

## Appendix 1: Summary of changes between Regulation 18 and Regulation 19 (Draft)

### Housing

#### Policy H4: Housing density

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>The aim of this policy is to enable appropriate residential densities in high quality design-led schemes.</li> <li>This is achieved by having a policy that requires making the best use of land whilst meeting a range of criteria. Higher densities are expected in the Town Centre, on strategic sites or within 500 metres of transport interchanges.</li> </ul>	<p>This proposed policy was removed in the Regulation 19 version and instead relevant aspects of it have been incorporated within policy D4 “Achieving high quality design and respecting local distinctiveness”. This has been done to reflect that an appropriate density is instead the outcome of a design-led approach and that increased densities are only appropriate if they do not have a detrimental impact on an area’s prevailing character and setting.</p>

#### Policy H5: Housing extensions and alterations

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>The aim of this policy is to achieve high quality designs for extensions and alterations.</li> <li>This is achieved by setting out detailed design criteria that consider the street scene, neighbours and the existing property. Policy criteria are also set out for basement extensions and annexes.</li> </ul>	<p>This policy has been retitled to ‘H5 Housing Extensions, Alterations including Annexes’. There has been no significant change in approach in the Reg 19 document however additional detail has been added in relation to ‘height’, ‘materials’, ‘design’, ‘appearance’, and for basement extensions a new requirement for a ‘clear internal access to upper floors’. Reference to annexes not being used as a self-contained dwellings has been deleted as covered by criteria that a bathroom or kitchen is shared with main house.</p>

#### Policy H6: Housing conversion and sub-division

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>The aim of this policy is to achieve high quality conversions and sub-divisions of buildings to flats, studios or bedsits.</li> <li>This is achieved by setting out design criteria for achieving high quality development.</li> </ul>	<p>There has been no significant change in approach in the Reg 19 document however additional detail has been added in relation to the identified design criteria.</p>

### Policy H7: Review Mechanisms

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• No proposed policy on 'Review Mechanisms'</li></ul>	<p>The proposed policy is intended to provide certainty and a stronger basis to require viability review in cases where lower than required affordable housing contributions are sought to be justified at planning application stage. This holds the potential to achieve further planning benefits in relation to affordable housing provision than might be agreed at the point of determination of the planning application.</p>

### Policy H8: First Homes

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• No proposed policy on 'First Homes'</li></ul>	<p>The Planning Practice Guidance states that local and neighbourhood plans that are subject to transitional arrangements (which include those plans that have not been submitted for examination or reached publication stage by 28 June 2021) should include policies for First Homes, considering the national requirements for them which are set out in the PPG. First Homes are the Government's preferred discounted market tenure and available only to first-time buyers whose annual income does not exceed £80,000 (outside Greater London).</p> <p>The proposed policy H8 aims to provide certainty to developers by setting out the minimum national and local policy requirements regarding provision of First Homes which will apply to all residential/mixed use schemes. The draft policy also includes criteria for permitting First Homes Exception Sites, including instances where market housing or other forms of affordable housing may be permitted on such sites.</p>

## Employment

### Policy E10: Rural development (including agricultural diversification)

Reg 18 approach	Reg 19 approach
<ul style="list-style-type: none"> <li>The aim of this policy is to support economic growth and local communities in rural areas.</li> <li>This is achieved by encouraging certain new economic uses and expansion of such uses in these areas, where proposed uses are not in conflict with national Green Belt policy.</li> </ul>	<p>The proposed policy was removed in the Regulation 19 version, as its provisions were fully duplicated in the NPPF, the LPSS and other policies of the emerging LPDMP.</p> <p>A table identifying where each provision of the Reg 18 policy proposal is addressed in the NPPF, LPSS and LPDMP is set out below.</p>

Policy paragraph no. (Reg 18)	NPPF and/or existing or proposed Local Plan policy that covers the same matters
<p><i>The preferred option is to support the development of the rural economy by means of a policy that clarifies the types of new buildings or changes of use of buildings and land that the Council would consider acceptable in principle, subject to any proposal falling within the exceptions listed in paragraph 145 (a) to (g) of the NPPF for sites in the Green Belt, or meeting the requirement of policy P3 (1) of the Local Plan: Strategy and Sites<sup>1</sup> for non-Green Belt sites.</i></p>	<p>See points below.</p>
<p><b>Green Belt</b>  <i>Within the Green Belt, the policy might support the following proposed forms of rural development, provided that any proposal falls within the exceptions listed in paragraphs 145 and 146 of the NPPF:</i></p> <ol style="list-style-type: none"> <li><i>1) New appropriate facilities for small-scale outdoor sport or outdoor recreation, such as a sports pavilion or clubhouse, or a small-scale building within a farm holding to accommodate outdoor recreational facilities such as an animal petting area.</i></li> <li><i>2) Conversion of vacant or redundant agricultural buildings to small-scale business, or recreational uses.</i></li> </ol>	<p><i>The NPPF provides exceptions for certain types of uses to be permissible within the Green Belt of the type that policy E10 lends support in principle to (outdoor recreational facilities and the conversion of vacant or redundant agricultural buildings – under “the re-use of buildings provided that the buildings are of permanent and substantial construction” (paragraph 146 (d)). Therefore, whilst not giving specific encouragement for them, it does not preclude them.</i></p>
<p><b>Countryside</b>  <i>Within the area of countryside, as designated on the Policies Map, the policy could support development of the following new uses in principle, provided they respect the area’s local character:</i></p> <ol style="list-style-type: none"> <li><i>3) Farm shops (provided they support the farm’s agricultural operations and are operated as part of the farm holding)</i></li> </ol>	<p><i>Policy P3: Countryside supports rural economic development of any kind in non-Green Belt areas (this includes points 3-8 of E10), provided that a rural/countryside location can be justified, and the proposal is proportionate to the nature and scale of the site and its</i></p>

<p>4) <i>Other farm diversification proposals, for example activity centres and arts and craft shops</i></p> <p>5) <i>tourist accommodation</i></p> <p>6) <i>small-scale rural tourism attractions</i></p> <p>7) <i>Small-scale leisure facilities</i></p> <p>8) <i>Horticultural nurseries and other small-scale business enterprises</i></p>	<p><i>setting and would not increase physical or visual coalescence between the existing urban area and villages around Ash and Tongham.</i></p> <p><i>Policy E5: Rural economy: Para (1) (b) supports the development and diversification of agricultural and other land-based rural businesses.</i></p>
<p><i>New buildings in the countryside should be clustered together where possible to reduce their visual impact on the character of the countryside and any built features should avoid harm to the local environment or residential amenity (particularly through noise).</i></p>	<p><i>Policy D4: Achieving high quality design and respecting local distinctiveness: requires development proposals to respond to prevailing character, landscape and topography.</i></p> <p><i>Policy D10: Noise impacts: Considers the impacts of noise on residents and users of existing developments and on sites protected for biodiversity.</i></p>
<p><b><i>Non-agricultural uses within farm holdings</i></b></p> <p><i>New buildings, or proposed changes of use of existing buildings, within a farm holding that are to be used for non-agricultural uses will be required to be operated as part of the farm holding and support the farm's agricultural operation.</i></p>	<p><i>This paragraph was considered to not be fully consistent with, or in the spirit of, the NPPF which generally promotes rather than imposing restrictions on rural economic development.</i></p>
<p><i>The Council will require adequate space to be made available within the curtilage of any building within a farm holding proposed for a farm shop or other non-agricultural use to allow for staff and visitor parking without detriment to the visual amenity of the countryside.</i></p>	<p><i>Policy ID3: Sustainable transport for new developments covers provision of adequate space for parking within the curtilage of a farm holding proposed for a non-agricultural use.</i></p>
<p><i>If permission is granted for a farm shop, the Council may apply conditions to limit the overall scale of the development and require that any goods for sale that are not produced locally remain ancillary to the sale of local produce.</i></p>	<p><i>This paragraph was considered to not be fully consistent with, or in the spirit of, the NPPF which generally promotes rather than imposing restrictions on rural economic development.</i></p>

## Policy E11: Horse Related Development

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of this policy is to address the adverse impacts that may arise from the approval of planning applications for horse-related development.</li><li>• This is achieved by setting criteria related to visual and neighbourhood amenity impacts, bridleway erosion and highway safety impacts.</li></ul>	<p>This policy has been retitled to 'E11 Equine Related Development', to reflect its coverage to all equine animals, and not just horses. There has been no significant change in approach in the Reg 19 document however additional detail has been added in relation to "the character of the built environment" to the criteria for assessing small-scale equine-related developments, and for proposals to be "of an acceptable scale, location, design and layout". A further criterion was added for commercial equine related proposals not to harm the operation of an agricultural holding, to ensure that they protect existing viable agricultural uses and the first criterion was strengthened by amending it to state that provision of land and stabling should "be in compliance with", rather than "have regard to" Government published standards.</p>

## **Protecting**

### Policy P6: Biodiversity in new developments

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of this policy is maximise biodiversity gains in all new developments</li><li>• This is achieved by establishing biodiversity as a priority in new developments and sets out the considerations when designing and delivering new developments.</li></ul>	<p>This policy has been combined with Reg 18 policy P7 "Biodiversity Net Gain" to create Reg 19 policy P6/P7 entitled "Biodiversity in new developments" which collects together policy dealing with provision and enhancement of biodiversity in development sites. However, the approach set in both Reg 18 policies is retained with Biodiversity Net Gain becoming a sub-section of a broader biodiversity policy. The section "Sites that include or are adjacent to sensitive habitats" has been moved to Reg 19 policy P8/P9, which combines Reg 18 policies P8 and P9 into a single policy dealing with the protection of important habitats and species. A new paragraph designed to prevent the spread of invasive species has been added.</p>

Policy P7: Biodiversity net gain

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim is to provide clarity and detail for the requirement for developments to aim to achieve biodiversity net gain set out in policy ID4.</li><li>• This is achieved by requiring a 20% net gain in biodiversity for all new developments, barring exceptions such as brownfield sites. It also sets out a methodology that accords with the emerging national net gains approach.</li></ul>	<p>This policy has been combined with Reg 18 policy P6 to create Reg 19 policy P6/ P7 entitled “Biodiversity in new developments” which collects together policy dealing with provision of biodiversity in new development. However, the approach set in both Reg 18 policies is retained with Biodiversity Net Gain (BNG) becoming a sub-section of a broader biodiversity policy.</p> <p>The exemptions to the requirement for BNG have been changed to align with national policy by exempting self-build. This was done to reduce the amount of conflict with the emerging Environment Bill.</p>

Policy P8: Woodland, trees, hedgerows and irreplaceable habitats

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of this policy is to protect important woodlands, trees, hedgerows and irreplaceable habitats.</li><li>• This is achieved by protecting woodland, trees, hedgerows and irreplaceable habitats in order to ensure that these are not lost due to development.</li></ul>	<p>This policy has been combined with Reg 18 policy P9 to create Reg 19 policy P8/P9 entitled “Protecting important habitats and species”.</p> <p>This brings together policy that deals with the protection and conservation of important and vulnerable habitats and species. However, the approach is retained though the new policy is broader than woodland, trees, hedgerows and irreplaceable habitats.</p> <p>The section “Sites that include or are adjacent to sensitive habitats” has been moved to the policy from Reg 18 policy P6 (biodiversity in new developments) as it deals with protection rather than provision.</p> <p>Unmodified rivers has been added to irreplaceable habitats at the request of the EA and aquatic habitats are now defined as a sensitive habitat.</p> <p>A new clause requiring site design to discourage harm to ancient woodland from human activity was added to address a known issue with cut-throughs harming ancient woodland.</p>

Policy P9: Priority species and priority habitats on undesignated sites

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of this policy is to protect species and habitats that are not</li></ul>	<p>This policy has been combined with Reg 18 policy P8 to create Reg 19 Policy P8/P9 entitled “Protecting important habitats and species”.</p>

<p>covered by Policy ID4 (which protects designated sites).</p> <ul style="list-style-type: none"> <li>This is achieved by protecting priority species and habitats on undesignated sites.</li> </ul>	<p>Reg 19 policy P8/P9 brings together policy that deals with the protection and conservation of important and vulnerable habitats and species. However, the approach is retained though the new policy is broader than species and habitats on undesignated sites.</p> <p>The section “Sites that include or are adjacent to sensitive habitats” has been moved to this policy from Reg 18 policy P6.</p> <p>The reference to the mitigation hierarchy in para 2 has been moved to the sensitive habitats section so that it applies to all the habitats covered by the policy.</p> <p>“Species and habitats protected by law” has been amended to “Species of Principle Importance” in the list of Priority Species and Habitats as some legally protected animals are protected for reasons other than conservation.</p>
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Policy P10: Contaminated Land

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>The aim of this policy is to support the remediation of despoiled, contaminated or unstable land on appropriate sites, whilst preventing increased risk to sensitive receptors from potential sources of contamination.</li> <li>This is achieved by placing requirements on developers to ensure that all appropriate investigations and assessments are carried out and provided with the application and that the land is made fit for its intended purpose through remediation, design and site layout.</li> </ul>	<p>Policy has been retitled to ‘P10 Land Affected by Contamination’. There has been no significant change in approach in the Reg 19 document however the Reg 19 policy now makes it clear that where insufficient information is submitted or if remediation cannot be achieved then the application will be refused.</p>

Policy P11: Air Quality and Air Quality Management Areas

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>The aim of this policy is to ensure new development does not have adverse impact on air quality and seeks opportunities to actively improve air quality.</li> <li>This is achieved by placing requirements on developers to ensure that new development does not give</li> </ul>	<p>There has been no significant change in approach in the Reg 19 document with the exception of the deletion of the Biomass criteria. The Regulation 19 policy addresses potential adverse impacts from ‘all sources of emissions to air’, which includes Biomass technology and it is therefore unnecessary to include specific reference to it.</p>

<p>rise to adverse impacts on health and quality of life from air pollution, seeks to reduce exposure to poor air quality across the borough, and improve levels of air pollutants in Air Quality Management Areas (AQMA).</p>	<p>Policy also strengthened to protect air quality outside of AQMAs.</p>
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Policy P12: Water Resources and Water Quality

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• The aim of this policy is to ensure new development does not have an adverse impact on water quality.</li> <li>• This is achieved by placing requirements on developers to seek opportunities to improve water quality, avoid a detrimental impact on the flow or quantity of groundwater, and contribute towards Water Framework Directive water bodies maintaining or achieving 'Good Ecological Status'.</li> </ul>	<p>Policy has been retitled to 'P12 Water Quality, Waterbodies and Riparian Corridors'. The content included in the Reg 18 document has been retained (with some amendments), however additional detail has been added in relation to prevent development causing deterioration in the chemical or ecological status of any waterbody, or preventing the achievement of their target status.</p> <p>There is a new criteria that encourages development to seek opportunities to implement measures to improve water quality, specifically the Water Environment Regulations status of a waterbody.</p> <p>This policy now picks up aspects that were previously proposed to be picked up in P6 (a semi-natural buffer adjacent to watercourses) and includes other general policy designed to protect and enhance the ecological value of waterbodies (natural banks, flow quantity and quality, fish movement and natural flood management). It includes the expectation that non-residential developments, excluding essential infrastructure, that would have high water usage, should include water collection and storage measures sufficient to avoid abstraction from existing surface-level and groundwater resources or recourse to the public water supply. This criteria was moved from Reg 18 Policy ID7).</p>

Policy P13: Sustainable Drainage Systems (SuDS)

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• The aim of this policy is to provide greater clarity on what the Council expects from developers in relation to the SuDs schemes.</li> <li>• This is achieved by placing requirements on developers to ensure</li> </ul>	<p>Policy has been retitled to 'P13 Sustainable Surface Water Management'. There has been no significant change in approach in the Reg 19 document however significant additional detail has been included in order to clarify the points outlined in the Regulation 18 policy approach.</p>



that proposals for major development incorporate SuDS where required by the lead local flood authority and that the SuDS schemes satisfy technical standards and design requirements.	These ensure that SuDS are designed to maximise ecological and aesthetic value, set out a hierarchy of preferred SuDS approaches, provide detail in relation to infiltration SuDS management and cover surface-water run-off in greater detail.
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Policy P14: Regionally Important Geological/Geomorphological Sites

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>The aim of this policy is to protect Regionally Important Geological/Geomorphological Sites (RIGS).</li> <li>This is achieved by having a policy that grants permission for development where the value of RIGS sites will not be harmed unless clear justification is provided.</li> </ul>	There has been no significant change in approach in the Reg 19 document however the mitigation hierarchy has been made clearer.

## Design

Policy D4: Achieving High Quality Design and Local Distinctiveness

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>The aim of these policies is to enable the delivery of high-quality, place sensitive and sustainable buildings, streets and spaces, that have regard to their surroundings, and historic and local character and which create an inclusive and attractive environment.</li> <li>This is achieved by setting design principles that will apply to all development proposals.</li> </ul>	Policy has been retitled to 'D4 Achieving High Quality Design and Respecting Local Distinctiveness'. There has been no significant change in approach in the Reg 19 document however the policy has been restructured to improve clarity and focus. The main changes were removal of aspects that were already covered by LPSS Policy D1, and the addition of the expectation that proposals make efficient use of land where it would not have a detrimental impact on an area's prevailing character and setting and that appropriate densities are achieved on sites through a design-led approach. The policy now also hooks in the 10 characteristics of well-designed places from the National Design Guide.

Policy D5: Privacy and Amenity

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>The aim of these policies is to enable the delivery of high-quality, place sensitive and sustainable buildings,</li> </ul>	Policy has been retitled to 'D5 Protection of Amenity and Provision of Amenity Space'. Aspects of the policy which required the careful

<p>streets and spaces, that have regard to their surroundings, and historic and local character and which create an inclusive and attractive environment.</p> <ul style="list-style-type: none"> <li>• This is achieved by setting design principles that will apply to all development proposals.</li> </ul>	<p>design of bin and bike storage and other servicing features have been moved into a new policy. There has been no significant change in approach in the Reg 19 document however additional detail has been added in relation to the provision of private amenity space.</p>
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Policy D5a: External Servicing Features and Stores

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• No proposed policy on 'External Servicing Features and Stores'</li> </ul>	<p>This policy picks up aspects previously proposed to be covered by Policy D5. It requires the careful and sensitive design of bin and cycle storage, electric vehicle charging points and other external servicing features so that they do not detract from the overall design of the scheme.</p>

Policy D6: Shopfront design

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• The aim of these policies is to enable the delivery of high-quality, place sensitive and sustainable buildings, streets and spaces, that have regard to their surroundings, and historic and local character and which create an inclusive and attractive environment.</li> <li>• This is achieved by setting design principles that will apply to all development proposals.</li> </ul>	<p>Policy has been retitled to 'D6 Shopfront Design and Security'. There has been no significant change in approach in the Reg 19 document however additional detail has been added in relation to the key principles of good design.</p>

Policy D7: Advertisements, hanging signs and illumination

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• The aim of these policies is to enable the delivery of high-quality, place sensitive and sustainable buildings, streets and spaces, that have regard to their surroundings, and historic and local character and which create an inclusive and attractive environment.</li> <li>• This is achieved by setting design principles that will apply to all development proposals.</li> </ul>	<p>The content of the policy has been significantly revised particularly in relation to those aspects that went beyond what can be included in policy, as stipulated in the advertisement regulations. The Reg 19 policy focuses on amenity, public safety and principles of good design.</p>

### Policy D8: Public Realm

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of these policies is to enable the delivery of high-quality, place sensitive and sustainable buildings, streets and spaces, that have regard to their surroundings, and historic and local character and which create an inclusive and attractive environment.</li><li>• This is achieved by setting design principles that will apply to all development proposals.</li></ul>	<p>There has been no significant change in approach in the Reg 19 document however additional detail was added to the criteria to improve clarity and reference landscaping and mobility hubs. Aspects that were already covered by LPSS Policy D1 were deleted as was reference to on street dining opportunities as this is already addressed through the licencing regime.</p>

### Policy D9: Residential intensification

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of this policy is to enable residential intensification and development within inset villages that respects the prevailing characteristic of the area.</li><li>• This is achieved by setting design principles that will apply to residential intensification schemes, including specific criteria for schemes within villages inset from the Green Belt.</li></ul>	<p>Reg 19 policy has been retitled to 'D9 Residential infill development proposals' to make it clearer as to what type of development it covers. Policy re-ordered and expanded to include criteria applicable to all types of infill development in all locations, followed by separate criteria on 'Infilling: backland development proposals' and 'Infilling: frontage development proposals'. The policy retains the criteria relevant only in villages however it now applies to all villages, rather than just those inset from Green Belt.</p>

### Policy D10: Agent of Change and Noise Impacts

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of this policy is to ensure that new development can be integrated effectively with existing businesses, community facilities and 'noise-sensitive' uses such as residential uses, by developing a policy that articulates the 'agent of change' principle and manages noise impacts. The principle of 'agent of change' is that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.</li><li>• This is achieved by setting criteria for both 'noise-sensitive' and 'noise-generating' uses.</li></ul>	<p>Reg 19 policy has been retitled to 'D10 Noise Impacts'. There has been no significant change in approach in the Reg 19 document however some aspects that comprised guidance rather than policy have been moved to the supporting text.</p>

Policy D10a: Light Impacts and Dark Skies

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• No proposed policy on 'Light Impacts and Dark Skies'</li></ul>	<p>Consultation feedback highlighted that the Regulation 18 Plan did not cover Light Impacts. New Policy D10a addresses potential adverse impacts from artificial light.</p> <p>The policy requirements are similar to the structure of 'D10 Noise Impacts'. The approach ensures that the issue of potential impacts are considered and, where potential impacts are found, appropriate avoidance and mitigation measures are implemented in order to prevent these.</p>

Policy D11: The River Wey and Guildford & Godalming Navigation

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of this policy is to support the protection and enhancement of these corridors, including their visual quality, setting, amenity, ecological value, architectural and historic interest and views within and from.</li><li>• This is achieved by supporting development which promotes high quality contextual design; seeks to improve access to, from and positively contributes to enhancing the landscape and biodiversity of the riparian environment.</li></ul>	<p>There has been no significant change in approach in the Reg 19 document however some aspects which are applicable to all watercourses are now picked up through other policies. Additional detail has been added to clarify the different aspects that need to be considered when developing on or near to the river. The policy also seeks to improve visual and physical access to and along the river.</p>

Policy D12: Sustainable and low impact development

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of this policy is to provide greater detail to supplement adopted Policy D2 where it supports sustainable and low impact development.</li><li>• This is achieved by setting requirements and expectations for energy efficiency, resource efficiency, water efficiency, waste and embodied carbon.</li></ul>	<p>There has been no significant change in approach in the Reg 19 document however additional detail has been added in relation to support for schemes that improve the energy/carbon performance of existing buildings.</p>

Policy D13: Climate Change Adaptation

Reg 18 approach	Reg 19 approach
<ul style="list-style-type: none"> <li>The aim of this policy is to deliver climate change resilient development.</li> <li>This is achieved by setting out the considerations when designing and delivering climate change adapted development.</li> </ul>	<p>There has been no significant change in approach in the Reg 19 document.</p>

Policy D14: Climate change mitigation

Reg 18 approach	Reg 19 approach
<ul style="list-style-type: none"> <li>The aim of this policy is to deliver climate change mitigation measures.</li> <li>This could be achieved by setting out an increase to the LPSS carbon emissions standard for new buildings. Whilst we are awaiting the government’s approach in relation to this issue, we consider it would be premature to put forward a preferred approach at this time.</li> </ul>	<p>This policy has been retitled to ‘D14 Carbon Emissions from Buildings’. The government has set out its approach to housing standards in its response to the Future Homes consultation and is considering its response to the Future Buildings consultation. Policy D14 improves our extant carbon emission standard for new homes from 20% to 31% lower than building regulations maximum standards. The policy also proposes to apply this standard to non-residential buildings. However, we are currently looking at the detail of the approach and the viability implications in order to understand whether the proposals are viable.</p>

Policy D15: Large scale renewable and low carbon energy

Reg 18 approach	Reg 19 approach
<ul style="list-style-type: none"> <li>The aim of this policy is to facilitate large scale renewable and low carbon development.</li> <li>This is achieved by potentially allocating land for low and zero carbon development and requiring any new energy developments to protect biodiversity.</li> </ul>	<p>Policy has been retitled to ‘D15 Renewable and low carbon energy Generation and Storage. The preferred option of allocating land for renewable and low carbon energy has not been taken forward, and instead a policy that generally supports and facilitates renewable energy development has been included in the Reg 19 version.</p>

Policy D16: Designated Heritage Assets

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of these policies is to set out a positive strategy and operational detailing for managing new development affecting designated heritage assets in a manner that sustains and enhances their architectural and historical significance.</li><li>• This is achieved by placing requirements on developers to submit proportionate evidence and justification, setting out specific guidelines and design principles for the delivery of well-conceived development that sustains and enhances the significance of assets.</li></ul>	<p>There has been no significant change in approach in the Reg 19 document. The Enabling Development aspect has been separated from this policy and now forms its own individual policy – due to it being applicable to both designated and non-designated heritage assets.</p>

Policy D17: Listed Buildings

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of these policies is to set out a positive strategy and operational detailing for managing new development affecting designated heritage assets in a manner that sustains and enhances their architectural and historical significance.</li><li>• This is achieved by placing requirements on developers to submit proportionate evidence and justification, setting out specific guidelines and design principles for the delivery of well-conceived development that sustains and enhances the significance of assets.</li></ul>	<p>There has been no significant change in approach in the Reg 19 document however the policy has been re-structured with some additional emphasis on the matter of setting being provided.</p>

Policy D18: Conservation Areas

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of these policies is to set out a positive strategy and operational detailing for managing new development affecting designated heritage assets in a manner that</li></ul>	<p>There has been no significant change in approach in the Reg 19 document although the policy has been re-structured.</p>

<p>sustains and enhances their architectural and historical significance.</p> <ul style="list-style-type: none"> <li>• This is achieved by placing requirements on developers to submit proportionate evidence and justification, setting out specific guidelines and design principles for the delivery of well-conceived development that sustains and enhances the significance of assets.</li> </ul>	
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Policy D19: Heritage Assets: Schedule Monuments & Registered Parks and Gardens

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• The aim of these policies is to set out a positive strategy and operational detailing for managing new development affecting designated heritage assets in a manner that sustains and enhances their architectural and historical significance.</li> <li>• This is achieved by placing requirements on developers to submit proportionate evidence and justification, setting out specific guidelines and design principles for the delivery of well-conceived development that sustains and enhances the significance of assets.</li> </ul>	<p>Due to the different legislative regimes governing these particular heritage assets, each is now covered by their own distinct policy.</p> <p>This policy is now entitled ‘Scheduled Monuments’. The policy has been re-structured, with additional emphasis on the matter of setting being provided.</p>

Policy D19a: Historic Parks & Gardens

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• This policy formed part of ‘D19 Heritage Assets: Schedule Monuments &amp; Registered Parks and Gardens’</li> </ul>	<p>Due to the different legislative regimes governing these particular heritage assets, each is now covered by their own distinct policy.</p> <p>This policy is now entitled ‘Historic Parks &amp; Gardens’. The policy has been re-structured, with additional emphasis on the matter of views being provided.</p>

Policy D20: Non designated heritage assets

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• The aim of this policy is to ensure that the value and significance of the borough’s non-designated heritage</li> </ul>	<p>There has been no significant change in approach in the Reg 19 document although the policy now provides for the possibility of as yet</p>

<p>assets are recognised and safeguarded so that they can continue to contribute to the richness of the historic environment and help to inform future development and regeneration.</p> <ul style="list-style-type: none"> <li>• This is achieved by identifying a presumption for their retention and enhancement, as well as placing requirements on developers to support all applications with a proportionate evidence and justification.</li> </ul>	<p>unknown or identified archaeological remains being encountered, and stipulating clearly under what circumstances a preliminary archaeological site evaluation would be required.</p>
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Policy D21: Enabling Development and Heritage Assets

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• Proposed policy on enabling development formed part of Policy D16: Designated Heritage Assets</li> </ul>	<p>The policy is now applicable to both designated and non-designated heritage assets. It includes the key test and requirements that were once quoted in national guidance.</p>

**Infrastructure**

Policy ID5: Protecting Open Space

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• The aim of this policy is to provide detail and clarity for policy ID4 in order to enhance protection open space.</li> <li>• This is achieved by preventing the loss of existing open space except for narrow circumstances defined in the NPPF.</li> </ul>	<p>There has been no significant change in approach in the Reg 19 document. The only notable change was to delete the reference to not permitting the loss of an open space with a specific nature conservation, historic, cultural or recreational value) as such sites are protected by other Local Plan policies that deal with these issues, including Policy D3: Historic Environment and emerging LPDMP Policy P6.</p>

Policy ID6: Open space in new developments

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• The aim of this policy is to ensure that new developments provide new open spaces that provide best value in terms of multi-functional benefits.</li> <li>• This is achieved by setting standards for open space provision in new developments to ensure that provision meets the open space needs arising from it.</li> </ul>	<p>There were several changes in the Reg 19 version of the policy, of which the following were the key ones: It was clarified that all developments must contribute to open space, whether through on-site provision or a financial contribution in lieu. This includes schemes of less than 11 units, which will be required to provide a financial contribution for all open space typologies. The table in the policy in the Reg 18 document</p>



	<p>that set out the quantity and access standards for open space was amended in the Reg 19 policy to indicate that the access standards are expected, rather than absolute maximum distances. This change is to allow site-specific flexibility in cases where the access standards cannot be precisely met without compromising a scheme's design and layout.</p> <p>A further amendment was to state that community growing space will be "expected" for denser developments (rather than "may be particularly appropriate") and that such provision should be in addition to, rather than a replacement for, any required contribution to statutory allotment provision.</p>
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Policy ID7: Sport, recreation and leisure facilities

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"> <li>• The aim of this policy is to support the appropriate provision of sport, recreation and leisure facilities.</li> <li>• This is achieved by supporting development that provides, increases or improves opportunities for public sport, recreation and leisure, including schemes for new, replacement and extensions to existing facilities, and engineering works.</li> </ul>	<p>This policy was removed, as its provisions were duplicated in the NPPF, which deals with the first point in relation to provision of new footpaths and cycle links, and other emerging LPDMP policies, including Policy P12: Water Resources (which covers the third point about water collection and storage measures).</p> <p>The second point of Policy ID7, which would have restricted development to that "necessary to support the proposed recreational or leisure use and ancillary activities", was considered unjustified and not in accordance with other Local Plan policies, or the NPPF, which generally promotes all types of rural development and considers development of outdoor sport and outdoor recreation facilities in the Green Belt appropriate in principle (paragraph 145 b)).</p> <p>The Local Plan 2003 included a number of specific sports facility policies and the purpose of this proposed policy was to capture elements of these which, at the time, were not being picked up by other proposed policies. Upon review, all aspects of the LP03 are addressed elsewhere. This is demonstrated in the table below.</p>

<b>2003 Local Plan policy (paraphrased)</b>	<b>NPPF and existing or proposed Local Plan policy that cover the same matters</b>
<p><u>R6: Intensification of recreational use</u></p> <p>Supports floodlighting/all weather surfaces subject to acceptable environmental, traffic and visual impacts.</p>	<p>D1 (LPSS): design</p> <p>ID3 (LPSS): traffic assessment and travel plan for significant trip generation</p> <p>ID11: parking standards</p> <p>D10a: light impacts on amenity</p>
<p><u>R7: Built facilities for recreational use</u></p> <p>Supports new/improved facilities in urban areas</p>	<p>See above commentary</p>
<p><u>R8: Golf courses</u></p> <p>Protects Best and Most Versatile agricultural land.</p> <p>Prevents adverse impacts on landscape character, nature conservation interest, archaeological interest, water environments, historic landscapes and heritage assets.</p> <p>Limits built development to only that necessary.</p> <p>Protects rights of way.</p> <p>Adequate and discrete parking.</p>	<p>NPPF 170a, 170b and E5 (LPSS): Protects BMV</p> <p>D1 (LPSS): Landscape character, discrete parking.</p> <p>ID4 (LPSS), P6, P7, P8: Nature conservation and water environments</p> <p>D3 (LPSS), NPPF 11, 187b, 189, whole of chapter 16: archaeological interest, historic landscapes, heritage assets</p> <p>See above commentary (Limits built development to necessary)</p> <p>NPPF 98, legal protection: Protects/enhances rights of way.</p> <p>ID3 (LPSS), ID11: Adequate parking.</p>
<p><u>R9: Noisy sports, adventure games and similar activities</u></p> <p>Protects amenity of nearby occupants, landscape character, nature conservation interest, archaeological interest, water environments, historic landscapes, heritage assets, BMV agricultural land, nearby recreational uses.</p> <p>Limits built development.</p> <p>Discrete parking.</p>	<p>Largely as R8.</p> <p>D5: protection of amenity</p> <p>D10: noise impacts.</p>
<p><u>R10: Water based recreational activities</u></p> <p>Protects landscape character, nature conservation interest, archaeological interest, water environments, historic landscapes,</p>	<p>Largely as R8.</p> <p>NPPF chapter 13, P2 (LPSS): Openness (Green Belt)</p>

*heritage assets and the best, BMV agricultural land, character, openness.*

*Discrete parking*

*Traffic and highway safety.*

Policy ID8: Community facilities

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of this policy is to ensure that community facilities are accessible to serve residents' needs.</li><li>• This is achieved by expecting that facilities are accessible by walking, cycling and public transport, resisting their loss and supporting associated complementary or ancillary uses.</li></ul>	<p>There has been no significant change in approach in the Reg 19 document. The main changes include ensuring the criteria for considering potential loss are robust, whilst appropriate to particular circumstances. Furthermore, policy to encourage flexibility of design of community hubs has been added to address changing community needs.</p>

Policy ID9: Retention of Public Houses

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of this policy is to prevent the loss of public houses to other uses.</li><li>• This will be achieved through requiring that the business is marketed as a public house and alternative community facility for a continuous period of at least 18 months.</li></ul>	<p>There has been no significant change in approach in the Reg 19 document however the proposed requirement for an applicant to assess alternative licenced premises within "easy walking distance" of the public house proposed for redevelopment/change of use has been amended to a requirement to assess premises within "reasonable walking distance" of residential properties served by the pub's catchment area. This was considered a more practical and effective way for the policy to operate as it would consider the location of the pub's existing customers, rather than simply the location of the pub itself.</p>

Policy ID10: Achieving a comprehensive Guildford borough cycle network

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<ul style="list-style-type: none"><li>• The aim of this policy is to define a comprehensive Guildford borough cycle network, including the provision</li></ul>	<p>There has been no significant change in approach in the Reg 19 document however reference is now made to the updated DfT guidance (Cycle Infrastructure Design (LTN</p>

<p>of, and improvements to, cycle routes and cycle parking facilities, enabling new developments to deliver apposite direct improvements.</p> <ul style="list-style-type: none"> <li>This will be achieved by combining the outputs from Guildford BC's Route Assessment Feasibility Study for the Guildford urban area (2020) and Surrey CC's Guildford Local Cycling Plan (2015), the latter most particularly for the rest of the borough outside of the Guildford urban area.</li> </ul>	<p>1/20)) which requires a higher standard of infrastructure delivery.</p> <p>The Reg 19 approach makes explicit the primary focus on the promotion of utility cycling (for work, school, errands) to aid modal shift, as opposed to leisure journeys.</p> <p>The mechanisms by which the improvements can be delivered are also detailed.</p>
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Policy ID11: Parking standards

<b>Reg 18 approach</b>	<b>Reg 19 approach</b>
<p>The aims of this policy are:</p> <ul style="list-style-type: none"> <li>in Guildford town centre to optimise the density of, and to limit the level of car trip making associated with, new residential developments</li> <li>in the rest of the borough to avoid the problems of congested on-street parking in new residential developments and overspill parking on adjacent local streets</li> <li>to achieve appropriate provision of car parking associated with non-residential developments across the borough</li> <li>to achieve appropriate provision of cycle parking and electric vehicle charging facilities in new residential and non-residential developments</li> </ul> <p>This will be achieved by:</p> <ul style="list-style-type: none"> <li>defining standards for the provision of off-street car parking for new developments in the borough, specifically with maximum standards for residential developments in Guildford town centre, minimum standards for residential developments in the rest of the borough and expected standards for non-residential developments across the borough</li> <li>defining minimum cycle parking standards for new developments</li> </ul>	<p>There has been a significant change in approach in the Reg 19 document.</p> <p>This aims of the policy are:</p> <ul style="list-style-type: none"> <li>to make provision to meet the needs of new residents and occupiers whilst limiting overspill parking on adjacent streets.</li> <li>to provide flexibility in application tailored to both urban and rural settings, which allows for the design of a development proposal to respond to place-specific opportunities for the promotion of transport sustainability and the efficient use of land.</li> </ul> <p>Key changes which will achieve this include:</p> <ul style="list-style-type: none"> <li>Residential parking standards in the urban area (now suburban areas as well as town centre) set as maximum</li> <li>Residential parking standards in village and rural areas set as expected</li> <li>Non-residential parking standards set as maximum</li> </ul> <p>Further policy direction set:</p> <ul style="list-style-type: none"> <li>Parking standards in Neighbourhood Plans will take precedence over standards in the LPDMP, except in relation to Strategic Sites</li> <li>Requirement to provide visitor parking at a rate of 0.2 spaces per dwelling</li> </ul>

<ul style="list-style-type: none"><li>• defining electric vehicle charging standards for new developments.</li></ul>	<p>where 50% or more of spaces are provided as allocated spaces</p> <ul style="list-style-type: none"><li>○ Minimum dimensions for car parking spaces &amp; garage sizes specified</li><li>○ Stipulations for the promotion of either low-car or car-free development set out</li></ul> <p>The approach of maximum standards for new residential developments in the town centre and electric vehicle charging facilities in new residential and non-residential developments remains unchanged.</p> <p>All proposed car parking standards reflect and are benchmarked against local car availability levels, calculated using Census data.</p> <p>The standards for the provision of minimum cycle parking have been updated to bring them in line with the latest DfT Guidance as set out in the Local Transport Note 1/20 Cycle Infrastructure Design.</p>
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