

Main Issues Raised in the Regulation 18 Consultation of the Local Plan: Development Management Policies – Issues and Preferred Options Consultation

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Policy H4 Housing density		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		
	Density is a rather blunt tool for determining appropriate forms of development in itself, but when combined with other tests such as design quality and prevailing character can lead to more sustainable forms of new housing.	Reference to density is now incorporated within proposed Policy D4 'Achieving high quality design and respecting local distinctiveness'.
Environment Agency		
	We note Policy H4 does not include flood risk. Policy P4: Flooding, flood risk and groundwater protection zones should be included as a relevant policy. Sites in the floodplain may not be suitable for development or may be required to provide floodplain compensation and therefore are not able to deliver the density of houses original required, without increasing flood risk elsewhere. Furthermore, increased numbers of dwellings in areas in the 'developed' Flood Zone 3b – functional floodplain should not be permitted. This is in accordance with the paragraph 155 of the NPPF.	LPSS policy P4: Flooding, flood risk and groundwater protection zones covers proposals in flood risk areas. Proposals will be assessed in accordance with the development plan. The plan must be read as a whole - it is unnecessary to cross reference or repeat policies.
Surrey Nature Partnership		
	Yes, we generally support this option. Housing density has implications for on-site greenspace provision, which of course is the preferred first opportunity to incorporate any obligatory Biodiversity Net Gain (BNG).	Comments noted.
Other organisations		
East Clendon Parish Council		
	There should be no automatic presumption towards 'higher density development' at the strategic sites under this policy. The GBC strategic sites should be established with reference to the general character (and hence density) of their surrounding communities. Some of these	Policy H4 is now deleted and aspects relating to density incorporated within proposed Policy D4 'Achieving high

	<p>surrounding communities are low density rural villages. Furthermore, there should be reference to the character of the landscape setting and specific densities for specific 'characters/types' of areas needs to be provided within the proposed policy.</p>	<p>quality design and respecting local distinctiveness'. Policy D4 requires 'appropriate residential densities' that result from a design-led approach, and consider factors such as the context and local character of the area. Policy D4 states increased densities may be appropriate if there is no detrimental impact on an area's prevailing character and setting. This would need to be considered alongside Policy D1(5) on strategic allocations. Policy D4(3) states development should respond positively to significant views (to and from), surrounding context, prevailing character, landscape and topography.</p>
<p>Burpham Neighbourhood Forum</p>		
<p>Page 12 to 20</p>	<p>Recognising the benefits of sustainable higher density developments whilst carefully managing the impact of density and development on the character of local areas. Comment: This section should recognise the need for Quality of Life for residents of high density developments. The current health crisis has demonstrated the need for private open space, for mental health and well being. High density development should not be viewed as a "Hectares to House ratio" game. The impact of low housing density ultimately results in the use of more land for housing developments which can be unsustainable. Comment: the term 'unsustainable' is not defined. We need a mix of homes across the borough please see previous comments on high density Homes. Box: The NPPF and PPG set out a range of considerations and tools that can assist in establishing appropriate densities on a site or in a particular area, such as accessibility, characterisation and design studies, environmental and infrastructure assessments and site viability. This is considered preferable to setting minimum density ranges for specific locations (the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges). To set out minimum density ranges is considered to be restrictive and complicated to ascertain and will limit the flexibility that is often needed when determining a planning application.</p>	<p>Policy H4 has been deleted and incorporated within proposed Policy D4: 'Achieving high quality design and respecting local distinctiveness' so that density is an outcome of a design led approach, informed by many factors. Policy D4 expects development proposals to make efficient use of land and that increased densities may be appropriate if there are no detrimental impact on an area's character and setting. This seeks to balance sustainability issues with achieving well designed, appropriate development. Proposed Policy D5: 'Protection of amenity and provision of amenity space' requires all new residential</p>

		developments to have direct access to an area of private outdoor amenity space and flats to have balconies.
	This 500m is unsustainable across generations - 400m is the norm - this must not be "as the crow flies". Other planning documents state 400m walking distance max thus does not comply with other documents. Major sites strategy doc needs checking. Blue badges are awarded to people who can't walk 100 metres.	The 500 metres & transport interchanges criterion is no longer incorporated in the proposed policies.
	This policy needs to reference Neighbourhood Plans as Burpham for example has its own policies dealing with density. We agree with dealing with density on a site by site basis, subject to the policies of the Burpham Neighbourhood Plan for development proposals within Burpham ward boundary which includes part of Gosden Hill. This section should list Neighbourhood Plans as a further source of design Guidance.	Neighbourhood Plans are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts, so replication in the Local Plan is not necessary.
Downsedge Residents Association		
	We do not agree with the preferred option. NPPF para 16 states that: " Plans should: contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;" No attempt has been made to clarify what an 'appropriate density' would be, or to reference evidential guidance on the widely differing character and density of areas within the Borough. The wording of this option is ambiguous and does not clarify density ranges, which would be appropriate for specific, established areas. Setting density ranges related to the existing density of the area and applying a potential uplift which would still maintain the valued character of these well established areas would be a clearer less ambiguous approach, particularly for areas not covered by neighbourhood plans, or falling within conservation areas. NPPF para 123(b) suggests that - "It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range". Given the varied character and density of established areas across the Borough, density ranges should be set based on the prevailing density of existing settlements as identified in GBC's Landscape and Townscape Character Assessment and Guidance documents (2007 - 2009). This would be a helpful approach particularly in established garden suburb areas and villages removed from the greenbelt, particularly when applied to smaller windfall sites. In the	Policy H4 has now been replaced by Policy D4 which requires 'appropriate residential densities' that are demonstrated to result from a designed approach taking into account context and local character etc. This enables an appropriate density for the particular site being an outcome, rather than adherence to a predetermined density or range or applying a mathematical calculation. Whilst this approach may result in an average density across a site being within such a range, it is often the location of different forms or densities of development across a site which are more important in considering whether a proposal is appropriate. Policy D4

	<p>Downsedge area a maximum increase in density from prevailing approx 10 dph to 20dph successfully retains the highly valued green landscape character. This approach would also be more specific when considering NPPF para 122 "d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change;"</p>	<p>addresses the expectation for proposals to make efficient use of land, caveated by not having a detrimental impact on an area's character and setting (in line with NPPF para 122 d).</p>
<p>East Horsley Parish Council</p>		
	<p>Paragraph 2 of Policy H4 requires 'higher density development' at the strategic sites. However, we do not agree that this should be a presumption within this policy. The NPPF requires the 'efficient use of land' but this is not the same thing as requiring the largest possible number of houses to be built upon it. The supporting text argues that strategic sites because of their scale can establish their own character - it is assumed therefore they can effectively ignore the character of their surrounding areas in this process. We believe this argument is fallacious. The GBC strategic sites are not of such a vast scale that they can be established without any reference to the general character (and hence density) of their surrounding communities. Some of these surrounding communities are high density urban settlements, but some are low density rural villages. As such we believe there should be no automatic presumption towards high density development at the strategic sites under this policy.</p> <p><i>SUGGESTION:</i> Delete the words 'strategic sites' from Paragraph 2 of Policy H4.</p>	<p>Proposed Policy H4 is replaced by Policy D4: 'Achieving high quality design and reflecting local distinctiveness' and the reference to strategic sites is removed. Policy D4 would be considered alongside Policy D1(5) on strategic allocations. The efficient use of land is addressed in Policy D4 and increased densities may be appropriate if they would not have a detrimental impact on an area's prevailing character and setting. Policy D4 requires 'appropriate residential densities' that result from a design-led approach, which would consider factors such as local character of area.</p>
<p>Effingham Parish Council</p>		

	<p>The policy should ensure that the densities fully reflect the local character of the surrounding houses in the neighbourhood and the character of the area, for example, whether it is rural or urban.</p> <p>We suggest adding a point d) to 1):</p> <p>d) the type and size of homes identified as needed in the local area, including where this has been identified in a Neighbourhood Plan</p>	<p>Density now addressed within Policy D4: 'Achieving high quality design and reflecting local distinctiveness' which says development proposals are required to reflect appropriate densities following a design-led approach, taking into account factors such as the context and local character of the area. Type and size of homes is addressed by LPSS Policy H1 (1) whilst also considering relevant Neighbourhood Plan policies.</p>
<p>Guildford Residents Association</p>		
	<p>The absence of any specific guidance on acceptable ranges of density is unsatisfactory and we wish to see more definition of what is and is not acceptable.</p> <p>We advocate a limit of six storeys high in the Town Centre. We suggest specific mention of visual impact and height as factors to be taken into account in 'context and local character'. NPPF para 123(b) says 'it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range'. Given the varied character and density of housing across the borough, density ranges could be set based on the prevailing density of existing settlements as identified in the Landscape Character Assessment and Guidance 2009, and proximity to a transport hub.</p>	<p>Policy D4 seeks a design-led approach with an appropriate density for the particular site being an outcome, as opposed to requiring adherence to a predetermined density or density range. Policy D4 says development proposals are required to reflect appropriate residential densities that result from a design-led approach taking into account factors including... heights and sizes for the site... and the context and local character of the area. Also, increased densities may be appropriate if they do not have a detrimental impact on an area's prevailing character and setting.</p>
<p>Merrow Residents Association</p>		
	<p>I support this option but the policy should also have due regard to personal wellbeing, welfare and security We would be expecting:</p>	<p>Policy D4 seeks a design-led approach with an appropriate density for the site being an outcome, as opposed to adhering to a predetermined density/ range. Whilst this approach may result</p>

	<ul style="list-style-type: none"> • a set of structured and challenging target density rings around Guildford and the main villages consciously maximising the density around the hubs and closest to the best travel connections • keeping the suburban and country areas to lower densities where the transport hubs are weaker making better use of energy efficient building structures and design, allowed by higher density building 	<p>in an average density across a site being within such a range, it is often the location of different development forms across a site which are more important in considering whether a proposal is appropriate.</p>
	<ul style="list-style-type: none"> • consideration being given to the quality of life, and their health and safety, for those living in high density developments as this can be compromised as the Covid 19 pandemic has demonstrated 	<p>Proposed Policy D5: 'Protection of amenity and provision of amenity space' requires all new residential developments to have direct access to an area of private outdoor amenity space and flats to have balconies.</p>
	<ul style="list-style-type: none"> • that the Burpham Neighbourhood plan's own housing standards should be recognised. The current wording allows for this outcome but does not yet mandate it with specified densities, which we believe is the only way to achieve optimised results. • a clear distinction between housing density and the height of any development. High density doesn't also mean increase in height particularly where it would affect views out of and into the area. • height limitations should cover all urban development otherwise tower blocks will damage the character of Guildford. There should be a presumption against any further tower blocks in the town centre and the height restriction of no more than 6 storeys and this should be reduced to 3 storeys in the outlying areas of the town- such as Merrow and Burpham. 	<p>Housing standards are set in LPSS Policy H1 'Homes for all'. Neighbourhood plans are recognised in their own right as part of the development plan. Policy D4 says development proposals are required to reflect appropriate residential densities that result from a design-led approach taking into account factors including appropriate heights for the site.</p>
Ockham Parish Council		
	<p>Housing density should be modelled on principles relating to site size, characteristics and location. Inappropriate development in rural settings – such as Former Wisley Airfield (FWA) – where the local character and context would be compromised by high density housing, should be avoided. Town settings where smaller developments can be created and where the infrastructure is already in place would be more appropriate for higher density housing. Optimisation of higher density housing on strategic sites, particularly in rural settings, should take into account the character and context of the surroundings.</p>	<p>Updated policy D4 makes reference to site size, characteristics, location, urban grain, building forms, heights, sizes, context and local character. It also says that increased densities may be appropriate if they would not have a detrimental impact on an area's prevailing character and setting.</p>
Martin Grant Homes		

	<p>We support the policy aim to enable appropriate residential densities in high-quality, design-led schemes. However, paragraph 2.8 states that: “Strategic sites provide the opportunity to have higher densities due to their size and being designed comprehensively with their own identity”. The strategic site allocations including Gosden Hill are located on the edge of Guildford (and Wisley Airfield is in the countryside) and will need to also respect their setting both in terms of the adjacent open countryside and also the adjoining residential neighbourhoods. Therefore, it should not be assumed that higher density development in these locations is always acceptable. Moreover, development within strategic sites will include a mix of lower and higher densities. This will help to create character areas within a site, responding to the differing character in parts of the site, such as proximity to public transport, and also ensuring that a range of homes can be provided. In this context, Policy H4 should seek development at an appropriate density, rather than requiring higher density development without consideration of appropriate densities in individual locations.</p> <p>We oppose imposing minimum densities which has the potential to result in inappropriate higher densities which: can conflict with local character; are in the wrong location in terms of transport; lead to a mix of housing that does not align with market demand and is therefore, undeliverable; and can lead to the creation of imbalanced and unsustainable communities. We support the proposal to seek optimal use of land by building at the most appropriate density whilst taking into account the size, location, context and characteristics of a site, as set out in part 1) of the preferred option. However, we object to part 2) of the preferred option. To promote good design and place-making, we recommend that Policy H4 part 2) encourages or supports higher densities at strategic sites, where appropriate, rather than requiring higher densities unless there are strong reasons why it would be inappropriate.</p>	<p>Agree. Policy H4 is replaced by Policy D4: ‘Achieving high quality design and reflecting local distinctiveness’ and the reference to strategic sites is removed. Policy D4 would need to be considered alongside Policy D1(5) on strategic allocations.</p> <p>Policy D4 reflects a requirement for ‘appropriate residential densities’ that are demonstrated to result from a design-led approach, which would consider factors such the site size as well as the context and local character of the area. It also states increased densities may be appropriate if it would not have a detrimental impact on an area’s prevailing character and setting.</p> <p>Policy D4 seeks a design-led approach with an appropriate density for the particular site being an outcome, as opposed to requiring adherence to a predetermined density or range.</p>
Send Parish Council		
	<p>Disagree. Each site also needs to be considered as to whether it is “sustainable” for the amount of housing proposed. The density should respect the existing landscape, views, and adjacent neighbouring buildings. SPC does not support seeking to maximise density of any sites including Strategic Sites. Reference to Neighbourhood plans.</p>	<p>Sustainability is addressed by Policy S1: Presumption in favour of sustainable development. Policy H4 is now replaced by policy D4 which addresses landscape, views, context and local character. Reference to strategic sites is removed but Policy D1(5) on strategic allocations would need to be considered alongside Policy D4. Neighbourhood Plans are adopted in their own right and part of the</p>

		Development Plan so specific mention in the Local Plan is not necessary.
Woodland Trust		
	The Woodland Trust recognises the potential of higher density development on suitable sites to reduce pressure on sites less suitable for development, including the re-use and redevelopment of previously-developed land. Such redevelopment should seek to preserve existing mature trees and protect existing habitats on biodiverse brownfield sites. Whatever the density of housing, it is important to Integrate green infrastructure and maximise the potential tree canopy cover. In high density housing, space along boundaries, paths and in areas of public space can still be used to accommodate hedgerows, tree roots and canopy growth, and this should be part of the required design standards. Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust <i>Residential developments and trees - the importance of trees and green spaces</i> (January 2019)	Proposed policy D4 expects development to make the most efficient use of land if it would not have a detrimental impact on an areas prevailing character and setting. Policy D4 also requires developments to optimise and enhance nature and respond positively to the prevailing character and landscape. LPDMP proposed policy P8: Woodlands, trees, hedgerows and irreplaceable habitats states site design is expected to incorporate significant trees plus their root structures and understory within the public realm (including ancient and veteran trees and ancient woodland), and to provide green linkages between them wherever possible.
Home Builders Federation		
	The HBF agrees with the Council's preferred option set out in policy H4. We recognise the need to ensure that that optimal use of the land is achieved but it is important to ensure that there is flexibility within policies on density to ensure that the development being proposed is right for the location and topography of the site.	Agree. The efficient use of land is now addressed in Policy D4 and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting. Part 3 of D4 states development must respond positively to topography.
West Clandon PC		
	Reference is made to achieving minimum density but limiting maximum density is also important.	Policy D4 now replaces policy H4 and reflects a requirement for 'appropriate residential densities' that result from a

		design-led approach as opposed to reflecting a predetermined density.
Weyside Urban Village		
	We are supportive of the preferred option for housing density including higher density at strategic sites, however no definitions are provided on what constitutes 'higher density' This could lead to ambiguity over what a high density is. Whilst the same figure will not necessarily be appropriate for each circumstance or site, some form of steer or guidance as to what 'higher density' means would be useful in any policy – e.g 'at least a certain dph'. The SDF SPD could provide local examples of certain densities so any policy can be interpreted.	Policy H4 is replaced by policy D4 which seeks a design-led approach with an appropriate site density being an outcome, as opposed to requiring adherence to a predetermined density or definition of 'higher density'.
	The three criteria around maximising the optimal use of land shouldn't be considered as a definitive list. For example the likely proposed density of WUV isn't comparable of that of the surrounding local area and any policy should reflect that differing densities can sit comfortably next to each other with high quality design. It would be useful to explain in supporting text that density doesn't necessarily meant height. Guidance to encourage innovative house types to achieve density without building high rise development should be included. There should also acceptance that a range of densities across a site would be acceptable to encourage variation and character.	Policy D4 (4) states 'Development proposals will be expected to demonstrate high quality design...' Development proposals are required to reflect appropriate residential densities that result from a design-led approach taking into account factors including heights. This approach is likely to result in well-designed schemes with density varying across large sites. Policy D4 (3) states 'The use of innovative design approaches, including use of materials and construction techniques, will be supported where this presents an opportunity to create new or complementary identities that contributes to and enhances local character.' LPSS Policy D1(5) addressing strategic sites must also be taken into account.
Worplesdon Parish Council		
	Housing density needs to include size of houses.	Density differs to housing sizes. Housing mix, including sizes, is addressed in LPSS policy H1 (1).

Guildford Society

Policy H4 as written appears to have no significant change except to say there should be higher density on strategic sites (there were none in the 2003 Plan). We could argue that the sites are edge of town and not different per se to other suburbs. There is a useful list of 'Transport Interchanges', not in the 2003 Plan. The 2003 Plan Policy H10, 'New Residential Development' was deleted by the SoS in 2007 - it contained densities of 30 and 50 DPHa. The Society believes this policy is dangerously weak and should be strengthened considerably:

Firstly: Sites in the LPSS show how housing demand vs. OAN, together with assumed windfall, can be achieved. The Dwelling numbers for the LPSS sites should be translated as a policy i.e. the LPSS numbers should be taken as the dwelling numbers with a tolerance of +/- 5%. This will prevent LPSS sites being subject to debate on raising dwelling numbers with impact on height and DPHa.

Secondly: The policy should be enhanced to manage effectively DPHa numbers for new sites by referencing to the surrounding area. Policy H4 establishes a principle for transport hubs of considering height in area around the transport hub. The society proposes that this principle can be adapted to allow DPHa for new developments to be easily considered.

We thus propose that for new sites (5 Dwellings or more) not within the LPSS, that the DPHa for a site should take into account of the local area; and thus should match the calculated DPHa for the local area within a 300metre radius of the site within a tolerance of +/- 25%.

Thirdly: There should be a policy on Height in the Borough.

Policy H4 is now replaced with Policy D4. Reference to transport interchanges and strategic sites is deleted. Policy D4 reflects a requirement for appropriate residential densities that result from a design-led approach, which would consider factors such as the context and local character. This approach is likely to result in density varying across/within large strategic sites. Development must also respond positively to landscape and topography.

It is not considered appropriate to translate the dwelling numbers for the LPSS into a policy. Each planning application must be considered on its own merits, which includes consideration on the height of buildings and dph. New residential development must be guided by good design principles and not by set dph figures. Often, when a maximum figure is set that becomes the guiding factor, at the expense of design. An appropriate site density should result from a design-led approach, rather than a predetermined density or mathematical calculation.

	<p>Policy H4 helpfully defines Transport interchanges, an attractor of development, commercial activity and housing. The 500m rule is a blunt definition as it potentially allows higher density in unsuitable areas. Reword text as: <i>Higher density development in the Town Centre, strategic sites or within the nominated area (normally 500 metres) of existing or planned transport interchanges should include the optimum mix of Commercial, Retail, Dwelling Space, unless there are strong reasons why it would be inappropriate. Scale even though denser and higher should respect the surrounding area. Denser development at transport interchange will normally allow density to be reduced in other parts of the area for a new development.</i></p>	<p>The reference to strategic sites, 500m and transport hubs is removed from the proposed policies as it is considered unnecessary. Policy D4 advocates a design-led approach which includes consideration of scale and the character of the local area.</p>
	<p>The Society proposes that heights for buildings should respect the height of surrounding buildings and should also ensure the underlying landform can continue to be understood. We propose that the presumption for the borough is that buildings over 6 stories high in town centre and 4 stories in other areas will be allowed only on an exception basis.</p>	<p>Policy D4 says development proposals must reflect appropriate residential densities that result from a design-led approach taking into account factors including heights and context.</p>
<p>Blackwell Park Ltd and the University of Surrey</p>		
	<p>Part 2 of the preferred option states that strategic sites should have higher density development. This will depend on the nature of each of the strategic sites. Design, following site analysis and evaluation, is likely to see density vary across/within each site from low to high, in response to existing site character and context. The desire to see higher density development at strategic sites should not override the need to properly and robustly assess each site and its constraints and opportunities to arrive at an appropriate density profile.</p>	<p>Agree. This is consistent with the new approach in Policy D4, which requires appropriate residential densities to result from a design-led approach. This would also need to be considered alongside LPSS Policy D1(5) on strategic allocations.</p>
<p>Cranley Road Residents Association</p>		
	<p>500 m of interchange is too crude a measure for a local policy. Eg Historic High Street and Cathedral site should not be developed at high density. The circumstances in which higher density in the centre or within 500 m of interchanges may be inappropriate in a Guildford context – due to height or loss of green character - should be set out as including:</p> <ul style="list-style-type: none"> • To protect strategic views and townscapes. • To protect distinctive green approaches (soft green edges of settlements and green corridors along key entry routes to settlements) which are a distinctive trait of Guildford. • To protect established character near transport hubs in rural settlements. • To avoid the route of the sustainable movement corridor becoming a linear high-rise wall carving up the town scape of Guildford. 	<p>Policy H4 is replaced by Policy D4 'Achieving high quality design and reflecting local distinctiveness'. Policy D4 addresses the many of the points raised in the comments in criterion 1, 3, 4 and 5 such as significant views, nature, movement, public space, landform, hard landscape and soft landscape, site characteristics, context and local character. The 500 m criterion is deleted.</p>

	<p>The density policy should recognise the need for any scheme to make space for nature, climate change resilience and adaptation, green character, and to provide amenity space for health and wellbeing – a need reinforced by the covid lockdown.</p>	<p>LPSS Policy D2 addresses climate change and Policy ID4 addresses green infrastructure. Proposed Policy D5: 'Protection of amenity and provision of amenity space' requires all new residential developments to have access to private outdoor amenity space and flats to have balconies.</p>
	<p>Reasons why higher density may be inappropriate should be exemplified in the policy.</p>	<p>It is not appropriate for a policy to give examples.</p>
<p>Holy Trinity Amenity Group</p>		
	<p>Replacement of modest, low-density, housing with luxury mansions. Since the introduction of the NPPF in 2012, there has been no Guildford policy relating to housing density; the Council have been remiss in not setting their own rules on dwelling density. Prior to 2012 the 2003 plan followed the government rules of density to be between 30 and 50dph, except that densities lower than 30 might be accepted in exceptional circumstances and higher densities were allowed near the centre. This worked reasonably well, and, although it resulted in some increase of density in established residential areas, it was regarded as fair. As far as we know the potential for inserting new dwellings in low density established residential areas has never been fully analysed. When the Residential Design Guide was introduced in 2004 an additional policy was added that allowed densities higher than 50dph within 800m of the centre; while we accepted the desirability of increasing density in the centre we considered the 800m to be too high – it meant that most of our established residential area fell within this limit. In fact, the flood of redevelopment that we feared did not occur.</p> <p>Prior to 2012 no new low-density development was allowed and the more recent wasteful replacement of modest dwellings with mansions did not happen. The amount of in-filling in our area has not been unreasonable. It has been accepted that some raising of density can help stop widespread building in the Green Belt. Since 2012 we have seen a number of demolitions with rebuilds as mansions, and some “garden” developments at very low densities. This financial and material investment would have funded many smaller dwellings that we desperately need. This trend is contrary to government policy and it is disappointing that GBC have not tackled it before. The reintroduction of a policy setting a minimum and maximum density would overcome this problem. To have no set rules for housing density would be a failure to properly control this and leads to inconsistency and injustice when one applicant is allowed something which is then refused to someone else. Densities in designated</p>	<p>Through Policy D4: 'Achieving high quality design and reflecting local distinctiveness' the Council sets out its approach to dwelling density. An appropriate density on a site (or parts of a site) should result from a design-led approach. It is an outcome of a process, as opposed to reflecting a predetermined density or applying a mathematical calculation to a site. Policy D4 now reflects a requirement for 'appropriate residential densities' that are demonstrated to result from a design-led approach, which includes consideration of certain factors. Rather than density being the driving force behind a scheme, it is good design that is at the forefront.</p> <p>Smaller dwellings are addressed by policy H1 (1) Homes for all.</p> <p>Each scheme is considered on its own merits, but the policies will help ensure a consistent approach. The strategic</p>

	<p>sites are already set in LPSS. We note that limits for existing residential areas are not even considered as an alternative option; only the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges are considered and these only qualitatively.</p> <p><u>Insertion of extra dwellings into already dense areas.</u> The previous 50dph maximum limit gave some protection against already high-density areas, such as areas of small Victorian housing, becoming even more cramped with inadequate open space.</p> <p>We would ask for the previous 30-50dph limits to be reinstated, except for:</p> <ul style="list-style-type: none"> • Designated sites where dwelling numbers are already specified • Designated town centre - a limit of 130dph would be reasonable • Area within 400m of the centre boundary, or the main station - 85 dph. • No extra dwellings to be allowed in Conservation Areas where the average density is already 50dph or higher. <p>Only the main Guildford station is a true hub with routes in all directions. We do not agree to having no policy. This issue cannot be left open for argument and inconsistency</p>	<p>site, town centre and 500 metres of transport hub criterion have now been removed from the proposed policies as they are considered unnecessary.</p> <p>The efficient use of land is addressed in Policy D4 and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting. A blanket refusal of applications in Conservation Areas with a dph of 50 plus is not a justified policy approach. Policy D4 and emerging policies will ensure only appropriate development is built in CA's.</p>
Merrow Residents Association		
	<p>We agree with the preferred option. We would be expecting:</p> <ul style="list-style-type: none"> • a set of structured and challenging target density rings around Guildford and the main villages • consciously maximising the density around the hubs and closest to the best travel connections • keeping the suburban and country areas to lower densities where the transport hubs are weaker 	<p>Density is now addressed in Policy D4 which requires appropriate residential densities that result from a design-led approach, as opposed to reflecting a predetermined density or applying a mathematical calculation. Reference to transport hubs has now been removed as considered unnecessary.</p>
	<ul style="list-style-type: none"> • making better use of energy efficient building structures and design, allowed by higher density building • consideration being given to the quality of life, and their health and safety, for those living in high density developments as this can be compromised as the Covid 19 pandemic has demonstrated 	<p>LPSS Policy D2: Climate change, sustainable design, construction and energy addresses energy efficiency issues. Quality of life is addressed by various policies including place shaping, requiring well designed homes and good amenity standards.</p>
	<p>The Burpham Neighbourhood plan's own housing standards should be recognised. The current wording allows for this outcome but does not yet mandate it with specified densities, which we believe is the only way to achieve optimised results</p>	<p>Housing space standards are addressed by LPSS policy H1(3) Homes for all. The Burpham</p>

		Neighbourhood Plan is adopted its own right and part of the Development Plan, and appropriate weight given to its component parts, so specific mention in the Local Plan would not appear to be necessary.
	It is critically important to ensure that there is a clear distinction between housing density and the height of any development. High density doesn't also mean increase in height particularly where it would affect views out of and into the area. Therefore, a policy covering the density of future developments cannot be considered without also considering height limitations. These should cover all urban development otherwise tower blocks will damage the character of Guildford. There should be a presumption against any further tower blocks in the town centre and the height restriction should be clearly defined. We take the view that no new building in the borough should be more than 6 storeys and this should be reduced to 3 storeys in the outlying areas of the town- such as Merrow and Burpham.	Policy D4 (5) addresses heights and says development proposals are required to reflect appropriate residential densities that are demonstrated to result from a design-led approach taking into account factors including...heights and sizes for the site, and the context and local character of the area. Proposed Policy D4 (3) addresses significant views.
Normandy Action Group		
	<p>Normandy Action Group disagree. The proposed approach to density lacks any ability to ensure that the density of a proposed development is appropriate given the environmental, landscape, character and sustainability constraints and/or opportunities of individual sites. This has resulted in high density housing being built in 'edge of village' settings in relatively low sustainability. In Flexford this has contributed to the development of affordable housing in Beech Lane, resulting in flooding of properties and only resolved via the local Flood Forum after resistance to the necessary investment from GBC.</p> <p>NAG supports the requirement to ensure that the development capacity of sites should avoid the necessary further release of Green Belt land. However, this must not be at the expense of the amenity of local residents and the character of the surrounding area. The second part of the preferred option for housing density states that the policy will require: Higher Density development in the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges, unless there are strong reasons why it would be inappropriate. The listed transport interchanges include the existing outlying stations of Ash, Ash Vale, North Camp and Horsley, in addition to the proposed stations at Guildford East (Merrow) and Guildford West (Park Barn). NAG does not consider that 500 metres from transport interchanges would be suitable for high density development. For smaller settlements 500m</p>	<p>The policy approach has now changed. Policy D4 'Achieving high quality design and reflecting local distinctiveness' now reflects a requirement for 'appropriate residential densities' that are demonstrated to result from a design-led approach including consideration of context and local character.</p> <p>Flooding issues are not within the remit of this policy.</p> <p>The reference to strategic sites and 500m from transport hubs is removed from the proposed policies as it is considered unnecessary.</p> <p>The efficient use of land is addressed in Policy D4 and increased densities</p>

	<p>would be outside the settlement boundary and totally inappropriate for high density housing and this buffer would include areas of low density housing and would include large areas of existing unallocated Green Belt land. The transport interchanges wording should ensure that the policy is appropriate for the individual circumstances of existing settlements. Many of the new large sites in the Local Plan are areas of former Green Belt land with significant constraints, not least that of landscape or character impact.</p>	<p>may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting. Policy D4 addresses landscape and local character.</p>
Burpham Community Association (BCA)		
	<p>Do you agree with the preferred option to address housing density in Guildford? Yes, but...</p> <ol style="list-style-type: none"> 1) Further consultation should be held to determine what density is appropriate for each of the strategic sites 2) It is not valid to consider Guildford East (i.e. Merrow) Railway station as a transport interchange until/unless there is a binding commitment to build it – at present this seems very unlikely. 	<p>The reference to strategic sites and transport hubs is removed from the proposed policies. Policy D4 'Achieving high quality design and reflecting local distinctiveness' requires appropriate residential densities that result from a design-led approach. This will help determine the appropriate density for strategic sites.</p>
Compton Parish Council		
	<p>We think that Policy H4 should also take into account the capacity of the local road network and supporting infrastructure (sewers).It is unclear why minimum density requirements are restrictive and why the impact on views, which are crucial to the character and setting, apply only to the town centre and not to wider Guildford. 'Appropriate' density is vague and offers no basic framework.</p>	<p>Capacity of local infrastructure would be considered through Policy ID1 'Infrastructure and delivery'. Policy D4 addresses significant views (to and from). Policy D4 gives a framework for a design-led approach for new development which will help achieve an appropriate density for the site.</p>
Councillor Ruth Boswell		

	<p>I do not agree with this. 2.4 – quote: the Nat Design Guide states that “to optimise density it may be necessary to provide public transport infrastructure or improve local transport services” - This is very relevant to Guildford. In consultations lack of infrastructure has been the main cry of everyone. What are the metrics to prove need? - As one example, the public consultation on Garlick's Arch – commented that there was not nearly enough infrastructure to support the number of dwellings proposed. But against what metrics and who is responsible for determining these? The developers? GBC?? A criticism of the LP, often heard, is that it is wholly lacking in infrastructure offerings - it proposes thousands of homes but without the wherewithal for people to live their lives adequately.</p> <p>Appendix 2 p64 - "in the town centre there are more limited opportunities for developments yet it is a sustainable location so housing density needs to be optimised."</p>	<p>An appropriate density on a should result from a design-led approach. It is an outcome of a process, as opposed to reflecting a predetermined density or applying a mathematical calculation to a site. Policy D4 now reflects a requirement for ‘appropriate residential densities’ that are demonstrated to result from a design-led approach, which includes consideration of these informants. Infrastructure is addressed by LPSS policy ID1 and Appendix 6: Infrastructure schedule.</p>																		
	<p>I even consider Compulsory Purchase and believe this should be considered although thought to be time consuming and expensive. In my mind I cannot rid myself of a vision to create a new town within the current Town Centre limits by CPO, demolishing much of the Victorian tat and replace it with well designed good housing which would be sustainable, near transport offerings and not require use of Greenbelt land. The LP Strategy and Sites document page 28 suggests CPO. Therefore, I would not agree to the first proposal on page 13. but would ask for the TC to be considered for more housing and less in the greenfield areas.</p>	<p>Reference to higher densities in the Town Centre has been removed. Compulsory purchase powers are not within the remit of this policy. LPSS policy S2 addresses delivery of development and regeneration within Guildford Town Centre and criterion (4) addresses CPO.</p>																		
Portland Capital																				
	<p>Portland Capital are supportive of promoting higher density residential development in sustainable locations such as the town centre.</p> <p>GBC's Annual Monitoring report (2018-2019) identifies: Table 1: Previous Housing Completions</p> <table border="1" data-bbox="358 1133 1597 1372"> <thead> <tr> <th>Monitoring Period</th> <th>2015/16</th> <th>2016/17</th> <th>2017/18</th> <th>2018/19</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Completions</td> <td>387</td> <td>294</td> <td>299</td> <td>351</td> <td>1,331</td> </tr> <tr> <td>Delivery against target (562)-175</td> <td></td> <td>-268</td> <td>-263</td> <td>-211</td> <td>-917</td> </tr> </tbody> </table>	Monitoring Period	2015/16	2016/17	2017/18	2018/19	Total	Completions	387	294	299	351	1,331	Delivery against target (562)-175		-268	-263	-211	-917	<p>The National Design Guide indicates that ‘built form is determined by good urban design principles that combine layout, form and scale in a way that responds positively to the context. The appropriate density will result from the context, accessibility, the proposed building types, form and character of the development.’ In this light, a prescriptive approach to setting</p>
Monitoring Period	2015/16	2016/17	2017/18	2018/19	Total															
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	<p>Table 1 demonstrates that there has been an historic undersupply of housing in Guildford. The annual target of 562 has not been met in a single year of the plan period (2015 – 2034), providing an undersupply of 917 homes to date.</p> <p>Section 11 of the NPPF relates to making effective use of land. Paragraph 123 states: <i>Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that <u>planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.</u> In these circumstances:</i></p> <p><i>a) <u>plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;</u></i></p> <p><i>b) <u>the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and</u></i></p> <p><i>c) <u>local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).</u></i></p> <p>In the context of the historic undersupply of housing and NPPF policy identified above we would suggest that it is entirely appropriate to have a specific policy covering planning densities, particularly where this seeks to deliver higher density housing within the town centre or within 500m of existing or planned transport interchanges in line with the NPPF. We request that the preferred option should go further to encourage an uplift in densities in appropriate locations by setting out minimum density ranges, consistent with the NPPF and reflective of under delivery. As per point C of NPPF paragraph 123; site size, urban grain and context should be reviewed on a site by site basis, with a flexible approach to daylight and sunlight, where it would inhibit making efficient use of a site.</p>	<p>densities is not considered appropriate. An appropriate density is an outcome of a process, as opposed to reflecting a predetermined density or applying a mathematical calculation to a site. Policy D4 now reflects a requirement for appropriate residential densities that result from a design-led approach, which includes consideration of these informants. Whilst in many cases (not all) this approach (as per D4) may result in an average density across a site being within such a range, it is often the location of different forms (and densities) of development across a site, which are more important in considering whether a proposal is appropriate. Reference to the Town centre and 500 metres is deleted.</p> <p>Policy D4 addresses the expectation for proposals to make efficient use of land if it would not have a detrimental impact on an area’s prevailing character and setting (in line with the NPPF para 122 d). Daylight and sunlight is addressed in proposed Policy D5: ‘Protection of amenity and provision of amenity space’ which requires development to not have a detrimental impact on access to daylight and sunlight.</p>
Residents for Guildford and Villages / Guildford Green Belt Group		
	Does not agree. As set out within the previous section, it is concerning that this is the first policy within the plan, and it is considered that it sets a misleading tone for the rest of the	Agree. Policy H4 is deleted and density issues addressed within policy D4

	policies within the DMP. It is considered that this policy is more concerned with Design and should therefore be relocated to chapter 5 where it can be read alongside other such policies.	'Achieving high quality design and reflecting local distinctiveness'.
	The supporting text for the policy provides three challenges for Guildford. There needs to be reference to, or recognition of, Guildford as a Gap Town, and of its historic villages, with significant constraints in terms of heritage, conservation, and character.	Part 2 of the LPSS gives key facts about the borough and further details on specific factors including heritage.
	<p>A much stronger link between achieving appropriate density and protecting character is required. The proposed approach to density lacks any ability to ensure that the density of a proposed development is appropriate given the environmental, landscape, character and sustainability constraints and/or opportunities of individual sites. This lack of flexibility has resulted in high density housing being built in 'edge of village' settings in relatively low sustainability settings (examples are Garlick's Arch and Tannery Lane, Send developments). R4GV supports the requirement to ensure that the development capacity of sites is optimised, particularly to the extent that this avoids the necessary further release of green belt sites. However, this is expressly caveated that such optimisation must not be at the expense of the amenity of local residents and the character of the surrounding area.</p> <p>Paragraph 123 of the NPPF sets out the approach to density and site optimisation where part b sets out the following: The use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range.</p>	Policy D4 expects proposals to make efficient use of land if it would not have a detrimental impact on an area's prevailing character and setting (in line with the NPPF para 122 d). With regard to edge of village settings, the criterion in policy D4 focus on the character of the area and enable more suitable development taking into account context, character and setting of an area. Policy D9(5) b) requires infill development in villages to ensure that the transitional character of edge of village/settlement areas is not lost and that hard urban forms are not introduced in semi-rural environments
	<p>In order to be found sound, the DMP must be consistent with national policy. Paragraph 122 of the NPPF provides context on making the most efficient use of land: Planning policies and decisions should support development that makes efficient use of land, taking into account:</p> <ul style="list-style-type: none"> • <i>the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;</i> • <i>the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and</i> • <i>the importance of securing well-designed, attractive and healthy places.</i> <p>The preferred option is inconsistent with national policy due to the lack of clarity regarding the maintenance of the character of existing areas.</p>	The National Design Guide indicates that 'built form is determined by good urban design principles that combine layout, form and scale in a way that responds positively to the context. The appropriate density will result from the context, accessibility, the proposed building types, form and character of the development.' Revised policy D4 is consistent with the NDG & NPPF.
	The preferred option to housing density sets out a number of matters to take into account in achieving appropriate densities. The definitions of several of the key phrases are defined in detail within the supporting text. There is no recognition that density of a site is not merely a mathematical calculation and is not a basis on which to decide whether a development is	Agree. A site density should result from a design-led approach and be an outcome of a process, as opposed to reflecting a predetermined density or

	suitable for any particular site. On smaller sites a minor alteration in size or unit numbers can have a disproportionate effect on the calculation of density for a site.	applying a mathematical calculation. Policy D4 now reflects a requirement for 'appropriate residential densities' that result from a design-led approach.
	The wording of paragraph 5.41 within the supporting text relating to Policy D9: Residential Intensification is helpful and pragmatic regarding character. A similar paragraph is required regarding policy H4.	Paragraph 5.41 relates to (inset) villages and is specific to policy D9 so unnecessary to repeat in policy D4.
	Applicants must be instructed to read the DMP as a whole and have reference to other DMP policies specifically: <i>policy D4, policy D5, policy D8, policy D9, policy D16, policy D17, policy D18, policy D20, policy ID6, policy ID11 Parking Standards.</i>	The Local Plan must be read as a whole. This is stated in the LPSS paragraph 1.11.
	It is considered that the council should incorporate a range of densities across the borough to reflect character rather than a general approach to this complex and important area. A good e.g is the Density Study July 2019 by Elmbridge Borough Council. There is a lack of guidance in how character will be considered and the DMP would not be effective or positively prepared if no further work is undertaken. At present GBC is reliant on the Residential Design Guide SPD to guide decisions on character. This document dated July 2004 is out of date when considered against the NPPF and associated guidance on design that has been produced since it was adopted. The character typologies within the Local Distinctiveness and Character Chapters are generic and not specific enough to guide development in detail. Many adopted Neighbourhood Plans contain detailed reference to character and density and these should be referenced where appropriate. Alongside Neighbourhood Plans, and with specific reference to areas not covered, GBC should be bringing forward an up-to-date Character Study. Any Character Study must be fully incorporated into the DMP so that full weight can be placed upon it in the determination of planning applications. The preparation of a full Character Study would take some time to develop and in the interim the Landscape and Townscape Study could be used to guide the determination of planning applications.	Policy D4 places an emphasis on the importance of the character of areas. It reflects a requirement for 'appropriate residential densities' that are demonstrated to result from a design-led approach, which would consider factors such as the context and local character of the area. Criterion 3) states that development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place. Development proposals should respond positively to the history of a place, significant views (to and from), surrounding context, built and natural features of interest, prevailing character etc. We may need to produce local design codes where appropriate to accord with the National design code. However this/character studies sit outside of the LPDMP process.
	At local level, character has been extensively considered within existing and emerging Neighbourhood Plans as follows:	Neighbourhood Plans are adopted in their own right. They are part of the

Neighbourhood Plan	Approach to Character	<p>Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts, so replication in the Local Plan would not appear to be necessary.</p> <p>The Transport hubs and 500 metres criterion is no longer incorporated in the proposed policies. The reference to strategic sites is also removed as it is considered unnecessary.</p> <p>Infrastructure is addressed by LPSS policy ID1 and Appendix 6: Infrastructure schedule.</p> <p>The efficient use of land is addressed in Policy D4 and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting. Policy D4 reflects a requirement for 'appropriate residential densities' that result from a design-led approach, which would consider factors such as the site size as well as the context and local character of the area. This approach is likely to result in density varying across/within these large greenfield strategic sites from lower to higher. This would need to be considered alongside Policy D1(5) on strategic allocations.</p>
Burpham	Approach to character set out in appendix 2	
West Horsley	Approach to Character set out in appendix C	
East Horsley	Significant reference to Housing Design Styles	
Lovelace	Design guide in appendix C5	
Effingham	Separate Village Design Statement	
Send	Separate Character Assessment	
West Clandon	Separate Character Assessment	
Puttenham	Separate design guide	
<p>Any updated policy in relation to density must make reference to the significant evidence base for character in individual neighbourhood plan areas.</p> <p>The definitions set out the list of transport interchanges which include the Guildford stations but also the stations of Ash, Ash Vale, North Camp, and Horsley and the proposed stations at Guildford East and Guildford West It is not considered that a distance of 500 m from the transport interchanges would be universally suitable for high density development. Even in the centre of Guildford, a distance of 500m from the main stations would be areas of relatively low density family housing, often in conservation areas or other such restrictions. Other stations eg Horsley a distance of 500m would be outside of the settlement boundary and inappropriate for high density housing. Appendix 3 of the Part 1 Local Plan shows maps with the 500m buffer around transport interchanges. In many instances this buffer would include areas of low density housing and large areas of unallocated green belt land. Furthermore, the provision in relation to planned transport interchanges risks development long before the appropriate transport infrastructure is implemented which would lead to significant issues for future residents. The policy wording on transport interchanges should be fundamentally reviewed to ensure that the policy is appropriate for the individual circumstances of existing/proposed settlements. Where the transport interchange has not been built/opened, it would be inappropriate to bring forward significant high density housing until the infrastructure is provided. Many of the strategic sites are areas of former green belt land and in all instances have significant constraints e.g landscape or character impact. It is therefore inappropriate for high density on a strategic site with no reference to other factors. Wording should clarify this approach with links to other plan policies</p>		
West Horsley Parish Council		

	<p>Agree, providing reference is made to Neighbourhood Plans. This policy needs much clearer guidelines and detail – it is too loose.</p> <ol style="list-style-type: none"> 1. Under the preferred option at point 1c there should be reference to the character of the landscape setting which is equally important. 2. Specific densities for specific ‘characters/types’ of areas needs to be provided within the proposed policy. 3. Planning Officers are at a disadvantage is there is no guidance on this which leads to highly inappropriate densities proposed by developers with no regard to local character. 4. It would be helpful within this policy to explain why Guildford Borough is so heavily constrained re Green Belt, Woodland etc which will influence density. 5. Reference to Neighbourhood Plans should be included as these give specific local knowledge and density measurements that must be taken into consideration. 	<p>Neighbourhood Plans are adopted in their own right, are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole, so replication in the Local Plan is not necessary. Density issues are now within proposed Policy D4. Criterion (3) states development should respond positively to context, character and landscape. It requires ‘appropriate residential densities’ that result from a design-led approach, which considers context and local character. Throughout the plan constraints facing Guildford are recognised.</p>
Other respondents		
	<p>The text and Blue Box say there should be higher density on strategic sites. These sites are on the edge of town and not different per se to other suburbs. They are certainly not suitable for densities which might be reasonable in the town centre. High density is not necessary to meet the requirements of the SPSS. The three SPSS sites Blackwell Farm, Wisley Airfield and ~Gosden Hill Farm are all scheduled for about 20 dpha overall, which certainly does not necessitate high density. The references to strategic sites in H4 should be removed. They would lead to high buildings in areas where they would be completely out of character and would intrude on the surrounding countryside. The list of ‘Transport Interchanges’, not in the 2003 Plan, is very useful.</p>	<p>The reference to strategic sites and transport interchanges is removed. Policy D4 now requires ‘appropriate residential densities’ that result from a design-led approach, which considers factors such as the site size, context and local character. This would need to be considered alongside Policy D1(5) on strategic allocations.</p>
	<p>Where a transport interchange is unlikely to attract new users for reasons such as uncompetitive cost, overcrowding or simply that the station has not yet been built or additional capacity has not been delivered, this may lead to additional car journeys. This, and other exceptions where the policy conflicts with other aims, could be taken into account by expanding on the “strong reasons why it would be inappropriate”.</p>	<p>The reference to transport interchanges is removed from the proposed policies as it is considered unnecessary.</p>
	<p>There is no detail on housing density for sites which are not strategic sites or in the town centre. Given that the Local Plan makes provision for approximately 1,200 dwellings on</p>	<p>The refence to strategic sites is now removed. Policy D4 requires all</p>

	<p>nonstrategic sites within and as extensions to existing villages, some inset from the Green Belt, I would be concerned about the impact of monoculture development within those non-strategic sites on the Green Belt – the kind of new-build developments homes, dependent on cars, that have sprung up in many rural areas on the outskirts of existing villages. Applying housing density policy to these non-strategic sites could be one way of controlling that.</p>	<p>proposals to take a design-led approach and respond positively to their surrounding context and prevailing character. This would need to be considered alongside Policy D1(5) on strategic allocations.</p>
	<p>I object to maximise density of Strategic Sites. The density should respect the existing landscape, views, and adjacent neighbouring buildings. I object because each site also needs to be considered as to whether it is “sustainable” for the amount of housing proposed.</p>	<p>The strategic sites reference is now removed. Policy D4 requires a design-led approach where development responds positively to significant views context, character, landscape and topography. This would be considered alongside Policy D1(5) on strategic allocations.</p>
	<p>With increased density, height restrictions of five to six storeys across Guildford and its surroundings would make it possible to avoid tower blocks, which spoil the character of Guildford and spoil views within and to the town, and views to and from the Surrey Hills AONB. Regarding increased density around transport hubs, a hub is where trains are changed with routes going off in different directions. London Road Station is a small station and does not qualify as a hub anymore than a bus stop.</p>	<p>Policy D4 (5) requires proposals to reflect appropriate densities taking into account appropriate heights for the site. Policy D4 (3) addresses significant views (to and from). The transport hubs reference is now removed.</p>
	<p>It does require that a lot more oversight and careful explanation, seen the less prescriptive way decisions are being made for each particular case.</p>	<p>The reasoned justification for Policy D4 will explain the policy in detail.</p>
	<p>In the draft SDF SPD, there were suggested densities for the planned developments. Will these be used. Without the widening of the A3, the building of the Blackwell Farm Estate would cause problems in and around Guildford. With the Farnham Road being just a single flow in each direction, this road will be completely unsuitable for additional traffic. There will be numerous empty shops and buildings in and around the centre of Guildford. All this vacant space could be partly used for housing which would not have an adverse impact on the town or the environment. There is also the problem of water supply. Thames Water have stated they cannot increase supply for the Guildford area, and they ran short of water just 2 weeks ago and had to supply tankers and bottled water for several days to numerous households.</p>	<p>Policy D4 requires ‘appropriate residential densities’ that result from a design-led approach, which considers factors such as the site size, context and local character. Traffic and infrastructure are addressed by LPSS policies ID1, ID2, ID3. Empty shops and buildings and water supply are not within the remit of this policy.</p>

	No due to change in retail and office sectors. Buildings could be reused for housing within actual town centre instead of intrusive new build in already overstretched community.	Conversions of buildings to housing alone will not meet the overall need for additional housing within the borough.
	I agree with the council's preferred policy which will encourage higher densities in the town centre and within 500 metres of transport interchanges and that the policy should allow for a degree of flexibility. However I believe that a policy regarding the density of future developments cannot be considered without also considering height limitations . I strongly believe that, to preserve the character of Guildford, height limitations should be considered on all urban developments otherwise tower blocks could quickly erode the character of Guildford. There should be a presumption against any further tower blocks in the town centre and the height restriction should be clearly defined (e.g. limited to five storeys).	The Town centre, 500 metres and transport interchanges criterion are now deleted. Policy D4 says development proposals are required to reflect appropriate residential densities that are demonstrated to result from a design-led approach taking into account factors including appropriate building forms & heights for the site.
	I do not agree that any development within 500 metres of an existing or planned transport interchange to develop at high density - developers do not need any encouragement to go for high density, they will do this automatically. Guildford is too historic, roads too narrow and gradients are often too steep to warrant this type of developing. The infrastructure of existing road and access to GP surgeries are often overlooked. Woking has rules in its planning documents regarding developing on a steep gradient, particularly when near other buildings. Has Guildford now implemented something similar, or is this being considered? Considering the topography of Guildford this should be a high priority.	The Town centre, 500 metres and transport interchanges criterion are now deleted. Infrastructure is addressed by LPSS policy ID1 and Appendix 6: Infrastructure schedule. Policy D4 states 'Development should respond positively to the history of a place...landscape and topography.'
	The housing density is much too high for Guildford, and should be reduced to half what is proposed. Higher density would be possible on urban brownfield sites. However the local plan has failed to identify sufficient brownfield sites.	Updated Policy D4 requires appropriate residential densities that result from a design-led approach.
	<p>Yes. Flexibility is a more sensible approach than a rigidly prescriptive one, provided due account is taken of the factors you mention, namely:</p> <ul style="list-style-type: none"> a) the site size, characteristics and location, b) the urban grain of the area and appropriate building forms and sizes for the site, and c) the context and local character of the area <p>This will be of particular importance in the villages now 'inset' from the Green Belt, where inappropriate densities would have an adverse impact on the local area as a whole. Good judgment will be needed if this is to be avoided.</p>	Updated Policy D4 says development proposals are required to reflect appropriate residential densities that result from a design-led approach taking into account the site size, characteristics and location, urban grain and building forms, heights and sizes, context and local character. Policy D9 addresses residential infill development proposals.

	<p>I am concerned as to the density design and other aspects of development in the INSET villages. It would not be appropriate to fix levels of density at the same levels as those of the town. Infilling can be carried out in a sensible and sensitive manner but without an overall density level it would be difficult to 'draw the line' . there also needs to be guides on roof height etc. there is a tendency in modern design to include a roof height that would allow for roof extensions in the future. In some properties allowed in my village this has the effect of a 3rd story. quite out of keeping in the area and imposing. Setting a max for roof height ,not to be exceeded except in exceptional circumstances would be useful. Back gardens are presently being offered up for not one but 2 dwellings ..in those circumstances roof height and density are very important</p>	<p>Updated Policy D4 says development proposals are required to reflect appropriate residential densities that take into account appropriate heights for the site and the context and local character of the area. Policy D9 seeks to address this by reflecting design requirements and expectations regarding residential infill proposals including in villages.</p>
	<p>Agree. High density should not mean unlimited overall height. In the town centre this should be no more than ten storeys in very limited circumstances, and then only when such height does not adversely affect any development's setting and impact on heritage buildings and adjoining conservation areas. GVG would argue that the topography and current built environment of the town indicates that a general maximum of six storeys would best preserve the town in its setting and properly defer to its heritage.</p>	<p>Updated Policy D4 says development proposals must reflect appropriate residential densities that take into account appropriate heights, context and local character. It states development should respond positively to the history of a place, context, character and topography. Other local plan policies address the impact of development on heritage.</p>
	<p>Agree with the aims, but want to see more specific guidance, taking into account the variation in character of parts of the borough. Building height should be restricted in the town centre, preferably to six storeys.</p>	<p>Updated Policy D4 requires development proposals to reflect appropriate residential densities that take into account appropriate heights, the context and local character.</p>
	<p>Where a transport interchange is unlikely to attract new users for reasons such as cost, overcrowding, it's not built etc this may lead to additional car journeys. This could be taken into account by expanding on the "strong reasons why it would be inappropriate".</p>	<p>Reference to transport interchanges has now been deleted.</p>

Policy H5 Housing extensions and alterations		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Environment Agency		
	<p>1. Disagree with preferred option. We note paragraph 2.16 does not state that householder extensions and alterations will also be covered by Policy P4: Flooding, flood risk and groundwater protection zones. This should be included because housing extensions in Flood Zone 3 and 2 must consider flood risk. Whilst Policy P4 does cover all development in areas at medium or high risk of flooding, in order to strengthen Policy H5 we recommend the following is included. This will help to ensure that flood risk is not increased within the borough, as per paragraph 163 of the NPPF. <i>Flood risk assessment (FRA)</i> In accordance with paragraph 163 of NPPF a site-specific flood risk assessment (FRA) should be provided for all development in Flood Zones 3 and 2. This includes change of use and householder extensions.</p> <p><i>Change of use</i> -In accordance with the Flood Zone and flood risk tables 1, 2 and 3 of the Planning Practice Guidance (PPG), change of use proposals may involve an increase in flood risk if the vulnerability classification of the development is changed.</p> <p><i>Minor development/householder extensions</i> 'Minor' development (as defined by the TCP- Development Management Procedure Order 2015) such as householder extensions, in Flood Zones 3 and 2 is covered by our flood risk standing advice (FRSA), unless it is located within 20 metres of a main river.</p> <p>2. <i>Cumulative impact</i> - Areas of the borough that are at a high risk of flooding and receive multiple applications for minor extensions may have a cumulative impact on flood risk, increasing it elsewhere.</p>	<p>1 & 2. Any proposals will need to be assessed in accordance with the development plan. The plan must be read as a whole - it is unnecessary to cross reference policies. Policy P4 does cover all 'development' in areas of medium or high risk of flooding, requiring site-specific flood risk assessment. 'Development' includes residential extensions and alterations and this is clarified in the reasoned justification.</p> <p>3. Within the policy text on basements the following criteria has been added: 'have clear internal access to upper floors' to address concerns.</p> <p>Additional text added to the policy reasoned justification to state that areas at medium or high risk of flooding must comply with Policy P4: Flooding, flood risk and groundwater protection zones.</p> <p>If an application was seeking a self-contained dwelling it would need to be considered under policy H6 conversions and sub-divisions.</p> <p>4. Comments noted.</p>

	<p>3. <u>Basement extensions</u> We welcome the inclusion of this policy and the need for basement extensions to ‘have no adverse impact on local ground water conditions, flooding or drainage issues’. However, there is no reference to the need for this to be demonstrated within a site specific flood risk assessment. This should be included. As per our FRSA for ‘vulnerable’ developments in Flood Zone 3, basement rooms/extensions must have clear internal access to an upper level (for example a staircase). Proposals which seek to create an independent, residential basement dwelling/flat in Flood Zone 3, should not be permitted. This should be made explicit.</p> <p>4. <u>Annexes</u> From a flood risk perspective we welcome the approach to annexes and agree that annexes at risk of flooding cannot be used as a self-contained dwelling</p>	
Historic England		
	<p>It is important to have clear guidance on what forms of alterations to residential buildings are appropriate, especially in sensitive locations such as conservation areas or to historic buildings with definite architectural character</p>	<p>Further policy guidance is given within LPSS policy D3: Historic environment and proposed policies in LPDMP D17 Listed buildings and D18 Conservation Areas. The Residential Extensions and Alterations SPD 2018 gives additional detailed guidance, and specifically mentions how special care and attention is required when extending or altering a listed building or building in a conservation area. Additional wording added to reasoned justification inserting reference to this.</p>
Surrey Nature Partnership		
	<p>Yes, in general support. Further explanatory [text] might be added to emphasise not compromising urban Green Infrastructure/BNG provision opportunities</p>	<p>Green infrastructure is addressed by Policy ID4 in LPSS and Biodiversity Net Gain is proposed to be addressed in policy (P7) within the LPDMP document.</p>
Other organisations		
Thames Water		

	<p>In relation to basement extensions, we support the requirement to have no adverse impact on local ground water conditions, flooding or drainage issues. Thames Water’s main concerns with regard to subterranean development are:</p> <p>1. The scale of urbanisation in certain areas can impact on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water’s sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network.</p> <p>2. Basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows. The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application.</p>	<p>1. Comments noted. Each planning application needs to be determined on its own merits rather than considered in a general context of urbanisation as a whole.</p> <p>Having policy criteria that states the development must have no adverse impact on local ground water conditions, flooding or drainage issues is considered to help address surface water discharge concerns.</p> <p>2. Text added to the reasoned justification of the policy relating to having pumped devices for basement developments that include a waste outlet.</p>
Burpham Community Association		
	<p>Yes, but...</p> <p>1) The relevant Neighbourhood Plan should be one of the applicable policy documents for all questions</p> <p>2) If the extension increases the likely occupancy then parking provision must be in accordance with the Neighbourhood Plan.</p>	<p>Neighbourhood Plans are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts, so replication in the LP is unnecessary. Parking standards are to be addressed in proposed policy ID11 in the LPDMP. An extension to a property is unlikely to engage the parking requirements proposed in ID11.</p>
Burpham Neighbourhood Forum		

<p>Page 18 2.15 Page 20</p>	<p>1. Basement extensions: This should be a 'certified or qualified structural engineers report' definition needs tightening. 2. Annexes: This policy needs to adequately address Parking requirements in all circumstances of new Annexes including Neighbourhood Plan requirements when they differ from the Borough.</p>	<p>1. Wording reviewed to include 'a structural impact report from a certified structural engineer'. 2. Parking standards are to be addressed in proposed policy ID11 in the LPDMP. An extension to a property is unlikely to engage the parking requirements proposed in ID11. Neighbourhood Plans are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts, so replication in the LP is unnecessary.</p>
<p>Compton Parish Council</p>		
	<p>Agree but would like to see the policy extended to ensure that extensions and alterations respect the surrounding landscape, especially in designated Areas of Great Landscape Value and Areas of Outstanding Natural Beauty (and the land forming their settings) and conservation areas.</p>	<p>Proposed policy D4: 'Achieving high quality design and respecting local distinctiveness' requires all new development to demonstrate a clear understanding of the place, its character, landscape and views. Policy D1: 'Place shaping' requires all new development to respond to the distinctive local character including landscape character. Areas of Great Landscape Value and Areas of Outstanding Natural Beauty and Conservation Areas have relevant policies elsewhere in the Local Plan (e.g Policy P1: Surrey Hills AONB and AGLV of the LPSS and proposed policy D18: Conservation Areas LPDMP).</p>
<p>Downsedge Residents Association</p>		

	<p>We do not agree with the preferred option.</p> <p>1.Meeting objectives 4 and 5 to retain distinct character, will not be possible if reference to respecting the height and materials of existing buildings in an area is not contained within the wording. Building heights within <u>existing residential areas</u> are a key component of character and must be considered highly relevant in planning applications as are building materials prevalent. <u>Reference to height and materials in existing buildings</u> (of domestic scale), <u>should be included in this policy.</u></p> <p>2.Clarification should be available as to what constitutes 'unacceptable impact' with respect sunlight, daylight and privacy. For instance minimum back to back separation distances with respect to privacy and overshadowing of garden amenity areas in terms of sunlight where garden size is limited.</p>	<p>1. Reference to height and materials in existing buildings are included in this policy in section (1). Height and materials are also addressed in LPDMP proposed policy D4: Achieving high quality design and local distinctiveness e.g high quality design including materials and detailing will be required in development proposals that take into account context and local character. With extensions and alterations it is more important that the extension or alteration respects the existing height and materials of the existing building, as neighbouring properties may be of a different scale or materials.</p> <p>2.'Unacceptable impact' would be assessed by the planning case officer for each application. Emerging LPDMP Policy D5 makes reference to privacy and amenity. The Residential Extensions and Alterations SPD 2018 gives additional detailed guidance, including on impact on daylight, sunlight and privacy and length of rear extension.</p>
East Clandon Parish Council		
	<p>1. We agree with Policy H5 with the below caveats: The shift towards more home working, less commuting & overcrowding on road and rail, better availability of high speed broadband and wellness and work-life balance has come into play. Consideration should be given to the need/desire for home conversions which would make homes more suitable for these lifestyle changes and could support a greener lifestyle through lower commuting. Eg office conversion from existing garage space.</p> <p>2.This should also include clear policy on addition of outbuildings/sheds/outdoor offices/gyms.</p> <p>3.Could the issue of proportionality of extension be better defined so that applicants and councillors have clearer guidance on this point?</p>	<p>1.Comments noted.</p> <p>2.Outbuildings are not considered as extensions or alterations to a house and are considered separately in planning policy terms. Existing LPSS Policy D1 and emerging policy D4 would apply to outbuildings.</p> <p>3.'Proportionality' is addressed in more detail in The Residential Extensions and Alterations SPD 2018 which provides further guidance, with examples given.</p>
East Horsley Parish Council		
	<p>1.We agree with one exception: In Paragraph 1(a) there is a reference to respecting the existing context, scale and character of the adjacent buildings and immediate surrounding area. However,</p>	<p>1.To consider a proposal, whilst the wider context is relevant it is the immediate surrounding area that is most pertinent. To just state 'surrounding area' is considered too broad and</p>

	<p>we believe the restriction to the 'immediate surrounding area' is too limiting. Around one third of the inhabitants of Guildford borough live in distinctive village settlements away from the main Guildford urban area. In such locations to limit an assessment of a development to its impact on the 'immediate surrounding area' may fail to appropriately reflect the wider general character of a particular village, which we believe should be a relevant contextual factor in any new development within that village. <i>SUGGESTIONS: Delete the word "immediate" from Paragraph 1(a) of Policy H5;</i></p> <p><i>2. Since parts of Guildford borough have adopted Neighbourhood Plans containing various Design Codes, which form part of their Local Development Plan, a reference to their applicability would also be appropriate within this policy.</i></p>	<p>unjustified, as it could include buildings in adjacent roads that are not relevant to the setting of the proposed extension/alteration. In design terms the immediate local context and street scene is most relevant.</p> <p>2.Neighbourhood Plans are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts, so replication in the Local Plan is unnecessary.</p>
Effingham Parish Council		
	<p>1. Agree, with the following amendments: Policy 1c should include the word appearance. Buildings can be consistent with the form, scale, character and proportion of the neighbouring areas but still have a different appearance to both the existing building and to neighbouring buildings.</p> <p>2. Please consider a separate Policy 4 roof or loft extensions. In particular they can cause light pollution. In rural dark sky areas there is particular concern about increasing light pollution and maintaining dark skies. Residential development should be designed to minimise light pollution, avoiding the use of unscreened roof-lights or atria.</p>	<p>1. The word appearance has been added to the policy.</p> <p>2. Roof and loft extensions are considered as an extension or alteration, so this policy applies to them. They are covered in detail within the Residential Extensions and Alterations SPD 2018. Comments on light pollution from roof lights and atria are acknowledged. It is worth noting that some roof lights do not require planning permission. Light pollution is proposed to be addressed in LPDMP policy D10a: 'Light impacts and dark skies' and policy D5 in terms of impact of artificial light on amenity.</p>
Holy Trinity Amenity Group		
	<p>1. It is unclear whether the existing and recently revised SPD is retained to provide detailed rules. If so, this needs to be stated.</p> <p>2. Degradation of area by excessive extending of properties. Almost all houses in our area have been extended. Large, or incremental, extensions have resulted in huge expansion of properties as much as doubling the original size of the property. This has resulted in major changes in character of the area, in contravention of the overriding policy that development must preserve the character of an established area. It has also</p>	<p>1. New reasoned justification wording inserted: 'Regard must also be had to the Guildford Borough Council Residential Extensions and Alterations SPD 2018 (or any document which replaces it) which gives additional detailed guidance.'</p> <p>2. Each application must be determined on its own merits, and each proposed extension or alteration determined on its merits at that time.</p>

	<p>reduced the stock of modest size family homes for which there is great need. Extensions do not make best use of materials or energy in the way a new design of the increased size would do. They always have some impact on neighbours, due to loss of light, overbearing nature, change of character, loss of value, extreme nuisance during construction. Neighbours receive no compensation, and often make similar extensions to maintain their status.</p> <p>3. Single storey rear extensions have become ubiquitous, partly due to the misguided central government relaxation of permitted development rules. They are often ugly and are frequently in the views of many neighbours, particularly when overlooked by properties higher up the Guildford hills. They usually do not make the best use of ground space and often lead to ungainly properties. In some of our roads the average house size has been increased by 40% or more by extensions.</p> <p>4. Pavement crossovers have been multiplied and front of house parking has mushroomed. This has caused a clear change of character to the roads.</p> <p>Options.</p> <ul style="list-style-type: none"> • Extensions must not increase the size (volume) of the house from that of the original by more than 40%. • Driveways and pavement crossovers must not be multiplied. • Permitted development rights will be removed for certain areas. • 5. No extensions to be allowed for 5 years after the purchase, including for new houses 	<p>3. Comments about permitted development rights noted, but outside the scope of this policy. In the most sensitive areas, such as conservation areas and AONB permitted development rights are more restricted. If a development is classed as permitted development local plan policies cannot be applied nor the permitted development resisted. Article 4 directions are the only mechanism to remove some of the permitted development rights, but they have to be clearly justified. Article 4 directions are applied separately to planning policy. They must be deemed necessary to protect the local amenity or the wellbeing of an area and clearly identify the potential harm (PPG Para: 038 Reference ID: 13-038-20190722)</p> <p>4. Comments about pavement crossovers noted, but outside the scope of this policy. Pavement crossovers would be addressed by the local highways authority.</p> <p>5. Extensions to newly built properties can be controlled by planning conditions, but the planning condition would need to be necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise; and reasonable in all other respects. To restrict future extensions for a specified time period would not be justified as either an extension is acceptable in planning terms or it is not.</p>
Guildford Residents Association		
	<p>We welcome the inclusion of this policy. We note that the Extensions and Alterations SPD 2018 is referenced. 1(b) raises the question of what would constitute 'unacceptable impact'. Are there minimum standards that can be referenced? We propose that 1(c) should include specific mention of materials</p>	<p>Unacceptable impact would be assessed on a case by case basis and vary according to the specific circumstances. No minimum standards are set to avoid inflexibility so a level of judgement is needed. Agree suggestion for 1 (c) and policy wording amended to include materials.</p>

Ockham Parish Council		
	Context and character of existing structure within its setting together with avoidance of 'development creep' and overdevelopment (excessive increase on original footprint) should continue to be considered when addressing housing extensions and alterations applications	Comments noted, and the policy wording will address this by reference to context, character, scale and proportions.
West Clandon		
	Will there be (is there) a separate SPD for extensions in the Green Belt? The new H5 policy adds little or nothing to what is already available in the 2018 SPD covering extensions. The word "calculate" in the LPSS implies quantification which is not available at the moment for Green Belt applications.	There are no current timescales for the preparation of the Green Belt SPD. The Residential Extensions and Alterations 2018 SPD's purpose is to give more detailed guidance than can be given within planning policies. The LPSS policy P2 reasoned justification refers to the Green Belt SPD and that "This will set out guidelines and considerations that the Council will take into account when assessing Green Belt planning applications." An assessment of what constitutes a disproportionate addition goes beyond mathematical calculations pertaining to volume and footprint. The matter also needs to be considered spatially, with reference to the massing, scale and general visual perception of the proposal.
Guildford Society		
	<p>1. The text should be amended to be: The report should show that there is no adverse impact to land and the structural stability of the application site and adjacent properties <u>during construction and once built</u>.</p> <p>2. The policy either needs extension or an appendix to provide more detail. Other authorities provide far greater guidance in a easily consumed format. There needs to be reference in the recent policy amendment to allow for extra floors to be added to flats, under permitted development rights. The LDMP needs to have clarity as how this is to be handled.</p>	<p>1. Agree, wording of policy reviewed to include during construction and once built.</p> <p>2. Permitted development rights frequently change, and some are temporary so reference within the LPDMP is not recommended, as it may quickly become outdated. If a development is classed as permitted development the Local Plan and its policies cannot be applied nor the permitted development resisted.</p>
Residents for Guildford and Villages / Guildford Green Belt Group		

<p>Para 2.15</p>	<ol style="list-style-type: none"> 1. There is key difference between housing extensions and alterations within the settlement boundary (where substantial permitted development rights exist) and those within villages washed over with green belt or houses outside of the settlement boundary. In order to be effective as a policy it should be split into separate parts to deal with the different locations / contexts of houses as identified. This was the case with the 2003 Local Plan which had separate policies for Extensions to Dwellings in the Urban Areas (Policy H8) and Extensions to Dwellings in the Countryside (policy H9) The preferred option for the policy is correct in requiring applications to respect the existing context, scale and character of the adjacent buildings and immediate surrounding area. 2. In many instances that existing context, scale and character has been well established within an existing or emerging Neighbourhood Plan (and accompanying evidence base). Reference should therefore be made to compliance with Neighbourhood Plans where they form a relevant part of the development plan. 3. Outside of these areas, a commitment is required from GBC to produce a detailed character study of the borough for the purposes of development management which will also assist in the determination of applications made for the extension and alteration of existing houses. 4. The issue of proportionality for extensions in the Green Belt, including villages washed over by the Green Belt, needs to be properly grasped. The Council has seen its interpretation of this overturned at Appeal (APP/Y3615/D/20/3245301 Pond Place, Woodhouse Lane, Holmbury St Mary) and a more clearly defined policy which enables residents to extend their homes sympathetically is required. 5. Other Councils (Mole Valley, and Waverley) use 31 December 1968 (when Surrey County Council first adopted a policy to control the scale of extensions to dwellings in the countryside) as the base point for the 'original building', rather than 1 July 1948. . 	<ol style="list-style-type: none"> 1. The main difference between the Local Plan 2003 Policies H8 Extensions to dwellings in urban areas & H9 Extensions to dwellings in the countryside were that policy H9 resisted the loss of small dwellings and outside the identified settlements and within the Green Belt there was a presumption against extensions to dwellings that resulted in a disproportionate addition taking into account the size of the original dwelling. Policy H9 has been superseded by LPSS planning policy P2: Green Belt and the NPPF para 145 which states the exceptions including part (c) extension or alteration of a building provided it does not result in disproportionate additions over and above the size of the original building. LPSS Policy P2 sets out the definition of original building. As the proposed policy includes wording that applications must respect the existing context, scale and character of the adjacent buildings and immediate surrounding area this addresses both urban and rural settings. 2. Neighbourhood Plans are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts, so replication in the LP is unnecessary. 3. The Residential Extensions SPD gives detailed guidance and will assist in the determination of applications made for the extension and alteration of existing houses. It provides advice on how to assess the impact on the scale and character on neighbouring houses and the street. In addition, although the Residential Design Guide was adopted a while ago the principles and advice remain valid and relevant today. It addresses 'character types' and gives detailed design advice on matters such as context, urban structure and grain. 4. Proportions are mentioned in the proposed wording: '...take into account the form, scale, height, character, materials and proportions of the existing building'. Green Belt matters are outside the scope of this policy.
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<p>6. Waverley is also seeking to introduce an upper limit on what is acceptable for residential extensions outside of settlement and have imposed a maximum 40% increase in floor space over that of the original building (based on its floor space on 31 December 1968). Adoption of this would ease many of the problems and concerns faced by residents in older houses who want to modernise and enable home working, or looking after an elderly relative. There should also be a recognition that genuine 'openness of the Green Belt' is not affected where an extension is being proposed for a residential home already in a village environment or generally hidden from view (see Appeal (APP/Y3615/D/20/3245301 above).</p> <p>7. The provision of basements to existing and proposed dwellings is another area where proportionality and openness of the green belt are cited as reasons for refusal. Yet common sense dictates that neither are genuinely affected by something that is underground and out of sight. Elmbridge council has recognised this, allowing basements, but with clear conditions and it is recommended that GBC does so as well. However further restrictions are necessary to prevent 'iceberg styles' houses which extend underground into neighbouring and public land. It is recommended that GBC follows a similar approach to Elmbridge in enabling the addition of basements in the green belt and other areas, without affecting proportionality or openness of the green belt, provided they are wholly subterranean, do not exceed the footprint of the existing building, are only served by discreet light wells and do not generate significant additional activity on the site as a whole.</p> <p>8. Due to recent permitted development rights allowing upwards extensions to existing residential buildings, consideration is required to the use of Article 4 Directions within the DMP to limit the use of these rights where they would be likely to cause a detrimental impact on the character of existing communities.</p> <p>9. Part 20 of the Town and Country Planning (Permitted Development and Miscellaneous Amendments) (England) (Coronavirus) Regulations 2020 (see Part 2 Section 22) will allow the construction of new developments on detached blocks of flats</p>	<p>5. Green Belt matters are outside the scope of this policy but for information the base date for original building of 1 July 1948 was used in the 2003 Local Plan (para 5.39) and 1948 is also the definition included in the NPPF glossary.</p> <p>6. The building footprint issue relates to Green Belt matters and is outside the scope of this policy.</p> <p>7. The policy as now drafted supports basements but includes the wording on them being proportionate. Green Belt issues are outside the scope of this policy, but may be addressed in a future Green Belt SPD.</p> <p>8. Concerns relating to permitted development legislation noted. If a development is classed as permitted development local plan policies cannot be applied nor the permitted development resisted. In the most sensitive areas, such as conservation areas and AONB, permitted development rights are more restricted.</p> <p>As identified, Article 4 directions are the only mechanism to remove some of the permitted development rights, but they have to be clearly justified. Article 4 directions are applied separately to planning policy. They must be deemed necessary to protect the local amenity or the wellbeing of an area and clearly identify the potential harm (PPG Para: 038 Reference ID: 13-038-20190722)</p> <p>9. Permitted development rights are outside the scope of this policy.</p> <p>10. Article 4 Directions are outside the scope of this policy.</p>
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	<p>under permitted development rights in certain circumstances. One such area for consideration by the local authority is consideration under part A.2 (1) of the regulations into the external appearance of the building (part e) and the impact on the amenity of the existing building and neighbouring premises including overlooking, privacy and the loss of light (part g).</p> <p>As matters stand, without the further tightening and definition of character and other matters within the DMP it is considered that there is substantial risk of developers using the permitted development rights to force the development of poorly considered and low-quality upwards extensions to existing residential buildings across the borough. Previous changes to permitted development rights, such as those under part O to allow the change of use from offices to residential, have resulted in substandard developments in Guildford and elsewhere. The roll out of further changes to the Permitted Development legislation and much more consideration is required by the council into the role that the DMP will play in guiding, and where necessary resisting, applications made using this mechanism.</p> <p>10. R4GV strongly recommends that the council undertakes a review of where article 4 directions could be implemented within sensitive areas of the borough in order to stop inappropriate development which has detrimental impact upon the existing community. This would enable any such conversions to be considered against the more detailed requirements of the DMP and for the impacts of any such development to be appropriately mitigated through the provision of necessary infrastructure.</p>	
West Horsley Parish Council		
	<p>A policy is needed but there are significant aspects missing that need to be included.</p> <p>1. There is an opportunity within this policy to tackle the increasing issue that is raised over proportionality. It is worth considering the approach other District and Borough Councils take, as GBC is often criticised over its rigid application of some policies. Given that each application is considered on its own merits there could be clearer definitions and more flexibility.</p>	<p>1. The policy as now drafted includes the wording on extensions and alterations taking into account the proportions of the existing building. Each application is determined on its own merits.</p> <p>2. Outbuildings are not considered as extensions or alterations to a house and are considered separately in</p>

	<p>2. A clear policy is needed on outbuildings/sheds/ outdoor offices/gyms etc especially as we will see increased working from home as a result of Covid-19.</p> <p>3. Roof Extensions need to be included in the same way that Basement extensions are addressed. There are many issues with applications where the owner wishes to convert the roof into a third floor as habitable accommodation, but this can fundamentally alter the street scene and character of the local area as it is introducing a third floor. Clear definition is needed here re what is/is not allowed.</p> <p>4. Reference is required to Neighbourhood Plans.</p> <p>5. Clear guidance on this is needed as Policy P2 is open to interpretation.</p>	<p>planning policy terms. Existing LPSS Policy D1 and emerging policy D4 would apply to outbuildings.</p> <p>3. Roof extensions would fall for consideration under part one of this proposed policy as they are an extension/alteration. More detailed guidance on roof extensions is provided in The Residential Extensions SPD.</p> <p>4. Neighbourhood Plans are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts, so replication in the LP is unnecessary.</p> <p>5. Green belt issues are outside the scope of this policy, however a future Green Belt SPD could provide clear guidance on the application of LPSS Policy P2: Green Belt.</p>
The Woodland Trust		
	<p>Policies on housing extensions and alternations should include a presumption in favour of the retention of existing trees, in line with policies P8 and D2. We therefore propose adding new wording 1 d) do not cause unacceptable harm or loss to mature trees. For example, we commend the wording used in the Rushmoor SPD on Home improvements and extensions (December 2019): <i>“Wherever possible, you should keep garden trees and landscaping features that make a positive contribution to the residential environment. They can also help screen or soften the visual impact of a new extension and help to integrate it with the surroundings. As well as providing a pleasant residential environment, trees and gardens contribute towards biodiversity and health and well-being.”</i></p> <p>We further request that where there is an unavoidable loss of trees on site, that an appropriate number of suitable replacement trees will be required to be planted. We recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees. Integrating trees and green spaces into</p>	<p>Comments noted. This issue will be addressed in part in LPDMP proposed policy P8: Protecting important habitats and species. This states development proposals for sites that contain significant trees, including ancient and veteran trees and ancient woodland, are expected to incorporate them and their root structures and understorey in undeveloped land within the public realm, and to provide green linkages between them. There is no need to repeat in this policy.</p>

	developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust <i>Residential developments and trees - the importance of trees and green spaces</i> (January 2019)	
Other respondents		
	Roof colour and design to match surrounding area	Materials are mentioned in Part (1) of the proposed policy. Design and materials are also addressed by other planning policies and would be considered by Planning Officers.
	Basement extensions should be prohibited or at least discouraged as they use a very large quantity of concrete which is a major contributor to CO2 emissions. This conflicts with Climate Change mitigation. Basement extensions produce a very large quantity of excavated material that has to be disposed of in some way. Large excavators and lorries will be required. The impact of the access route, the emissions of the vehicles and excavators, and the method of disposal should all be considered as part of the environmental implications. The method used to construct a basement can have a significant adverse impact on neighbours. E.g pile-driving next to occupied residences. Basement extensions normally require demolition of the existing building. This has a greater environmental impact than refurbishing an existing building, and demolition should only be permitted where the existing building is in a condemned state or the carbon cost payback period is less than ten years (which is unlikely).	Comments noted. The environmental impact of basement extensions is acknowledged. The Council cannot prevent people from applying for planning permission for basement extensions, but it can guide and establish planning policy to help determine such applications within the planning remit. The Council does have policies addressing climate change and mitigation (in particular policy D2), and a recently adopted SPD called 'Climate Change, Sustainable Design, Construction and Energy SPD' which will help when determining planning permissions. Further policies proposed in the LPDMP (Policies D12-14) will also address this issue further.
	The policy on annexes maybe too prescriptive. It is not unusual for annexes for elderly relatives to be self-contained and have their own kitchens and bathrooms. However, I fully understand the desire to close any loopholes which might allow opportunities for unscrupulous developers to subdivide properties.	Comments noted and acknowledged. The policy on annexes is considered to provide clear wording on what the Council's expectations are.
	Would wish to see minimum standards referenced.	Minimum space standards are referenced in LPSS policy H1.

	<p>I do not agree with it clearly and unequivocally shares either bathroom or kitchen facilities with the main dwelling house, and it cannot be used as a self-contained dwelling. I can think of many cases where an elderly relative needs support close by but still wants to retain some measure of independence.</p>	<p>Without these safeguards a separate dwelling would be created, which would require a different application for a new dwelling house.</p>
	<p>Conversion into an HMO may be appropriate in the town or suburban settings but in a village, inset or not the character and extent of an extension or alteration has a wider impact. This can be addressed by an overall roof height and density control plus particular regard to parking arrangements.</p>	<p>Roof height, density and parking are matters addressed by other policies in the Local Plan.</p>

DRAFT

Policy H6 Housing conversions and sub-division		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Environment Agency		
2.21	<p>1. No. We understand Guildford, particularly the Town Centre, has numerous areas at risk of flooding. We note paragraph 2.21 does not state that housing conversions and sub-divisions will be covered by Policy P4: Flooding, flood risk and groundwater protection zones. Whilst Policy P4: Flooding, flood risk and groundwater protection zones does cover all development in areas at medium or high risk of flooding, in order to strengthen Policy H6 we recommend the following is included. This will help to ensure that flood risk is not increased within the borough, as per paragraph 163 of the NPPF.</p> <p>2. <i>Flood risk assessments (FRA)</i> In accordance with paragraph 163 of NPPF a site-specific flood risk assessment (FRA) should be provided for all development in Flood Zones 3 and 2. This includes change of use proposal such as offices to houses and the sub-division of an existing house to create additional dwellings. Intensification in use i.e. the sub-division of a house into flats in the ‘developed’ Flood Zone 3b should not be permitted and this should be made explicit in Policy H6.</p> <p>3. <i>Change of use</i> In accordance with the Flood Zone and flood risk tables 1, 2 and 3 of the Planning Practice Guidance (PPG), change of use proposals may involve an increase in flood risk if the vulnerability classification of the development is changed. Policy H6 should address this issue, to ensure vulnerable developments are not at increased risk of flooding.</p> <p>4. <i>Evacuation/safe access and egress.</i> In accordance with paragraph 40 of the Planning Practice Guidance, proposals that are likely to increase the number of people living or working in areas of flood risk require particularly careful consideration, as they could increase the scale of any evacuation required.</p>	<p>1, 2 & 3. LPSS policy P4: Flooding, flood risk and groundwater protection zones covers development proposals. Any proposals will need to be assessed in accordance with the development plan. The plan must be read as a whole - it is unnecessary to cross reference policies.</p> <p>2. Subdivision in flood area 3b is addressed by LPDD Policy P4 where specific criteria apply to development in flood zone 3b.</p> <p>2 & 4. Policy P4 addresses safe access and egress, so there is no need to repeat this. Additional text has been added into the reasoned justification reiterating NPPF and Policy P4’s requirement that in areas of medium to high risk of flooding/flood zones 2 & 3 a site specific flood risk assessment will be required, which includes the consideration of access and egress.</p>
Historic England		

	It is important to have clear guidance on what forms of alterations to residential buildings are appropriate, especially in sensitive locations such as conservation areas or to historic buildings with definite architectural character.	Further policy guidance is given within LPSS policy D3: Historic Environment and proposed policies in LPDMP D17 Listed buildings and D18 Conservation Areas. The Residential Extensions and Alterations SPD 2018 gives additional detailed guidance, and specifically mentions how special care and attention is required when extending or altering a listed building or building in a conservation area. A reference has been included in the policy reasoned justification.
Other organisations		
Burpham Community Association		
	<p>We agree with the preferred option but...</p> <p>1) The relevant Neighbourhood Plan should be one of the applicable policy documents for all questions</p> <p>2) If the conversion or sub- division increases the likely occupancy then parking provision must be in accordance with the Neighbourhood Plan.</p>	<p>1. Neighbourhood Plans are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the Neighbourhood Plan and Local Plan is to be dealt with. Replication in the Local Plan would not appear to be necessary. Explanatory text will be in the introduction to the LPDMP.</p> <p>2. Parking is addressed in greater detail in LPDMP policy ID11. The Council has added new policy criteria stating that 'sufficient amenity space, parking, bin storage and cycle parking is available'.</p>
Burpham Neighbourhood Forum		
Page 23	We also suggest the addition of a criterion 'd' relating to parking requirements including those set out in Neighbourhood Plans.	Parking is addressed in greater detail in LPDMP policy ID11. Parking Standards criteria within Neighbourhood Plans must also be taken into account. The Council has added new policy

		criteria stating that 'sufficient amenity space, parking, bin storage and cycle parking is available'.
Cranley Road Area Residents Association		
	The scope of this policy should be expanded to include infill development.	Infill development is addressed in greater detail in policy D9: Residential Infill Development.
East Clandon Parish Council		
	<p>We agree with the aims and requirements of Policy H6 as proposed in the Preferred Option with the below caveats:</p> <ol style="list-style-type: none"> 1. reference to 'immediate locality' should be revised; it may fail to appropriately reflect the wider general character of the village, which we believe is a relevant contextual factor. 2. the historic and heritage aspects of some of our more characterful and important buildings are best preserved by maintaining their status as single dwellings. Where homes are sub-divided it is important that the local character is respected in the design and finished appearance. 3. with flat conversions the issue of local parking, and in particular the impacts for on-street parking in the vicinity, are often critical factors in assessing such projects. Whilst Parking Standards are also addressed by Policy ID11, because of its particular significance to flat conversions we suggest including a specific reference to parking within Policy H6. 	<ol style="list-style-type: none"> 1. The Council has defined 'immediate locality' in the context of this policy. 2. Alongside specific proposed local plan policies, the Residential Extensions and Alterations SPD 2018 gives additional detailed guidance, and specifically mentions how special care and attention is required when extending or altering a listed building or building in a conservation area. 3. Parking is addressed in greater detail in LPDMP policy ID11. The Council has added new policy criteria stating that 'sufficient amenity space, parking, bin storage and cycle parking is available'.
East Horsley Parish Council		
1 (a)	<p>We agree with the aims and requirements of Policy H6 as proposed in the Preferred Option with one exception:</p> <ol style="list-style-type: none"> 1. In Paragraph 1(a) reference to 'immediate locality' should be revised. In village locations to limit an assessment of a development to its impact on the 'immediate locality' may fail to appropriately reflect the wider general character of a particular village, which we believe is a relevant contextual factor. With flat conversions the issue of local parking, and impact for on-street parking in the vicinity, are critical factors. Whilst Parking Standards are addressed by Policy ID11, we suggest including a specific reference to parking within Policy H6. 	<ol style="list-style-type: none"> 1. The Council has defined 'immediate locality' in the context of this policy. 2. Parking is addressed in greater detail in LPDMP policy ID11. It is considered best not to include additional parking information within this policy as this may cause confusion between policies and make the plan more complicated to navigate. The Council has added new policy criteria stating that 'sufficient amenity space,

	<p>SUGGESTIONS</p> <p>a) Delete the word “immediate” from Paragraph 1(a) of Policy H6;</p> <p>b) Add an extra criterion addressing the sufficiency of off-road parking provisions;</p> <p>c) Since parts of Guildford borough have adopted Neighbourhood Plans containing various Design Codes, which form part of their Local Development Plan, reference to their applicability would also be appropriate within this policy;</p>	<p>parking, bin storage and cycle parking is available’.</p> <p>3.Neighbourhood Plans are adopted in their own right and are part of the Development Plan, so replication in the Local Plan would not appear to be necessary.</p>
Effingham Parish Council		
	<p>Agree. However, the policy needs to include a subsidiary policy on parking. Where a building is split into several apartments or bedsits there should be guidance or a subsidiary policy to control and manage parking overspill on to pavements, public roads and the local area.</p>	<p>Parking is addressed in greater detail in LPDMP policy ID11. The Council has added new policy criteria stating that ‘sufficient amenity space, parking, bin storage and cycle parking is available’.</p>
Guildford Residents Association		
	<p>1.We welcome the inclusion of this policy. We wish to see the addition of reference to the application of minimum space standards.</p> <p>2.There should be adequate provision for storage, e.g. bicycles, parking, and we urge the adoption of minimum external amenity standards.</p>	<p>1. LPSS policy H1: Homes for all includes criteria (3) that all new residential development must conform to national space standards. This includes conversions. Additional wording added to the reasoned justification to re-iterate this.</p> <p>2.The Council has added new policy criteria stating that ‘sufficient amenity space, parking, bin storage and cycle parking is available’.</p> <p>The Council has defined ‘amenity space’ in the context of this policy. This issue is explored further in LPDMP policy D5 on amenity.</p>
Holy Trinity Amenity Group		

	<p>1. A significant number of large Victorian houses have been converted into flats. Often, they are not adequately maintained and this degrades the area and is a nuisance to neighbours. It would be helpful if a planning condition was applied to ensure proper maintenance arrangement. A management plan for care of the building to be submitted to Council for approval.</p> <p>2. Favourable consideration will be given for sub-division of all large houses, irrespective of age.</p> <p>3. The policy for HMOs must be defined somewhere, preferably separately.</p> <p>4. Amenity space must include some outdoor space, preferably individual, but if this is impossible then arrangements must include shared outdoor space.</p>	<p>1.Planning policy does not cover management plans or maintenance arrangements.</p> <p>2.The proposed policy is worded to say sub-division is 'required to ensure' meeting certain criteria. This applies to all houses where planning permission is needed for the works.</p> <p>3.LPSS policy H1 section (8) covers HMO's.</p> <p>4. The Council has added a definition of 'amenity space' in the context of this policy. This issue is explored further in LPDMP policy D5 on amenity.</p>
Merrow Residents Association		
	<p>We agree with the preferred option. We suggest the addition of reference to the application of minimum space standards. There should be adequate provision for storage, e.g. bicycles, and we urge the adoption of minimum external amenity standards.</p>	<p>LPSS policy H1: Homes for all includes criteria (3) that all new residential development must conform to national space standards. This includes conversions. Additional wording added to the reasoned justification to re-iterate this. The Council has added policy criteria stating that "sufficient amenity space, parking, bin storage and cycle parking is available".</p>
West Clandon		
	<p>The preamble aspires to high quality of design etc and yet this is not mentioned in the policy. There is reference in the preamble to Policy H1(8) in the LPSS which is also silent on design.</p>	<p>Design is covered in detail in LPSS policies D1-D3 and LPDMP policy D4. When dealing with conversions and subdivisions these tend to be internal alterations where design is less impacted upon.</p>
Worplesdon Parish Council		
	<p>Need for sufficient parking, or in certain areas in the Town Centre or by rail stations, car free.</p>	<p>Parking is addressed in greater detail in LPDMP policy ID11. The Council has added new policy criteria stating that "sufficient amenity space,</p>

		parking, bin storage and cycle parking is available’.
Shalford Parish Council		
	What is the definition of " amenity facilities" in this context? Does it relate to facilities associated with individual properties e.g gardens, parking spaces, and /or local amenities such as transport links, parking,open space, play areas and sports facilities, local shops?	Amenity space has been added to the policy definitions section and explains that its outside space associated with a home, and can be private or shared. Amenity space in this context relates to the facilities associated with the individual property.
Guildford Society		
	<p>1. Useful new policy that needs enhancing by adding: Transport e.g. parking is considered</p> <p>2. Sub-divided accommodation should comply with the Space Standards as laid out in Policy H1 in the LPSS.</p> <p>3. There may be an issue related to Permitted Development rights, but we are aware other local authorities have created policies to manage these effectively; as one authority has a policy that states:</p> <p><i>The SHMA identified a need for larger accommodation, however there has been a loss of family housing and larger housing units through conversions. Policy DMH2 Conversions states that the conversion of dwellings with less than 150sqm of existing habitable floorspace will only be permitted where the property is unsuitable for families. In addition, conversions of dwellings of 150 sq ms or more of existing habitable floorspace will only be permitted where: a.) at least one family-sized unit is provided with access to a dedicated rear garden; or b.) where four or more units are being provided, at least two are family-sized unit (one of which must have access to a dedicated rear garden); and c.) the provision of 1 bedroom/studio accommodation is limited to one unit, or 1 in 5 units in larger conversions;</i></p>	<p>1. Parking is addressed in greater detail in LPDMP policy ID11. The Council has added a new policy criteria stating that ‘sufficient amenity space, parking, bin storage and cycle parking is available’.</p> <p>2. LPSS policy H1: Homes for all includes criteria (3) that all new residential development must conform to national space standards. This includes conversions. Wording is included in the reasoned justification to re-iterate this.</p> <p>3. Permitted development is outside the scope of this policy. If a development is classed as permitted development local plan policies cannot be applied nor the permitted development resisted. To have a similar policy would need an evidence base justification. Our SHMA showed the need for smaller 1,2 and 3 bedroomed properties so the proposed alternative policy would be contrary to that. The SHMA also highlights that the housing options for young people may be more limited (page 162).</p>
Residents for Guildford and Villages / Guildford Green Belt Group		

<p>1. R4GV does not agree. A significant issue for Guildford Town Centre is the proliferation of Houses of Multiple Occupancy (HMOs), mainly for use as student accommodation. The context is set out within part 8 of Policy H1 Homes for All. However, this is a generic approach and the policy is ineffective at resisting growth of new HMOs across the town which has the potential to cause detrimental impact to the existing community. It therefore requires further definition within an additional and expanded policy H6 which will set out the approach to HMOs.</p> <p>2. The issues created by HMOs have been well recognised in other university towns e.g Leamington Spa which has suffered from a significant rise in HMOs. Warwick District Council is bringing forward a Purpose Built Student Accommodation SPD1 which will guide the development of appropriate student accommodation in suitable locations whilst also restricting the growth of additional HMOs within the district.</p> <p>3. An example of best practice is the approach of Oxford City Council to the licencing of HMO2; a significant system of clear standards, licencing, review and enforcement has been developed and is an effective way of controlling HMOs. This is in stark contrast to the approach to this area by GBC which is lacking in the robust approach in policy, licencing and enforcement adopted by other councils.</p> <p>1 https://www.warwickdc.gov.uk/download/pbsa_consultation_draft.pdf</p> <p>2 https://www.oxford.gov.uk/info/20113/houses_in_multiple_occupation</p> <p>In order for policy H6 to be effective, the council must also bring forward additional policy and/or guidance around HMOs.</p> <p>4. Consideration must also be given to the use of article 4 directions to restrict the conversion of existing family housing stock within the borough into HMOs in order to limit the impact upon the existing community that this form of development has.</p> <p>5. For development falling out of HMOs and Student accommodation it is recommended that the council is clear that applications brought forward under policy H6 will also be expected to comply with other policies within the DMP including amenity space, affordable housing and parking standards.</p>	<p>1. Whilst criteria in policy H6 must be compatible with the criteria of policy H1, the Council has added new policy criteria (d) which will supplement H1 (8) by stating that ‘sufficient amenity space, parking, bin storage and cycle parking is available’.</p> <p>2. Purpose built student accommodation is addressed by policy H1 (6). If further guidance was needed this could be considered through an SPD, but most of the sites for PBSA may have already come forward. Growth of HMO’s can be considered through planning applications where required.</p> <p>3. Standards, licencing¹, review and enforcement are outside the scope of this policy.</p> <p>4. Article 4 directions are applied separately to planning policy. They must be deemed necessary to protect the local amenity or the wellbeing of an area and clearly identify the potential harm (PPG Para: 038 Reference ID: 13-038-20190722) Currently small scale HMO’s of less than 6 people are classed as permitted development.</p> <p>5. The plan will be read and considered as a whole, so it is not considered necessary to list other policies that may be relevant.</p>
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¹ For information, the Council do run a licencing system for HMO’s. <https://www.guildford.gov.uk/hmo> The Council also have [Guildford Lettings Accreditation Scheme](#) . Enforcement action is taken in accordance with our [Enforcement Policy \[202.5KB\]](#) . Information: <https://www.guildford.gov.uk/privaterenting>

Other respondents		
	<p>Tight restrictions and guidance on HMOs should be in place. These multiple occupancy units are often poorly constructed/converted affording very little privacy of quality of living. They are usually a preferred way of landlords optimising profits and as such should be very carefully monitored.</p>	<p>Adopted LPSS Policy H1 Homes for all addresses HMO's in part 8. Whilst outside the scope of this policy, the Council licenses HMO's and has set internal amenity standards. It also has the Guildford Lettings Accreditation Scheme to help raise standards and promote good landlords, plus an enforcement policy to take action where necessary.</p>
	<p>Further detail is required as to what is considered "sufficient amenity space" and how this would be enforced. This may be particularly important in regard to student housing.</p>	<p>Amenity space added to the policy definitions section and explains that its outside space associated with a home, and can be private or shared. This issue is explored further in LPDMP policy D5 amenity.</p>
	<p>The policy could also be strengthened by applying an Article 4 direction to the Borough (which removes permitted development rights for HMO's sub-division of dwellings). This would mean all sub-divisions require planning permission and be subject to the development management approach of this policy, ensuring much greater protection of amenity for existing residents who may otherwise be adversely affected when there are no checks/balances via permitted development.</p>	<p>Article 4 directions are applied separately to planning policy. They must be deemed necessary to protect the local amenity or the wellbeing of an area and clearly identify the potential harm (PPG Para: 038 Reference ID: 13-038-20190722)</p>
	<p>1. The usual problem with the subdivision of dwellings to provide bedsits and flats is the lack of parking, adequate space for bins and bicycles. Rather like imposing minimum parking standards, the council should insist on minimum space requirements for the off street storage of waste bins and bicycles. Personally I would also prefer to see minimum space standards for bedsits and flats rather like the Parker Morris standards in the 1970's.</p> <p>2. Conversion of office accommodation into habitable accommodation is currently deemed permitted development and therefore can be undertaken without any reasonable control often leading to substandard accommodation; conversion of office accommodation into habitable accommodation should require full planning permission.</p>	<p>1. The Council has added a new policy criteria stating that 'sufficient amenity space, parking, bin storage and cycle parking is available' LPSS policy H1 Homes for all includes criteria (3) that all new residential development must conform to national space standards. This includes conversions.</p> <p>2. Permitted development is outside the scope of policy. If a development is classed as permitted development local plan policies cannot be applied nor the permitted development resisted.</p>

DRAFT

Policy E10: Rural development (including agricultural diversification)		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		
	Agree.	Support for preferred option noted.
Surrey Nature Partnership		
	Supported. Regarding the list of approved uses, reference could be made specifically to 'eco-tourism', ie. as environmental educational/interpretational facilities (with additional Glossary entries as necessary).	The list of uses supported in principle were only examples, therefore it was not possible to list everything that could be suitable. Eco-tourism was considered adequately covered under the existing reference to tourism facilities.
Other organisations		
Burpham Community Association		
	Non-agricultural businesses which are not related to or operated with the farm's agricultural operations may still be economically desirable and not detrimental to the countryside. For example, the brewery at Old Scotland Farm and various possible craft, exercise or entertainment activities could be appropriate.	The preferred option supports agricultural diversification to non-agricultural uses in principal. These may be unrelated uses, as in the case of activity centres and arts and craft shops which are included as examples in Countryside point (2). Where there is a change of use from an agricultural use, it would have been up to the landowner or developer to demonstrate that there is a need for diversification to enable continued viable operation of the farm business.
Compton Parish Council		
	Compton PC suggests that the wording of this policy be amended so that only small-scale sports buildings (sports pavilion or clubhouse) can be built in the green belt.	The preferred option wording referred to " <i>New appropriate facilities for small-scale outdoor sport or outdoor recreation, such as a sports pavilion or clubhouse</i> ". This would have ensured that any proposed buildings for outdoor recreation are ancillary to the use. It had been intended to reword the policy so that it sought for rural development to be of a scale that is proportionate to its setting, thereby allowing

		<p>account to be taken of site circumstances; however we have not made this change as the policy has now been removed from the document. We consider that its provisions are adequately addressed in the NPPF (in particular paragraph 145-146 in relation to Green Belt) and in other adopted and emerging Local Plan policies.</p>
	<p>Adequate parking is often an afterthought. Such business may later seek to improve income by diversifying, and residents and Parish Councils have ongoing, unwanted parking issues as a result. These would be better addressed at planning stage.</p>	<p>Agreed – this matter was covered in the preferred approach wording under the paragraph headed ‘Non-agricultural uses within farm holdings’.</p>
	<p>We would also like to see the policy amended so that flood-lighting is not permitted in the green belt or in areas that impact the countryside, especially the AGLV and AONB. Dark skies are an important characteristic of the AONB, and flood-lighting can impact on wildlife and important ecosystems as well as causing a nuisance to local residents.</p>	<p>It is not possible to control external lighting in all cases through policies. However, we consider that the issue is adequately covered. The Biodiversity in New Developments policy P6 addresses lighting impacts on sensitive wildlife habitats, whilst policy D10a: Light Impacts and Dark Skies deals with light pollution’s impacts on privacy and amenity as well as biodiversity.</p> <p>Policy E10 has therefore now been removed from the document, as we consider that its provisions are adequately addressed in the NPPF (in particular paragraph 145-146 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.</p>
	<p>The NPPF permits limited ‘infill’. However, there doesn’t appear to be any definition of ‘limited’ and rural ‘infill’ is often on streets, not designed for the type of traffic we have today.</p>	<p>It is not an economic policy’s role to seek to restrain housing growth; although in regard to the appropriateness of a potential separate new policy the NPPF states that limited infilling is appropriate within villages in the green belt – therefore a local authority cannot use local plan policies to prevent this altogether. Such a policy may also conflict with national policy if it limits the borough’s ability to meet its housing and other needs (para 11 of NPPF). The approach in the LPSS in para 4.3.24 to development in the Green Belt means applying existing Local Plan policies on a case by case basis; we consider this more flexible than producing a Development Management policy covering this issue that would apply rigidly to every site.</p>
<p>Cranley Road Residents’ Association</p>		

Policy E10	<p>Proposed policy in Green Belt 1) New appropriate facilities... is far too open ended and should specify where siting and scale would minimise impact on openness and rural character to an acceptable extent. Cumulative impact of such development should also be considered.</p> <p>This policy should include reference to temporary/mobile development, such as caravans, not being considered as grounds for permitting permanent development on an open site.</p>	<p>It is generally up to case officers to determine whether a facility is appropriate on a case by case basis, taking account of the nature of the site, which is likely to vary in each case. It would go beyond the constraints of NPPF paragraph 145 (b), and be likely to be considered unreasonably restrictive by a planning inspector for the policy to consider cumulative impact of proposals for outdoor sport and outdoor recreation, as it would limit many opportunities for suitable forms development that would not harm the openness of the Green Belt in accordance with this paragraph.</p>
Effingham Parish Council		
	<p>Agree, but would like to see a reference in the rural development policies to possible dark skies guidelines to prevent over illumination of a rural area due to roof lighting in dark skies areas.</p>	<p>It is not possible to control external lighting in all cases through policies. However, we consider that the issue is adequately covered. The Biodiversity in New Developments policy P6 addresses lighting impacts on sensitive wildlife habitats, whilst policy D10a: Light Impacts and Dark Skies deals with light pollution's impacts on privacy and amenity as well as biodiversity.</p> <p>Policy E10 has therefore now been removed from the document, as we consider that its provisions are adequately addressed in the NPPF (in particular paragraph 145-146 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.</p>
	<p>A clause needs to be inserted that would ensure buildings erected under this policy cannot be converted to residences under NPPF 146 (which allows reuse of buildings in green belt if they are of permanent and substantial nature, but doesn't specifically require they are no longer needed</p>	<p>This would conflict with paragraph 146 of the NPPF and the presumption in favour of sustainable development under NPPF paragraph 11.</p>
Guildford Residents' Association		
	<p>We agree with the need to include a policy dealing with rural development. The problem with the text of E10 is the degree of conditionality – as in 'the policy might support...' and 'the policy could support...'. The policy should be more specific about the criteria.</p>	<p>The wording of the Regulation 18 preferred option was necessarily conditional and not definitive as it was dependent on it being taken forward as a draft policy beyond that stage.</p>
Policy – Countryside	<p>Please add 'light pollution' to noise in the paragraph starting 'New buildings in the countryside..' under the Countryside heading.</p>	<p>It is not possible to control external lighting in all cases through policies. However, we consider that the issue is adequately covered. The Biodiversity in New Developments policy P6 addresses lighting</p>

(second paragraph)		<p>impacts on sensitive wildlife habitats, whilst policy D10a: Light Impacts and Dark Skies deals with light pollution's impacts on privacy and amenity as well as biodiversity.</p> <p>Policy E10 has therefore now been removed from the document, as we consider that its provisions are adequately addressed in the NPPF (in particular paragraph 145-146 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.</p>
Guildford Society		
	<p>Policy E10 cross refers to P2, P3 and E5. It extends considerably the permitted forms of development in RE8 but see also 2003 Plan Policy RE2 on development within the Green Belt, and RE9, which did permit wider re-use or adaption of existing buildings.</p>	<p>RE9 design criteria are covered under LPSS Policy D1.</p>
	<p>The Policy needs to comment on transport e.g. even small-scale business enterprises can generate traffic volumes in narrow roads.</p>	<p>Transport and highways issues are covered elsewhere e.g. in Policy ID3 of the LPSS.</p>
	<p>It is not clear that the Green Belt proposed forms (1) and (2) are compatible with the restrictions of the 'Non-agricultural uses within farm holdings', e.g. that outdoor sports would support the farm's agricultural operation.</p>	<p>This comment is a misinterpretation of point (1) of the preferred approach. If an outdoor sports facility were proposed as a stand-alone development and not by means of conversion of an agricultural building, then it would have been viewed as suitable in principle under point (1).</p> <p>However if the Council were to receive an application to convert an agricultural use to any use that does not support the farm's agricultural operation (which may well be the case for an outdoor sports facility) then it would not be compliant with the last paragraph, i.e. that the use will be required to be operated as part of the farm holding and support the farm's agricultural operation. Small-scale business uses such as farm shops can help to support a farm's agricultural operation, and certain outdoor recreational uses could do as well, for example the animal petting facility referred to in the second part of point (1).</p>
Holy Trinity Amenity Group		

Policy: Green Belt	Options: Permanent floodlighting for outdoor evening / night activities in the Green Belt will not be allowed.	It is not possible to control external lighting in all cases through policies. However, we consider that the issue is adequately covered. The Biodiversity in New Developments policy P6 addresses lighting impacts on sensitive wildlife habitats, whilst policy D10a: Light Impacts and Dark Skies deals with light pollution's impacts on privacy and amenity as well as biodiversity. Policy E10 has therefore now been removed from the document, as we consider that its provisions are adequately addressed in the NPPF (in particular paragraph 145-146 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.
Merrow Residents' Association		
	The term 'small scale' needs to be defined. For instance, is a single football pitch 'small scale'? We suggest that the answer is yes, but we would not support this provision being extended to cover a new 18-hole golf course in the Green Belt. The same general concerns apply to the section on the countryside so far as the definition of 'small scale' is concerned.	Points on retained policies R6 and R8 covered by new LPDMP policy on sports and recreational facilities.
	We are puzzled why reference is made to a sports pavilion or clubhouse, whilst such a development would of necessity be associated with a playing field or golf course. This needs to be clarified.	The wording of paragraph (1) refers to 'appropriate' facilities. If a sports pavilion were proposed in the Green Belt, then it could be supported in principle only because it falls into exception b) under paragraph 145 of the NPPF (and provided it preserves the openness of the Green Belt). It was explained in the supporting text (paragraphs 3.11-3.12) that the policy lists examples of development that fit into these exceptions and could therefore be supported.
	We suggest that in the "Preferred option for rural development" box under the heading Countryside the words 'or light pollution' could be added within the brackets at the end of the sentence: "...any built features should avoid harm to the local environment or residential amenity (particularly through noise or light pollution)."	It is not possible to control external lighting in all cases through policies. However, we consider that the issue is adequately covered. The Biodiversity in New Developments policy P6 addresses lighting impacts on sensitive wildlife habitats, whilst policy D10a: Light Impacts and Dark Skies deals with light pollution's impacts on privacy and amenity as well as biodiversity. Policy D10: Noise Impacts deals separately with the impact of noise on sensitive receptors, including residents and the natural environment. Policy E10 has therefore now been removed from the document, as we consider that its provisions are adequately addressed in the

		NPPF (in particular paragraph 145-146 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.
	It should be clear in the policy that the landowner cannot separate the buildings [on a farm that are new or proposed for change of use] into a separate operation leading to more development. This shouldn't become a route to development of a financially unviable farm.	This was adequately covered by the existing wording which states that proposals for non-agricultural uses should support the farm's agricultural operation.
National Trust		
	The Trust would like to suggest that the examples given in the Green Belt section are removed as there are a number of Trust sites where buildings have been permitted to support outdoor recreation, but these are neither sports pavilions or clubhouses. The Trust would suggest that it is better to guide applicants on their specific proposals, rather than provided a restrictive policy.	The examples given in the policy were not a definitive list of outdoor sport and recreational facilities and therefore would not have prevented other types of development being considered appropriate in the Green Belt.
	It is not clear what would be defined as "small-scale" and how this would be measured, ie: floor area, visitor levels, area of new building required. The Trust would request that this is clarified or removed to ensure that emerging policies is clear on the level of development which may be permitted in rural areas.	It was previously intended to change this wording to state that rural development should be of a scale that is proportionate to its setting, rather than that it must be small-scale. This would have avoided confusion for applicants over the definition of small-scale and allowed for interpretation by planning officers on a case by case basis taking account of site circumstances. Policy E10 has now been removed from the document, as we consider that its provisions are adequately addressed in the NPPF (in particular paragraph 145-146 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.
	The Trust would also suggest that reference needs to be made to protected landscapes and heritage assets (and their setting) when considering the appropriateness of new development in the countryside.	A separate LPDMP policy covers protection for designated heritage assets and their setting from new developments; this deals with urban as well as rural areas, therefore there was no need to include similar criteria in Policy E10. Heritage assets include protected landscapes.
Ockham Parish Council		

	<p>We support the principle of encouraging a diverse economy through creation of new rural business or support of existing ones but urge caution on any relaxation of planning regulations to ensure that the openness of the green belt is maintained and that there is no detriment to the countryside as it currently exists, even in non-Green Belt areas.</p>	<p>Noted.</p>
<p>Residents for Guildford and Villages / Guildford Green Belt Group</p>		
	<p>One of the biggest areas of planning contention in GBC is limited infilling in villages. One of the significant issues is the lack of any definition for limited infilling within the NPPF or guidance. The Part 1 Local Plan sets out a definition of 'limited infilling' in paragraph 4.3.23 of the supporting text in relation to policy P2: Green Belt.</p> <p>One of the reasons for the increase in this type of application is the tight nature of what is permissible in terms of extensions to existing properties in the green belt, as noted by our representations to policy H6. Policy E10 does not allow for these impacts [of infilling and extensions to buildings] to be controlled, or where necessary mitigated. It is also not considered that this approach to windfall sites is sustainable, in line with the thrust of the wider policies of the development plan, or often Neighbourhood Plans advocating smaller and more affordable homes.</p> <p>It is considered that the DMP must set out the approach to limited infilling in far more detail. It is recommended that limited infilling is set out within a separate policy to allow clarity on this matter, rather than forming part of a far wider policy.</p> <p>As part of the wording of this policy it is suggested that GBC seeks to provide further weight to the following:</p> <ul style="list-style-type: none"> • To limit the size and number of properties which can be built through infilling. • To ensure that any infilling is reflective of the prevailing character and density of the surrounding area. • For limited infilling projects to be in compliance with policies of the neighbourhood plan policies. 	<p>It is not an economic policy's role to seek to restrain housing growth, although in regard to the appropriateness of a potential separate new policy the NPPF states that limited infilling is appropriate within villages in the green belt – therefore a local authority cannot use local plan policies to prevent this altogether. Such a policy may also conflict with national policy if it limits the borough's ability to meet its housing and other needs (para 11 of NPPF). The approach in the LPSS in para 4.3.24 means applying existing LP policies on a case by case basis, not necessarily producing a new DM policy that would apply rigidly to every site.</p> <p>The Epsom and Ewell Development Management Policies DPD policy DM2 deals only with infilling within major developed sites. This refers to E&E policy in their Core Strategy 2015 'Policy DM2: Infilling within the boundaries of Major Developed Sites' this policy was adopted in the context of PPG2. It is no longer relevant as the NPPF now enables redevelopment of PDL within the Green Belt. Infilling is an appropriate use in these areas so one cannot use the impact of openness to assess its suitability. The Waverley Local Plan Part 2: Site Allocations and Development Management Policies Policy DM10 states simply that development within the settlement boundaries, which includes infilling, will be permitted subject to other policies in the Development Plan.</p>

	<ul style="list-style-type: none"> • For consideration to be provided on the cumulative impact of sequential 'limited infilling' developments on the existing community. 	
Sport England		
	<p>Sport England does not support inclusion of the words "small scale" in relation to new outdoor sports and recreation facilities within the green belt as it is not consistent with NPPF paragraph 145. Further to this there is no definition as to what is meant by small scale this may result in the policy not being applied consistently or prevent much needed facilities being provided. To guide appropriate development the policy's supporting text could highlight support for appropriately sized developments which would help meet the needs identified within an up to date Playing Pitch Strategy (and any annual review).</p>	<p>It was previously intended to change this wording to state that rural development should be of a scale that is proportionate to its setting, rather than that it must be small-scale. This would have avoided confusion for applicants over the definition of small-scale and allowed for interpretation by planning officers on a case by case basis taking account of site circumstances.</p> <p>Policy E10 has now been removed from the document, as we consider that its provisions are adequately addressed in the NPPF (in particular paragraph 145-146 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.</p>
Surrey Hills AONB		
	<p>Some employment development can benefit the rural economy where supporting the viability of a rural business. Also beneficial is development making use of existing buildings or of a small scale that supports local shops, community uses and the social and economic well-being of local people. However, not all employment development does this. Specialised jobs may be created that draw employees from urban areas. With no convenient public transport in most parts of the AONB those employees travel by private car adding to traffic on narrow country lanes.</p>	<p>It is not specifically stated in the NPPF that rural development policies should only benefit local residents of rural areas. The proposed uses that the draft policy considered suitable in principle in rural areas would have supported the rural economy by providing facilities that encourage spending in rural areas, thereby supporting the local economy (shops), attracting other shops and businesses to the area, and providing local jobs. Such facilities could therefore benefit local residents directly as well as indirectly, even if residents do not have the experience or qualifications to apply for a job in one of these sectors. Most development supported by the preferred approach would have in any case been small-scale.</p>
	<p>The current form of the chapter is capable of being used to support development proposals purporting to be in the interests of the "rural economy" but that are not in practice and do not help the local community or conserve the landscape and scenic beauty of the AONB. Somehow, it would be helpful if the above could be covered in this chapter.</p>	<p>The preferred approach is in line with NPPF paragraphs 83 (c) and (d), which state that sustainable rural tourism and leisure developments which respect the character of the countryside and local services and community facilities should be supported in rural areas. The preferred option wording states that the supported uses listed under the countryside heading must "respect the area's local character". This places the onus on developers of these uses to demonstrate that these uses would conserve the natural landscape.</p>

		<p>It is not clear that any of these uses would not be in the interest of the rural economy and the NPPF wording is generally supportive of them.</p> <p>Furthermore, the Plan should be read as a whole. LPSS Policy P1 already conserves the landscape and scenic beauty of the AONB and requires that development proposals are assessed against the provisions of the Surrey Hills AONB Management Plan.</p>
Surrey Wildlife Trust		
	<p>Supported. Regarding the list of approved uses, reference could be made specifically to 'eco-tourism', ie. as environmental educational/interpretational facilities (with additional Glossary entries as necessary).</p>	<p>The list of uses that are supported in principle were only examples, therefore it was not possible to list everything that could have been suitable. Eco-tourism was considered adequately covered under the existing reference to tourism facilities.</p>
West Clandon Parish Council		
	<p>The proposal to allow club houses in the green belt could lead to applications for facilities such as bars, restaurants, meeting rooms and the like which are typical for golf course club houses. We would like to see a tighter definition of the facilities allowable.</p>	<p>Prior to the decision to remove Policy E10 from the document it had been intended to remove the word 'clubhouse' in order to seek to prevent an influx of inappropriate applications, as it is one of two examples listed of a sport facility in this point, the other being sports pavilions. It is important to note however that any facility for outdoor sport or recreation would be assessed based on its visual impact on the openness of the Green Belt and other types of development may also be considered appropriate subject to the NPPF exceptions under paragraphs 145 and 146, and any sequential test requirements in the case of main town centre uses.</p>
	<p>The policy should address light pollution as well as noise.</p>	<p>It is not possible to control external lighting in all cases through policies. However, we consider that the issue is adequately covered elsewhere. The Biodiversity in New Developments policy P6 addresses lighting impacts on sensitive wildlife habitats, whilst policy D10a: Light Impacts and Dark Skies deals with light pollution's impacts on privacy and amenity as well as biodiversity. Policy D10: Noise Impacts deals separately with the impact of noise on sensitive receptors, including residents and the natural environment.</p>

	Provision of parking is referenced for some types of development but not others which seems inconsistent.	Parking for other forms of development is addressed by policy ID11: Parking Standards.
West Horsley Parish Council		
Policy: Countryside	Countryside – needs a point to include shops that are set up in conjunction with rural business e.g. not farm shops as such, but shops that sell from the premises of the rural activity e.g. Silent Pool Gin and others within the Surrey Hills Enterprise Scheme.	This was covered under point 2) (“Other farm diversification proposals, for example activity centres and arts and craft shops”).
	Tighter definitions are needed as in the saved 2003 Local Plan.	Had this policy been taken forward then some aspects of its wording would have been tightened in the final policy, taking account of other representations, however parts of the 2003 Local Plan policies were unnecessary to reproduce as they are either superseded by the Local Plan: Strategy and Sites and/or the NPPF.
	This policy needs to also have reference to the impact of buildings on locally and nationally important views e.g. from the AONB, and reference to the Surrey Hills Management Plan.	This is adequately covered by LPSS Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value.
The Woodland Trust		
	<p>There is great potential value for climate resilience and biodiversity gain as well as for the rural economy from embracing agricultural diversification to include tree-led uses such as agro-forestry, tree nurseries, and woodland burial sites. Developing tree nurseries is vital to enable a rapid expansion of UK-grown trees, reducing the disease risk of importing trees, improving biosecurity and contributing to green jobs.</p> <p>We would therefore propose rewording point 6) to make support for tree nurseries explicit:</p> <p>6) Horticultural and tree nurseries and other small-scale business enterprises</p> <p>We also propose adding</p>	<p>Policy E10 has now been removed from the document, however we agree with the proposed rewording of point (6) and the addition of point (7).</p> <p>The suggestion in the first sentence of the following paragraph (for development to make a positive contribution to protecting, restoring and connecting ancient woodland and the wooded landscape) is too onerous and could have prevented appropriate development from being approved. The second part of the paragraph (in relation to use of previously developed land) is covered by national policy for protected sites and LPDMP biodiversity policies.</p>

	<p>7) Natural and woodland burial sites.</p> <p>Any proposals for rural development should make a positive contribution to protecting, restoring and connecting ancient woodland and the wooded landscape. Use of previously developed land in the countryside should only be permitted if the proposal would not cause harm to areas of high environmental value.</p>	
Other respondents		
	<p>I know renewable energy is mentioned in D15 but I think consideration should be given to allowing low impact renewable energy more generally, for example using solar panels to complement livestock where the panels are not overly visably obtrusive</p>	<p>Low impact and renewable energy are supported by the LPDMP climate change policies, which address climate change adaptation as part of new building design. Case officers will have to balance considerations such as this when assessing the impact of planning applications.</p>
Preferred Option	<p>Impact on views within to and from the AONB should be included in the Preferred Option Box.</p>	<p>This point is adequately covered by the existing LPSS Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value.</p>
	<p>I am not convinced that we should be openly encouraging development in the rural economy where this may result in more hard surfaces and buildings on green space and/or create additional private car journeys.</p>	<p>We disagree, as to not support such development in principle would be in conflict with paragraph 83 of the NPPF, which states that <i>“planning polices... should enable the sustainable growth and expansion of all types of businesses in rural areas.”</i></p>
Paragraph 3.3	<p>I am concerned that paragraph 3.3, which states that “Local Plan policies need to strike a suitable balance between encouraging rural economies, maintaining and, where possible, improving the sustainability of smaller rural settlements, and conserving the character of the countryside”, seems to place economic development in opposition to conservation. In practice, that tends to mean that economic development will often take precedence. Instead, it is possible to encourage models where economic prosperity (which may be different to development) is founded in and works actively to support conservation and enhancement of the natural world.</p>	<p>Planning deals only with development, so planning policies are designed to set out what constitutes appropriate forms of development and where mitigation measures may be required to offset harm to the environment. A Local Plan development management policy can’t actively support conservation measures where no development is proposed.</p>

Paragraph 3.9	<p>In addition, while it is important to protect the countryside from over-development, it is also important not to protect it in a way that precludes natural processes, in particular rewilding. Paragraph 3.9 states that the borough's "attractive open countryside" should be protected. In practice, such open countryside is a form of human-created habitat, often created and preserved through conventional farming methods, which may provide a poorer form of habitat than an ecosystem that is allowed to develop naturally. Some open countryside can provide essential habitats but it is important that this is not protected at the expense of other, less intensively created, landscapes and ecosystems. For example, the protection of open countryside may be in competition with tree-planting schemes.</p> <p>There is no mention of biodiversity in this section, which seems to be an omission, even if there are other topics that specifically address biodiversity.</p>	<p>The biodiversity policies already protect and seek net gains of biodiversity in new developments and we consider therefore cover these issues adequately. To include biodiversity in Policy E10 would have created unnecessary duplication.</p>
	<p>The economic facts regarding farming show that the price of farmland is low and if another use can be made of it then the value changes. We are at risk of losing valuable assets. Once lost as farmland it will not be returned. A similar policy such as that you have to protect the lost of public houses should be introduced to protect and prevent further situations arising such as at Wanborough Fields. There should also be restraints on industrialisation. Non greenbelt areas now include INSET villages and particular provision needs to be made for such setting to preserve the village economy and feel</p>	<p>The restrictions in the preferred approach wording in relation to non-agricultural uses within farm holdings were designed to prevent unnecessary loss of viable agricultural land. However, Policy E10 has now been removed from the document, as we consider that its provisions are adequately addressed in the NPPF (in particular paragraph 145-146 in relation to Green Belt), by permitted development rights and elsewhere in other adopted and emerging Local Plan policies.</p> <p>The NPPF generally supports rural development and paragraph 146 considers the reuse of buildings within the Green Belt as not inappropriate provided they are 'of permanent and substantial construction'.</p>
	<p>Guildford now has nationally recognised leading vineyards and these should be mentioned in our assessment of our countryside economy.</p>	<p>The preferred approach wording already provided sufficient support for uses such as vineyards, as they are a form of agricultural /farm diversification which is included under the second point under 'Countryside'.</p>
	<p>Policy E10 – this is for Rural economy but it seems to focus on the phrases .."therefore in the interests of these communities, as well as important for the borough's economy, that rural businesses are supported and enabled where possible to develop and expand..." – it feels as if there is one eye on the council taxes and business rates</p>	<p>This comment is not entirely clear in regard to what is being suggested. The preferred approach, and the wording of paragraph 3.9, both sought to support rural businesses to develop and expand, in the interest of both rural communities and the rural economy.</p>

<p>here.....I feel it needs to read as more supportive of our rural businesses and not just the economy of GBC. Perhaps.....” therefore in the interests of these communities, as well as their importance to our local economy our rural businesses are supported and enabled where possible to develop and expand...”</p>	
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DRAFT

Policy E11: Horse Related Development		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey Nature Partnership		
p.31; para. 3.16	<i>“The keeping of horses and ponies is a popular leisure activity.... The keeping of horses can also have other adverse effects such as the erosion of bridleways, reduced pasture quality <u>and related impacts on opportunities for recovery of biodiversity...</u>”</i> (suggested insertion in red font and underlined).	Proposed wording has been added.
Other organisations		
Burpham Neighbourhood Forum		
Page 34, Para. 3.19	Stable bedding “muck out” piles which often steam and smell for months needs considering.	This issue is related to smell which we feel was adequately covered in paragraph 2) d) of the preferred option policy (renumbered as paragraph 1) e) in the Regulation 19 policy).
Page 35, Para. 3.22	Point (1) of Policy: There is recognised land size per horse requirements; this should be specified acreage per horse (1.5 acres next horse 1 acre).	The policy refers to the latest Government published standards for space per animal, to which a link is provided in the policy’s supporting text. This ensures that the policy will remain up to date if and when the standards change in future.
Page 35, Para. 3.22	We are concerned that the wording of sub section 1 does not adequately capture the need to meet Government Published standards. “Having regard to” should be replaced with “which complies with”.	Noted and wording of point 1) a) of the Regulation 19 policy has been changed accordingly.
Compton Parish Council		
	A policy that ensures owner details for horses/ land used for animal grazing is essential. Compton PC has experienced animals escaping (where fencing is not fit for purpose), which has in turn caused road traffic accidents.	The need for adequate fencing in compliance with the latest Government guidelines has been included in point 1) of the policy. This aspect of horse-related development and horse care is covered by the Defra

		Code of Practice, to which the policy refers as the latest published standards.
Effingham Parish Council		
	Agree the policy but there should be a clause added restricting horse-related development/buildings being converted into habitable accommodation.	This is not possible in the case of a sui generis agricultural unit as it would conflict with national legislation. Change of use to a residential dwelling in such cases is permitted development under Class Q of the GDPO, subject to prior approval and fulfilment of various conditions. In other cases, change of use is subject to planning permission. The NPPF considers the re-use or redevelopment of buildings of permanent construction in the Green Belt as suitable in principle, provided they preserve its openness (paragraph 146 d)).
Guildford Residents' Association		
	We support the inclusion of this policy. It would be helpful to specify all the government standards and guidance that apply to such development and the advice from reputable industry organisations.	The policy refers to the latest Government published standards for space per animal, to which a link is provided in the policy's supporting text. This ensures that the policy will remain up to date if and when the standards change in future.
	We would like to see lighting of external arenas added to the list of potential detrimental effects in 2(d), and the issue of manure warrants special mention – including 'smell' is not sufficient.	This issue is related to smell which we feel was adequately covered in paragraph 2) d) of the preferred option policy (renumbered as paragraph 1) e) in the Regulation 19 policy). Lighting of external areas has been added to point 1) e).
Holy Trinity Amenity Group		
	Permission for commercial developments might include a modest levy, based on number of horses, to help with maintenance of nearby bridle paths.	It would be beyond the remit of a Local Plan policy to seek financial contributions for developments that may not have a direct or cumulative adverse impact on bridleways. In general, developers are expected only to provide mitigation for proposals that would otherwise

		lead to an adverse impact; therefore, the usual process is to address such impacts by means of a planning condition. However, under this policy, if a commercial development is proposed without adequate evidence that it would not lead to adverse impacts, then permission will be refused.
Merrow Residents' Association		
	<p>Whilst it is both reasonable and correct to major on the advice in the Defra Code of Practice for the Welfare of Horses, Ponies, Donkeys and their Hybrids this code has very severe limitations from a planning aspect as it is more involved with the care of animals and the conditions under which they are kept and exercised which will in turn relate to the species, size and number of animals to be held on the premises.</p> <p>It would be wise to consult the British Horse Society website for livery yards and the standards required for hiring out horses in The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 Guidance notes for conditions for hiring out horses November 2018</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762420/animal-welfare-licensing-hiring-out-horses.pdf. This quite recent legislation is very broad and does cover the essential elements of the construction and operation of premises where horses are kept- although it relates to premises where horses are for hire the standards are applicable to other premises where horses are kept.</p>	<p>Noted. The BHS and Defra guidance are referenced within the supporting text and footnotes.</p> <p>The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 were also reviewed but not considered to warrant any amendments to this policy.</p>
	There are two significant omissions from this policy. The first is that stacking and removal of manure should be specifically covered as this is one of the most common causes of nuisance to neighbours and the general public. Secondly the lighting of outside arenas should be covered as in the same way this can be a real cause of concern and irritation to neighbours.	The existing reference to the impact of smell will cover the stacking and removal of manure. Consideration of the adverse effect of lighting of external areas has been included in this policy as an additional criterion to assess developments.
Ockham Parish Council		
	We would resist equine related development that would bring large numbers of vehicles onto minor rural roads which are already inappropriate for increased volume and could not support large horse related transport.	This should be sufficiently covered by the transport assessment requirements for larger-scale commercial developments within the proposed policy wording.
Residents for Guildford and Villages / Guildford Green Belt Group		

	<p>The requirement to have a policy relating to horse related development is considered necessary. However, the Local Plan 2003 provided separate policies for non-commercial horse related development (policy R12) and commercial horse related development (R13). It is suggested that to be effective separate policies should be prepared in the next iteration of the DMP to allow the determination of applications for different scales of horse related applications accordingly.</p>	<p>It was felt the document would be easier to read if criteria for commercial and non-commercial developments were within a single policy, rather than separate policies, particularly with the addition of new criteria which applied to both forms of development. Several of the criteria in the 2003 Local Plan policies R12 and R13 were duplicated in both policies.</p> <p>The Regulation 18 draft policy E11 had only a single criterion targeted at commercial developments (related to transport assessments). An additional criterion has been included to capture a point from policy R13 that was absent in the Regulation 18 draft policy E11.</p>
	<p>It is considered that further consideration is required to the expansion of this policy to include other animal related development. In rural areas of the borough, significant impacts on the amenity of the surrounding area have resulted from the development of, or expansion to, commercial dog kennels and the growth of dog walking / exercising sites.</p> <p>It is therefore recommended that the scope of policy E11 is strengthened and widened to capture additional animal related development.</p>	<p>Dog exercising/walking sites are not generally a material change of use requiring planning permission and therefore do not need to be considered against Local Plan policies. This applies whether a site is used for informal dog walking or for commercially run exercise/training activities.</p> <p>For dog-related developments that constitute a material change of use, for example kennels, adverse impacts on amenity are primarily likely to be noise related impacts emanating from dogs barking. These impacts are dealt with adequately by the proposed Noise Impacts policy D10. In the case of other temporary structures that may lead to visual impacts, it is considered reasonable that these should continue to be assessed against existing plan policies, including LPSS Policy P2: Green Belt.</p>
West Clandon Parish Council		
	<p>The policy should include requirements about light pollution from outdoor arenas and the need for control of rodents.</p>	<p>Lighting of external areas has been added to paragraph 1) e) in the Regulation 19 policy.</p>

		Rodents and other wild animals are a fact of life in the countryside and cannot be controlled through planning policies.
	<p>The draft states “<i>Particular consideration will be given to the cumulative adverse effects of proposals in the vicinity of the proposed site and the wider area</i>”.</p> <p>Presumably this refers to other horse related developments but it is not clear.</p> <p>By observation, many places keeping horses also have a random collection of horse boxes, trailers and caravans, some of which are useable but others are used to store hay or feed or are simply abandoned. These can be large and visually obtrusive in the landscape.</p>	<p>Additional wording has been added to clarify the meaning of this statement in point 2) of the Regulation 19 policy.</p> <p>The location of any permanent buildings proposed will be subject to assessment through the need to be integrated within existing buildings (point 1) d)). Additional wording in relation to impact on landscape character has also been incorporated in point 1) b).</p>
West Horsley Parish Council		
	The Policy needs to include a reference to the management of small caravans that often appear on the site of stables or where horses are being kept.	These are not considered to be horse-related developments. Unauthorised caravans which require planning permission are dealt with by enforcement rather than planning policy.
Other respondents		
	I am not convinced that the policy should go as far as supporting horse-related development. That weakens the case for refusal even where there are good grounds for doing so such as the additional buildings that are normally required. Adverse impacts on biodiversity can also arise from over-grazing – i.e. grazing at a density that significantly alters the immediate biodiversity potential of a site and affects existing wildlife corridors, for example through additional fencing.	The need to avoid adverse impacts on biodiversity including by means of overgrazing has been included within the policy wording. Where planning permission is required for it, additional fencing can also be considered for its potential for adverse impact on an area’s character.
	It is good to see the document acknowledge that "The keeping of horses can also have other adverse effects such as the erosion of bridleways". I gave up trying to ride my bicycle on bridleways in this part of the world precisely because horses' hooves make such a mess of the surface. However I don't see any evidence that the proposed Policy would address this issue.	The policy can only deal with the proposal on the site itself, however in relation to bridleway erosion paragraph 1) a) ensures that adequate land for grazing and exercising must be available in compliance with Government published standards. This will help to limit unnecessary deterioration of public bridleways.

Policy P6 Biodiversity in new developments (incorporated into new Policy P6/P7 Biodiversity in New Developments in the LPDMP)		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Natural England		
	We welcome the inclusion of policies P6: Biodiversity in New Developments and P7: Biodiversity Net Gain and the usage of the Biodiversity Metric 2.0 when delivering biodiversity net gain. The Chartered Institute of Ecology and Environmental Management, along with partners, has developed 'best practice principles' for biodiversity net gain, which can assist plan-making authorities in gathering evidence and developing policy.	Noted.
	<p>Support for extending biodiversity net gain to wider environmental net gain. Your authority should consider the requirements of the NPPF (paragraph 72, 102, 118 and 170) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space or biodiversity strategies. Opportunities for environmental gains, including nature based solutions to help adapt to climate change might include:</p> <ul style="list-style-type: none"> • Identifying opportunities for new multi-functional green and blue infrastructure, • Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) and climate resilient, • Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape, • Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links, • Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore), • Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habits. 	The council has adopted policies and is proposing further policies that address the matters listed. The policies taken as a whole will deliver environmental gain.

	Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.	
	Natural England recently published a 2nd edition of its Climate Change Adaptation Manual which includes a Landscape Scale Climate Change Assessment Tool. This tool can be used to identify natural assets (e.g. different habitats and species) in the borough and identify adaptation responses that can be incorporated into a plan to create a resilient landscape across the borough. A strategic assessment of natural assets and Green Infrastructure across the borough can be useful in planning for increasing borough resilience to climate change.	Noted. The Council intends to produce a Green and Blue Infrastructure SPD which will set out a spatial strategy for biodiversity. We will review the manual when it is produced.
	Consideration could also be given to whether the plan recognises the role of ecosystems and soils in carbon sequestration.	References have been added to the role of ecosystems and soils in carbon sequestration in the supporting text.
Environment Agency		
	We welcome this policy which seeks to prioritise biodiversity in all new developments.	Noted.
	We welcome the intention to produce a Green and Blue Infrastructure SPD but suggest a separate policy on Green Infrastructure and watercourses (Blue Infrastructure) is included. Please see answers to Question 22 - Policy D11.	A watercourse policy has been included as suggested and combined with the water quality policy. The policies in the plan taken together cover green infrastructure adequately.
	Biodiversity Opportunity Areas (BOAs) represent those areas where improved habitat management will be most effective in enhancing connectivity. However, they currently end at the outer edge of strongly urbanised land-uses. The SyNP's BOA document states that 'Ecological connectivity cannot be achieved if urban areas are permanently exempt from the network, so this is where Green and Blue Infrastructure strategies will play an especially significant role in establishing and defending urban wildlife corridors.' A good example of where a Green Infrastructure Policy has been applied locally is Policy DM11 in Wycombe District Council's Adopted Delivery and Site Allocations Plan for Town Centres and Managing Development (July 2013).	The proposed policies will deliver biodiverse developments that improve connectivity between habitats including within urban areas. The Council intends to produce a Green and Blue Infrastructure SPD which will further address ecological connectivity within settlements.

	<p><i>Green and Blue Infrastructure Supplementary Planning Document (SPD)</i> This document should map existing Green and Blue Infrastructure (GI) and future opportunities, prioritising GI where there are obvious gaps between designated sites and important habitats. This document should explain the multiple benefits of GI and how potential conflicts between these benefits might be managed, e.g. between increased public access and disturbance to wildlife.</p>	Agreed.
	<p>The long term success of biodiversity enhancements relies on on-going monitoring and management. There should be a requirement for a long term landscape and ecological management plan to be submitted to and agreed in writing by the Council, along with details of adequate financial provision, whether this is to be maintained by the developer/management company or given as a commuted sum to the Council.</p>	<p>Appropriate conditions will be applied to ensure the success of biodiversity enhancement schemes. Enhancements delivered through Biodiversity Net Gains will need to be secured for the period set out in the Environment Bill.</p> <p>The policy has been amended to reference long term management and the supporting text reflects the points set out in the comment.</p>
4.45	<p>Paragraph 4.45 on page 46 refers to incorporating wildlife corridors and gaps in barriers such as fences, walls and roads. The provision of mammal passage along watercourses where roads cross is particularly important for species such as the Otter. Otters have suffered dramatic declines in the UK until relatively recently. Although their population is beginning to recover and their range expanding, there is little evidence to suggest they are resident in the Wey catchment despite the habitat being suitable. Where otters are found at low densities, a single road death can delay the expansion of their range considerably. It's therefore important that new developments provide mammal passage under any new roads and existing roads where they are already present. This requirement should be included under 'Site design' in policy P6. Alternatively, this could be included in a separate policy on watercourses - please see Additional comments.</p>	<p>A reference to the need for mammal passage has been added to the supporting text.</p> <p>The new watercourse/water quality policy includes provisions for ecological connectivity, including the implementation of a buffer zone and protection for natural river banks.</p>
	<p><i>Site design</i> Policy P6 should also require the design of SuDS to maximise biodiversity opportunities. Where feasible, SuDS should incorporate above ground features that are designed to maximise their ecological and aesthetic value and improve water quality. Any outfalls should be via open flow routes that have minimal impact on the receiving watercourse.</p>	<p>The section Planting and Landscaping has been broadened to include The SuDS policy incorporates the principle that above ground SuDS features should be prioritised.</p>

Policy para 7)	Requirement 7 of policy P6 should require developments to control/eradicate invasive species where present, as well as avoiding their spread.	This has been amended to require eradication, or control if not possible, where invasive species are present on development sites.
Policy para 9)	<i>Sites that include or are adjacent to sensitive habitats</i> Requirement 9 of policy P6 states that 'Schemes should be designed to avoid light pollution' and that 'If a lighting strategy is provided, it should take account of the potential impacts on wildlife'. This should be strengthened to ensure there is no light spill into adjacent natural terrestrial and aquatic habitats, including buffer zones. Artificial lighting disrupts the natural diurnal rhythms of a range of wildlife using/inhabiting the river and its corridor habitat. River channels and waterbodies with their wider corridors should be considered Intrinsically Dark Areas and treated as recommended under the Institute of Lighting Engineers "Guidance Notes for the Reduction of Light Pollution". Please also see answers to Question 22 - Policy D11 for recommendations on a policy for watercourses/buffer zones.	The supporting text sets out the need to exclude light intrusion from river buffer zones and references the policy Dark Skies and Light Impacts which sets out provisions that prevent light impacts on sensitive habitats. The recommended text is included in the supporting text for that policy.
Policy para 10)	Requirement 10 of policy P6 states that 'Development that contains or is adjacent to a watercourse should retain or provide an appropriate buffer between built development (including parking areas, private gardens and landscaping) and the watercourse, composed of natural or semi-natural habitat.' This requirement should be strengthened to state a 10m minimum buffer between the top of the river bank (defined as the point at which the bank meets the level of the surrounding land) and the development on either side of the watercourse. This width of buffer provides the minimum width of habitat needed to provide for the functioning of wildlife habitats, while being able to facilitate informal access for enjoyment of the river. This width also ensures that the river is buffered from land-based activities, thereby avoiding shading from buildings, reducing the levels of diffuse pollution reaching the watercourse and allowing the watercourse to adjust its' alignment as it naturally erodes and deposits without the need for damaging bank protection. The buffer zone should be considerably larger on previously undeveloped land. Please also see answers to Question 22 - Policy D11 for recommendations on a policy for watercourses/buffer zones.	The new policy on water has been amended to include a minimum 10 metre buffer zone between development and main rivers (it was clarified that main rivers are what the Environment Agency's representation refers to). In order to protect ordinary watercourses, an extra sentence has been added expecting a buffer sufficient to protect and enhance the biodiversity and amenity value of the watercourse. Text has been added to the supporting text setting out the reasoning provided.
	Policy P6 should also require developments to enhance watercourses and their riparian corridors where a watercourse flows through or directly adjacent to the site.	Adopted policy ID4(7) states "The ecological, landscape and recreational value of watercourses will be protected and enhanced.

	<p>A separate advice note or SPD, similar to the one produced for Wycombe District Council (River Wye Advice Note) could help to provide advice to developers and landowners on how to protect and enhance the river environment. The River Wye Advice Note includes sections on the design of new riverside development (and the inclusion of buffer zones); landscape design of the river bank; public access; surface water run-off and the avoidance of pollution; and weirs/barriers to fish passage. Please see Additional comments.</p>	<p>Development proposals that are likely to have an adverse impact on the functions (including across their catchments) and setting of watercourses and their corridors will not be permitted.” The supporting text states “4.6.55 Development likely to affect a watercourse should seek to conserve and enhance the ecological, landscape and recreational value of the watercourse and its associated corridor.” As a result, we do not think further policy protecting and enhancing watercourse corridors is necessary. The supporting text for the new policy on water includes a reference to ID4 and sets out a definition of a watercourse corridor. The policies as a whole protect and enhance river habitat and cover the measures mentioned in the comment.</p>
	<p>In addition, this policy should also mention the enhancement of ecological features, such as ponds where they don't qualify as Priority Habitat and therefore aren't covered under policy P9 but provide an opportunity to be enhanced so that they do qualify.</p>	<p>The policy has been amended so that all aquatic habitats are treated the same as priority habitats. The new water and SuDS policies contain provisions that protect and will deliver enhancement for the water environment which includes natural and historic ponds (as set out in the supporting text). The Biodiversity Net Gains approach set out in P7 and nationally through the Environment Bill is aimed at providing enhancements to all types</p>

		of habitat on site, including ponds. Standing water is identified as a key habitat in some of the borough's BOAs and therefore will be targeted for enhancement through policy ID4 and P6.
	Policy ID4 of Guildford BC's Local Plan Part 1 only includes a requirement for preventing harm to national and local sites, not enhancing them. This should be addressed in policy P6 by requiring developments within/adjacent to a nationally or locally designated site to protect, as well as enhance these sites.	Policy P8/P9 requires designated sites to be enhanced.
Historic England		
	Agree; protection and enhancement of biodiversity very often has direct, as well as incidental, benefits for the historic environment.	Noted.
Surrey Nature Partnership		
	Largely supported. Minor corrections to the supporting text proposed.	Noted. Corrections have been made.
Other organisations		
Surrey Hills AONB Board		
	Strongly support.	Noted.
Woodland Trust		
Section 5	We recommend setting a target for tree canopy cover as part of this policy, to be pursued through the retention of important and mature trees; appropriate replacement of trees lost through development, ageing or disease; and by new planting to support green infrastructure. In order to meet the challenges posed by the climate and nature emergencies, the Woodland Trust recommends a minimum 30% tree canopy cover target for new development land. Further guidance is available in the Trust publication, Emergency Tree Plan for the UK (2020).	A minimum 30% tree cover target would not be achievable in all development (e.g. a town centre regeneration site). Where it could be applied, it would be highly constraining and limit what could be achieved e.g. in terms of design or other enhancements to other types of biodiversity.

		<p>The Surrey Nature Partnership supports tree planting in the right places and circumstances but has noted that tree planting can have a detrimental impact on other sensitive habitats, which are often a higher priority in Surrey².</p> <p>The proposed suite of policies supports the planting of trees to create new canopies through general biodiversity policy and biodiversity net gain, but in a manner that avoids harm to important habitats.</p>
Holy Trinity Amenity Group		
	<p>Agree with the policy, subject to modifications. Current problems include:</p> <ul style="list-style-type: none"> • Landscaping and gardens are increasingly planted to be low maintenance and to mature rapidly • Inadequate tree planting including on GBC land and SCC highways land • Garden space lost to extensions (particularly single storey extensions which waste space) • Loss of front gardens to hard surfaces <p>A clear policy on planting of indigenous species that are suitable for local conditions is needed with quantitative targets. An SPD is justified. This should apply to householder applications as well as larger developments as some involve large extensions that are detrimental to biodiversity.</p>	<p>The policy has been amended to extend the expectation for the use of UK sourced, native species (except where imported strains would offer greater resilience e.g. to disease) in tree planting to cover all planting. The policy expects planting schemes to incorporate species, habitats and management regimes that provide best biodiversity benefit. This would include species suitable for local conditions.</p> <p>A Green and Blue Infrastructure SPD will be produced to provide detailed guidance.</p> <p>In many cases, the measures listed in this comment would be Permitted</p>

² See https://surreynaturepartnership.files.wordpress.com/2020/03/tree-planting-for-climate-change-mitigation-in-surrey_snp-january-2020_final.pdf

		Development and would therefore not be subject to planning policy.
	The borders of the Wey, including most of the flood plain, to be kept natural, and treated as a wildlife corridor, hard banks avoided, not urbanised, disturbance minimised.	This is covered by policy ID4 of the existing local plan and further provisions are proposed in the new policies, notably buffer zones along watercourses, prohibition on hard banks, and support for naturalising existing hard banks.
	Street trees are be required wherever possible, in accordance with the government “manual for streets”.	The policy would support tree lined streets as a positive biodiversity measure, unless detrimental to other, more valuable biodiversity measures (e.g. trees clustered to create canopies). In line with the NPPF revisions in 2021, the design policies have been updated to reflect the support for tree-lined streets.
	Parking spaces should be on semi-green, porous surfaces.	Policy P13 requires the use of permeable surfaces wherever possible. Policy P6 requires development to seek opportunities for biodiversity wherever possible, which includes planted parking spaces.
Normandy Action Group		
	Disagree. The existing policy fails to address para 175 of the NPPF: “c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons	The protection of irreplaceable habitats is covered by policy P8/P9.

	and a suitable compensation strategy exists". Para 1 of the preferred option should be modified as follows: " "1) Requires new developments to prioritise biodiversity in their proposals as a general principle and protect existing irreplaceable habitats (such as ancient woodland and ancient or veteran trees) "	The policy wording reflects the NPPF wording.
Weyside Urban Village		
	The preferred option generally matches the emerging aspirations for the proposed WUV development. However, the River Wey BOA boundary is not clearly defined, so it would be useful for defined boundaries to be set out as part of any eventual policy or as an Appendix.	A map of the Biodiversity Opportunity Areas boundaries will be included in the policies map. However, it should be noted that the boundaries are meant to be indicative.
	Many of the measures such as planting schemes & landscaping, measures on building structures etc. seem to be the detail of how a development would deliver Biodiversity net gain, the requirements for which are set out in policy P7. A single Biodiversity Policy may offer a potential alternative approach to ensure consistency in interpretation and best use of the policy. Brown roofs should also be referenced in criterion 6.	Agree. The two policies have been combined. Brown roofs have been added to the policy.
	Guidance could be added to suggest that flood and surface water run-off mitigation measures such as drainage ponds should also encourage biodiversity and not be over engineered structures.	This has been added to the supporting text and is covered further in the proposed Sustainable Surface Water Management policy.
Cranley Road Residents' Association		
Policy para 1) and 5)	(New developments to prioritise biodiversity). This should specify retention of features of value as well as creation of new features. (Tree canopies expected to be retained). Not only tree canopies but other features of value should be retained where possible especially those not readily recreated or those that provide reservoirs for colonisation of new wildlife spaces.	The policy has been amended to refer to the mitigation hierarchy, which prioritises retention over creation. Additionally, this approach is built into the national biodiversity net gain approach. Policy P8/9 protects existing biodiversity features of value.

Policy para 10)	Reference should be made to the benefits of effective buffers along roads as well as along water courses.	Watercourses are sensitive habitats and detailed protective measures are justified. Referencing buffers along all roads would likely be considered overly prescriptive as it would constrain the delivery of other measures on development sites, including biodiversity measures.
Send Parish Council		
	The policy needed but the proposed policy is not strong enough. It is essential that robust policies are designed to protect “existing” biodiversity and avoid the use of ‘planning conditions’ as mitigation the easement of planning applications and for biodiversity loss. This policy needs to be much stronger, specific and more demanding.	This policy focuses on biodiversity provision in new development. Other policies protect existing biodiversity. The new policy references the mitigation hierarchy which priorities existing biodiversity over new.
Guildford Residents’ Association		
	Please spell out ‘Biodiversity Opportunity Area’ when BOA is first mentioned. We suggest a reference to a borough level map of BOAs (i.e. more detailed than the county map shown in Policy ID4).	The full name has been added to the first mention in the policy. A map of the BOAs will be added to the policies map.
Policy para 6	In 6), there should be mention of ‘roosting’ as well as ‘nesting’	‘Roosting’ has been added to the measures, which are now identified in the definitions section of the supporting text.
Guildford Society		
	A large-scale map to show the exact boundaries of the BOAs will be needed.	The BOA boundaries will be added to the policies map.

	The policy should also apply to major redevelopments e.g. offices become flats where there may be considerable changes in the surroundings of a building that need to be considered.	The policy applies to all new developments and will apply to redevelopments where they require planning permission.
Bridge End Farm		
Policy para 1)	Support the objectives of the policy but concern over prescriptiveness. The requirement to prioritise biodiversity is not justified as biodiversity is one of a number of important objectives which need to be considered in combination when bringing forward new development.	The reference to prioritising biodiversity has been deleted and the policy now requires developments to maximise biodiversity gains as a general principle.
Policy para 5)	5) states that tree canopies are expected to be retained. We consider that this is not justified as currently presented, because there are on occasion a variety of reasons why it may not be appropriate to retain a tree(s) either due to lack of quality, or strong masterplanning reasons. As such we would suggest an amendment to this part of the policy to provide flexibility for tree removal and appropriate replanting. As such the policy could be reworded to include 'Tree canopies are expected to be retained where possible and new and replacement tree planting is expected to focus on the creation of new connected tree canopies or the extension of existing canopies.'	The planning process allows for flexibility if there are circumstances where retaining a tree canopy would not be appropriate or lead to the best outcome. The policy acknowledges this by presenting retention as an expectation rather than a requirement. The NPPF as revised in 2021 requires the retention of existing trees wherever possible. In addition, the approach to biodiversity net gains and the mitigation hierarchy both require the retention of existing biodiversity features (including trees) wherever possible before additional planting is considered.
Merrow Residents' Association		
	Support with amendments: the measures on building structures should include integral roosting features for bats as well as nesting boxes (bats 'roost', birds 'nest').	"Roosting" has been added to the policy.

	<p>Built features are expected to be permeable for wildlife. More detail here would be useful, e.g. development boundaries should be permeable to wildlife also.</p>	<p>Further detail is provided in the supporting text. The reference to permeable boundaries has been added.</p>
<p>Compton Parish Council</p>		
	<p>Policy P6 does not go far enough. Buffer zones around environmentally sensitive areas should be specified that take into account the type of development adjacent to a particular area. For example, a buffer zone of 50m should be introduced with regard to any road, whereas a narrower buffer might suit a cycle way or sports ground.</p>	<p>The policy requires buffers around sensitive habitats, the extent of which will be decided on a case-by-case basis, taking into account the specific habitat. We do not think it would be considered reasonable at examination to specify further buffer zones unless there is a specific legal basis or national policy support (e.g. as there is for the Thames Basin Heaths, Ancient Woodland or main rivers). Appropriate buffers will be considered on a case by case basis.</p>
<p>Burpham Community Association</p>		
	<p>Agree with amendment: It should require improvement or recovery of biodiversity including creating environments suitable for reintroduction of lost species.</p>	<p>Policy P7 Biodiversity Net Gain requires an increase in biodiversity value from new developments. This can include habitat creation and restoration. Under the net gain approach, the most important habitats and species will be targeted for improvements by virtue of their greater weighting in the Biodiversity Metric methodology. The policy identifies priority habitats and species by virtue of reference to the BOAs and future Local Nature</p>

		<p>Recovery Strategy (LNRS). It will be down to the body that produces the LNRS (which will be set by the Environment Act) to decide which habitats should be targeted in order to restore lost species.</p> <p>The policy supports the restoration of BOA priority habitats, which in many cases will assist in the spread of species including those that may now be absent from the borough.</p>
East Horsley Parish Council		
	<p>Agree with suggestion: Since parts of Guildford borough have adopted Neighbourhood Plans which include Biodiversity policies that form part of their Local Development Plan, a reference to their applicability would also be appropriate within this policy.</p>	<p>Neighbourhood plans are Development Plan Documents (DPD) in their own right and will be read alongside the Local Plan and other DPDs.</p>
Effingham Parish Council		
	<p>Effingham Parish Council (EPC) has produced a Neighbourhood Plan (ENP) that has a section on and policies for the local Environment. These policies were worked on closely with planners from GBC. The policy should explicitly mention biodiversity networks such as Wildlife Corridors and Stepping Stones, and B-lines (as in 4.54 here which are essentially wildflower pathways for insects), which are important eco-systems outside BOAs. These are not emphasised in the document in spite of being highly important for wildlife.</p>	<p>Neighbourhood plans are Development Plan Documents (DPD) in their own right and will be read alongside the Local Plan and other DPDs.</p> <p>The policy at paragraph 3 expects new developments to be guided by national, regional and local strategies which would include the biodiversity networks mentioned in the comment. The list of relevant strategies is subject to change and the forthcoming Environment Bill (and possibly planning bill) are likely</p>

		to alter the strategic framework so we think it is better not to list the relevant strategies in the policy. It is intended to include the list in an SPD so that updates can be made more easily.
Shalford Parish Council		
	AGLV should be included and recognised for its value in relation to biodiversity as well as measures listed.	AGLV is designated for its landscape value rather than biodiversity value.
Portland Capital		
	<p>Policy wording should be updated to allow flexibility on the provision of biodiversity features (planting/landscaping, measures on building structures and site design) where this may compromise wider residential delivery and be reviewed on a site by site basis (particularly in the context of historic housing under-delivery). This reflects the NPPF:</p> <p>Para 67: “Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, <u>taking into account their availability, suitability and likely economic viability.</u>”</p> <p>Para 122: Relates to achieving appropriate densities and states planning policies and decisions should support development that makes efficient use of land, taking into account (amongst other criteria) – local market conditions and viability.</p>	<p>The design part of the policy sets out how biodiversity should be approached in the design and delivery of new developments. It does not quantify the outcome, so is considered to fall within normal development costs.</p> <p>The Biodiversity Net Gain section quantifies net gains and will have an impact on development costs. The plan will be subject to a viability assessment to ensure viability is not compromised. There is scope for decision makers to consider viability again on a case-by-case basis where there is justification for doing so.</p> <p>The planning system allows for flexibility where it can be demonstrated that deliver is threatened.</p>

Policy 9) and 10)	With regards to the reference to sites that include or are adjacent to sensitive habitats, policy needs to be specific as to what these comprise and provide detail on appropriate buffers between built development and sensitive habitats. Again, a requirement for such provision will have viability implications for deliverability and viability which should be recognised in final policy wording.	The policy has been reworded to make it clear which habitats and designations are protected (note, this provision has been moved to paragraph 1 of policy P8/P9). Some buffers are already established (for example, around the Thames Basin Heaths) and the policy proposes specific buffers for water courses and ancient woodland based on the known sensitivities of those features. It is not feasible to quantify the buffer for all sensitive habitats as this will differ from habitat to habitat and site to site.
Thames Water		
	There appears to be policy overlap between Policies P6 and P7 – with P6 seeking to maximise biodiversity and then P7 to deliver biodiversity net gain. The inter-relationship and overlap between the policy approaches represents risks to the implementation of the policies through development management processes. A single Biodiversity Policy should be considered as a potential alternative approach.	The two policies have been combined.
Hallam Land Management		
Policy para. 6 a)	The NPPF at paragraph 175d states “...opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity”. The Council’s preferred approach as set out in Policy 6(a) is to “Require new developments to prioritise biodiversity in their proposals as a general principle”. This infers that biodiversity will be given a primacy in the consideration of development proposals; whereas individual development proposals often have to balance a range of competing interests which require equitable consideration because of the characteristics of sites and locations and also other legitimate planning policy objectives. The Development Plan must be read as a whole and therefore a policy which seeks to prioritise biodiversity could be at odds with other policies.	The reference to prioritising biodiversity has been deleted and the policy now requires developments to maximise biodiversity gains as a general principle.

	<p>The terms “as a general principle” is therefore especially important and serves as a necessary qualification because there may be instances where other objectives are rightly afforded a greater priority.</p>	
Reach Plc		
	<p>Do not agree with the scope of the policy which seeks to maximise biodiversity gains in ‘all new developments’ as it is not always practical to do this. For example, when redeveloping a site or changing the use of a building(s) as the design of such sites and the associated removal/inclusion of any trees, shrubs etc. is often dictated by existing site constraints/conditions.</p> <p>On this basis, suggest that any future policy states ‘maximise biodiversity gains in all new developments, <u>where possible</u>’.</p>	<p>We do not agree that the addition of “where possible” is necessary as the planning process allows flexibility where the outcomes sought by policy are not possible. “Maximise” means to do the most possible, which can apply to any site regardless of circumstances.</p>
West Horsley Parish Council		
	<p>Of grave concern are the facts stated at 4.6 and 4.7 whereby Guildford Borough’s situation is significantly worse than elsewhere in the country and nationally. Critical levels have been reached in priority habitats. This needs urgent attention and so the policy wording needs to be considerably strengthened. This policy needs to be much stronger, specific and more demanding.</p> <ul style="list-style-type: none"> • There is no accountability for delivering, e.g. new tree planting at point 5 is expected to focus on, it should say MUST focus on. • A specified net increase in biodiversity should be demanded for ALL levels of development, there should not be a get out clause to supply elsewhere in the Borough. • 4.38 refers to OPM but is only given three lines – it pales into insignificance and should have far more detail provided. Guidelines on buffer zones should be given as avoidance strategies. • Point 9 needs the lighting element as a separate point, it is not only the impact on wildlife, but also the environment overall and there should be mention here of Dark Skies with reference to Neighbourhood Plans as both West Horsley and Effingham have policies on this. 	<p>The word expect has been used because there are likely to be some instances where it is not beneficial to group trees together (e.g. where this would fragment a non-arborial habitat). The use of ‘expect’ indicates that applicants should do so unless they can demonstrate it is not justified.</p> <p>The policy on biodiversity net gain sets a standard for all levels of development, but not all types of development. Certain types are proposed to be exempt nationally. While we are proposing to increase the amount of gain, we do not think that there is adequate justification to diverge from the national exemptions.</p>

		<p>OPM is largely not a planning matter as it dealt with through legislation other than planning legislation. It may be a planning matter where it falls on or around a development site and would present a risk to future occupiers of a development. A buffer zone is not necessary as where OPM is identified it must be eradicated.</p> <p>Policy D10a sets out policy that prevents harm from lighting. This includes a reference to neighbourhood plan policy in the supporting text.</p> <p>The Development Plan is read as a whole. Neighbourhood Plans are Development Plan documents in their own right and their policies do not need to be referenced in the policy.</p>
Taylor Wimpey		
	<p>Suggest that the order of biodiversity policies is altered to reflect the hierarchy of ecological importance, mitigation hierarchy and level of legal/policy protection: Irreplaceable Habitats, Priority Species and Habitats on Undesignated sites, Biodiversity Net Gain, and finally, Biodiversity in New Developments.</p>	<p>The policies have been merged into two policies. The sequence has not been changed at this stage as it would complicate the examination, but will be amended as suggested before adoption so that protection comes before delivery of new biodiversity.</p>
Policy para 1)	<p>GBC's preferred approach as set out in Policy 6(a) is to "Require new developments to prioritise biodiversity in their proposals as a general principle". This infers that biodiversity will be given a primacy in the consideration of development proposals; whereas individual</p>	<p>The reference to prioritising biodiversity has been deleted and the policy now requires</p>

	<p>development proposals often have to balance a range of competing interests which require equitable consideration because of the characteristics of sites and locations and also other legitimate planning policy objectives. The Development Plan must be read as a whole and therefore a policy which seeks to prioritise biodiversity could be at odds with other policies. The term “as a general principle” is therefore especially important and serves as a necessary qualification because there may be instances where other objectives are rightly afforded a greater priority.</p> <p>Suggest amendment: ““1) Require new developments to <u>consider</u> biodiversity in their proposals as a general principle”.</p>	<p>developments to maximise biodiversity gains as a general principle.</p>
<p>Policy para 2)</p>	<p>Suggest the following amendments to ensure the policy is clear and justified, as per Paragraph 35 of the NPPF:</p> <p>“2) Requires developments within or adjacent to a Biodiversity Opportunity Area (BOA), <u>where possible, to contribute towards</u> the achievement of the objectives of the relevant BOA Policy Statement to protect the designated and priority habitats and species in the BOA <u>in accordance with the provisions of Policies P8 and P9, and to improve habitat connectivity across the BOA.</u>”</p> <p>TW propose that ‘contribute towards’ replaces ‘support’ as it is a more accurate phrase. Also, the phrase ‘where possible’ should be added because not every development will be able to contribute towards the achievement of every BOA objective, given that these objectives are defined for very large areas, comprising a diverse range of habitats, including some that are subject to national and international nature conservation designations. In accordance with the provisions of Policies P8 and P9’ is added, because these policies define the nature of the ‘protection’ required, and without this context, ‘protect’ can imply that no effects whatsoever are permitted.</p>	<p>The paragraph has been written with the three criteria in a sub-list to make it clearer.</p> <p>We do not agree that the addition of “where possible” is necessary as the planning process allows flexibility where the outcomes sought by policy are not possible.</p> <p>We agree that “contribute towards” is clearer than “support” and have made this amendment.</p> <p>The plan is read as a whole, so we do not agree that “in accordance with the provisions of Policies P8 and P9” is necessary. The protection is limited to the specific designated and priority habitats and species within the BOA.</p>
<p>Policy para 5)</p>	<p>Suggest para 5 is altered to the below in order to improve its clarity and ensure that the policy is positively prepared, as per Paragraph 35 in the NPPF:</p> <p>5) Existing trees should be retained where possible, or where new tree planting is proposed, this should focus on the creation of new connected tree canopies or the extension of existing canopies.”</p>	<p>We do not agree that the addition of “where possible” is necessary as the planning process allows flexibility where the outcomes sought by policy are not possible.</p>

Policy para 9)	<p>TW seek the following changes to Part 9 in order to ensure that the wording is consistent with the other requirements in this policy:</p> <p>9) Where sites contain or are adjacent to sensitive habitats, appropriate buffers should be incorporated... Schemes should be designed to <u>minimise</u> light pollution. If a lighting strategy is provided, it should take account of the potential impacts on wildlife.</p> <p>The text “And, where necessary, barriers” should be deleted. The inclusion of barriers adjacent to sensitive sites directly conflicts with the previously stated requirement to improve habitat connectivity and reverse fragmentation and species isolation. The replacement of ‘avoid’ light pollution with ‘minimise’ acknowledges that complete prevention of all light pollution may not always be achievable.</p>	<p>Agree that “minimise light pollution” is more correct than “avoid light pollution” so this change has been made, and the provision has been moved to policy D10a.</p> <p>The point about barriers is taken. However, some sensitive habitats may need protection from disturbance; the borough has experience of impacts on sensitive sites, e.g. from local people clearing the land or creating cut-throughs. The supporting text has been amended to make it clear that barriers should apply to people but not inhibit the movements of wildlife or the dispersal of plants.</p>
Burpham Neighbourhood Forum		
Para 4.5	It would be good to identify and list all species [in Surrey] and those lost.	Information about species present in Surrey is available from other bodies. We do not think it is necessary to include a list in the Local Plan.
Para 4.35	What plants does Xylella Fastidiosa affect? Needs identifying if mentioned and using both English and Latin names would be helpful.	The reference to this specific disease does not appear in the plan as drafted.
Para 4.42	This paragraph should be re-worded to encourage the designation of green spaces as new ‘Local Green Space’. Future development which includes land currently designated as ‘Local Green Space’ must carry forward the existing designation.	The Local Green Space designation can only be applied to spaces that have a specific value and cannot be applied to ordinary green spaces delivered by new developments. The designation (and amendments to it)

		<p>can only be made through a Development Plan Document such as a Local Plan or Neighbourhood Plan. Development cannot remove the designation which means it will be carried forward. We do not believe that groups producing neighbourhood plans need encouragement from the Local Plan to designate Local Green Spaces as the designation has been popular with neighbourhood groups.</p>
Para 4.55	<p>[Re: intention to produce a Green and Blue Infrastructure SPD] We are concerned plan preparation has progressed to this stage without more detailed understanding of desired Green and Blue infrastructure which is essential to enabling appropriate levels of development.</p>	<p>The Surrey Nature Partnership has produced a framework for nature recovery across Surrey and this has informed production of new policies. The national approach to biodiversity is still emerging and at this stage it is not clear what role district level councils will play. This will become clearer with the passage of the Environment Bill and the Planning Bill. Alongside this the Surrey Nature Partnership is setting out more detail on the approach to nature recovery for Surrey.</p> <p>SPDs are guidance for adopted policy and necessarily must follow on from the adoption of policy. However, the proposed policies have been designed to provide a firm policy basis for the future SPD.</p>
Policy para 9)	<p>Current lighting practices do not follow this concept of 'Dark Skies'.</p>	<p>The majority of lighting does not need planning permission and</p>

		therefore cannot be governed by planning policy. However, schemes can be designed to minimise light spillage and this can be addressed through policy because design is a planning matter. Some schemes that would produce significant amounts of light may require a lighting strategy. New policy Policy D10a: Light Impacts and Dark Skies addresses both lighting strategies and scheme design to minimise light spillage.
Other respondents		
4.7	“Priority should be given to conserving species that are locally rare and in decline, even if the national population is stable”, should not mean preserving human-created habitats, especially those created as a result of intensive agriculture, at the expense of ecosystems that are allowed to evolve naturally.	Surrey’s landscape and habitats have been strongly influenced by human activity and many of our most important habitats are semi-natural. Many semi-natural habitats are rich in biodiversity, which will be lost if the habitats are allowed to disappear. As a result, important semi-natural habitats should be protected.
4.29	Planting wildflowers on roundabouts and verges will not work because the flowers will be pushed out by grasses and weeds after a couple of years leaving the land looking unkempt. A designated site for proper re-wilding would be more acceptable – the creation of an area of wildflower meadow which could be appreciated by the public. This is just an excuse to reduce costs.	With light management wildflowers can be maintained. The Environment Bill proposed a national system of biodiversity credits and nature recovery networks which would lead to the delivery of dedicated sites for rewilding. The policy supports the creation of biodiversity sites, which would cover a dedicated rewilding site (if planning

		<p>permission is required e.g. for change of use from agriculture).</p> <p>Using lighter management regimes can result in reduced costs, which would be considered an additional benefit.</p>
4.30	<p>(Regarding connecting tree canopies) Meadows are scarcer than woodland and also capture carbon. If managed appropriately, they contribute biodiversity that cannot exist in woodland with a more or less complete canopy.</p> <p>Extending tree canopies may be appropriate in some circumstances but it is important not to remove corridors for existing species that depend on open conditions. Cutting a gap through woodland to connect open areas while maintaining a narrow canopy bridge for species such as Hazel Dormouse is a valid strategy.</p> <p>Item 5) in the preferred option needs some minor modification to permit retention of existing species and corridors where appropriate.</p>	<p>This point is agreed. Planning policy introduces protections for a range of valuable habitat types. The plan is read as a whole so the creation of tree canopies on development sites will not lead to detrimental impacts on other types of habitat.</p> <p>The Surrey Nature Partnership highlights the point that inappropriate tree planting can detrimentally affect other valuable habitats (see 4.31).</p> <p>Paragraph 5 has been amended to prevent the creation of new canopies where this would impact on sensitive species or habitats. The supporting text explains the sorts of impacts that should be considered. The policy includes reference to the mitigation hierarchy which prioritises the retention of existing habitats.</p>
4.31/2 Policy para 5	<p>Disagree with tree canopy policy. Tree canopies are expected to be retained But some sites are already cutting down the trees (e.g. Admirals Park – Tongham).</p> <p>Canopies of trees can result in darkness.</p>	<p>Planning policy is only engaged where planning permission is sought. Where trees do not need permission to be cut down, planning policy cannot have an impact. However, the Biodiversity Net Gain supporting text sets out that land must not be artificially degraded prior to a</p>

		<p>planning application, and that the Council will use the value of the site prior to clearance as the baseline and apply any available punitive measures.</p> <p>It is acknowledged that canopies can result in darkness. Shade can be beneficial (e.g. for urban cooling) and the planning system allows for canopies not to be sought where they would be problematic.</p>
4.31/2	The text should mention placing trees strategically in the town centre.	<p>Under the proposed policy, town centre developments will have to consider how to incorporate trees and other habitats where possible. Placing trees in the town centre outside of development sites would likely not require planning permission so does not need to be addressed by planning policy.</p>
4.33	(Regarding wildflowers and trees occupying the same space) This only applies to a limited range of wildflowers and their associated wildlife. It eliminates much of the wildlife that depends on open conditions further into the season.	<p>The referenced text has not been used in the draft plan.</p> <p>The point about canopies and wildlife is noted. Canopies will not replace other forms of habitat creation and the policy contains provisions to prevent tree planting harming other habitats.</p>
4.41	Balancing ponds - Health & Safety is not mentioned and ponds attract children. Should include mention of ponds being fenced and gated so they can be accessed but not by small children.	<p>The plan includes a policy on sustainable drainage that requires designs to follow technical guidance. SuDS designs will be subject to</p>

		review by the Lead Local Flood Authority.
4.45	(Adaptation of built areas for wildlife permeability) How can anything in this para be achieved except through personal preference? Is the DMP insisting that all private gardens are surrounded by holey walls? Will it become illegal in Guildford – or the subject of planning applications – and can it? – for residents to change their garden wall/fence etc in the interests of wildlife?	The DMP will form planning policy and as such it will only apply to new developments that require planning permission. The changing of a fence or wall could require planning permission depending on the size and location. Anyone not seeking planning permission would not be bound by its provisions, though it may act as a guide for someone seeking to support nature.
4.45	Drains can trap amphibians and I believe means are available to prevent this that could be incorporated in new site design requirements (including roads). This could be added to the potential adaptations listed.	A references to amphibian ladders in drains have been added to the definitions section.
4.46 Policy para 8)	The policy expects “major schemes to include resources that encourage community ownership of greens spaces”. How will this be achieved?	The supporting text includes a list of potential measures; interpretation boards, bespoke 'blinds'/hides, educational engagement, the involvement of local volunteer groups and access arrangements.
4.46 Policy para 8)	Local volunteer involvement helps with community engagement so if there is a way that new residents can be encouraged to participate in future management, without reducing the involvement and commitment of the developer, that would be good. Perhaps some form of follow-up by the local authority to kick start it would be appropriate ? I acknowledge that it may be best addressed outside the planning policy.	Local volunteer involvement could be arranged through developer pre-application consultation or bespoke engagement. This has been added to the information about community engagement.
4.53	It is important not to assume that land outside BOAs is of less biodiversity value. I understand that BOA designation had to follow strict rules and can specifically exclude land	It is agreed that land outside BOAs can have high biodiversity value.

<p>Policy para 2)</p>	<p>with exceptional biodiversity, or biodiversity potential, as a result. 4.54 goes some way towards rectifying this. Policy Item 2) must be extended, or a separate point included, as priority habitats and species also exist beyond BOAs (and not necessarily just adjacent to them).</p>	<p>BOAs indicate areas where specific habitat measures will have the greatest biodiversity benefit and do not identify the areas of highest biodiversity value.</p> <p>Paragraph 3 links development to biodiversity strategies which will indicate the best biodiversity outcomes for all areas, including those outside of BOAs.</p> <p>Developments outside BOAs will be required to achieve net gains in biodiversity using those strategies.</p> <p>Policy P8/P9 covers important and sensitive habitats and species including on sites outside of BOAs.</p>
<p>4.66</p>	<p>Does GBC have designated sites for offsetting? If there are sites they should be named in the document. If there are no sites the policy should not cover offsetting.</p> <p>It would be better not to allow offsetting because the big developers will just do it rather than produce biodiverse developments.</p> <p>Developers should not simply by-pass the policies by making a payment into off-site provision which may not even be in Surrey, let alone Guildford.</p>	<p>The Council does not have sites for offsetting at the present time. The government's view is that offsetting sites do not necessarily need to be Council sites.</p> <p>The policy is consistent with the national approach set out in the Environment Bill where it allows for offsite offsetting. The government's impact assessment for the bill indicates that onsite biodiversity measures will be favoured by developers due to the lower cost, but that in many achieving the required gains onsite will not be possible. We are proposing to increase the gain from 10% to 20%, which means a greater proportion of gains will need to be offsite.</p>

		Offsite offsetting will not allow developers to bypass policies that protect important habitats and species. The policy has been written to lock in the principles of the mitigation hierarchy (which avoids harm as the first step), and the proposed national Biodiversity Net Gains approach also embeds this principle.
	It is essential that robust policies are designed to protect “existing” biodiversity and avoid the use of ‘planning conditions’ as mitigation the easement of planning applications and for biodiversity loss.	Noted. As a whole the policies are designed to protect existing biodiversity and deliver net gains.
	It is illogical to assume biodiversity can be either protected or enhanced around the large housing estates currently being planned. These sites should therefore be removed from the local plan. If not, the developments will be disastrous to the environment and biodiversity.	Under the proposed policies, new developments will lead to net gains for biodiversity. The Environment Bill sets a framework for achieving this.
	Do we have a financial dis-incentive for non-compliance [with the policy]? An annual or bi-annual check of each site perhaps? Detail is needed as to how the policy will be enforced. How do we police this? All developers want is money for buildings.	Where developments do not comply with Local Plan policies, decision makers may refuse planning permission taking account of other policy documents and material considerations. The council has the option of taking enforcement action where developments do not comply with permissions.
	Words in the policy such as “should” are not good enough. Please replace them with “Must”.	The words “must” and “required” have been used wherever it is considered justified to do so.

	<p>It is not just rare wildlife that matters – any open area can contribute to numbers of commoner species that are essential to environmental wellbeing and reversing the loss of invertebrates in general.</p>	<p>The policies as a whole promote biodiversity generally and do not only support rare species.</p>
	<p>Green roofs are good but solar panels (or other means of capturing solar energy) on roofs may be a better choice for climate change mitigation depending on the aspect.</p>	<p>The Council's climate change policies would support the use of roof-mounted solar panels. The policies are written to allow flexibility so that proposals can include the most appropriate use of roofs depending on local circumstances.</p>
	<p>As well as mitigating the development of adjacent land by screening etc. the operating times for businesses should be fairly restricted to shield wildlife from noise and dust in the atmosphere etc. Consultation on this issue from the Wildlife organisations should be sought</p>	<p>Planning applications are subject to public consultation and wildlife organisations frequently respond. Policy ID4 of the LPSS provides general protection for designated habitats and the proposed new policies add detail. Where restrictions on operations are necessary they can be considered at the planning application stage.</p>
	<p>A large scale map to show the exact boundaries of the BOAs will be needed.</p>	<p>This will be included in the policies map.</p>
	<p>Consideration should be given to the potential effects of noise or light generating development on international, national and locally designated sites of importance for biodiversity</p>	<p>Noise and light impacts are covered by other policies.</p>

Policy P7 Biodiversity net gain (incorporated into new Policy P6/P7 Biodiversity in New Developments in the LPDMP)		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		
	Agree	Noted
Environment Agency		
	We fully support the inclusion of policy P7 and particularly the commitment for 20% biodiversity net gain (BNG). We're really pleased to see the Council striving for a higher figure than the minimum figure proposed by Government and mandating BNG for developments not mandated by Government. We recommend including the wording '20% (or the standard minimum, whichever is greater) biodiversity net gain'. This will help to future proof your plan, in case the Government's requirements change.	This amendment has been made. The policy has been changed so that nationally exempted developments are no longer caught by local policy in order to align more closely with the national approach.
Surrey Nature Partnership		
	This policy is both welcome and is supported, and its justification aligns with SNP recommendation for Surrey's LPAs to adopt a minimum requirement for 20% BNG (ref. Recommendation for 20% minimum biodiversity net gain within Surrey - a Surrey Nature Partnership Position Statement (in draft)).	Noted.
4.63	Proposed amendment: "Local Plan policy ID4 currently supports the strategic aim of delivering BNG but <u>neither provides</u> any further clarification <u>nor sets</u> out a method by which gains should be measured."	The referenced text has not been used in the draft plan. If it is used in the relevant topic paper, the amendment will be applied.
Other organisations		
Surrey Wildlife Trust		

4.63	Proposed amendment: “Local Plan policy ID4 currently supports the strategic aim of delivering BNG but <u>neither provides</u> any further clarification <u>nor sets</u> out a method by which gains should be measured.”	The referenced text has not been used in the draft plan. If it is used in the relevant topic paper, the amendment will be applied.
Guildford Society		
	Despite the numbers quoted in the text, there must be some anxiety that P6 and P7 will inhibit house building in unexpected manner. There is some evidence that Brownfield sites with some environmental value are disadvantaged compared to greenfield sites. It would be useful to understand if the council has sense tested this policy on a number of major sites.	The plan is subject to full viability testing and developers can raise concerns about deliverability during the Regulation 19 Local plan consultation in order for the examiner to consider against the evidence. We have continued the national approach to biodiversity net gains on brownfield sites and clarified that where net gains are required due to the presence of a biodiversity feature included in paragraph 2, the net gain required is only for that feature.
Bridge End Farm		
	We object to the preferred approach to bio-diversity net gain as set out in bullet 1 of Policy P7 in the draft document. Whilst fully supporting the need to deliver biodiversity net gains as part of new development, to ensure that the policy is justified and positively prepared in line with the Governments Environment Bill we consider that the policy should be amended that development proposals should be required to demonstrate ‘a minimum 10% increase in biodiversity on or near development’.	This point is not agreed. The justification for a locally higher net gain requirement is set out in the supporting text of the Preferred Options document. The plan will be subject to viability testing in order to ensure it is deliverable and the examination will test whether the policy is justified.

Woodland Trust		
	<p>For previously developed sites, typically urban sites, where the existing level of biodiversity may be very low, we recommend adopting an Urban Greening Factor, based on the approach used in the new London Plan.</p>	<p>This option has not been taken forward because it would apply a requirement similar to biodiversity net gains to developments that are proposed to be exempt from biodiversity net gains and would therefore not be consistent with the emerging national approach.</p> <p>The plan includes policies on open space and biodiversity in new developments which will promote the greening of urban areas generally.</p>
	<p>Before seeking 'net gain' for biodiversity, planning policies should ensure that any proposed development minimises land take, and avoids damage to any existing high-quality habitats, including ancient woodland.</p>	<p>Designated habitat sites are protected by existing policy ID4 and by proposed new policy P8/P9. Proposed policies also provide protection for important habitats on undesignated sites.</p> <p>Both policies align with the mitigation hierarchy which requires avoidance of damage as the first step, and the national Biodiversity Net Gains programme also supports this approach.</p>
	<p>Appropriate site selection is essential to delivering biodiversity gain: any scheme that damages irreplaceable habitats such as ancient woodland, irrespective of any mitigation and compensation measures, cannot deliver net gain.</p>	<p>Noted. Policy P8/P9 protects irreplaceable habitats including Ancient Woodland.</p>
Weyside Urban Village		

	<p>It should be noted that the Defra Metric 2.0 (as specifically referenced in criterion (1) of the policy) takes account of certainty (or otherwise) of the possibility of delivering habitat types through habitat creation/enhancement and therefore a figure of 10% BNG, as measured by that metric, should already take account of uncertainty and will have adjusted habitat unit calculations accordingly. We would suggest that the figure and terminology in any approved Environment Bill be simply replicated in any future DM Policy.</p>	<p>The supporting text of the preferred option sets out the reasons for diverging from the emerging national approach to seek a 20% biodiversity net gain from new developments.</p>
	<p>The Policy 7 background suggests that the costs of BNG would push back to land value; this may be the case in time but as the policy comes through to adoption there may be sites for which an adopted policy at 20% squeezes the viability balance where the land deal is already in place.</p>	<p>The plan will be subject to a viability assessment and the NPPF allows viability to be reconsidered at the planning application stage if the circumstances provide a reason for doing so.</p>
	<p>The policy exempts previously developed (brownfield) land. We would note that brownfield land can have biodiversity value and support where the Policy proposes to cover this by clarifying that brownfield sites are exempted unless the previously developed sites support at least one protected or priority species population or habitat, or an assemblage of species with an otherwise demonstrably high biodiversity value. However we would suggest some form of spatial recognition is added as a large, predominantly brownfield site may include a small area of priority habitat that would, as currently worded, require the entire site to deliver BNG. Suggest consideration is given around an exemption/special consideration for brownfield sites that include small areas of priority habitat and therefore lose their 'exemption' but may require some form of remediation to address contamination issues given any site history. Some form of off-set of BNG costs balanced against the benefits of addressing contamination may be worth exploration.</p>	<p>A clarification has been added that where such features are present, a net gain for those features will be required, rather than for the whole site. We don't agree that remediation should be offset against biodiversity gain as this would not accord with the national approach, which makes it clear that BNG must be wholly additional to works that would otherwise be undertaken, like remediation to remove contamination. If remediation includes exceptional costs that can be shown to affect viability then that can be considered in the planning application process.</p>
<p>Send Parish Council</p>		

	<p>It is essential that robust policies are designed to protect “existing” biodiversity and avoid the use of ‘planning conditions’ as mitigation the easement of planning applications and for biodiversity loss.</p>	<p>Agreed. Policies are proposed that protect existing biodiversity and the policy incorporates the mitigation hierarchy, which prioritises avoidance of harm.</p>
<p>Homebuilders’ Federation</p>		
	<p>Whilst we have raised concerns with the Government regarding the level at which net gains might be set, we consider it essential that the percentage required in legislation is not varied by local authorities</p> <p>The Government have stated that 10% achieves a level of improvement which the Government consider to, on balance, strikes “the right balance between ambition, certainty in achieving environmental outcomes, and deliverability and costs for developers”. If the Government are confident that a 10% requirement will deliver genuine net gain, offset the impacts of development and ensure development continues to come forward the Council should not seek to require additional improvements to address the impact of other factors that have led to the decline in bio-diversity across Surrey.</p> <p>The Council have seemingly failed to grasp the reason as to why a consistent approach is being advocated by the Government. As mentioned earlier, by setting a national standard the development industry, landowners and resident understand what is expected and how it can delivered regardless of locality. Such a level playing field provides consistency in provision and will help to speed up the planning process. Diverging from this minimum requirement will inevitably create a conflict with legislation and create confusion and delay. As such we do not support the Councils preferred option.</p>	<p>The supporting text of the Preferred Options document sets out the reasons for diverging from the emerging national approach to seek a 20% biodiversity net gain from new developments.</p> <p>The government’s impact assessment indicates that there cannot be full certainty that genuine BNG will be achieved (rather than no net loss) if the minimum gain is set at 10 per cent. The Local Plan must seek genuine BNG in order to be consistent with the NPPF.</p> <p>The benefits of a level playing field across England are acknowledged. The supporting text sets out an explanation as to why these benefits are outweighed by benefits of seeking a 20% BNG.</p> <p>The Surrey Nature Partnership has adopted a target of 20% BNG for Surrey and it is anticipated that this standard will be implemented county-wide,</p>

		resulting in a level playing field across Surrey. A number of other authorities across England are seeking a 20% gain so implementing a 10% gain would not necessarily deliver a level playing field anyway.
	The Council also point to the limited additional cost of providing a 20% improvement, however this has not been tested by the Council. The costs set out in the impact assessment are very broad and may not reflect the local cost of meeting a much higher target – especially if offsetting is required. There is also likely to be a much higher amount of open space required to meet the higher standard reducing the developable area of any site and reducing the level development achieved on every site affected by this policy.	The plan will be subject to full viability testing. As a rural borough, Guildford benefits from a large amount of countryside which present opportunities for offsite BNG works.
West Clandon Parish Council		
Policy para 6)	This paragraph appears to allow development to escape the net gain obligation: “Where the applicant is unable to provide the gains on-site or off-site, the Council will seek a financial contribution to fund habitat measures if suitable land is available.” And if not? It cannot be intended that in such cases no payment will be required.	The Council cannot collect funds that are necessary to mitigate a development’s impacts if there is no mitigation scheme to be funded. As a rural borough, there are significant opportunities for habitat works that could provide BNG. Alongside this, the government envisages that developers who cannot achieve BNG on-site will be able to purchase credits from biodiversity providers including through a national scheme as a final option. As a result, our view is that it is very unlikely that developers will not be able to provide BNG onsite or fund it offsite.

		As a result, the supporting text has been rewritten to make it clear that it is unlikely that mitigation will not be available, and that the Council may seek a contribution to be used in a habitat bank if it isn't.
Blackwell Park		
	<p>Support the concept of biodiversity net gain and are aware that present national policy states that local plans should ensure net gains for biodiversity based on the development proposed (there is no target percentage). However, do not support the preferred option to set a minimum biodiversity net gain (BNG) of 20%.</p> <p>The government's response to the consultation on the BNG proposals states that "On balance, we believe requiring 10% gain strikes the right balance between ambition, certainty in achieving environmental outcomes, and deliverability and costs for developers. Legislation will therefore require development to achieve a 10% net gain for biodiversity". It is clear from this that the government has heard pleas for higher and lower targets through consultation but have concluded that 10% strikes the right balance and is proposing legislation at this level.</p>	<p>The supporting text of the Preferred Options document sets out the reasons for diverging from the emerging national approach to seek a 20% biodiversity net gain from new developments.</p> <p>The government's impact assessment indicates that there cannot be full certainty that genuine BNG will be achieved (rather than no net loss) if the minimum gain is set at 10 per cent. The Local Plan must seek genuine BNG in order to be consistent with the NPPF.</p>
	<p>The government's current position regarding setting a 10% BNG standard is still some distance into the future pending the passage of the Environment Bill, for which there is currently no clear timescale. The consultation included a methodology for setting the baseline and for calculating the net gains, and it is reasonable to consider that there is potential that these might also change before the legislation is passed. Hence there is no certainty as to the final level of net gain that will be required nor the method by which the baseline and any net gains will be calculated. Until these have been finalised by the government the local plan should not be seeking to fix on a preferred option for such a policy.</p>	<p>The NPPF requires Local Plans to seek measurable net gains from new development. The NPPF also asks for the planning system to be plan led and, as a result, it is important to set out an approach to net gains in policy rather than setting an approach on a case by case basis.</p>

		The national context may change between now and adoption of the plan. We will keep emerging national policy under review and take changes into account.
	Our clients are concerned that a 20% level is likely to have unwelcome impacts on development viability. Whilst there is provision for financial contributions where gain cannot be provided on or off site, large development sites already have a range of obligations they are expected to meet and contributions to provide, and having a BNG set at 20% may adversely affect viability to the extent that some sites may not come forward. It is noted that adoption of the standard will be subject to full plan viability testing, and our clients consider that if this policy option does proceed then it will be imperative that this testing is robustly carried out with input from the development industry.	Agreed. The plan will be subject to a viability assessment and we will ensure that the proposal for 20% net gains is tested taking into account local circumstances. The NPPF allows viability to be reconsidered at the planning application stage if the circumstances provide a reason for doing so.
Thames Water		
	Whilst supportive of the principle of biodiversity net gain, it is not considered that the drafting of the preferred option policy and the related supporting evidence currently adequately justify the Guildford local circumstances to support a 20% biodiversity net gain figure. The wording also does not clearly enough recognise that, aside from an exclusion relating to previously developed land, there may be other circumstances in which net gain is not deliverable, or not fully deliverable, nor does it provide any policy basis for such exceptions to be argued at Development Management Stage.	The plan will be subject to a viability assessment and we will ensure that the proposal for 20% net gains is tested taking into account local circumstances. The NPPF allows viability to be reconsidered at the planning application stage if the circumstances provide a reason for doing so. As a result, the addition of wording along the lines of “subject to viability” is not considered necessary.
Shalford Parish Council		

	Fully support the proposal for biodiversity net gain but it should remain in perpetuity and not just for 30 years.	The 30-year timeframe is the period proposed nationally.
	How will the base line be established and at what point will it be set? Will it be historic or just the time of application and how will diversity stripping ahead of submission for planning be prevented?	<p>The Defra Metric provides a method for establishing the baseline. The Environment Bill has not yet passed but it is likely the baseline will be set at the point the initial survey is carried out, prior to the planning application.</p> <p>The Bill currently sanctions the deliberate degradation of land prior to a planning application by allowing the baseline to be set at a level that reflects the land prior to degradation. The supporting text for the policy states that the council will apply any available punitive measures where deliberate degradation occurs.</p>
Portland Capital		
	Biodiversity net gain threshold should be set at 10 per cent as a minimum as identified in point 2 of the alternative options. The 10% net gain threshold is considered to be appropriate in the context that the increased provision (20%) may compromise wider residential delivery.	The supporting text sets out the reasons for diverging from the emerging national approach to seek a 20% biodiversity net gain from new developments.
	<p>If the 20% threshold is retained, Portland Capital request that 'subject to viability' is added to wording to avoid this policy requirement becoming prohibitive to delivery, particularly given recent housing under delivery. This reflects the NPPF:</p> <p>Para 67: "Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability</p>	The plan will be subject to a viability assessment and we will ensure that the proposal for 20% net gains is tested taking into account local circumstances.

	<p>assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.”</p> <p>Para 122 relates to achieving appropriate densities and states planning policies and decisions should support development that makes efficient use of land, taking into account (amongst other criteria) - local market conditions and viability.</p>	<p>The NPPF allows viability to be reconsidered at the planning application stage if the circumstances provide a reason for doing so. As a result, the addition of wording “subject to viability” is not considered necessary.</p>
Ripley Parish Council		
	<p>It should be borne in mind that "Surrey has lost significantly more of its biodiversity than the country as a whole" (para 4.74). A robust scheme should be in place to establish a baseline for biodiversity aspects of sites before development begins (para 4.61) so that measurement of Biodiversity Net Gain is clear.</p>	<p>The Defra Metric provides a method for establishing the baseline. The Environment Bill has not yet passed but it is likely the baseline will be set at the point the initial survey is carried out, prior to the planning application.</p>
Hallam Land Management		
	<p>Concerned that Policy P7 proposes to mandate in a Development Plan Policy a minimum net-gain of at least 20%, whereas, as presently drafted, the Environment Bill laid before parliament in January 2020 intends to formulate in to law a minimum of 10%. In effect, there would be Development Plan policy which attracts the weight of Section 38(6) of the [Planning and Compulsory Purchase] Act constantly at odds with another Statute.</p> <p>This runs entirely counter to the intention in the Environment Bill to provide more certainty and simplicity for developers in the first place. A policy requirement framed in these terms is simply inoperable. The Council’s approach should align with the relevant percentage that is embedded in the Act.</p> <p>The extent to which any individual development proposal achieves a greater percentage of biodiversity gain would be a material benefit to be weighed in the overall decision-making balance.</p>	<p>The supporting text sets out the reasons for diverging from the emerging national approach to seek a 20% biodiversity net gain from new developments.</p> <p>It is not agreed that the policy would place the Planning and Compulsory Purchase Act at odds with the Environment Bill as the latter sets a net gain of “at least” 10% (i.e. it does not cap the gain). A minimum net gain of 20% is in accordance with this requirement.</p>

		The Surrey Nature Partnership has adopted 20% as the recommended level for Surrey LPAs and it is therefore anticipated that adopting the standard will result in a simpler approach across Surrey.
Martin Grant Homes		
	<p>10% net gain has been identified as a potential future national requirement that would be applied to all new development. We do not accept that GBC's position is sufficiently unique to justify a requirement greater than the proposed national standard of 10% (i.e. GBC's proposed 20%) within local planning policy.</p> <p>The current requirement set out in national policy is for a net gain. GBC's policy should therefore require a BNG as a minimum, in accordance with current national guidance, unless any new national policy or legislation sets a nationally prescribed standard.</p>	The supporting text sets out the reasons for diverging from the emerging national approach to seek a 20% biodiversity net gain from new developments. We do not agree that local circumstances are not sufficiently unique.
	We do not accept with the comment made in paragraph 4.74 that an increased requirement from 10% to 20% BNG would not significantly affect the costs/viability for new development. The pressure on available space within the Borough is reflected in land prices, which will inevitably have a significant bearing on offset costs.	<p>The plan will be subject to a viability assessment and we will ensure that the proposal for 20% net gains is tested taking into account local circumstances.</p> <p>The NPPF allows viability to be reconsidered at the planning application stage if the circumstances provide a reason for doing so. As a result, the addition of wording "subject to viability" is not considered necessary.</p>
	We consider the policy should clarify the mechanism through which 'offsetting' would be delivered, where this is required. To be effective, it is essential that GBC (or a third party appointed by GBC) provides the required delivery of this policy, to which developers can contribute (e.g. through Section 106 Agreements).	The mechanism for offsetting would be that set nationally. The indication at present is that there

		will be a national biodiversity credit scheme to be available as a backstop where local credits are not available. As a rural borough, there are significant opportunities for offsetting locally.
	We note that estimates of the likely cost impacts on developers for achieving a 10% BNG are referenced in paragraph 4.70-4.73 of the consultation document. However, these figures are estimates, are uncertain and have not been tested. As such, we do not consider it appropriate that, in the event financial contributions are sought towards 'off-setting', these are calculated on the basis of these estimates alone. Instead, any contributions sought should be based on robust evidence. Policy P7 part 6) should therefore set out that any financial contributions sought by the Council to fund habitat measures will be fully evidenced and justified.	It is agreed that financial contributions must be justified. All planning contributions must meet this test. We have amended the policy to refer to a "justified and proportionate financial contribution".
West Horsley Parish Council		
	Agree. This policy needs to be really strong, e.g. 4a) states avoiding impacts on biodiversity as far as possible feels very woolly and open to avoidance and non-delivery.	The mitigation hierarchy has been removed to the supporting text. The phrase "as far as possible" has been removed as this is inherent in the hierarchy.
	Reference needed to Neighbourhood Plans.	Neighbourhood Plans are part of the Development Plan, carry their own weight and sit alongside the Local Plan. The Development Plan must be read as a whole and appropriate weight given to its component parts. Reference to Neighbourhood Plans in the Local Plan would not alter the

		weight given to Neighbourhood Plans.
Ockham Parish Council		
Policy para. 2)	Biodiversity net gain should be required on all sites with no exceptions	The national approach includes exceptions for certain types of development. We do not think it is justified to remove all the exemptions.
Policy para. 5)	The new habitats delivered should be secured and maintained in perpetuity	The 30 year timeframe is consistent with the national approach.
Policy para. 6)	If an applicant is unable to provide gains on site or off site then the site is almost certainly inappropriate for the suggested purpose and the application should be refused.	Where a development cannot provide on-site gains or fund gains provided off-site by a third party, the Council will seek to provide gains through a financial contribution. The government's impact assessment and the emerging national approach for biodiversity credits indicate that it will be very unlikely that a development cannot secure gains onsite or offsite and that the use of financial contributions is likely to be a last resort. In the unlikely event that a financial contribution is needed, and where the council is able to provide gains offsite, it would not be reasonable to refuse planning permission on the basis of biodiversity.

Taylor Wimpey		
Policy para 1)	TW believe that GBC should avoid specifying a version of the metric within the policy wording as this will quickly become out of date.	Agreed. The reference has been removed and the supporting text states that whatever metric is in use nationally will apply.
Policy para 1)	<p>GBC should also seek to ensure the policy is justified and positively prepared by being in line with the National Guidance of 10% net gain as a minimum. On this basis, TW object to this policy and suggest that the wording is changed to the following:</p> <p>“1) Major developments are required to follow the latest version of Defra’s net gain calculation methodology ‘Defra Biodiversity Metric’ and submit a completed spreadsheet with the planning application”</p> <p>OR</p> <p>“1) Net gain means a gain of at least 10 per cent. Major developments are required to follow the latest version of Defra’s net gain calculation methodology ‘Defra Biodiversity Metric’ and submit a completed spreadsheet with the planning application.</p> <p>The text “net gain means a minimum gain of 20%” is not justified (as per the NPPF (2019)) as the National standard is 10%. There is no evidence to substantiate a requirement for a specific elevated provision.</p>	<p>The supporting text sets out the reasons for diverging from the emerging national approach to seek a 20% biodiversity net gain from new developments.</p> <p>We do not agree that there is no evidence to substantiate a requirement higher than the proposed national requirement. Evidence has been set out in the supporting text in the Preferred Options document.</p> <p>The standard proposed in the Environment Bill is “at least” 10 percent, which the policy conforms with.</p>
Policy para 1)	<p>Upon publishing the metric calculation tool, Defra and Natural England made it clear that it was intended to be used as a tool to inform discussions with the LPA, not replace them. Indeed, the User Guide for Version 2.0 (the most current at the time of writing) says that “The metric uses habitat categories as a proxy for biodiversity. Although this is rational, it is an oversimplification of the real world (...) the metric and its outputs should therefore be interpreted, alongside ecological expertise and common sense, as an element of the evidence that informs plans and decisions. The metric is not a total solution to biodiversity decisions”.</p> <p>The User Guide also acknowledges that “Protected and locally important species’ needs are not considered through the metric”. This could apply, for example, to features such as reptile hibernacula or bat boxes designed for species that have been recorded in the area.</p> <p>Therefore, specifying a percentage figure above the National minimum for net gain removes this nuance and encourages an overly simplistic and unhelpful focus on the ‘bottom line’, as</p>	<p>Protected and locally important species’ needs are considered through preferred options P6, P8 and P9 (now policies P6/P7 and P8/P9). These policies reference existing and emerging local strategies. As a result net gains will be steered towards these locally important habitats and species.</p> <p>Alongside this, the Environment Bill proposes Nature Recovery</p>

	opposed to designing meaningful, locally appropriate net gains that reflect both the ecological interest and potential of a site and the wider environment within which it is located.	Strategies that will indicate the species and habitats most in need of support and it is proposed that measures that address these strategies will receive greater value in the metric, again steering net gains towards supporting these locally important species and habitats.
Policy para 1)	Introducing 20% as a minimum could be an onerous requirement for many developers, and it therefore has the potential to jeopardise the delivery of housing on allocated sites under the Part 1 Plan. At the time of adoption of this Plan, there was no specific requirement for net gain, and therefore the Plan and its allocations were found sound on the basis that allocations would need to follow National standards on this matter.	The plan will be subject to a viability assessment and we will ensure that the proposal for 20% net gains is tested taking into account local circumstances. The NPPF allows viability to be reconsidered at the planning application stage if the circumstances provide a reason for doing so.
	The policy should therefore specify “at least 10%” or “more than 10%” (to demonstrate the ambition to go above National policy but at a level that is still viable and deliverable for developers), or reference to a percentage figure should be removed altogether and instead state that developments should be guided by National standards.	The Environment Bill specifies a net gain of “at least” 10%. Stating this in policy would not go beyond national policy.
Policy para. 5)	Suggest the following changes in order to improve accuracy and clarity: 5) Requires new habitats contributing towards the achievement of biodiversity net gain to be secured and maintained for at least 30 years.	This amendment has been made.
Policy para. 6)	Suggest the following changes: 6) Where the applicant is unable to provide the gains on-site, the potential for off-site provision should be explored, including the potential for the Council to accept an appropriate financial contribution to fund biodiversity gain.	The achievement of net gains is a requirement in both the proposed policy and the national approach and the use of off-site measures where they cannot be achieved onsite is embedded in the national approach. A

	<p>The term 'will' is contradictory to the term 'if'. The policy should only be definitive about seeking a financial contribution if there is a means to invest that contribution. Further, it should be made clear that the latter part of the sentence is referring to off-site provision.</p>	<p>requirement to “explore” off-site measures would not be appropriate as gains must be achieved off-site if they cannot be achieved onsite (not simply the possibility explored).</p> <p>The paragraph has been amended to remove the words “if suitable land is available” and to make it clear off-site measures includes funding (e.g. the purchase of biodiversity credits) rather than provision. The supporting text has been rewritten to make it clear that it is unlikely that mitigation will not be available, and that the Council may seek a contribution to be used in a habitat bank if it isn't.</p>
Burpham Neighbourhood Forum		
	<p>Too many acronyms are used in the document. To make it more user friendly each policy under the title should include a list of acronyms.</p>	<p>A glossary has been included in the plan.</p>
Para 4.73	<p>We are unsure on what these costing are based and should be properly referenced.</p>	<p>The costings come from the Government's Impact Assessment - see paragraph 4.70 in the Preferred Options document. The report is linked in a footnote in the paragraph.</p>
Para 4.76	<p>Concerns that self build proposals would not have sufficient economies of scale to make a meaningful contribution to BNG without jeopardising the development. A national house builder developing a strategic site would have considerable opportunity to master plan BNG as part of the overall scheme. An Individual building their own home would not necessarily have sufficient</p>	<p>The policy has been amended so that any nationally BNG exempt developments are also exempted</p>

	space or budget to accommodate this, which is one of the reasons that self build homes are exempt from CIL.	by the policy (including self builds).
Other respondents		
Policy para 2)	Policy states previously developed sites can support “high biodiversity value”. In practice, the bar for determining this may be set too high. Using species present as the trigger will ignore a site’s value as a corridor and the biodiversity value it adds to adjacent open space in terms of the overall area available to wildlife.	This point is noted. However, in this instance our view is that we should maintain consistency with the national approach.
Policy para 3)	[Regarding “proposals for net gain should be delivered in a manner that is consistent with policies P6 and ID4”]. Replace “should” with “must”	Should has been replaced with “required” in the wording of the draft policy.
Policy para 4)	a) & b) “as far as possible” will be an area of contention. It should refer to “adverse impacts”. The emphasis should be on making it clear that developments that have an adverse impact on biodiversity will be refused.	The mitigation hierarchy has been moved to the supporting text. “As far as possible” has been removed. Stage one refer to “adverse impacts”. Under the policy, all qualifying developments are required to result in a net gain for biodiversity, however, there may be instances where development that would have an adverse impact should go ahead, e.g. because it delivers benefits that outweigh the impacts on biodiversity.
Policy para 5)	The 30 year time span for new habitats is too short. Such habitats should remain undeveloped, and be managed appropriately (maintained for biodiversity), in perpetuity.	The 30 year timeframe is consistent with the national approach.
Policy para 6)	What if suitable land is not available?	The reference has been removed.

<p>Policy para 7)</p>	<p>Concern over how recipients of finance for biodiversity offsetting will be subject to compliance with the objective.</p>	<p>Biodiversity sites used for offsetting will be governed by national legislation (through the forthcoming Environment Act). Additionally, if planning decision makers are of the view that a net gain scheme would not deliver the required gains, any planning applications that relies on that scheme could be refused.</p>
	<p>The most effective strategy would be to reverse the decisions to develop the Green Belt sites at Blackwell Farm, Gosden Hill Farm and Wisley Airfield. Each of these developments, apart from causing irreversible damage to biodiversity, will require substantial new investments in infrastructure, will increase traffic and pollution, and will cause extra demands on already overstretched utilities and resources.</p> <p>It is impossible to have any gain in biodiversity under the current plan, as it will destroy much of the existing biodiversity.</p>	<p>Under the proposed policy, development of LPSS sites will lead to an improvement in biodiversity.</p> <p>The LPSS was found sound by an independent planning inspector. One of the tests of soundness is whether it is sustainable. Sustainability as defined in the NPPF comprises the balancing of environmental, social and economic considerations. The policies in the LPDMP will apply to the growth allocated in the LPSS. National policy requires that plans are reviewed at least every five years. If the LPSS is reviewed and found to require updating then a new plan would need to be prepared in light of the requirements of national policy and guidance.</p>

	<p>It is essential that policy protects “existing” biodiversity and avoids the use of ‘planning conditions’ as mitigation for the easement of planning applications and for biodiversity loss.</p>	<p>The policy implements the mitigation hierarchy which will protect existing biodiversity. The biodiversity policies include protections for important biodiversity features.</p>
	<p>Detail is needed as to how the policy/net gains would be enforced.</p>	<p>Where developments are not delivered in accordance with planning permission the Council can take enforcement action. The Environment Bill will make net gains a legal duty for qualifying development.</p>
	<p>Despite the numbers quoted in the text, there must be some anxiety that P6 and P7 will inhibit house building.</p>	<p>The plan will be subject to viability testing to establish any impacts on house building.</p>

DRAFT

Policy P8 Woodland, trees, hedgerows and irreplaceable habitats (incorporated into new Policy P8/P9 Protecting Important Habitats and Species in the LPDMP)		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey County Council		
	The preferred option refers to woodlands and hedgerows, but could also usefully include shaws as referred to in the Landscape Character Assessment for Surrey.	The name of the policy has been changed following the merging of preferred options P8 and P9 and no longer refers to woodlands in the title so a clarification that the policy also covers shaws is not necessary. The policy protects specific types of woodland (ancient woodland and ancient wood pasture), which would include shaws where they meet the criteria. A reference to shaws has been included in the introduction.
	The Biodiversity Working Group of the Surrey Nature Partnership has produced draft guidance which may include useful information. This is attached to our covering email in response to this consultation. The sign off for this draft guidance has been delayed due to issues relating to COVID 19.	The guidance has now been published on the Surrey Nature Partnership website at https://surreynaturepartnership.org.uk/our-work/ . The document provides guidance on assessing whether habitats should be considered irreplaceable. This guidance has been referenced in the definitions under policy P8/P9.
Environment Agency		
	The list of irreplaceable habitats should also include rivers where they have suffered from little historic modification.	'Stretches of river that have had little historic modification' has been added to the list of irreplaceable habitats.
	This policy should include the requirement for a long term landscape and ecological management plan to be submitted to and agreed in writing by the Council, along with details of adequate financial provision, whether this is to be maintained by the developer/management company or given as a commuted sum to the	Appropriate conditions will be applied to ensure the long term management of biodiversity and open spaces, where this is appropriate. A clause has been added to policy P6/P7 covering this matter.

	Council. This should include details of how these habitats will be monitored and managed to ensure their continued protection and enhancement.	
Historic England		
	Agree. Woodlands, parkland and hedges are often significant components of historic landscape character.	Noted.
Surrey Nature Partnership		
4.81	Welcome and supported. Suggested amendment "...However, the NPPF doesn't contain an exhaustive list of habitats that should be considered irreplaceable. Other <u>examples of</u> habitats that meet the definition that are present in Surrey include..."	This text was included in the Issues and Options document to help explain the preferred option but has not been carried over to the proposed submission version of the policy. If the text is used in a topic paper, this amendment will be applied.
Other organisations		
Martin Grant Homes		
	We do not consider the inclusion of 'important' hedgerows on the list of irreplaceable habitats is justified. In addition, we consider that the inclusion is not ecologically justifiable. 'Irreplaceable habitats' are defined in the National Planning Policy Framework (NPPF), and reproduced in Paragraph 4.81 of the consultation document, as 'habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed'. This is not the case for hedgerows; creation of 'native species-rich hedgerow' is classified as having 'medium difficulty' under the Defra Biodiversity Metric 2.0. Inclusion of hedgerows as an irreplaceable habitat would have a disproportionate impact on the delivery and viability of development. We fully accept that hedgerows should be retained and protected within development where possible, and that the most ecologically important hedgerows should be prioritised. However, in many cases the removal of some 'important' hedgerows/sections cannot be avoided. Under Policy P8 as proposed, this would require the refusal	We agree that not all hedgerows meet the definition of irreplaceable habitat and that species rich hedgerows can be created. The intention is not to designate all hedgerows as irreplaceable. The policy refers to "Important hedgerows", which means specific hedgerows as defined nationally: https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management It is acknowledged that some of the criteria that identifies an "important hedgerow" (such as whether the hedgerow marks the boundary of an estate or manor) do not align with the NPPF definition of what constitutes an irreplaceable habitat. As a result, we have amended the policy so that it only protects those important hedgerows that are identified on the basis of the biodiversity criteria in the list of features under 'Importance' in the link above

	<p>of a significant proportion of applications (including those for allocated sites) as it is unlikely that 'wholly exceptional reasons' could be demonstrated.</p> <p>Use of the Defra Biodiversity Metric 2.0 hedgerow calculation tool, together with the delivery of effective on-site habitat creation (i.e. in accordance with Policies P6 and P7), provides sufficient safeguard for hedgerow habitats; inclusion of 'important' hedgerows as an 'irreplaceable habitat' is therefore not required.</p>	<p>(excluding the woody species criteria). These criteria are that the hedgerow contains: protected species, endangered, vulnerable or rare species. Where a hedgerow does contain these, and also meets the definition of "important hedgerow" under the hedgerow regulations, the assemblage of species is such that replacing the hedgerow would be technically difficult or take a very significant time, which accords with the NPPF definition for irreplaceable habitat.</p> <p>"Woody species" has been excluded as a qualifying criteria as it is agreed that it is possible to create such hedgerows through planting so does not meet the definition of irreplaceable.</p> <p>The supporting text sets out the criteria that will be applied to judge whether a hedgerow is considered irreplaceable and a justification for why qualifying hedgerows should be considered irreplaceable.</p>
Surrey Wildlife Trust		
4.81	<p>Welcome and supported.</p> <p>Suggested amendment "...However, the NPPF doesn't contain an exhaustive list of habitats that should be considered irreplaceable. Other <u>examples of</u> habitats that meet the definition that are present in Surrey include..."</p>	<p>This text was included in the Issues and Options document to help explain the preferred option but has not been carried over to the proposed submission version of the policy. If the text is used in a topic paper, this amendment will be applied.</p>
Send Parish Council		
	<p>The maintaining of existing trees/hedgerows surrounding developments / strategic sites can provide aesthetic screening of new developments which help make it a little more acceptable to existing communities. This should be added to this policy.</p>	<p>This is a design matter. The plan contains policies that cover issues such as boundary treatments and landscaping.</p>
Woodland Trust		

Policy para 3)	Where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the compensation measures must be of a scale and quality commensurate with loss of irreplaceable habitat. Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.	The policy treats ancient woodland as an irreplaceable habitat with commensurate compensation measures. Where impacts on ancient woodland would occur (subject to the test in paragraph 1), appropriate and proportionate compensation measures will be required. The level of compensation will be set in consultation with Natural England.
Policy para 4b)	Requirement for a buffer should be strengthened. While recognising that 15m is the minimum buffer for ancient woodland set by Natural England, we would recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and adjacent ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.	The minimum 15m proposed buffer is consistent with Natural England's standing advice. Natural England and the Woodland Commission previously introduced a 50m buffer, but this was withdrawn. Given this situation, we do not believe a 50m buffer can be included in the policy. The policy calls for a buffer of at least 15 metres, and for the root structure and understory of ancient woodland to be incorporated in undeveloped land within the public realm, which will allow for a larger buffer if one is necessary to protect root structures.
	Where tree removal is unavoidable, we recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.	Our view is that this non site-specific requirement would be too prescriptive and could be detrimental to other types of habitat. Policy P6/P7 ensures that biodiversity works (including biodiversity net gain works) target the most locally valuable habitats and species, which may not always be arboreal habitat. A rigid requirement to increase the amount of trees on-site following removal could undermine policy by restricting the amount of land available for other more valuable habitats. It could also result in direct harm to existing valuable habitats as they are replaced with trees.
	We would further encourage the specification where possible of UK sourced and grown tree stock for new planting, in line with policy P6 above, to support biodiversity and resilience.	Policy P6/P7 places a requirement for native and UK sourced planting.
Normandy Action Group		

Policy para 4b)	<p>The 15 metre buffer is wholly inadequate. The policy makes no attempt to recognise the issue of wildlife disturbance and displacement during construction phase or post-construction. Much of the Ancient Woodland stands in the west of the Borough support wildlife populations that benefit from isolation from human activity. Any development will drive away such populations and subsequent human occupation of surrounding developed land with associated activity, noise, air pollution and pet population will make it impossible for their return. The concept of 'net gain' cannot address such species dislocation. Proposed changes: Replace "minimum 15 metres" with "minimum 50 metres".</p>	<p>The minimum 15m proposed buffer is consistent with Natural England's standing advice. Natural England and the Woodland Commission previously introduced a 50m buffer, but this was withdrawn. Given this situation, we do not believe a 50m buffer can be included in the policy.</p> <p>The policy calls for a buffer of at least 15 metres, and for the root structure and understory of ancient woodland to be incorporated in undeveloped land within the public realm, which will allow for a larger buffer if one is necessary to protect root structures.</p>
Policy para 4c)	Remove "road" as a separation option	Roads can provide a suitable delineation between private space and ancient woodland on public space in order to prevent encroachment. However, the policy has been amended to refer to lightly trafficked road, as a primary or busy route would not be an appropriate buffer.
Policy para 5)	Remove "wherever possible"	This amendment has been made.
Weyside Urban Village		
Policy para 1)	<p>The Policy includes definitions of irreplaceable habitats and we would suggest GBC check how those definitions align with the "irreplaceable" habitats included in the Defra Metric 2.0 to make sure that Policy 8 and Policy 7 align. Replanted ancient woodlands could also be listed. The habitat definitions in Defra Metric 2.0 align to UK HAB.</p> <p>For example "wood pasture and parkland" is identified of high value in the Defra Metric but not "irreplaceable". Those habitats considered as "irreplaceable" under the Defra Metric are excluded from the Metric Calculations as off-set is not considered appropriate for such habitat types. Policy 8 appears well-meaning but perhaps spreads the net too wide and would be better to align to the Defra Metric referenced in</p>	<p>Replanted ancient woodland has been added to the list.</p> <p>The point about wood pasture and parkland is acknowledged. The wording has been amended to refer clearly to <u>ancient</u> wood pasture and <u>historic</u> parkland only. The policy treats ancient wood pasture and historic parkland as irreplaceable habitats and is not intended to apply to all wood pastures and parklands. The supporting text sets out the defining characteristics of these habitats. The length of time taken to create these habitats means that they meet the test of being irreplaceable in the NPPF.</p>

	Policy 7 and confirm those habitats that truly are irreplaceable against those that are of very high or high value.	
Policy para 4b)	The policy requires a minimum 15m buffer for ancient woodland/veteran trees. This could be better defined by including reference to creating an appropriate buffer given the existing nature, health and setting of the ancient woodland and the nature and area of proposed development.	The policy requires an appropriate buffer of at least 15m do would not be limited to only 15m. Supporting text has been added that sets out that this should take into account the existing, nature, health and setting.
Guildford Residents' Association		
	It is likely that the definition of what is 'irreplaceable' will be significant. Does Surrey Nature Partnership hold a list of such habitats in the borough? Clearly, SNP does identify SNCIs and other important sites, but at what stage are they identified as irreplaceable?	The SyNP has produced guidance on assessing the irreplaceability of habitats: https://surreynaturepartnership.files.wordpress.com/2020/08/irreplaceable-habitats-guidance-for-surrey_final_aug2020.pdf However, it has not produced a definitive list. The policy provides for future documents to be published.
Compton Parish Council		
Policy para 4)	The buffer zone around ancient woodland should be increased to 50m in line with recommendations by the Woodland Trust.	The minimum 15m proposed buffer is consistent with Natural England's standing advice. Natural England and the Woodland Commission previously introduced a 50m buffer, but this was withdrawn. Given this situation, we do not believe a 50m buffer can be considered reasonable or justified. The policy calls for a buffer of at least 15 metres, and for the root structure and understory of ancient woodland to be incorporated in undeveloped land within the public realm, which will allow for a larger buffer if one is necessary to protect root structures.
Policy para 4)	Roads should not be used to separate ancient woodland from housing development. Building a road adjacent to ancient woodland could	Roads can provide a suitable delineation between private space and ancient woodland on public space in order to prevent encroachment. However, the policy has been

	have a negative impact on this sensitive environment in terms of noise, air pollution and wildlife.	amended to refer to lightly trafficked road as a primary or busy route would not be an appropriate buffer.
Policy para 5)	Point 5 is too weak and the words “Site design is expected to incorporate significant trees plus their root structures and understory within the public realm” should be changed to “Site design is required to incorporate significant trees ...).	The word ‘expect’ is used here to indicate that there may be circumstances where it is not possible to keep significant trees in the public realm. Where proposals would incorporate significant trees on private land, an explanation would be needed as to why this is necessary. Trees on private land may be protected from harm by the landowner through the use of a Tree Protection order.
National Trust		
Policy para 2)	It is important that the “wholly exceptional reasons” suggested in the policy are identified as the Trust would suggest that this exception may not otherwise comply with the requirements of para 175 a) of the NPPF which is more absolute in its form.	The policy aligns with NPPF para. 175 c where it states “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”. The NPPF provides an example in footnote 58 but does not provide an exhaustive list and we do not think it is necessary to provide a list in the Local Plan.
	It is also important that in seeking to protect these areas that their appropriate management is considered as part of any development proposals and the Trust would suggest that a link is made between this policy and any BNG policy to ensure that these irreplaceable features are protected and enhanced for the long term.	We clarified with the respondent that this comment referred to the enhancement of existing habitat to provide biodiversity net gains, and the long-term maintenance of those habitats. The plan is read as a whole and Policy P6/P7 ensures that the implementation of biodiversity net gains does not allow the destruction of valuable habitats through the provision of compensation. Policies P6/P7 and P8/P9 incorporate this principle through reference to the mitigation hierarchy. Under the national approach, biodiversity net gains must be secured for at least 30 years.

Policy para 4)	The Trust would suggest that wording is added to ensure that any delineation will in itself not do harm and support the conservation of that area.	The plan is read as a whole and design and conservation policies will prevent harmful development.
Ripley Parish Council		
4.91	It is important that sites due for development are inspected ahead of the design stage by an arboriculturalist to identify trees which should have TPO status in all areas.	Where someone believes that a significant tree is at risk due to development, they can alert the Council and the tree can be reviewed for TPO status by the Council's tree officer. The need for TPOs on proposed development sites is also considered by development management officers during the planning application stage.
4.97	The planting of hedgerow within new development sites should be positively encouraged.	The national Biodiversity Net Gains approach places a high value on hedgerows and this will encourage the planting of hedgerows on development sites and on other land in order to provide biodiversity credits for developers. Where hedgerows are a priority habitat within a BOA, policy P6/P7 would encourage provision.
Effingham Parish Council		
	Certain areas should be prevented by policy from taking out hedges (especially ancient hedges) and replacing them with fences or brick walls, both of the latter can inhibit the movement of wildlife.	The policy protects ancient hedgerows that also have biodiverse features as irreplaceable habitats in line with the NPPF. Hedgerows that qualify as 'important' under national legislation are protected nationally. Policy P6 requires development to be permeable for wildlife.
	The supporting text should explain which are important hedgerows under the 1997 Regulations.	A definition section has been added under the policy which explains which hedgerows qualify as 'important' and which 'important' hedgerows have high biodiversity value and are protected by the policy.

	<p>The policy should explicitly mention the preservation of long-established hedgerows in urban and village environments, both as habitat and to improve the local environment. These may not meet the criteria of the 1997 regulations but are important for greening the built environment.</p>	<p>This policy is focused on biodiversity so protects biodiverse hedgerows. The plan contains design policies that cover issues such as boundary treatments and landscaping.</p> <p>Policy P6/P7 refers to the mitigation hierarchy which identifies avoidance of harm to biodiversity as the first step. As a result, development following this principle will avoid removing hedgerows. Alongside this, the Biodiversity Net Gain approach will discourage the loss of biodiverse features such as hedgerows as this will increase the amount of biodiversity that has to be created or enhanced in compensation.</p> <p>However, there may be instances where hedgerows that do not benefit from protection through law or policy have to be removed in order for a development to be delivered, where the benefits of doing so would outweigh the harm caused by the loss of the hedgerow.</p>
<p>East Horsley Parish Council</p>		
	<p>Since parts of Guildford borough have adopted Neighbourhood Plans containing policies relating to trees and hedgerows which form part of their Local Development Plan, reference to their applicability would also be appropriate within this policy.</p>	<p>Neighbourhood Plans are development plan documents in their own right and do not need policy support from the Local Plan.</p>
<p>West Horsley Parish Council</p>		
<p>Policy para 4b)</p>	<p>The buffer zone of 15m seems very low.</p>	<p>The policy sets a requirement for an appropriate buffer at a minimum of 15 metres, in accordance with Natural England standing advice. Where this would not be sufficient, the policy would require a wider buffer.</p>
	<p>There should be clear guidance if there is the presence of OPM.</p>	<p>OPM is largely not a planning matter as it dealt with through legislation other than planning legislation. It may be a planning matter where it falls on or around a development site and would present a risk to future occupiers of a development. In these cases it will need to</p>

		be eradicated in order to make the development acceptable in health terms. Policy P6 sets a requirement for the control or eradication of invasive species like OPM.
Taylor Wimpey		
	This preferred option policy is essentially about irreplaceable habitats, therefore, TW suggest that the policy title should be worded as such so that the intention is clear, with 'woodland, trees, hedgerows' removed from the title.	This point is noted. Policies P8 and P9 have been merged and the resulting policy covers more than irreplaceable habitats and more than woodland trees and hedgerows so has been renamed.
Policy para 2)	TW are concerned about the inclusion of "important hedgerows" as defined under the Hedgerow Regulations 1997 as an irreplaceable habitat. To be classified as "important" under these Regulations, a hedgerow only has to meet one of several criteria, one of which is that it contains at least 7 woody species. This means that in theory a recently planted hedge of low ecological and landscape value could qualify on this criterion and thus trigger the strict requirements applied to irreplaceable habitats as set out in part 2) of Policy P8. Ancient hedgerows should remain covered.	This point is agreed. The policy has been amended so that only important hedgerows that qualify for their biodiversity are covered, excluding the woody species criteria. These criteria are that the hedgerow contains: protected species, endangered, vulnerable or rare species. Where a hedgerow does contain these, and also meets the definition of "important hedgerow" under the hedgerow regulations, the assemblage of species is such that replacing the hedgerow would be technically difficult or take a very significant time, which accords with the NPPF definition for irreplaceable habitats. The supporting text sets out information about which hedgerows are covered.
Policy para 2)	TW suggest that the word "unequivocal" is removed as it is superfluous. Credible evidence is reasonable and deliverable, making reference to this term unnecessary. Also this would be a matter of judgement, so it is unrealistic to suggest that evidence could be "unequivocal".	This point is agreed. 'Unequivocal and credible' has been replaced with 'robust', a more commonly used planning term.
Policy para 4c)	Requiring physical features adjacent to an ancient woodland undermines other biodiversity policies, such as those relating to habitat connectivity. If the intention is to ensure that no housing is adjacent to a woodland, due to issues with encroachment, access, fly tipping, and so on, then the policy should state as much. Otherwise,	Under the policy, a buffer will be placed around ancient woodland preventing houses being located next to it. This not only protects the woodland, but also protects developments from impacts such as trees overhanging gardens, blocking light or creating leaf litter, which can lead

	<p>the text “delineated by a physical feature such as a cycle lane, path or road” should be removed.</p>	<p>to calls for works to the trees, or lead people to undertake works themselves.</p> <p>Impacts on Ancient Woodland may come from encroachment from nearby houses, the creation of informal access routes, the dumping of garden waste and invasive plant cuttings in the woodland, and from domestic cats wandering into the woodland from nearby houses. A clear delineation between the woodland and the development will create a stronger buffer and improve surveillance for activities like waste dumping and woodland clearance.</p> <p>Most species (e.g. woodland birds) will be able to cross a low use track or access road. The more sensitive wildlife (e.g. cuckoos) will stay behind the 15m buffer and avoid the areas near the housing or paths. The policy includes measures to reduce fragmentation through the provision of green linkages. As a result, our view is that the benefits of delineation outweigh the possible disbenefits in terms of habitat fragmentation.</p> <p>The policy has been amended to refer to lightly trafficked roads as it is acknowledged that busy roads could lead to fragmentation.</p>
<p>Burpham Neighbourhood Forum</p>		
<p>Para 4.93</p>	<p>[Proposal not to continue having a Tree Protection Order policy] We disagree with the removal of a specific tree Policy. This is because not all trees are covered with blanket orders. TPO’s double locks the principle Ancient wood pasture and historic parkland.</p>	<p>The point about double locking is noted. However, in this case creating planning policy for TPO trees would not have an impact. TPOs are shown on planning information maps and the existence of TPO trees will be clear both to those preparing proposals and to decision makers at the planning application stage.</p>
<p>Para 4.99</p>	<p>‘Important’ [hedgerow] in this context needs clear definition, as does the procedure for assessing this matter.</p>	<p>A definition has been added to the supporting text which sets out the criteria. It is not considered necessary to set out a procedure for assessing it beyond the relevant criteria as there are established methodologies for ecological surveys.</p>

Policy para 4a)	The wording of subsection 'a)' needs tightening with "should" being replaced with "MUST".	Agreed. The policy has been reworded so a BS5837 Survey is a requirement.
Other respondents		
Policy para 1)	The list of irreplaceable habitats should include heathland as well as wet heathland.	Heathland has been added to the list.
Policy para 2)	<p>Detail is needed as to what would constitute the "wholly exceptional reasons and the exceptional benefits of the development proposal" that would "outweigh the loss of the habitats" and what would be considered as "unequivocal and credible evidence" to prove this. In particular, it is vital that the evidence provided is independently produced and while relevant research may be paid for by developers, they should not have any input in the awarding of contracts to carry out the research.</p> <p>Is the achievement of national building targets an exceptional benefit that outweighs?</p> <p>The reasons that will be considered should be itemised here.</p> <p>It would be far better for GBC to insist on the maintenance of its existing woodland trees, hedgerows and irreplaceable habitats or provide definitive reasons which would be acceptable in planning applications.</p> <p>In the Blackwell farm proposal, ancient woodland is a barrier between the research park and the new development, is creating formal paths through an exceptional benefit if it increases sustainability for example by providing shorter cycling and walking journeys?</p>	<p>The policy aligns with NPPF para. 175 c where it states "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists". The NPPF provides an example of a wholly exceptional reason in footnote 58 but does not provide an exhaustive list and we do not think it is necessary to provide a list in the Local Plan.</p> <p>The policy has been amended to require submitted evidence to be 'robust', and decision makers will be able to consider whether this test has been met. It would not be reasonable to specify what would constitute evidence for the purposes of the policy. Where necessary and appropriate, the Council can seek technical advice to examine the submitted evidence. It would not be reasonable to prohibit applicants from producing evidence.</p> <p>The NPPF allows for the loss of irreplaceable habitats in wholly exceptional circumstances. If policy seeks to prohibit loss entirely, it will not be in general conformity with the NPPF.</p> <p>It is not reasonable for policy to set the weight that will be attributed to meeting national housing targets or creating new paths.</p>
Policy para 4b)	15 metres is insufficient buffer for ancient woodland. The buffer should be much larger.	The minimum 15m proposed buffer is consistent with Natural England's standing advice.

	<p>There should be wording to prevent a situation that leads to a human corridor developing through the habitat as a result of the development (e.g. short cuts).</p>	<p>While developments can be designed to discourage this behaviour (e.g. by not locating development such that routes through habitats become attractive), there is no way to prevent people doing so as planning does not cover human behaviour.</p>
	<p>The maintaining of existing trees/hedgerows surrounding developments / strategic sites can provide aesthetic screening of new developments which help make it a little more acceptable to existing communities. This should be added to this policy.</p>	<p>This is a design matter. The plan contains policies that cover issues such as boundary treatments and landscaping.</p> <p>Policy P6/P7 refers to the mitigation hierarchy which identifies avoidance of harm to biodiversity as the first step. As a result, development following this principle will avoid removing trees and hedgerows where possible. Alongside this, the Biodiversity Net Gain approach will discourage the loss of biodiverse features such as trees and hedgerows as this will increase the amount of biodiversity that has to be created or enhanced.</p> <p>However, there may be instances where trees and hedgerows that do not benefit from protection through law or policy have to be removed in order for a development to be delivered.</p>
	<p>The policy is impossible as long as the proposed greenfield development remains in the plan.</p>	<p>The LPSS was found sound by an independent planning inspector. One of the tests of soundness is whether it is sustainable. Sustainability comprises the balancing of environmental, social and economic considerations. The policies in the LPDMP will apply to the growth allocated in the LPSS and will deliver net gains to biodiversity and protection for irreplaceable habitats in line with national policy.</p>
	<p>Recent experience indicates that further provisions to preserve biodiversity and existing habitats are also necessary. Despite the provisions of the Wildlife and Countryside Act 1981 and other regulations, which (amongst other things) make it illegal to disrupt the nesting birds and/or breeding wild animals, or to interfere with their</p>	<p>The planning system can only govern the development and use of land and cannot prevent behaviour that is detrimental to wildlife, except in some circumstances where it relates to development practice (e.g. the transport of materials or hours of construction work).</p>

<p>habitats, it has become depressingly common for hedgerows or other nesting and breeding sites to be removed or seriously damaged in preparation of sites on which development is due to occur. Examples of this disregard for basic environmental protections are:</p> <ul style="list-style-type: none"> • Attempts to actively prevent birds from nesting in trees • Loss of an extremely old (probably many hundreds of years) and ecologically diverse hedge habitat (in contravention to the applicant's own initial proposals) in connection with an application site. <p>Despite the supporting text identifying the scale of the problem, the text of the existing consultation draft does not actually provide the protections that are so badly needed. What is required is for the Council to set out clear statements that it will actively support the provisions of the Wildlife and Countryside Act 1981 by specifically:</p> <ul style="list-style-type: none"> • Explicitly ruling out any and all attempts to discourage wildlife from nesting or breeding on any development site (both before and during any development activities). • Placing a specific embargo on the removing, damaging or otherwise interfering with relevant hedges (or other habitat) around, or on, an actual or prospective development site during the nesting or breeding season. The season should be explicitly specified, eg. February to July inclusive (or such other appropriate period to be advised by the Surrey Wildlife Trust). • Ensuring that initial statements made by planning applicants with the intention of facilitating the approval of their application are not subsequently "watered down" or reversed after the initial application has been granted. Such behaviour is not uncommon, but it brings the planning permission into disrepute and destroys public confidence in the system. 	<p>Where an applicant makes a statement about good practice, generally we will seek to make these subject to a planning condition. If they cannot be conditioned, they should not be taken into account in the decision-making process.</p> <p>Applicants are entitled by law to seek to have planning conditions removed and while the Council can refuse to do so applicants have the legal right to appeal that decision.</p> <p>The policy applies the irreplaceable habitat designation to specific biodiverse hedges and contains policy that implements the mitigation hierarchy which requires developments to avoid harm to existing biodiversity as a first step.</p>
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Policy P9 Priority species and priority habitats on undesignated sites ((incorporated into new Policy P8/P9 Protecting Important Habitats and Species in the LPDMP)		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Environment Agency		
	Support but this policy should include the requirement for a long term landscape and ecological management plan to be submitted to and agreed in writing by the Council. Such plans should include details of adequate financial provision, whether this is to be maintained by the developer/management company or given as a commuted sum to the Council. This should include details of how these habitats and species will be monitored and managed to ensure their continued protection and enhancement.	Appropriate conditions will be applied to ensure the long term management of biodiversity and open spaces, where this is appropriate. The proposed requirement has been added to P6/P7 for major development.
Surrey Nature Partnership		
4.106	Welcome and supported. Suggested amendment: “...It is important to ensure that the locally rare species are sufficiently protected <u>even if their national numbers are regarded as stable, as the loss of such species from local ecosystems is equally undesirable, and would anyway eventually threaten that national stability.</u> ”	This text was included in the Issues and Options document to help explain the preferred option but has not been carried over to the proposed submission version of the policy. If it is included in a topic paper, the amendment will be made.
Other organisations		
Surrey Wildlife Trust		
4.106	Welcome and supported. Suggested amendment: “...It is important to ensure that the locally rare species are sufficiently protected <u>even if their national numbers are regarded as stable, as the loss of such species from local ecosystems is equally undesirable, and would anyway eventually threaten that national stability.</u> ”	This text was included in the Issues and Options document to help explain the preferred option but has not been carried over to the proposed submission version of the policy. If it is included in a topic paper, the amendment will be made.

Compton Parish Council		
	<p>The mitigation hierarchy gives developers “wiggle room” to simply provide a “compensatory habitat”. In some cases, providing alternative habitats is not a solution and the policy does not address this. Woodland, for example, may need to be hundreds of years old before it creates conservation habitat of a comparable quality to that which is being lost or harmed.</p>	<p>This is not agreed. The hierarchy makes it clear that compensation is a last resort. Other policies protect specific irreplaceable habitats like Ancient Woodland and the policies make clear that compensation will not form part of the test for considering whether the loss of irreplaceable habitats is acceptable.</p>
Weyside Urban Village		
	<p>A “mitigation hierarchy” approach is set out in the policy but it should also be made clear that in relation to habitats the value and compensation requirements would be determined through the calculations required under use of the metric set out in Policy 7, where impacts on habitats could not be avoided.</p>	<p>This comment refers to the compensation requirements for the damage or loss of priority species and habitats. The mitigation hierarchy has been moved to the supporting text of policy P6/P7. This point is not agreed.</p> <p>The value of the habitat can be dependent on its local characteristics rather than just the value set by the Defra biodiversity metric (e.g. based on the species it supports or whether it is a key location in local biodiversity networks). Additionally, the metric only measures changes in habitat cover and not animal species.</p> <p>Given the relative importance of irreplaceable and priority habitats, while the metric is appropriate for measuring biodiversity gain and loss generally, it is not appropriate to use it to calculate the compensation necessary for the harm or loss of irreplaceable and priority habitats and species. As a result, the level of compensation necessary should be</p>

		considered on a case-by-case basis. The metric would form a starting point for drafting the compensation package.
National Trust		
	Concerned about the potential onerous nature of securing compliance with this policy and therefore its overall effectiveness in securing this goal, particularly on smaller development proposals. Suggest that this policy could be linked with that regarding BNG to enable the protection and enhancement of habitat or a priority species.	We do not agree that the policy is potentially onerous as it aligns with the provisions in the NPPF. The plan is read as a whole so policy P6/P7 (which covers Biodiversity Net Gain) will need to be considered alongside this policy. Under the national approach, developments will receive greater credits for supporting priority species and habitats.
Burpham Community Association		
	Agree but major developments should require a survey of species which live or feed there or have done so in the past. This should be independently verified e.g. by SWT or Surrey Nature [Partnership].	Under the national net gains approach, development sites will be subject to a pre-development biodiversity survey. The survey will have to conform with the Defra Biodiversity Metric methodology (or a national replacement). The veracity of the surveys will be considered by the planning decision maker, though the exact BNG role to be played by decision makers will be set by the forthcoming Environment Act and the possibly Planning Act.
Effingham Parish Council		
Policy para 1c)	Agree. The Effingham Neighbourhood Plan shows the designated wildlife corridors in Effingham parish. Propose adding to 1) c) "as identified in Neighbourhood Plans with the support of local wildlife advisors".	Neighbourhood Plans are development plan documents and are therefore already included under 1c.

East Horsley Parish Council		
	Agree but since parts of Guildford borough have adopted Neighbourhood Plans containing policies relating to the protection of species and habitats which form part of their Local Development Plan, reference to their applicability would also be appropriate within this policy.	Neighbourhood Plans are development plan documents and are therefore already included under 1c.
Taylor Wimpey		
Policy para 1) and 2)	<p>Suggest the wording is changed to 1) Requires proposals for development on or adjacent to sites where there is a priority species or habitat to preserve the relevant ecological features by applying the mitigation hierarchy, and to deliver enhancements in line with Policy P7. Priority species and habitats include: (...) it is not reasonable to require enhancements to land that could be outside of an applicant's control (i.e. adjacent sites). Therefore, the alterations to this wording make the policy more positively prepared by seeking to encourage enhancement, but not rendering the delivery of a development contingent on something which may not be possible.</p> <p>The addition of "by applying the mitigation hierarchy and to deliver enhancements in line with Policy P7" enables the deletion of part 2) of the policy ("2) The mitigation hierarchy should be applied, with avoidance of harm prioritised as the first step, followed by minimisation of harm, restoration and finally compensation as a last resort.")</p> <p>Should GBC decide to keep part 2), then TW suggest that the word "restoration" is removed, as this is a form of enhancement, which is not part of the mitigation hierarchy (it is considered separately) and is already addressed by Policy P7.</p>	<p>The proposed reference to the hierarchy has been added to the paragraph as it makes the policy clearer. The supporting text has been amended to explain the mitigation hierarchy at policy P6/P7.</p> <p>Regarding adjacent sites, this reference has been kept as sites adjacent to irreplaceable habitats should ensure the site design does not negatively impact those habitats. Additionally, there may be measures on the site that can enhance those habitats, such as provision of a semi-natural buffer that helps species dispersal or connectivity, or provision of complementary habitat that improves the health of the irreplaceable habitat.</p>
Policy para 1)	Part 1 of the policy lists out the priority habitats and species the policy is referring to. The term "habitats sites" needs clarification as this could be interpreted to mean 'Habitats Regulations' sites, including SPAs or SACs. TW request that GBC provide more clarity on what is meant here, for example, in the form of a footnote to the policy, or in the policy text.	Agreed. "Habitats sites" has been removed.

	It is not clear what “habitat register” is being referred to in part d) of the policy, so this should also be defined.	The reference to “habitats register” refers to the registered habitat sites proposed in the Environment Bill for off site biodiversity net gains. These words have been replaced with “biodiversity net gain sites” and are defined in the supporting text.
	The documents mentioned in part c) should be listed in order of hierarchy (and therefore their level of influence), as follows: the NPPF, DPDs, guidance by Natural England, guidance in SPDs and then Surrey Nature Partnership documents.	The policy does not introduce a hierarchy of documents but we have changed the order as suggested in order to reflect planning convention.
Martin Grant Homes		
	<p>We do not agree that ‘species and habitats protected by law’ (1a) should be considered as ‘Priority Species/Habitats’ for the purposes of Policy P9. Priority Species and Habitats are appropriately defined under existing legislation/policy (e.g. Species of Principal Importance for Conservation in England, listed on Schedule 41 of the NERC Act 2000) and Policy P9 should apply to these species and habitats only.</p> <p>Legal protection for a species does not, in itself, necessarily reflect its conservation importance; for example, badgers are legally protected, but are a common/widespread species in southern England.</p> <p>We therefore recommend the removal of reference to ‘species and habitats protected by law’ from the list of priority species and habitats identified in Policy P9.</p>	<p>The first bullet and the supporting text have been amended to refer to Species of Principal Importance for Conservation in England as set out in Schedule 41 of the NERC Act rather than all legally protected species.</p> <p>The second bullet has been amended to refer to species and habitats identified as priorities in strategies produced by the Surrey Nature Partnership and Natural England rather than “priority habitats and species identified in strategies produced by...” in order to avoid confusion between this clause and the priority species and habitats identified in the NERC Act.</p>
Burpham Neighbourhood Forum		
Para 4.102	[Re: the need for restoration to bring nature recovery, rather than just protection] This policy should be required by the word “Shall return any negative impact to the positive gain.”	Policy P6/P7 requires a biodiversity net gain from new development (except for specific exempted developments).

Policy para 1b)	[Re: policy protection for priority habitats and species identified by the Surrey Nature Partnership and Natural England] This list should include any relevant bodies with the same objectives.	<p>We assume this means documents produced by non-statutory bodies like the RSPB and Surrey Wildlife Trust.</p> <p>Surrey Nature Partnership is a designated “local partnership” with a mandate from government to coordinate planning for biodiversity across Surrey. Natural England is the public body responsible for overseeing the health of the natural environment in England. Both these bodies have a formal status in the planning system, which voluntary bodies do not have. However, both bodies engage with non-statutory bodies like those mentioned above, allowing them to play a role in shaping biodiversity strategies. It is envisaged that these bodies will be able to influence the proposed Local Nature Recovery Strategies.</p> <p>In addition, Policy P6/7 requires proposals to take account of other national, regional and local biodiversity strategies and the supporting text includes examples of strategies from groups like the RSPB and Buglife.</p>
Policy para 1c)	[Re: policy protection for priority habitats identified in Development Plan Documents and SPDs] Should include Neighbourhood Plans.	The policy refers to Development Plan Documents, which includes neighbourhood plans.
Other respondents		
Policy para 1)	How will an undesignated site with high biodiversity potential (not current value) be protected (particularly where the underlying geology supports important habitats in Surrey such as heathland or chalk grassland)? Such a site would have enormous potential for biodiversity if brought under appropriate management and that potential will remain if the site is left undeveloped. This could be covered by an additional	Refusing planning applications on the basis of future biodiversity value (rather than current value) would not be reasonable. However, the protection for ancient woodland

	point in 1) to allow for sites that have high, but currently unrealised, habitat and associated biodiversity potential.	takes into account soils that have potential to support ancient woodland habitat.
	The policy should be to protect all habitats, not just priority habitats.	<p>The plan will protect important biodiversity features and provide net gains for biodiversity.</p> <p>All undeveloped land and some developed land would be considered to provide habitat to some degree. It would not be reasonable to place a blanket restriction on all that land.</p>
	<p>The policy lacks teeth. It is often virtually impossible for developments not to damage habitats in the process of construction, and claims that they will enhance relevant ecological features are often not followed through or take a too-narrow view of what is considered to be “relevant” features, ignoring the wider ecosystem. I would therefore prefer a policy that has the strength of policy P8, which refuses developments that damage irreplaceable habitats.</p>	<p>Irreplaceable habitats are granted a special status in the planning system and other types of habitat cannot be afforded the same level of protection. The forthcoming Environment Bill will place a legal duty on qualifying development to achieve a net gain in biodiversity and includes a process for assessment and monitoring.</p>

Policy P10 – Contaminated Land		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey Nature Partnership (SyNP)		
	Policy supported.	Noted.
The Environment Agency		
	<p>The content of the preferred option is comprehensive and will act to strengthen the justification for contaminated land planning conditions to be applied where necessary.</p> <p>Contaminated land is not addressed in the overarching planning policies in the Local Plan Part 1. Therefore, it is very important that a robust policy, such as written in the preferred option for policy P10, is included in Part 2.</p>	Agreed.
Policy P10 (1) (c)	<p>From a biodiversity perspective, this policy should make it clear that measures to improve upon the current situation are included where feasible. This is particularly important where sites of ecological value are being impacted by adjacent contaminated land.</p>	<p>The development plan should be read as a whole. Other proposed policies (currently P6/P7 and P8/P9), alongside Policy ID4 of the LPSS, require the consideration of opportunities to implement measures to promote biodiversity net gains. The focus of this proposed policy is to ensure that potentially contaminated sites are appropriately remediated and managed prior to occupation. Therefore, it is considered unnecessary to include additional text to reference biodiversity net gains within the policy.</p>

Other organisations		
Cranleigh Road Area Residents Association		
Policy Box	The policy should refer to taking account of potential consequences of water flows through a site including flood water.	The policy now states that an Options Appraisal and Remediation Strategy is required – this must demonstrate the appropriate sustainable remediation measures that will be implemented in order to prevent and/or avoid significant harm to sensitive receptors, both on-site and in the surrounding area. This would include through water flows.
	A record should be required of any material contained within a remediated site to avoid future disturbance.	Policy criteria (2) requires that appropriate remedial measures are included to prevent risk to the surrounding area and future users of the site. Record of materials present on a remediated site will likely be presented within the various assessments accompanying an application, alongside the required 'Verification Report'.
Send Parish Council		
	Remedial works for contaminated land would be governed by pre-commenced 'planning conditions'. Once planning permission has been granted there is no real transparency / or accountability about how such planning conditions are then discharged.	The policy requires that a 'Verification Report' is submitted to the Council prior to either occupation or use, which must demonstrate that the agreed remediation measures have been implemented effectively.

Guildford Residents Association		
Policy	<p>We support the inclusion of such a policy. The wording would benefit from being more definite, as for example:</p> <p>‘1. Where development is proposed on land that is known or suspected to be contaminated, including land which is suspected of being affected by contamination from adjacent land, then:</p> <p>a) the full nature and extent of contamination must be established...</p> <p>b) where evidence of contamination exists, the land must be...</p> <p>c) appropriate remedial measures are to be included...</p> <p>d) prior to either occupation or use, a ‘Verification Report’ shall...’</p>	<p>The policy wording has been amended in order to prepare the policy for the Regulation 19 stage. The new wording is considered to be sufficiently clear.</p>
Taylor Wimpey		
Policy point (1)	<p>Proposed amendment:</p> <p>“1)...and associated works are to be carried out to industry best practice guidelines <u>at the time of application,..</u>”</p>	<p>The proposed amendment is considered unnecessary. The remediation and associated works agreed upon and conditioned at the time of the planning application would be required to be at industry best practice standards at that time. The conditioned remediation and associated works would need to be undertaken to those standards in discharging that condition.</p>
Policy (1) (a)	<p>Proposed amendment:</p> <p>“a) the full nature and extent of contamination is established through suitable assessments; clarifying that site investigations, risk assessment, remediation and associated works are to be carried out to industry best practice guidelines. <u>This should be a condition on the approved decision notice</u>. <u>at the time of application,..</u>”</p>	<p>Planning conditions will be applied to approved decision notices where appropriate, it is not considered necessary to articulate this within the policy itself.</p>

	<p>TW support the alternative option which is to not to have a policy on contamination.</p>	<p>The purpose of the proposed policy is to complement the existing regulatory framework, providing additional validation requirements on applicants and developers in order to ensure that the site has been fully remediated and appropriately designed (made fit for purpose) prior to occupation or use.</p>
<p>Residents for Guildford and Villages / Guildford Green Belt Group</p>		
	<p>While we believe the preferred option would comply with the requirements as set out in the NPPF, Planning Practical Guidance and associated legislation, we are keen for GBC to exceed these standards to not only safeguard, but enhance the Borough's environment for its flora, fauna, residents and visitors.</p>	<p>The purpose of the proposed policy is to ensure that potentially contaminated sites are fully remediated and appropriately designed (made fit for purpose) prior to occupation or use in order to prevent unacceptable risk to sensitive receptors on or near the site.</p> <p>The development plan should be read as a whole. Other proposed policies (currently P6/P7 and P8/P9), alongside Policy ID4 of the LPSS, require the consideration of opportunities to implement measures to promote biodiversity net gains. Therefore, it is considered unnecessary to include additional text to reference biodiversity net gains within the policy.</p>

Burpham Community Association		
	Opportunities to use remediation to increase biodiversity and tree cover (as well as provide housing) should be considered.	The development plan should be read as a whole. Other proposed policies (currently P6/P7 and P8/P9), alongside Policy ID4 of the LPSS, require the consideration of opportunities to implement measures to promote biodiversity net gains. Therefore, it is considered unnecessary to include additional text to reference biodiversity net gains within the policy.
East Clandon Parish Council		
	This should be handled by other appropriate statutory authorities. For this reason, we support Alternative Option 1 to rely upon NPPF and PPG and not to have a specific policy in the DMP for this topic.	The proposed policy is intended to complement the existing regulatory framework. The policy seeks to ensure that developments are made fit for their intended purpose and provides additional checks on applicants and developers to provide validation that the remediation and design features of the site have been implemented fully before occupation.
Burpham Neighbourhood Forum		
Paragraph 4.112	Clear reference to known impending contamination problems at Weyside Urban Village, and should be referenced as such. The wording is unacceptable for a supporting Paragraph and would not be acceptable if this was not a Council instigated Project. We oppose the inclusion of such loose and preferential wording to allow short cuts and cost reduction. Contaminated sites should be cleaned up properly or sealed for 100 years from last use.	The policy is intended to address the proposed development of contaminated land within the whole borough. Weyside Urban Village is not the only example of potentially contaminated land in Guildford. The policy is therefore worded in order to capture all instances of proposed development on potentially contaminated land and reflects national guidance.
Policy P10 (1)	Recommended that a Weyside Urban village section to this policy is added.	Specific sections within this policy for particular sites is considered unnecessary. The policy is worded in order to address the redevelopment of any potentially contaminated site within the borough.
Merrow Residents' Association		

Paragraph 4.111 and Policy Box	In paragraph 4.111 it is stated that the remediation of the contaminated land should be sufficient to avoid risk of contaminants to sensitive receptors. Then the policy states that 'aims of the policy could be ensure by...' This is far too weak and permissive.	This wording was not intended to be part of a final policy and represented the context set as part of the Regulation 18 'Issues and Preferred Options' Consultation. The policy wording has been completed as part of the preparation for the Regulation 19 consultation.
Ockham Parish Council		
	We support sustainable development to fulfil housing needs but do not agree that brownfield land in rural locations falls into this category. We do not support Policy P10 proposed and feel that it will almost certainly compromise sensitive receptors and is inappropriate.	National guidance promotes the appropriate redevelopment of potentially contaminated brownfield sites in order to support housing delivery. The policy supports this approach. The development plan should be read as a whole. This policy alone does not determine whether a particular brownfield site is appropriate for development, other policies within the development plan will guide this. However, this policy is intended to secure that, where the redevelopment of contaminated land is deemed appropriate, it is done so in an appropriate way and made fit for its intended purpose.
East Horsley Parish Council		
	This is a highly sensitive subject where critical roles are played by other statutory authorities. For this reason we support Alternative Option 1 to rely upon NPPF and PPG and not to have a specific policy in the DMP for this topic.	The proposed policy is intended to complement the existing regulatory framework. The policy seeks to ensure that developments are made fit for their intended purpose and provides additional checks on applicants and developers to provide validation that the remediation and design features of the site have been implemented fully before occupation.

Other respondents		
	Agree with preferred option. Please make the requirements more definite.	The policy wording has been finalised to improve clarity for the Regulation 19 consultation.
	Remedial works for contaminated land would be governed by pre-commenced 'planning conditions'. Once planning permission has been granted there is no real transparency / or accountability about how such planning conditions are then discharged.	The intention of the policy is to improve this situation. In order to achieve this, Policy point (3) requires that a 'Verification Report' is submitted to the Council prior to either occupation or use, which demonstrates the agreed remediation measures have been implemented effectively.
P10 (1) (d)	Point (d) should be prior to any construction work taking place.	This is often not possible as some construction works may be necessary as part of the remediation process. The current policy wording is considered appropriate.
	This is welcome, but I would also like to see some incentives to developers to come forward with proposals to build on previously contaminated land. Otherwise there is a danger that these very reasonable requirements will be used as a reason for looking elsewhere. It ought to be a policy objective in its own right to bring contaminated land back into safe and productive usage.	This is beyond the scope of this policy. National guidance promotes the appropriate redevelopment of potentially contaminated brownfield sites in order to support housing delivery. The policy supports this approach.

Policy P11 – Air Quality and Air Quality Management Areas		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey Nature Partnership		
	Supported.	Noted.
Natural England		
	Recommended inclusion of a section on impacts to designated sites and the environment. Only human health currently mentioned.	<p><i>Sensitive Receptors</i> are defined as features that are prone to damage from pollution, such as living organisms, including humans and animals, ecological systems, sensitive habitats, and the natural environment. However, to improve clarity, Criteria (2) now specifically references ‘sensitive habitats and any sites designated for their nature conservation value’.</p> <p>In addition, Criteria (3)(b) requires that development proposals must be subject to an Air Quality Assessment where the proposed development is within close proximity to a sensitive habitat, including any site designated for its nature conservation value.</p> <p>Where Criteria (3)(b) applies, Criteria (4) requires that; if the Air Quality Assessment identifies the potential for significant adverse impacts, the applicant must submit an Emissions Mitigation Assessment which details the appropriate avoidance and mitigation measures that will be implemented to prevent significant adverse impacts on sensitive receptors, including future occupiers or users of the site from any sources of emissions to air.</p>

	<p>Air quality may well need to be considered in combination with all other Local Plans nearby to Guildford. We draw your attention to the Dutch Nitrogen Case, the Wealden Judgement and Natural England's detailed advice on the procedure for air quality assessment.</p>	<p>Criteria (3)(a) requires that development proposals submit an Air Quality Assessment where Major Development is proposed and has the potential, including when combined with the cumulative effect of other approved developments and site allocations, to have significant adverse impacts on air quality.</p> <p>Criteria (4) requires that, where an Air Quality Assessment identifies potential significant adverse impacts on sensitive receptors from any source of emissions to air, the applicant must submit an Emissions Mitigation Assessment, detailing the appropriate avoidance and mitigation measures that will be implemented to prevent significant adverse impacts on sensitive receptors.</p>
<p>Other organisations</p>		
<p>Guildford Residents' Association</p>		
	<p>Planned growth in the LPSS is likely to have an adverse impact on air quality across the borough, which is at odds with the aim of reducing exposure to poor air quality. With this in mind, we suggest revision of the wording of the first statement as follows:</p> <p>'1) Is designed to minimise the potential adverse impact of development on health and quality of life from air pollution.'</p>	<p>The LPSS was found sound by an independent inspector following an Examination in Public. The Plan was subject to an Habitats Regulation Assessment (HRA) and Sustainability Appraisal (SA), which included relevant 'appropriate assessments' to assess the potential air quality impacts of relevant allocated sites. The Inspector considers these issues, in particular Air Quality impacts in relation to the HRA, from paragraphs 112 – 114 of the Inspector's Report.</p> <p>The recommended wording has been incorporated within the various Policy Criteria. In particular, Criteria (1) now states that development should have regard to the need to improve air quality and reduce the effects of poor air quality.</p> <p>In any event, Criteria (2) requires that development must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air.</p>
<p>Cranleigh Road Area Residents Association</p>		

	<p>The policy should give more attention to cumulative effects and require assessment of impact on air quality at peak times including congestion.</p>	<p>Cumulative effects of air pollution are covered within other regimes, such as Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA).</p> <p>In addition, Criteria (3)(a) now requires that development proposals submit an Air Quality Assessment where Major Development is proposed and has the potential, including when combined with the cumulative effect of other approved developments and site allocations, to have significant adverse impacts on air quality.</p> <p>Air Quality Assessments should be based on robust assessments of impact and will be a matter for consideration by Guildford Borough Council's Regulatory Services and the appropriate planning officer. If a significant impact is considered likely, it should be avoided, mitigated, or the application refused.</p>
	<p>The policy should also require baseline air quality assumptions to be agreed with the LPA to ensure that these are not overly optimistic about traffic flows and air quality trends.</p>	<p>Guidance on 'best practice' in conducting Air Quality Assessments has been referenced in the supporting text. The matter of baseline data is for consideration by Guildford Borough Council's Regulatory Services. The data is likely to change over time and would therefore be inappropriate to include within the policy itself.</p>
	<p>The policy should be clear that biomass technology should not be considered a sustainable option if emissions are unmitigated and that solar is more sustainable.</p>	<p>This Criterion has been removed from the policy.</p>

The Guildford Society		
	<p>The aims of this new policy are welcome, but the wording will have to be framed very carefully. The general statement “Will only permit development where it will not give rise to adverse impacts” could be used to oppose all large housing developments.</p>	<p>Policy drafted to improve clarity in this regard. Criteria (3)(a) requires that where Major Development is proposed which has the potential, including when combined with the cumulative effect of other approved developments and site allocations, to have significant adverse impacts on air quality, an Air Quality Assessment must be submitted.</p> <p>Where the Air Quality Assessment identifies potential significant adverse impacts, the applicant is required to submit an Emissions Mitigation Assessment, which provides detail on the appropriate avoidance and mitigation measures that will be implemented in order to prevent the development resulting in significant adverse impacts on sensitive receptors.</p> <p>Additionally, Criteria (9) states that if there are likely to be significant adverse impacts that cannot be mitigated, the application should be refused. These are clear, standard tests.</p>
	<p>The policy needs strengthening to mention that if an Air Quality assessment of a development shows the development will cause or extend an AQMA this pollution must be mitigated before a development can be approved.</p>	<p>Criteria (2) now requires that development must not result in significant adverse impacts on sensitive receptors, including human health, from any sources of emissions to air. If there are likely to be significant adverse impacts that cannot be mitigated, the application should be refused.</p> <p>Criteria (3)(c) and (d) require that an Air Quality Assessment is submitted where:</p> <ul style="list-style-type: none"> c) development would introduce or intensify sensitive uses within an area that is known to experience existing poor air quality conditions, including an Air Quality Management Area (AQMA). d) the proposed development would be likely to result in the increase of pollution levels within an Air Quality Management Area (AQMA).
Taylor Wimpey		

Policy P11 (1)	Suggested amendment to improve clarity: "1) Will only permit development where it will not give rise to <u>material or severe adverse</u> impacts on health and quality of life from air pollution".	The policy wording has been redrafted in order to make reference to significant adverse impacts. This represents industry best practice and is sufficiently clear.
Policy P11 (4)	"Mitigation" has the potential to be particularly onerous, "avoidance" would be a more appropriate choice of word. On this basis, TW believe that the policy should be amended to: "4) Requires applicants to demonstrate that appropriate <u>mitigation avoidance measures</u> will be provided to ensure that the new development is appropriate for its location and unacceptable risks are avoided".	Reference to both avoidance and mitigation measures represents industry best practice. Mitigation measures are not necessarily onerous, examples of such measures are regularly deployed within development proposals as standard. Criteria (4) requires that, where an Air Quality Assessment identifies potential significant adverse impacts on sensitive receptors from any source of emissions to air, the applicant must submit an Emissions Mitigation Assessment, detailing the appropriate avoidance and mitigation measures that will be implemented to prevent significant adverse impacts on sensitive receptors, including future occupiers or users of the site, sensitive habitats, and any sites designated for their nature conservation value, from any source of emissions to air.
Savills		
	Supportive of the aims to reduce exposure to poor air quality. However, noted that the preferred option should mention potential for negative Air Quality effects on protected sites/habitats in addition to effects on human health.	Agreed. Criteria (2) and (3)(b) have been revised to include specific reference to sensitive habitats and sites designated for their nature conservation value.
Guildford Vision Group		
	Agree. Suggestion that the gyratory area Bridge Street / Onslow Street junction deserves study, with the firm expectation that an AQMA should be established.	This is outside the scope of this policy in any event.
The Woodland Trust		
	Trees and hedgerows can improve air quality by absorbing pollutants, for example, by planting trees to shield school	Noted. Criteria (4) requires that, where an Air Quality Assessment identifies the potential for significant adverse

	playgrounds, and should be considered as part of any mitigation strategy.	impacts, an Emissions Mitigation Assessment must be submitted, detailing the appropriate avoidance and mitigation measures that will be implemented to prevent those impacts. Given the numerous examples of potential avoidance and mitigation measures that could be implemented to achieve this, it is considered appropriate for the applicant to propose appropriate measures in the first instance. Criteria (5) also states that proposed avoidance and mitigation measures are expected to be designed to maximise their ecological and aesthetic value.
Policy P11 (1)	Recommended to re-word (1) to include reference to impacts on the natural environment: 1) Will only permit development where it will not give rise to adverse impacts on health, amenity, or the natural environment from air pollution.	Criteria (2) now requires that development must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air. If there are likely to be significant adverse impacts that cannot be avoided or mitigated, the application will be refused.
Policy P11 (2)	Ancient woodland is greatly at risk from ammonia pollution. Recommend therefore adding specific requirements that additional screening will be required of all ammonia-emitting developments, such as intensive livestock units, within 5km of an ancient woodland site, with a detailed 'Ancient Woodland Nitrogen Impact Assessment' of the ancient woodland of concern. This will need to demonstrate that there will be no deterioration or impacts as a result of the contributions from this development. In support of this, we propose additional wording: 2 e) are likely to result in an increase in pollution levels affecting ancient woodland and other protected habitats.	Criteria (2) requires that development must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air. Ancient Woodland comprises a sensitive habitat and is therefore protected from 'any sources of emissions to air' resulting from development. This is sufficient to address the issue raised. The supporting text also outlines the specific pressures relating to Ancient Woodland.
Effingham Parish Council		
	Agree, but would like to add to the policy: 1. Minimising the impact of traffic congestion in high pollution areas	The recommendation provides a list of examples of appropriate avoidance and mitigation measures that could be implemented should an Air Quality Assessment identify potential for significant adverse impacts on sensitive receptors.

	<p>2. Providing facilities for low-pollution transport,</p> <p>3. Controlling dust and emissions from industrial, farming, construction and demolition operations</p>	<p>The policy requires such measures to prevent development resulting in significant adverse impacts. Criteria (8) provides that, where required, planning obligations will be used to secure contributions to measures to tackle poor air quality.</p>
West Horsley Parish Council		
	<p>This is obviously an area of significant concern in our Borough. There should clearly be more AQMAs.</p>	<p>The designation of AQMAs is outside the scope of the policy.</p>
	<p>What are the levels around the Borough? It would be helpful to publish a table of levels and encourage additional monitoring.</p>	<p>GBC Regulatory Services are responsible for the collection and publication of data. It is outside the scope of this policy.</p>
	<p>There is no guidance provided as to how developers will be expected to ensure that air quality is improved.</p>	<p>Standard assessment processes, 'best practice' and 'good principles' are set out in referenced guidance documents.</p> <p>Criteria (4) requires that, where appropriate, applicants must detail the appropriate avoidance and mitigation measures that will be implemented to prevent significant adverse impacts on sensitive receptors from any sources of emissions to air.</p> <p>The avoidance and mitigation measures that may be implemented in a development are numerous and varied. It is considered appropriate for the applicant to propose such measures in the first instance. However, Criteria (8) provides that, where required, planning obligations will be used to secure contributions to measures to tackle poor air quality.</p> <p>Criteria (7) requires that a 'Verification Report' is submitted and approved prior to the development's occupation or use, which demonstrates the measures have been implemented.</p>
Shalford Parish Council		
	<p>Define "adjacent to"?</p>	<p>This has been removed from the policy.</p>
	<p>Tree protection and planting should be implemented within AQMA's to reduce pollution.</p>	<p>Strategy for addressing air quality within AQMAs is developed by GBC's Regulatory Services. The relevant Air Quality Action</p>

		<p>Plan for each AQMA details examples of appropriate measures that could help improve air quality in the AQMA.</p> <p>Criteria (6) requires that development proposals within, and in close proximity to, Air Quality Management Areas are required to demonstrate how the proposed avoidance and mitigation measures would make a positive contribution towards the aims of the Council's Air Quality Strategy and the appropriate Air Quality Action Plan.</p> <p>Tree protection and planting represent an example of such measures. Given the range of potential appropriate measures, it is considered appropriate for the applicant to propose appropriate measures in the first instance.</p> <p>Criteria (5) also states that proposed avoidance and mitigation measures are expected to be designed to maximise their ecological and aesthetic value.</p>
	<p>How will the effects of development which leads to increased traffic to the area be managed and mitigated?</p>	<p>Criteria (2) requires that development must not result in significant adverse impacts on sensitive receptors... from any sources of emissions to air. Where a potential significant adverse impact is identified, the applicant is required to implement avoidance and mitigation measures to prevent it. It is considered appropriate for applicants to propose such measures in the first instance. However, Criteria (8) provides that, where required, planning obligations will be used to secure contributions to measures to tackle poor air quality.</p>

Reach Plc		
	Support the requirement for an 'air quality assessment for development proposals that have the potential for significant air quality impacts'. However, the scope of such an assessment should be proportionate to the potential impacts and this should be made clear in any future policy.	Standard assessment processes and 'best practice' guidance are set out in various guidance on Air Quality Assessments and Emissions Mitigation Assessments. The supporting text outlines the minimum requirements that should be included within an Air Quality Assessment report. However, the approach and methodology that is undertaken should be agreed with the Council's Regulatory Services in each case, which should be proportionate.
Merrow Residents Association		
	One simple remedial action to improve air quality in Burpham and Merrow is to demand either a 4-way junction with the A3 on the Gosden Hill Farm site or to have a link road running south of the A3 from the site to the new slip roads on the A247 at Garlick's Arch to avoid the need for north bound traffic from the site to either go through Burpham to the A3 or through the outskirts of Merrow.	This is outside the scope of this policy.
Ripley Parish Council		
	It is important that air quality is investigated in the areas surrounding new developments. There is no mention of the dire results from air quality investigations on Ripley High Street in spring 2017 (in relation to the Lovelace Neighbourhood Plan). Such results should strongly influence planning of new developments in the area.	Criteria (2) requires that development must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air. This includes emissions from vehicle traffic. Criteria (3)(a)-(d) require that, where appropriate, an Air Quality Assessment must be submitted with the application. This assessment would include information identifying any potential significant adverse impacts on sensitive receptors from any source of emissions to air, including vehicle traffic.

Compton Parish Council		
Policy P11 (1)	<p>Proposed amendment:</p> <p>“In particular, development proposals within, adjacent to, <u>or impacting on,</u> an Air Quality Management Area (AQMA) will be expected to be designed to mitigate the impact of poor air quality on existing and future occupiers”.</p>	<p>Policy wording has been added in order to strengthen the protection of Air Quality Management Areas:</p> <p>Criteria (3)(c) and (d) require that an Air Quality Assessment is submitted where:</p> <ul style="list-style-type: none"> c) development would introduce or intensify sensitive uses within an area that is known to experience existing poor air quality conditions, including an Air Quality Management Area (AQMA). d) the proposed development would be likely to result in the increase of pollution levels within an Air Quality Management Area (AQMA). <p>Criteria (4) provides that, where an Air Quality Assessment identifies potential significant adverse impacts on sensitive receptors from any source of emissions to air, the applicant must submit an Emissions Mitigation Assessment, detailing the appropriate avoidance and mitigation measures that will be implemented to prevent significant adverse impacts on sensitive receptors, including future occupiers or users of the site, from any sources of emissions to air.</p>
	<p>The policy acknowledges the impact of biomass, but not traffic, which is the main culprit at present. An independent assessment of the impact of a new site on its surrounding area should therefore include the accumulative impact of pollution from traffic on existing AQMA's and borderline areas.</p>	<p>Criteria (3)(a)-(d) require that, where appropriate, an Air Quality Assessment must be submitted with the application. This assessment would include information identifying any potential significant adverse impacts on sensitive receptors from any source of emissions to air.</p>
	<p>We would also like to see the re-establishment of a permanent air quality monitoring station.</p>	<p>This is outside the scope of this policy.</p>

Ockham Parish Council		
Policy P11 (4)	Due to the pollution from road traffic within Guildford and the PHE estimate that 5.7% of deaths of those aged 25 yrs + arise from long term exposure to anthropogenic particulate air pollution, we do not feel that Policy 11 is sufficiently robust. A number of strategic sites are close to main arterial roads and we have never seen sufficient mitigation provided as stated at 4.125 (4).	<p>Policy wording has been revised in order to strengthen the requirements in this regard.</p> <p>Criteria (3)(a) requires that an Air Quality Assessment must be provided where Major Development is proposed and has the potential, including when combined with the cumulative effect of other developments already permitted, to have significant adverse impacts on air quality.</p> <p>Criteria (4) requires that where an Air Quality Assessment identifies potential significant adverse impacts on sensitive receptors from any source of emissions to air, the applicant must submit an Emissions Mitigation Assessment, detailing the appropriate avoidance and mitigation measures that will be implemented to prevent significant adverse impacts on sensitive receptors, including future occupiers or users of the site, from any sources of emissions to air.</p>
West Clandon Parish Council		
	<p>Poor air quality appears to be undefined but presumably could be referenced to published standards. The preamble to the policy states - "policy that seeks to ensure new development does not have adverse impact on air quality by taking into account the presence of Air Quality Management Areas (AQMAs) and seek opportunities to actively improve air quality borough-wide to help secure net improvements in overall air quality where possible." Elsewhere, the term unacceptable impact is used. Are these terms defined or can they be by reference to published standards as above?</p>	<p>'Unacceptable impact' has been replaced with 'significant adverse impact'. This represents standard industry terminology, adopted by the Institute of Air Quality Management. What comprises a 'significant adverse impact' depends on the context of the existing site and also the proposed development. As such, it is not possible to define specific limits within the policy.</p> <p>'Significance' is determined on a case-by-case basis, based on the available evidence, including the findings of the Air Quality Assessment, which must be accepted and agreed by GBC's Regulatory Services.</p>

	Will development be permitted which increases pollution up to the threshold for an AQMA?	Criteria (2) requires that development must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air. If there are likely to be significant adverse impacts that cannot be mitigated, the application should be refused.
Burpham Neighbourhood Forum		
Policy P11 (1)	We note this policy only seeks to mitigate on future occupiers and thus fails NPPF feb2019 section 8b relating to the social objectives specifically community health.	Criteria (2) requires that development must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air. This includes impacts on both existing communities and future users of the development.
Other respondents		
	Agree with preferred option. There should be an air quality action plan covering the whole borough.	This is outside the scope of the policy.
	There is no mention of transport's contribution to air quality, which seems to be a major omission.	Criteria (2) now requires that development must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air. This includes emissions from vehicle traffic.
	Priority given to other sustainable energy - wind, solar and heat pumps with Biomass being carefully monitored as it is not only a possible pollutant but can lead to deforestation if not managed.	This Criteria has been removed. LPSS Policy D2 requires the use of sources of energy in accordance with a hierarchy. The Climate Change, Sustainable Design, Construction and Energy SPD provides further detail. Additional detail is not considered necessary in this policy.

	<p>The policy should not actually support biomass technology that reduces air quality. The supply side of biomass is also relevant to overall emissions. The locations described should be regarded as unsuitable for development on these grounds. Nationally, we are supposed to be moving away from natural gas. Perhaps some clarification is needed in that regard.</p>	<p>This Criteria has been removed from the policy. Policy D2 in the LPSS requires that proposals implement sources of energy in accordance with a set hierarchy. The Council's Climate Change, Sustainable Design, Construction and Energy Supplementary Planning Document sets out further detail in relation to sustainable energy use. Additional detail is not considered necessary in this policy.</p> <p>In any event, Criteria (2) requires that development must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air. If there are likely to be significant adverse impacts that cannot be mitigated, the application should be refused. This includes emissions from Biomass.</p>
	<p>The document recognises that "road traffic is a significant cause of air pollution in the borough", yet most of the Policy seems to relate to limiting the harmful effects of biomass technology. The most effective way of improving air quality is to reduce the number of vehicle journeys and to insist on clean air technology in all vehicles. Is there a link to other policies that will bring this about?</p>	<p>The policy has been intentionally drafted in order to capture the assessment of <i>all sources of emissions to air</i> within a single, clear assessment and avoidance/mitigation process. Vehicle emissions are included within this process.</p> <p>The supporting text for this policy also clarifies that in the determination of planning applications, the Council will consider the impact of development in terms of the impacts on air quality caused both by the operational characteristics of the development and the vehicle traffic generated by it.</p> <p>Where an Air Quality Assessment, as required by Criteria (3), identifies the potential for significant adverse impacts on air quality as a result of the proposed development, Criteria (4) requires that an Emissions Mitigation Assessment is submitted, which outlines the appropriate avoidance and mitigation measures that will be implemented to prevent those potential impacts. Examples of such measures may include reducing the number of vehicle journeys and provision for electric vehicle charging.</p>

Policy P12 – Water Resources and Water Quality		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey Nature Partnership		
Paragraph 4.127	References to 'South East River Basin Management Plan' should be amended to 'Thames River District Basin River Basin Management Plan'.	The reference has been amended to 'Thames river basin district river basin management plan' to reflect the wording on the government's website.
The Environment Agency		
Policy P12 (1)	Policy P12 aims to ensure that new development does not cause an unacceptable risk to surface or groundwater resources. It should also aim for new development to implement measures to improve water quality, specifically the Water Framework Directive (WFD) status of a waterbody. Guidance on this could be provided in a separate advice note/SPD.	The policy has been extended to cover waterbodies and watercourses and includes criteria that protects the chemical and ecological status of watercourses and requires development to seek opportunities to implement measures to improve water quality and the Water Environment Regulations (WER)/Water Framework Directive (WFD) status.
Policy P12 (1)	To strengthen Policy P12 the word ' <u>unacceptable</u> ' should be removed as it is subjective.	The policy has been redrafted and "unacceptable" has not been used as a qualifier.
Policy P12 (1)	Policy P12 should require development to demonstrate that it will not cause deterioration in a waterbody's status/potential or prevent achievement of good status/potential.	Amendments made.
Policy P12 and Paragraph 4.127	Paragraph 4.127 and policy P12 itself reference the South East River Basin Management Plan (RBMP). The RBMP relevant to the Borough of Guildford is actually the Thames RBMP.	Amendments made.
	Recommended that a separate policy on watercourses and their riparian corridors is included. This will help to protect and enhance	The model policy provided by the Environment Agency has been used as the basis for a new policy, which has then been

	the ecological value of watercourses, in addition to the quality and quantity of water resources, which is covered in Policy P12.	combined with the water quality policy. The protects and enhances the ecological value, quality and quantity of watercourses as well as other waterbodies.
	Policy P12 does not mention how water efficiency will be managed. This is particularly important as Guildford is in a water stressed area. We would expect to see reference to the water company's Water Resource Management Plan.	Water efficiency standards in new developments are covered within policy D2 in the LPSS and proposed policy D12. Further detail on the management of water efficiency and specific mention of the water company's Water Resource Management Plan have been included in the supporting text to Policy D12. A clause has been included in the new combined watercourses and water quality policy that limits high water usage developments' draw from environmental water stocks or the public water supply. We have not added a further reference to the water resource management plan as this would not have an impact on planning decisions or explain any of the clauses in P12.
	The document highlights that the area uses groundwater for abstraction and this forms many of the main driving points for protection. In this area there is a surface water drinking water protected area and a surface water safeguard zone and the wording should reflect this.	The policy has been updated with a clause that protects ground and surface water drinking water resources.
Other organisations		
The Woodland Trust		
Policy	The policy does not mention the use of natural solutions for flood management or making improvements to water resources. Recommendation to include an additional policy criteria: 4) Support natural solutions to a safe and resilient water supply, including riparian trees and natural flood management.	New policy P12 includes reference to Natural Flood Management where it relates to improving watercourse ecology by linking up rivers with their floodplains. The revised Sustainable Surface Water Management policy implements natural solutions to address flooding.
Cranleigh Road Area Residents' Association		

	This policy should include management of demand for water abstraction.	A clause has been included in new policy P12 that prevents qualifying high water usage developments from drawing water from environmental stocks or the public water supply. Water efficiency standards for new development are covered within policy D2 of the LPSS and proposed policy D12. Abstraction of water by water companies is not a matter for the local plan.
Guildford Residents Association		
Paragraph 4.137	Para 4.137 explains that this policy is focused on water quality. We are also concerned about water supply, given the scale of development planned in LPSS, and the fact that the borough is in an area of severe water stress. How will this be addressed?	Water efficiency standards for new development are covered within policy D2 of the LPSS and proposed policy D12. A clause has been included in the new combined watercourses and water quality policy that prevents some high water usage developments from drawing water from environmental stocks or the public water supply.
Guildford Society		
	Policy P12 seeks to ensure that new development does not cause an unacceptable risk to surface or groundwater resources, it should also cover major redevelopment of buildings so that water quality is raised.	The revised policy refers to 'development', which would apply to any works that require planning permission. If a redevelopment does not require planning permission, the policy could not be applied.
Taylor Wimpey		
	A specific policy on this aspect is not considered necessary. Rather, it is sufficient for GBC to rely on developers entering discussions with the Environment Agency and the Lead Local Flood Authority, and complying with Local Plan Policies such as Policy A35 for the FWA which requires TW to ensure that sufficient capacity is available within Ripley Wastewater Treatment Works to accept wastewater from FWA.	This is not agreed. The Environment Agency supported the Preferred Option and also asked for further policy on watercourses, and the Lead Local Flood Authority supports the local policy on flooding. Given the importance of water quality for reversing the decline in biodiversity, the Council's view is that it should be addressed through local policy so that potential developers understand requirements up-front.

	<p>If the policy is to be retained, TW request that GBC provide more clarity on which allocated sites could potentially be captured by part 3 of this draft policy. Should the policy remain, it is requested Part 3 is amended to:</p> <p>3) Requires new development that is likely to have an <u>material or severe</u> impact on underground or surface water bodies covered by the Water Framework Directive and the <u>South-East Thames</u> River Basin Management Plan....”</p>	<p>The revised policy sets out more clearly the requirements placed on developments that could adversely impact waterbodies.</p> <p>It would not be possible to limit the impacts to material or severe impacts where WER/WFD waterbodies are concerned as legislation requires not only the impact on status to be zero, but also for the scheme to avoid hindering improvements. For non-WER/WFD waterbodies, the Council believes it would not be desirable to allow any negative impacts, no matter how minor, as a matter of principle.</p> <p>Given the poor state of the water environment, our view is that it is reasonable to ask developments to assist in achieving water quality objectives where they are capable of doing so.</p>
Merrow Residents Association		
	<p>Support this policy so far as it goes but far more should be done to harness rainwater from new developments for residential and commercial use. It should not run to waste.</p>	<p>Water efficiency measures, including rainwater harvesting, are covered in adopted policy D2 and proposed policies D12 and P13.</p>
Burpham Community Association		
	<p>Should be firmer – remove the word 'unacceptable' from part 1) i.e. the proposal will cause no deterioration to water quality and no impact on:</p> <p>a) the flow or quantity of groundwater; and b) the quality of surface or groundwater resources.</p>	<p>The word unacceptable has not been used in the revised policy. The criteria in the revised policy cover the criteria proposed in the comment (note: flow and quantity are a measure of ecological health and therefore form part of the WER/WFD objectives to which the policy refers).</p>
Ripley Parish Council		
	<p>Consideration needs to be given to the condition of water supply pipes and drainage systems in the settlements surrounding planned large developments such as at Former Wisley Airfield and Garlick's Arch. There are recognised existing problems with drainage in Ripley High Street due to its age, which could be</p>	<p>Proposed policy P13 and existing policy P4 address the issue of flooding. The policies require development not to exacerbate existing problems.</p>

	adversely affected by the introduction of large new developments nearby.	
Shalford Parish Council		
	The Tillingbourne River is a major source of water, particularly to the south of the borough. How will the water quality be monitored to ensure that developers are reaching the required standards?	Water quality will continue to be monitored by the Environment Agency in accordance with existing practices. The revised policy sets out criteria to ensure development assists in the achievement of water quality targets.
Portland Capital		
	With regards to the requirement for new development (likely to have an impact on underground or surface water bodies covered by the Water Framework Directive and the South East River Basin Management Plan) to contribute towards water bodies maintaining or achieving 'Good Ecological Status' Portland Capital request that this remains flexible/reviewed on site specific basis and is subject to viability to ensure this does not compromise wider residential delivery.	This point is not agreed. The WER/WFD sets a legal requirement for developments not to adversely impact the ecological or chemical status of waterbodies, and not to prohibit improvements to the status. Legislation presents very limited circumstances where harm could be allowed. Introducing flexibility that allowed harm to water quality for viability reasons would not align with legislation or national and local ambitions on biodiversity recovery. Given the poor status of the water environment, our view is that it is reasonable to require developments to assist in meeting water quality targets.
Compton Parish Council		
	Point 3 is too vague. The requirement for development that will impact on the underground and surface water courses to "contribute towards" those water bodies maintaining or achieving 'Good Ecological Status' does not go far enough. Developers should be required to fund mitigation measures in full. Simply asking for a "financial contribution" could result in a very small contribution being made.	The policy has been redrafted to set clear requirements for developments affecting waterbodies. The policy no longer references financial contributions but this could be subject to negotiation.
Ockham Parish Council		

	<p>Averse to development on flood plains and on areas near flood plains where development would exacerbate flood levels.</p> <p>Support the protection and improvement of the water environment. Want to see greater mitigation measures implemented to avoid flooding, and significant improvements to water quality within the existing water network. Policy P12 is not sufficiently robust.</p>	<p>Flood plain development is covered by national policy and policy P4 of the LPSS.</p> <p>The policy has been redrafted to make the requirements for new development clearer. Measures to avoid surface water flooding have been included in policy P13.</p>
Thames Water		
	<p>Agree with the preferred policy approach that there should be a specific policy on the key issue of the provision of water and sewerage/wastewater infrastructure to service development.</p> <p>Support Part 2 in particular as Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs).</p>	<p>This part of the policy has been removed in preparation for the Regulation 19 iteration. Policy ID1(1) and (2) require that the infrastructure necessary to support new development will be provided and available when first needed to serve the development's occupants and users and/or to mitigate its otherwise adverse material impacts. To achieve this, the delivery of development may need to be phased to reflect the delivery of infrastructure. It is therefore considered unnecessary to provide additional text in this policy.</p>
	<p>The Policy should seek to ensure sufficient infrastructure is in place to service development to avoid unacceptable impacts. We recommend the Policy include the following text:</p> <p>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</p> <p>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint</p>	<p>Policy ID1(1) and (2) require that the infrastructure necessary to support new development will be provided and available when first needed to serve the development's occupants and users and/or to mitigate its otherwise adverse material impacts. To achieve this, the delivery of development may need to be phased to reflect the delivery of infrastructure. It is therefore considered unnecessary to provide additional text in this policy.</p> <p>The paragraph of text that is recommended for inclusion is already covered within the supporting text to Policy ID1 of the LPSS at paragraph 4.6.6. It is therefore considered unnecessary to provide further text within this policy.</p>

	<p>the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</p>	
<p>Other respondents</p>		
	<p>Agree with preferred option. The borough is in an area of serious water stress. How will this problem be addressed given the extent of the planned growth?</p>	<p>Water efficiency standards in new developments are covered within policy D2 in the LPSS and proposed policy D12 and the clause in the revised water quality policy that limits high water using developments from abstracting from the environment or drawing on the public water supply.</p>
	<p>The retention and collection of rainwater in new builds is not sufficiently addressed. Water tanks and butts for houses with gardens and new ways to collect water from apartments and office buildings should be actively encouraged.</p>	<p>Measures to harvest rainwater and maximise water reuse and efficiency are covered within existing policy D2 and proposed policy D12.</p>

Policy P13 – Sustainable Drainage Systems		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey Nature Partnership		
	An improvement to the policy may be to require all (not just major) development applications to have considered feasibility for SuDS.	<p>National policy requires the use of SuDS on major developments and developments in areas at risk of flooding, but not other developments. The Lead Local Flood Authority (LLFA), Surrey County Council, has the statutory responsibility to review proposals for SuDS for major developments and the expertise to decide whether they are appropriate, but due to resource limitations will generally only do so for major schemes as per its statutory duty, though it will assist development management decisions where it is able.</p> <p>Where SuDS are delivered on minor developments outside areas of flood risk, the Council would need to judge the proposals potentially without the support of the LLFA. As the Council does not have the relevant expertise, the policy does not require or encourage the use of SuDS on these developments.</p> <p>However, the policy sets a number of sustainable drainage requirements that apply to all schemes which deliver elements of the SuDS approach, but only those that are clear enough for planning decision makers to judge without the support of the LLFA.</p>
	Mention could usefully be made of the concept of 'Natural Flood Management' in relation to SuDS.	References to Natural Flood Management have been added to the policy and supporting text.
Surrey County Council		

	Re preferred option for Policy P13: Sustainable Drainage Systems: In paragraph 1), 'lead local flood authority' should be capitalised in title case.	The policy wording has been amended to reflect this.
	It is incorrect to imply that SuDS are required by the LLFA. SuDS are required by the NPPF. The role of the LLFA is to review the proposed SuDS to ensure that the drainage is appropriate.	The supporting text has been amended to reflect this.
The Environment Agency		
	Paragraph 4.144 raises issues regarding drainage systems and potential impacts to receiving water bodies. Policy P13 does not address this issue.	Noted. The policy has been amended to include criteria to address the issue of pollution from surface water runoff. However, it should be noted that some aspects of the issue are covered by Policy P12, which covers water quality.
	In accordance with Groundwater Protection Position Statement G13, we recommend including the following statement within Policy P13: <i>"Requires use of a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater".</i>	This requirement has been included in the policy and supporting text.
	Recommend that the following statement is included to protect groundwater quality, in line with CIRIA publication C753; 'The SuDS Manual': <i>"If infiltration SuDS is the proposed methodology, requires proposals to provide evidence to show that there is at least 1 metre of vertical distance between the base of the infiltration system and the maximum likely groundwater level to ensure that the natural attenuation of any contamination being discharged is not significantly depth-limited."</i>	This requirement has been included in the policy and supporting text.
	The EA discourage the use of boreholes or other deep structures for the discharge of surface water to ground, except for clean roof water. Deep infiltration systems can significantly reduce the	A clause expecting such systems not to be used has been added. Where these are used the supporting text sets out the tests from groundwater protection position statement G1:

	potential for natural attenuation in the soils and unsaturated zone. Deep borehole soakaways may even bypass the soils and unsaturated zone altogether and can allow direct input of pollutants to groundwater, in contravention of groundwater protection position statement G1. We therefore recommend that the risk posed to groundwater quality by deep infiltration systems is addressed in the policy P13.	<ul style="list-style-type: none"> • it will not result in pollution of groundwater • there are clear and overriding reasons why the discharge cannot reasonably be made indirectly, and • there is adequate evidence to show that the increased pollution risk from direct inputs will be mitigated
	The policy should require the design of SuDS to maximise biodiversity opportunities. Where feasible, SuDS should incorporate above ground features that are designed to maximise their ecological and aesthetic value and improve water quality. Outfalls should be via open-flow routes that have minimal impact on the receiving watercourse. Set-back outfalls would reduce the loss of natural bank and impact on the natural functioning of a watercourse, providing an opportunity for additional backwater habitat to be created.	Text has been added that requires SuDS to maximise biodiversity opportunities in line with other policies in the plan. The biodiversity policies also provide a strong policy basis for SuDS to maximise biodiversity. The detailed requirements for outfalls has been added to the supporting text.
Other organisations		
Weyside Urban Village		
Policy P13 (2)	Within criterion 2, other interventions which help with drainage, e.g. permeable paving, storage tanks etc, could be included.	The policy includes a number of interventions that help with drainage including permeable surfaces. Storage tanks are covered in the SuDS sustainability hierarchy.
Cranley Road Area Residents Association		
	<p><i>“Requires development proposals to demonstrate that SuDS have been included from the early stages of site design in order to incorporate appropriate SuDS within the development.”</i></p> <p>Welcome reference to early but the policy should be explicit that the number of dwellings and layout of development cannot be established until the drainage requirements and space for water on a site have been identified.</p>	The policy requires SuDS to be implemented from the early stages of design and the supporting text includes further detail to highlight the importance of considering SuDS as part of the initial site design and layout. It also notes the importance of seeking pre-application advice from the LLFA to discuss SuDS and surface water drainage matters, and the need to consider the hydrological features that are already present on the site and to retain them. Information covering the approach must be included within the Design and Access Statement to

		demonstrate how drainage has been incorporated at an early stage of design.
Burpham Community Association		
	SuDS should always be required.	<p>National policy requires the use of SuDS on major developments and developments in areas at risk of flooding, but not other developments. The Lead Local Flood Authority (LLFA), Surrey County Council, has the statutory responsibility to review proposals for SuDS for major developments and the expertise to decide whether they are appropriate, but due to resource limitations will generally only do so for major schemes as per its statutory duty, though it will assist development management decisions where it is able.</p> <p>Where SuDS are delivered on minor developments outside areas of flood risk, the Council would need to judge the proposals potentially without the support of the LLFA. As the Council does not have the relevant expertise, the policy does not require or encourage the use of SuDS on these developments.</p> <p>The policy sets a number of requirements that apply to all schemes (not just those required to implement SuDS). These requirements deliver elements of the SuDS approach, but only those that are clear enough for planning decision makers to be able to judge compliance without the support of the LLFA.</p>
The Guildford Society		
	It is unclear where matters of overall drainage capacity are considered in Policy terms. Does reference to legislation on overall provision of adequate drainage suffice?	<p>Thames Water manages and monitors the overall network capacity within the area. Thames Water have a duty to provide the infrastructure that is required to support committed development. Policy ID1(1) and (2) in the LPSS are adopted policies that already ensure that this infrastructure is delivered as it is first needed.</p> <p>At the site scale, the policy includes requirements that ensure that development does not increase flood risk elsewhere,</p>

		which requires adequate drainage for each development. Major schemes will be subject to review by the Lead Local Flood Authority who have the relevant expertise necessary to judge whether drainage proposals are adequate. Additionally, a large number of developments are subject to Flood Risk Assessment depending on the size and location of the development site.
Shalford Parish Council		
	Planning policy should include specifications that permeable and soft surfaces should be included in all new development to maximise the collection of water in the ground and to reduce run off as much as possible.	Criteria covering this has been added to the policy.
Merrow Residents Association		
	Guildford's drainage systems are already under massive strain and Guildford is prone to serious flooding. More should be said in this policy about surface water drainage and flooding and how surface water can be harnessed to residential or commercial use.	The policy sets out a range of criteria that covers surface water flooding and drainage. It also encourages the capture and use of rainwater. The plan also includes climate change policies which address rainwater harvesting.
Residents for Guildford and Villages / Guildford Green Belt Group		
	<p>There is no requirement for non-major applications to provide SuDS on site. This is a particular issue where a number of minor developments of up to 9 dwellings are built in a particular community without the necessary drainage. The issue is particularly exacerbated in villages where existing drainage can be inadequate to deal with surface run-off, particularly during periods of heavy rainfall.</p> <p><i>Recommendation</i></p> <p>It is therefore suggested that the council would be justified in including a requirement for SuDS on minor developments (in addition to major developments) subject to negotiation with the lead local flood authority.</p>	<p>National policy requires the use of SuDS on major developments and developments in areas at risk of flooding, but not other developments. The Lead Local Flood Authority (LLFA), Surrey County Council, has the statutory responsibility to review proposals for SuDS for major developments and the expertise to decide whether they are appropriate, but due to resource limitations will generally only do so for major schemes as per its statutory duty, though it will assist development management decisions where it is able.</p> <p>Where SuDS are delivered on minor developments outside areas of flood risk, the Council would need to judge the proposals potentially without the support of the LLFA. As the</p>

		<p>Council does not have the relevant expertise, the policy does not require or encourage the use of SuDS on these developments.</p> <p>The policy sets a number of requirements that apply to all schemes (not just those required to implement SuDS). These requirements deliver elements of the SuDS approach, but only those that are clear enough for planning decision makers to be able to judge compliance without the support of the LLFA.</p>
Compton Parish Council		
	<p>The policy should be extended to ensure that SuDs schemes are required to satisfy not just technical and design requirements, but also ecological requirements. For example it is important to ensure that where water run-off will impact on an important habitat, the developer is responsible for ensuring that the quality and volume of the water does not alter the balance of the eco-system in question.</p>	<p>The policy includes criteria that address the quality of surface water runoff in order to prevent pollution. It also requires SuDS to provide biodiversity benefits and the biodiversity policies provide a strong policy basis for maximising biodiversity.</p>
West Horsley Parish Council		
	<p>Recommended additions:</p> <ol style="list-style-type: none"> 1. It would be helpful to include a hierarchy of SuDS options and their effectiveness. 2. There should be reference to Neighbourhood Plans in this section as local situations need to be carefully acknowledged and referenced. 	<p>The SuDS sustainability hierarchy produced by the LLFA has been included.</p> <p>The Development Plan is read as a whole and where a neighbourhood plan is in place its policies will be used to make planning decisions.</p>
Ripley Parish Council		
Paragraphs 4.140 – 4.141	<p>As per paras 4.140-4.141, the robustness of systems in areas surrounding proposed large new developments needs to be inspected.</p>	<p>The policy places requirements on SuDS and drainage schemes to ensure they comply with best practice and established standards. Large developments will be reviewed by the LLFA who will consider whether drainage proposals are adequate.</p>

Thames Water

It is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the new Local Plan:

“Surface water drainage - It is the responsibility of a developer to follow the sequential approach to the disposal of surface waters with proper provision for surface water draining to ground, water course or surface water sewers being given. The discharging of surface waters to the foul sewer can be a major contributor to sewer flooding and should therefore be avoided.”

The policy includes a discharge hierarchy which places discharge to combined sewer as the least favourable option and only acceptable with the agreement of the sewerage undertaker. The policy includes a number of criteria that aim to slow the rate and reduce the volume of water that is discharged from a site.

The proposed text has not been included as the supporting text sufficiently covers this point.

Policy P14: Regionally Important Geological/Geomorphological Sites		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey Nature Partnership		
	Although the topic is presently beyond the remit of the Surrey Local Sites Partnership (now incorporated within the SyNP), we support this policy as a relevant requirement of LPAs.	Noted
Historic England		
	Agree. Sites of geological/geomorphological interest are often associated with past human activity (e.g. stone quarrying, mineral extraction) and may also have inherent historic significance.	Noted
Other organisations		
Guildford Residents' Association		
	Support. Is P14 consistent with the requirements in P6 and P7?	P6 and P7 deal with biodiversity. The preferred option for policy p14 referred to impacts on biodiversity. This has been changed to impacts on "conservation interests" in new Policy P14. The new policy is consistent with the biodiversity policies.
Normandy Action Group		
	The evidence provided under 'Issues' is deficient as it ignores the locally designated Areas of Great Landscape Value [AGLV] and the policy fails to mention AGLV. AGLV is an appropriate geomorphological type (dictionary definition of Geomorphological: "of or relating to the form or surface features of the earth").	Policy P14 protects designated Regionally Important Geological/Geomorphological Sites. The protection of AGLV is outside the scope of the policy. AGLV is a landscape designation. While it is acknowledged that landscape has a relationship with geomorphological

	<p>Policy RE6 [of the Local Plan 2003] affords protection to a large AGLV area recognised as of county-wide importance for landscape character. A large proportion of this area is at some indeterminate point to be considered by Natural England for inclusion in Surrey Hills AONB. The AGLV is at risk of speculative development. The uncertainty of the AONB inclusion process suggests the community would benefit from a minimum safety net of AGLV protection through inclusion in Policy P14 as a recognised important geomorphological site.</p> <p>We propose a new paragraph in the Issues section of Policy P14 as follows in order to maintain protection for AGLV designated land: “Geomorphological sites that are valuable for their educational, scientific, historic or aesthetic importance but not otherwise determined as RIGS, specifically AGLV designated land under consideration for inclusion in Surrey Hills AONB, shall be subject of this policy, unless subsequently confirmed for inclusion in Surrey Hills AONB by Natural England and Surrey Hills AONB Board. The Council intends to protect this land in line with the protection afforded to ‘Local sites’ in LPSS Policy ID4: Green and blue infrastructure.”</p>	<p>features, the protection of landscape is not the purpose of the preferred option.</p> <p>Policy “P1 Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value” in the Local Plan strategy and sites protects AGLV at point 5 where it states “...Development proposals within the AGLV will be required to demonstrate that they would not harm the setting of the AONB or the distinctive character of the AGLV itself.”</p> <p>Natural England has confirmed that candidate areas for inclusion in the AONB cannot be granted additional status until such time as the AONB boundary review is undertaken. These areas will continue to be afforded the protection afforded by Policy P1 in the adopted LPSS.</p>
	<p>Relying on SyNP RIGS is an inadequate response in policy formation. The investigative process should spread its net more widely.</p>	<p>RIGS are identified by the Surrey RIGS group. This leads to a consistent approach across Surrey and we think this is an appropriate group to lead on the identification of RIGS.</p> <p>RIGS protection is only necessary where RIGS quality features are found outside other protective designations (e.g. SNCI, SSSI). As a result, RIGS quality features across the borough will already be subject to protection.</p> <p>The policy extends protection to unmapped features to ensure valuable RIGS assets will not be lost.</p>
<p>Guildford Society</p>		
<p>Policy Para 1)</p>	<p>Agree however in (1) the reference to biodiversity looks odd: these are geological sites.</p>	<p>The reference to biodiversity has been changed to “conservation interests”.</p>

Compton Parish Council		
	Agree. Within the Policy, it would be good to have protection for sites which are not on the Surrey RIGS Group list, but which are of equal Geological /Geomorphological interest/importance as those which have been listed.	The policy has been drafted to extend protection to unmapped features of RIGS quality.
Policy para 2)	Point 2 could be strengthened by changing “ every effort is made by the applicant to reduce harm to the conservation interests of the Regionally Important Geological/Geomorphological Site through avoidance and mitigation measures” to “the applicant should reduce harm to the conservation interests of the Regionally Important Geological/Geomorphological Site through avoidance and mitigation measures.”	The wording has been revamped to improve effectiveness and now refers to “every effort” to “prevent” and “minimise” harm.
Burpham Neighbourhood Forum		
	The post codes for each RIGS site should be added to help people find them.	The locations of the RIGS will be shown on the policies map.
Other respondents		
Policy para 1)	In (1) the reference to biodiversity looks odd: these are geological sites.	The reference to biodiversity has been changed to “conservation interests”.
	Is this consistent with P6 and P7?	P6 and P7 deal with biodiversity. The preferred option for policy P14 referred to impacts on biodiversity. This has been changed to impacts on “conservation interests” in new Policy P14. The new policy is consistent with the biodiversity policies.

Policy D4 Achieving high quality design and local distinctiveness		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		
	Agree; requiring good design is inextricably linked with understanding and respect for character and distinctiveness, and the defining characteristics of each part of the plan area would be reinforced in the approach to design proposed.	Noted.
Other organisations		
Guildford Society		
	<ol style="list-style-type: none"> 1. Policy should reference the use of the South East Design Panel 2. Needs considerable strengthening on matters of consultation and links to Neighbourhood plans 3. Consideration of the forthcoming Building Better Building Beautiful Commission report when released if timing allows 4. Blanket policy G5 of the 2003 plan should be included in the LPDMP 5. Policy needs to have more hard limits that are only broken in exceptional circumstances (this particularly applies to DPHa see proposals under Question 1) 	<ol style="list-style-type: none"> 1. LPSS Policy D1 references the use of Design Review Panel 2. The policy states that development proposals must have regard to relevant national and local guidance. The supporting text will clarify that this includes any relevant neighbourhood plans. 3. The policy states that development proposals must have regard to relevant national and local guidance – this will future proof it as it will capture anything published or adopted after the LPDMP is adopted. 4. The content is considered to be covered by the suite of policies included in the LPSS and the emerging LPDMP. These policies have also been prepared in accordance with the NPPF and National Design Guide. 5. It is not reasonable and in many cases not possible to have such hard limits on aspects of design where there are many interdependent considerations which

		<p>must be considered together on a case by case basis. In relation to density – appropriate density is an outcome of design-led approach that considers a range of factors particular to the site in question and its context and results in high quality development. Inappropriate density is one that has not considered these factors.</p>
Design Standards (2)	Respect for ‘Landmark Buildings’ in G5(1) 2003 is replaced by understanding of ‘features of interest’ which is perhaps weaker.	Features of interest is considered to be more appropriate as it covers of broader range of built and natural features, including landmark buildings. The policy has been amended to refer to built and natural features of interest.
Character of Development (7)	Reference to paragraph 1.1.3 of the Strategic Development Framework – SPD	The supporting text refers to the SDF SPD as one of the relevant design guidance that development proposals should have regard to.
Character of Development (7e)	<ol style="list-style-type: none"> 1. The very clear statement of 2003 Policy G5(6) that views are protected etc. should be include in the LPDMP. The word ‘respond’ in 7e does not carry the force of the wording in 2003 Policy G5(6): the wording of G5(6) should be included in the new Policy 2. Not clear how smaller sites are covered by this element of the policy 	<ol style="list-style-type: none"> 1. The supporting text refers to the Guildford Town Centre Views SPD as one of the relevant design guidance that development proposals should have regard to. This provides guidance on how to manage change in key views with the aim to retain the character of Guildford and what makes its special, including the ability to appreciate key heritage assets, and to understand the relationship of Guildford with its landscape setting. The word “protect” implies that there would be no change. The policy also requires that development proposals must demonstrate a clear understanding of and respond positively to significant views and the topography of a site. LPSS Policy S3(5) requires development in the town centre to have regard to important views. 2. All sizes of site will need to have regard to views and topography acknowledging however that it is likely that larger schemes would have more of a potential impact.

	<p>Incorporate more ambitious standards to ensure mass, scale and basic amenity are incorporated, suggestions made include</p> <ul style="list-style-type: none"> • Private internal space • Private outside space • Spatial quality • Aspect and outlook • Spacing • Mass as part of views • Sustainable design • Height 	<p>The desired outcome is high quality design – it is considered more effective that the policy includes the qualitative considerations and requirements that we think are imperative in achieving this. The setting of quantitative standards may not always deliver these outcomes nor will they likely be appropriate/justified in all circumstances. Where it is considered that quantitative standards deliver a desired outcome then these have been set out in policy e.g. minimum space standards and balcony size.</p>
Taylor Wimpey		
	<p>Supports alternative option of being assessed against Local Plan Strategy & Sites 2019, NPPF, National Design Guide and PPG and where relevant the Strategic Design Codes</p> <ol style="list-style-type: none"> 1. Policy D1 in the Local Plan (2019) ensures a comprehensive design process for development in the borough. Therefore, highly prescriptive policy that has the potential to contradict other planning policy and can become a hinderance that impacts negatively on design as opposed to assist. 2. Questions over duplicity with Policy D1 and the SDF SDP and consider that this policy should not be applicable to strategic sites 	<p>It is considered that D4 provides additional detail to Policy D1 and complements the National Design Guide which was published after adopted of the LPSS. Whilst there may be an element of overlap between D1/D4 and the SDF SPD this is not considered to be an issue so long as there are no contradictory requirements. It is considered that they are consistent with each other as the SDF SPD takes the policy further by providing site specific design principles. Reference to the SDF SPD has been added to the supporting policy.</p>
General Principle (4)	<p>Consider this is already addressed in Policy D1 & SDF SPD with the suggestion that it is removed and added to the supporting text.</p>	<p>Policy D1 and the SDF SPD only refer to this in relation to strategic sites. This policy requirement is applicable to all sites not just the strategic sites, some of which are in multiple ownership.</p>
Bridge End Farm, Ockham		
General Principle (4)	<p>Consider this is already addressed in Policy D1 & SDF SDP with the suggestion that it is not appropriate or necessary for inclusion</p>	<p>Policy D1 and the SDF SPD only refer to this in relation to strategic sites. This policy requirement is applicable to all sites not just the strategic sites, some of which are in multiple ownership.</p>

Holy Trinity Amenity Group		
	<p>Concerns about the cumulative impact of incremental development – Suggestions made:</p> <ul style="list-style-type: none"> • applications in established areas are not to be considered in isolation the test will be whether the change would be acceptable if implemented on every property • embodied energy to be considered in a quantitative way and must be related to a stated design life of the building 	<p>Each planning application must be assessed on its own merits. Embodied carbon is addressed in emerging Policy D12.</p>
Send Parish Council		
	<ol style="list-style-type: none"> 1. Policy needs to ensure that the full spec provided in the 2003 policy is carried forward into the new ones 2. Reference to Neighbourhood Plans, the existing built form and consideration of space around buildings 	<ol style="list-style-type: none"> 1. The content is considered to be covered by the suite of policies included in the LPSS and the emerging LPDMP. These policies have also been prepared in accordance with the NPPF and National Design Guide. 2. The policy states that development proposals must have regard to relevant national and local design guidance. The supporting text clarifies that this includes neighbourhood plans. The policy requires an understanding of the surrounding context and references the form and scale of buildings and spaces.
Weyside Urban Village		
	<ol style="list-style-type: none"> 1. High quality design can respect local character without necessarily directly reflecting it 2. Should be a reference to push for innovation in house types to help achieve housing numbers on higher density sites and provide sustainable and flexible accommodation 	<p>It is considered important that sites have a clear understanding, and respond positively to, the local context. This does not imply that it is necessary to replicate it in all instances. For strategic sites such as WUV, it is considered that this is addressed through LPSS Policy D1(5) which states: <i>Given the size, function and proposed density of the strategic allocations it may not always be desirable to reflect locally distinct patterns of development. These sites must</i></p>

		<p><i>create their own identity to ensure cohesive and vibrant neighbourhoods.</i></p> <p>The policy has been amended to indicate that increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting.</p>
Character of Development (7a)	Could be read as requiring new development to follow established street patterns etc, and it is possible to do so by presenting a new pattern of development	<p>As a general principle it is considered important that developments respond and reinforce locally distinct patterns of development however for strategic sites such as WUV LPSS Policy D1(5) is also applicable.</p> <p>The policy has been amended to read 'responds positively to'</p>
Design Standards (6)	Should reference existing residents in the surrounding area as well as new occupants of a development	This part of the policy has been deleted as it is already covered by Policy D1(9)
The Woodland Trust		
	<p>Would like to see them expanded to reflect the importance of natural elements in the built environment. Have made the following suggestions</p> <ol style="list-style-type: none"> 1. Incorporation of existing trees, hedgerows and other important natural features (5h) 2. Make a positive contribution to the natural environment (6d) 3. development proposals should incorporate the protection and extension of green infrastructure such as tree lines and hedgerows, to enhance overall environmental quality, frame built elements and connect existing habitats (7g) 	These aspects are all covered by the emerging biodiversity policies. The plan needs to be read as a whole.
Martin Grant Homes		

	Should acknowledge that the amount of detail in term of design will need to be appropriate to the type of planning application.	Only those policies that are relevant to the type and detail of application submitted would be relevant in the decision making process. It is not considered necessary to acknowledge this in the policy as this will be applicable across many policies in the plan.
Hallam Land Management Ltd		
	<ol style="list-style-type: none"> 1. Questions the need for further Development Management Policy concerning design in the case of the Strategic Sites given the existence of the SPD 2. Suggests recognition in the supporting text of this fact 	It is considered that D4 provides additional detail to Policy D1 and complements the National Design Guide which was published after adopted of the LPSS. Whilst there may be an element of overlap between D1/D4 and the SDF SPD this is not considered to be an issue so long as there are no contradictory requirements. It is considered that they are consistent with each other as the SDF SPD takes the policy further by providing site specific design principles. Reference to the SDF SPD has been added to the supporting policy.
Design Standard (4)	Considers that this is addressed in the SPD in the case of the strategic sites	Policy D1 and the SDF SPD only refer to this in relation to strategic sites. This policy requirement is applicable to all sites not just the strategic sites, some of which are in multiple ownership.
Cranley Road Area Residents Association		
	<ol style="list-style-type: none"> 1. Policy should specify green approaches along transport routes and edge of settlement 2. The following should be captured in the policy <ul style="list-style-type: none"> • Spacing between buildings to allow for green features • Management of building heights to respect topography and views 	The policy requires that development proposals demonstrate a clear understanding of, and respond positively to, issues such as significant views, and surrounding landscape and topography, and that these factors inform a proposals' form and scale, and landscaping.
Character of Development	<ol style="list-style-type: none"> 1. Should also refer to the importance of views into and out from settlements more general 	The policy requires that development proposals demonstrate a clear understanding of, and respond positively to, issues such as significant views, and surrounding landscape and

(7e)	2. The significance of the roofscapes given Guildford topography	topography, and that these factors inform a proposals' form and scale – this includes heights and roofscapes.
Guildford Residents' Association		
	<ol style="list-style-type: none"> 1. Recommend specific mention of Nationally Described Space Standards as a way of dealing with minimum space requirements 2. Reference to Neighbourhood Plans & Council Landscape and Townscape Character Assessments as relevant considerations 	<ol style="list-style-type: none"> 1. This is already required as part of LPSS Policy H1 2. The policy states that development proposals must have regard to relevant national and local design guidance. The supporting text clarifies that this includes neighbourhood plans and the LCA.
Design Standards (1)	Consider that the wording could be usefully strengthened by changing 'have regard to' to 'comply with'	'have regard to' is considered more appropriate as there are not necessarily hard 'rules' that development proposals 'need to comply with' – instead there are numerous factors that need to have been considered and responded to at each stage of the design process
West Horsley Parish Council		
	<ol style="list-style-type: none"> 1. Needs to ensure that the full spec provided in the 2003 policies is carried forward into these new ones. 2. Reference to the existing build form and consideration to space around buildings 	<ol style="list-style-type: none"> 1. The content is considered to be covered by the suite of policies included in the LPSS and the emerging LPDMP. These policies have also been prepared in accordance with the NPPF and National Design Guide. 2. The policy requires that development proposals demonstrate a clear understanding of, and respond positively to, issues such as surrounding context and prevailing character. The policy requires that a design led approach is demonstrated at all stages of the design process – this includes when considering the site's layout, and the form and scale of its buildings and spaces.

Design Standards (1)	Suggested reference to Neighbourhood Plans	The policy states that development proposals must have regard to relevant national and local design guidance. The supporting text clarifies that this includes neighbourhood plans.
Character of Development (7e)	Suggested reference to strategic views in Neighbourhood Plans and views noted in AONB/Surrey Hills Management Plans	The policy states that development proposals must have regard to relevant national and local design guidance. The supporting text clarifies that this includes neighbourhood plans. Adopted neighbourhood plans are already part of the development plan – it is not considered necessary or appropriate to specifically reference one single policy aspect that may or may not be contained in adopted neighbourhood plans. LPSS Policy P1 already provides a policy hook for the AONB Management Plan.
Compton Parish Council		
	Would like to see vernacular design encouraged in traditional Surrey/village settings	The policy requires high quality design which contributes to local distinctiveness by demonstrating a clear understanding of, and responding positively to, issues such as surrounding context and prevailing character. The supporting text refers to vernacular design.
Character of Development (7e)	Could be widened to include views into and out of open countryside	The policy requires that development proposals demonstrate a clear understanding of, and respond positively to significant views (to and from the site)
Burpham Community Association		
	Suggest that for major developments this should be subject to local consultation not just council approval.	Consultation with local residents and other stakeholders forms part of the planning application process.
Merrow Residents' Association		

	Suggests that there are likely to be some interesting design challenges to the traditional concept and local distinctiveness when it comes to low energy sustainable building initiatives e.g. Passivehaus & LETI	The policy has been amended to provide support to the appropriate use of innovative materials and construction techniques.
East Clandon Parish Council		
	Needs to ensure that the full spec provided in the 2003 policies is carried forward into these new ones.	The content is considered to be covered by the suite of policies included in the LPSS and the emerging LPDMP. These policies have also been prepared in accordance with the NPPF and National Design Guide.
Design Standards (1)	Suggested reference to Neighbourhood Plans	The policy states that development proposals must have regard to relevant national and local design guidance. The supporting text clarifies that this includes neighbourhood plans.
Character of Development (7e)	Suggested reference to strategic views in Neighbourhood Plans and views noted in AONB/Surrey Hills Management Plans	Adopted neighbourhood plans are already part of the development plan – it is not considered necessary or appropriate to specifically reference one single policy aspect that may or may not be contained in adopted neighbourhood plans. LPSS Policy P1 already provides a policy hook for the AONB Management Plan.
Portland Capital		
	<ol style="list-style-type: none"> 1. Encourage uplift in densities in appropriate locations by recognising minimum density ranges 2. In the context of historic under delivery, as per point C of NPPF paragraph 123; site size, urban grain and context should be reviewed on a site by site basis, with a flexible approach to daylight and sunlight, where it would inhibit making efficient use of a site. 3. Policy is conflicting in that it seeks to ensure development respects and responds to history of place and surrounding 	<ol style="list-style-type: none"> 1. The policy has been amended to indicate that increased densities may be appropriate if would not have a detrimental impact on an area's prevailing character and setting. 2. NPPF para 123(c) relates to the decision making process and does not suggest that policies should include a flexible approach to these matters. 3. The policy has been amended to say that the use of innovative design approaches, including use of

	<p>context while also encouraging sites to consider the opportunity to create site specific identities</p> <p>4. Policy should include greater flexibility to allow development of higher densities to come forward in appropriate locations and not preclude appropriate innovation</p>	<p>materials and construction techniques, will be supported where this presents an opportunity to create new or complementary identities that contributes to and enhances local character.</p> <p>4. The policy has been amended to provide support for increased densities if it would not have a detrimental impact on an area's prevailing character and setting.</p>
Reach Plc		
	<p>1. Approach needs to balance achieving high quality design and delivering schemes which are viable thus a need for flexibility</p> <p>2. Suggestion that the general principles should be applied, subject to site and development specific issues</p> <p>3. Principles such as form scale and massing should be considered and applied in the round</p>	<p>High quality design can and should be delivered on all sites. The policy is not overly prescriptive and instead requires that development proposals take account of all relevant factors which taken together contribute to good design. Each site will be considered on its own merits.</p>
East Horsley Parish Council		
Design Standards (1)	Suggested reference to Neighbourhood Plans	The policy states that development proposals must have regard to relevant national and local design guidance. The supporting text clarifies that this includes neighbourhood plans.
Ockham Parish Council		
	<p>Policy should deliver high quality design that supports the context and the setting only and does not create inappropriate density, change of identity or change the landscape, leading to loss of rural views</p>	<p>The policy requires that development proposals to demonstrate a clear understanding of, and respond positively to, issues such as surrounding context however this needs to be considered alongside LPSS Policy D1(5) which is applicable to strategic sites. The policy has been amended to indicate that increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting.</p>
Effingham Parish Council		

	In semi-rural and rural areas hedges may be better than wooden/metal fences and metal fences to facilitate wildlife movement – except where unkempt hedges may restrict paths/pavements	This matter is addressed by the emerging Policy P6.
Downsedge Residents' Association		
	National Design Guide should not be used as a reference for protecting character of existing settlements. Should either use the LCA (2007) or a new SPD	The National Design Guide outlines and illustrates the Government's priorities for well-designed places. It provides the overarching principles that deliver high quality places. The policy states that development proposals must have regard to relevant national and local design guidance. The supporting text clarifies that this includes the LCA.
Design Standards (2)	Clear distinction should be made between the aim of maintaining character in existing settlements and potentially creating a 'new identity' in allocated and strategic sites where desirable.	The policy has been amended to say that support will be given to the opportunity to create new or complementary identities where these contribute to and enhance local character.
Sport England		
	Policy D1 refers to Building For Life guidance (updated to Building for a Healthy Life 2020) whereas D4 refers to National design Guide – not clear which takes precedence.	Neither takes precedence – they need to be considered together. It is considered that both sets of design guidance are complementary. The updated Building for a Healthy Life 2020 shows the relationship between it and the NPPF and NDG. The policy states that development proposals must have regard to relevant national and local design guidance. The supporting text clarifies that this includes Building for a Healthy Life 2020.
	Policy should refer to new developments embodying the principles of Active Design (October 2015), which is a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing.	The policy states that development proposals must have regard to relevant national and local design guidance. The supporting text clarifies that this includes Sport England guidance.
Burpham Neighbourhood Forum		

6(a)	Should include reference to meeting current guidelines	This part of the policy has been deleted as it is already covered by Policy D1(9). Accessibility standards are set by Building regs.
Residents for Guildford and Villages / Guildford Green Belt Group		
	Do not agree. The policy should be split to cover each aspect separately (high quality design/ local distinctiveness)	Maintaining and contributing to local distinctiveness is achieved through the provision of development that reflects high quality design. These two aspects are considered to be inter-related and must be considered together at each stage of the design process. The policy has been amended to make this linkage clearer.
	Para 5.16 refers to the requirement of a thorough analysis and assessment of the context and character of areas in development proposals within the Borough. This analysis and assessment should be undertaken by the Council with input from communities and set standards for applicants to follow. This would create a baseline rather than a subjective approach that is retrofitted to justify proposals.	The policy states that development proposals must have regard to relevant national and local design guidance. This would include any subsequent guidance prepared by the Council.
	Policy unclear/ambiguous. Para (2) requires demonstration of an understanding of local character however (3) and (5) states that sites should create their own identifies.	It is considered important that sites have a clear understanding, and respond positively to, the local context. The policy has been amended to say that support will be given to the opportunity to create new or complementary identities where these contribute to and enhance local character.
	The general principles of the design standards as set out within the preferred option for policy D4 should be expanded to show proper understanding of the breadth of design requirements as recognised by national policy (10 characteristics in the National Design Guide).	The policy has been amended to require the achievement of the 10 characteristics of well-designed places.

	NPPF requires design policies should be developed with local communities. Policy should include reference to Neighbourhood Plans and community-led design	The emerging plan is subject to a number of public consultations where the views of the community are sought. Additionally, the plan has been prepared with the involvement of councillors who represent their local communities. The policy states that development proposals must have regard to relevant national and local design guidance. The supporting text clarifies that this includes neighbourhood plans.
	Should contain a requirement for all applications (beyond householder applications) to engage with the Design Review Panel or local community as part of the planning process.	LPSS Policy D1(16) sets the Council's expectation on the use of Design review Panel for larger schemes. The Council's Statement of Community Involvement sets out the expectations for community involvement as part of the planning application process.
	LPDMP should contain minimum technical housing standards as an appendix.	LPSS Policy H1 already requires that developments meet the minimum space standards.
Other respondents		
	It is important that the principles are binding. Please include reference to the Nationally Described Space Standards.	LPSS Policy H1 already requires that developments meet the minimum space standards.
	Helpful if the overall policy could be explicit that the principles refer to both the rural villages as well as the town centre.	The policy is applicable to all new development, irrespective of location.
	The blanket Policy G5 of the 2003 Plan should be included in the LPDMP	The content is considered to be covered by the suite of policies included in the LPSS and the emerging LPDMP. These policies have also been prepared in accordance with the NPPF and National Design Guide.
Design Standards (2)	Respect for 'Landmark Buildings' in G5(1) 2003 is replaced by understanding of 'features of interest' which is perhaps weaker.	Features of interest is considered to be more appropriate as it covers of broader range of built and natural features, including landmark buildings. The policy has been amended to refer to built and natural features of interest. Buildings may be further protected by the various heritage policies.

Character of Development (7e)	'Respond' should be amended to 'respect' or 'protect'	The supporting text refers to the Guildford Town Centre Views SPD as one of the relevant design guidance that development proposals should have regard to. This provides guidance on how to manage change in key views with the aim to retain the character of Guildford and what makes its special, including the ability to appreciate key heritage assets, and to understand the relationship of Guildford with its landscape setting. The word "protect" implies that there would be no change. The policy also requires that development proposals must demonstrate a clear understanding of and respond positively to significant views and the topography of a site. LPSS Policy S3(5) requires development in the town centre to have regard to important views.
	To view design in the long term with emphasis on the use of sustainable material as opposed to manmade	This is addressed through emerging Policy D12.
	Include a requirement to provide a 'Design Statement' for each significant development which clearly demonstrates an understanding of its context and surroundings with an appreciation of local materials, detail and forms and massing.	<p>A Design and Access Statement (DAS) is required for all major developments (10 or more units) and all schemes in conservation areas that comprise at least one dwelling or 100sqm of commercial floorspace. The DAS must:</p> <ul style="list-style-type: none"> • explain the design principles and concepts that have been applied to the development; • demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account

Policy D5: Privacy and Amenity		
Paragraph	Main Issue Summary	GBC Response
Other organisations		
Guildford Society		
	Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of visual and acoustic privacy in relation to neighbouring property, the street and other public spaces.	The supporting text addresses this point.
Taylor Wimpey		
(2)	<p>Suggested amendment: 2) ensure developments <u>encourage private, semi-private and public outdoor amenity space</u>". maximise opportunities for provision of private outdoor amenity space,</p> <p>This is will ensure that the issue is addressed as a whole across sites, but other areas (such as public amenity space, other public spaces, density) and design are not compromised on the basis of private amenity space provision.</p>	Private outdoor amenity space is considered to make an important contribution to residents' quality of life, highlighted during the COVID pandemic. However, it is acknowledged that shared amenity can play an important role particularly in denser forms of development where opportunities for private amenity space may be more limited. The policy has been amended to list the key considerations necessary to ensuring that any type of amenity space provided is well-designed and fit for purpose.
Holy Trinity Amenity Group		
	Clarification of what level of overlooking is unacceptable.	It is not considered appropriate or necessary to prescribe set standards. The level of overlooking will be influenced by a number of factors. These will be assessed instead on a case by case basis as part of consideration of wider site design.
Send Parish Council		

	<ul style="list-style-type: none"> • Clarity around the use of extensive glazing and the impact on protected areas, whilst also protecting the privacy of occupiers is also required within this policy. • Needs reference to respecting and protecting dark skies. • Boundary treatments should reflect the local character and blend in with the existing landscape setting. 	The policy requires consideration of the living environment of existing residential properties as well as the living conditions of new properties, including in relation to matters such as privacy and artificial lighting. Emerging Policy D10a addresses issues to do with light impacts and light pollution whilst other design policies ensure that development responds positively to local character and the landscape setting.
Savills obo Weyside Urban Village		
	Policy should not include minimum garden depths. Should acknowledge that there are other options to providing alternative amenity space (e.g. First floor terraces) in higher density development	The Policy does not prescribe minimum garden sizes but does list the key considerations necessary to ensuring that any type of amenity space provided is well-designed and fit for purpose. The supporting text clarifies that amenity space can take different forms depending on the form of housing.
Cranley Road Area Residents Association		
	Should refer to development being sensitive to established building lines	This matter is addressed in emerging Policy D4.
Guildford Residents' Association		
	Should include minimum standards for external amenity	The desired outcome is high quality design and amenity space that is useable and fit for purpose – it is considered more effective that the policy includes the qualitative considerations and requirements that we think are imperative in achieving this. The setting of quantitative standards may not always deliver these outcomes nor will they likely be appropriate/justified in all circumstances. Where it is considered that quantitative standards deliver a desired outcome then these have been set out in policy e.g. minimum space standards and balcony size.
West Horsley Parish Council		

	<ul style="list-style-type: none"> • Clarity around the use of extensive glazing and the impact on protected areas, whilst also protecting the privacy of occupiers is also required within this policy. • Needs reference to respecting and protecting dark skies. • Boundary treatments should reflect the local character and blend in with the existing landscape setting. 	<p>The policy requires consideration of the living environment of existing residential properties as well as the living conditions of new properties, including in relation to matters such as privacy and artificial lighting. Emerging Policy D10a addresses issues to do with light impacts and light pollution whilst other design policies ensure that development responds positively to local character and the landscape setting.</p>
<p>Burpham Community Association</p>		
	<p>Must include the Neighbourhood Plan off-street parking space requirements (which are concerned with the amenity value for neighbours).</p>	<p>Neighbourhood Plans are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with. So replication in the LP would not appear to be necessary.</p> <p>Emerging Policy ID11 does however defer to adopted neighbourhood plan parking policies outside of strategic sites.</p>
<p>Merrow Residents' Association</p>		
	<p>Should include minimum standards for external amenity</p>	<p>The desired outcome is high quality design and amenity space that is useable and fit for purpose – it is considered more effective that the policy includes the qualitative considerations and requirements that we think are imperative in achieving this. The setting of quantitative standards may not always deliver these outcomes nor will they likely be appropriate/justified in all circumstances. Where it is considered that quantitative standards deliver a desired outcome then these have been set out in policy e.g. minimum space standards and balcony size.</p>
<p>East Clandon Parish Council</p>		

	<ul style="list-style-type: none"> • Clarity around the use of extensive glazing and the impact on protected areas, whilst also protecting the privacy of occupiers is also required within this policy. • Needs reference to respecting and protecting dark skies. • Boundary treatments should reflect the local character and blend in with the existing landscape setting. 	<p>The policy requires consideration of the living environment of existing residential properties as well as the living conditions of new properties, including in relation to matters such as privacy and artificial lighting. Emerging Policy D10a addresses issues to do with light impacts and light pollution whilst other design policies ensure that development responds positively to local character and the landscape setting.</p>
<p>Guildford Vision Group</p>		
	<p>Question whether elements listed in 3) of 'factors to be considered', sit appropriately alongside the Air Quality Policy?</p>	<p>These factors can have an impact on people's amenity which is separate to the issue of air quality.</p>
<p>Residents for Guildford and Villages / Guildford Green Belt Group</p>		
	<p>Unclear how factors of bin and bike storage (4) and provision and access to electrical vehicle charging points (5) would impact upon amenity. These did not form part of the previous policy G1(3) which dealt with Protection of amenities enjoyed by occupants of buildings. These are nevertheless important factors and would actually benefit from their own policies but have no place within policy D5 and should be removed.</p>	<p>Agreed. Policy D5 has been amended to focus solely on the protection of amenity and the provision of amenity uses. A new policy (Policy D5a) has been created which now deals with visual amenity related to external servicing features and stores.</p>
	<p>Need to set minimum standards for amenity space as Waverley has done - minimum of 20 square metres to be provided per dwelling, or in the case where a private balcony is provided then this can be reduced to 15 square metres.</p>	<p>The desired outcome is high quality design and amenity space that is useable and fit for purpose – it is considered more effective that the policy includes the qualitative considerations and requirements that we think are imperative in achieving this. The setting of quantitative standards may not always deliver these outcomes nor will they likely be appropriate/justified in all circumstances. Where it is considered that quantitative standards deliver a desired outcome then these have been set out in policy e.g. minimum space standards and balcony size.</p>

	Policy should include reference to boundary treatments and landscaping which can both impact on amenity. This should not be left to conditions.	Landscaping (which includes boundary treatments) is covered by emerging Policy D4.
Cllr Ruth Brothwell		
	There should be minimum separation distances between properties	The desired outcome is high quality design and amenity space that is useable and fit for purpose – it is considered more effective that the policy includes the qualitative considerations and requirements that we think are imperative in achieving this. The setting of quantitative standards may not always deliver these outcomes nor will they likely be appropriate/justified in all circumstances. Where it is considered that quantitative standards deliver a desired outcome then these have been set out in policy e.g. minimum space standards and balcony size.
	The policy should protect existing green landscaping features	Emerging Policy D4 requires that development responds positively respond to the surrounding context, prevailing character and landscape.
Downsedge Residents' Association		
	Need to set minimum standards for amenity space as Waverley has done - minimum of 20 square metres to be provided per dwelling, or in the case where a private balcony is provided then this can be reduced to 15 square metres. There should be minimum separation distances between properties	The desired outcome is high quality design and amenity space that is useable and fit for purpose – it is considered more effective that the policy includes the qualitative considerations and requirements that we think are imperative in achieving this. The setting of quantitative standards may not always deliver these outcomes nor will they likely be appropriate/justified in all circumstances. Where it is considered that quantitative standards deliver a desired outcome then these have been set out in policy e.g. minimum space standards and balcony size.
Ockham Parish Council		

	Large scale housing developments on designated strategic sites will conflict with this policy.	Issues of maintaining privacy and amenity where residential development edges a strategic site will need to be considered as part of the masterplanning process.
East Horsley Parish Council		
	Since boundary screening is an important element for ensuring neighbouring privacy, we suggest it would be helpful to include this item within the list of supporting criterion, potentially with encouragement for green boundary solutions.	The policy lists the various factors that can have an adverse impact on new or existing residents' amenity – design solutions that might help mitigate these impacts are covered through emerging Policy D4.
Other respondents		
	Should include minimum standards for external amenity. Should include minimum standards on adequate space between properties.	The desired outcome is high quality design and amenity space that is useable and fit for purpose – it is considered more effective that the policy includes the qualitative considerations and requirements that we think are imperative in achieving this. The setting of quantitative standards may not always deliver these outcomes nor will they likely be appropriate/justified in all circumstances. Where it is considered that quantitative standards deliver a desired outcome then these have been set out in policy e.g. minimum space standards and balcony size.
	This policy should also consider the issue at the demolition/construction phase	This policy is only concerned with the amenity impact of the proposal once it is built. Amenity issues that may occur during the construction phase are covered by separate Environmental Health legislation. The supporting text clarifies this point.
	Developments should be built with communal bins	Policy D5 has been amended to focus solely on the protection of amenity and the provision of amenity uses. A new policy (Policy D5a) has been created which now deals with visual amenity related to external servicing features and stores such as bins.

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Policy D6: Shopfront Design		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		
	Would benefit from supporting design advice in the form of supplementary planning guidance as they can have significant impacts, individually and cumulatively, on local character and distinctiveness of sensitive areas, such as Guildford high street and village centres.	It is agreed that there is merit in providing additional guidance on this topic however this will be contained in a future SPD which is outside the scope of the LPDMP process. Not making reference to the SPD in the LPDMP does not preclude an SPD being produced, nor lessen the weight that can be applied to it.
Other organisations		
Cranley Road Area Residents Association		
	Should set out that acrylic facing across frontages will be resisted	It would be unreasonable for the policy to stipulate the prevention of acrylic. Its acceptability is dependent on context and purpose, so there may be occasions where its use is acceptable. Therefore, the policy will seek to stipulate that the design of shopfronts are designed to a high quality, that is responsive to character and context and utilises sustainable materials.
Guildford Society		
	The 2003 Policy G7 has a clause on respect for local character, this is missing from the new Policy.	Agreed – The policy has been amended to provide additional emphasis on local distinctiveness and contextual design. This is achieved by: <ul style="list-style-type: none"> • Citing that shopfronts are required to be designed to a high quality that is responsive to or enhances the character and appearance of their surrounding context.

		<ul style="list-style-type: none"> • Having an expectation that their design retains or relates well to the proportion, scale, detailing, period and character of the host building as a whole and the wider street setting. • Expecting that shopfronts that contribute positively to the established character and appearance of the building they form part of, or the surrounding context to be retained. • Expecting the retention of original features and details where they are of architectural or historic interest, or where they contribute to the character and appearance of the street scene.
	<p>There should be a reference to the GBC Guidance on Shopfront Design and Security in Historic areas.</p>	<p>It is agreed that there is merit in providing additional guidance on this topic, however this will be contained in a future SPD which is outside the scope of the LPDMP process. Not making reference to the SPD in the LPDMP does not preclude an SPD being produced, nor lessen the weight that can be applied to it.</p>
	<p>There needs to be an addition to the policy to cover shops that are converted to other uses and how are blank facades going to be managed.</p>	<p>With regards to the comment about shop conversions the policy has been amended to include the term alteration which will cover this type of work. In making this adjustment the policy now sets out that alterations</p> <ul style="list-style-type: none"> • Are expected to use high quality materials; and • That they are of a design that retains, or relates well to a number design/architectural attributes of the host building as well as the wider street scene <p>The policy now also specifically identifies the retention/restoration of shopfronts that positively contribute to the established character and appearance of a building or surrounding context which will equally be applicable in case of conversion.</p>

		<p>With regards to the management of blank facades, this is another reasonable suggestion, and as such the policy has been refined to ensure that there expectation for shopfronts to present an active frontage to the street scene at all times.</p> <p>In both instances we feel additional guidance will be able to be provided in a future SPD, but this is outside the scope of the LPDMP process.</p>
Holy Trinity Amenity Group		
	<p>Control has been greatly helped by detail requirements given in the SPG “Shopfront Design” which needs to be kept / updated. The plan must state that shopfronts, at least in Conservation Areas, follow the detail of the associated SPG/SPD.</p>	<p>It is agreed that there is merit in providing additional guidance on this topic, however this will be contained in a future SPD which is outside the scope of the LPDMP process. Not making reference to the SPD in the LPDMP does not preclude an SPD being produced nor lessen the weight that can be applied to it.</p>
West Horsley Parish Council		
	<p>Policy should refer to the need to respond to local character and setting and respect the character and style of the existing building</p>	<p>Agreed – The policy has been amended to provide additional emphasis on local distinctiveness and contextual design. This is achieved by:</p> <ul style="list-style-type: none"> • Citing that shopfronts are required to be designed to a high quality that is responsive to or enhances the character and appearance of their surrounding context. • Having an expectation that their design retains or relates well to the proportion, scale, detailing, period and character of the host building as a whole and the wider street setting. • Expecting that shopfronts that contribute positively to the established character and appearance of the building they form part of, or the surrounding context to be retained.

		<ul style="list-style-type: none"> • Expecting the retention of original features and details where they are of architectural or historic interest, or where they contribute to the character and appearance of the street scene.
Burpham Community Association		
	<p>Need a coherent style or options guide which over-rides each shop or companies desire for their own standard</p>	<p>The suggestion of a coherent style and options guide is not appropriate. Nevertheless, it is considered that companies imposing their own standards upon shop designs can be successfully managed by covering the following within the policy.</p> <ul style="list-style-type: none"> • Design being responsive to the architectural form and design of the host building and wider street setting • Setting out the key architectural components for good shopfront design • Ensuring that features and details of historic or architectural interest are retained
Compton Parish Council		
	<p>Should avoid vibrant colours on the High Street altogether, and instead opt only for neutral tones, which are more in keeping with a historic town centre.</p>	<p>It would be unreasonable for the policy to stipulate such matters, acceptability is entirely dependent upon context. However additional guidance on this matter could be included within an SPD, which we agree there would be merit in providing, however this is outside the scope of the LPDMP process.</p> <p>Notwithstanding the above, the policy stipulates that the design of shopfronts are designed to a high quality, that is responsive to character and context and utilises sustainable materials.</p>

Burpham Neighbourhood Forum		
Policy para (3)	Please define 'shop front'. E.g. please be aware, shop entrances can be to the side or 'back' or have multiple entrances. Should all entrances have easy access for all or just one of multiple entrances?	Noted – A definition is to be provided as part of the supporting text. The supporting text will also cover the requirement for all new and replacement shopfronts to incorporate a Best Practice approach to access and inclusion, including compliancy with part M of Schedule 1 to the Building Regulations 2010.
Worplesdon Parish Council		
	Needs to include lighting and control of lighting.	The policy makes reference to security lighting, however advertisement illumination is covered in proposed policy D7.
Effingham Parish Council		
	Should add that the appearance of the shop front should be in character with its surroundings. There are too many shops in the borough that are out of character with their neighbours and out of character with the area including: unsightly security grills and other security equipment, unsightly and garish colours, too many advertisements and over illumination at night.	Agreed – The policy has been amended to provide additional emphasis on local distinctiveness and contextual design. This is achieved by: <ul style="list-style-type: none"> • Citing that shopfronts are required to be designed to a high quality that is responsive to or enhances the character and appearance of their surrounding context. • Having an expectation that their design retains or relates well to the proportion, scale, detailing, period and character of the host building as a whole and the wider street setting. • Expecting that shopfronts that contribute positively to the established character and appearance of the building they form part of, or the surrounding context to be retained. • Expecting the retention of original features and details where they are of architectural or historic interest, or where they contribute to the character and appearance of the street scene.

Residents for Guildford and Villages / Guildford Green Belt Group		
	This policy, together with policy D7 Advertisement, hanging signs and illumination should be moved to the later part of the Design Chapter to enable the design policies to be read in sequence.	Agreed - However we cannot do this until we adopt the plan as we need to make sure that all comments across all consultations are coded against the same policy number to ensure that the inspector can understand the issues raised throughout plan preparation.
Other respondents		
	Plate glass shopfronts with the loss of mullions are appearing in the High St and an overload would damage the character of the street.	The policy sets out that the design of shopfronts are to be designed to a high quality, responsive to character and context and utilises sustainable materials and thus is deemed sufficient to cover the issue/scenario raised Specific mention for the retention of mullions where they are of architectural or historic interest is now included within the policy.
	Reference could be made to the 'Shopfront Design' SPD to give it greater weight.	It is agreed that there is merit in providing additional guidance on this topic, however this will be contained in a future SPD which is outside the scope of the LPDMP process. Not making reference to the SPD in the LPDMP does not preclude an SPD being produced, nor lessen the weight that can be applied to it.
	Should include heritage as a consideration	Agreed – The policy now includes a reference to the continued preservation or enhancement of the Borough's heritage assets. It also specifically identifies a requirement for the retention or restoration of shopfront which are identified as being of architectural or historic interest, as well as original feature and details.

	<p>2003 Policy G7 has a clause on respect for local character, this is missing from the new Policy.</p>	<p>Agreed – The policy has been amended to provide additional emphasis on local distinctiveness and contextual design. This is achieved by:</p> <ul style="list-style-type: none"> • Citing that shopfronts are required to be designed to a high quality that is responsive to or enhances the character and appearance of their surrounding context. • Having an expectation that their design retains or relates well to the proportion, scale, detailing, period and character of the host building as a whole and the wider street setting. • Expecting that shopfronts that contribute positively to the established character and appearance of the building they form part of, or the surrounding context to be retained. • Expecting the retention of original features and details where they are of architectural or historic interest, or where they contribute to the character and appearance of the street scene.
	<p>There should be a reference to the GBC Guidance on Shopfront Design and Security in Historic areas.</p>	<p>Agreed – The policy now includes a reference to the continued preservation or enhancement of the Borough’s heritage assets. It also specifically identifies a requirement for the retention or restoration of shopfront which are identified as being of architectural or historic interest, as well as original feature and details.</p>

Policy D7: Advertisement, Hanging Signs and Illumination		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		
	<p>Would benefit from supporting design advice in the form of supplementary planning guidance as they can have significant impacts, individually and cumulatively, on local character and distinctiveness of sensitive areas, such as Guildford high street and village centres.</p>	<p>The authority already has supporting guidance on this topic - GBC Design Guidance for Advertisement and Signs. https://www.guildford.gov.uk/media/4481/SPG-Adverts-and-Signs/pdf/Adverts_and_signs_SPG_230404.pdf?m=636063567589930000</p> <p>The existing guidance will cease to have legal effect when the LPDMP is adopted and the policy off which the guidance hangs is superseded. The Council considers that additional guidance is needed however this will occur outside of the LPDMP process. Not making reference to the SPD in the LPDMP does not preclude an SPD being produced nor lessen the weight that can be applied to it.</p>
Other organisations		
Theatres Trust		
	<p>Signage can be considered an integral and necessary element of the character of theatres and other performance venues (of which there are a number in Guildford) so this could be represented within the policy wording to afford sufficient flexibility.</p>	<p>The design of the policy is purposefully broad in order to capture all forms and formats of advertisement/signage. It is considered that singling out certain uses is unnecessary and would result in a very lengthy policy. This kind of detail could be picked up by way of a revision to the SPD.</p>
Cranley Road Residents' Association		

	<p>It is helpful to provide size limits for projecting signs for locations where these are potentially appropriate. This provides a level playing field.</p>	<p>Stipulating size limits for projecting signs or locations where they would be appropriate would be unreasonable, as the building stock within the borough in terms of its appearance, form and character, is hugely variable. It is more appropriate to judge each application on its own merits. There is also the potential that it would be overstepping the regulations.</p>
	<p>This policy should also refer to use of vinyl images across windows as at Friary, Aldi and proposed Coop. This will be a growing trend as buildings designed as shops with open glazed frontages diversify.</p>	<p>There are merits with this suggestion, and there is agreement that it is important to have active and open glazed frontages. However, on this particular matter there is a reasonable degree of crossover between shopfront design and advertisement. The conclusion that has been reached is that this matter is better covered in Shopfront Design, thereby, has been added into proposed policy D6: Shopfront Design, which stipulates that shopfronts should present an active frontage to the street scene at all times.</p> <p>A couple of the reason why it was deemed not appropriate to include reference to vinyl window stickers in this policy are:</p> <ul style="list-style-type: none"> • Not all can be defined as advertisement – e.g. blocked coloured vinyl's. • If they are internally applied then they do not require advertisement consent. <p>Nevertheless, detailed reference to this form of advertisement could be picked up by way of a revision to the SPD.</p>
<p>Guildford Society</p>		
	<p>The new Policy should make affirmative reference to the GBC Design Guidance for Advertisement and Signs.</p>	<p>The existing guidance will cease to have legal effect when the LPDMP is adopted and the policy off which the guidance hangs is superseded. The Council considers that additional guidance is needed however this will occur outside of the LPDMP process. Not making reference to the SPD in the LPDMP does not preclude an SPD being produced nor lessen the weight that can be applied to it.</p>

	<p>The technology of signs has changed considerably in recent years as regards use of large LED screens which can readily show unwelcome moving images and as regards the use of very large vinyls. The Guidance needs some updating.</p> <p>Would like to see a presumption against LED screen type advertisements particularly in heritage areas, and a presumption against freestanding advertisements on paved areas whether as part of telephones, bus shelters or similar</p>	<p>Under the current regulations applications for advertisement consent can only consider impact on amenity (including impact of heritage assets and public safety, which forms the core principles to the policy, and against which such applications/cases would be assessed. It would be unreasonable of the policy to prevent the use of LED screens in principle, as there may be some situations where they could be acceptable. Therefore, such a suggestion runs the risk of overstepping the regulations.</p> <p>In response to the comment made about the use of window vinyl, there are merits with this suggestion, and there is agreement that it is important to have active and open glazed frontages. However, on this particular matter there is a reasonable degree of crossover between shopfront design and advertisement. The conclusion that has been reached is that this matter is better covered in Shopfront Design, thereby has been added into proposed policy D6: Shopfront Design, which stipulates that shopfronts should present an active frontage to the street scene at all times.</p> <p>A couple of the reason why it was deemed not appropriate to include reference to vinyl window stickers in this policy are:</p> <ul style="list-style-type: none"> • Not all can be defined as advertisement – e.g. blocked coloured vinyl's. • If they are internally applied then they do not require advertisement consent. <p>Nevertheless, detailed reference to this form of advertisement could be picked up by way of a revision to the SPD.</p>
Holy Trinity Amenity Group		
	<p>The policy should include conformance to the associated detail SPG/SPD</p>	<p>The existing guidance will cease to have legal effect when the LPDMP is adopted and the policy off which the guidance hangs is superseded. The Council considers that additional guidance is needed however this will occur outside of the LPDMP process. Not making reference to the SPD in the LPDMP does not preclude an SPD being produced nor lessen the weight that can be applied to it.</p>

	<p>A-boards to be banned, at least in the Town Centre CA, and "TO LET" projecting boards. (Other LAs have done this).</p>	<p>The rules around outdoor advertisement and signage are complex, however it can be broken down into three broad categories</p> <ol style="list-style-type: none"> 1. Advertisement excluded from the planning authority's direct control 2. Advertisement for which the rules gives 'deemed consent' so that the planning authority's consent is not needed provided it satisfies certain rules/criteria 3. Advertisement for which the planning authority's 'expressed consent' is always needed <p>In response to the banning of A-boards.</p> <p>When business premises have a forecourt Schedule 3, Part 1, Class 6 of the Town and Country Planning (Control of Advertisement) Regulations 2007 gives a further deemed consent to display the type of advertisement permitted by Class 5, namely notices, signs and advertisement to draw attention to any commercial services, goods of sale or other services available at the premises. This could include measures such as A-boards However, it is subject to the following</p> <ul style="list-style-type: none"> • Notice, sign advertisement must be at ground level • Total area for all forecourt advertising must not exceed 4.6 square metres on each forecourt frontage to the premises • It must not be illuminated <p>It is worth noting that a forecourt does not include the area of pavement in front of a business premises which forms part of the highway. If a premise wished to place an A-board within the highway, a pavement licence would need to be obtained from the Local Authority.</p> <p>Given all the above we conclude that a ban on A-boards would be futile and would be overstepping the regulations.</p> <p>Turning attention to the banning of 'TO LET' projection boards our conclusions would be the same as above, it would be a futile exercise and against the regulations.</p>
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		<p>Schedule 3, Part 1, Class 3 of the Town and Country Planning (Control of Advertisement) Regulations 2007 gives deemed consent for a wider variety of notices and signs which are usually displayed to publicise a forthcoming event or to advertised a short-term use of the advertisement site. As such Class 3 is divided into six separate categories, one of them being 3(A) which permits boards to be displayed by estate agencies, chartered surveyors, auctioneers and valuers, advertising that land or premises are for sale or to let. However, being deemed consent, it is subject to the following:</p> <ul style="list-style-type: none"> • The advertisement board for each sale or letting must not exceed, if the sale or letting is for agricultural, industrial or commercial use or development for such use, 2 square meters. • If two boards are joined together to form a single advertisement, a total surface area of 2.3 square metres is permitted. • If the sale or letting is for residential use or development, the advertisement board must not exceed 0.5 square metres, or a total area of 0.6 square metres for two joining boards • No advertisement board in allowed to extend outwards from the wall of a building by more than 1 metre. • In each case only one board may be displayed on premises and this must be removed no later than 14 days after completion of the sale or granting of the tenancy.
	<p>Banners across the High Street should also be banned except possibly for minimal limited periods to advertise public (not commercial) functions.</p>	<p>Under the current regulations applications for advertisement consent can only consider impact on amenity (including impact of heritage assets) and public safety, which forms the core principles to the policy, and which such applications/cases would be assessed against. It would be unreasonable of the policy to stipulate a ban on banners across the High Street, as there may be some situations where they would be/are acceptable. Therefore, such a suggestion runs the risk of overstepping the regulations, which is the primary consideration.</p>
	<p>Limit extent to which shop windows and building site hoardings can be used for advertisements.</p>	<p>The rules around outdoor advertisement and signage are complex, however it can be broken down into three broad categories</p>

		<ol style="list-style-type: none"> 1. Advertisement excluded from the planning authority's direct control 2. Advertisement for which the rules gives a 'deemed consent' so that the planning authority's consent is not needed provided it satisfies certain rules/criteria 3. Advertisement for which the planning authority's 'expressed consent' is always needed <p>With regards to shops/shopping arcades etc... Schedule 3, Part 1, Class 5 of the Town and Country Planning (Control of Advertisement) Regulations 2007 gives deemed consent for a wide variety of notices, signs and advertisements to draw attention to any commercial services, goods of sale, or any other services available at the premises where the advertisement is being displayed. The stipulations under the deemed consent (excluding Areas of Special Control of Advertisement) are that it must not</p> <ul style="list-style-type: none"> • Have any letters, figures, symbols or similar features in the design over 0.75m in height • Have its highest part at more than 4.6m above ground-level • Have its highest part above the level of the bottom of the 1st floor window in the wall where the advertisement is • Be illuminated, unless the illumination is intended to indicate that medical or similar services or supplies are available at the premises <p>There is an additional criterion, specifically for shops which states</p> <ul style="list-style-type: none"> • The advertisement may be displayed only on an external wall which has a shop window in it <p>Equally, Schedule 3, Part 1, Class 5 of the Town and Country Planning (Control of Advertisement) Regulations 2007 gives deemed consent for the advertisements displayed inside buildings where:</p> <ul style="list-style-type: none"> • They are illuminated (for example, a sign hanging internally within the shop window) • The building is mainly used to display advertisement; or
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		<ul style="list-style-type: none"> • The advertisement is within 1m of any window or other external opening through which it can be seen from outside the building. <p>Given all of the above we don't think it would be beneficial to limit the extent of advertisement to shops as it would only be relevant to anything exceeding the criteria, and in turn anything exceeding the criteria could be managed through the proposed policy.</p> <p>With regards to building/construction site hoardings, Schedule 3, Part 1, Class 8 of the Town and Country Planning (Control of Advertisement) Regulations 2007 permits the display, <u>for three years only</u>, of poster-hoardings which are being used to screen building/construction sites as deemed consent. In addition to the three-year time limit, the legislation stipulates that they must not:</p> <ul style="list-style-type: none"> • Be more than 38 square metres in area • Be more than 4.6 metres above ground level • Be displayed more than 3 months before building or construction work commences <p>Given the above we don't think it would be beneficial to limit the extent of advertisement to building/construction site hoardings as it would only be relevant to anything exceeding the criteria, and in turn anything exceeding the criteria could be managed through the general policy provision.</p>
Compton Parish Council		
	Does not support the introduction of any illuminated or neon shop-fronts or signs in the historic section of the High Street.	This matter is currently picked up in the GBC Design Guidance for Advertisement and Signs, however the existing guidance will cease to have legal effect when the LPDMP is adopted and the policy off which the guidance hangs is superseded. The Council considers that the additional guidance on this topic needs to be maintained, particularly in reference to the more sensitive areas, such as the heritage assets of the historic section of Guildford High Street, listed buildings and other conservation areas, as there is a risk of harm to their architectural and historical

		<p>significance from poorly design illumination and signage. However, this will occur outside of the LPDMP process. Not making reference to the SPD in the LPDMP does not preclude an SPD being produced nor lessen the weight that can be applied to it.</p> <p>Notwithstanding the above, the policy has been amended to make clear the following</p> <ul style="list-style-type: none"> • that illuminated advertisement must not have a detrimental impact on the amenity of adjoining properties and wildlife habitats • that proposals will only be supported where there is no detriment to amenity by reason of method & degree of illumination/luminance (amongst other things) • designs are responsive to, or enhance the appearance, character and vitality of an area by having regard to level & method of illumination (amongst other things) • proposals affect heritage assets and their setting will be expected to preserve or enhance and where appropriated better reveal their architectural and/or historical significance <p>Using this policy in tandem with Policy D17: Listed Buildings and Policy D18: Conservation Areas, there is confidence that these can be applied successfully to applications on the historic part of the High Street (as well as other heritage assets) in order to manage and ensure their preservation, conservation and/or enhancement.</p>
Policy para (2)	Could be widened to incorporate sight-line issues, rather than just access (as ad-hoc signs on street corners can affect sight lines for drivers).	Public safety is one of only two matters which advertisement consent can be considered as directed by the regulations and is to be integrally woven into the policy. As such matters and scenario such as this will be covered
Burpham Neighbourhood Forum		
Policy para (3)	Presumption against proposals for internally and/or externally illuminated fascias and hanging signs in	The policy has been amended to set out a general expectation that illuminated advertisement must not have a detrimental impact on the amenity of adjoining properties and wildlife habitats. By virtue of this

	Guildford High Street should be applicable to other 'main' shopping centres.	change the policy can be applied to all forms of illuminated advertisements that require advertisement consent.
British Sign and Graphics Association		
	Do not consider that Policy D7 is required. It places additional and unnecessary restrictions on businesses who are already struggling to compete with online shopping and keep High Streets alive. The Regulations require that control be exercised only in the interests of amenity and public safety. This is confirmed in the NPPF and guidance is given in the NPG. In our view, this is sufficient for all circumstances. The detail given in the proposed Policy D7 is unnecessary. Specification of scale, colour, materials etc is all covered by the term "amenity". If an advertisement fails to compliment the building on which it is set or its surroundings (because of any factor of its display), it fails the test of "amenity". The policy is therefore entirely unnecessary.	Disagree. Paragraph 132 of the NPPF states that the quality and character of places can suffer when advertisements are poorly sited and designed. As advertisement is a complex topic, the aim and purpose of this policy is to: <ul style="list-style-type: none"> • set a clear rational and consistent approach to the provision of advertisement • to set parameters to ensure that the quality and character of a place does not suffer
Policy para (1)	The Regulations do not permit the refusal of, or resistance to, any particular type of signage as a generality. Each proposed advertisement must be considered on individual merit. Thus, the last sentence of paragraph 5.31 in the supporting text and draft Policy D7(1) are entirely contrary to the Regulations and national guidance. Why should hanging signs on historic buildings be automatically unacceptable? A brief survey of High Street indicates that there are over 30 hanging signs already displayed along the cobbled section. Somebody must think them acceptable! And why should illumination be "resisted"? This is not a dark countryside area where the stars shine brightly without any intrusion from city lights. The street is well-	Agreed - Each application must be considered on individual merit and to stipulate in policy that hanging signage or their illumination would not be supported in the historic High Street, as the preferred option had suggested, would be unreasonable, as there may be some instances where it may be necessary. In response the policy no longer includes this. <p>However, to ensure that the policy can be used proactively to safeguard areas of sensitivity, such as the historic part of the High Street, Listed Buildings and Conservation Areas we have still stipulated the following</p> <ul style="list-style-type: none"> • that proposals will only be supported where there is no detriment to amenity by reason of design, size, colour, position, materials, amount, type & scale of text, cumulative clutter & method & degree of illumination/luminance • designs are responsive to, or enhance the appearance, character and vitality of an area by having regard to designs are responsive

	<p>lit and illumination, per se, cannot be said to be out of place.</p>	<p>to, or enhance the appearance, character and vitality of an area by having regard to level & method of illumination</p> <ul style="list-style-type: none"> • signage is integrally designed to respect the entire elevation and proportions of the building, taking account of any architectural features and detailing. • proposals that would result in harm, to or concealment of architectural features and detailing of historic or architectural significance will not be supported • proposals affect heritage assets and their setting will be expected to preserve or enhance and where appropriated better reveal their architectural and/or historical significance <p>Using these in tandem with Policy D17: Listed Buildings and Policy D18: Conservation Areas, there is confidence that these can be applied successfully to applications on the historic part of the High Street (as well as other heritage assets) in order to manage and ensure their preservation, conservation and/or enhancement.</p>
<p>Policy para (1), (2) and (3)</p>	<p>All the detail in draft Policy D7(1) and (2) is simply covered by the term “amenity”. As to “the presumption against illumination” proposed in Policy (3), this is ridiculous. All premises rely on trading after dark (and before dawn) during the dark winter months. And why should this anyway be a determining consideration? It does not appear to have any relationship to “amenity”. If an illuminated sign is acceptable in terms of amenity and public safety, it is acceptable whether or not the premises trade in the dark hours. If it is thought essential to darken the street during the quiet hours, the Council may impose conditions on consents for illuminated advertisements that the illumination be extinguished when the premises are closed for trade with the public.</p>	<p>Agreed - Each application must be considered on individual merit and to stipulate in policy that illumination would not be supported in the historic High Street, as the preferred option had suggested, would be unreasonable, as there may be some instances where it may be necessary. In response the policy no longer includes this.</p> <p>However, to ensure that the policy can be used proactively to safeguard areas of sensitivity, such as the historic part of the High Street, Listed Buildings and Conservation Areas we have still stipulated the following</p> <ul style="list-style-type: none"> • that proposals will only be supported where there is no detriment to amenity by reason of design, size, colour, position, materials, amount, type & scale of text, cumulative clutter & method & degree of illumination/luminance • designs are responsive to, or enhance the appearance, character and vitality of an area by having regard to designs are responsive

		<p>to, or enhance the appearance, character and vitality of an area by having regard to level & method of illumination</p> <ul style="list-style-type: none"> • signage is integrally designed to respect the entire elevation and proportions of the building, taking account of any architectural features and detailing. • proposals that would result in harm, to or concealment of architectural features and detailing of historic or architectural significance will not be supported • proposals affect heritage assets and their setting will be expected to preserve or enhance and where appropriated better reveal their architectural and/or historical significance <p>Using these in tandem with Policy D17: Listed Buildings and Policy D18: Conservation Areas, there is confidence that these can be applied successfully to applications on the historic part of the High Street (as well as other heritage assets) in order to manage and ensure their preservation, conservation and/or enhancement.</p>
Policy para (5)	<p>Proposed Policy (5) is unlawful. It relates to the content of the sign. The Regulations specifically state that content or subject matter is not a relevant consideration unless it affects amenity or public safety. Whether the sign relates directly to the premises is again not a consideration of “amenity”.</p>	<p>Agreed - Under the current regulations applications for advertisement consent can only consider impact on amenity, including impact of heritage assets and public safety. Development plan policies are secondary to this and can only support the assessment under those two requirements. Therefore, requiring an advert to be either appropriate and or relevant to the premises would be over and above those requirements. Therefore, the policy no longer includes this.</p>
Residents for Guildford and Villages / Guildford Green Belt Group		
	<p>This policy, together with policy D6 Shopfront Design should be moved to the later part of the Design Chapter to enable the design policies to be read in sequence.</p>	<p>Agreed - However we cannot do this until we adopt the plan as we need to make sure that all comments across all consultations are coded against the same policy number to ensure that the inspector can understand the issues raised throughout plan preparation.</p>

Other respondents		
	Extend this to make it clear that advertising and light pollution is not supported beyond the built-up area either. The topic could include the damaging effects of illumination on biodiversity. Illumination also consumes energy so reducing it supports climate change mitigation.	To stipulate in policy that illuminated advertising would not be supported beyond the built-up area would not be reasonable as there may be instances where it is necessary. However, amendments have been made to say that illuminated advertisement must not have a detrimental impact on the amenity of adjoining properties and wildlife habitats.
	Another aspect is the issue of roadside illuminated signs (including those erected by local authorities) that may affect the concentration of a driver – particularly close to a hazard such as a pedestrian crossing.	Public safety is one of only two matters which advertisement consent can be considered as directed by the regulations and is to be integrally woven into the policy. Nevertheless, it must be noted that there are a certain number of advertisement forms which are excluded from direct control, traffic signage (as defined in section 64(1) of the Road Traffic Regulation Act 1984) being one.
	The new Policy should make affirmative reference to the GBC Design Guidance for Advertisement and Signs.	The existing guidance will cease to have legal effect when the LPDMP is adopted and the policy off which the guidance hangs is superseded. The Council considers that additional guidance is needed however this will occur outside of the LPDMP process. Not making reference to the SPD in the LPDMP does not preclude an SPD being produced nor lessen the weight that can be applied to it.
	The technology of signs has changed considerably in recent years as regards use of large LED screens which can readily show unwelcome moving images and as regards the use of very large vinyl's.	Under the current regulations applications for advertisement consent can only consider impact on amenity (including impact of heritage assets and public safety, which forms the core principles to the policy, and against which such applications/cases would be assessed. It would be unreasonable of the policy to prevent the use of LED screens in principle, as there may be some situations where they could be acceptable. Therefore, such a suggestion runs the risk of overstepping the regulations.
Policy para (7)	Does point 7 cover stopping shops putting out obstructive A boards on the pavements?	The rules around outdoor advertisement and signage are complex, however it can be broken down into three broad categories 4. Advertisement excluded from the planning authority's direct control

		<p>5. Advertisement for which the rules gives a 'deemed consent' so that the planning authority's consent is not needed provided it satisfies certain rules/criteria</p> <p>6. Advertisement for which the planning authority's 'expressed consent' is always needed</p> <p>In response to the banning of A-boards.</p> <p>When business premises have a forecourt Schedule 3, Part 1, Class 6 of the Town and Country Planning (Control of Advertisement) Regulations 2007 gives a further deemed consent to display the type of advertisement permitted by Class 5, namely notices, signs and advertisement to draw attention to any commercial services, goods of sale or other services available at the premises. This could include measures such as A-boards However, it is subject to the following</p> <ul style="list-style-type: none">• Notice, sign advertisement must be at ground level• Total area for all forecourt advertising must not exceed 4.6 square metres on each forecourt frontage to the premises• It must not be illuminated <p>It is worth noting that a forecourt does not include the area of pavement in front of a business premises which forms part of the highway. If a premise wished to place an A-board within the highway, a pavement licence would need to be obtained from the Local Authority.</p> <p>Given all the above we conclude that a ban on A-boards would be futile and would be overstepping the regulations.</p>
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Policy D8: Public Realm		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		
	Agree; the public realm in all its components strongly underpins special character and distinctiveness of locations such as Guildford high street, and the historic character of such places should be reinforced.	Noted.
Other organisations		
Cranley Road Area Residents' Association		
	This policy should place more emphasis on opportunity for green features and sustainable drainage.	The policy has been amended to include a requirement for trees and other planting to be incorporated. Emerging Policy P13 addresses sustainable drainage systems.
	The reference to outdoor dining opportunities is too casual. This needs much greater attention. A policy is required which promotes opportunities without creating established use rights or undermining public access rights, which provides for coordination in layout to ensure streets remain passable for all users, and which prevents A boards, banners and other clutter.	These matters are addressed through the pavement licencing regime.
Compton Parish Council		
Policy para (9)	Should also include reference to public opinion via the use of on-line polling.	Public consultation will be undertaken as part of the planning application process for any proposals for public realm improvements or development proposals that include an element of public realm.
Burpham Community Association		

	Should include consideration of the safety of residents and visitors.	LPSS Policy D1(8) addresses crime prevention and security measures. It is also addressed through other legislation. The emerging policy does refer to safe streets. The supporting text will reference requirements in Policy D1.
Merrow Resident's Association		
	Should include seeking the opportunity for the introduction of green planting.	The policy has been amended to include a requirement for trees and other planting to be incorporated.
Taylor Wimpey		
	The following should be added to the section on public art: "For strategic sites, public art strategies should be designed and approved in accordance with the Strategic Design Code submitted for each strategic site,"	This has been included in the supporting text.
Guildford Residents' Association		
	Would like to see an addition to the policy which is designed to seek opportunity for the introduction of green planting.	The policy has been amended to include a requirement for trees and other planting to be incorporated.
	(6) referring to charging points for electric vehicles? How do vehicles and parking fit into public realm projects?	Agreed. This aspect of the policy has been removed. The emerging policy does however refer to the provision of mobility hubs.
	(2) after 'user friendly for all' it may be appropriate to add 'including the disabled'.	This has been removed from the draft policy as it is already addressed by LPSS Policy D1(9). The supporting text will reference requirements in Policy D1.
Woodland Trust		
	Would like to see the policy expanded to reflect the importance of natural elements in the built environment. Trees, hedgerows and other green infrastructure in urban spaces enhance well-being,	The policy has been amended to include a requirement for trees and other planting to be incorporated.

	<p>provide shelter and shade, improving the look and feel of the public realm and creating a local identity.</p> <p>In support of this, we propose adding the following new section (or similar wording), and renumbering</p> <p>“(3) incorporate existing trees, green space and other important natural features to enhance the overall environmental quality for people and nature.”</p>	
Guildford Society		
	<p>There is a 1995 SPG on Street Cafes but it needs updating: the new Policy D8 should make reference to this.</p>	<p>The current SPG is no longer relevant given its age and the fact it hangs off a policy in the Local Plan 1995. A revised SPD is not anticipated in the current work programme. For this reason it is not considered appropriate to reference an SPD however this would not prevent the future preparation of an SPD if it is found to be necessary.</p>
	<p>The new Policy contains a section on Public art, which is welcome, but care is necessary to ensure it does not stifle creativity. The council’s Art Strategy needs the flexibility to allow for temporary works of art.</p>	<p>The Council’s Art Strategy covers all types of public art – it states that: <i>Public art commissions can be temporary or permanent, internal or external; they can be stand-alone features or integrated into the environment.</i></p>
	<p>A statement on the desirability of having greenery and planting in the public realm?</p>	<p>The policy has been amended to include a requirement for trees and other planting to be incorporated.</p>
	<p>We are puzzled to the reference to charging points – as this whole policy appears focussed on the provision of car free areas.</p>	<p>Agreed. This aspect of the policy has been removed to be included in a new policy (Policy D5a). The emerging policy does however refer to the provision of mobility hubs.</p>
Weyside Urban Village		
	<p>The general principles within Policy D8 could be expanded to provide further measures to help a space to be a local destination, for example the provision of fixed seating incorporated in the landscape design for users to enjoy the space, Tree planting to be included to provide shading and cooling for users and any planting</p>	<p>The policy has been amended to include a requirement for maximising opportunities for activity and enjoyment, and encouraging interaction and community cohesion. Tree planting for shading/cooling and biodiversity is addressed by emerging policies D13 and P6.</p>

	to be included in the design of public open space for visual aesthetic as well as encouraging biodiversity.	
Policy para (10)	Reference to public art at criterion 10 could also note that public art can relate to the history of the site and the surrounding area being developed to assist with maintaining and enhancing local distinctiveness and character.	The policy has been amended to state that public art should respond appropriately to its context and history.
Holy Trinity Amenity Group		
Policy para (8)	To extend pavement use to dining, rather than cafes, would be a major and problematic change. We support traditional pavement cafes, and the existing rules (SPG) are reasonable and work well. However, we do not favour this being extended to “dining”. As well as the ban on street alcohol consumption there is also now a ban on use of space heaters that restricts use to warm days. Use of on-site space, that may bound onto the highway (public realm), is permissible, and proprietors already maximise the use of their outdoor space to extend their active area. Control is also exercised through the licensing system, but this does not always address the problem of nuisance to neighbours.	The policy no longer includes reference to outdoor dining. The aspects listed are addressed through the licensing regime and other generic policies will apply in relation to avoiding potential impacts on amenity and achieving high quality design.
	Should reference existing and revised SPG/SPDs on the subject.	The current SPG is no longer relevant given its age and the fact it hangs off a policy in the Local Plan 1995. A revised SPD is not anticipated in the current work programme. For this reason it is not considered appropriate to reference an SPD however this would not prevent the future preparation of an SPD if it is found to be necessary.
Guildford Vision Group		
	Ignores the potential of the riverside through the town as a vibrant area of public realm. While many elements come within the purview of the National Trust, and addressed in part as a separate Topic, it is vital that the riverside through the town centre is	LPSS Policy S3 seeks to deliver an attractive and safe public realm and improved access and views to the river Wey. Emerging Policy D11 seeks to enhance the public realm value of the river and encourage greater access to it.

	comprehensively and sensitively exploited as attractive public realm. It should not be used for surface car parking.	
Residents for Guildford and Villages / Guildford Green Belt Group		
	The wording of policy and supporting text relates to 'public realm projects' rather than public realm as part of wider development projects. Policy G5 (3) of the 2003 dealt with Space Around Buildings and it was clear that this related to all new developments and the requirement new spaces to be attractive and have an identifiable character. It is fundamental that GBC make it clear that high quality public realm is a requirement of all development proposals rather than just in relation to specific proposals for new public realm in isolation.	The policy has been written to make it clear that it applies to all public realm delivered as part of development and not just stand alone public realm projects.
Other respondents		
	Greenery and trees should be added to the policy as they give life and character to public spaces, and add considerably to the attractiveness of a town. Such greenery needs to be planned in advance when public space is created or refurbished.	The policy has been amended to include a requirement for trees and other planting to be incorporated.
	Artwork should not clutter narrow streets and overload prestigious areas such as the High St, but be used to enhance areas which need enhancing, nor be installed in the Surrey Hill AONB detracting from its natural beauty, which is spoilt by manmade structures.	All proposals must have been considered and assessed against the Council's Art Strategy – this includes a number of stages that need to have been gone through prior to installation to ensure that they are appropriate to their location.
Policy para (5)	There must be no adverse impact on biodiversity by introducing new uses into community spaces.	This is addressed by the emerging biodiversity policies.
	There is a 1995 SPG on Street Cafes but it needs updating: the new Policy should make reference to this.	The current SPG is no longer relevant given its age and the fact it hangs off a policy in the Local Plan 1995. A revised SPD is not anticipated in the current work programme. For this reason it is not considered appropriate to reference an SPD

		however this would not prevent the future preparation of an SPD if it is found to be necessary.
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Policy D9: Residential Intensification		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Highways England		
	We are supportive of the sustainable principles underpinning the preferred approach to residential intensification with a need to prioritise delivery of walking and cycling infrastructure. Without sufficient transport infrastructure capacity, large scale intensification of use can pose a risk to the SRN in terms of safety and capacity. Therefore we request that a reference is provided to undertaking Transport Assessments where the scale of the intensification would make this an appropriate action to ensure that this risk is mitigated.	As this is a design policy, it is not considered necessary to repeat other policy requirements included in the Development Plan – the Plan is read as a whole. This particular matter is addressed by the adopted LPSS Policy ID3: Sustainable transport for new developments which requires Transport Statements or Assessments for new developments generating a significant amount of movement (this is also set out in the LPA's Local Validation List).
Historic England		
	Agree; intensification of development, where appropriate, should be closely defined by prevailing character in historically distinctive locations.	Noted. Proposed policy D9 address character. Character is also addressed by Policy D4: Achieving high quality design and local distinctiveness and further policy guidance is given within LPSS policy D3: Historic environment.
Other organisations		
Guildford Residents' Association		
Policy para 1(d)	'are appropriate' is redundant.	Agreed. This text is not included in the proposed policy.
Policy para 1(e)	it may be worth adding 'including cycles' after 'parking', and add 'external amenity' as a consideration.	Whilst both these aspects are dealt with by other policies, given their particular relevance within infill development further text has been added including reference to amenity space and cycle parking.

Policy para (2)	like to see mention of local landscape, and also of ensuring respect for views, particularly in and out of an AONB.	LPSS Policy D1 (17) Place shaping references having regard to important views of the village from the surrounding landscape and views within the village of local landmarks. Also Policy D4: Achieving high quality design and local distinctiveness references landscape and views. Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value has policy criteria that development proposals must have regard to protecting its setting and development within the AGLV must demonstrate it would not harm setting of AONB or the distinctive character of the AGLV'. Although reference to Policies D1 and D4 is included in the supporting text, the existing policy coverage makes it unnecessary to repeat these safeguards in this policy.
Woodland Trust		
	Whatever the density of housing, it is important to integrate green infrastructure and maximise the potential tree canopy cover. In high density housing, space along boundaries, paths and in areas of public space can still be used to accommodate hedgerows, tree roots and canopy growth, and this should be part of the required design standards. Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. We recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019).	Comments noted. This issue is addressed in proposed Policy P6/P7: Biodiversity in new development which includes expectations regarding planting schemes and landscaping. Landscaping is addressed in LPSS Policy D1: Place shaping (7) where it states 'all new development...include high quality landscaping that reflects the local distinctive character.' Proposed policy D4: Achieving high quality design and local distinctiveness also references landscape, as does this Policy D9, in requiring to incorporation of landscaping measures. It is not considered necessary to repeat detailed aspects reflected in Policy P6/P7 within this policy as the plan must be read as a whole.
Holy Trinity Amenity Group		
	"Respect urban grain" is too vague. This might be relevant to extensions to the urban area but for established areas could be interpreted as banning all development that would make the "grain" denser. This needs to be related to dwelling density and requires clarification / quantification.	Policy D9 requires proposals for frontage development to have regard to the existing urban grain alongside other considerations. Urban grain is also addressed in Policy D4: Achieving high quality design and local distinctiveness where it refers to layout – settlement pattern of roads, paths, spaces

		<p>and buildings, urban grain, plot sizes, building patterns, rhythms and lines. It is one of many factors to be taken into account and the decision maker would balance this with other considerations such as density. As each planning application varies and must be taken on its own merits, quantification is not considered appropriate in this instance.</p>
<p>Merrow Residents' Association</p>		
	<p>High-density accommodation brings its own problems to the residents in terms of access to open space and quality of life and it is for that reason that such developments must be carefully designed and placed so that they are 'pleasant and safe' places to live. The Covid19 pandemic has also highlighted the challenges associated with high density accommodation.</p>	<p>Comments noted. Density is one of many issues that must be considered when weighing up the benefits of new development. This policy, alongside other policies in the Local Plan, should ensure new places are well designed, safe and pleasant places to live.</p> <p>Proposed Policy D5: Protection of Amenity and Provision of Amenity Space is important in ensuring development avoids having an unacceptable impact on the living environment of existing residential properties as well as ensuring that new development creates a quality living environment for future residents.</p> <p>Furthermore, Policy D1: Place shaping and Policy D4: Achieving high quality design and local distinctiveness are particularly pertinent policies. Density is specifically addressed within Policy D4 which requires new development to reflect appropriate residential densities resulting from a design led approach taking into account factors such the character of the area.</p>
	<p>The policy should also specify that buildings must be in keeping with their setting and do not harm views to and from an AONB.</p>	<p>Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscaping Value addresses the AONB and states development proposals must have regard to protecting their setting. Policy D1 (17) Place shaping references having regard to important views of the village from the surrounding landscape. Also Policy D4: Achieving high</p>

		quality design and local distinctiveness references landscape and views so it is considered unnecessary to repeat in this policy.
Residents for Guildford and Villages / Guildford Green Belt Group		
	The wording as set out in the supporting text of paragraph 5.41 is welcomed as it shows a key link between density, design and character. This sentiment needs to be much more apparent throughout the whole DMP rather than the isolated reference to it within this policy.	This issue is addressed in more detail in Policy D4: Achieving high quality design and local distinctiveness at para 5. Further reference to design of residential infill development in villages is included in this policy and in the supporting text.
	NPPF refers to policies to resist inappropriate development of gardens - no indication on whether a policy to resist development of gardens has been considered and any future DMP would be unsound without a policy to restrict this in order to maintain the character of parts of the borough which could be subject to windfall applications of this type.	<p>NPPF para 70 states that plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area. Policy D9 addresses infilling and backland development which would include residential development within a garden. Policy D9 gives parameters when assessing applications for backland/garden development; it will help ensure there is no harm to the local area.</p> <p>It is considered that alongside Policy D9, existing and proposed Local Plan policies already address the issue of impact of a development on the local area as well as amenity, which would encompass inappropriate development within a garden.</p> <p>Proposed Policy D5: Protection of Amenity and Provision of Amenity Space is important in ensuring development avoids having an unacceptable impact on the living environment of existing residential properties.</p> <p>Policy D1: Place shaping (4) states all new development will be designed to reflect the distinct local character of the area</p>

		<p>and reinforce locally distinct patterns of development, including landscape setting.</p> <p>Proposed policy D4: Achieving high quality design and local distinctiveness states high quality design must be demonstrated including in relation to layout – settlement pattern of roads, paths, spaces and buildings, urban grain, plot sizes, building patterns, rhythms and lines.</p>
	<p>Part 2 of the policy is supported as it sets out consideration of development in village areas which are inset from the green belt. However, this aspect of the DMP would be more appropriate within a standalone policy alongside appropriate supporting text in order to deal with specific applications concerning development in these locations.</p>	<p>As the whole policy addresses residential infill development it is important to consider infill development in the villages at the same time. All the criteria in the policy would also apply to new development in villages, and the policy therefore needs to be read comprehensively as a whole.</p>
	<p>Further reference to, and weighting of Neighbourhood Plans is required within this policy to allow for such conflicts to be resolved in favour of protecting the character of villages and existing communities.</p>	<p>Neighbourhood Plans are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts, so additional referencing and weighting to NP within the LP is considered unnecessary. Additional reference to neighbourhood plans to be added to this policies reasoned justification.</p>
Compton Parish Council		
Policy para 1(c)	<p>Too vague. How “long” and “narrow” must the access points be?</p>	<p>Each application will be determined on its own merits, and each site’s characteristics will vary. Surrey County Council will have applicable highway standards. Suitable access (including dimensions) would need to accommodate safe pedestrian and cycle access and suitable access for emergency and refuse vehicles.</p>
Policy para 1(f)	<p>Too vague and subjective. What are “appropriate infrastructure contributions”? There needs to be some guidance, for example a schedule of infrastructure contributions could be drawn up</p>	<p>The supporting text provides further clarity regarding the intent of the policy. The nature and extent of the contributions would be dependent on the development proposed and associated</p>

	according to how many houses/facilities are built on a particular site.	infrastructure required to support the development. The policy seeks to avoid artificial subdivision and ensure that there are appropriate contributions commensurate with what would have been required on the larger site.
West Horsley Parish Council		
	Reference to Neighbourhood Plans for particular local requirements is required.	Neighbourhood Plans are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts, so additional referencing and weighting to NP within the LP is considered unnecessary. Additional reference to neighbourhood plans to be added to this policies reasoned justification.
Cllr Brothwell		
	Principal intensification should occur within our Town Centre at appropriate places and not be considered within existing villages which enjoy characteristics precious to residents and sought after by current and future potential residents.	All settlements need to retain their special character to the benefit of all residents. Various sites that reflect residential infill development are already allocated within villages by the Local Plan. Furthermore, infill proposals will likely come forward on other sites, including the potential for limited infilling in villages washed over by the Green Belt (which may be determined to be not inappropriate in terms of Green Belt policy). It would thus not be justified to entirely restrict (or not consider) infill development within existing villages. It is the role of this policy to provide criteria against which to judge residential infill proposals in order to avoid inappropriate forms of development in villages, but also urban areas.
Policy para 1(d)	This should be supported by any examples of size and metrage.	Each application will be determined on its own merits and each site's characteristics will vary.
	Acceptability of distances and infrastructure should be made a condition of any intensification policy.	Each application will be determined on its own merits. Policy D9 requires backland development to be acceptable, taking into account back to back or back to front distances.

		Infrastructure contributions and delivery is addressed in Policy ID1: Infrastructure and delivery and the Guildford borough Infrastructure Delivery Plan.
	Policy should indicate the number of parking spaces required for each dwelling with allowances for visitor parking. All parking should be on site and not surrounding streets.	Parking is addressed in proposed policy ID11 in the LPDMP.
Burpham Neighbourhood Forum		
Policy para 1(c)	This subsection needs to identify 'garden grabbing' and percentage of land take from gardens to prevent out of character development. We strongly recommend the use of Burpham Neighbourhood plan policy B-EN1 Residential Gardens which has stood the test of the planning appeals process.	<p>Policy D9 addresses infilling and backland development which would include residential development within a garden. Policy D9 gives parameters when assessing applications for backland/garden development; it will help ensure there is no harm to the local area.</p> <p>It is considered that alongside Policy D9, existing and proposed Local Plan policies already address the issue of impact of a development on the local area as well as amenity, which would encompass inappropriate development within a garden.</p> <p>Proposed Policy D5: Protection of Amenity and Provision of Amenity Space is important in ensuring development avoids having an unacceptable impact on the living environment of existing residential properties.</p> <p>Policy D1: Place shaping (4) states all new development will be designed to reflect the distinct local character of the area and reinforce locally distinct patterns of development, including landscape setting.</p> <p>Proposed policy D4: Achieving high quality design and local distinctiveness states high quality design must be demonstrated including in relation to layout – settlement</p>

		pattern of roads, paths, spaces and buildings, urban grain, plot sizes, building patterns, rhythms and lines.
Policy para 1(f)	We're concerned how this could be practicably enforced and support the council taking proper legal advice on this matter before submission of the land. Perhaps land ownership at a given date may provide a lock in date for this policy.	Comments noted. A date has not been specified, however the proposed policy has sought to clarify the circumstances when the policy might be engaged. It is accepted that cases of artificial subdivision may not always be clear cut and will need to be addressed on a case by case basis.
Downsedge Residents' Association		
	In accordance with NPPF, a policy concerning inappropriate development of residential gardens should be contained in the plan	<p>NPPF para 70 states that plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area. Policy D9 addresses infilling and backland development which would include residential development within a garden. Policy D9 gives parameters when assessing applications for backland/garden development; it will help ensure there is no harm to the local area.</p> <p>It is considered that alongside Policy D9, existing and proposed Local Plan policies already address the issue of impact of a development on the local area as well as amenity, which would encompass inappropriate development within a garden.</p> <p>Proposed Policy D5: Protection of Amenity and Provision of Amenity Space is important in ensuring development avoids having an unacceptable impact on the living environment of existing residential properties.</p> <p>Policy D1: Place shaping (4) states all new development will be designed to reflect the distinct local character of the area</p>

		<p>and reinforce locally distinct patterns of development, including landscape setting.</p> <p>Proposed policy D4: Achieving high quality design and local distinctiveness states high quality design must be demonstrated including in relation to layout – settlement pattern of roads, paths, spaces and buildings, urban grain, plot sizes, building patterns, rhythms and lines.</p>
	<p>Where residential intensification occurs landscaping takes on greater importance in setting new development into the existing street scene. A policy should be included to require a high quality of landscaping design in new development as provided by policy G5(9) in the 2003 Local Plan.</p>	<p>Proposed policy D9 includes a requirement for incorporation of landscaping measures.</p> <p>This issue is addressed in proposed Policy P6/P7: Biodiversity in new development which includes expectations regarding planting schemes and landscaping.</p> <p>Landscaping is addressed in LPSS Policy D1: Place shaping (7) where it states ‘all new development...include high quality landscaping that reflects the local distinctive character.’</p> <p>Proposed policy D4: Achieving high quality design and local distinctiveness also references landscape.</p>
Ockham Parish Council		
	<p>The principles behind residential intensification are far more appropriate within an urban setting than they are within villages. Allocated sites and windfall development within villages frequently compromises the identity of the area, creating higher density housing and destroying character.</p>	<p>This policy, combined with other policies in the Local Plan will ensure that new development is appropriate to its location and setting. Policy D1: Place shaping and Policy D4: Achieving high quality design and local distinctiveness are particularly pertinent.</p>
West Clandon Parish Council		
	<p>Need clarification that this policy is not applicable in villages still washed over by the Green Belt where limiting infilling can occur</p>	<p>The policy refers to different forms of infilling. Limited infilling in villages is listed as one of the exceptions in Green Belt policy and means that this sort of development is considered ‘appropriate’. If a scheme is judged to be appropriate in the Green Belt, then this policy would still be applicable as it</p>

		ensures that the design of the scheme is acceptable. The policy is therefore applicable in all locations although the policy goes on to specify certain requirements applicable to villages only. Further clarification is included in the supporting text for clarity regarding distinguishing this policy from Green Belt policy and the different tests that apply.
Other respondents		
	Local landscape/views into and out of the AONB can be impacted upon when houses are built or extended in residential areas: Upward extensions/roof line, dormer windows/lighting, front and back extensions	Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscaping Value addresses the AONB and states development proposals must have regard to protecting its setting. Policy D1 (17) Place shaping references having regard to important views of the village from the surrounding landscape. Policy D4: Achieving high quality design and local distinctiveness references landscape and views so it is considered unnecessary to repeat in this policy. The plan must be read as a whole.
	Reference to the 'Residential Design Guide'	Policy D4 says that due regard must be had to all national and local design guidance.
Policy para 2(e)	This should be applicable to all developments not just in villages. It should also be a "require" rather than "encourage"	Regarding encouraging pedestrian and cycle links – it is considered that this is sufficiently addressed by this policy in combination with others (both adopted and proposed). LPSS Policy ID3 para 2a requires new development to maximise the provision of walking and cycling routes. LPSS Policy D1: Place shaping para 6 also reflects that particular regard shall given to maximise opportunities for pedestrian and cycle movement.

		This point has been re-emphasised within Policy D9 where it can be a particular issue in considering infill proposals, including in villages.
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Policy D10 – ‘Agent of Change’ and Noise Impacts		
Paragraph	Main Issue Summary	GBC Response
Other organisations		
Sport England		
	The preferred option for the agent of change principle and noise impacts is too narrow. There are other factors such as lighting impacts which should also be considered for example development adjacent to pitches/facilities which benefit from sports lighting.	Specific policy aimed at the management of noise impacts is considered appropriate, given the level of detail required. To ensure that lighting impacts are covered, a dedicated ‘Dark Skies and Light Impacts’ policy has been drafted in addition to this policy. Policy D10a: Light Impacts and Dark Skies has been drafted to follow a similar approach to this policy, insofar as potential adverse impacts are required to be identified and avoided or mitigated as appropriate.
Send Parish Council		
	Reference could be included on the impact of noise on wildlife and the local environment.	Criteria (2) has been amended in order to require that applicants for noise generating uses must clearly identify any likely adverse noise effects arising from the proposed development on existing nearby ‘sensitive receptors’, including potential adverse effects on the natural environment. The definition of ‘sensitive receptor’ provided in the supporting text also clarifies that this includes wildlife and the natural environment: <i>Sensitive Receptors</i> - Features that are prone to adverse impacts from noise, such as living organisms, including humans and animals, ecological systems, sensitive habitats, and the natural environment.

Holy Trinity Amenity Group	
<p>There is an increasing problem of noise-spillage from pub outdoor-spaces, which are often adjacent to residential developments. Proprietors can do little to mitigate noise spillage, which means that controls must be exercised over use times and the use of music or amplification.</p> <p>Although we agree with the intent of this policy, there is concern that it could encourage venues, such as pubs, that are embedded in residential areas, to extend music and other noisy activities that could become a nuisance to neighbours.</p> <p><i>Proposed amendments:</i></p> <ul style="list-style-type: none"> • No increase in noisy activities or noise spillage will be allowed for established enterprises that adjoin or are close to established residential areas. • New “noise generating” activities must be separated from residential areas. 	<p>The National Planning Policy Framework sets out the ‘Agent of Change’ principle, which is intended to address these types of potential issue. Given the principle is set out in the NPPF, the Noise Impacts policy should have regard to this and cannot set out an opposing policy.</p> <p>Development proposals are required to identify potential noise impacts, either on or from the proposed development, and adequately prevent, avoid and/or mitigate those noise impacts as appropriate. Relevant development proposals would therefore need to consider the potential for these types of noise impact and manage them appropriately.</p> <p>The Noise Impacts policy cannot be applied retrospectively to existing development. However, relevant existing developments are managed through the licensing regime. The Noise Impacts policy could only affect the design of the proposal where a planning application is required to implement any of the intended changes.</p>
Guildford Borough Council Regulatory Services	
<p>Further clarification requested on how the Policy works with Permitted Development, for example Offices (B1a) to Residential (C3), where there are very few options on requesting mitigation measures.</p> <p>The noise exposure hierarchy being applied to developments is necessary. LOAE level should be applied in all noise assessments.</p>	<p>National Planning Practice Guidance (Paragraph: 016, Reference ID: 30-016-20190722) sets out that the principles of the guidance can be used to assist in fulfilling the ‘prior approval’ requirements with regard to noise management found in Regulations such as the Town and Country Planning (General Permitted Development) (England) Order 2015 (SI 2015/596) as amended.</p> <p>There are a number of situations in which the Local Planning Authority can assess noise impacts through ‘Prior Approval’ assessments. In those situations, potential noise impacts must be identified and adequately prevented, avoided or mitigated as appropriate. The applicant should engage with the Council in order to determine whether a full noise impact assessment will be required. Where the applicant cannot demonstrate that</p>

		any Observable Adverse Effects can be prevented, avoided or mitigates as set out in the policy, the application will be refused.
The Theatres Trust		
	<p>Agree with proposed policy. However, it should be amended to improve its robustness and effectiveness; presently there is too much flexibility given to applicants which could undermine the policy's objective.</p> <p><i>Proposed amendments:</i></p> <p>1) planning applications for the development of noise-sensitive uses (should) *must* consider their proximity to noise-generating uses. Applications for noise generating uses (should) *must* also consider their proximity to noise-sensitive uses.</p> <p>(Where appropriate) *Where development would potentially impact on existing uses,* applications (should) *must* include a Noise Impact Assessment, which considers this relationship and the impact of any potential noise impacts either on or from the proposed development. Applicants must clearly identify the likely effect levels from, or on, existing uses nearby to the proposed development as a result of the proposal, including the potential adverse effect that they may have on the new and existing residents or users.</p> <p>5) where there is likely to be an unacceptable impact on either proposed or existing noise-sensitive uses, which cannot be prevented or adequately mitigated, planning permission (is likely to) *will* be refused.</p>	<p>Policy criteria have been re-drafted in order to improve the robustness of the terminology.</p> <p>Criteria (1) and (2) now require that applicants for noise-sensitive and noise-generating uses are required to clearly identify any likely adverse noise effects on sensitive receptors, either to or from the proposed development respectively.</p> <p>Criteria (3) has been strengthened to require that where consideration under (1) or (2) indicates the potential for Observed Adverse Effect Levels of noise, applications are required to include a Noise Impact Assessment, which considers the relationship in detail. Criteria (5)(b) then requires that any identified adverse noise impacts must be prevented, avoided, and/or mitigated as appropriate.</p> <p>Criteria (7) has been strengthened to ensure that where there will be an unacceptable impact on either proposed or existing noise-sensitive uses, which cannot be prevented or adequately mitigated, planning permission will be refused.</p>
West Horsley Parish Council		
	Reference could be included on the impact of noise on wildlife and the local environment.	Criteria (2) has been amended to require that applicants for noise generating uses clearly identify any likely adverse noise effects arising from the proposed development on existing

		<p>nearby 'sensitive receptors', including potential adverse effects on the natural environment.</p> <p>The definition of 'sensitive receptor' provided in the supporting text also clarifies that this includes wildlife and the natural environment:</p> <p><i>Sensitive Receptors</i> - Features that are prone to adverse impacts from noise, such as living organisms, including humans and animals, ecological systems, sensitive habitats, and the natural environment.</p>
Guildford Vision Group		
	GVG suspects the policy will become a focus of challenge and has the potential to become a Nimby's Charter.	The 'Agent of Change' principle is set out within the NPPF. The intention of this policy is to set out how this principle should be managed in practice in order to ensure that appropriate development is brought forward that does not impact either businesses or occupants' health or quality of life.
Burpham Neighbourhood Forum		
Policy D10 (1)	Noise assessment requires over time readings, not single days in May, there is plenty of equipment available to monitor longer term noise assessment, so cost is not a concern.	It is unclear what this is referencing. There is no proposed viability assessment for the undertaking of Noise Impact Assessments. The policy sets the expectation that any Noise Impact Assessments is undertaken to the best industry standards.

Ockham Parish Council		
	We support the principles of Agent of Change and noise impact within urban settings. Noise polluting developments within rural settings are likely to be inappropriate for the setting and harmful on the natural environment.	The Noise Impacts policy is intended to apply to all areas of the borough, both urban and rural. There are many instances in which rural development could potentially give rise to Observed Adverse Noise Effects on sensitive receptors, including the natural environment. Planning applications would be assessed against this policy as appropriate.
Shalford Parish Council		
	We would like to see the problems of diesel train noise and pollution dealt with, to update the service available and reduce the pollution that goes with the current offering	This is outside the scope of the proposed Policy. However, proposed noise-sensitive uses, including new residential development, in a location within proximity to the diesel train line would be required to produce a Noise Impact Assessment if potential noise impacts were considered likely. Through this process, the proposed development could be determined as appropriate or otherwise. The policy cannot be applied retrospectively to existing development.
Other respondents		
Policy D10 9)	The policy should also ensure mitigation against noise impacts in the countryside where people walk and prevent adverse impacts on wildlife.	Criteria (2) has been amended to require that applicants for noise generating uses clearly identify any likely adverse noise effects arising from the proposed development on existing nearby 'sensitive receptors', including potential adverse effects on the natural environment. The definition of 'sensitive receptor' provided in the supporting text also clarifies that this includes wildlife and the natural environment: <i>Sensitive Receptors</i> - Features that are prone to adverse impacts from noise, such as living organisms, including humans and animals, ecological systems, sensitive habitats, and the natural environment.

	<p>Noise pollution is insidious and can reduce quality of life. From residential noise abuse to business noise-generating developments the facility for sufferers to have recourse to the implementation of restrictions retrospectively should be easier to generate.</p>	<p>The intention of this policy is to ensure that development proposals for noise-generating and noise-sensitive uses are designed and implemented appropriately, the policy cannot be applied to existing developments.</p>
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Policy D11: Corridor of the River Wey and Guildford and Godalming Navigation		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey Nature Partnership		
	Support	Noted
Environment Agency		
	<p>It must be noted that parts of the River Wey Navigation are also designated main river and form part of two Water Framework Directive (WFD) waterbodies. The objectives for the Wey Navigation sometimes conflict with the WFD objectives for those waterbodies, particularly in relation to public access, boating and heritage.</p> <p>We recommend that this policy is replaced by a separate 'watercourses and riparian corridors' policy and one specific to the Wey Navigation through Guildford Town Centre</p> <p>Watercourses and Riparian Corridor policy is advised to cover–</p> <ul style="list-style-type: none"> • the removal of barriers and impounding structures • the installation of fish passes (where it is not possible to remove barriers) • improvements to floodplain connectivity and restoration/creation of priority habitat • reversing the impacts of historic land drainage practices and restoring natural geomorphological processes • reducing impacts from diffuse and point source pollution <p>We recommend this policy includes a map to help distinguish between:</p> <ul style="list-style-type: none"> • the Wey Navigation only; 	<p>Agreed – The benefits of splitting the policy as suggested are acknowledged. To address this those key general themes relating to watercourses and riparian corridors have been incorporated in to emerging policy P12 Water Quality, Waterbodies and Riparian Corridors</p>

	<ul style="list-style-type: none"> the River Wey only; and the combined River/Navigation; <p>The policy should detail how potential conflicts between the two will be avoided/managed.</p>	
Historic England		
	Support	Noted
Other organisations		
Holy Trinity Amenity Group		
	Oppose any attempt to commercialise the riverside, or to make the banks into streets, which we already have plenty of. Ask that there be no further development on the flood plain, and that development beyond this be largely limited to new dwellings and limited provision of commercial services for the extra residents, with a set back from the river.	<p>LPSS Policy P4 addresses the strategic issue of flooding, and development in flood zones.</p> <p>The focus of this policy is to ensure that where development/redevelopment is appropriate, it is of a high-quality design that respects the distinct character of the Navigations and the policy has been amended so that this extends to flood mitigation.</p>
Sport England		
	Other Active Design Principles should also be incorporated into the policy to support the promotion of a well-designed area promoting active and healthier outcomes.	To address this, the policy now refers to the expectation to conservation and enhance the distinctive character in respect to, amongst other things, its recreational value. It also stipulates that where appropriate, support will be given to proposals which enable and support the promotion of active and healthier lifestyles.
Send Parish Council		
	Reference to Dark Skies required	The matter of dark skies and light impact is addressed in emerging policy D10a Light Impacts and Dark Skies. Given that the plan is to be read as a whole it has been concluded

		that is not necessary for it to be cited in policy. Instead, this has been referenced with the policy's supporting text.
Guildford Residents' Association		
Policy para (2)	This might be rephrased to have walkways as the primary aim, with cycle routes where appropriate.	The National Trust controls most of the towpath along the Wey through the town and town centre. The towpath is shared between different users, and it is not a designated cycle route. Because of this, the policy has been purposefully written in a more general tone, setting out the key considerations and principle that is applicable for all forms of public access.
	Request the inclusion of a requirement to take views into account. In the town centre, there is an SPD to cover this point, but the issue is important for the whole length of the river in the borough.	Agreed - The policy has been amended to include specific reference to the protection and enhancement (where possible) to key existing views, to, from and along the river including those identified in the Guildford Town Centre Views SPD.
Weyside Urban Village		
	Suggest that connecting existing communities to the river that may not experience direct links is explicitly referenced as key objective.	Agreed - The policy has been amended to state that development proposals should be seeking improvement to visual and physical public access to and along the river, not only by providing direct, safe and clear public access, but also by a 'joined-up' approach with the consideration of access and uses up and down stream, as well as across the river channel.
Guildford Society		
	Policy D11 corresponds to 2003 Policy G11. It requires new development to 'protect or improve' the corridor under five headings which broadly match the Objectives of the first paragraph of the new Policy. It is not quite clear that the five numbered requirements of the new Policy will cover all the five 2003 headings. For example 'special historic interest' is not the same as 'special character of the landscape and townscape' (2003 G11 (2)), and there is no wording like 'Views both within and from the corridor' (2003 G 11 (3)). The new Policy should be enhanced as	Amendments have been made to the policy so that it now includes a specific reference to the protection and enhancement (where possible) to key existing views, to, from and along the river including those identified in the Guildford Town Centre Views SPD. The policy now also now makes specific reference to both 'water frontage character' and 'historic interest'.

	necessary to complete the coverage. There should be a point on views from and into the corridor. Also, point (1) last sentence could read “High quality design and appropriate scale will be expected.”.	
	Flood Prevention measures should be provided in a manner that consists of static measures (Bunds, Flood Plains, and Buildings) that minimise use of Floodwalls and moveable gates.	LPSS Policy P4 addresses the strategic issue of flooding, and development in flood zones. The focus of this policy is to ensure that where development/redevelopment is appropriate, it is of a high-quality design that respects the distinct character of the Navigations and the policy has been amended so that this extends to flood mitigation.
	There needs to be a strong aspiration to provide over time Wey side paths on both sides of the navigation from the Ladymead Bypass south to the Rowing Club.	Whilst such aspirations are not specifically mentioned within the policy, there is confidence that the content and structure of the policy would not necessarily inhibit these potential ambitions, in fact is likely to contribute to delivery.
West Horsley Parish Council		
Policy para (5)	Should make reference to Dark Skies	The matter of dark skies and light impact is addressed in emerging policy D10a Light Impacts and Dark Skies. Given that the plan is to be read as a whole it has been concluded that is not necessary for it to be cited in policy. Instead, this has been referenced with the policy’s supporting text.
Residents for Guildford and Villages / Guildford Green Belt Group		
	Local Plan 2003 Policy G11 contained a requirement under policy 3 for the protection of views to and from the corridor to be protected or improved as part of any development proposals. This is a key aspect of the corridor and reference to this should be included within any detailed text for policy D11 in the next iteration of the DMP.	The policy now includes a specific reference to the protection and enhancement (where possible) to key existing views, to, from and along the river including those identified in the Guildford Town Centre Views SPD.
National Trust		

	<p>The Trust supports the overall objective that any future policy would seek to achieve but would ask that reference be made to its Conservation Area status and therefore that significance must be a consideration in any future criteria.</p>	<p>The Navigation's conservation status has been highlighted within the supporting text of the policy. However the policy does not make it clear that proposals are expected to contribute to the continued preservation or enhancement of the Borough's heritage assets, thereby capturing not only the Conservation Area, but also any other heritage assets (statutory and locally listed buildings, historic parks and gardens and scheduled monuments/archaeology) within its proximity</p>
	<p>The Trust is disappointed that reference has been removed to the Trust's Planning Guidelines as these give greater direction to ensuring that proposals either adjacent to or within the setting of the River and Navigation respect the different and distinctive characters of the feature as it travels through the Borough. We would request that consideration be given to the reinstatement of this as a supporting document alongside specific mention of the Trust as the major stakeholder in any development proposals which affect the River and Navigation.</p>	<p>The 2003 Local Plan policy never directly cited these guidelines, instead, reference to it was provided within the supporting text. Therefore, we have replicated this approach again.</p>
	<p>The Trust supports the aspiration for buildings and spaces to better integrate with the River and Navigation but would wish to see a policy that ensures that any development is of an appropriate use, form, massing, scale and design for any particular site alongside the water and that there will need to be a balance between the desire for development and the fact that much of the River and Navigation has historically had little or no development along much of its length.</p>	<p>Agreed. To strengthen this particular point the following amendments to the Policy have been made:</p> <ul style="list-style-type: none"> • Development will only be supported where it protects or enhance the distinct character of the River Wey and Godalming Navigations, in particular their visual setting, amenity, ecological value, and architectural and historic interest. • The need to protect and where possible enhance key existing views • Establish a positive relationship with the Navigations setting and waterfront character and its historic interest. • The protection/conservation of landscape features, building, structures and archaeological remains that are associated with the river's unique history and heritage.

	The Trust would welcome the opportunity to enable greater access, however it is considered that the importance of it for nature conservation and biodiversity should not be undermined and that additional paths alongside it may be of less benefit than creating better links from the surrounding area to the existing towpath.	Agreed - To address this the policy now specifically states that proposals within or adjoining the corridor should seek to improve visual and physical public access to and along the river, providing that this would not result in conflicts with other key interests' including the ecological conservation value.
	The Trust would also be cautious about encouraging a lot of additional boat access which could lead to proliferation of development alongside the River and Navigation for storage of the craft and would undermine the character and appearance of the Conservation Area.	Agreed - References to boat access and boating activity has been omitted from the policy
	The Trust would like to see no increase in lighting levels affecting the River and Navigation to protect the character of the Conservation Area and the nature conservation value of the corridor.	The matter of dark skies and light impact is addressed in emerging policy D10a Light Impacts and Dark Skies. Given that the plan is to be read as a whole it has been concluded that is not necessary for it to be cited in policy. Instead this has been referenced with the policy's supporting text.
Compton Parish Council		
	Would like to see the policy extended to include specific ruling on the prevention of pollution or deterioration of water quality of the River Wey and the Guildford and Godalming Navigation.	The matter of water pollution is addressed in emerging policy P12 Waterbodies and Riparian Corridors.
Portland Capital		
	request that the policy wording provides greater clarity with regards to the definition of 'in the vicinity of the River Wey' and specifics for locations where points 2 and 3 of the preferred option will apply. Any requirement for wholesale sensitive design could undermine the delivery of some sites that sensitively approach the river and its setting, but which also have other contexts and characters to respond to (such as industrial or larger scale development) which can still be successfully designed.	Agreed – The phrase 'in the vicinity of the River Wey' has been omitted from the policy and the supporting text of the policy now provides a definition of what the Corridor of the River Wey and Navigations includes.

	points 1-3 of the preferred option are framed as being aspirational within emerging policy wording. A hard and fast requirement for the proliferation of walkways through all riverside sites (point 2 for example) could lead to issues with securing adequate standards of privacy and security which won't be appropriate on all sites (particularly those with limited site area).	This is something that is addressed the supporting text of the policy by caveating that improved public access to and along the river would be sought where it is not in conflict with other policies and management priorities and objectives, including those of the National Trust.
	Request that wording includes reference to viability, reflective of Paragraph 67 of the NPPF	The requirements of this policy constitute good design. There is scope for decision makers to consider viability on a case-by-case basis where there is justification for doing so.
	There are potentially significant benefits of enabling sites which currently detract from the River corridor that could be jeopardised by over-burdening such sites with specific policy requirements. Policy should set out broad aspirations that would encourage development within the corridor, rather than policy detail that would discourage redevelopment of such sites.	The policy has been prepared with consideration to paragraph 16(b) of the NPPF which sets out that Plans should be prepared positively, in a way that is aspirational but deliverable.
Reach Plc		
	there needs to be a balance between seeking high quality design and addressing viability.	Viability concerns should not result in poor quality design. There is scope for decision makers to consider viability on a case-by-case basis where there is justification for doing so.
Burpham Neighbourhood Forum		
Policy para (1)	The design of new development in such a sensitive location needs to give full weight to physical matters such as erosion, Navigation speed, flood plains and general integrity of the banks. We are concerned well-meaning attempts to integrate the Navigation and its environs with future residential development could lead to fundamental changes to the gravel banks of this heritage location, resulting in the replacement of the picturesque plant strewn gravel banks with steel piling and the urbanisation of the Navigation, destroying it forever.	To address this, the policy has been amended to make clear that the design of new developments should, amongst other things have a regard to the distinctive riverside setting and waterfrontage character and the protection and conservation of landscape features. This matter also has relevance to contents within emerging Policy P10a: Watercourses & Riparian Corridors

Policy para (2)	Could cause damage to the environs by excessive use. Specific mitigation proposals should be requested as part of the development proposals.	This particular point has been addressed within the policy's supporting text. Firstly, by caveating 'where it is not in conflict with other policy and management priorities and objectives, including those of the National Trust' and secondly, by informing that design should seek to avoid harm to any nature conservation value that might exist on banks and habitats adjacent to the waterway.
Shalford Parish Council		
	would like to see reference to the Tillingbourne river and the canal system in conjunction with this	The policy is specific to the Navigation as it is a landscape and historical feature of significance and the pressure for development along its course has increased over the past few years. Nevertheless, emerging Policy P10a: Watercourses & Riparian Corridors is applicable for every watercourse within the Borough, including the Tillingbourne.
G-BUG		
	Also add: provide or contribute to more or better pedestrian and cycle crossings of the River, and to improving the towpath surface, with a long-term durable surface across the Borough. (The towpath can provide a greenway through the town. The surface has been improved from the town centre to Woking Road, but this is already breaking up.)	The request that the policy provides or contributes to more or better pedestrian and cycle crossings of the river is being addressed in a more general way, with the policy stipulating that support will be given to development proposals which <ul style="list-style-type: none"> • provide a 'joined up' approach to river access, considering access and uses up and down stream, as well as across the river channel and adjoining areas to the existing towpath. With regards to the request for improvement to the towpath surface, this is beyond the scope of the policy. However, the policy does make it clear that there is an expectation for proposals to provide safe public access.
Other respondents		

	There will need to be clarity over the access for walkers and bicycles, which are not always compatible.	This is beyond the scope of the policy. However, clarity regarding pedestrian priority has been provided within the supporting text.
	Policy should reference views within, to and from the River Wey Corridor	Agreed - The policy has been amended to provide this clarity.
	Specific guidance on heights of buildings compatible with the river	Disagree – Appropriate height is something that is specific to context. Given the distinct variability in character and composition of the Navigation it would difficult
	The individual character of different sections of the river, both in rural and town parts, should be protected in a sentence in the Preferred Option box. (The character of the river becomes rural very soon after leaving the town as it passes Shalford Meadows.)	The has been amended to state that development proposals are required to conserve and enhance the distinct character of the Navigations.
	The river should be kept as natural possible and any potential extra access points should not detract from this.	This is addressed through the emerging Watercourses & Riparian Corridors policy (Policy P10a) whose aim is to reference and balance the importance of watercourses and their riparian corridors as a water resource, habitat and wildlife corridor and to ensure that their physical form is protected and/or enhanced, as well as their water quality and quantity.
	Add: 'Preserve the green nature of the river corridor'	The policy addresses this by referencing the conservation and enhancement of visual setting, amenity, ecological value within Policy D11 – Corridor of the River Wey and Guildford and Godalming Navigation. However, it is more widely addressed in the emerging Watercourses and Riparian Corridors policy.
Policy para (4)	This needs to allow for the possibility that the existing landscape simply needs to be managed appropriately to support existing biodiversity that could actually be damaged by “improvements” (including access arrangements) and planting schemes.	This will be managed in part by this policy, by means of stipulating that development is required to conserve and enhance the distinctive character in respect of visual setting, amenity, ecological value, but also through the emerging Watercourses & Riparian Corridors policy (Policy P10a), whose aim is to reference and balance the importance of watercourses and their riparian corridors as a water resource,

		<p>habitat and wildlife corridor and to ensure that their physical form are protected and/or enhanced, as well as their water quality and quantity.</p>
	<p>The corresponding 2003 Policy is G11. It requires new development to 'protect or improve' the corridor under five headings which broadly match the Objectives of the first paragraph of the new Policy. It is not quite clear that the five numbered requirements of the new Policy will cover all the five 2003 headings. For example 'special historic interest' is not the same as 'special character of the landscape and townscape' (2003 G11 (2)), and there is no wording like 'Views both within and from the corridor' (2003 G 11 (3)). The new Policy should be enhanced as necessary to complete the coverage. There should be a point on views from and into the corridor. Also, point (1) last sentence could read "High quality design and appropriate scale will be expected."</p>	<p>The policy has been amended to provide specific reference to the protection and enhancement (where possible) to key existing views, to, from and along the river including those identified in the Guildford Town Centre Views SPD.</p> <p>It also set requirement for proposed development to establish a positive relationship with its setting and waterfront character and its historic interest. This in turn is supported by text within the Reasoned Justification which provides additional clarity and guidance on the matter of design, including confirmation that emerging Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness will be used to guide development.</p> <p>Equally, as the Navigation is sited within Conservation Areas throughout its entire length, applications will also be required to be considered against emerging Policy D18: Conservation Areas, which provides further design policies by which an application can be assessed against.</p>

Policy D12 Sustainable and Low Impact Development		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		
	Agree	Noted
Highways England		
Policy para. 2	We support the approach of managing down demand on the SRN by reducing the need for building materials to travel long distances where there is local availability.	Noted
Environment Agency		
	<p>Do not agree. The document does not mention how water efficiency will be managed.</p> <p>We would expect to see reference to the water company's Water Resource Management Plan.</p> <p>Water efficient development should be promoted and a target usage figure per household stated. The national mandatory standard is 125 litres/person/day. However, we seek a more ambitious, and future thinking, target of 110 litres/person/day. This is in line with practices of other local authorities in our area, and is set out in Planning Practice Guidance.</p>	<p>A reference to Water Resource Management Plans for the relevant water companies has been added to the supporting text.</p> <p>The Council has already implemented the 110 litre standard through policy D2 of the Local Plan: Strategy and Sites.</p>
Surrey Nature Partnership		
	Supported	Noted
Surrey County Council		
	As the Minerals and Waste Planning Authority, Surrey County Council would support the preferred option, in particular the 'Waste' section of Policy D12 and the intention to	Noted

	provide additional detail for Policy D2 1a) and b) that requires the efficient use and reuse of mineral resources and waste minimisation.	
	Para 5.67. For the sake of clarity it should be mentioned that the emissions reductions achieved nationally are against 1990 levels.	This amendment has been made.
	A requirement should be included under para 2 of Policy D12, for a whole life cycle carbon assessment to be undertaken, using the RICS lifecycle stages. The Mayor of London has also recently issued guidance on how these assessments should be undertaken.	<p>The proposed policy implements requirements that substantially cover life cycle analysis (LCA) e.g. by looking at embodied carbon, use of land and buildings in the longer term and the long term use of land and buildings in a manner that fits in with current planning processes. Implementing an LCA requirement would introduce a new process for developers and therefore add costs to development which affects viability and our ability to collect other benefits.</p> <p>The London Guidance is post-consultation at present and is intended to apply only to applications referred to the Mayor (e.g. 150 homes or greater), though the mayor encourages boroughs to include it in their plans.</p>
	Surrey's Climate Change Strategy: Surrey's Greener Future was approved by the county council in May 2020. It is suggested that this document, which reflects the shared ambition of Surrey's 12 local authorities and has benefitted from the input of Guildford Borough Council, might be usefully referred to in the proposed submission version of the DPD or alternatively within the Climate Change SPD. The consultation on the SPD preceded the finalisation of the Climate Change Strategy document. A link to this document can be found here: https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy	A reference to the document has been added to the introduction of the climate change section.
Other organisations		

Thames Water		
	The policy should implement the water efficiency standard for dwellings of 110 litres per person per day through the use of a planning condition.	The Council has already implemented this standard through Local Plan: Strategy and Sites policy D2 and applies an appropriate condition to new residential developments.
Taylor Wimpey		
	The policy should be altered to refer to the emerging Draft Climate Change, Sustainable Design, Construction and Energy Supplementary Planning Document. It is essential that this SPD and the DMP document are aligned.	SPDs provide guidance for adopted policy and policy takes primacy. It is the role of policy to establish standards and set principles, and policies are not bound by SPDs. If the SPD is not consistent with this policy when it is adopted, the SPD will be revised.
	Detail on the matters covered by the policy should be left to the SPD. The basis of this policy should have been tested in the Local Plan 2019. Therefore, this policy is unnecessary and should be deleted and TW support the alternative option of not having a specific policy but relying on the adopted Local Plan and SPD (when adopted).	The preferred option would provide a policy covering fabric first, embodied carbon, site waste management plans and water efficiency beyond the 110 litres standard for dwellings. These provisions are addressed in the SPD but are currently missing from policy. Adding them into policy gives them policy weight, rather than the weight of SPD guidance. As these are important matters, we think they should benefit from policy weight.
	If GBC are minded to include this policy, TW do not have any specific comments on the preferred option wording other than in part 5 amending 'possible' to 'appropriate'	We do not agree with this suggestion. In an area of severe water stress,

		<p>water saving measures will always be appropriate. Using “where appropriate” would suggest that there may be instances when it would not be.</p> <p>The use of “where possible” allows for considerations of viability and feasibility but avoids suggesting that water efficiency may not be appropriate.</p>
	It is essential that GBC consider the viability of developments to ensure that the GBC housing trajectory is not compromised by making developments undeliverable.	The Regulation 19 Submission Local Plan will be subject to viability testing.
Burpham Neighbourhood Forum		
Para 5.65 and policy	[Re: “The buildings we build today are likely to be with us into the next century”] To meet this expectation soft wood timber frame must be excluded from the mix. Soft wood timber frame has a short lifespan and must be excluded from the mix. The timber frame itself is normally "guaranteed" by the manufacturer for various periods ranging from 10 to 40 years. It is a commonly perceived opinion within the industry that 25-30 years is a reasonably expected life span for a softwood timber framed building.	Noted. Construction Material technology is advancing rapidly, and it would not be reasonable to prohibit specific types of material. Planning should instead concentrate on outcomes, which the policy does by considering the lifecycle of new buildings.
Para 5.72	The summary of the national Design Guide 2019 does not include reference to porous surface parking and pedestrian walkways in the design manual please ensure these requirements are reflected elsewhere in Policy.	This requirement has been added to policy the Sustainable Surface Water Management policy.
Para 5.76	Given that further deregulation is forecast due to covid 19, policies need to be carefully written to ensure longevity past these events.	Agreed. The policy is compliant with the current proposals set out in the Future Homes consultation material. The Council will continue to monitor events at a national level and new legislation.

Para 5.77	The council should not be afraid of imposing a higher minimum standard [than the proposed new standard set out in the 'Future Homes' consultation] if appropriate. For instance: Ventilation standards 'cannot change' as the amount of fresh air / room capacity when air tight requires sufficient volume for the number of people sleeping to survive an eight to ten hour sleep period without dying of lack of 'oxygen' this policy should refer to BS EN 15251:2007.	Noted. All buildings are breathable to some degree and improvements to airtightness standards will not lead to a risk of suffocation. The safety of new buildings is governed primarily by the Building Regulations.
Para 5.85	Energy need can be eliminated by reducing travel and having movement sensors on road lighting.	Agreed. Street lighting is a matter for Surrey County Council and Highways England for local roads and A roads/motorways respectively.
Para 5.85	Smaller wattage items improve energy efficiency	Noted. The Council's Climate Change, Sustainable Design, Construction and Energy SPD covers unregulated emissions (e.g. the emissions resulting from power use in electrical appliances) drawing on the clause in Policy D2 that requires schemes to enable sustainable lifestyles. As a result, developers often commit to installing low energy white goods. However, appliances cannot be governed directly by planning policy as installing them does not require planning permission.
Para 5.90	Maximising air-tightness: see BS EN 15251:2007 note: airtightness increases condensation in dew point areas.	Building Regulations govern the internal comfort of new buildings, including damp.
Para 5.90	High levels of insulation can cause over heating in properties particular New Builds without adequate ventilation.	Agreed. Improved insulation should be accompanied by adequate ventilation and measures to control solar gain during hot periods. Policy D13 addresses climate change

		adaptation, which includes overheating.
Para 5.91	It is not correct to state that renewable and low carbon energy systems often require more upkeep and maintenance than design and fabric measures. This could discourage retrospect installation of such systems. Solar Hot water and PVP electricity cost virtually nothing year on year and requires no 'annual' maintenance (solar hot water needs checking 1 every five years).	It is not the intent to discourage retrospective installation of renewable energy systems. However, a well-designed building with good fabric can last hundreds of years with often minimal maintenance whereas energy systems will inevitably need some level of maintenance, and key components (e.g. solar panels, inverters, pumps) will need replacement throughout the life of the building. As a result, the energy hierarchy prioritises demand reduction measures over low carbon energy.
Para 5.92	Agree that it can be difficult to retrofit energy efficient design or fabric to completed buildings but should be encouraged during refurbishment stage when it added for very little cost to the project and take up of grants should be encouraged.	Noted.
Para 5.93	Damp is a factor of Dew Point not simply poor ventilation, and 'cold internal walls' are as serious a factor as poor ventilation.	The text has been amended to refer to energy efficient, warm and well-ventilated homes.
Para 5.105	There is a Borough shortfall of 4.5million cuM per year of water for the proposed new developments in part 1 of the Local Plan	The Local Plan part 1 policy ID1 requires infrastructure to be available to support new developments when first needed, which would include provision of water infrastructure. Water Resource Plans produced by the water providers plan a range of measures to address any identified deficits.

Para 5.93	The water efficiency standard does not address the need for adequate water to 'flush' through external pipes. It is unknown at a national level how much water is needed in practice to flush down a 115mm diameter sewer pipe a distance of 100 metres at various angles (normally 1:80). By way of example, it is known in Germany, where they have reduced the 'flush' to just 5 litres, there are now serious clogging issues in German sewers. 19 litres the old standard British cisterns 'work' while 10 litres can also work. Great care stipulating water usage and amount needed to 'flush to the main sewer' must be included.	The water efficiency standard is a national standard developed with input from the construction industry and other stakeholders. Thames Water, the sewerage undertaker in our borough, support the standard.
National Trust		
	Agree with the policy but it should reflect the potential limitations where development involves heritage assets or may have potential impacts on protected species eg: bats and loft insulation.	It is agreed that there can be conflict between different strands of planning policy. The plan is read as a whole and includes protections for heritage and biodiversity. The policy acknowledges the possibility of conflict between sustainable construction materials and heritage but we don't consider it necessary to identify other potential areas of conflict as the planning process allows these to be balanced.
Send Parish Council		
	Strong reference needed to the reuse of existing buildings and demolition materials given that construction waste accounts for around a third of the UK's construction and demolition business.	The policy includes a requirement for new developments to consider lifecycle emissions, which includes adaptability to extend their useful lives and how construction materials can be reused or recycled after demolition. The policy includes support for retrofitting of existing buildings to improve energy efficiency and carbon emission rates. This will help

		<p>increase the longevity of existing buildings.</p> <p>Existing policy on waste (in Policy D2 of the LPSS) and the proposed new requirement for Site Waste Management Plans refer to established methodology on waste management which promotes the reuse of demolition materials.</p> <p>Beyond this, it would not be reasonable to seek to restrict or prohibit the demolition of buildings or disposal of waste materials.</p>
	<p>Policy should require applicants to provide facilities to charge electric vehicles and adequate onsite storage for recycling. Provision by dwelling buyers should not be accepted.</p>	<p>Provision of EV charging points is addressed under ID11 Parking Standards.</p>
<p>Guildford Society</p>		
<p>5.98/policy para. 3</p>	<p>The text states “Demolition and rebuilding, and even refurbishment and retrofitting, create carbon emissions.” However, buildings should be designed to have flexibility to accommodate a variety of uses, thus emissions can be reduced or avoided when the use is changed.</p> <p>Paragraph 3) should be amended to read “Expects developments to consider the lifecycle of buildings and public spaces, including how they can be adapted and modified to meet changing social and economic needs, <u>this includes designing in the ability to change use if prefabricated components e.g. Bedroom modules, are used,</u> and how materials can be reused or recycled at the end of their lifetime.”</p> <p>An extra paragraph should be included: “There will be a presumption to favour schemes that re-use and re-purpose existing buildings, provided resulting revised building complies with standards of accommodation for new buildings.”</p>	<p>Agreed. Para. 3 of the policy covers the lifecycle of buildings and the supporting text explains that this includes consideration of the flexibility and reuse of buildings. The proposed amendment to paragraph 3 is too detailed for the policy but has been added to the supporting text.</p> <p>A new paragraph has been added that supports proposals to improve energy performance and carbon emission rate of existing buildings. This will support repurposing. However, a blanket presumption in favour of re-use or repurposing has not been added as this would provide</p>

		unqualified support for every change of use application, regardless of whether improvements have been made to the building. Our view is that were a building is being repurposed, developers should take advantage of the opportunity to significantly improve its energy performance in order to receive support.
	The policy should reference BREEAM and PassivHaus standards.	The Climate Change, Sustainable Design Construction and Energy references BREEAM and Passivhaus standards as an alternative route to permission (as opposed to submitting the information required by Policy D2). The Council does not intend to introduce these standards as mandatory standards, so references has not been added to policy.
Woodland Trust		
	Any associated guidance should include the value of timber as a low carbon construction material, in particular as an alternative to concrete.	The recently adopted Climate Change, Sustainable Design, Construction and Energy SPD includes guidance on embodied carbon and sets out the benefits of timber.
Merrow Residents' Association		
	Agree with the preferred option. We also support, in particular the comments on water efficiency as Guildford is under serious water stress (para 5.105) and far too much water goes to waste. However, this should be a requirement and not an expectation.	Expect is used in this instance as it is likely that some developments will not be able to include water harvesting measures (e.g. commercial units or apartments that

		<p>have no attached green space and no requirements for irrigation). However, the word “expect” indicates that it should be provided in most cases.</p> <p>Water recycling and reuse schemes introduce building services that are currently unusual and would therefore have a viability impact. As a result it would be unreasonable to require them on all developments.</p>
Policy para 1).	<p>Interpretation of “fabric first” should not apply only to the building fabric but also to the engineering systems employed. Optimal heating systems should be selected that are more sophisticated than crude gas boilers. Examples of aspects that should be considered are: fully integrated multi-disciplinary design, selection of most appropriate heat source and F&R [flow and return] operating temperature range, minimisation of piping heat losses and avoiding the need to replace systems to meet known climate change requirements (e.g. zero carbon 2050).</p>	<p>Energy efficient building services do not form part of the definition of fabric first. This approach is in line with the energy hierarchy, where elimination of energy need comes before efficient use of energy.</p> <p>However, the extant requirement in Policy D2 for developments to follow the energy hierarchy ensures that at stage 2 of the hierarchy developers will seek to reduce emissions by utilising the measures including those identified in the comment.</p>
	<p>The policy should include adequate scrutiny of the competence of the parties executing the design and installation and commissioning of the buildings. This is currently not covered.</p>	<p>Planning decision makers can only consider the development proposals before them and not the identities of the people carrying out the work. However, for some technical documents (like energy and sustainability statements) it is usual for the person completing the document to provide information covering competence, and this has</p>

		been highlighted in the Climate Change, Sustainable Design, Construction and Energy SPD.
	Whilst references to embodied carbon are included, Policy D12 should address this subject more fully.	Noted. The policy and supporting text set out a requirement for developments to limit embodied carbon and an approach for assessing whether that has been achieved. The SPD provides further detail.
Guildford Bike User Group (G-BUG)		
	Should include the need for, and key role of, providing sustainable transport options, with cross-reference to Policy ID10.	Policy ID3 of the Local Plan: Strategy and Sites 2015-2034 requires developments to maximise the use of sustainable transport. The plan is read as a whole so the requirement does not need to be repeated in this policy. ID10 will provide further detail regarding the cycle network.
Holy Trinity Amenity Group		
	Demolition of modest homes with a useful life left for replacement by mansions that are profligate in the use of materials and energy is wasteful. The loss of embodied energy should be considered and stated when demolition is proposed.	The policy includes clauses which promote the continuing use of existing buildings. The loss of small dwellings is not covered by this policy.
	Swimming pools, open plan designs and extensions are generally energy and material wasteful. These should be resisted/banned.	Internal changes to buildings are generally permitted development and outside the remit of planning policy.

		Banning swimming pools or extensions would go beyond the remit of the Local Plan.
Residents for Guildford and Villages / Guildford Green Belt Group		
	The preferred option under part 4 of the policy in relation to waste sets the trigger for simple or more detailed site waste management plans according to the estimated cost of the development. It is highly unusual to have a trigger within a planning policy to be based on the cost of a proposed development, which in any event is often unknown until after planning has been granted. It is therefore recommended that the wording of the policy is altered to require a different trigger, preferably scheme size, for the varying requirement in relation to site waste management plans.	The policy has been amended so that the trigger for a Site Waste Management Plan being required is Major Development, demolition of at least one building or engineering works involving the importation and exportation of material.
Weyside Urban Village		
Policy para 3)	Criterion 3 could explicitly reference earthworks material to ensure all types of material generated by a development site are considered.	Earthworks material would be included under waste. Paragraph 4 would require consideration of how this will be reused.
	There is complication through excessive layers of policy and documents through interaction and conflict with the emerging Climate Change, Sustainable Design, Construction and Energy SPD. Should all GBC documents be adopted, then the local policy position would include Local Plan: Strategy and Sites Policy D2, Local Plan DM Policy D12 and the SPD, on top of the NPPF and Building Regulations, the latter through which the Government wish to control energy efficiency in particular. There would appear to be an element of duplication and unnecessary complication that could be reviewed for the topic as a whole at the local level.	The Council has declared a climate emergency and it is necessary that Local Plan policy is drafted to address that declaration. SPDs form guidance and will be reviewed to ensure they are consistent with policy and improve the decision making process by providing guidance that helps interpret policy.
Guildford Residents' association		
	We suggest that consideration be given to extend the coverage to include repurposed buildings to improve sustainability as far as is practicable.	A reference to the reuse of existing buildings rather than demolition has been added to the policy.

Hallam Land Management		
	One potential outcome of incorporating measures that these policies [D12 and D13] require is that the design and appearance of new housing is different in the future. This will require a balance to be struck with other policies which encourage new development to respect local vernacular, particularly in areas in the locality of designated historic assets.	This point is addressed under D13.
West Horsley Parish Council		
	Agree. Strong reference needed to the reuse of existing buildings and demolition materials given that construction waste accounts for around a third of the UK's construction and demolition business.	A reference to the reuse of existing buildings rather than demolition has been added to the policy.
Other respondents		
5.94 to 5.98	Support for the consideration of embodied carbon. The overall carbon cost and ongoing emissions of a proposed development should be assessed and compared with any carbon sequestration that is possible if the land is left undeveloped (or is possible with previously developed land that has lost most or all of its buildings). The overall carbon cost should include the additional motor vehicle journeys that will be generated and the embodied carbon of increased motor vehicle useage and associated demand for new vehicles. The carbon payback period should be considered. If there is no payback, or the period is too long (e.g. greater than 10 years), then the development should only go ahead in genuinely exceptional circumstances. All development carbon costs should count against the national carbon budget.	The proposed measures are very strict would likely result in a high number of refused planning applications and as such would not be considered reasonable.. The potential for carbon sequestration on undeveloped land is subject to the behaviour of the current landowner, which is outside the scope of planning policy (except change of use).
Policy para. 2a	2a) [sourcing materials locally where possible] could be applied to buildings that require specific materials for heritage or conservation reasons.	The policy has been redrafted to that local sourcing applies to all developments. The exception for heritage/conservation is explained in the supporting text where it states the rules may be relaxed for heritage reasons.

	<p>All buildings should be carbon neutral.</p>	<p>In order for the local plan to be found sound, we must be able to demonstrate that the policies as a whole are financially viable and do not undermine the deliverability of the plan. A policy requiring new developments to be carbon neutral would have a significant impact on viability which would restrict the council's ability to seek other benefits, such as affordable housing and infrastructure. Achieving sustainable development means that the planning system has three overarching objectives, which are independent and need to be pursued in mutually supportive ways (para 8 of NPPF).</p>
	<p>All buildings should incorporate solar panels on the south facing side of the roofs</p>	<p>It would not be reasonable to mandate a particular technology given that circumstances differ from site to site and that low carbon technology is developing rapidly. However, the Council's existing policies on carbon reduction have led to solar panels being installed on new buildings with flexibility that allows developers to choose alternative options where appropriate.</p>
	<p>Rainwater harvesting systems should be on new buildings.</p>	<p>Policy D12 includes a requirement for water harvesting.</p>
	<p>If new buildings are not going to be zero carbon in operation (gas heating etc), they should be able to become zero carbon at minimal future cost?</p>	<p>The national plan for the UK is to decarbonise electricity generation</p>

		<p>whilst moving heating away from gas and oil to electricity.</p> <p>The best way to prepare buildings for a zero carbon future with all-electric heating is to ensure they take a fabric first approach and deliver good levels of energy efficiency. The policy introduces an explicit fabric first principle.</p>
	<p>The policy/policy aims are in conflict with the level of growth proposed in the Local Plan: Strategy and Sites.</p> <ul style="list-style-type: none"> • The water reserves in the borough are not adequate to meet the proposed level of growth. Population growth would be generated by the local plan area population. It relies on moving large numbers of additional people into a region that “is already under severe water stress”. Demand will not be met. No confidence in the vague statements made by water suppliers • 5.85 shows that eliminating energy need is the first priority – incompatible with growth. 	<p>The LPSS was found sound by an independent planning inspector. One of the tests of soundness is whether it is sustainable. Sustainability comprises the balancing of environmental, social and economic considerations.</p> <p>A local plan cannot eliminate energy need by refusing growth as this would not meet national requirements for local plans.</p>
	<p>Close collaboration with other Councils and indeed other countries should be established.</p>	<p>Surrey County Council has a strategy entitled “Climate Change Strategy: Surrey’s Greener Future”. The document sets a framework for coordination among Surrey districts and the county council. The drafting of new policies has regard to this document and throughout the plan making process we are required to discharge our legal Duty to Cooperate, which requires cooperation with other Councils on strategic cross-boundary issues.</p>

		<p>Collaboration with other countries is generally outside of the remit of the Local Plan, though as a sister city of Freiburg officers and Councillors attend international events to discuss climate change and decarbonisation. The Council is a member of the Association of Public Service Excellence (APSE) and is engaged with the energy which enables communication and collaboration with other councils nationally.</p>
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Policy D13 Climate change adaptation		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey County Council		
	<p>Surrey's Climate Change Strategy: Surrey's Greener Future was approved by the county council in May 2020. It is suggested that this document, which reflects the shared ambition of Surrey's 12 local authorities and has benefitted from the input of Guildford Borough Council, might be usefully referred to in the proposed submission version of the DPD or alternatively within the Climate Change SPD. The consultation on the SPD preceded the finalisation of the Climate Change Strategy document. A link to this document can be found here: https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy</p>	A reference to the strategy has been included in the supporting text.
Natural England		
	<p>Natural England recently published a 2nd edition of its Climate Change Adaptation Manual which includes a Landscape Scale Climate Change Assessment Tool. This tool can be used to identify natural assets (e.g. different habitats and species) in the borough and identify adaptation responses that can be incorporated into a plan to create a resilient landscape across the borough.</p>	Comment addressed in Biodiversity section
	<p>Consideration could also be given to whether the plan recognises the role of ecosystems and soils in carbon sequestration. A strategic assessment of natural assets and Green Infrastructure across the borough can be useful in planning for increasing borough resilience to climate change.</p>	Comment addressed in Biodiversity section
Surrey Nature Partnership		
	Supported.	Noted

para. 5.113	Cross-references to requirements for SuDs (Sustainable Drainage Systems) and NFM (Natural Flood Management) could be added here; and NFM could be mentioned in relation to 4(e) in the actual policy.	A reference to policy P13 which covers SuDS and NFM has been added to the policy and supporting text. The policy now only refers to waterbodies as it is not necessary to replicate policy in P13.
Environment Agency		
	We welcome the inclusion of the retention and incorporation of green and blue infrastructure. Please refer to comments relating to river corridors and how provision of green infrastructure can contribute to adapting to climate change.	This is addressed under the biodiversity and design sections.
Other organisations		
Weyside Urban Village		
	Criterion 3 could include reference to building flood resilient housing as another measure to assist in minimising the urban heat island effect.	Policy P4 of the LPSS already requires development in flood zones to accord with national policy, which primarily means not building vulnerable development in areas of flood risk. However, where the tests for doing so set out in national policy are met, it requires schemes to “incorporate flood protection, flood resilience and resistance measures appropriate to the character and biodiversity of the area and the specific requirements of the site” in areas at medium or high risk of flooding, as well as setting requirements for safe access and egress and flood warning systems. The proposed change has not been added to the policy as it would imply that building houses in areas of flood

		risk is commonplace or routinely acceptable, which does not accord with policy P4 or national policy.
Send Parish Council		
	The policy should tie into the climate emergency declared by the Council.	The climate emergency is discussed in the introduction to the climate change section. The policy addresses adaptation to the expected impacts of climate change, whereas the climate emergency declaration refers to climate change mitigation (preventing climate change).
Merrow Residents' Association		
	It seems a little odd that D13 is separated from D12 as adaptation should be integrated into and within sustainable low impact development. The essential link between D12 & D13 should be emphasised.	D12 covers climate change mitigation (among other things) whereas D13 covers climate change adaptation. It is agreed that the issues are linked. However, we have separated them into two policies in order to make the plan easier to read.
	We are building homes that are not fit for purpose and will need to be retrofitted at great cost to building owners. The UK is "not making adequate progress in preparing for climate change" (Committee on Climate Change).	Noted. The Council is taking steps at local level, both through planning and other functions. There are limits to the action that can be taken at a wholly local level and through the Local Plan. It is agreed that national action is necessary and the Council is monitoring developments regarding the Future Homes and Future Buildings standards.

Guildford Residents' Association		
	The policy needs to add specificity to D2 to improve implementation. Suggest a suitable reference to a 'cooling hierarchy'.	The policy refers to the cooling hierarchy. Additional text has been added to the supporting text to explain what this means.
	Does 'scheme' here refer to all projects, irrespective of size?	"Schemes" has been changed to "New developments" for clarity.
Guildford Society		
	D13 introduces requirements to prevent overheating, and to cope with more frequent and severe rainfall events. It is not clear how the overheating prevention measures interact with other Policies.	It is acknowledged that there can be a conflict between low energy design that maximises solar receipts for passive warming and the need to prevent overheating as a climate adaptation measure. However, good design can the intended benefits while avoiding the unintended disbenefits and guidance is set out in the Council's Climate Change, Sustainable Design, Construction and Energy SPD covering that.
	There needs to be a clause to encourage the use of small-scale energy generation technology e.g. PV Cells	The energy hierarchy states low carbon energy should only be encouraged after energy efficiency is maximised. Policy D2 supported by proposed policy D12 promote a fabric first approach. Alongside this, policy D2 of the Local Plan: Strategy and Sites requires an overall carbon reduction which can include the use of low carbon energy once energy efficiency has been addressed. In

		<p>this way, D2 encourages the use of small-scale energy generation like Solar PV but in a manner that meets the energy hierarchy. Solar PV has been a popular choice for new developments since policy D2 was introduced.</p>
Surrey Wildlife Trust		
para. 5.113	<p>Cross-references to requirements for SuDs (Sustainable Drainage Systems) and NFM (Natural Flood Management) could be added here; and NFM could be mentioned in relation to 4(e) in the actual policy.</p>	<p>A reference to policy P13 which covers SuDS and NFM has been added to the policy and supporting text. The policy now only refers to waterbodies as it is not necessary to replicate policy in P13.</p>
Woodland Trust		
	<p>Need a more ambitious and strategic approach to deploying natural solutions in urgent response to the climate crisis.</p> <p>Woodland can also help absorb air pollution and improve water quality, assist in control of flood run-off from unseasonably heavy rainfalls, provide shade in hot temperatures for urban environments and offer biodiversity refuges for species under pressure from the rise in temperatures.</p> <p>Increasing tree cover in urban areas can help mitigate the urban heat island: through direct shading, by reducing ambient air temperature through the cooling effect of water evaporation from the soil via plant leaves, and because they do not absorb as much heat as built surfaces. The shading provided by trees can also reduce energy use for heating and cooling buildings. Trees can therefore play an important role in urban climate change strategies.</p>	<p>The benefits of woodland in climate change adaptation are noted and agreed. The deployment of natural solutions would best be addressed through biodiversity policy.</p> <p>Flooding is addressed through other policies, which refer to the use of natural solutions. The biodiversity policies cover the multifunctional benefits of green space.</p> <p>This policy requires scheme to combat the urban heat island effect through incorporation of green and blue infrastructure. This would include the provision of urban trees, which is explained in the supporting text. The use of tree shading to</p>

		prevent buildings overheating is also set out in the Climate Change, Sustainable Design, Construction and Energy SPD.
Hallam Land Management		
	One potential outcome of incorporating measures that these policies [D12 and D13] require is that the design and appearance of new housing is different in the future. This will require a balance to be struck with other policies which encourage new development to respect local vernacular, particularly in areas in the locality of designated historic assets.	It is agreed that energy efficient and climate adapted developments can have a different appearance to more traditional developments. Plans are read as a whole and proposals will need to balance competing needs.
West Horsley Parish Council		
	Reference required to Neighbourhood Plans SuDS schemes.	The Development Plan includes both the Local Plan and Neighbourhood Plans and is read as a whole so planning decisions must take relevant neighbourhood plan SuDS policies into account in areas where these exist.
	Given how critical this is, has this policy been bench marked against other Councils policies known to be exemplary in the Climate Change approach?	Officers and members are aware of the work being undertaken in other local authority areas. The Council works closely with other Surrey Local Authorities through the Surrey Planning Working Group and communicates more widely through the Association of Public Service Excellence (APSE) low carbon energy group.

Ockham Parish Council		
	The GBC stance of July 2019 in stating a climate emergency should ensure that all development is sustainable and low impact and these principles should be stringently adhered to without any compromise. If they cannot be, then consent for the development should be withheld as clearly the site isn't appropriate for the proposal	Noted. This is a matter for planning decision makers taking account of the plan as a whole.
Burpham Neighbourhood Forum		
Para 5.110	We encourage the introduction of water heating pipes within these hot tarmac and concrete areas to cool them down and provide free heating in communal areas to counteract the Urban Heat Island effect.	Noted. Adopted policy D2: Climate Change, Sustainable Design, Construction and Energy requires developers to consider district heating systems where significant sources of heat exist.
Para 5.113	(Re: use of permeable surfaces) Noting that areas of the borough are gravel on clay or straight clay and thus do not have capacity to absorb rainfall or flood water, we recommend use of static flow controls; Balancing pond with trapezoidal weirs, as opposed to mechanical flow controls; gates and pumps.	Permeable surfaces will still provide benefit in areas where subsoil suffers from lower permeability as they will slow down surface water flows. Drainage schemes are considered in detail at the planning application stage and major schemes are reviewed by the Local Lead Flood Authority. Ground conditions will be considered at this point. Policy P12 and LLFA guidance support the use of balancing ponds as a SuDS measure where this would be effective.
Para 5.116	(Re: wildfires) We recommend the installation of water mains at fire hot spots as part of the development, Noting overall inadequate water supply for the Clandon house Fire.	Such a measure would be covered by the requirement for schemes to be designed to prevent the spread of fire.

Policy para 5)	Fire breaks need maintenance to limit growth, thus cannot be left unattended year on year. Such maintenance programmes need to be secured by condition or legal agreement.	Noted. This information has been added to the supporting text. The policy has been amended to refer to management as well as design.
Taylor Wimpey		
	<p>The alternative option seeks to consider planning applications against other relevant policies in the Local Plan (2019) and to rely on guidance in the National Planning Policy Framework and Planning Practice Guidance. TW support this approach, albeit reference should also be made to the emerging SPD.</p> <p>The preferred option for this policy does not require anything more or new from the Draft Climate Change, Sustainable Design, Construction and Energy SPD.</p>	Noted. The Council's preference is to bring forward new policy in order to provide policy support for measures not currently covered by adopted policy. Whilst aligned with the SPD, the proposed new policy will provide greater support for its provisions. The SPD forms guidance and will be updated if and when new policy is adopted and amendments are necessary.
	If GBC are minded to retain the policy, the phrase "where possible" should be changed to "where appropriate" in policy paragraphs 2 and 4h.	<p>The use of passive cooling measures in place of conventional air conditioning (para 2) is appropriate wherever it is possible. If passive cooling measures alone would not be effective, air conditioning can be acceptable.</p> <p>The planning process allows for consideration of appropriateness. While there may be instances where the use of permeable surfaces would conflict with other planning requirements (such as use of materials for heritage reasons), this does not need to be caveated in the policy.</p>

Other respondents		
	It is not clear how the overheating prevention measures interact with other Policies.	The main interaction is with policy that requires the use of solar gain to reduce the need for heating in new buildings. The plan should be read as a whole which means that new buildings should be designed to benefit from passive heating as much as possible while sufficient safeguards are included to prevent overheating during hot weather.
	Although we may see temperature rises it is important to have access to fresh air and to that end opening windows in offices and homes should be encouraged.	This is agreed. Windows that can be opened when necessary are considered a passive ventilation measure and are supported by existing adopted policy and SPD guidance.
	There must be an emphasis on maintaining as much green areas as possible avoiding non-porous hard paving. Overflow should go to soakaway ponds. The sewerage systems must not be linked into any rainwater or surface water system and incorporate overflow tanks to prevent leaking into the natural environment.	Agreed. The policies in the plan seek to preserve green and blue infrastructure and to favour natural water management measures. The plan includes a policy covering SuDS which sets out best practice in sustainable drainage.
	All materials used should be recyclable and not toxic in any way.	The policies and guidance in the plan promote the recycling of construction materials. The toxicity of materials is largely a matter for the Building Control system rather than planning policy, but is addressed in the Council's Climate Change,

		Sustainable Design, Construction and Energy SPD.
	Adequate facilities for waste disposal and recycling must be provided to suit that particular building.	The Council's Climate Change, Sustainable Design, Construction and Energy SPD provides guidance on the provision of space for recycling storage. Policy D2 requires measures that support sustainable lifestyles, which include recycling storage.
	The policy is not compatible with the level of growth in the Local Plan: Strategy and Sites.	The LPSS was found sound by an independent planning inspector. One of the tests of soundness is whether it is sustainable. Sustainability comprises the balancing of environmental, social and economic considerations. The policies in the LPDMP will apply to the growth allocated in the LPSS. National policy requires that plans are reviewed at least every five years. If the LPSS is reviewed and found to require updating then a new plan would need to be prepared in light of the requirements of national policy and guidance.
	<p>The population growth imposed by the current local plan relies on moving large numbers of additional people into a region that "is already under severe water stress". It is not clear how meeting future demand, as implied by the current local plan, will be met within the local plan timetable – or whether it is actually feasible.</p> <p>I have no confidence in the vague statements made by water suppliers in response to planning applications.</p>	<p>The Local Plan part 1 policy ID1 requires infrastructure to be available to support new developments when first needed, which would include provision of water infrastructure.</p> <p>Water Resource Plans produced by the water providers plan a range of</p>

		measures to address any identified deficits.
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Policy D14: Climate Change Mitigation		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey County Council		
	<p>Surrey's Climate Change Strategy: Surrey's Greener Future was approved by the county council in May 2020. It is suggested that this document, which reflects the shared ambition of Surrey's 12 local authorities and has benefitted from the input of Guildford Borough Council, might be usefully referred to in the proposed submission version of the DPD or alternatively within the Climate Change SPD. The consultation on the SPD preceded the finalisation of the Climate Change Strategy document. A link to this document can be found here: https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy</p>	A reference to the strategy has been included in the supporting text.
Natural England		
	<p>Natural England recently published a 2nd edition of its Climate Change Adaptation Manual which includes a Landscape Scale Climate Change Assessment Tool. This tool can be used to identify natural assets (e.g. different habitats and species) in the borough and identify adaptation responses that can be incorporated into a plan to create a resilient landscape across the borough.</p>	Comment addressed in Biodiversity section
	<p>Consideration could also be given to whether the plan recognises the role of ecosystems and soils in carbon sequestration. A strategic assessment of natural assets and Green Infrastructure across the borough can be useful in planning for increasing borough resilience to climate change.</p>	Comment addressed in Biodiversity section
Surrey Nature Partnership		

	<p>The preferred option is understood, but the intention to at least adopt this or a higher standard (i.e. to align with GBC's ambitions to address their 'climate emergency'), could be given further emphasis.</p>	<p>Subject to viability testing</p> <p>The new policy adopts a higher standard of a 31% carbon reduction for new buildings. This ensures the plan is consistent with the government's proposed new standards for dwellings, and is slightly higher than the proposed new standard for commercial buildings.</p>
<p>Environment Agency</p>		
	<p>The document does not mention how water efficiency will be managed. We would expect to see reference to the water company's Water Resource Management Plan. This will help the plan to meet objectives 1 and 7.</p>	<p>A reference to Water Resource Management Plans for the relevant water companies has been added to the supporting text for Policy D12.</p>
<p>Other organisations</p>		
<p>Woodland Trust</p>		
	<p>Need a more ambitious and strategic approach to deploying natural solutions in urgent response to the climate crisis. A rapid increase in the rate of woodland creation has been proposed by the UK's Committee on Climate Change, to provide a key mechanism to lock up carbon in trees and soils.</p> <p>We stress the central importance of natural solutions, particularly increasing tree canopy cover, in sequestering carbon and in providing resilience against the effects of climate change, providing an alternative to fossil fuel energy and resource-hungry building material, and stemming the declines in biodiversity.</p> <p>We would therefore like to see the council identify areas for new green space and woodland creation to help mitigate the effects of climate change and also to help semi-natural habitats and species adapt in response to climate change. Further guidance is available in the Trust publication, Emergency Tree Plan for the UK (2020).</p>	<p>Noted. The strategic approach deploying natural solutions is best be addressed through biodiversity policy.</p> <p>The benefits of woodland are noted and agreed.</p> <p>Regarding flooding, the SuDS policy notes the benefits of planting to slow down flood water and supports Natural Flood Management.</p> <p>New policy requires schemes to combat the urban heat island effect through incorporation of green and blue infrastructure. This would include the provision of urban trees, which is explained in the supporting text. The use of tree shading to prevent buildings overheating is set out in the Climate Change, Sustainable Design, Construction and Energy SPD.</p> <p>The plan includes Open Space policies which safeguard green areas and require developments to provide more.</p> <p>Tree planting does not require planning permission (unless it constitutes a change of use) so allocating land</p>

		for such through the local plan would serve no purpose. However, the biodiversity policies in this plan set out the need for new developments to plant the most beneficial species onsite, including native trees.
Burpham Community Association		
	Disagree. Having recognised and declared a climate change emergency, this is one of the biggest opportunities to make a difference. The council must insist on carbon neutrality, unless this is illegal, in which case a 30% improvement is the minimum to consider.	A policy requiring developments to be zero carbon would not be illegal but would be subject to a number of stringent tests through the Local Plan Examination process, including demonstrating that the policy is viable. Such a standard would impact on the delivery of other benefits, such as affordable housing. Subject to viability testing The proposed policy will improve carbon reduction standards to 31% above the baseline.
Parish Councils		
	Agree: Effingham, East Clandon, Shalford, East Horsley, Ash, West Horsley	Noted
Surrey Wildlife Trust		
	The preferred option is understood, but the intention to at least adopt this or a higher standard (i.e. to align with GBC's ambitions to address their 'climate emergency'), could be given further emphasis.	Subject to viability testing The revised policy adopts a higher standard of a 31% carbon reduction for new buildings. This ensures the plan is consistent with the government's proposed new standards for dwellings, and is slightly higher than the proposed new standard for commercial buildings.
Guildford Society		
	Disagree. We need a policy now. Surely a policy can be crafted to propose a 20 per cent reduction or use a central government standard if one is promulgated, using whichever is the higher.	The Council has already implemented a 20 per cent carbon reduction through policy D2 of the LPSS. Subject to viability testing

		The revised policy adopts a higher standard of a 31% carbon reduction for new buildings. This ensures the plan is consistent with the government's proposed new standards for dwellings, and is slightly higher than the proposed new standard for commercial buildings.
Compton Parish Council		
	Disagree: need an interim climate-change mitigation policy, which could be updated in the light of possible amendment to the Planning and Energy Act 2008, that introduces a more stringent carbon-reduction standard that is subject to "viability testing" and would give developers the "wriggle room" to simply say that meeting the new standard is not viable.	Subject to viability testing The revised policy adopts a higher standard of a 31% carbon reduction for new buildings. This ensures the plan is consistent with the government's proposed new standards for dwellings, and is slightly higher than the proposed new standard for commercial buildings.
East Clandon Parish Council		
	Has this policy been bench-marked against other Councils policies known to be exemplary in the Climate Change approach?	Officers and members are aware of the policies and work being undertaken in other local authority areas, including those with leading on standards across England. The Council works closely with other Surrey Local Authorities through the Surrey Planning Working Group. The Council is a member of the Association of Public Service Excellence (APSE) and is engaged with the energy which enables communication and collaboration with other councils nationally.
Home Builders' Federation		
	Improvement in building standards should be consistent across the country and allow for a reasonable transition period to ensure the continued delivery of new homes alongside improving standards related to energy efficiency and carbon emissions. Such an approach can only be achieved through building regulations and not through individual local plans.	Subject to viability testing The revised policy adopts a higher standard of a 31% carbon reduction for new buildings. This ensures the plan is consistent with the government's proposed new standards for dwellings, and is slightly higher than the proposed new standard for commercial buildings.

		The point about consistency is noted and we agree it would be preferable to have a level playing field. However, in the event that government does not take forward the proposed improvements to carbon standards as set out in the Future Homes and Future Buildings consultation material, our view is that the climate emergency warrants local standards. The government agrees that local authorities can and should implement such standards as it has signalled that it will not amend the Planning and Energy Act 2008 to remove the power to do so.
Worplesdon Parish Council		
	No policy is proposed until the outcome of the Future Homes Consultation. A policy would then need to be consulted upon.	The draft plan will be subject to a minimum six week consultation under regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012.
Martin Grant Homes		
	We agree that there will be a need for viability testing of any proposed carbon reduction standard that is more stringent than the current standard set out in Part L of the Building Regulations, given the potential cost impacts of new development. We therefore welcome the decision to consider policy options once the outcome of the Future Homes consultation is known. As yet the timing of this is unknown, however changes were initially expected to come into force during 2020.	Noted. Subject to viability testing The revised policy adopts a higher standard of a 31% carbon reduction for new buildings. This ensures the plan is consistent with the government's proposed new standards for dwellings, and is slightly higher than the proposed new standard for commercial buildings. This decision follows the outcome of the Future Homes consultation and new information regarding Future Buildings.
West Horsley Parish Council		
	Agree. Given how critical this is, has this policy been benched marked against other Councils policies known to be exemplary in the Climate Change approach?	Officers and members are aware of the work being undertaken in other local authority areas, including those leading on standards across England. The Council works

		closely with other Surrey Local Authorities through the Surrey Planning Working Group.
Burpham Neighbourhood Forum		
	The extant requirement for new buildings to achieve a 20 per cent carbon reduction measured against national building regulations standards is probably an unattainable goal in the confines of the current economic situation.	There is no indication that the Council's carbon standard has been rendered unviable due to Covid and our initial viability study for the 20% reduction indicated the cost impacts were low. New developments have been achieving the standard throughout the pandemic.
Other respondents		
	<p>Disagree. The standards that were proposed by the Government in the Future Homes consultation do not go anywhere near far enough: the proposed changes would only be required from 2025, and claim to contribute to the Government's net zero by 2050 target (though experts at the London Energy Transformation Initiative and elsewhere argue they will not even meet that target). This is in contrast to GBC's own target of net zero by 2030 for the borough of Guildford. Therefore, unless there is a very radical and very swift change from the Government – which is unlikely – we cannot afford to rely on the results of the Future Homes Standard consultation. GBC's SPD on Climate Change, Sustainable Design, Construction and Energy is strong, and it would therefore be expected that the Development Management Policy option here would reflect a strong commitment to becoming carbon neutral by 2030.</p> <p>The notes do not say when the outcome of the Future Homes Standard consultation will be published or indicate when the standard will be implemented. Surely it would be better to start work on a standard before then in the hope that it can be implemented along with the other LDMPs ahead of general implementation.</p>	<p>The results of the Future Homes consultation have now been published. The Future Homes standard is proposed to begin in full in 2025, but there will be an interim uplift in standards (including carbon emission standards) later in 2021, which will take effect from mid-2022.</p> <p>Subject to viability testing</p> <p>The revised policy adopts a higher standard of a 31% carbon reduction for new buildings. This ensures the plan is consistent with the government's proposed new 2022 standards for dwellings, and is slightly higher than the proposed new standard for commercial buildings. This ensures that the standard is not subject to a government delay or U-turn.</p>
	Disagree. It is not sufficient to consider climate change mitigation in terms solely of energy efficiency and embodied emissions.	Agree that climate change is a cross-cutting issue. The planning system deals with matters of development and land use. Adopted and proposed planning policies

		<p>address climate change through the location of development in sustainable locations, the need to reduce travel, low energy development, climate change adaptation in new development, embodied emissions in the construction process and provision of low carbon energy. Other elements of climate change mitigation may fall outside the scope of the planning system.</p>
	<p>Absolutely everything must be done to mitigate climate change. All new buildings should not have gas run to the house. Cooking will therefore be all electric. Maximum opportunity for use of ground source or air source heat pump should be used to reduce the amount of electricity required for heating.</p>	<p>The Future Homes standard proposes to ban the use of gas in new homes in 2025 largely to be replaced by heat pumps. The government's view is that the supply chain for heat pumps is not yet developed enough for the ban to come earlier. A ban at this stage would result in direct electric heating, which is expensive for occupants. The government is proposing to introduce measures which will bring down the cost of electricity but we do not yet know when these will take effect.</p> <p>The current policy (20% carbon reduction) has seen a number of developments proposed that are heated by heat pumps, though these are mainly limited to apartment blocks.</p> <p>The replacement policy sets out requirements for low carbon heat networks, which will likely deliver building level heating systems fed by heat pumps.</p> <p>Subject to viability testing</p> <p>The revised policy adopts a higher standard of a 31% carbon reduction for new buildings. This ensures the plan is consistent with the government's proposed new 2022 standards for dwellings, and is slightly higher than the proposed new standard for commercial buildings.</p> <p>This higher standard will further support the use of heat pumps.</p>

	<p>Is there a policy that supports or requires solar energy on roof space (for new developments and fitting to existing buildings)? The use of existing and future roof space for solar energy should be encouraged. The design of roofs and building layout should take this into account. Using roof space in this way delivers energy direct to the point of use.</p>	<p>It is not reasonable to mandate specific technologies. However, the current policy (20% carbon reduction) has been frequently met through the use of rooftop solar.</p> <p>Subject to viability testing</p> <p>The revised policy adopts a higher standard of a 31% carbon reduction for new buildings. This ensures the plan is consistent with the government's proposed new 2022 standards for dwellings, and is slightly higher than the proposed new standard for commercial buildings.</p> <p>This would likely increase the use of rooftop solar.</p>
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Policy D15 Large scale renewable developments		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey County Council		
	Surrey's Climate Change Strategy: Surrey's Greener Future was approved by the county council in May 2020. It is suggested that this document, which reflects the shared ambition of Surrey's 12 local authorities and has benefitted from the input of Guildford Borough Council, might be usefully referred to in the proposed submission version of the DPD or alternatively within the Climate Change SPD. The consultation on the SPD preceded the finalisation of the Climate Change Strategy document. A link to this document can be found here: https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy	A reference to the strategy has been added to the supporting text.
Surrey Nature Partnership		
	Supported.	Noted
Waverley Borough Council		
	The policy states that the preferred option is to 'To allocate one or more sites for renewable and low carbon energy development in appropriate locations where visual and other impacts will be minimised and where energy potential is good.' The document does not give any indication on where these allocations may be, but depending on the proximity to the Waverley boundary there could be a potential cross-boundary impact. In light of this, we will need further information about the site allocations in the future before we can make a comment on this approach and would welcome early joint discussions on any sites being considered for allocation which could have cross-boundary impacts.	It is agreed that renewable energy developments can have cross boundary impacts. Following exploratory work, the Council has decided to pursue the alternative policy option; a general policy governing renewable energy developments. As a result, the plan does not allocate land for renewable energy development.

	Waverley values joint co-operation with its adjoining boroughs and districts and looks forward to further working with Guildford Borough Council as the Guildford Local Plan: Development Management Policies progresses.	
Other organisations		
Guildford Residents' Association		
	Prefer the alternative option - to not allocate land for such developments but to have a general policy with criteria that prevent negative impacts.	Noted. The Council agrees and has implemented the alternative option. The policy contains criteria specific to renewable energy developments and sets out guidance on how harm should be minimised. Heritage, landscape, Green Belt and other matters are covered by local and national policies that cover those matters.
Guildford Society		
	The Policy is vague. It might be better expressed in another Council document. Careful cost benefit analysis is essential before any commitment is made. It should not be assumed that development within the Borough is better than use of the National Grid to connect to facilities elsewhere. Electricity transmission is comparatively cheap.	The preferred option has not been taken forward. The second paragraph of this comment refers to the possibility of the Council bringing forward a renewable energy project as a developer. This is not a matter for the Local Plan. Regarding the third paragraph, the NPPF requires the Council to support delivery of renewable energy development. Additionally, the Council has declared a climate emergency and aims for the borough to achieve net zero emissions by 2030. The national grid will not be fully decarbonised by 2030 so it is necessary to consider local generation of zero carbon energy.
Compton Parish Council		
	Compton PC could only support this Policy under the proviso that any land selected for large-scale renewable and low-carbon energy would have zero impact on Areas of Outstanding Natural Beauty (including their settings),	The proposed policy does not allocate land for renewable energy development but sets the conditions for new renewable developments. The Local Plan (incorporating parts 1 and 2) will be read as a whole

	Areas of Great Landscape Value and on the openness of the green belt. This should be incorporated within the policy.	and includes protections for the AONB, AGLV and Green Belt.
Merrow Residents' Association		
	Agree with the preferred option. However, it is not clear how sites would be evaluated. We are opposed to the allocation of one or more sites for renewable and low carbon energy development anywhere within the Green Belt. To allow such visually intrusive developments such as solar farms or wind farms would defeat the 'openness' objective of the Green Belt	The preferred option has not been taken forward and the plan is not allocating land for renewable energy development.
	The renewable and low carbon energy sources considered seem to focus on wind and solar. Research shows that deep geothermal sources are only viable in parts of South West England and parts of Wessex and Cheshire. We question whether ground sourced heat pump central plant systems have been evaluated for developments in the borough? (it is noted of course that these may not be considered large scale in the context of this policy.)	Heat networks driven by ground source heat pumps are covered by Local Plan: Strategy and Sites policy D2 and the Climate Change, Sustainable Design, Construction and Energy SPD (the policy refers to CHP heat networks but the SPD clarifies that shifts in national policy with regards to low carbon heat mean that this should be read as a reference to all low carbon heat networks). The policy is not limited to wind and solar and would include geothermal facilities. It would not be possible to mandate the use of such technologies.
	In land allocated for future low carbon developments, the same criteria should be written in the 'Preferred Option for large scale renewable and low carbon energy' box as for that written in the 'Alternative options for large scale renewable and low carbon energy' box, i.e. criteria that prevents negative impacts on landscape, heritage, Green Belt, etc."	The preferred option has not been taken forward. The policy does not allocate land for development and includes criteria governing renewable energy developments.
Blackwell Park		
	We are interested to see the results of such a study and what sites might be identified, and for what types of low carbon/renewable energy, noting that much of the borough is covered by green belt policy that places a restriction on inappropriate development (of which large scale renewable or low carbon energy development might be an example). One question is	Following exploratory work, the Council has decided to pursue the alternative policy option; a general policy governing renewable energy developments. As a result, the plan does not allocate land for renewable energy development.

	whether it is likely that the study might lead to proposals to alter green belt boundaries through the local plan to accommodate suitable large-scale renewable or low carbon energy sites? The climate emergency might be deemed an exceptional circumstance to allow this.	
Portland Capital		
	The alternative option for criteria-based policy is more appropriate and wide reaching in securing renewable and low carbon energy development across the borough. Any site allocation involving more onerous requirements relative to low carbon development could have serious implications for viability and deliverability of development in the borough. If GBC seek to retain this policy, more detail needs to be provided with regards to standards required in appropriate locations and discussed thoroughly with relevant landowners prior to allocation.	The alternative option has been taken forward.
Gatwick Airport		
	The Guildford Borough Council area is within our 30km wind turbine consultation zone. Wind turbines within 30km of ARP have the potential to impact on radar utilised by the airport.	Gatwick Airport will be consulted on any proposals for wind turbines through the planning applications process. This information has been added to the supporting text of the new policy.
NATS [air traffic control]		
	NATS En Route LTD has no comments to make on the Local Plan. In terms of renewable energy however, specifically wind turbine applications (of any size or location), as these can impact its infrastructure and operations, it encourages prospective applicants to engage early. Advice on wind turbine applications and the impact on aviation can be sought by contacting NATS Safeguarding, natssafeguarding@nats.co.uk or http://www.nats.aero/windfarms	NATS will be consulted on any proposals for wind turbines through the planning applications process. This information has been added to the supporting text of the new policy.
Residents for Guildford and Villages / Guildford Green Belt Group		
	Agree, with reservation. Paragraph 152 of the NPPF states "Local planning authorities should support community-led initiatives for renewable and low	The LPSS at para 4.5.32 states "The Council supports delivery of decentralised energy schemes with an

	<p>carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.”</p> <p>There is no reference in the DMP to how community led initiatives for renewable or low carbon energy would be supported or applications for such projects be determined. It is therefore recommended that the scope and wording of policy D15 is expanded to ensure that these requirements of the framework can be captured within any policy wording.</p>	<p>aspiration that these should have some degree of community benefit and/or community ownership where this is possible.”</p> <p>Preferred option D15 proposed support for all proposals for renewable and low carbon energy development, including community-led initiatives. The policy has been amended to include “strong support” for community-led initiatives.</p>
West Horsley Parish Council		
	<p>The process for assessment of these areas needs to be determined, and an indication of where these areas are likely to be located. The focus should be on Brownfield land rather than Green Belt. The likely impact on biodiversity is a significant concern.</p>	<p>The alternative option that has been taken forward includes criteria that will be used in the assessment of proposals for renewable and low carbon energy development. Additionally, the plan includes policy covering heritage, Green Belt, landscape and other matters which will apply.</p> <p>The point about biodiversity is acknowledged. A key issue for solar farms is management of the site, and has been addressed in the policy. Biodiversity is protected more broadly through biodiversity policies in the plan.</p>
Ockham Parish Council		
	<p>Whilst we support the principles of renewable and low carbon energy, the selection of specific sites for renewable and low carbon energy development could be subjective and we do not support it.</p>	<p>The option of allocating sites for renewable and low carbon energy has not been taken forward.</p>
Other respondents		
	<p>Solar farms are not suitable in hilly areas, such as the Surrey Hills AONB where the panels acting as mirrors glisten in the sun and harm views over a very wide area, causing eyesores in the countryside.</p>	<p>The plan includes policies that protect landscape, the AONB and important views.</p>

	<p>Renewable energy developments that feed into the national grid can be located anywhere in the country. As a result, the most efficient sites (e.g. where wind is stable) and sites that would cause the least harm to the environment should be selected at the national scale and it should not be assumed that Guildford needs to provide such sites. Green Belt and AONB may mean that Guildford is not a suitable location.</p>	<p>The NPPF requires the Council to support delivery of renewable energy development and to consider identifying areas suitable for low carbon energy and associated infrastructure. The Local Plan cannot identify sites outside of the local authority boundary or set national policy for identifying sites.</p>
	<p>Prefer the alternative option (a general policy supporting renewable developments), as long as the policy includes strict criteria that protects views, as well as heritage and Green Belt etc.</p>	<p>The alternative option has been taken forward. It includes criteria specific to renewable energy developments. The plan contains other policies that cover views, heritage, Green Belt and other matters.</p>
	<p>The Preferred Option lessens, but does not prevent the possibility of a development occurring on unallocated land.</p>	<p>The preferred option has not been taken forward. The proposed policy supports low carbon energy developments on unallocated land and will be read alongside other policies that protect landscape, views, heritage etc.</p>
	<p>Is there a policy that supports or requires solar energy on roof space (for new developments and fitting to existing buildings)? The use of existing and future roof space for solar energy should be encouraged. The design of roofs and building layout should take this into account. Using roof space in this way delivers energy direct to the point of use.</p> <p>There is a policy about Large Scale Renewable and Low Carbon Energy. Another policy is needed to encourage smaller scale schemes on strategic and significant sized sites if, for example, there is a sufficiently powerful stream flowing through it.</p>	<p>Policy D2 of the LPSS requires new buildings to achieve a carbon reduction rate that is 20% lower than the national standard through improved energy efficiency and low carbon energy. In practice, this policy has driven the implementation of solar panels on new developments. It would not be possible or desirable to mandate the use of solar panels on all rooves they will not be the most effective option in all circumstances. Additionally, the policy supports a 'fabric first' approach which prioritises efficiency over low carbon energy. Mandating solar panels would compromise this approach.</p>
	<p>Concerns about allowing renewable developments on open space due to:</p> <ul style="list-style-type: none"> • Impacts on existing biodiversity. • Loss of carbon sequestration potential 	<p>The plan contains policies that protect biodiversity and the proposed policy includes specific criteria for solar farms to prevent practices harmful to biodiversity.</p> <p>The loss of carbon sequestration potential and biodiversity gain potential cannot be taken into</p>

	<ul style="list-style-type: none"> • Loss of biodiversity gain potential (the Environment Bill will introduce new demands for land for biodiversity). • Impact on views into and out of AONB, AGLV and other countryside land <p>The maximum area that can be shaded by the panels should be specified taking advice from national wildlife conservation organisations that act independently of the industry.</p>	<p>account in planning decisions as unless there is clear evidence of the potential and a strong likelihood it will be achieve the benefits fare hypothetical.</p>
	<p>As well as allocating land, the preferred option (a general policy supporting renewable energy developments) should also be included.</p>	<p>Following exploratory work, the Council has decided to pursue the alternative policy option; a general policy governing renewable energy developments. As a result, the plan does not allocate land for renewable energy development. Instead, a general policy supporting renewable energy developments has been included.</p>
	<p>Opposed to the allocation of one or more sites for renewable and low carbon energy development anywhere within the green belt. To allow such visually intrusive developments such as solar farms or wind farms would defeat the whole purpose of the green belt. There are other far more appropriate locations for such installations.</p>	<p>The preferred option to allocate land for low carbon energy has not been taken forward.</p>

Parish Councils		
	Agree: East Clandon, Effingham, Shalford, East Horsley, Ash	
Other		
	Agree provided that monitoring is in place	[Not sure what this means]
	Expect the Council to be very careful in selecting responsible developers and partners going forward.	If the Council decides to bring forward a low carbon energy scheme as a developer, the governance of the project would not be controlled by planning policy and is not a matter for the Local Plan.
	The policy is only needed in order to mitigate harmful Local Plan growth.	The NPPF requires the Council to support delivery of renewable energy development. This policy has effect regardless of the level of growth proposed in the Local Plan.
5.132	<p>Paragraph 5.132 quotes NPPF 147: “When located in the Green Belt elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefit associated with increased production of energy from renewable sources.”</p> <p>The last sentence should be omitted from DMP 2020 even though it quotes the NPPF as it prejudices ‘very special circumstances’.</p>	This text was included in the issues and options document to provide background. It has not been included in the proposed submission plan.
5.134	If the preferred option is chosen (to allocate land for renewable development) this should apply strict criteria to ensure the correct site is chosen. This should include consideration on impacts on views. In 5.134 the words ‘and least damaging’ should be inserted in the last sentence as follows: “.....a study that identifies the most suitable, technically feasible and least damaging locations.”	The preferred option has not been chosen. Paragraph 5.134 contains explanatory text for the issues and options document which is not

		included in the proposed submission plan.
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Policy D16 Designated Heritage Assets		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey County Council		
	Reference to the consideration and management of views might be worthy of inclusion either within the Historic Environment Section or the Natural Environment Policies. As the borough council has produced SPD on Town Centre Views, mention of this topic within these policies for the wider Borough had been anticipated.	Amendments have been made throughout all of the Historic Environment policies (D16-D20) to provide reinforced reference to views. This includes providing reference to the Town Centre Views SPD within this policy as well as emerging policies, Policy D11: The River Wey and Godalming Navigation and Policy D17: Listed Buildings.
Enabling Development (3)	It could be made clearer in the section relating to enabling development that additional consents will be required from Historic England, should enabling development affect designated assets, and that this consent may not be forthcoming, even if the council's own view is that it fulfils the criteria set out for support here.	Historic England (HE) are only consulted in certain circumstances, irrespective of whether the scheme is for enabling development or not, the most pertinent being: <ul style="list-style-type: none"> • Development which affects Grade I and II* listed buildings or their setting, a grade I and II* registered park or garden, or a scheduled monument • Development which affects the character or appearance of a Conservation Area where the area of land in respect of which the application is made is greater than 1000 square metres

		Out of the above, only Schedule Monument cases will require a parallel consent (Schedule Monument Consent) from HE. This is to be clarified in the policy's supporting text.
Historic England		
	Note that Historic England has recently (30 June 2020) published updated guidance on enabling development in Good Practice Advice Note 4: Enabling Development and Heritage Assets.	<p>The preferred option had been to refer to Historic England's policy strategy that had been set out in the pre-June 2020 guidance, as this had provided a concise and robust criteria in which to assess enabling development against.</p> <p>However, as this strategy has now been omitted from the updated guidance (a consequence of the introduction of an Enabling Development policy (para 202) within the NPPF) the decision has been taken to remove Enabling Development from this policy and to give it its own separate policy. This policy sets out the key tests making it very clear what is expected from the outset. Those key tests and requirements are:</p> <ul style="list-style-type: none"> • That it is the minimum necessary required to address the conservation deficit; • That it is necessary to solve the conservation needs of the asset and not the financial needs of the scheme; <ul style="list-style-type: none"> • A market testing exercise has been undertaken and this evidences that there are no alternative means of delivering the same outcome for the heritage asset; • That it has been accompanied by a conservation management plan
Other organisations		
Bridge End Farm, Ockham		
	Consider that this policy should be consolidated into a single policy with D17, D18, & D19	Disagree - Whilst such a suggestion of consolidating this policy into a single policy with the emerging proposed policies D17, D18 & D19 is perfectly valid and feasible, particularly as it is in line with the single approach taken by

		the NPPF there is a concern that it would result in a very lengthy policy which is not user friendly.
	Imposes an unacceptable and unnecessary level of detail within the policy such that there is a genuine danger that it oversteps the requirements as set out in the NPPF and could indeed frustrate development unintentionally. We consider the Local Plan Policy D3 provides a sufficient framework for the assessment of development on heritage assets and their setting	Disagree - Policy D3 is an overarching heritage policy that sets out the boroughs aims to conserve heritage assets. However, the quality, variety and the extent of the historic environment within the Guildford district requires a more comprehensive and robust policy framework that expands on the core policy as well as the national planning policy framework.
Guildford Residents' Association		
Supporting Information (1)	Proposes that 'Expects' should be changed to 'Requires'	Agreed. The para 189 of the NPPF requires an applicant to describe the significance of any heritage assets affected. This has been amended accordingly in the policy.
Martin Grant Homes		
Enabling Development (3)	Should be a separate stand-alone policy - should apply to any heritage asset, designated or non-designated to secure its long-term preservation	Agreed - A decision has been taken to separate Enabling Development from this policy and to make it a stand-alone policy. This is emerging as Policy D20: Enabling Development.
Guildford Society		
Supporting Information (1)	Policy should state that if a Statement of Significance is not provided, the proposal will not be approved.	The policy has been amended to make it explicit that if adequate or accurate detailed information is not submitted, the application will be refused.
	The LPDMP should include Table 1 together with links to where lists and details of heritage assets can be found.	This information together with reference links to the Policies Map and the Historic Environment Record has been provided in the policy's supporting text.

Taylor Wimpey		
Supporting Information (1f)	Question whether it is appropriate for the Heritage Statement to include a list of the public benefits, this would normally be compiled in the Planning Statement.	Agreed - The policy no longer includes the requirement for applicants to identify public benefit. However, public benefit has been discussed in the supporting text.
Residents for Guildford and Villages / Guildford Green Belt Group		
	Concerned with the lack of evidence base and supporting documentation surrounding conservation areas and heritage assets in general meaning that GBC is reliant on applicants to provide evidence with applications with no evidence base against which to assess them	<p>Disagree on both counts. Ultimately para 189 of the NPPF places the requirement on the applicant to describe the significance of any heritage asset, when making an application, whilst the Local Planning Authorities obligation is to either maintain or have access to an up-to-date historic environment record, which is set out in para 187 of the NPPF, and to identify and assess the particular significance of any heritage asset that may be affected by a proposal, as set out in para 190 of the NPPF.</p> <p>The Council has a comprehensive evidence base which can be publicly accessed via the Authority's online interactive map and is updated accordingly when changes are issued. It includes:</p> <ul style="list-style-type: none"> Listed Buildings; Conservation Areas; Schedule Monuments; Historic Parks & Gardens Locally Listed Buildings; Article 4 Directions; County Sites of Archaeological Importance Areas of High Archaeological Potential Landscape Character Assessment

		<p>Supplement to that, the Authority has published a Historic Environment Information (2016) document as part of its evidence base which is a collection of all the above information along with other relevant sources on matters such as:</p> <ul style="list-style-type: none"> Locally designated Historic Parks and Gardens Heritage at Risk Residential Character - Residential Design Guide SPG War Memorials <p>This document has also set out the Authority's intention when it comes the appraising of Conservation Areas during the duration of the Local Plan period, and those that have been appraised in accordance with the latest guidance are able to be viewed publicly through the Council's website</p> <p>In addition to all of the above, the Council and the general public also has access to the Historic Environment Record provided and maintained by Surrey County Council.</p>
<p>Loss of Significance (2)</p>	<p>Wording on 'loss of significance' in this policy needs to be further expanded. Paragraph 194 of the NPPF is clear that proposals which result in substantial harm to or loss of a designated heritage asset should be exceptional and should be refused unless there are substantial public benefits which are set out in detail. Even 'less than significant harm' as set out in paragraph 196 is to be weighed against public benefits</p>	<p>The policy directs that harm to significance will be considered in line with national policy and guidance. However, the policy's supporting text does provide much greater detail, guidance and clarity on the methods of this.</p>
	<p>Wording of policy D16 should be expanded to demonstrate that GBC will enforce the strict measures around development impacting on heritage assets against the clear requirements of the NPPF.</p>	<p>The policy directs that harm to significance will be considered in line with national policy and guidance. However, the policy's supporting text does provide much greater detail, guidance and clarity on the methods of this.</p>

West Horsley Parish Council		
	More emphasis should be put on the setting, including the immediate area outside the curtilage	<p>This policy instructs that the supporting information:</p> <ul style="list-style-type: none"> • must demonstrate a clear understanding of the contribution made by setting to a heritage assets significance; and • explain how the asset and its setting will be affected by a proposal <p>However, supplement to this are a suite of other emerging heritage policies all of which contain asset specific policy relating to setting.</p>
Loss of Significance (2)	Suggest that whilst the Council is looking to rely on the relevant paragraphs in the NPPF for assessing harm that this is included in any subsequent policy to enable the requirements to be clearly articulated at a local level.	To address this provision has been made within the supporting text to the policy provides additional guidance and clarity on the assessment of harm.
National Trust		
Loss of Significance (2)	Careful consideration needs to be given as the policy develops is around the "Heritage at Risk" and the suggestion that a different level of public benefit may be applied. The Trust accepts that these assets need the positive strategy required in the NPPF but consider that clear criteria will need to be identified as to what "special consideration" will be given and how this will be assessed against the significance of the asset.	It is difficult to develop a clear criterion that would cover all eventualities. Therefore, the approach taken is to amend the policy in a more general way that is more manageable. The policy as amended now seeks, where appropriate, positive action for those heritage assets at risk.
Burpham Neighbourhood Forum		
Footnote to Table 1	There should be a direction to these listed buildings within this table and buildings and structures in the curtilage should be included within the reference listings.	It is difficult for the Local Authority to provide what its being asked here as the act of statutorily listing (and de-listing)

		<p>buildings and structures is undertaken by the Secretary of State by proxy of Historic England.</p> <p>Historically curtilage structures were never identified on the statutory list, the listing was simply identified by its address, although some more recent or updated listings have started to include a plan which identify the listed building itself along with its curtilage and any structures associated with it. In either case, unless the list entry explicitly says otherwise, the law (section 1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990) cites that the listed building also includes any ancillary object or structure within the curtilage of the building, which forms part of the land and has done so since before 1st July 1948. Therefore, this footnote is purely serving a precautionary function given the inconsistencies between the older listings and the more updated or newer listings and the overarching legislation.</p>
Other respondents		
Supporting Information (1)	'Expects' is not strong enough	Agreed – This is to be amended to 'must be supported'
	The policy needs to be clear that if an application would be detrimental to the listed building / heritage asset, it should be refused, rather than allowing these considerations to compromise other policies.	The policy directs that harm to significance will be considered in line with national policy and guidance. However, the policy's supporting text does provide much greater detail, guidance and clarity on the methods of this.
Supporting Information (1)	The new Policy should state that if an expected Statement is not provided, the proposal will not be approved.	The policy has been amended to make it explicit that if adequate or accurate detailed information is not submitted, the application will be refused.
	Compulsory that the developer includes CGI imagery alongside any planning application connected or neighbouring a heritage site	Whilst the use of CGI imagery is helpful in some instances, it is unreasonable to expect its compulsory use in every application. Para 189 of the NPPF is clear that the level of detail provided should be proportionate to the assets'

		<p>importance and no more than is sufficient to understand the potential impact of the proposal upon significance.</p> <p>However, Emerging Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness does address the use of this this type of technology in applications, noting that it is useful means of assessing the likely impact of development on the townscape/landscape setting or nearby heritage asset.</p>
	<p>Preservation of Historical Buildings is important, but development of the site must include surrounding residents if said development impacts them</p>	<p>The topic of impact on neighbouring amenity is a consideration of emerging Policy D5. Nevertheless, this policy instructs that the supporting information:</p> <ul style="list-style-type: none"> • must demonstrate a clear understanding of the contribution made by setting to a heritage assets significance; and • explain how the asset and its setting will be affected by a proposal <p>However, supplement to this is a suite of other emerging heritage policies all of which contain asset specific policy relating to setting.</p>

Policy D17 Listed Buildings		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		
	Agree	Noted
Surrey County Council		
Policy Para 1d)	Could reference the architectural integrity as opposed to just architectural features	Policy now makes reference to architectural and historic integrity.
Policy Para 1d)	Might be considered insufficient	This subsection of the policy has been amended in order to address the comments made. The subsection of the policy now expects regard to be given to the historic internal layout as well as the architectural and historic integrity the forms part of the special interest of the building.
Other organisations		
Martin Grant Homes		
Policy Para 1c) & 1f)	Concern that policy is overly prescriptive – particularly where it states “retain historic plan form” and “not harm the special interest and significance” Thus, it’s the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed	Para 45 of Historic England’s technical advice note 2 – Making Changes to Heritage Assets cites that the plan form of a building is frequently one of its most important characteristics and that proposals to remove or modify internal arrangements...will be subject to the same consideration of impact on significance as for external visible alterations. It is accepted that in some instance the plan form may need to be sacrifice or altered, subject to strong justification and evidence. Therefore, the wording of this section of the policy

		<p>has been altered, with 'retain' being exchanged for 'have regard to'.</p> <p>With regards to point made about the use of 'not harm the special interest and significance', this was in relation to curtilage listed structure and their preservation. It has been accepted that the way this had been written was unreasonable and has been omit.</p> <p>However, curtilage structures are an important consideration and therefore the policy now sets a criteria in which to consider their demolition/removal.</p>
Policy Para 1g)	'Parks, garden or yard' – not appropriate. If intention is setting, then it needs to be worded as such	Agreed – This aspect of the policy has been removed, and more emphasis has been given to setting throughout the policy.
	Propose that Policies D17, D18 and D19 could be combined into one overarching 'Designated Heritage Assets Policy' as the principles set out in the NPPF are the same regardless of the type of asset.	Whilst such a suggestion of consolidating this policy into a single policy with the proposed policies D17, D18 & D19 is perfectly valid and feasible, particularly as it is in line with the single approach taken by the NPPF there is a concern that it would result in a very lengthy policy which is not user friendly.
Taylor Wimpey		
	<p>Given the content of Policy D16, this policy does not seem necessary. Approach outlined in this policy is largely set out in a variety of guidance documents and policy positions. Listed Buildings are also covered by a well-established legal framework further reducing the need for a Local policy</p> <p>Makes the following suggestion to add to Policy D16 <i>"Development proposals are required to consider alterations, additions or other works, directly, indirectly or cumulatively"</i></p>	<p>Whilst it is agreed that the approach outlined in this policy is set out in a variety of guidance documents, the act of bringing the most pertinent of them, in terms of the context of Guildford, conveniently together in to one place, is considered to be important. Not only in terms of user convenience but more crucially, because it amplifies its status – In the case of Historic England guidance's many note that while they <i>"support the implementation of national policy it does not constitute a statement of Government policy itself"</i></p>

	<i>affecting the special interest of a statutory listed or curtilage listed building and their settings”.</i>	Additionally, it has been designed to provide some additional clarity for users.
Guildford Residents’ Association		
	Keen to see a stronger commitment to protecting listed buildings from demolition and to protecting the setting of listed buildings, as provided for by the 2003 Plan policies HE3 and HE4.	With regards to the comments made concerning demolition, the policy has been amended to make it explicitly clear that where harm to significance is identified, that this will be considered against the emerging policy D16: Designated Heritage Assets, which covers the Councils approach to the assessment of harm. And this policy’s supporting text provides some additional clarity and guidance. Regarding the protection of setting, this has been significantly strengthened by a number of amendments to the policy which reinforces the matter of setting. The most notable being an approach to demolition/removal of curtilage objects and structures.
Guildford Society		
	Omits the prohibition of illumination (shopfronts) – not covered by proposed policy D7	External Illumination relating to shopfronts is addressed by emerging Policy D7: Advertisement, hanging signs and illumination.
Holy Trinity Amenity Group		
	Policy needed to reassess buildings that might gain statutory listing	This is beyond the scope of the policy - The act of statutorily listing (and de-listing) buildings and structures is undertaken by the Secretary of State by proxy of Historic England.
The National Trust		

Policy Para 3)	Supports an approach that acknowledges and attempts to deal with the complex balance between environmental/sustainability measures and harm to a heritage asset. We would encourage a focus on accommodating building efficiencies, where other potentially intrusive options could cause greater harm to significance.	Agreed – The policy has been amended to strike a balance between climate change mitigation and energy efficiency improvements.
Burpham Neighbourhood Forum		
	Would like to see wording of policy tightened to require heritage assessments for all applications	In the context of Listed Buildings this has been covered by emerging policy D16: Designated Heritage Assets.
Guildford Vision Group		
	Require some flexibility where modern elements and improvements would allow e.g. better/safer accessibility and utility.	The policy as written does not preclude the introduction of modern elements and adaptive improvements, rather it sets out parameters to what is deemed to be acceptable. Where conflicts between a proposal and the conservation of heritage assets does occur, then the NPPF requires the identified harm to significance to be weighed against the public or heritage benefit/s of the proposal. Equally the supporting text is providing additional clarity on this topic.
West Horsley Parish Council		
	Should also reference Neighbourhood Plans and the character area assessments in taking decisions particularly with regards to settings of listed buildings within settlement areas.	Disagree – The plan needs to be read holistically. Emerging policy D4: Achieving High Quality Design and Respecting Local Distinctiveness provides references to Neighbourhood Plans therefore it is considered to not be required in policy here. The same can be said for Conservation Area Character Appraisals, as emerging policy D18: Conservation Areas makes provision for them within the supporting text.
Other respondents		

	<p>The policy needs to be clear that if an application would be detrimental to the listed building / heritage asset, it should be refused, rather than allowing these considerations to compromise other policies.</p>	<p>The proposed policy has been purposefully designed to be positively worded. However, the identified criteria does enable the refusal of applications if the requirements of the policy are not met.</p>
	<p>Listed buildings policy should also consider modern buildings, areas of recent development and other recent installations. It should also be mindful of changing social structures where in a building may have a socially sensitive past (e.g. slavery).</p>	<p>This is beyond the scope of the policy as well as the statutory duty of the Local Planning Authority - The process of statutorily listing (and de-listing) buildings and structures is undertaken by the Secretary of State for Digital, Culture, Media and Sport (DCMS) by proxy of Historic England.</p>

DRAFT

Policy D18 Conservation Areas		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey County Council		
	Pleased to note the reference to “views” in this option, and also the reference to locally-appropriate building materials.	The policy has been amended to address the protection and enhancement of key views and vistas to, from and through a Conservation Area. It also now accommodates specific reference to the use of good quality sustainable building materials appropriate to the locality.
Historic England		
	Scheduled monuments and registered parks and gardens are subject to different legislative regimes and therefore specific policy requirements; a distinct policy for each of these asset types should be considered.	Agreed - These particular heritage asset type have now been given their own distinct policy. D19: Scheduled Monuments and D19a Registered Parks and Gardens.
Other organisations		
Ockham Parish Council		
	Safeguarding of Conservation Areas is integral to aesthetic and heritage principles and any possible development within these areas or surrounding them should not compromise the character or setting of the existing settlement	Noted
Effingham Parish Council		
Policy Para 2	Preamble to policy paragraph 2 is awkward, suggests the following <i>proposals affecting the setting of the Conservation Area, including views from or into the Conservation Area,</i>	Noted – This has been amended and is now more concise.

West Horsley Parish Council		
	Should refer to neighbourhood plans	Disagree – Emerging policy D4: Achieving High Quality Design and Respecting Local Distinctiveness provides references to Neighbourhood Plans therefore it is considered to not be required in policy here.
	Policy should ensure that all Appraisals are included not just those listed.	The supporting text provides a complete list of all Conservation Areas. It also addresses and provides clarity on what steps are to be taken, by both applicants and the Local Planning Authority, in cases where a Conservation Areas does not currently benefit from a Conservation Area Character Appraisal.
	Reference to methods of boundary identification between properties with recommendation that no close boarded fencing is used and only native species planted.	<p>As each conservation area has its own unique character it would be unfair of the policy to categorically prohibit close boarded fencing and state that only native species hedging is planted. For example, closed boarded fencing is likely to be deemed more appropriate in the more suburban conservation areas of the borough.</p> <p>Further still, in areas that are not restricted by an Article 4 Direction, property owners will still be able to undertake works to their boundaries under their permitted development without any limitations to design and material palette of these constructions.</p> <p>Therefore, the emerging policy has been designed to account for the variances in character across each of the conservation areas by focusing on local distinctiveness.</p> <p>Notwithstanding, the above the supporting policy text does provide a reference to the emerging biodiversity policy - Policy P6/P7: Biodiversity in New Developments, in relation to proposed planting and landscape schemes</p>

Reach PLC		
Para 5.178 Para 5.181 Policy Para 1) & 2)	Policy refers multiple times to the statutory requirement to 'preserve and enhance' the character and appearance of conservation areas. The wording should be 'preserve OR enhance' (our bold amend added) as reflected in Section 69 of The 1990 Planning (Listed Buildings and Conservation Areas) Act.	Agreed - The policy has been amended to correct this.
Quod/Portland Capital		
	Emerging policy appears overly restrictive with no recognition of the balancing provisions set out in the NPPF. Are more supportive of the alternative option to align more closely with/be reliant upon the NPPF	To cut out repetition across a number of historic environment policies the balancing provision has been covered in emerging Policy D16: Designated Heritage Assets.
Burpham Neighbourhood Forum		
Policy para 1)	This policy should be expanded to include a tighter list of requirements within heritage statements submitted as part of a planning application.	The supporting information requirements are a matter covered by emerging policy D16: Designated Heritage Assets.
Policy para 2b)	Should be all architectural details not just some as these run-in fads and what is considered rubbish one year is prized the next	The legislative test in relation to Conservation Areas is that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area, irrespective of 'architectural fads'. The requirements to assess the significance of the heritage asset during the application process, as well as the periodic reappraisal of Conservation Areas will help to enrich and define those features which contribute positively to the area's character and appearance.
Holy Trinity Amenity Group		
	A clear statement is needed that a CA Appraisal is a material consideration in application determinations, and that any approval	Conservation Area Appraisals are a material consideration in planning decisions irrespective of whether they are cited within policy or not. The decision has been taken to not include

	will include a statement that the scheme is consistent with the appraisal.	reference to them with the policy. However, a statement has been provided within the supporting text. With regards to the request for the inclusion of a 'statement' that the scheme is consistent with the appraisal this is not within the scope of the policy.
	A clearer policy is required for retention of traditional, and original materials for CAs plastic windows and doors.	The policy has been amended to provide a little further clarity by giving some examples with the supporting text expanding on this even further.
Taylor Wimpey		
	Given the content of Policy D16 this policy does not seem necessary. Key points can be incorporated into Policy D16	The quality, variety and the extent of the historic environment within the Guildford district requires a more comprehensive and robust policy framework that is specifically tailored to each of the asset types to aid with their preservation and enhancement. The aim of this policy is to provide additional clarity on how the Council will achieve this, that is specific to Schedule Monuments and Registered Parks and Gardens. Whilst such a suggestion of consolidating this policy into emerging policy D16: Designated Heritage Assets is valid and feasible, particularly as it is in line with the single approach taken by the NPPF there is a concern that it would result in a very lengthy policy which is not user friendly.
Guildford Residents' Association		
	Want greater use of Article 4 Directions, which should also cover listed buildings as a matter of course	Article 4 Directions are outside the scope of the policy There is no restriction on the permitted development right in respect of listed buildings, however they are not necessary as listed building consent would cover all potentially harmful works that would otherwise be permitted development under the planning regime.
Guildford Society		

	The specific protection given by 2003 Policy HE9 against demolition in conservation areas is not in new D18. It should be included.	The matter of demolition/harm has been addressed in emerging Policy D16: Designated Heritage Assets.
	Would prefer to see a presumption to approve designs that blend with the conservation area	The legislative test in relation to Conservation Areas is to preserve or enhance, which the policy identifies. It also requires that development proposals are to be of a high-quality design and sets an expectation that they take the opportunity to enhance the special interest. Further still it requires that designs reinforce or complement character and local distinctiveness.
Martin Grant Homes		
	The legislative test relating to conservation areas is to 'preserve or enhance' the use of 'and' is inappropriate. We therefore recommend the policy is amended to be in line with the relevant legislative test and the NPPF.	Agreed - The policy has been amended to correct this.
The Woodland Trust		
	Recommend the Council provide guidance on appropriate replacement of any trees lost through development, ageing or disease and encourage new planting to support and enhance the character of the area.	The matter of tree planting is addressed in the emerging policy P6/P7: Biodiversity in New Developments.
	Where tree removal is unavoidable, we recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on <i>Local Authority Tree Strategies</i> (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees. We would further encourage the specification where possible of UK sourced and grown tree stock for new planting, in line with policy P6 above, to support biodiversity and resilience.	The matter of tree planting is addressed in the emerging policy P6/P7: Biodiversity in New Developments.

The National Trust		
	Suggests that the regard to relevant Conservation Area appraisals should be where these are up to date and consistent with National Policy guidance.	The appraisals that have been published have all been undertaken in accordance with national guidance at the time. If aspects of the Conservation Area Appraisal are no longer in line with national policies, this aspect will not be relevant to the decision maker.
Residents for Guildford and Villages / Guildford Green Belt Group		
	Concerned with the lack of evidence base and supporting documentation surrounding conservation areas meaning that GBC is reliant on applicants to provide evidence with applications with no evidence base against which to assess them	<p>Disagree. Ultimately para 189 of the NPPF places the requirement on the applicant to describe the significance of any heritage asset, when making an application, whilst the Local Planning Authorities obligation is to either maintain or have access to an up-to-date Historic Environment Record, which is set out in para 187 of the NPPF, and to identify and assess the particular significance of any heritage asset that may be affected by a proposal, as set out in para 190 of the NPPF.</p> <p>The Council has a comprehensive evidence base which can be publicly accessed via the Authority's online interactive map and is updated accordingly when changes are issued. It includes:</p> <ul style="list-style-type: none"> Listed Buildings; Conservation Areas; Schedule Monuments; Historic Parks & Gardens Locally Listed Buildings; Article 4 Directions; County Sites of Archaeological Importance Areas of High Archaeological Potential

		<p>Landscape Character Assessment</p> <p>Supplement to that, the Authority has published a Historic Environment Information (2016) document as part of its evidence base which is a collection of all the above information along with other relevant sources on matters such as:</p> <ul style="list-style-type: none"> Locally designated Historic Parks and Gardens Heritage at Risk Residential Character - Residential Design Guide SPG War Memorials <p>This document has also set out the Authority's intention when it comes the appraising of Conservation Areas during the duration of the Local Plan period, and those that have been appraised in accordance with the latest guidance are able to be viewed publicly through the Council's website.</p> <p>In addition to all of the above, the Council and the general public also has access to the Historic Environment Record provided and maintained by Surrey County Council.</p>
	<p>Necessary for GBC to show as part of the DMP process how it has sought to comply with the duty to review conservation areas in order to provide a strong evidence base against which applications will be determined.</p>	<p>This is outside of the scope of the Policy.</p> <p>However, the supporting text does make reference to the Council's commitment to preparing character appraisals for those Conservation Area that do not yet have an appraisal in place.</p>
<p>Other respondents</p>		

	Conservation Areas should have the protection of Article 4 Directions	Article 4 Directions are outside the scope of policy
	Strong wording of Local Plan 2003 Policy HE10 has been omitted and would strengthen proposed policy <i>The Borough Council will not grant permission for development which would harm the setting of conservation area, or views into or out of that area."</i>	The matter of demolition/harm has been addressed in emerging Policy D16: Designated Heritage Assets.
	Presumption against demolition in conservation areas is not covered by new policy and should be included	The matter of demolition/harm has been addressed in emerging Policy D16: Designated Heritage Assets.
	Consideration of local opinion should be taken into account when considering changes to Conservation areas.	In terms of development within a Conservation Area, the Planning Permission process is subject to a formal period of public consultation in which representations can be made. This is prescribed in article 15 of the Development Management Procedure Order (as amended). When it comes to designating, reviewing and amending conservation area boundaries there is no obligation to carry out public consultation prior to their designation or amendment, however, it is best practice to do so.

Policy D19 Scheduled Monuments & Registered Parks and Gardens		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		
	Scheduled monuments and registered parks and gardens are subject to different legislative regimes and therefore specific policy requirements; a distinct policy for each of these asset types should be considered.	Agreed - These particular heritage asset type have now been given their own distinct policy. D19: Scheduled Monuments and D19a Registered Parks and Gardens.
Surrey County Council		
	Suggest it might be preferable and clearer to have separate policies for these two markedly different classes of heritage asset due to different protection regimes	Agreed - These particular heritage asset type have now been given their own distinct policy. D19: Scheduled Monuments and D19a Registered Parks and Gardens.
Other organisations		
Surrey Gardens Trust		
Policy Para (3d)	Only refers to views out – should be both in and out	Agreed – Amendments have been made to Policy 19a: Registered Parks and Gardens. It now refers to key views into, through or out of the park or garden.
West Horsley Parish Council		
	Note that there are places where an historic park has been broken up in the past but the surrounding area still retains elements of that setting and it needs to be protected.	The policy has been amended to give additional emphasis to the matter of setting and views. It now cites that development proposals are required to demonstrate that, amongst other things, it causes no unacceptable harm to setting, and that it respects the integrity of landscape and key views.
Guildford Society		

	<p>Policy contains more detailed than 2003 policies – Contains the presumption against ‘substantial harm’ to or loss of. Questioned whether this should be strengthened to ‘less than substantial harm’?</p>	<p>The NPPF stipulates that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment.</p> <p>The matter of demolition/harm has been addressed in emerging Policy D16: Designated Heritage Assets. This covers both substantial harm and less than substantial harm.</p>
<p>Martin Grant Homes</p>		
	<p>Recommend that the policy is simplified to reflect the principles set out in the NPPF - consider that this policy should set out that proposals that result in harm to the historic structure, character, key components or setting of a Registered Park and Garden will be resisted.</p>	<p>The NPPF stipulates that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment.</p> <p>The matter of demolition/harm has been addressed in emerging Policy D16: Designated Heritage Assets. This covers both substantial harm and less than substantial harm.</p>
<p>Taylor Wimpey</p>		
	<p>Policy does not seem necessary given the content of Policy D16 Suggestion of: <i>“Proposals materially affecting a Scheduled Monument or a registered historic park and garden will be expected to pay consideration to preserving or enhancing the special historic interest and there will be a presumption against substantial harm to or loss”.</i></p>	<p>The quality, variety and the extent of the historic environment within the Guildford district requires a more comprehensive and robust policy framework that is specifically tailored to each of the asset types to aid with their preservation and enhancement. The aim of this policy is to provide additional clarity on how the Council will achieve this, that is specific to Schedule Monuments and Registered Parks and Gardens. Whilst such a suggestion of consolidating this policy into emerging policy D16: Designated Heritage Assets is valid and feasible, particularly as it is in line with the single approach taken by the NPPF there is a concern that it would result in a very lengthy policy which is not user friendly.</p> <p>A further consideration is that these two types of heritage assets come under different legislative regimes</p>

Policy D20 Non-designated Heritage Assets		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Surrey County Council		
	<p>Section on non-designated does not address the possibility of as yet unknown or unidentified archaeological remains being encountered. Section 2) of the preferred option indicates the safeguarding of sites “which are identified during the pre-application or application processes” but does not outline how this can be achieved in areas outside of those already known to be of archaeological potential or significance. The council’s “objective” as set out in the preferred option, could only be fulfilled if a mechanism for evaluating the possibility for undiscovered archaeology to be present on large scale sites is included. Request that a mechanism similar to Policy HE11 (2003) is reintroduced to provide a “pro-active” strategy for protecting and enhancing the historic environment can be maintained where questions about undiscovered archaeological remains might arise.</p>	<p>Agreed. The policy has been amended to say that where development involves ground disturbance on any site exceeding 0.4 hectares a preliminary archaeological site evaluation will be required as part of the planning application.</p> <p>The 0.4 hectares value has been taken forward from the 2003 Local Plan and is consistent with other Surrey Local Authorities.</p>
Policy Para (1)	<p>should specifically state that “archaeological desk-based assessment” will be required on archaeologically-sensitive sites.</p>	<p>Agreed – The policy has been amended to stipulate that an archaeological desk-based assessment, and where appropriate a field evaluation for all non-designated assets of archaeological interest and for sites where there is the possibility for sites which affects or has the potential to affect Non-designated Heritage Assets of Archaeological Interest and development sites exceeding 0.4ha.</p>

Historic England		
	Scheduled monuments and registered parks and gardens are subject to different legislative regimes and therefore specific policy requirements; a distinct policy for each of these asset types should be considered.	Agreed - These particular heritage asset type have now been given their own distinct policy. D19: Scheduled Monuments and D19a Registered Parks and Gardens.
Other organisations		
Merrow Residents' Association		
	Suggest that permitted development rights should automatically be withdrawn from all locally listed buildings in order to provide adequate control over any proposed alterations to the appearance and setting of these heritage assets	The automatic removal of permitted development rights from locally listed buildings are beyond the scope of the policy.
Guildford Society		
	Should be links to the Council's lists of the assets set out in Table 2	The Authority has already collated and published an evidence list of key heritage assets. This document, titled Guildford Borough Historic Environment Information, can be publicly accessed via the Council's website. It pulls together the information that we have on the borough's heritage assets, with the caveat that details can change over time. A link to this document has been included within the supporting text of the policy, furthermore, the policy template has a key evidence box in which this document is cited.
	Should be a reference to the procedure for regular reviews of the lists, making additions to and deletions from the lists.	The criteria used is the same as that which is identified in Historic England's guidance document – Local Heritage Listing; Historic England Advice Note 7. A reference to this has been included within the supporting text, furthermore, the policy template has a key evidence box in which this document is cited
Martin Grant Homes		

	NPPF does not use the phrase 'public benefits' in relation to considering harm to non-designated heritage assets. Any policy relating to non-designated assets needs to reflect this and not be overly prescriptive in terms of assessing this type of application.	Agreed - the term public benefit has been removed from the policy.
Holy Trinity Amenity Group		
	Rewording of title is desirable to clarify that this does refer to designated assets, but only locally designated ones, as opposed to assets designated under statute.	The title reflects the terminology within the NPPF. The supporting text provides clarification on what assets this encompasses to provide clarity.
	Retain 2003 wording for policy and explanation to give the same protection for locally listed buildings as for those statutorily listed, except in the case where an application is taken to appeal.	Disagree - The NPPF sets a different assessment for proposals directly or indirectly affecting a non-designated heritage asset, thus it would be contrary to national policy for the same protection to be given to both designated and non-designate heritage assets. The policy makes clear that significance will be assessed against national policy and guidance.
Reach PLC		
	It is important to note that "a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets." (PPG, paragraph: 039 Reference ID: 18a-039-20190723).	Agreed – A reference to this has been included within the supporting text of the policy
	Policy should recognise that to reuse such assets there is often a need to remove and replace other lower quality ancillary buildings within the vicinity.	Unlike statutory listed buildings, where legislation stipulates that buildings and other structures within the curtilage are to be treated as part of the listed building, there is no such provision for locally listed buildings. The policy does instruct that proposed development are designed and sited with consideration to the conservation of the asset and its setting, but this would not prevent the removal of buildings and structures that do not contribute to significance.

	Important that any policy, as set out in the preferred option, ensures that a Statement of Significance and Impact is proportionate to the significance of that asset and that a balanced judgement is given to the scale of harm against the benefits of the proposal.	Noted. The requirement for a proportionate statement was stipulated within the consultation document. The emerging policy does not alter this.
Burpham Neighbourhood Forum		
Para 5.1.97 - Table 2	Include a full list of non-designated heritage assets as an Appendix and include document locations	The Authority has already collated and published an evidence list of key heritage assets. This document, titled Guildford Borough Historic Environment Information, can be publicly accessed via the Council's website. It pulls together the information that we have on the borough's heritage assets, with the caveat that details can change over time. A link to this document has been included within the supporting text of the policy, furthermore, the policy template has a key evidence box in which this document is cited.
Policy Para (1)	Statement of Significance needs support of an independent assessment	Disagree - Ultimately para 189 of the NPPF places the requirement on the applicant to describe the significance of any heritage asset, when making an application, whilst the Local Planning Authorities' obligation is to either maintain or have access to an up to date historic environment record, which is set out in para 187 of the NPPF, and to identify and assess the particular significance of any heritage asset that may be affected by a proposal, as set out in para 190 of the NPPF.
Policy Para (2)	Reference to Neighbourhood Plans	Locally important buildings cited within Neighbourhood Plans would be considered a non-designated heritage asset, thus would be assessed against this policy. A reference to this has been included within the supporting text.
Other respondents		

	Permitted development rights should automatically be withdrawn from all locally listed buildings in order to provide adequate control over any proposed alterations to the appearance and setting of these heritage assets	The automatic removal of permitted development rights from locally listed buildings are beyond the scope of the policy.
	Should be links to the Council's lists of the assets set out in Table 2	The Authority has already collated and published an evidence list of key heritage assets. This document, titled Guildford Borough Historic Environment Information, can be publicly accessed via the Council's website. It pulls together the information that we have on the borough's heritage assets, with the caveat that details can change over time. A link to this document has been included within the supporting text of the policy, furthermore, the policy template has a key evidence box in which this document is cited
	Reference to the procedure for making additions to the lists	The criteria used is the same as that which is identified in Historic England's guidance document – Local Heritage Listing; Historic England Advice Note 7. A reference to this has been included in the supporting text.
	Policy needs to be clear that if an application would be detrimental to the non-designated heritage asset, it should be refused, rather than allowing these considerations to compromise other policies	The proposed policy has been purposefully designed to be positively worded. However, the identified criteria does enable the refusal of applications if not met.

Policy ID5: Protecting Open Space		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Department for Education		
Policy para 3)	<p>As drafted, it is not considered that this policy is wholly compliant with the NPPF, and it is not sufficiently tightly worded to be helpful to applicants understand the qualitative elements in the policy.</p> <p>Part 3 asserts that there should be no loss of space that has 'specific nature, conservation, historic, cultural or recreational value.' This definition is very broad and includes objective judgement, which will make the policy difficult to interpret for applicants.</p> <p>The NPPF (paragraph 97) sets out clearly the criteria for loss of open space, which does not include other descriptors as included at part 3 of the policy. We therefore propose that this policy point be removed.</p>	Other Local Plan policies protect other types of space that are important for conservation or heritage reasons. We have therefore deleted this clause from the policy. The policy was intended to deal only with the protection of open space that is purposed for recreational value.
Historic England		
	<p>Agree, in as far as the policy relates to historic character of open spaces; e.g. some non-designated public open spaces have surviving historic character, in whole or in part, such as Stoke Park which it would be appropriate to protect.</p>	Other Local Plan policies protect other types of space that are important for conservation and heritage reasons. We have therefore deleted this clause from the policy and provided further clarification in the reasoned justification of the policy's role, which is to deal with the protection of open space for recreational value.
Surrey Nature Partnership		

	Supported.	Noted.
Other organisations		
Burpham Neighbourhood Forum		
Para 6.3	The tests that would be expected to be made for assessments that clearly shows an open space is surplus to requirements should be specified. The bar should be relatively high to justify the loss of any open space.	Our view is that the applicant should be responsible for developing evidence that open space is surplus to requirements. It is not reasonable to specify the appropriate evidence in advance as there may be different ways of establishing a surplus depending on the type and location of the space. The supporting text includes some brief guidance on the types of issues that applicants will need to address when preparing evidence to support their case.
Para 6.3	Please define 'better provision.'	The text of the introduction defines "better provision", as being "in terms of quality and quantity in a suitable location". This is set out in NPPF paragraph 97 b).
Policy para 1a)	Re: "an analysis has shown that the land is no longer needed as open space". Who does the ultimate analysis? Would the Council appoint an external consultant to review?	Paragraph 1) is aligned with NPPF paragraph 97. The applicant would need to demonstrate that open space is surplus to requirements in line

		with this paragraph. It would be the planning decision maker (case officer) to consider whether a surplus exists.
Policy para 1b)	Re: "The loss of the space would not result in a deficit in open space in terms of accessibility, quality or quantity." Further information is required regarding thresholds.	The supporting text includes some brief guidance on the types of issues that applicants will need to address when preparing evidence to support proposals to develop open space, including how the proposal would or would not result in a deficit.
Policy para 1)	Clarify that the constraints that still apply in some circumstances, such as Neighbourhood Plan Local Space designations.	Other designations such as Local Green Spaces are already protected by the NPPF and usually also by neighbourhood plan policies. It is not necessary to repeat that protection in Local Plan policy. A reference to Local Green Space has been added to the supporting text to clarify this.
Policy	The wording should be tightened to emphasise that the weight of the policy is clearly against loss of the open green space. It is for the applicant to justify in strong terms why the loss of open green space is acceptable.	LPSS policy ID4 already protects open space in line with the NPPF. The NPPF prevents the loss of open space except in specific circumstances. Where those circumstances are met, it would not be compliant with the NPPF to apply an additional test of demonstrating

		why the loss of open space is acceptable.
East Clandon Parish Council		
	<p>The policy makes no reference to Local Green Spaces as designated by adopted Neighbourhood Plans. This designation represents a strong level of protection given to local spaces by a Neighbourhood Plan, as selected by local residents for their importance and significance, and should be included.</p>	<p>Neighbourhood Plans are development plan documents of equal status to the Local Plan. Where they identify Local Green Spaces, they are protected by the NPPF and usually also by neighbourhood plan policy and do not require further protection or clarification of NPPF provisions.</p> <p>Local Green Spaces cannot be treated the same way as other forms of open space because the NPPF allows open space to be developed in specific circumstances and does not apply those same exceptions to Local Green Space. Reference to Local Green Space has been added to the supporting text to clarify this.</p>
	<p>This policy should emphasize that the loss of open space will be resisted and that provision will be positively encouraged.</p>	<p>Policy ID4 of the Local Plan: Strategy and Sites protects Open Space in line with the NPPF. This policy provides further detail for that protection. Policy ID6 sets standards for provision of open space in new residential developments.</p>

East Horsley Parish Council		
	<p>Agree with the aims and requirements of Policy ID5 Preferred Option but we do not believe they are sufficient. ID5 makes no reference to Local Green Spaces as designated by adopted Neighbourhood Plans. This designation represents a strong level of protection given to local spaces by a Neighbourhood Plan, as selected by local residents for their importance and significance, and which may or may not coincide with the spaces as identified by GBC in the OSSRA. ID5 should be revised to include reference to Local Green Spaces as designated by adopted Neighbourhood Plans.</p>	<p>Neighbourhood Plans are development plan documents of equal status to the Local Plan. Where they identify Local Green Spaces, they are protected by the NPPF and usually also by neighbourhood plan policy and do not require further protection or clarification of NPPF provisions.</p> <p>Local Green Spaces cannot be treated the same way as other forms of open space because the NPPF allows open space to be developed in specific circumstances and does not apply those same exceptions to Local Green Space. Reference to Local Green Space has been added to the supporting text to clarify this.</p>
Effingham Parish Council		
	<p>The document is silent on SANGS and Commons such as Effingham Common. We are not clear why these have not been covered when there are lists of other designated sites in the policies.</p>	<p>SANGs are not designated by the Local Plan. They are protected by NPPF paragraph 176, which affords them the same protection as the European designated sites they protect. They are also usually protected through legal agreement with the Local Planning Authority.</p>

		<p>Common land is designated through a legal process and also benefits from legal protection.</p> <p>The policy addresses all open space that provides opportunities for recreation and sport in accordance with paragraph (8) of LPSS policy ID4: Green and blue infrastructure and therefore includes legally designated common land, which falls within the Amenity and Natural Green Space typologies.</p> <p>References to SANGs and Commons have been added in a footnote to the supporting text to clarify the above points.</p>
	<p>The environment policies miss an opportunity to look at topics such as the movements of wildlife through wildlife corridors and stepping-stones, light pollution in rural areas and dark skies. We are surprised about this as the policies in the Effingham Neighbourhood Plan were very much influenced by GBC planning staff who provided a good deal of help to EPC in the writing of these policies.</p>	<p>This is largely outside the scope of this policy. Biodiversity is addressed under other emerging Local Plan policies, in particular P6: Biodiversity in New Developments; Policy P7: Biodiversity Net Gain; and Policy D10a: Light Impacts and Dark Skies.</p> <p>Policy ID5 requires all developments on open spaces to achieve biodiversity net gains.</p>
<p>Guildford Residents' Association</p>		

	<p>It is recommended that 4) is strengthened by adding ‘...and does not harm its character or the local environment (by light pollution, for example)’.</p>	<p>The character of the local environment is protected through design policy elsewhere in the Local Plan, for example in LPSS Policy D1: Place shaping, as well as in the emerging Policy D18: Conservation Areas.</p> <p>Light pollution is adequately addressed in Policy D10a: Light Impacts and Dark Skies.</p>
	<p>This policy should emphasize that the loss of open space will be resisted and that provision will be positively encouraged.</p>	<p>Policy ID4 of the Local Plan: Strategy and Sites protects Open Space in line with the NPPF. This policy provides further detail for that protection.</p> <p>Proposed policy ID6 sets standards for provision of open space in new residential developments.</p>
<p>Guildford Society</p>		
	<p>The 2003 Policy R5 prohibited development on open space if there was harm to character and amenity. This seems to have got lost in the new Policy.</p>	<p>The plan includes design policies that protect character and amenity. The role of policy ID5 is to clarify policy ID4 and the NPPF’s protection of open space for recreational value rather than for its character.</p>
	<p>A clause needs to be added to avoid developments that cause light, noise pollution.</p>	<p>Noise and light pollution are already adequately covered by Policy D10: Noise Impacts and</p>

		Policy D10a Light Impacts and Dark Skies.
Guildford Vision Group		
	There is no specific reference to the river running through the town centre and its potential for recreation and sport, among other things.	Water that provides opportunities for recreation and sport (as identified in the OSSRA) is included within the definition of open space in Policy ID4 and is therefore protected by that policy. The River Wey within the town centre is also included within the River Wey and Guildford and Godalming Navigations conservation area and is therefore specifically protected by Policy D11 The Corridor of the River Wey and Godalming Navigations.
Holy Trinity Amenity Group		
	There does not seem to be any reference to the NPPF Local Green Space designation. This must be exploited if possible.	Local Green Spaces are not treated the same way as other forms of open space because the NPPF allows open space to be developed in specific circumstances and does not apply those same exceptions to Local Green Space. The NPPF sets out clear policy on how they should be treated and Neighbourhood Plans often also include further policy, which

		<p>carries the same weight at Local Plan policy.</p> <p>A reference to Local Green Space has been added to the supporting text.</p>
	Every dwelling should have some Amenity Green Space, however small.	Policy ID6 includes standards for provision of public Amenity Green Space.
	Retain the requirement that views to and from the AONB be protected.	Policy P1 of the Local Plan: Strategy and Sites protects the scenic beauty and setting of the AONB. It would not be reasonable to protect Open Space from development over and above the protection conferred by the NPPF.
Ockham Parish Council		
	Open Space protection should be preserved and we would not support repurposing or development except in exceptional circumstances and believe these could only occur when the purpose would be to enhance the space for additional sport/recreation purposes.	The NPPF allows the redevelopment of open space in a number of circumstances. Applying an “exceptional circumstances” test would not be compliant with the NPPF.
Residents for Guildford and Villages / Guildford Green Belt Group		
	The supporting text of policy ID5 references the Open Space Sport and Recreation Assessment (OSSRA) 2017. This document was prepared to guide the development of the Local Plan Part 1 and the consultation took place back in 2014. It is therefore considered necessary to update this as part of the development of the DMP.	The OSSRA was produced in 2017. The last pre-submission consultation on the Local Plan Part 1 was also in 2017. The situation regarding open space protection and provision has not

		substantially changed since 2017, so the OSSRA is considered up to date.
	The pressure on existing Open Spaces will substantially increase as the population of GBC grows with new housing growth in the coming years.	Policy ID6 has been worded to ensure that the amount, type and location of new open space delivered alongside new residential developments will keep pace with estimated future population growth.
	It should be made clear that its loss will only be permitted in very exceptional circumstances where the community has been engaged and are supportive of the alternative use being proposed.	Existing open space is protected by LPSS policy ID4 and the NPPF. The NPPF allows redevelopment of open space in limited circumstances, which do not include a test of “very exceptional circumstances”. Introducing such a test would therefore not comply with the NPPF. This policy provides additional clarity to the NPPF tests and so is aligned with the NPPF.
	There is a lack of reference to Local Green Space which forms an important part of several existing and emerging Local Neighbourhood Plans in the Borough such as East Horsley, West Horsley, Effingham and Burpham. The final wording of policy ID6 should include a requirement to protect existing Local Green Spaces.	Neighbourhood Plans are development plan documents of equal status to the Local Plan. Where they identify Local Green Spaces, they are protected by the NPPF and usually also by neighbourhood plan policy and do not require further protection or clarification of NPPF provisions.

		<p>Local Green Spaces cannot be treated the same way as other forms of open space because the NPPF allows open space to be developed in specific circumstances and does not apply those same exceptions to Local Green Space.</p> <p>A reference to Local Green Space has been added to the supporting text to clarify this.</p>
	<p>Parts 1a and 1b of the preferred approach are broadly in line with paragraph 97 of the framework but no reference is made to part c of paragraph 97 which states that open space should not be built on unless “the development is for alternative sports and recreation provision, the benefits of which clearly outweigh the loss of the current or former use.”</p> <p>This should be included within the final wording of policy ID5 with a much stronger requirement for the engagement of the local community, parish councils, neighbourhood plan bodies and other statutory bodies (such as Sport England).</p>	<p>Policy ID4 of the Local Plan: Strategy and Sites protects open space in line with the NPPF, and therefore already allows for “...the development of alternative sports and recreation provision...”. Paragraph 1 of the policy provides further clarification on NPPF para 97(a) only.</p> <p>Local residents and key stakeholders would be consulted on any application to redevelop an open space as part of the normal planning application process. It is not necessary to include further reference to this process in Local Plan policy.</p>
Ripley Parish Council		
	<p>Agree but reference should also be made to views to and from existing open space and protection should be given to those areas which form part of our wider rural and semi-rural</p>	<p>This policy provides clarity for the protection applied to open</p>

	<p>landscape. These areas often form part of our cherished informal open space for recreational purposes. It is very important to consider conditions on a case by case basis as suggested in policy ID5.</p>	<p>space of public value by the NPPF. The NPPF does not protect views to and from existing open space, except where it covers matters of character and amenity. The design policies in the plan require consideration of character, landscape and significant views.</p> <p>Protecting views of the countryside is beyond the remit of this policy.</p>
<p>Send Parish Council</p>		
	<p>Agree if reference to Local Green Spaces is included – this level of designation has the same value as Green Belt and cannot be ignored, especially as these spaces are identified through Neighbourhood Plans.</p>	<p>Neighbourhood Plans are development plan documents of equal status to the Local Plan. Where they identify Local Green Spaces, they are protected by the NPPF and usually also by neighbourhood plan policy and do not require further protection or clarification of NPPF provisions.</p> <p>Local Green Spaces cannot be treated the same way as other forms of Open Space because the NPPF allows open space to be developed in specific circumstances and does not apply those same exceptions to Local Green Space.</p>

		A reference to Local Green Space has been added to the supporting text to clarify this.
	The importance of open space needs to be highlighted with reference to mental health and well-being needs, and the growing importance of community space should be acknowledged.	The proposed reference has been added to the supporting text.
Shalford Parish Council		
	Policy ID5 should consider areas of "public visual amenity" as well as recreational open space and the value it brings to personal well-being and health which is one of the Core Visions under the theme of Community.	Policy ID4 protects land that meets the criteria of open space. Public visual amenity is protected through design policies.
Sport England		
	Sport England does not support the setting out of minimum standards to ascertain whether playing pitches/fields are potentially surplus to requirement or not. Such deliberations should be informed by a robust and up to date Playing Pitch Strategy, which would quantify current and future demand for playing field provision in line with NPPF paragraph 96. The wording of the policy should also be in conformity with NPPF paragraph 97.	Paragraph 1 of the policy makes it clear that exceedance of minimum standards will not justify development of open space on the basis that the land is surplus to requirements. The policy also explains that analysis of need and any qualitative or quantitative deficit in open space that would result from its loss would also need to be undertaken. This is in line with paragraph 97 of the NPPF. Policy ID4 also states that open space will be protected in line with the NPPF. The Open Space, Sport and Recreation Assessment 2017

		(OSSRA) satisfies the requirements of paragraph 96, although the Council intends to supplement the OSSRA with a playing pitch strategy in future.
	<p>Currently the authority does not have a robust sport and recreation facilities evidence base in place. Sport England would welcome the opportunity to engage in a proactive partnership with the authority to prepare a full and comprehensive sports evidence base. We can offer and draw on several strategic planning tools and work in collaboration with a number of external partners, including the National Governing Bodies (NGBs) in order to inform evidence base development via a Playing Pitch Strategy (PPS) and Built Facilities Strategy (BFS).</p> <p>Sport England has published endorsed methodologies to undertake robust assessments for sporting needs under NPPF paragraph 96 and these can be found by following the link below: https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#assessing_needs_and_playing_pitch_strategy_guidance</p>	<p>The Council intends to produce a Playing Pitch Strategy (PPS) which will supplement the Open Space, Sport and Recreation Assessment 2017 (OSSRA). The OSSRA sets out the need for quantities of different typologies of Open Space. The Parks and Recreation Space typology includes an allowance for sport pitches.</p> <p>The supporting text references the PPS.</p>
	<p>Sport England does not support the setting out of minimum standards to ascertain whether playing pitches/fields are potentially surplus to requirement or not. Such deliberations should be informed by a robust and up to date Playing Pitch Strategy, which would quantify current and future demand for playing field provision in line with NPPF paragraph 96. The wording of the policy should also be in conformity with NPPF paragraph 97.</p>	<p>Paragraph 1 of the policy makes it clear that exceedance of minimum standards will not justify development of open space on the basis that the land is surplus to requirements. The policy also explains that analysis of need and any qualitative or quantitative deficit in open space that would result from its loss would also need to be undertaken. This is in line with paragraph 97 of the NPPF.</p> <p>Policy ID4 also states that open space will be protected in line with the NPPF.</p>

		The Open Space, Sport and Recreation Assessment 2017 (OSSRA) satisfies the requirements of paragraph 96, although the Council intends to supplement the OSSRA with a playing pitch strategy in future
West Horsley Parish Council		
Policy para. 4)	Point 4 needs clarifying.	The last criterion of the policy supports development which would improve or help to maintain an open space. Examples could include engineering works to improve drainage or new or upgrades to existing facilities, such as a cricket pavilion. Explanation has been added to the supporting text.
	This policy should emphasise that the loss of open space will be resisted and that provision will be positively encouraged.	Policy ID5 and paragraph (8) of LPSS Policy ID4: Green and blue infrastructure both protect open space in line with the NPPF. Policy ID6 sets out requirements for provision of open space alongside new residential developments.
	Reference to Neighbourhood Plans should be included. Reference to Local Green Spaces must be included – this level of designation has the same value as Green Belt and cannot be ignored, especially as these spaces are identified through Neighbourhood Plans.	Neighbourhood Plans are development plan documents of equal status to the Local Plan. Where they identify Local Green Spaces, they are protected by the NPPF and

		<p>usually also by neighbourhood plan policy and do not require further protection or clarification of NPPF provisions.</p> <p>Local Green Spaces cannot be treated the same way as other forms of open space because the NPPF allows open space to be developed in specific circumstances and does not apply those same exceptions to Local Green Space. Reference to Local Green Space has been added to the supporting text to clarify this.</p>
Woodland Trust		
	<p>Support. In addition, we would encourage policies to enhance the quality of existing open space, in particular enriching the landscape and habitat connectivity with appropriate new tree planting.</p>	<p>Development that would enhance open space would be supported by the last paragraph of the policy, as well as point (2) which requires achievement of biodiversity net gain on open space sites where development occurs.</p> <p>The biodiversity policies provide general support for tree planting in the right locations.</p>
Other respondents		
Policy para 4)	<p>it is hard to see how a development on the open space will be beneficial</p>	<p>Works that constitute development may be necessary to maintain or improve open space. The supporting text</p>

		explains the meaning of beneficial development and gives examples. These might include engineering works to improve drainage or upgrading existing facilities on the site.
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DRAFT

Policy ID6: Open Space in New Developments		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Environment Agency		
	Natural green space can be multifunctional and provide wider benefits such as contributions to biodiversity net gain, floodplain storage and improved mental health and wellbeing. This should be considered when developing Blue and Green Infrastructure policies/SPD.	The plan reflects the need for open space to provide a range of benefits. This approach will be incorporated into the SPD.
Surrey County Council		
	Strongly support the preferred option, particularly point 9 on the need for new open spaces to be multi-functional and to deliver a range of benefits.	Noted.
Surrey Nature Partnership		
6.11	Supported. (Open space typologies) Additional text is recommended here to emphasise that any/all open space can be managed to support enhanced biodiversity regardless of its 'primary' function. This would then further justify clause (9) of the following policy.	Noted. Supporting text has been added to make it clear that open space of all types can be managed to support biodiversity.
Other organisations		
Surrey Wildlife Trust		
6.11	Supported. (Open space typologies) Additional text is recommended here to emphasise that any/all open space can be managed to support enhanced biodiversity regardless of its 'primary' function. This would then further justify clause (9) of the following policy.	Noted. Supporting text has been added to make it clear that open space of all types can be managed to support biodiversity.

Guildford Residents' Association		
	It is not clear how 'best value in terms of multi-functional benefits' will be measured.	Decision makers on planning applications will judge whether best value has been achieved.
	Why is the play space standard for 'youth' only 0.03ha?	<p>The current provision of youth play space is 0.01ha per 1,000 people (see section 6 of the Council's Open Space Sports and Recreation Assessment (OSSRA)); therefore, the proposed minimum standard of 0.03ha represents a significant uplift on current provision. 0.03ha was the figure recommended by the OSSRA, informed by resident surveys. These identified a current undersupply and need for increased overall provision.</p> <p>The proposed minimum figure refers only to play equipment and facilities (e.g. playgrounds and skate parks), and not adjacent open space or buffers. The extant Local Plan 2003 standard for children's play space included play equipment/facilities and also the open space around them, which is why the minimum provision was set at 0.8ha per 1,000 people. Land around play equipment/facilities is now incorporated into the proposed new minimum standard for amenity and natural green space.</p>
	Small developments should provide play space for children	Play spaces are generally expected to be separated from dwellings by a specified buffer, depending on the type of play equipment provided. As a result of the land take, smaller developments are unlikely to be able to provide these on site. These developments will still be expected to contribute to provision or enhancement of play facilities off site. There is still an emphasis on play space being accessible and within walking distance of homes.
Send Parish Council		

	The importance of open space needs to be highlighted with reference to mental health and well-being needs, and the growing importance of community space should be acknowledged.	Supporting text has been added which includes these references.
Guildford Society		
Policy para. 2)	<p>The new Open Space standards are serious reductions in the requirements for open space provision compared with 2003 Policy R2. Consequent reduction in amenity for future residents compared with the past. We are building for the future, shouldn't be reducing standards.</p> <ul style="list-style-type: none"> • The 2003 Policy covered all developments of 25 dwellings or more. The new Policy differentiates between types of space and sizes of developments. For example 'Parks and recreation grounds' and 'Play space (youth)' are only required for developments of 250+ dwellings. • The 2003 standard for 'children's play spaces' was 0.8ha per 1,000 people. It is 0.05ha in the new Policy, and that only for developments of 50+ dwellings. • The new Policy also does not include the provision for small developments offered by 2003 Policy R3, which covers developments between 5 and 25 units. 	<p>The NPPF at paragraph 96 states: "Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate."</p> <p>The Council produced the Open Space Sports and Recreation Assessment (OSSRA) to meet this requirement. The OSSRA sets out the new standards and explains how they were derived. The proposed standards are higher than current provision and will lead to an increase in open space over current levels per head of population. The total quantum reduction over the 2003 standards is minor, falling from 28m² per person to 26.8m² per person.</p> <p>The current provision of child play space is 0.04ha per 1,000 people, therefore the proposed minimum standard of 0.05ha represents an increase on current provision. The standards for all types of open space in the policy are based on recommendations in the OSSRA to meet the level of demand as shown by resident surveys carried out for this study.</p> <p>The respondent's point that no contribution would be required for children's play space on schemes of below 50 dwellings is incorrect – The new requirements are for on-site provision above the policy's stated thresholds, with financial contributions towards provision of open space of each particular typology required below these</p>

		<p>thresholds. The policy wording has been amended slightly to make this clearer.</p> <p>The proposed minimum standard for play spaces refers only to play equipment and facilities (e.g. playgrounds and skate parks), and not adjacent open space or buffers. The extant Local Plan 2003 standard for children's play space included play equipment/facilities and also the open space around them, which is why the minimum provision was set at 0.8ha per 1,000 people. Land around play equipment/facilities is now incorporated into the proposed new minimum standard for amenity and natural green space, rather than part of the play space standard.</p> <p>The Council has produced an open space topic paper which sets out the reason for the proposed standards.</p>
Policy para. 3)	The time to walk to a play space for children seems optimistic would suggest the distance is reduced to 300m.	The maximum walking distance for child play space was established through the OSSRA and based on surveys of local residents. The NPPF requires open space policies to be evidence-based.
Woodland Trust		
Policy para 3)	<p>We note that section 4) includes Natural England's Accessible Natural Green Space Standard. The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard which should be added to the table in para. 3:</p> <ul style="list-style-type: none"> • No person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. • There should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes. 	<p>The plan includes biodiversity policies which support the planting of trees and biodiversity more widely.</p> <p>It would not be reasonable to require development to provide woodland off site. However, any developments on open space will result in biodiversity net gains (required under policy ID5) which is likely to include an off-site, as well as on-site component.</p>
Bridge End Farm		

	Strategic sites may come forward through a series of separate planning applications. Open Space provision should be assessed on the basis of the masterplan, not the individual applications. The masterplan should demonstrate how the appropriate standards are to be met within the whole allocation.	The Council's expectation is that open space provision will be achieved <u>across the whole of strategic sites</u> . The SDF SPD indicates that the outline application master plan should demonstrate how the Council's expectation for open space provision will be achieved. Planning applications will be consistent with the masterplan, which must be kept under review (as per Policy D1(15)). Open space provision will thus be considered in relation to outline applications (incorporating a masterplan) for the strategic sites, as well as individual (reserved matter) applications.
Holy Trinity Amenity Group		
	Intensification of residential areas increases the deficit of Open Space. A levy should be placed on development for new Open Space.	The policy places a requirement on new development to fund or provide new open space.
	SANGS monies are often not used to acquire new open space, but to subsidise maintenance of existing public open space. SANGs money should be used to provide new Open Space for dog walkers.	The SANG guidelines produced by Natural England allow SANGs to be brought forward on existing open space where access is improved or quality is enhanced to unlock additional capacity. The Council does not produce the SANG guidelines. The borough has a number of existing and proposed SANGs that have been brought forward on new open space.
Weyside Urban Village		
Policy paras 2) and 3)	The tables within the policy should also include reference to a community orchard as a type of open space that could be provided, which may be more practical than allotments as growing space on certain sizes or densities of development.	The first table of the policy (numbered Table ID6b in the Regulation 19 policy ID6) indicates that on-site provision of allotments will only be required for strategic sites in the LPSS. For other residential developments the quantity standard for allotments (in Table ID6a) will apply as a financial contribution towards offsite allotment provision and/or enhancement of existing allotments.

		Community orchards may be considered as an alternative form of community growing space (provision of which is required to be considered) in certain situations but would not be likely to be considered a suitable alternative to allotments, for which the OSSRA identified an under-provision across the borough.
Policy para 8)	Criterion 8 that references commercial sites should be clear as to whether this also means industrial sites.	The policy has been amended to refer to non-residential developments to make it clear that industrial sites are also included.
	We would suggest that the policy includes a reference to situations where a site or development cannot provide required types or quantum of open space on site, which could be for a number of reasons, that such a development can make financial contributions to improve clearly identified existing open spaces/facilities in the surrounding local area, which in some circumstances may present a more practical and logical solution to enhancing facilities and amenity for existing and future residents.	The policy has been amended to state that where it is not feasible to provide open space onsite, a financial contribution will be sought instead.
Guildford Vision Group		
	The riverside again gets missed out. It is particularly important that the 'linking' provisions e.g. paths and cycleways are borne in mind re any riverside development.	Policy D11: Corridor of the River Wey and Godalming Navigations will address this matter very specifically through requirements for high quality design in the vicinity of the River Wey, provision of publicly accessible walkways and cycle routes and improvements to landscaping and biodiversity of riverside developments. The matter is also covered more generally in paragraph (7) of Policy D1: Place Shaping.
Compton Parish Council		
	More land should be allocated to allotments. There is a growing trend for families to grow their own food, and lengthy waiting lists for existing allotments across the borough.	The proposed standard for allotments represents an increase in provision for allotments against current provision (current provision is 0.23 ha/1000 and the proposed standard is 0.25 ha/1000). This uplift is based

		<p>on data obtained from surveys of the need for different types of open space (see the OSSRA).</p> <p>The NPPF states that planning for Open Space must be based on robust and up-to-date assessments of need. Evidence from the OSSRA shows that this is an appropriate requirement.</p>
	<p>It is unclear as to how thresholds will be dealt with when land is sold and developed by more than one developer. For example, if developer A builds 49 houses, he/she is not required to implement additional play spaces etc. Then, if developer B also builds 49 houses and is also under the threshold, this could result in a development of almost 100 houses with no 'green infrastructure'. Policies must account for accumulative impact.</p>	<p>Sites that fall below the thresholds for on-site provision in Table ID6b of the policy are encouraged to provide open space on site where possible. However, where schemes do not provide land for open space, they must still contribute funding towards it to ensure that where possible the expected quantity and access standards in Table ID6a are met.</p> <p>The planning process also allows decision makers to consider whether land has been subdivided unreasonably to avoid planning obligations. This is proposed to be clarified further in relation to residential intensification in policy D9.</p>
<p>Portland Capital</p>		
	<p>Portland Capital request that the alternative option identified above is progressed with each site being reviewed on a case by case basis. This also applies to the provision of 'community growing space' and the type of open space to be provided referenced at points 5 and 7 of indicative policy. Thresholds which are driven solely by unit numbers is not appropriate and gives no recognition for wider site viability and constraints.</p> <p>Wording should include reference to viability reflective of the consideration of viability identified within the NPPF at paragraph 67 (viability and paragraph 122 (achieving appropriate densities and efficient use of land).</p> <p>The preferred option is too inflexible and too prescriptive to facilitate and encourage delivery. There are potentially significant benefits of enabling sustainable town centre sites that could be jeopardised by over-</p>	<p>The NPPF states that the planning system should be plan-led (para. 15). As a result, our view is that open space standards should be set out in policy.</p> <p>The policy has been amended to state that where on site provision of open space is clearly not feasible a financial contribution may be sought instead.</p> <p>The plan will be subject to viability testing. Where a particular site has a specific viability issue, the NPPF allows for this to be reconsidered at the planning application stage (see paragraph 57). As a result, it is not necessary to include a viability clause in the policy.</p>

	<p>burdening such sites with specific significant policy requirements. Suggest wording is updated to set broad aspirations for open space delivery or to revert to the alternative option of not having a specific policy governing the provision of open space.</p> <p>If the draft policy is retained wording should allow flexibility relative to the provision of open space where this may compromise wider residential delivery and be reviewed on a site by site basis.</p>	
Martin Grant Homes		
	<p>Support the intention to seek open spaces which are multi-functional so that multiple benefits can be achieved. However, it should be acknowledged that not all open spaces may be able to deliver multiple functions or all of the identified benefits. In this regard, while the principle is supported, we recommend that Policy ID6, where appropriate, seeks open spaces to have multiple potential functions.</p>	<p>This point is agreed. The policy has been amended to refer to the delivery of multi-functional benefits “wherever possible”.</p> <p>The supporting text has been amended to provide further guidance.</p>
Policy para. 3)	<p>Accessibility standards for the open space typologies: We are concerned that following rigid accessibility standards can compromise the layout and design of certain schemes. To this end, this approach does not always take into consideration the best areas within a site for certain typologies. We therefore recommend the wording in (3) should say:</p> <p>“Where new open space is provided, it should, where possible and appropriate, meet the following quantity and access standards”</p>	<p>The NPPF states that the planning system should be plan-led (para. 15). As a result, our view is that open space standards should be set out in policy.</p> <p>The policy has been amended to state that where on site provision of open space is clearly not feasible a financial contribution may be sought as an alternative to finance provision of off-site open space and/or enhancement of existing open space instead. This will help to ensure that the preferential requirement for on-site provision will not compromise good placemaking. The wording of Table ID6a has also been amended to change the ‘maximum distance’ in the heading for Access standard to an ‘expected maximum distance’. This will help to ensure that whilst the quantity standard is a clear requirement for all sites, the access standards may be more flexible in cases where these cannot be met without compromising the layout and design of a scheme.</p>
Hallam Land Management		

	<p>The Preferred Option identifies the Open Space standards that will be applied to developments of different scales. For the Local Plan's Strategic Sites, a complete suite of open space typologies is required. In the case of Wisley Airfield, this Strategic Site will be brought forward under a number of planning applications; the Hallam portion being a small site of approximately 100 dwellings as acknowledged in the Strategic Site SPD. On this basis, the types of open space will be more limited and commensurate with the scale of resident population. For example, the Parks and Garden Standard cannot practically require playing field provision as part of the small development, and in any event, such provision would be provided as part of the overall masterplan for the Strategic Site.</p> <p>This is a matter that will require consideration through the formulation of the overarching masterplan for this Strategic Site as there will be sound planning reasons that lead the distribution of open space across the whole site that differs from strict application of the standards in the Policy to subsequent applications.</p>	<p>The Council's expectation is that open space provision will be achieved across the whole of strategic sites. The Strategic Delivery Framework (SDF) SPD indicates that the outline application master plan should demonstrate how the Council's expectation for open space provision will be achieved. Planning applications will be consistent with the masterplan, which must be kept under review (as per LPSS Policy D1(15)). Open space provision will thus be considered in relation to outline applications (incorporating a masterplan) for the strategic sites, as well as individual (reserved matter) applications.</p>
Residents for Guildford and Villages / Guildford Green Belt Group		
6.11	<p>The NPPF defines Open Space as "All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity." This definition is far wider than the typologies as set out in paragraph 6.11.</p> <p>The typologies within the policy and associated wording should be widened in recognition of the significant differences in areas of existing open space within GBC.</p>	<p>The typologies at 6.11 refer only to the sorts of open space that developers are required to fund or provide, and this list is limited by practicality. It is not practical to ask for the provision or funding of other types of open space that have public value (e.g. lakes and rivers, woodlands and heathlands).</p>
Ripley Parish Council		
Policy paragraphs 2) and 3)	<p>The standards referred to for new developments should be significantly enhanced in the rural and semi-rural locations. Urban development in the centre of Guildford will probably have a higher density because of the cost of land. It is important in the locations such as Ripley that these new developments sit gently within the existing communities and</p>	<p>The NPPF requires Open Space policies to "be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision." (paragraph 97) As a</p>

	<p>landscape. Therefore the establishment of open space within the design of a new development is essential not only to the wellbeing of those residents but also that it offers a cohesive feel within its surroundings.</p> <p>We would agree that a case by case basis would be beneficial but we suggest that GBC has the opportunity to establish and insist upon higher standards and deliver a very much higher degree of open space within new developments than the national norm suggested in NPPF.</p>	<p>result, open space provision must be based on the need for open space established through assessments. The OSSRA conducted a survey to establish current need, which has informed the proposed standards.</p> <p>Uplifting the requirement in order to protect local character would not be in conformity with the NPPF. The plan includes policies that govern character and design, which will be used to ensure development respects local character, for example LPSS policies D1: Place shaping and D4: High quality design and local distinctiveness. The open space standards are a minimum and will not preclude developers exceeding them in order to ensure that a scheme's design reflects the area's distinct local character.</p>
West Horsley Parish Council		
	<p>Agree. Crucial to provide space for new communities and links to other open spaces via the establishment of green networks/infrastructure. Reference should be made to increased well-being for residents and the value of the outdoors.</p>	<p>Supporting text has been included that references the value of open space for well-being.</p>
	<p>The measure of the number of dwellings and the associated provision of open space seems inconsistent with GBC's reference to major applications being 10 or more houses. This is out of sync and needs clarity</p>	<p>We assume this is a comment regarding major applications being defined as 10 or more houses while the thresholds for on-site provision of open space refer to 11 or more houses.</p> <p>The definition of major development (10 dwellings or more) is defined in the NPPF, however the threshold for on-site provision of Amenity/Natural Green Space has been set at 11 or more dwellings as schemes below this size are considered to be generally too small to provide an on-site contribution in most cases.</p>
	<p>Opportunities to provide open space should also be seen as an opportunity to reinforce local character and landscape settings e.g. increased provision could offset smaller garden provision.</p>	<p>The plan includes policies that govern character and design.</p>

	The importance of open space needs to be highlighted with reference to mental health and well being needs, and the growing importance of community space should be acknowledged.	The supporting text has been amended to include these references.
	There is no mention of Local Green Spaces. These are not included in P2 so need to be covered within this section of Policies.	There is no need for a policy protecting Local Green Spaces as these areas benefit from protection through the NPPF and also usually through Neighbourhood Plan policies that have equal weight to a local plan policy. LGS should not be treated the same as Open Space as the latter can be lost subject to tests in the NPPF and the former should not be. Additionally, Open Space can be moved (re-provided elsewhere) whereas LGS is tied to a specific boundary.
Ockham Parish Council		
6.23	We do not support financial contribution as an alternative to providing Open Space in new developments (6.23) particularly in light of the advice in 6.21 which states that every ward in the borough has an identified shortage of at least one typography of open space. The provision of Open Space should be mandatory as part of any new development.	It will not always be practical to provide open spaces on site and it would not be reasonable to refuse permission for all developments that do not include open space. Therefore, it is necessary to collect a financial contribution from developments that do not provide open space to make sure that provision keeps up with need and, ideally, helps to correct existing deficits.
Sport England		
	Sport England does not support the use of standards as demands from new development might not be best met through new pitch provision. Once the authority has a robust PPS evidence base in place, Sport England can offer the Playing Pitch Calculator tool to help the authority to plan positively for sport. The calculator uses key data from the Councils up-to-date PPS to estimate what the additional demand generated from specific housing developments for the different pitch sport types is likely to be. Any increase in demand should be informed by the PPS to direct where capacity should be created i.e. improvements to existing sites within the locality or new provision	This comment appears to relate to the provision of playing pitches only. The Council intends to produce a Playing Pitch Strategy which will supplement the Open Space, Sport and Recreation Assessment 2017 (OSSRA). The OSSRA sets out a need for 1.35ha of parks and recreation grounds space per 1000 people. This includes an allowance for playing pitches. Once the PPS is in place it will be used to inform the proportion of parks and

	supported by appropriate infrastructure. Please note that the Playing Pitch Calculator cannot be used to estimate demand for developments where there is either no PPS in place or it is out of date.	recreation grounds space that will be used for pitches. In the meantime the proportion will be established on a case-by-case basis.
Taylor Wimpey		
	TW object to this policy on the basis that the policy should give adequate weight to relevant SPDs and Policy D1 in the Local Plan (2019). As per Paragraph 35 of the NPPF (2019), the DMP must be consistent with National Policy.	Our view is that ID6 is consistent with national policy. SPDs are guidance for adopted policy and should not govern the development of new policy (though they may form part of the evidence base for policy development). If an SPD is no longer in conformity with policy following adoption of new policy, the updated policy will take precedence in decision making.
	There is currently a discrepancy between the ID6 proposed standards and those used within Part 3 of the Strategic Development Framework (SDF) SPD. Whilst the proposed ID6 policy standards are set out within Table 5 of the Draft SDF SPD (including the identification of the three tiers of Children's Play) the open space calculations for each strategic site relate back to the Saved 2003 Local Plan Policy R2 Recreational Open Space Provision In Relation To Large New Residential Developments. The latter sets out a simpler open space typology and is open to interpretation as to which of the SDF SPD Table 5 typologies are considered as part of each R2 category. The application of these standards was set out within the 2002 Open Space SPD which is no longer available and therefore there are no given catchments or detail. There is also a discrepancy between the overall provision per person; R2 policy equates to 28m ² per person whilst the proposed ID6 policy is 26.8m ² per person.	The overall quantum of open space that would be provided under the new proposed standards is slightly lower than (but broadly comparable with) the quantum that would be provided under the 2003 standards. Whilst the proposed standards are more detailed and less discretionary in terms of the mix of typologies that will be delivered, the policy allows for deviation from the mix of typologies where this would correct deficits and deviation from the standards where lack of feasibility can be demonstrated. The planning application process provides scope for flexibility. If a proposed residential scheme falls within both the old (2003) and new open space planning policies over its lifetime, then details of provision will be considered as part of pre-application discussion with the developer.
Policy para 3)	ID6 requires further clarification of the detail and catchment distances between the differing types of Children's Play (LAP, LEAP & NEAP) as set out FIT guidance 'Beyond the Six Acre Standard' and Table 5 of the SDF SPD. The outlined 480m catchment is considered appropriate for LEAP provision only. On this basis TW propose the following changes to part 3:	The FiT benchmark standard for LAPs is 100m (2-3 mins walk) and for NEAPs is 1,000m (15 mins walk). However, the OSSRA provided updated evidence to support the proposed new standards which included specific recommendations for child and youth play space based on the need for open spaces of various typologies highlighted in household surveys (NEAPS are included

	<ul style="list-style-type: none"> • <u>Play Space (Children) - 480 meters of 10 mins walk time – only applicable to LEAPS – need alternative provision for LAPS and NEAPS to align line with FIT standards and GBC alternative walking times in particular for strategic sites</u> 	<p>within the youth play space typology and the recommended access provision for this was 720m).</p> <p>The access standards in the policy will be considered in respect of site-specific considerations and we have therefore amended the wording of the heading in Table ID6a for access standards to change 'maximum distance' to 'expected maximum distance'. This will help to clarify that, whilst the quantity standard in this table is a requirement for all sites, there is greater flexibility in relation to access standards in cases where these cannot be met without compromising the layout and design of a scheme.</p>
Policy para 4)	<p>The narrative sets out that there is an 'allowance' for playing pitches within the Parks and Recreation grounds, however a quantum/ percentage of this sub-typology is not given. There is also no set standard for sports provision as currently set within Saved Policy R2. If sports provision is included within this typology (Parks and Recreation) then consideration would need to be given as to the walking distances – the current FIT guidance recommends 1200m whereas Parks and Recreation 720m.</p> <p>Proposed amendment:</p> <p>4) The parks and recreation grounds standard includes an allowance for playing pitches. <u>Playing Pitch provision for strategic sites is set out below.</u> Further detail regarding the need for playing pitches of different types will be set out in the Council's Playing Pitch Strategy.... Contributions towards private sport provision will be acceptable where there is clear public benefit, for example through inclusion of a community access agreement that enables participation by all members of the community. <u>For Strategic Sites the SPD sets a requirement of 1.6ha playing fields per 1000 persons. This provision can be contained within the Parks and Recreation and Amenity Green Space Typologies and should be located within 1200m catchment distances. This may include the consideration of potential dual use and artificial facilities to extend usage and reduce the overall playing field provision within the</u></p>	<p>The Council intends to produce a playing pitch strategy that will help to establish the amount of Parks and Recreation Grounds space that should be playing pitches. In the meantime, the need for playing pitches will be considered on a case by case basis by decision makers based on evidence provided by the applicant and consultation with the Council's Parks and Leisure team and bodies such as Sport England.</p> <p>The proposed additional amendment (for strategic sites) is also not agreed. The Council intends to replace the extant 2003 standard with a locally derived standard in line with the NPPF. Retaining the 2003 standard for strategic sites would not be compliant with the NPPF. Additionally, it is not clear why strategic sites and non-strategic sites should have different quantitative standards when the need for open space on these sites would not be different. If applicants can show that need would be different on these strategic sites, then the planning application process would provide scope for this evidence to be taken into account.</p>

	<u>Parks and Gardens and Amenity Green space typologies affording alternative opportunities for informal fitness and recreation activities.”</u>	
Policy para 4)	ID6 relates back to the Playing Pitch Strategy for guidance which is not yet available. This would need to include clarification with regards to acceptable dual uses of such facilities, for example as SUDS or the potential double counting of artificial pitches to provide quantum.	Noted. The Council will consult on the draft Playing Pitch Strategy when it has been drafted.
Policy para 5)	<p>Within the larger strategic sites there is potential for larger fully facilitated allotments to be provided with a wider catchment distance of 720m, supplemented by smaller local opportunities within the proposed 480m catchment. We suggest that this is incorporated into the policy as follows:</p> <p>3)</p> <ul style="list-style-type: none"> Allotments: 480 meters of 10 mins walk time – <u>additional provision at 720m in Strategic Sites</u> <p>5) New developments are expected to provide an element of community growing space where appropriate. This may be particularly appropriate for denser developments where residents may have limited access to private gardens of their own, where smaller plots and shared growing spaces would be attractive and where maintenance arrangements are put in place to prevent the spaces falling into neglect. <u>Within the larger strategic sites there is potential for larger fully facilitated allotments to be provided with a wider catchment distance - 720m, supplemented by smaller local opportunities within the proposed 480m catchment.</u></p>	<p>We are not aware that there are tiers of allotments and adopting the proposed amendment would require the tiers to be defined so it is clear which allotments have which access standard.</p> <p>All allotments will need to provide parking, water supplies and toilets etc. and will need to meet the OSSRA quality standards. The suggested amendment would seem to imply that smaller local allotments could avoid providing these facilities, resulting in poor quality provision.</p> <p>However, it is acknowledged that, in terms of design and placemaking, allotments may be more appropriately located on the edge of development sites e.g. in order to promote a softer transition from town to country and to reserve space within the development for more appropriate uses, like parks, shops and services. As a result, the walking distance for allotments has been amended to 720m to provide greater flexibility in placement. This wider catchment distance will also ensure that allotments that are provided will be of the desired quality standard and be fully facilitated, which may be achieved more easily where allotments can be more closely grouped together.</p>
Burpham Neighbourhood Forum		
	The names of documents should be written in full rather than using ‘OSSRA’ or other acronyms.	The plan includes a glossary which explains the acronyms and the first use spells out the document name in full.

Policy para. 3)	The new allotments provided as part of the Weyside Urban Village fail these criteria. "The 5-minute walk, also known as the "pedestrian shed" is considered to be the distance people are willing to walk before opting to drive. Based on the average walking speed a five-minute walk is represented by a radius measuring ¼ of a mile or about 400 meters. This rule of thumb is used to calculate public transport catchment areas or to determine access to destinations within neighbourhoods. The pedestrian shed is usually placed around a community centre or a common destination such as a school or a public plaza, where social and commercial activity is focused. In urban planning, the five minute walk sets a scope for collecting both quantitative and qualitative data at a human scale." https://morphocode.com/the-5-minute-walk/	Walking distances have primarily been established through the OSSRA and are based on local surveys and reflect local needs as well as practicality.
Policy para. 4)	Specify that community access agreement will be in the form of a binding legal agreement.	This text has been updated in the Regulation 19 policy to include reference to a requirement for submission of a community use agreement to ensure that any privately owned pitches provided in respect of the policy requirement will be accessible to the public and that any charges for their use will be affordable. The supporting text explains that this will be secured by means of an appropriate planning condition or legal agreement.
Policy para. 6)	The policy should be worded to always keep pace with changes [to occupancy rates].	The policy refers to expected occupancy rates and allows decision makers to consider appropriate sources of evidence.
East Clandon Parish Council		
	The importance of permanently accessible open and green spaces which can be easily accessed locally and on foot, has never been so obvious as in the early days of COVID-19 lockdown. These spaces proved critical for mental and physical well-being, as people took their allowed daily exercise near their homes. The impact of closure of many larger parks and open spaces (and their car parks) highlighted the value of local green space like never before, and we would like to see this aspect better reflected in future policy.	This point is agreed. The policies protect existing open space and the standards for open space in new development aim to increase provision above current levels.

	Open spaces should be seen as an opportunity to reinforce local character and landscape setting as well as being at the heart of the communities they serve.	The plan contains policies that cover design and character.
Other respondents		
Policy para. 2)	<p>The new Open Space standards are serious reductions in the requirements for open space provision compared with 2003 Policy R2. Consequent reduction in amenity for future residents compared with the past. We are building for the future, shouldn't be reducing standards.</p> <ul style="list-style-type: none"> • The 2003 Policy covered all developments of 25 dwellings or more. The new Policy differentiates between types of space and sizes of developments. For example 'Parks and recreation grounds' and 'Play space (youth)' are only required for developments of 250+ dwellings. • The 2003 standard for 'children's play spaces' was 0.8ha per 1,000 people. It is 0.05ha in the new Policy, and that only for developments of 50+ dwellings. • The new Policy also does not include the provision for small developments offered by 2003 Policy R3, which covers developments between 5 and 25 units. 	<p>The NPPF at paragraph 96 states "Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate."</p> <p>The Council produced the OSSRA to meet this requirement. The OSSRA sets out the new standards and explains how they were derived. The proposed standards are higher than current provision and will lead to an increase in open space over current levels per head of population. The total quantum reduction over the 2003 standards is minor, falling from 28m² per person to 26.8m² per person.</p> <p>The current provision of child play space is 0.04ha per 1,000 people, therefore the proposed minimum standard of 0.05ha represents an increase on current provision. The standards for all types of open space in the policy are based on recommendations in the OSSRA to meet the level of demand as shown by resident surveys carried out for this study.</p> <p>The respondent's point that no contribution would be required for children's play space on schemes of below 50 dwellings is incorrect – The new requirements are for on-site provision above the thresholds in the policy, with financial contributions towards offsite provision below these thresholds. The policy wording has been amended slightly to make this clearer.</p>

		<p>The proposed minimum standard for play spaces refers only to play equipment and facilities (e.g. playgrounds and skate parks), and not adjacent open space or buffers. The extant Local Plan 2003 standard for children’s play space included play equipment/facilities and also the open space around them, which is why the minimum provision was set at 0.8ha per 1,000 people. Land around play equipment/facilities is now incorporated into the proposed new minimum standard for amenity and natural green space.</p> <p>The policy requires developments that fall below the thresholds for onsite provision to make a financial contribution towards offsite provision or enhancement of existing open spaces. The policy has also been amended to seek financial contributions in lieu of on-site provision in the case of developments of fewer than 11 dwellings.</p>
Policy paras 2) and 3)	<p>Being prescriptive (as in the tables) is good but it fails to take account of the circumstances arising from an accumulation of developments. A lack of readily accessible play space for children could lead to demand to place it on other local open space that is satisfying another objective such as biodiversity.</p> <p>It would be better to have a means by which a number specified can be overridden (making it a lower threshold – not a higher one) by the council and require such a use to be met within a smaller development. A financial contribution is not much help if the requirement arises locally and cannot be met without compromising an existing use.</p> <p>This would prevent a developer reducing the number of houses by 1 or a small amount in order to avoid a requirement.</p>	<p>The plan includes policies to protect sites that have an important value such as biodiversity or heritage.</p> <p>The NPPF requires the planning system to be plan-led. It would not be appropriate to include a clause that allows the imposition of a lower threshold for provision of open space. However, the planning system provides scope for decision makers to reject schemes that have been artificially subdivided to avoid planning obligations. This is proposed to be clarified further in relation to residential intensification in policy D9.</p>
Policy para. 2) and 3)	<p>Agree with preferred option, but not necessarily with the specified standards. What is the evidence on which the standards are based?</p>	<p>The standards have been established primarily through the Open Space, Sport and Recreation Assessment.</p>
Policy para. 3)	<p>The time to walk to a play space for children seems optimistic would suggest the distance is reduced to 300m</p>	<p>The maximum walking distance for child play space was established through the OSSRA and based on surveys of</p>

	.	local residents. The NPPF requires open space policies to be evidence-based.
Policy para 11)	Remove the words 'if possible'	Our view is that the use of “where possible” is justified in this instance as open spaces are likely to be delivered at a range of scales and smaller spaces are likely to be unable to provide new links in many cases.
	Agree providing views, heritage, and access and sufficient space, not the bare minimum, is provided, as well covenants that protect and maintain said space.	<p>The standards suggested in this policy are minimum standards, and so developments would be expected to deliver these at a minimum, including minimum quantity and access standards. The maintenance of the space will depend on the use and future ownership of the space, therefore it is not feasible for requirements for covenants on protection and maintenance to be included within the policy.</p> <p>Discussions between developers and the Council should therefore take place as early as possible to establish responsibility for future maintenance of open space. For example, given the ongoing costs and work involved in private maintenance, developers may wish to transfer ownership and maintenance of open space to a management company; or to a public body, subject to the Council’s agreement and payment of a contribution towards maintenance costs by the developer. Further details of the Council’s policy for maintenance of open space are in the Council’s Planning Contributions Supplementary Planning Document (SPD).</p> <p>The policy covers open space for recreation purposes only and does not consider views into or out of open spaces, or issues of heritage which are dealt with by other local plan policies.</p>

Policy ID7: Sport, recreation and leisure facilities		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Environment Agency		
	This policy could be developed in conjunction with Green and Blue Infrastructure policies/SPD.	Noted. The plan will be read as a whole and biodiversity policies will apply to sport, recreation and leisure developments. Policy ID7 was omitted in the Regulation 19 consultation document, as its provisions were duplicated in the NPPF and other emerging LPDMP policies.
Highways England		
	We welcome the sustainable mode focus as per NPPF principles for travel associated with public sport, recreation and leisure. The A3 is currently subject to substantial local short trips and by strengthening the local transport network this will support delivering alternative travel options for this use, thereby reducing the demand on the SRN.	Noted.
Other organisations		
Albury Parish Council		
	Policy ID7 has no mention of adequate parking provision for the development or expansion of leisure facilities, adequate road infrastructure or traffic management. While sport and leisure are exceptions in the AONB, associated requirements should be considered.	Policy ID11 sets out parking standards for new developments, whilst LPSS Policy ID3 requires development that would generate significant amount of

		movement to undertake assessment and produce a travel plan. The Plan is intended to be read as a whole.
Burpham Neighbourhood Forum		
	Retained Local Plan 2003 policy R6 is positive as long as wildlife or night skies (lighting) are not disturbed	Policy ID7 would have supported sport, recreation and leisure development in a manner similar to Policy R6. However, it was omitted in the Regulation 19 consultation document, as its provisions were duplicated in the NPPF and other emerging LPDMP policies. Light pollution is adequately covered by Policy D10a: Light Impacts and Dark Skies.
	[Re: Change of use of land for uses such as outdoor sport and recreation and the provision of facilities for outdoor sport and recreation in the Green Belt]. Providing the openness of the Green Belt is not harmed. In particular, flood lighting should be strictly controlled and presumed to be inappropriate.	Impacts on Green Belt openness are governed by the NPPF and Local Plan: strategy and sites Policy P2: Green Belt. Light pollution is adequately covered by Policy D10a: Light Impacts and Dark Skies.
Policy para 3)	Development proposals deemed to have a heavy water use should be subject to rigorous assessment, with planning applications expected to give full details of anticipated water usage and proposed reservoirs.	Policy ID7 was omitted in the Regulation 19 consultation document, as its provisions were duplicated in the NPPF and other emerging LPDMP policies. The part of policy ID7

		<p>that dealt with water usage has been moved to Policy P12: Water Resources and Water Quality.</p> <p>Policy P12 requires non-residential uses with heavy water consumption to include water collection and storage measures (which could include reservoirs) and demonstrate that they would be sufficient to avoid the need for abstraction or use of public water supplies. As a result, planning applications would have to detail the proposed measures and set out anticipated water usage.</p>
Compton Parish Council		
	<p>Agree. Would like to see a clause added, which states: "Large sport, recreation and leisure facilities are expected to be of a scale and mass that is appropriate to the surrounding landscape/built environment."</p>	<p>The plan includes policies that govern character and design. It is not necessary to repeat those provisions in a further policy.</p>
Guildford Residents' Association		
	<p>Agree but are there sufficient safeguards elsewhere in other policies to guard against impacts arising from lighting and noise, for example? If not, they should be included here, specifically to protect the AONB.</p>	<p>Policy D10a: Light Impacts and Dark Skies deals with light pollution's impacts on privacy, amenity and biodiversity whilst Policy D10: Noise impacts deals separately with the impact of noise on sensitive</p>

		receptors, including residents and the natural environment. The plan is read as a whole so it is not necessary to repeat light and noise policy in a further policy.
Guildford Society		
	<p>ID7 weakens policy. The 2003 Plan had the Policies R6, R7, R8, R9 and R10 listed above. The new ID7 is an omnibus and generally more supportive Policy, but the new Policy appears not to have the limitations on floodlighting set out in 2003 Policy R6, the strong limitations on facilities associated with new golf courses set out in R8, the constraints on new noisy sport facilities etc. set out in R9, and on water based recreational facilities set out in R10. The brief new Policy has a weaker omnibus requirement regarding large facilities. The policy should revert to those embodied in the 2003 plan.</p>	<p>Floodlighting is addressed through policy D10a: Light Impacts and Dark Skies. The other provisions of policies R6 to R10 are all covered elsewhere in the NPPF, the LPSS or another proposed policy.</p> <p>The 2003 plan was produced under a different planning system and it has been necessary to revisit policies in order to ensure they comply with the NPPF. Policy ID7 was omitted in the Regulation 19 consultation document, as its provisions were duplicated in the NPPF and other emerging LPDMP policies.</p>
Guildford Vision Group		
	The river and riverside and the potential should be referenced appropriately.	Policy ID7 was omitted in the Regulation 19 consultation document, as its provisions were duplicated in the NPPF and other emerging LPDMP

		<p>policies. The draft policy governed development for sport, recreation and leisure facilities and would have applied had these been brought forward within the vicinity of the riverside . Otherwise, the river and riverside would have been outside the scope of this policy.</p>
<p>Holy Trinity Amenity Group</p>		
	<p>Walking links from the urban residential areas to open countryside space are poor. Commit to improving these.</p>	<p>Paragraph 1) of the policy had required the provision of new footpaths and cycle links where possible. Improving existing walking links between urban areas and the countryside more generally is outside the scope of this policy. Policy ID7 was omitted in the Regulation 19 consultation document, as its provisions were duplicated in the NPPF and other emerging LPDMP policies.</p>
<p>Residents for Guildford and Villages / Guildford Green Belt Group</p>		
	<p>It is noted that policy ID7 will replace a number of retained policies from the Local Plan 2003 which dealt with the following specific areas:</p> <ul style="list-style-type: none"> • R6 – Intensification of recreational use (which deal with improvement to recreational facilities through new floodlighting and all-weather surfaces) • R7 – Built facilities for recreational use (which deals with replacement and extensions to existing recreational buildings within settlements) 	<p>The provisions of policies R6 to R10 are all covered elsewhere in the NPPF, the LPSS or another proposed policy. The 2003 plan was produced under a different planning system and it has been</p>

	<ul style="list-style-type: none"> • R8 – Golf courses (which sets out the design and extent of new golf course developments) • R9 – Noisy sports, adventure games and similar activities • R10 Water based recreational activities. <p>It is of particular concern that the council is seeking to replace these specific, effective and justified policies with a generic policy which seeks to capture all. The preferred option wording shows considerable ambiguity and lack of specific areas by which a large variety of applications would be determined. It is strongly recommended that the council returns to the specific policies as established within the 2003 Local Plan.</p>	<p>necessary to revisit policies in order to ensure they comply with the NPPF.</p> <p>Policy ID7 was omitted in the Regulation 19 consultation document, as its provisions were duplicated in the NPPF and other emerging LPDMP policies. Paragraph (1) has been incorporated into policy ID6. Paragraph (2) was considered to be unnecessary and unjustified, whilst paragraph (3) is already covered by other policies dealing with climate change and water resources.</p>
Ripley Parish Council		
	<p>Support for more localised facilities should be addressed. Too much emphasis is placed on larger scale facilities such as Spectrum to the detriment of our rural village facilities which are often run by volunteers on a shoestring budget. In particular rural and semi-rural communities rely on village facilities such as bowls clubs and cricket clubs but they are rarely offered any financial assistance by GBC or other bodies. Maintenance and improvement of these new or existing facilities is very challenging and is likely to get worse as charitable financial assistance is withdrawn or reduced. Many people are unable to travel to town centre sporting facilities due to physical or financial constraints and so these village options are an invaluable resource which will need some structured financial assistance from the Borough Council.</p> <p>We need to ensure that incoming residents of new developments are encouraged to integrate into existing communities and the use of sport and leisure facilities would offer an excellent opportunity to achieve this aim.</p>	<p>Policy ID7 was omitted in the Regulation 19 consultation document, as its provisions were duplicated in the NPPF and other emerging LPDMP policies. However, the policy had supported development that provides, increases or improves opportunities for public sport, recreation and leisure, including schemes for new, replacement and extensions to existing facilities, regardless of scale.</p> <p>Maintenance of facilities would have been outside the scope of</p>

		<p>this policy. The Council intends to introduce the Community Infrastructure Levy (CIL, subject to national proposals to replace CIL with a different Infrastructure Levy) which will collect funding that could be used to improve local facilities. A portion of the CIL will be passed to parish councils to spend on local priorities. In non-parished areas, the council will agree priorities with local communities.</p> <p>The point about integration is noted and agreed. The plan as a whole aims to deliver integrated communities.</p>
Sport England		
Policy para 1)	<p>Clarity is needed as to the nature of development envisaged which would need to meet point one. For example, would additional changing rooms at a site necessitate enhancements to existing rights of way networks, providing new footpaths and cycle links?</p>	<p>The planning process includes a test of reasonableness and the draft policy stated that link provision enhancement should be provided “where possible”. Provision would only have been required if it is physically possible, as well as justified and proportionate considering the scale of the proposed development and whether it would have any impact on travel.</p>

Policy para 1)	Clarity is needed as to the nature of development envisaged which would need to meet point one. For example, would additional changing rooms at a site necessitate enhancements to existing rights of way networks, providing new footpaths and cycle links?	The planning process includes a test of reasonableness and the draft policy stated that link provision enhancement should be provided "where possible". Provision would only have been required if it is physically possible, as well as justified and proportionate considering the scale of the proposed development and whether it would have any impact on travel.
Other respondents		
Policy para 1)	Remove the words ' where possible'.	Policy ID7 was omitted in the Regulation 19 consultation document, as its provisions were duplicated in the NPPF and other emerging LPDMP policies. Paragraph (1), which includes this wording, has been incorporated into policy ID6. The use of 'where possible' is appropriate in this context as there are likely to be a variety of situations where improvements to facilities or new small-scale facilities cannot provide new footpaths and cycle links.
	The policy lacks wording that prevents harm to the AONB. It should be protected from impacts on views e.g. through inappropriate flood lighting and accompanying masts.	Policy ID7 was omitted in the Regulation 19 consultation document, however protecting

	<p>The AONB is a recreational resource and new recreation facilities should not harm other recreational opportunities.</p> <p>Local Plan 2003: Policy RE5: Outstanding Areas of Natural Beauty (AONB): Policy RE2(2) and Policy RE6 give the policy wordings to deal with the concerns above and are far stronger in protecting the AONB than the Local Plan SS 2019 Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value. The wording in the Local Plan 2003 Policy RE5 should be retained in a Policy Box in the Development Management Plan 2020 for the Surrey Hills AONB and Green Belt.</p> <p>The last sentence in RE5 is especially important and has been much used over the years. It not only protects the natural beauty of the AONB in views, but helps to control the height of buildings when necessary for environmental reasons.</p>	<p>the AONB was beyond its scope and already addressed by Local Plan: Strategy and Sites Policy P1, which superseded Policy RE5.</p> <p>The last sentence of policy RE5 did not afford greater protection to views to and from the AONB than Policy P1 (1), which seeks to ensure that all developments will conserve or enhance the AONB's landscape quality and beauty. This is also explained in paragraph 4.3.5. The height and scale of any proposed new building would be assessed in relation to its potential impact on views of the AONB when considering a planning application.</p>
	<p>If this is to be the single policy then other aspects need to be included such as preventing adverse impact on biodiversity, climate mitigation, landscape, conservation areas, etc.</p>	<p>These issues are covered adequately by other policies. The plan is designed to be read as a whole so it is not necessary to repeat the content of those policies in this policy.</p>
	<p>Policy does not go far enough in terms of restricting built development. For example, underground car parks could be encouraged if they do not disturb water courses and drainage etc. Or if the car parks are open air, they could have canopies with solar panels to make them dual purpose.</p>	<p>Policy ID7 was omitted in the Regulation 19 consultation document, as its provisions were duplicated in the NPPF and other emerging LPDMP policies.</p>

		<p>It would not be possible to require car parks to be placed underground as in the majority of cases this would have a large cost implication.</p> <p>The point about solar canopies is noted and will be supported by other policies where it helps to reduce the carbon emissions from the facility.</p>
	<p>Points 2 and 3 from ID8 could usefully be added to ID7</p>	<p>Policy ID7 is not being included in the Regulation 19 version of the Plan, as its provisions were considered to be duplicated in the NPPF and other emerging LPDMP policies.</p> <p>Since the policy was drafted, paragraph (1) was moved into policy ID6. Paragraph (2) was considered to be unnecessary and unjustified whilst paragraph (3) was considered adequately covered by other policies dealing with climate change and water resources.</p>

Policy ID8: Community Facilities		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Department for Education		
1	<p>The policy implies that community facilities will only be supported in urban areas and villages. The DfE propose removing this geographical requirement as it leaves ambiguity, and is not in in the spirit of the requirements of the NPPF.</p> <p>Given the constraints over land in GBC, it may not always be possible to locate schools in the existing urban area or villages, and better alternatives may be identified. Furthermore, the requirement for suitable sustainable access means that the locational factors are assessed through this element of the policy.</p> <p>To align with the NPPF (paragraph 94) such that great weight be given to providing school places to meet needs and wider choice in education the following are proposed amendments:</p> <p>1) Supports permission for community facilities within urban areas and villages provided that:</p> <p>a) they are appropriate in design terms</p> <p>b) there are no unacceptable transport impacts, <u>which are not capable of being mitigated</u>;</p>	<p>Agreed. In drafting the Reg 19 policy, it is considered that this reference is unnecessary as other policies provide protection against inappropriate development (for instance in the Green Belt under LPSS Policy P2 or Countryside under Policy P3).</p> <p>Further, the locational guidance proposed relating to accessibility is considered appropriate and positively worded in line with the NPPF.</p> <p>Additional wording as proposed regarding transport impacts is not considered necessary as effective and acceptable mitigation would be intended to avoid unacceptable transport impacts, so this inclusion would appear redundant. Furthermore, transport impacts will be assessed for acceptability in terms of the relevant Local Plan policies including LPSS Policy ID3: Sustainable transport for new developments and ID11: Parking Standards.</p>
3	<p>There should be more flexibility in terms of marketing requirements.</p> <p>Should community facilities no longer be required/fit for purpose, an 18-month marketing requirement is extremely onerous, given the nature of the types of community spaces.</p>	<p>The proposed policy seeks to avoid a degradation of services to communities, whilst allowing more flexible use of land in appropriate circumstances.</p> <p>Given the wide range of the different types of community facilities and public / private service providers, it is considered that the scope to successfully demonstrate that a facility is not</p>

	<p>The DfE would consider that clauses a), b) and c) should be 'either/or' options, rather than additional complementary requirements. This will allow more flexible use of land for community purposes in the right locations and maximise value for money for the public/third sector as the typical owners of such community use sites and buildings.</p>	<p>needed and its retention for community uses has been fully explored, whilst being robust, should be more flexible and appropriate to the particular circumstances. This is referenced in the supporting text to the policy.</p> <p>Furthermore, it is acknowledged that in certain instances, such as where there is adequate alternate provision or a suitable replacement facility is to be provided, there would not be a need for additional policy requirements relating to loss to be satisfied. This is reflected by the proposed policy.</p>
Surrey County Council		
2)	<p>SCC support the preferred option for Policy ID8: Community Facilities, to enable the provision of accessible and viable community facilities that are conveniently accessed by public transport, walking and cycling. Support the co-location of facilities and complementary or ancillary uses.</p>	Noted.
3a) and 3b)	<p>SCC is concerned that Policy ID8 could impact upon the commercial value and flexibility of the county council's public estate. In accordance with government policy, the assets of the estate can be used to provide services for local people through sharing and re-using buildings or through their sale to raise capital receipts for reinvestment. The Government's "Estate strategy" also aims to scale back the public estate to reduce operating costs. In the current climate it is not realistic or economic to restrict the use of ex-community facilities, by having extensive marketing timescales. SCC are therefore be opposed to paragraphs 3)a and 3b) of the proposed policy.</p>	<p>The proposed policy seeks to avoid a degradation of services to communities, whilst allowing more flexible use of land in appropriate circumstances.</p> <p>Given the wide range of the different types of community facilities and public / private service providers, it is considered that the scope to successfully demonstrate that a facility is not needed and its retention for community uses has been fully explored, whilst being robust, should be more flexible and appropriate to the particular circumstances. This is referenced in the supporting text to the policy.</p>

		Furthermore, it is acknowledged that in certain instances, such as where there is adequate alternate provision or a suitable replacement facility is to be provided, there would not be a need for additional policy requirements relating to loss to be satisfied. This is reflected by the proposed policy.
Other organisations		
Guildford Residents Association		
3c	Is 3c) strong enough to ensure alternative provision. Does 'made available' mean the same as 'provided' in this context?	The word 'provided' has been used in the proposed policy and is considered to give sufficient clarity.
Guildford Society		
General	<p>The Local plan 2003 CF5 addressed conversion of dwellings to care homes. Should this also be addressed in the DMDPD?</p> <p>Furthermore, neither the 2003 Plan nor the current document include policy to address the conversion of dwellings to HMOs. Should this be addressed in the DPD?</p>	<p>Policy CF5 includes policy criteria to be used when considering conversions of existing generally large dwellings to care homes. It is considered that proposed LP DMP policy H6 sufficiently addresses the need for such criteria and would be applicable in these instances.</p> <p>With regard to HMO conversions, these are addressed in the LPSS at Policy H1(8) and will also be subject to the provisions of proposed policy H6.</p>
Guildford Vision Group		
General	The town centre and its needs would be better addressed as a separate topic. Community facilities in the town centre, given the number of potential developments, will need careful attention.	The policy is considered equally relevant to the town centre as it is to other locations in the borough. The loss of community facilities, for instance, is important to protect against across the borough, including in the town centre where redevelopment pressure may exist.
Residents for Guildford and Villages / Guildford Green Belt Group		
General	It is not considered that the binary approach of GBC in the preferred option for ID8 between proposals for new community	The Local Plan addresses community facilities as per NPPF para 92 across several policies, including policy E6, ID1 and

	<p>facilities including their replacement or expansion and proposals for the loss of community facilities is reflective of the much more nuanced and multi-faceted approach as set out in paragraph 92 of the NPPF. Nor is it considered that the preferred option for policy ID8 represents positive planning from the council as required under part a of paragraph 92 and throughout the NPPF.</p> <p><u>Recommendation</u> As per comments in relation to open space, the projected increase in population in GBC over the coming years will inevitably place increased pressure on existing community facilities. It is therefore considered that GBC should be taking a far more protective stance over the potential loss of such facilities.</p>	<p>site allocations in the LPSS and emerging policies in the LPDMP including ID5, ID6 and ID9. It is considered that together these policies support para 92 and are positively prepared.</p> <p>The proposed policy wording is considered to provide a protective and sufficiently robust stance toward the potential loss of community facilities.</p>
General	<p>The provision of new community facilities alongside the development of new homes forms a vital part of the creation of sustainable communities. Experience in the borough shows that developers do not place enough importance on the provision of community facilities within developments and it is the responsibility of the council to set out the expectations clearly within the DMP for this.</p>	<p>Reference has been made in the supporting / introductory text that Council requires contributions via s106 agreement toward community facilities, such as for new or expanded school provision, from related new development in line with LPSS Policy ID1 and the NPPF.</p> <p>Expectations with regard to community facility provision (including schools, GP surgeries, community halls) to support development included in the LPSS are already identified in the Plan's infrastructure schedule and the Infrastructure Delivery Plan. Policy on provision is already reflected in the site allocation policies (e.g. community uses, services, new local centre) and requirements (e.g. community building, GP surgery, early years provision) for identified strategic sites.</p> <p>Where justified in terms of the statutory tests, contributions to community facility provision including off-site infrastructure is sought, and secured via s106 legal agreements. These contributions may be pooled together toward items of infrastructure to address cumulative impacts.</p>

General	In terms of existing facilities, it is considered that GBC should prepare a strong evidence base, similar to that of the OSSRA for Open Space, to ensure there is an audit of existing community assets across the borough. This would enable a qualitative and quantitative assessment of existing provision to be undertaken with input from local communities and other stakeholders. This evidence base would be a key consideration in determination of any applications for the loss of community facilities.	It is considered that the proposed criteria-based policy provides protection against the loss of existing community facilities. It is not considered that such a wide-ranging study would be required to support the proposed policy.
	Consideration is also required for applications where it is clear that the existing community facility has been deliberately run down or neglected in order to force or justify its redevelopment.	The state of repair of the building (whether deliberately run down or not) is not considered to be justification for its loss. This is reflected in the supporting text, along with a reference to the quality and condition of the building being reflected in its price in relation to any marketing exercise.
	The preferred option in respect of proposals for the loss of community facilities is not considered anywhere near robust enough to protect against the loss of vital community facilities particularly in more rural areas of the borough where these are of vital importance. Any proposal for the loss of a community facility would be accompanied by significant evidence of engagement with, and support from, the community which the facility serves.	The proposed policy wording is considered to provide a protective and sufficiently robust stance toward the potential loss of community facilities. The proposed policy includes a requirement that retention for community use has been fully explored without success prior to considerations around loss. Detail regarding this exploration is addressed in the supporting text, including engagement with public service providers, such as the Parish Council, as relevant. Further consultation will occur as part of the planning application process.
Theatres Trust		
Definitions	It should be made clear that the policy applied to cultural venues such as theatres and music venues.	LPSS policy E6(3) applies to and protects against the loss of existing visitor, leisure and cultural attractions, including arts and entertainment facilities and already protects against their loss. This policy is cross referenced in the definitions section.
3	The policy or its supporting text should make it clear that sites and facilities are marketed at an appropriate rent/sale price consistent with their existing use without development potential and condition, and marketed through appropriate agents and channels.	Agreed. The supporting text reflects that marketing that should reflect evidence in line with Appendix 4 of the LPSS (and the Council's Marketing Requirements SPD to be produced), including reflecting marketing at a reasonable rent/sale price

	This avoids scenarios, which meet literal policy requirements but which are prejudiced in favour of achieving change of use such as marketing through a residential agent outside of the local area and marketing at a value which is unrealistic thus ensuring interest is not forthcoming.	and terms in line with its community use. The text also expands on the means of marketing beyond 'normal channels' to direct engagement with potentially suitable public service providers.
East Clandon Parish Council		
General	<p>The policy should address provision for the development of community facilities at new strategic sites.</p> <p>The policy should address cumulative increases from smaller developments, which may put pressure on existing community services.</p>	<p>Reference has been made in the supporting / introductory text that Council requires contributions via s106 agreement toward community facilities, such as for new or expanded school provision, from related new development in line with LPSS Policy ID1 and the NPPF.</p> <p>Expectations with regard to community facility provision (including schools, GP surgeries, community halls) to support development included in the LPSS are already identified in the Plan's infrastructure schedule and the Infrastructure Delivery Plan. Policy on provision is already reflected in the site allocation policies (e.g. community uses, services, new local centre) and requirements (e.g. community building, GP surgery, early years provision) for identified strategic sites.</p> <p>Where justified in terms of the statutory tests, contributions to community facility provision including off-site infrastructure is sought, and secured via s106 legal agreements. These contributions may be pooled together toward items of infrastructure to address cumulative impacts.</p>
Easy Horsley Parish Council		
General	The policy should address provision for the development of community facilities at new strategic sites. A policy on the provision of local community services should be a requirement for all strategic sites.	Reference has been made in the supporting / introductory text that Council requires contributions via s106 agreement toward community facilities, such as for new or expanded school

	<p>The policy should address cumulative increases from smaller developments, which may put pressure on existing community services.</p>	<p>provision, from related new development in line with LPSS Policy ID1 and the NPPF.</p> <p>Expectations with regard to community facility provision (including schools, GP surgeries, community halls) to support development included in the LPSS are already identified in the Plan's infrastructure schedule and the Infrastructure Delivery Plan. Policy on provision is already reflected in the site allocation policies (e.g. community uses, services, new local centre) and requirements (e.g. community building, GP surgery, early years provision) for identified strategic sites.</p> <p>Where justified in terms of the statutory tests, contributions to community facility provision including off-site infrastructure, is sought, and secured via s106 legal agreements. These contributions may be pooled together toward items of infrastructure to address cumulative impacts.</p>
Ripley Parish Council		
General	<p>The policy should reference s106 (or CIL if adopted) and contributions to adequately fund the maintenance and/or replacement of community buildings.</p> <p>Ripley Village Hall reflects a lack in funding in spite of it being a key infrastructure requirement in the Local Plan.</p>	<p>Reference has been made in the supporting / introductory text that Council requires contributions via s106 agreement toward community facilities from related new development in line with LPSS Policy ID1 and the NPPF. Contributions via s106 legal agreement need to satisfy the statutory tests.</p>
Send Parish Council		
General	<p>People need to be able to walk to a shop or get a local paper otherwise these sites will not be sustainable.</p>	<p>The policy sets expectations regarding the location of community facilities such that they are conveniently accessed by intended users via public transport, walking and cycling. Furthermore, the SDF SPD provides an expectation that the</p>

	<p>Community Facilities must be a requirement of all strategic sites, and housing developments that propose to deliver 500 new homes</p>	<p>strategic sites should be designed as ‘walkable neighbourhoods,’ with homes located within easy and convenient walking and cycling distance of places and facilities that residents need to access on a day to day basis, such as schools, local shops, recreation facilities and employment.</p> <p>Expectations with regard to community facility provision (including schools, GP surgeries, community halls) to support development included in the LPSS are already identified in the Plan’s infrastructure schedule and the Infrastructure Delivery Plan. Policy on provision is already reflected in the site allocation policies (e.g. community uses, services, new local centre) and requirements (e.g. community building, GP surgery, early years provision) for identified strategic sites.</p> <p>Where justified in terms of the statutory tests, contributions to community facility provision including off-site infrastructure, is sought, and secured via s106 legal agreements. These contributions may be pooled together toward items of infrastructure to address cumulative impacts.</p>
<p>West Horsley Parish Council</p>		
<p>General</p>	<p>People need to be able to walk to a shop or get a local paper otherwise these sites will not be sustainable.</p>	<p>The policy sets expectations regarding the location of community facilities such that they are conveniently accessed by intended users via public transport, walking and cycling. Furthermore, the SDF SPD provides an expectation that the strategic sites should be designed as ‘walkable neighbourhoods,’ with homes located within easy and convenient walking and cycling distance of places and facilities that residents need to access on a day to day basis, such as schools, local shops, recreation facilities and employment.</p>

	Community Facilities must be a requirement of all strategic sites, and housing developments that propose to deliver 500 new homes – thresholds for these needs defining.	<p>Expectations with regard to community facility provision (including schools, GP surgeries, community halls) to support development included in the LPSS are already identified in the Plan's infrastructure schedule and the Infrastructure Delivery Plan. Policy on provision is already reflected in the site allocation policies (e.g. community uses, services, new local centre) and requirements (e.g. community building, GP surgery, early years provision) for identified strategic sites.</p> <p>Where justified in terms of the statutory tests, contributions to community facility provision including off-site infrastructure, is sought, and secured via s106 legal agreements. These contributions may be pooled together toward items of infrastructure to address cumulative impacts.</p>
Other respondents		
1)	Add to avoid detrimental impacts on biodiversity and wildlife corridors.	Whilst para 1 of the proposed Policy identifies issues that are considered most pertinent to this sort of development (community facilities can be relatively large and have a lot of visitors so design, transport and amenity are key considerations) this would not mean other policies do not apply. In this regard, it is considered that detail regarding biodiversity impacts is sufficiently addressed by the proposed biodiversity policies in this plan.
3	The policy should be strengthened to avoid the loss of community facilities. Burchatts Farm Barn in Stoke Park has recently been leased off to a private consultancy when it should have been retained for community use	The proposed policy aims to retain community facilities and sets criteria which would need to be met prior to their loss being considered potentially acceptable.
3a	The 2003 Policy CF2 did not include the wording 'offering it for sale or lease', i.e. was more general.	Noted. The proposed policy seeks evidence to justify the loss of community facilities in the circumstances described. It is considered that this form of evidence enables a sufficiently

		wide opportunity to explore the potential for its retention in community facility use.
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DRAFT

Policy ID9: Retention of Public Houses		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		
Policy ID9	Question 36: agree; many (possibly the majority) of public houses are historic and have intrinsic heritage significance which is closely related to their use.	Noted.
Other organisations		
East Clandon Parish Council		
Policy ID9	<p>In smaller villages, where few other facilities exist, pubs provide a crucial role in the cohesiveness and support of the community. The importance of this has only been further highlighted to us in East Clandon during the COVID-19 outbreak, where our local pub provided much need support to villagers through grocery delivery and hot food for collection, at a time when many vulnerable residents struggled to access these elsewhere.</p> <p>Extenuating circumstances exist in cases where local pubs add such value to the community and have been identified as assets of community value – there are opportunities for pubs to expand their services to the community and these should be encouraged.</p>	Noted and we will consider incorporating wording within the introduction to mention these additional services that some pubs have provided to communities during the COVID-19 pandemic. We consider that it is not just pubs that have been nominated as Assets of Community Value that should be protected; rather any pub that cannot be demonstrated not to be of local value and economically viable.
East Horsley Parish Council		
Policy ID9	<p>We agree with the aims and requirements of Policy ID9 as proposed in the Preferred Option with one additional suggestion.</p> <p>Notwithstanding the important role that pubs can play within communities, their rate of closure suggests many are facing</p>	The respondent's suggested wording places the onus onto local communities to demonstrate long term viability of public houses as it would not be in a developer's interest to provide this evidence; this is likely to be ineffective at preventing their continued loss, as local communities may not have enough

	<p>viability issues. For pubs outside of the town centre, the weight of evidence should be towards demonstrating whether a pub can be viable in the long term or not (e.g. either by a developer or the community through an ACV business plan).</p> <p><i>SUGGESTION: Redevelopment or change of use of public houses should only be resisted if a pub can be demonstrated to be viable over the long term.</i></p>	<p>residents interested in taking on an Asset of Community Value and preparing a business plan for it.</p> <p>Many public houses in the borough have been permitted to be redeveloped without the requirement to be assessed against a policy seeking to protect them. We consider an effective policy should require applicants to demonstrate by means of marketing and, in certain cases, public consultation exercises, that a public house would NOT be viable in the long-term.</p>
Guildford Society		
Policy ID9	<p>Policy ID9 is welcome. There could be a similar one for small shops in isolated communities. Should this policy be extended to cover all community facilities?</p>	<p>Policy E9 (point 10) of the LPSS protects isolated retail units that provide for the everyday needs of communities. Other community facilities are covered by separate LPSS or proposed LPDMP policies.</p>
Holy Trinity Amenity Group		
Policy ID9	<p>Proposed additions:</p> <p>Permission will not normally be given for new A4 use in the designated town centre. Support will be given for making local pubs Assets of Community Value.</p>	<p>The suggestion to not allow permission for new public houses (which are now classed as sui generis uses) in the town centre would contradict LPSS Policy E7, paragraph (1), as well as the sequential test for main town centre uses in the NPPF, paragraph 86.</p> <p>Whilst the Council considers and may support nomination of public houses as ACVs, it is not within the Council's Development Management team's remit to assess such applications; support for these therefore cannot form part of a Local Plan policy.</p>
Send Parish Council		
Policy ID9	<p>Reference to Neighbourhood Plans should be made where local pubs add value to the community and have been identified as assets of community value – there are opportunities for pubs to</p>	<p>A reference to the importance of public houses in neighbourhood plans has been added to the introduction alongside the existing wording in relation to assets of</p>

	expand their services to the community and these should be encouraged.	community value. In regard to support for other uses for pubs, not all community uses would require planning permission and therefore some would be beyond the remit of planning policy to support. This includes the temporary changes of use to takeaways which is currently permitted development during the COVID-19 pandemic. In non-pandemic times, a change of use to a hot food takeaway would not necessarily be automatically supported.
West Horsley Parish Council		
Policy ID9	Reference to Neighbourhood Plans should be made where local pubs add value to the community and have been identified as assets of community value – there are opportunities for pubs to expand their services to the community and these should be encouraged.	A reference to the importance of public houses in neighbourhood plans has been added to the introduction alongside the existing wording in relation to assets of community value. In regard to support for other uses for pubs, not all community uses would require planning permission and therefore some would be beyond the remit of planning policy to support. This includes the temporary changes of use to takeaways which is currently permitted development during the COVID-19 pandemic. In non-pandemic times, a change of use to a hot food takeaway would not necessarily be automatically supported.
Other respondents		
Policy ID9	Accepting that viability may be a reasonable condition for retention, local communities should be given an opportunity and support to take over a public house and run it on a basis which may not amount to full commercial viability.	This is an option for local communities to pursue through the process of nominating a public house to be listed as an asset of community value, then if it is later offered for sale, placing a bid to purchase the business from the current owners. The purpose of this DMP policy is rather to protect against loss of public houses that are demonstrated to be fully economically viable (including those that may not be listed as

		an ACV), in order that these buildings may be taken over by new pub business owners rather than being converted to other uses.
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Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Environment Agency		
	This could be developed in conjunction with Green Infrastructure policies/SPD.	Planning applications for development proposals will be determined by the Local Planning Authority with regard to policies related to green infrastructure. As the Plan is read as a whole, cross-referencing policies is not required.
Highways England		
	We are generally supportive of the principles behind Policy ID10 and the modal shift from single occupancy vehicles to more sustainable methods of travel. We request that we are consulted as the plans for the Guildford Borough Cycle Network develop, in particular for any locations in close proximity to Highways England's assets.	Noted.
Surrey County Council		
	The County Council would support the preferred option. Officers from our transport policy team are working with the borough council on this initiative.	Noted.
Other organisations		
East Horsley Parish Council		

	<p>There are significant gaps outside of the urban area. Cycle network provision outside of the urban area needs to be given greater consideration to ensure the safety of cyclists.</p>	<p>The network is comprised of routes assessed by SCC and, for the Guildford urban area, Transport Initiatives/Urban Movement, to be useful to develop a connection. The map is not exhaustive, and consideration will be given to proposals not presently included in the Policies Map.</p> <p>Requirement (2), as drafted for the LPDMP Reg 19 consultation, states <u>“Development proposals are also required to deliver the site-specific requirements for cycle infrastructure as identified in site allocation policies and also any further requirements identified as part of the planning application process.”</u></p>
	<p>This policy should also include provision for improving the safety of cyclists, (e.g. cyclist & driver education and publicity, road surface improvements, etc.)</p>	<p>The policy, as drafted for the LPDMP Reg 19 consultation, refers to network improvements which can be funded, in whole or in part, or delivered by new developments; therefore, some elements are beyond the scope of the policy (cyclist and driver education and publicity). GBC are supportive of Surrey CC’s cycle training, road safety and behaviour change programmes.</p>
<p>The National Trust</p>		
	<p>A full assessment of the impact of required infrastructure associated with defined routes within the Guildford BC routes area should be undertaken, before routes are finalised and agreed. In particular, a balance needs to be struck between delivering the network along routes that cross sensitive landscapes and that may be of ecological or historic significance.</p>	<p>The policy refers to network improvements which can be funded, in whole or in part, or delivered by new developments. Development proposals will be subject to scrutiny through the planning application process and/or further feasibility and design work would be progressed by the Local Highway Authority.</p>
<p>Surrey Hills AONB</p>		
	<p>Lacks proposals for linking with other towns through the AONB.</p>	<p>The policy establishes the principle of a network and as such, the map is not exhaustive and future proposals for further links will be considered and supported if feasible.</p>

	Consideration could be given to introducing support for planning for green nature cycle corridors to connect with the surrounding AONB landscape and neighbouring settlements.	GBC are supportive of all new routes which could be used for connectivity and leisure in principle and it is not felt necessary to include a specific link to those within, or surrounding, the AONB.
Shalford Parish Council		
	There will be a need to ensure that this is always up to date and a living document rather than something set in stone and never reviewed.	We have futureproofed this policy. Requirement (5), as drafted for the LPDMP Reg 19 consultation, states <u>“Development proposals are expected to have regard to updated plans prepared by Guildford Borough Council and/or Surrey County Council which detail local cycling infrastructure improvements, such as a Local Cycling and Walking Infrastructure Plan.”</u>
	GBC does not have a completed and functioning Transport Strategy, which is essential for a Cycle Network Proposal to be feasible, so this is a priority.	<p>The Local Plan: Strategy and Sites (adopted 2019) incorporates the programme of transport schemes contained in the non-statutory Guildford Borough Transport Strategy 2017 (GBC 2017). This covers all modes of surface transport, including cycling.</p> <p>Scheme AM2, in the Local Plan’s Infrastructure Schedule, requires the provision of a comprehensive Guildford borough cycle network. An off-site network in the vicinity of the former Wisley airfield site is required by scheme AM3.</p> <p>Policy ID10, in the Local Plan: Development Management Policies, will complement this, by defining the routes and infrastructure which comprise the cycle network, setting out requirements for the design and delivery of the cycle routes and infrastructure, as well as allowing for regard to be had to updated cycle network plans, for instance a future Local Cycling and Walking Infrastructure Plan.</p>
	It is essential that the southern half of the borough is represented fully in the Transport Strategy and the Guildford Cycle network	The network is comprised of routes assessed by SCC and, for the Guildford urban area, Transport Initiatives/Urban Movement to be useful to develop a connection. The map is not exhaustive and future proposals for further links will be considered and supported if feasible.

		Requirement (2), as drafted for the LPDMP Reg 19 consultation, states <u>“Development proposals are also required to deliver the site-specific requirements for cycle infrastructure as identified in site allocation policies and also any further requirements identified as part of the planning application process.”</u>
Ripley Parish Council		
	Would suggest that the reality of cycle routes in rural and semi-rural areas is somewhat problematic due to width of B roads. In the documents relating to the proposed Garlicks Arch development, it is suggested that a cycle route to Clandon train station for instance would be possible whereas in reality the route may be quite challenging to cycle safely.	Cycling infrastructure can include high quality cycle tracks segregated from motorised and pedestrian traffic, crossings, low traffic neighbourhoods, 20mph speed limits and modal filters, dependant on location. As this is a high-level network, further work will have to be undertaken to inform the design of the routes. In instances where the road network is constrained, off-road routes may be more appropriate.
Guildford Society		
	There also needs to be policies that ensure: That as far as possible cycle lanes are established separating cyclists from traffic--- there are currently too many which are useless, being painted on pavements often with overhanging branches, or in the gutter of poorly maintained roads.	Requirement (4) of the policy, as drafted for the LPDMP Reg 19 consultation, states <u>“Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance.”</u> At this time, this is Local Transport Note 1/20 Cycling Infrastructure Design (DfT, 2020), which aims to realise a higher quality of infrastructure delivery.
	The Town Centre routes need greater definition, cycling around the gyratory in the town Centre is not to be encouraged until proper provision is made.	Transport Initiatives/Urban Movement state that the gyratory is a ‘Hostile environment for people walking and cycling. Lack of sufficient footway width and lack of cycle facilities.’ The Transport Initiatives/Urban Movement proposals for the gyratory are indicative concepts which the consultants recommended be considered in subsequent ‘Broader work on addressing gyratory and the severance caused’ (Transport Initiatives/Urban Movement, 2020: item 14.3 for Route 14).

		<p>The gyratory and wider town centre road network is now being considered in the Guildford Economic Regeneration Programme (GERP), under the auspices of Guildford BC. In addition, a Guildford Town Local Cycling and Walking Infrastructure Plan is to be prepared for Surrey CC from autumn 2021.</p> <p>We have sought to future-proof the policy – as drafted for the Regulation 19 consultation – to allow for the revision or refinement of proposals for the network which might emerge from current or future work. Specifically, at requirement (5): “Development proposals are expected to have regard to updated plans prepared by Guildford Borough Council and/or Surrey County Council which detail local cycling infrastructure improvements, such as a Local Cycling and Walking Infrastructure Plan.”</p>
	<p>In the Town Centre a balance should be established between cyclists needs (routes/parking) and those of pedestrians. It is inevitable that there will be areas in busy parts of the town where there will be interactions with pedestrians which could disturb their peace of mind. Such interaction might inhibit the development of social activities such as outdoor cafés</p>	<p>Requirement (4) of the policy, as drafted for the LPDMP Reg 19 consultation, states <u>“Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance.”</u> Subsequent to the Issues and Options consultation, the Department for Transport released Local Transport Note 1/20 Cycling Infrastructure Design, which aims to realise a higher quality of infrastructure delivery. The standards state that shared use facilities are generally not appropriate.</p>
	<p>We believe that the Historic core of the Town should be defined so that conditions for cyclists may differ from those in the rest of the borough. These could be adjusted as necessary from time to time.</p>	<p>Development proposals will be subject to scrutiny, including any potential conflict with conservation policies, through the planning application process. The design of infrastructure, including materials used, would need to be appropriate to the context.</p>
<p>The Woodland Trust</p>		

	<p>We encourage the integration of tree planting into new walking and cycling routes, to provide shelter and shade and to maximise the potential of these new green corridors for habitat connectivity.</p> <p>Where new transport infrastructure is proposed, we encourage policies that explore its potential for delivery of major tree planting and woodland creation, the construction of wildlife bridges and green corridors and the restoration of damaged ancient woodland.</p>	<p>Agree. This is addressed by Policy D8: Public Realm, as drafted, which states, at requirement (2)(f), that public realm proposals are required to demonstrate that <u>"it maximises opportunities to incorporate soft landscaping including trees, hedges and other planting, appropriate to both the scale of buildings and the space available;"</u></p>
<p>Guildford Vision Group</p>		
	<p>Cycling in the town centre should not be unfettered. Cyclists and pedestrians must be able to coexist safely. Pedestrian needs should come before cycling demands.</p>	<p>Subsequent to the Issues and Options consultation, the Department for Transport released Local Transport Note 1/20 Cycling Infrastructure Design, which aims to realise a higher quality of infrastructure delivery. The standards state that shared use facilities are generally not appropriate.</p>
<p>Cllr Seabrook</p>		
	<p>This policy is a good start but does not go far enough. It should also:</p> <ul style="list-style-type: none"> • Show how the strategic sites are integrated into the network • Consider speed limits • Promote cycle routes between settlements • Specify minimum requirements for cycle lanes, tracks etc 	<ul style="list-style-type: none"> • At this time, it would not be appropriate to map a network through the strategic sites, without the submission of a masterplan. However, the Strategic Development Framework Supplementary Planning Document (2020) provides further information on the connections to and from the strategic sites. • Agree. The definitions section explains that cycling infrastructure can include high quality cycle tracks segregated from motorised and pedestrian traffic, crossings, low traffic neighbourhoods, 20mph speed limits and modal filters, dependant on location. • The inclusion of the SCC map highlights proposed connections between settlements • Design guidance for cycle routes can be obtained at a national level. Subsequent to the Issues and Options consultation, the Department for Transport released Local Transport Note 1/20 Cycling Infrastructure

		Design, which aims to realise a higher quality of infrastructure delivery. Requirement (4) of the policy, as drafted for the LPDMP Reg 19 consultation, states <u>“Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance.”</u>
West Clandon Parish Council		
	Elements of the network outside the urban area appear very sketchy and thin on the ground and in some cases unlikely to be achievable e.g. the apparent cycle way along the railway from Merrow through West Clandon and on to East Horsley.	The network is comprised of routes assessed by SCC or Transport Initiatives to be useful to develop a connection. The map is not exhaustive, and consideration will be given to proposals not presently included in the Policies Map. Requirement (2), as drafted for the LPDMP Reg 19 consultation, states <u>“Development proposals are also required to deliver the site-specific requirements for cycle infrastructure as identified in site allocation policies and also any further requirements identified as part of the planning application process.”</u> In places, further work will have to be undertaken to inform the suitability of the routes for walking and cycling. In instances where the road network is constrained, off-road routes may be more appropriate.
	It is odd that the policy or its preamble or the maps make no reference to the Sustainable Movement Corridor and its cycling role.	Requirement (1) as drafted for the Regulation 19 consultation states <u>“The routes and infrastructure which comprise the Comprehensive Guildford borough Cycle Network including the cycle elements of the Sustainable Movement Corridor, as represented on the Policies Map, will be the basis and starting point for the identification of improvements, primarily for utility cycling, provided and/or funded by new development.”</u>
	Presumably, other policies and documents will impose requirements for cycling provision on developments. It would be helpful and more convincing if reference was made to these.	Requirement (4) as drafted for the Regulation 19 consultation states <u>“Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance.”</u> Further

		information is contained within the Reasoned Justification and key evidence sections in relation to current guidance.
G-BUG (Guildford Bike User Group)		
	<p>G-BUG's aspiration is for segregated cycle lanes along all A-roads connecting Guildford to neighbouring towns and villages.</p>	<p>With the inclusion of SCC's plans, there are aspirations to connect Guildford to neighbouring towns and villages. The Transport Initiatives/Urban Movement report (2020) notes the lack of suitability of the A3100 Old Portsmouth Road and the A25/ A246 Epsom Road connections due to the constraints of the road network here, which will need to be taken into account when designs progress.</p> <p>Outside of the Guildford urban area, the proposed cycle network is based on Surrey CC's Guildford Local Cycling Plan (Surrey County Council, undated circa 2015). Further feasibility and design work will be required.</p> <p>We have sought to future-proof the policy – as drafted for the Regulation 19 consultation – to allow for the revision or refinement of proposals for the network which might emerge from current or future work. Specifically, at requirement (5): “Development proposals are expected to have regard to updated plans prepared by Guildford Borough Council and/or Surrey County Council which detail local cycling infrastructure improvements, such as a Local Cycling and Walking Infrastructure Plan.”</p>
	<p>The network maps given in the consultation document are a useful 'shorthand', but all the measures in the Transport Initiatives/Urban Movement Report should be referenced in the policies, in particular:</p> <ol style="list-style-type: none"> 1. Recognising the priorities defined in the Report, for example providing cyclists with safe routes across the town centre, especially the gyratory 2. Providing sufficient and secure cycle parking (cycle parking is also addressed by Question 38, but the Transport 	<p>A number of the measures within the Transport Initiatives/Urban Movement report are encompassed by the DfT's LTN 1/20, which underpins the policy.</p> <ol style="list-style-type: none"> 1. As the Policy refers to improvements which can be made in line with development proposals, it is not appropriate to develop a priority list as developments will progress at different timescales over the lifetime of the Plan. Any contributions sought by S106 would need to be related to the development. Deciding how

	<p>Initiatives/Urban Movement Feasibility Report provides much more detailed recommendations)</p> <ol style="list-style-type: none"> 3. Meeting best standards for cycle infrastructure 4. Introducing low traffic neighbourhoods with 20mph speed limits, modal filters etc 5. Integration with the proposed town-wide bike share scheme (eg docking stations) 6. Providing wayfinding and signposting 7. Reference to the Guildford Godalming Greenway: for the avoidance of doubt, this must be explicitly included in the network plans. 8. The policy should include developing safe cycling routes to schools 	<p>best to spend monies and what to deliver is part of implementation and not necessary in the plan.</p> <ol style="list-style-type: none"> 2. The Transport Initiatives/Urban Movement report has been used to inform ID11: Parking Standards and further information is available in the Parking SPD. 3. Agree. Requirement (4), as drafted for the LPDMP Reg 19 consultation states <u>“Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance.”</u> Further information is contained within the Reasoned Justification and key evidence sections in relation to current guidance. 4. Agree. The definitions section explains that cycling infrastructure can include high quality cycle tracks segregated from motorised and pedestrian traffic, crossings, low traffic neighbourhoods, 20mph speed limits and modal filters, dependant on location. 5. The bike share project was deferred in 2020. 6. Agree. The Reasoned Justification makes reference to <u>“...integrated, well signed, lit and maintained routes with high quality surfaces, attractive landscape design, comprehensive wayfinding...”</u> 7. The Guildford Godalming Greenway is included in the Policies Map. 8. Agree. Requirement (2), as drafted for the LPDMP Reg 19 consultation states <u>“Development proposals are also required to deliver the site-specific requirements for cycle infrastructure as identified in site allocation policies and also any further requirements identified as part of the planning application process.”</u> This may include provision to schools, where appropriate.
<p>Worplesdon Parish Council</p>		

	<p>Need to add without an adverse impact on the safe operation of the pedestrian and bus networks.</p>	<p>It is considered that any potential conflict with existing links and routes would be designed out through the development management process, in consultation with the appropriate stakeholders.</p>
<p>Effingham Parish Council</p>		
	<p>There should be recognition of the dangers to pedestrians where cycle routes are doubled up with footpaths. At minimum there should be signage and where possible clear indications of the routes to be taken by cyclists and walkers.</p>	<p>The Department for Transport have released Local Transport Note 1/20 Cycling Infrastructure Design. The guidance was used in the development of Policy ID10 and states that shared facilities between pedestrians and cyclists is generally not appropriate. With the installation of dedicated facilities and further segregation, conflict will be reduced.</p>
<p>Holy Trinity Amenity Group</p>		
	<p>We welcome the commitment to improve cycling facilities, but reserve comments on routes until we have studied how they will affect us. A major problem is the absence of a proper cycle route to the station from our area.</p>	<p>The network is comprised of routes assessed by SCC or Transport Initiatives/Urban Movement to be useful to develop a connection.</p> <p>The gyratory and wider town centre road network is now being considered in the Guildford Economic Regeneration Programme (GERP), under the auspices of Guildford BC. In addition, a Guildford Town Local Cycling and Walking Infrastructure Plan is to be prepared for Surrey CC from autumn 2021.</p> <p>We have sought to future-proof the policy – as drafted for the Regulation 19 consultation – to allow for the revision or refinement of proposals for the network which might emerge from current or future work. Specifically, at requirement (5): “Development proposals are expected to have regard to updated plans prepared by Guildford Borough Council and/or Surrey County Council which detail local cycling infrastructure improvements, such as a Local Cycling and Walking Infrastructure Plan.”</p>

	Strongly protest the absence of a similar policy for walking and pedestrians. It is the amenity that is most complained about by our members.	It is considered that walking infrastructure to be delivered by new development is adequately addressed in the NPPF paras 91 and 110 and Local Plan: Strategy and Sites Policies ID3 and D1.
Merrow Residents Association		
	We agree that there needs to be a policy however the preferred option is not actually “an option” but rather a route map to the production of a future policy. The policy is vague, lacking in both detail and commitment to implement. The lack of clarity on ownership of the policy and its implementation needs swift resolution. We suggest GBC should seek to take ownership of cycling policy away from SCC.	Further detail is given within the Reg 19 consultation document. The policy is a spatial one, with the network illustrated in the Policies Map. Whilst this policy is written by GBC, SCC, as the Local Highway Authority, are a key partner in realising this network.
	Para 6.61. We are disappointed that the amalgamation of SCC and GBC proposals are not available as part of this consultation.	The Policies Map within the Reg 19 consultation contains an amalgamation of the SCC and GBC proposals.
	The proposals are limited and offer nothing materially better to cycling in Merrow or its cycle connectivity with, specifically, Guildford Town centre & Station.	The network is comprised of routes assessed by SCC or Transport Initiatives/Urban Movement to be useful to develop a connection. Proposals for Merrow include the advancement of a connection through the neighbourhood, including a number of traffic calming measures, leading to segregated infrastructure on London Road into the town centre. In residential streets, the focus would likely be on cycle-friendly traffic calming measures as opposed to segregated infrastructure, which is more relevant for main arterial routes. However, the map is not exhaustive, and consideration will be given to proposals not presently included in the Policies Map but which arise during the planning application process.
	Policy must prioritise ensuring existing facilities are fit for purpose and safe (maintenance) before creating new routes.	The policy refers to that which can be delivered by new developments. Requirement (3), as drafted for the LPDMP Reg 19 consultation states: <u>The mechanisms for improvements resulting from new development are:</u>

		<p><u>a) constructing or improving cycle routes and infrastructure on land within the applicant's control;</u></p> <p><u>b) providing under licence and/or funding the Local Highway Authority to deliver the cycle routes and infrastructure on the public highway or land in its control.</u></p> <p>The maintenance of routes will fall to SCC as the Highways Authority on adopted roads and will be considered as part of the development management process if routes are not to be adopted.</p>
	Policy needs to consider the provision of secure cycle storage facilities at "end of journey" locations.	This is addressed in Policy ID11: Parking Standards.
Compton Parish Council		
	Strong reservations about some of the routes presented, e.g. the proposed greenway to the west of Guildford follows a steep gradient at the northern end and crosses the A31 at a point where visibility is extremely poor to the west, and where frequent road traffic accidents have occurred. This should be removed. Further south, the proposed route passes through a belt of ancient woodland, which would potentially cause harm to this sensitive natural habitat.	The network is comprised of routes assessed by SCC or Transport Initiatives/Urban Movement to be useful to develop a connection. These are not intended to be precise locations, however they establish the principle that a new connection would be useful to encourage and enable walking and cycling. Development proposals will be subject to scrutiny through the planning application process which would consider the constraints presented by topography, existing infrastructure and ecological and historical designations.
Guildford Residents' Association		
	Needs to be clarity in the policy about what is the definitive 'cycling plan' and 'cycle network', or simply reference to the finalised Policies Map.	The policy is a spatial one, with the Policies Map comprised of a network of routes assessed by SCC or Transport Initiatives/Urban Movement to be useful to develop a connection.
Send Parish Council		
	Clarity required on how the network can serve and enhance new developments.	The policy refers to infrastructure improvements which can be funded, in whole or in part, or delivered by new developments. This may be through infrastructure on land within the

		applicant's control or delivered via the Local Highway Authority on land which they control.
East Clandon Parish Council		
	Green networks/infrastructure are critical to our future. Must be seen as a priority given the recent emphasis on maximising the use of private transport vs public [transport], and increased bike ownership.	Planning applications for development proposals will be determined by the Local Planning Authority with regard to policies related to green infrastructure. As the Plan is read as a whole, cross-referencing policies is not required.
	The policy does not do enough to ensure the general safety of cyclists. Cycle network provision outside of the urban area needs to be given greater consideration to ensure the safety of cyclists.	Requirement (4), as drafted for the LPDMP Reg 19 consultation states <u>"Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance."</u> Outside of the Guildford urban area, the proposed cycle network is based on Surrey CC's Guildford Local Cycling Plan (Surrey County Council, undated circa 2015). Further feasibility and design work will be required. The map is not exhaustive, and consideration will be given to proposals not presently included in the Policies Map which arise during the planning application process.
	The increasing popularity of e-bikes introduces cycling to new audience - the safety considerations of having more, faster, but less experienced cyclists on the roads for longer periods should be given special safety consideration. Do we need different types of cycle routes for different cycling usage?	It is acknowledged that the rise in popularity of ebikes allows cycling to become more accessible to a wider proportion of the population. The policy will ensure latest guidance is followed, at present being Local Transport Note 1/20 Cycling Infrastructure Design. By designing to this standard, facilities will be safe for those new or returning to cycling, with a vision that infrastructure is accessible for those aged '8-80 years old'. Those confident enough may continue to use the main carriageway, as opposed to dedicated infrastructure, where they feel this is safe to do so.
Martin Grant Homes (Barton Willmore LLP)		
	It is not certain if all of identified 'suggested routes' can be achieved without the need for third party land. New developments	It is not the intention of the policy to identify land ownership. Requirement (3), as drafted for the LPDMP Reg 19

	<p>should not be required to deliver new routes which are outside of their land control.</p>	<p>consultation states <u>“The mechanisms for improvements resulting from new development are:</u> <u>a) constructing or improving cycle routes and infrastructure on land within the applicant’s control;</u> <u>b) providing under licence and/or funding the Local Highway Authority to deliver the cycle routes and infrastructure on the public highway or land in its control.”</u></p>
	<p>We suggest that a ‘priority list’ of routes is created, which gives preference to routes which are deliverable and most likely to be effective at creating a modal shift, so that funding towards these routes is prioritised.</p>	<p>As the Policy refers to improvements which can be made in line with development proposals, it would not be appropriate to develop a priority list as developments will progress at different timescales over the lifetime of the Plan. Any contributions sought by S106 would need to be related to the development.</p>
	<p>Pragmatism is required when considering the delivery of new developments where there may be an element of reducing road capacity to deliver cycle schemes</p>	<p>Requirement (4), as drafted for the LPDMP Reg 19 consultation states <u>“Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance.”</u> Currently, this is contained within Local Transport Note 1/20 Cycling Infrastructure Design. In instances where the road network is constrained, off-road routes may be more appropriate.</p>
	<p>Infrastructure for charging e-bikes should be considered in key locations.</p>	<p>This topic has been addressed the Parking SPD.</p>
	<p>Any policy should also make an allowance for the provision of e-scooters, which are currently subject to trials across the UK.</p>	<p>At this time e-scooters remain illegal unless part of a Government trial, therefore it would be premature to reference in policy. However, the Reasoned Justification states that if e-scooters were to be legalised - either privately owned e-scooters or as part of a public hire scheme, or both - it is envisaged that e-scooters would be treated in the same vein as pedal cycles and therefore able to be used on the road or on dedicated cycling infrastructure.</p>

Wornesh Parish Council		
	<p>Surprised that there appears to be no plan to provide better access from the Downs Link to the Guildford network. WPC believes that to really encourage cycling any plans need to be joined up with Waverley BC and SCC.</p>	<p>The network is comprised of routes assessed by SCC or Transport Initiatives/Urban Movement to be useful to develop a connection. The map is not exhaustive and future proposals for further links will be considered and supported if feasible. SCC, as the local Highways Authority, are a key partner in realising this network, who in turn, have influence over the shaping of the network at a county level.</p>
Residents for Guildford and Villages / Guildford Green Belt Group		
	<p>Extremely concerned at the lack of reference to the Sustainable Movement Corridor which forms a central plank of the Local Plan Part 1. Successfully establishing the Sustainable Movement Corridor, and ensuring that future developments within proximity to it provide the necessary linkages to it, is a key element of the delivery of sustainable development in Guildford. It is therefore vital that clear linkage is made between policy ID10 and the Sustainable Movement Corridor in the final wording of the DMP.</p>	<p>Requirement (1) as drafted for the Regulation 19 consultation states <u>"The routes and infrastructure which comprise the Comprehensive Guildford borough Cycle Network including the cycle elements of the Sustainable Movement Corridor, as represented on the Policies Map, will be the basis and starting point for the identification of improvements, primarily for utility cycling, provided and/or funded by new development."</u></p>
West Horsley Parish Council		
	<p>Reference to Neighbourhood Plans should be included where possible cycle ways have been or could be identified.</p>	<p>Neighbourhood Plans (NPs) are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans (LPs). The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with, so replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added. There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.</p>

	Green networks/infrastructure are critical.	These issues are covered in more detail in LPSS Policy ID4: Green and Blue Infrastructure and Development Management Policy ID8: Public Realm.
	Joined up thinking to make the connections work is required.	Surrey CC, as the local Highways Authority, are a key partner in realising this network, who in turn, have influence over the shaping of the network at a county level.
Ockham Parish Council		
	Many rural roads are narrow and therefore not suitable for designated cycle lanes. We suggest that significant further discourse on this matter is taken with Parish Councils acting as consultants and advisors for each parish within the borough. For example, putting a cycle lane on Ockham Road North would not leave room for cars to pass, let alone the tractors and heavy lorries that regularly use the road.	Cycling infrastructure can include high quality cycle tracks segregated from motorised and pedestrian traffic, crossings, low traffic neighbourhoods, 20mph speed limits and modal filters, dependant on location. In instances where the road network is constrained, off-road routes may be more appropriate. Development proposals will be subject to scrutiny by stakeholders through the planning application process.
Other respondents		
	Worry that the inclusion of Surrey CC's plans will cause the network to be watered down into a series of smaller measures such as a few shared use footpaths rather than an effective network that doesn't treat bikes like pedestrians (as Surrey CC has done so far) and isn't afraid to make changes that may be slightly detrimental to cars (giving bikes priority at junctions for example). TfL has good design guidelines but Surrey CC seem to be stuck in the 90s.	The Department for Transport have released Local Transport Note 1/20 Cycling Infrastructure Design. This follows a number of the same principles as TfL's London Cycling Design Standards and states that bikes should be treated as vehicles. Requirement (4), as drafted for the LPDMP Reg 19 consultation, states " <u>Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance.</u> "
	Sceptical as to the policy's realisation. There are huge issues outside of the urban area and "cycle lanes" are often just narrow strips at the side of busy, narrow roads, which don't lead anywhere, just peter out after a while, don't give cyclists priority over traffic exiting and entering the road, and generally do not act as an encouragement to cyclists at all.	Requirement (4), as drafted for the LPDMP Reg 19 consultation, states " <u>Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance.</u> " At present this is the Local Transport Note 1/20 Cycling Infrastructure Design (DfT, 2020) which has raised the standard of cycling infrastructure to be delivered.

	<p>By painting a few lines on busy roads you are not going to achieve a "comprehensive cycling network"; there needs to be a lot of joined-up thinking between different public authorities if this is to be anything more than a pipe dream.</p>	
	<p>The top priority must be safety for all road users. Achieving the network at the same time as introducing the Sustainable Movement Corridor and providing adequate pavement space for pedestrians will be challenging.</p>	<p>Concerns including safety improvements would be addressed during consultation with stakeholders. A number of the cycle routes presented in the Policies Map could form part of the Sustainable Movement Corridor.</p>
	<p>This preferred option seems incomplete ("the policy will require"). Aspects that need to be included are the safety and convenience of pedestrians, adverse impacts on biodiversity, etc. The replacement of green space with hard surfaces should be avoided.</p>	<p>The policy is detailed further in the Reg 19 consultation document. It is considered that any potential conflict with existing links and routes will be designed out through the development management process, in consultation with the appropriate stakeholders.</p>
	<p>There should be an independent cycle/wheelchair system to allow safe access for all ages. Where possible avoid close proximity to traffic and the use of Greenbelt should be allowed where safety is an issue.</p>	<p>The issues raised here, such as accessibility for all users and separation from traffic are addressed in the Department for Transport's Local Transport Note 1/20 Cycling Infrastructure Design, which underpins the draft policy. Requirement (4), as drafted for the LPDMP Reg 19 consultation, states "<u>Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance.</u>"</p>

Policy ID11: Parking Standards		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Highways England		
	<p>One of the biggest opportunities for managing down traffic demand on the SRN is associated with limiting parking spaces at a destination, but this is particularly successful when policies such as this are supported by the delivery of other sustainable transport measures. We note that there are many references to improvements to pedestrian and cycle networks. However, in terms of managing demand on the SRN and reducing single occupancy vehicle trips, we would expect a reference to both existing and planned bus and rail services.</p> <p>We note that the key infrastructure on which the delivery of the Local Plan depends (policies ID1 and ID3) is included within an Infrastructure Schedule as part of the 2017 “Consultation on the targeted Guildford borough Council Proposed Submission Local Plan”. Of most relevance in relation to policy ID3, we previously stated the following that remains applicable at this time:</p> <p>“It is noted that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. As set out in Policy ID1, it is essential that “the delivery of developments may need to be phased to reflect the delivery of infrastructure” and that “if the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused”. We consider this to be essential due to the existing congestion issues and the lack of certainty of any future scheme.”</p>	<p>Policy ID11, as drafted for the LPDMP Reg 19 consultation version, provides for maximum standards for non-residential car parking, in other words limiting the availability of car parking spaces at destinations.</p> <p>Where low-car or car-free development is planned, Policy ID11 refers to the delivery of a coherent package of sustainable transport measures, proportionate in the case of the former to the level of reduction sought. The reasoned justification and introduction further describe how parking standards sit within an integrated land use and transport strategy and refer to the need for modal shift to sustainable modes as a rationale for the standards proposed.</p> <p>The emerging LPDMP is proposed to be the second part of the Local Plan. The Local Plan: Strategy and Sites (LPSS) was adopted in 2019 and comments relating to the LPSS are outside the scope of this document.</p>
Other organisations		

East Horsley Parish Council		
	We are uncertain whether the specific charging requirements set out for Electric Vehicles will continue to be realistic in the face of rapidly changing technologies. It may be more effective simply to have a policy which refers to best industry practise at the time.	We have sought to futureproof the standards. Text in the Reasoned Justification for Policy ID11, as drafted for the LPDMP Reg 19 consultation version states that <u>“EV charging is a developing technology and connection points should be installed in line with the relevant technical requirements and standards at the time of application.”</u>
	Since parts of Guildford borough have adopted Neighbourhood Plans containing policies relating to car parking standards which form part of their Local Development Plan, reference to their applicability would also be appropriate within this policy.	Agree. Requirement (1) of Policy ID11, as drafted for the LPDMP Reg 19 consultation version, states <u>“The parking standards in adopted Neighbourhood Plans, irrespective of when these were adopted, will take precedence over standards set by the Local Planning Authority in the Local Plan and Supplementary Planning Documents, except in relation to strategic sites.”</u>
Shalford Parish Council		
	What strategies are there for introducing further park and ride facilities in the south of the borough to take parking congestion away from railway stations and village centres?	These parking standards relate to the parking provision to be made by new developments. The Infrastructure Delivery Plan, as identified in Policy ID1, from the Local Plan: Strategy and Sites (2019), is a living document. This will be regularly reviewed as further details become available, particularly regarding infrastructure needed to support development later in the plan period.
	This should also have relevance to reducing the number of vehicles entering the centre of Guildford. Reducing parking spaces in particular areas is not a solution in itself.	Maximum and expected parking standards are variously proposed in the policy in order to facilitate various objectives as explained in the policy and its Reasoned Justification.
Ripley Parish Council		

	<p>Recommend that different parking criteria be applicable to different locations, dependant on the location and proximity to the town centre. For instance, it is highly likely that the Garlicks Arch development and the Wisley development will be predominantly car-centric and as such it is essential that GBC impose higher parking standards within these locations. Realistic levels of parking provision must be provided, irrespective of the desire for more climate-friendly modes of transport, as developments can be blighted by cars being parked on pavements, detrimental to the residents and impossible to negotiate for delivery vans.</p>	<p>Further analysis was undertaken using Census data to investigate differences in car availability across the borough. This has led to a composite approach comprising of maximum residential car parking standards in the town centre, suburban areas and strategic sites, and expected standards in rural and village areas. The residential standards reflect local car availability levels and differ by dwelling type and size, whilst being reflective of differences in accessibility to key services and facilities by non-car modes according to location across the borough.</p>
<p>The Guildford Society</p>		
	<p>Policy ID11 gives tables of parking standards broadly similar to those given in Appendix 1 of the 2003 Plan however omissions include standards for open air markets, DIY stores, garden centres and retail parks. Further omissions are residential hostels and old people's homes.</p>	<p>For some land uses which may take a greater variety of forms, it is more appropriate to specify that parking provision will be based on an individual assessment. It is considered this gives greater flexibility to respond to local conditions. Car parking standards for sheltered housing are included in the non-residential standards.</p>
	<p>The standard for doctors', dentists' and veterinary practices is considerably reduced to 1 space per consulting room, with 'remaining spaces on individual assessment'. This is too low.</p>	<p>In Policy ID11, as drafted for the LPDMP Reg 19 consultation version, the standards for doctors, dentists and veterinary practices are now "individual assessment", giving more flexibility based on site specific circumstances.</p>
	<p>Aim 4 and Table 6 set out to define minimum cycle parking standards for new developments across the borough, with denser requirements in town centres. While we support this concept in principle, we believe that, in order to balance the needs of both pedestrians and cyclists, the busy, historic core of Guildford should be identified and may require different arrangements for cyclists from the rest of the borough.</p>	<p>Whilst it is accepted that decisions regarding the allocation or relocation of road space or public realm between pedestrians and cyclists, and indeed cars, buses, delivery vehicles and space for outdoor seating etc, are complex, most particularly in the town centre, ID11 relates to the provision of parking space in new developments. Through the planning application process, potential heritage and conservation matters would be considered, with stakeholders able to comment.</p>

	<p>In Table 6, one space per two students is too low for residential colleges, when it is to be expected that most students will be cyclists.</p>	<p>The cycle parking standards have been revised following updated guidance in Local Transport Note 1/20 Cycling Infrastructure Design. All residential development must now provide a minimum of 1 space per bedroom.</p>
	<p>The 2003 Plan had a section on parking for disabled drivers. There does not appear to be a counterpart in the new Plan.</p>	<p>In Policy ID11, as drafted for the LPDMP Reg 19 consultation version, requirement (5)(c) states <u>“Car parking spaces for disabled drivers will be designed and provided in accordance with the appropriate government guidance.”</u> Further guidance is provided in the Reasoned Justification and the draft Parking Supplementary Planning Document.</p>
	<p>Neither the 2003 Plan or this Plan included policy requiring the provision for car clubs in new residential settlements. This should be considered.</p>	<p>Policy ID3 in the Local Plan: Strategy and Sites (2019) includes, at requirement (5), that “The provision and/or improvement of a car club by a new development will be supported if appropriate.”</p> <p>The Local Plan: Development Management Policies Reg 19 consultation document sets out instances where car clubs would be required. Requirement (4)(b) of the states: <u>“the provision of car-free development must be justified by a coherent package of sustainable transport measures. Evidence will be required to demonstrate... iii. access to a car club for residents and/or users:”</u></p>
<p>Guildford Vision Group</p>		
	<p>There is little if any reference to a vision of how people’s habits might or should change in the way they travel to Guildford town centre and how development should encourage or enforce that. The Parking Standards Topic treats parking on a per-development basis and is not based, for example, on an over-arching policy for much wider pedestrianisation of the town centre and the infrastructure consequences of such a move.</p>	<p>These parking standards relate to the parking required by new developments however the Reg 19 consultation document has provided further opportunity to explain the rationale behind the policy. With the residential car parking standards for urban areas and non-residential car parking standards across the borough set as maximum standards, this provides opportunity to tailor parking provision to potential future trends. Further, the car parking</p>

		standards for Guildford town centre are more restrictive than for other areas of the borough, aiming to ensure sustainable transport measures are prioritised over the private vehicle.
Cllr Seabrook		
	Table 4 - As public transport access outside Guildford town centre is more difficult, there should be a higher provision of parking. Although the standards are stated as a minimum, they are still too low for unallocated parking. Also, the distinction between Guildford town centre and elsewhere is too blunt. There needs to be wider flexibility - or more sub-sets, to accommodate local differences.	Further analysis was undertaken using Census data to investigate differences in car availability across the borough. This has led to a composite approach with the draft policy comprising of maximum residential car parking standards in the town centre, suburban areas and strategic sites, and expected standards in rural and village areas. The residential standards reflect local car availability levels and differ by dwelling type and size, whilst being reflective of differences in accessibility to key services and facilities by non-car modes according to location across the borough. The approach also responds to design issues that are caused by over provision of parking as well as efforts to optimise site capacity. The standards for unallocated parking of 0.2 spaces per dwelling which is now applicable in instances where 50% or more of parking spaces are allocated.
	Table 6 - the number of cycle spaces for homes without a garden or garage are inadequate. There should be at least 2 spaces for 1- & 2-bedroom properties plus 1 per additional bedroom. In addition, the parking for these properties must be secure e.g. lockable shed.	<p>The cycle parking standards are minimum standards however we have amended these, bringing them in line with guidance set in the Department for Transport's Local Transport Note 1/20 Cycle Infrastructure Design (published July 2020). The standards now require a minimum of 1 space per bedroom.</p> <p>The Reasoned Justification and the draft Parking Supplementary Planning Document provides further design guidance in relation to the delivery of secure cycle parking.</p>
G-BUG		

	The option should also specify that cycle parking should be secure and convenient.	Agree. Reference to best practice guidance is made in the Reasoned Justification and further information is provided in the draft Parking Supplementary Planning Document.
	A more radical policy should be adopted to remove car parking bays on busy roads, in order to provide more space for cycleways and reduce the accident risk to cyclists (eg 'car-dooring'). A policy should be added to enable 'Park and Cycle' from Park and Ride sites, by providing bike [storage at Park and Ride locations]	Policy for parking standards focuses on the provision in new development. Requests for changes such as these suggested, can be made to Surrey County Council and the Guildford Joint Committee as they relate to changes to the existing public highways and Guildford's Park and Ride sites. New developments could provide funding for such changes, where these could be demonstrated to be necessary for the delivery for the development.
Albury Parish Council		
	Parking standards has no mention of rural tourism and recreational parking requirements, or the provision of, or contribution to, disabled, electric charging points or upkeep.	'Sui generis' covers all other uses which are not mentioned specifically, and these will be considered on the basis of individual assessments. In Policy ID11, as drafted for the LPDMP Reg 19 consultation version, requirement (5)(c) states " <u>Car parking spaces for disabled drivers will be designed and provided in accordance with the appropriate government guidance.</u> " Further guidance is provided in the Reasoned Justification and the draft Parking Supplementary Planning Document. The provision of EVCP was covered in the Issues, Options and Preferred Options Consultation document. Requirement (2)(d) and (3)(e) set out the policy requirements for the provision of EVCP in the Reg 19 consultation document.
Worplesdon Parish Council		
	It is welcome that visitor parking is included but what about unallocated parking to stop inconsiderate parking on streets.	It is considered that unallocated parking provides for any site user, including visitors. In Policy ID11, as

		<p>drafted for the LPDMP Reg 19 consultation version. The policy states, at (2)(b) and (3)(c), that <u>“the provision of additional unallocated parking, to allow for visitors, deliveries and servicing, at the ratio of 0.2 spaces per dwelling will only be required where 50% or more of the total number of spaces, provided for use by residents themselves, are allocated”</u>. Design decisions regarding the width of the streets and also any lines, signs and parking restrictions can be used to design out opportunities for inconsiderate parking.</p>
	Car parking management plans need to be included.	<p>Parking provision for uses marked “individual assessment” will require their own justification including parking management plans where appropriate. The content of each and need for the plan would be discussed and agreed with the County Highway Authority.</p>
	Car free developments in appropriate places need to be included.	<p>Agree. Requirement (4)(b) states <u>“the provision of car-free development must be justified by a coherent package of sustainable transport measures”</u> This will be applicable for residential and non-residential development on strategic sites and also non-strategic sites in urban areas.</p>
	Table 5 – Land use A2 missing. What about B1 development above 2500sqm? Hotels and residential institution – what about staff parking?	<p>For sui generis and all other uses not specified - such as B1 development over 2500sqm - an individual assessment is proposed. As a result of changes to the Use Class Order, references to Use Classes have been removed in the Reg 19 consultation version.</p> <p>For hotels and residential institutions, the parking standards make allowance for staff parking.</p>
	Table 6 – no differentiation between long term and short-term cycle parking standards.	<p>The cycle parking standards have been amended to bring them in line with guidance set in the Department for Transport’s Local Transport Note 1/20 Cycle Infrastructure Design (published July 2020) which differentiates between short and long stay parking.</p>

	Table 7 – electric vehicle charging spaces need passive spaces as well	Passive provision was included in the standards presented in the Issues, Options and Preferred Options consultation. These standards have been retained in the Reg 19 consultation document.
Burpham Community Association		
	We agree with the principles but Neighbourhood Plan requirements for 4+ bedroom houses to have at least 3 parking spaces must be maintained.	<p>Based on the draft Policy ID11, as drafted for the LPDMP Reg 19 consultation version, the adopted Burpham Neighbourhood Plan parking standards would continue to be applied to new developments in Burpham, except for the strategic site at Gosden Hill Farm. Requirement (1) of Policy ID11 states that <u>“The parking standards in adopted Neighbourhood Plans, irrespective of when these were adopted, will take precedence over standards set by the Local Planning Authority in the Local Plan and Supplementary Planning Documents, except in relation to strategic sites”</u></p> <p>For all other development proposals in areas not covered by a Neighbourhood Plan, the proposed standards set are benchmarked against car availability levels established from Census data. This data reflects differences in accessibility to key services and facilities by non-car modes across the borough according to location and differs by dwelling type and size.</p>
Merrow Residents Association		
	The range of minimum parking allocations (relating to numbers of bedrooms) falls short of the Burpham Neighbourhood provision - which calls for a minimum of three spaces for residential accommodation with 4 or more bedrooms and we recommend this addition to the range.	Requirement (1) of Policy ID11, as drafted for the LPDMP Reg 19 consultation version, states that <u>“The parking standards in adopted Neighbourhood Plans, irrespective of when these were adopted, will take precedence over standards set by the Local Planning Authority in the Local Plan and Supplementary Planning Documents, except in relation to strategic</u>

		<p><u>sites”</u></p> <p>For all other development proposals in areas not covered by a Neighbourhood Plan, the standards set are benchmarked against car availability levels established from Census data. This data reflects differences in accessibility to key services and facilities by non-car modes across the borough according to location and differs by dwelling type and size.</p>
	<p>It is difficult to understand the rationale for setting a maximum parking allowance for town centre residential development - developers are unlikely to allocate in excess of a minimum allowance where space is especially valuable and inadequate allowance is likely to cause even more disruptive “fly parking” than it would outside the centre. It is therefore strongly recommended that the stated levels should be minimum, not maximum.</p>	<p>Maximum parking standards for Guildford town centre are intended to contribute to optimising the density of development in Guildford town centre, given that it is well served by public transport. These standards have been amended following further analysis of car availability recorded by the Census.</p> <p>In certain circumstances, it may be appropriate for a new development to be low-car or car-free. The setting of minimum car parking standards would not allow for this, unless they were set at zero.</p> <p>Existing parking regulations in the town centre are designed to limit fly parking.</p>
	<p>The SCC guidance (maximum standards) does not fit with the wish to keep on-street parking to a minimum in new developments, which is expressed in the Neighbourhood plans for Burpham and Effingham, for example. (The proposed Send plan which is to be examined soon wants to treat the SCC standard as minimum.) So, given that there is going to be a Supplementary Planning Document on parking (at some time), the distinction between the town centre, where the proposal is for maximum standards, and other residential developments having minimum standards makes no sense. We are suggesting a minimum standard for both.</p>	<p>With respect to on-street parking, Point (9) of Policy ID11, as drafted for the LPDMP Reg 19 consultation version states that <u>“In all cases, the transport strategy, including vehicle parking arrangements, for new developments should be such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users.”</u></p> <p>With regard to the residential car parking standards themselves, we have analysed Census data to better understand car availability by dwelling type and size</p>

		<p>across the borough. This results in an approach better suited to the borough's car availability characteristics while seeking to balance a range of objectives, opportunities and constraints which pertain across different areas of the borough. This has led to a composite approach comprising of maximum residential standards in the town centre, suburban areas and strategic sites, and expected standards in rural and village areas.</p> <p>It should also be noted that Point (1) states that <u>"The parking standards in adopted Neighbourhood Plans, irrespective of when these were adopted, will take precedence over standards set by the Local Planning Authority in the Local Plan and Supplementary Planning Documents, except in relation to strategic sites"</u></p>
Compton Parish Council		
	<p>There is no mention within the Policy of underground or multi-story parking provision. Surface car parking should be kept to a minimum. New developments, particularly non-residential developments, should come with a requirement for parking to be underground, or in less visually sensitive areas, multi-story car parks could be built. Compton PC would also like to see building above some of surface car parking across the borough.</p>	<p>We support making efficient use of land, which includes minimising surfacing parking, and supporting principle of underground parking. However, it has a significant impact on development costs, making some developments unviable if it was made a requirement. Guidance on this matter is covered further in the draft Parking Supplementary Planning Document.</p>
	<p>Use of climate change as a lever for councils and developers to underestimate the level of parking required on the basis of modal shift has happened all too often. When assessing plans, councillors must be realistic about car use today, which has in fact increased since Covid-19 and concerns over use of public transport.</p>	<p>Parking policy is part of a complex decision-set with implications for both the density and design quality of development, mode choice decisions and a range of social, environmental and economic outcomes including carbon emissions, both direct and embodied. We have analysed Census data to better understand car availability by dwelling type and size across the borough. This has led to a composite approach comprising of maximum residential</p>

		standards in the town centre, suburban areas and strategic sites, and expected standards in rural and village areas. These standards cater for observed car availability whilst allowing a lower provision to be provided where justifiable.
Guildford Residents' Association		
	How should parking for car clubs be dealt with?	<p>Policy ID3 in the Local Plan: Strategy and Sites (2019) includes, at requirement (5), that “The provision and/or improvement of a car club by a new development will be supported if appropriate.”</p> <p>The Local Plan: Development management Policies Reg 19 consultation document sets out instances where car clubs would be required. Requirement (4)(b) of Policy ID11 in the Regulation 19 consultation document states <u>“the provision of car-free development must be justified by a coherent package of sustainable transport measures. Evidence will be required to demonstrate:…iii. access to a car club for residents and/or users;”</u></p> <p>Further information on the design and implementation of car club parking is covered in the draft Parking Supplementary Planning Document.</p>
	Table 5 dealing with parking for non-residential development includes reference to ‘town centres’ in A3, A4 and A5. Should this refer to the Town Centre, as elsewhere in the document?	This change has been made where necessary.
	Table 6 dealing with cycle parking covers provision for flats/houses without garages or gardens. In such cases, what constitutes a parking space?	This is discussed in further detail in the draft Parking Supplementary Planning Document.
	How will the implications for power supply requirements [for EV] be assessed and managed?	Developers will be expected to liaise with the transmission network operators, National Grid and Scottish & Southern Energy, on these matters.

Send Parish Council		
	<p>Parking spaces in residential areas outside the town centre are not realistic for 3 or more bedrooms, and certainly should be greater for houses with 4 or more bedrooms, with allowance for the increased car usage among young adults.</p>	<p>We have analysed Census data to better understand car availability by dwelling type and size across the borough. The Census data showed the average 3 bed household in rural & village areas of Guildford borough having a car availability level of 1.78 cars, with lower averages in urban areas. This has led to a composite approach comprising of maximum residential car parking standards in the town centre, suburban areas and strategic sites, and expected standards in rural and village areas, benchmarked at local car availability levels. Further, we have set out an approach to ensure the delivery of unallocated (including visitor) spaces which could provide greater flexibility to accommodate the variation in car availability levels between dwellings.</p>
	<p>Public transport in rural villages is not of the standard or frequency of that in the town centre. Aspirational parking provision will not deliver the public transport required to compensate.</p>	<p>The proposed standards set in the Issues, Options and Preferred Options consultation did not set out to deliver the same parking standards for rural villages as the town centre. The composite approach presented in the Reg 19 consultation document and the draft Parking Supplementary Planning Document takes account of this by using expected car parking standards in rural and village areas.</p>
East Clandon Parish Council		
	<p>The Borough's Parking Standards should be in line with SCC.</p>	<p>The standards, as presented in the Reg 19 Plan and the draft Parking Supplementary Planning Document, are based on Surrey CC's standards, tailored to better reflect Guildford's observed car availability levels.</p>
	<p>Parking spaces in residential areas outside the town centre are not realistic for 3 or more bedrooms, and certainly should be greater for houses with 4 or more bedrooms, with allowance for the increase car usage among young adults.</p>	<p>We have analysed Census data to better understand car availability by dwelling type and size across the borough. The Census data showed the average 3 bed household in rural & village areas of Guildford borough having a car availability level of 1.78 cars,</p>

		with lower averages in urban areas. This has led to a composite approach comprising of maximum residential car parking standards in the town centre, suburban areas and strategic sites, and expected standards in rural and village areas, benchmarked at local car availability levels. Further, we have set out an approach to ensure the delivery of unallocated (including visitor) spaces which could provide greater flexibility to accommodate the variation in car availability levels between dwellings.
	Specific charging requirements set out for Electric Vehicles should refer to best industry practise at the time. Completely new technologies may become available, so flexibility for this is also needed, although we realise hard to achieve.	Agree. We have sought to futureproof the standards. Text in the Reasoned Justification states that <u>“EV charging is a developing technology and connection points should be installed in line with the relevant technical requirements and standards at the time of application.”</u>
	Reference to the applicability of Neighbourhood Plans would be appropriate within this policy.	Agree. Requirement (1) of Policy ID11, as drafted for the LPDMP Reg 19 consultation version, states <u>“The parking standards in adopted Neighbourhood Plans, irrespective of when these were adopted, will take precedence over standards set by the Local Planning Authority in the Local Plan and Supplementary Planning Documents, except in relation to strategic sites.”</u>
Home Builders Federation		
	Given that the Government is proposing to include requirements for EVCPs in Building Regulations we do not consider it necessary for them to be included in this policy.	Until or unless there is a national standardised approach, we propose to set out requirements in local planning policy.
	The Government requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space.	The proposal is for one charge point per dwelling which has an allocated parking space (but only requiring the charging point for one space even if the dwelling benefits from more than one space), and so in this regard matches the Government’s consultation

		proposal. Further requirements are set for unallocated parking spaces.
	Where significant electrical capacity reinforcements are needed such as grid upgrades, this will be costly for the developer. The Government consultation outlines that any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.	If this scenario were to come about, the Government's proposals may be a material consideration in the planning application process.
Martin Grant Homes (Barton Willmore LLP)		
	We recommend that the policy includes additional supporting text, which allows new developments to provide parking below the minimum standards where evidence is provided to demonstrate that the proposed provision is sustainable, adequate and will not have a detrimental impact on the local highway network, thus complying with local and national planning policy.	The composite approach as drafted for the Reg 19 consultation document proposes maximum standards for the town centre, suburban areas and strategic sites, based on observed average car availability rates in Guildford borough. Further, Requirement (4) (a) and (b) state <u>"a) the provision of car and motorised vehicle parking at lower than the defined maximum standards must be justified by a coherent package of sustainable transport measures which will be proportionate to the level of reduction sought"</u> and <u>"b) the provision of car-free development must be justified by a coherent package of sustainable transport measures..."</u>
	The preferred option parking standards set out in Table 3 and 4 makes no allowance for the provision of unallocated parking provision for smaller units / apartments. Clarification on unallocated parking should be provided as the standards are developed, particularly as reference to unallocated parking is made within the electric vehicle charging standards (Table 7). Unallocated parking provision provides a more efficient use of space because different users can utilise each space	The policy does not specify if spaces should be allocated or unallocated however Requirement (2)(b)/ (3) (c) in the Reg 19 consultation document states that <u>"the provision of additional unallocated parking, to allow for visitors, deliveries and servicing, at the ratio of 0.2 spaces per dwelling will only be required where 50% or more of the total number of spaces,</u>

	through the course of a day, consequently a lower overall provision should be identified where unallocated parking is provided.	<p><u>provided for use by residents themselves, are allocated;”</u></p> <p>Further rationale for the delivery of unallocated spaces is provided in the Reasoned Justification.</p>
	We recommend that any future policy also takes account of the changing trends in car ownership and use, particularly where developments are planned to be built out over a long time period i.e. 10 years+. The standards should allow for innovative solutions to delivering parking, which could allow for land to be repurposed should parking demand fall in the medium to long term.	The standards, as presented in the Reg 19 consultation document provide flexibility in application. For phased developments, parking standards will reflect the current standards at the time the reserved matters application is submitted. The draft Parking Supplementary Planning Document includes guidance on futureproofing.
	Recommended that the wording of the EVCP requirement is revisited to allow greater flexibility in the way in which EVCPs are designed into a development and how they are managed. In particular, when smaller houses have allocated parking spaces within a parking court not directly adjacent to the dwelling, it is difficult to connect the necessary infrastructure and instead can require charging points managed by a private company, often at a greater expense, which make them less likely to be utilised.	<p>We consider there to be a number of mechanisms which exist to allow EVCPs to be installed and managed in external parking courts. The accessibility of EVCP to all residents is especially necessary given the Government aim to phase out petrol and diesel car sales by 2030. The installation of infrastructure at the point of development is more favourable than the retrofitting of infrastructure.</p> <p>A reduction in the requirement from that in the proposed policy approach would, holding other factors constant, reduce the provision of EV charging and so reduce the contribution to Local Plan strategic objectives specifically 7 and 13.</p>
Reach PLC (Litchfields)		
	The preferred option sets ‘expected’ vehicle parking spaces for non-residential development across the whole of Guildford which could consequently drive up the height of proposals (if parking is internalised) or alternatively become a dominant feature on the site (if parking is external) which is not desirable in some cases e.g. if the site is in a conservation area etc. Such standards also fail to promote the inclusion of sustainable transport initiatives, such as shuttle bus services, travel	Non-residential standards have been amended to maximum standards. These do not explicitly set the amount of car parking to be provided and a case can be made to reduce these standards dependant on location and strength of sustainable transport offering.

	plans and cycle parking facilities which would enable members of staff, guests and visitors to use sustainable/ non car modes of travel.	
Wornesh Parish Council		
	The level of parking provision seemed relatively high e.g. 2 parking spaces per 2-bedroom property outside the town centre. If car use does decline potentially this means a lot of living space is wasted. Similarly, for commercial and other development the proposed policies require significant car parking provision, encouraging everyone to travel by car.	<p>The standards have been revised in the Reg 19 consultation document to include a geographically tapered approach which is benchmarked against local car availability levels. The residential car parking standards are set as maximum standards in the urban area and strategic sites and expected standards in 'rural and village' locations.</p> <p>Non-residential car parking standards have been amended to maximum standards. These do not explicitly set the amount of car parking to be provided and a case can be made to reduce these standards dependant on location and strength of sustainable transport offering.</p>
Residents for Guildford and Villages / Guildford Green Belt Group		
	Do not agree with the wording of the preferred option point 2 which states that the council will: Define one set of minimum car parking standards for new residential development in the rest of Guildford Borough (except Guildford Town Centre)	The standards have been revised to include a geographically tapered approach which is benchmarked against local car availability levels.
	R4GV supports an approach which seeks to reduce reliance on cars in favour of a modal shift to more sustainable forms of transport. However, in many areas of the town centre, reducing the car parking provision on individual sites leads to pressure on parking in other areas which are not covered by Controlled Parking Zones.	Maximum parking standards for Guildford town centre are intended to contribute to optimising the density of development in Guildford town centre, given that it is well served by public transport. The Controlled Parking Zone (CPZ) could also be expanded by the Guildford Joint Committee.
	Outside of the town centre, large houses have been built with inadequate parking for residents and in Guildford the expansion of	The revised standards are benchmarked against local car availability levels whilst the approach to allocated/

	<p>existing houses and HMOs has brought significant pressure on local parking.</p>	<p>unallocated spaces (including visitor parking) is designed to provide further flexibility.</p> <p>The draft Parking Supplementary Planning Document provides further detail in relation to parking provision for HMOs, extensions and conversions as well as design considerations.</p>
	<p>Consideration is also required within the policy to neighbourhood plans which have adopted specific policies for residents and visitors parking. The wording of policy ID11 should be clear that policies within existing Neighbourhood Plans will be upheld in the determination of planning applications within those areas.</p>	<p>Agree. Requirement (1) of Policy ID11, as drafted for the LPDMP Reg 19 consultation version, states <u>“The parking standards in adopted Neighbourhood Plans, irrespective of when these were adopted, will take precedence over standards set by the Local Planning Authority in the Local Plan and Supplementary Planning Documents, except in relation to strategic sites.”</u></p>
	<p>In order to be effective and justified policy ID11 should make explicit reference to the range of parking requirements across the borough. Each application should be based on its own merits with an appropriate evidence base to support any reduction in parking standards.</p> <p>Where a reduction is justified, the policy should also make it clear that a range of mitigation measures will be required to reduce the impact on the existing community as a result of parking pressures. This would include (but is not limited to):</p> <ul style="list-style-type: none"> • Provision of adequate, safe, secure and managed cycle parking. • Provision of car clubs and payment towards ongoing membership for proposed residents (with access available to the wider community) • Provision of electric vehicle charging points for any on-site provision. • Remove ability of residents of new housing developments to apply for parking permits • Expansion of existing Controlled Parking Zones (CPZs) where site is close to areas not currently covered by CPZs 	<p>As discussed, the residential car parking standards provide a geographically tapered approach which takes account of local context. This composite approach addresses a number of the comments made in relation to a proposal with reduced car parking provision. Requirement (4)(a) of Policy ID11, as drafted for the LPDMP Reg 19 consultation version, states: <u>“the provision of car and motorised vehicle parking at lower than the defined maximum standards must be justified by a coherent package of sustainable transport measures which will be proportionate to the level of reduction sought”</u></p> <p>In relation to the final three bullet points:</p> <ul style="list-style-type: none"> • The standards set out requirements for EVCP separately. • Recent car-free residential developments in Guildford town centre have been excluded from the Traffic Regulation Order for the CPZ, with the developer funding the cost of

		<p>amending the Traffic Regulation Order. The result is that residents of these new developments have not been able to obtain parking permits for the CPZ.</p> <ul style="list-style-type: none"> • The CPZ can also be expanded however this LPDMP cannot achieve this. This could be agreed by the Guildford Joint Committee.
	<p>Reference to parking requirements should also be set out within other policies such as those covering residential conversions and extensions to ensure that any increase in dwelling sizes (or numbers through conversion to HMOs) is accompanied by an adequate level of parking provision.</p>	<p>Policy H6 Requirement (1)(c) states that sufficient parking must be available for residential conversions and sub-divisions. The draft Parking Supplementary Planning Document provides further detail in relation to parking provision for HMO's, extensions and conversions.</p>
<p>West Horsley Parish Council</p>		
	<p>It is essential that the Borough's Parking Standards are brought up to date as soon as possible, and that they should be in line with SCC. There is no point in any discrepancy between the two.</p>	<p>A bespoke policy on parking standards has been prepared for Guildford borough and is presented in the Reg 19 consultation. This has taken into account representations on the Issues and Options consultation, local car availability by dwelling type and size across the borough, the latest Government policy, guidance and consultation proposals for planning, cycling infrastructure and electric vehicles, as well as local political priorities.</p> <p>We have had regard to Surrey CC's Vehicular and Cycle Parking Guidance (2018). Surrey CC's parking guidance is non-statutory guidance.</p>
	<p>Parking spaces in residential areas outside the town centre are not realistic for 3 or more bedrooms, and certainly should be increased for houses with 4 or more bedrooms, with allowance for the increase car usage among young adults.</p>	<p>We have analysed Census data to better understand car availability by dwelling type and size across the borough. The Census data showed the average 3 bed household in rural & village areas of Guildford borough having a car availability level of 1.78 cars and 2.48 for 4 or more bedrooms, with lower averages in urban areas. This has led to a composite</p>

		<p>approach comprising of maximum residential car parking standards in the town centre, suburban areas and strategic sites, and expected standards in rural and village areas, benchmarked at local car availability levels. Further, we have set out an approach to ensure the delivery of unallocated (including visitor) spaces which could provide greater flexibility to accommodate the variation in car availability levels between dwellings.</p>
Ockham Parish Council		
	<p>The information contained within Policy ID11 Parking Standards is ambiguous and insufficient for us to respond in full. The preferred policy approach as stated appears to be full of random ideals which do not address the adequacy of public transport provision. Additionally, in light of the ongoing Covid19 pandemic the information is not workable for review let alone future adoption.</p>	<p>The Reg 18 document was an Issues, Options and Preferred Options consultation. The Reg 19 consultation document refines the policy further.</p>
Weyside Urban Village		
	<p>There is another approach which should be considered, providing 'optimal parking standards', that are evidenced based and account for additional considerations such as sustainable initiatives, in order to provide a more flexible approach to managing the balance between over and under provision of vehicle parking across many different settings.</p>	<p>We have analysed Census data to better understand car availability by dwelling type and size across the borough. The approach presented in the Reg 19 document is a 'composite' approach, tailored to local car availability levels where, in urban areas and on the strategic sites, a case can be made to reduce these residential car parking standards dependant on location and strength of sustainable transport offering.</p> <p>Similarly, the approach to the allocation of spaces provides for further flexibility dependent on local circumstances.</p>
	<p>The overall levels of minimum parking proposed are higher than the currently adopted maximum parking standards. These minimum standards proposed are also higher than the maximum numbers advised by Surrey County Council (SCC). We do not believe the</p>	<p>See response above.</p>

	standards are sufficiently evidenced based and are therefore needlessly high.	
	Policy favours unsustainably high levels of parking which will create more congestion and pollution and contradicts the 'Climate Emergency' and the need to shift to sustainable modes.	The revised approach in the Reg 19 document takes on board these comments.
	There is no mention of any car club requirement within the parking standards policy. This should be reflected within the policy requirements, and the inclusion of mandatory car club bays for larger developments considered as a way of reducing car demand.	<p>Policy ID3 in the Local Plan: Strategy and Sites (2019) includes, at point (5), that “The provision and/or improvement of a car club by a new development will be supported if appropriate.”</p> <p>The Local Plan: Development Management Policies Reg 19 consultation document sets out instances where car clubs would be required. Requirement (4)(b) of the Regulation 19 consultation document states <u>“the provision of car-free development must be justified by a coherent package of sustainable transport measures. Evidence will be required to demonstrate: . . .iii. access to a car club for residents and/or users;”</u></p> <p>Further information on the design and implementation of car club parking is covered in the draft Parking Supplementary Planning Document. The Strategic Development Framework Supplementary Planning Document also contains guidance on the provision of car clubs for strategic sites.</p>
	No consideration has been given to tenure or accommodation type. It is clear from car ownership census data for Guildford borough, that affordable housing has markedly lower car ownership levels than privately owned. Flats also have much lower car ownership levels than houses. Therefore, for example, whilst a 2-bed affordable flat in Guildford has a car ownership level of 0.82 cars per dwelling, as recorded in the 2011 census, the current standards would require a minimum of 2 spaces be provided. Factored up over a number of units,	The revised car parking standards set out differing standards for 1- and 2-bedroom flats as well as 1- and 2-bedroom houses following further analysis of car availability in the borough. However, standards for different tenures have not been proposed as tenure can change over time. The standards do allow for a lower provision of car parking to be delivered, if a case can be made for this.

	this is a clear over provision that would create poor quality and underused parking areas.	
Taylor Wimpey (Savills)		
	Object to proposed. Concern that there is no distinction between 2 bed houses and 2 bed flats in the standards. TW request an amendment to the provision of 1 space for 2 bed flats to align with the SCC Guidance.	The revised car parking standards set out differing standards for 1- and 2-bedroom flats as well as 1- and 2-bedroom houses following further analysis of car availability in the borough.
Burpham Neighbourhood Forum		
	The lead given by Neighbourhood Forums should be followed i.e. minimums used, not maxima, which are no longer respected or deemed realistic. The principle of a maximum was removed in 2015 by the Government. It should not be re-imposed.	<p>The National Planning Policy Framework (2021) states that Local Planning Authorities can set local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network, to optimise the density of development in city and town centres and other locations that are well served by public transport.</p> <p>Policy ID11, as drafted for the LPDMP Reg 19 consultation version, gives primacy to parking standards in adopted Neighbourhood Plans, except in relation to the strategic sites. Requirement (1) states <u>“The parking standards in adopted Neighbourhood Plans, irrespective of when these were adopted, will take precedence over standards set by the Local Planning Authority in the Local Plan and Supplementary Planning Documents, except in relation to strategic sites.”</u></p>
	Homes with three or more bedrooms need at least three spaces, plus visitor parking.	We have analysed Census data to better understand car availability by dwelling type and size across the borough. The Census data showed the average 3 bed household in rural & village areas of Guildford borough having a car availability level of 1.78 cars,

		with lower averages in urban areas. This has led to a composite approach comprising of maximum residential car parking standards in the town centre, suburban areas and strategic sites, and expected standards in rural and village areas, benchmarked at local car availability levels. Further, we have set out an approach to ensure the delivery of unallocated (including visitor) spaces which could provide greater flexibility to accommodate the variation in car availability levels between dwellings.
	<p>Table 3 - Residential development within Guildford town centre - Provision of car parking spaces.</p> <p>20% of a car does not exist. This needs rewording to include a rounding up of the 20% to full spaces, throughout the parking tables.</p>	<p>This referred to 20% of total allocated spaces, not 20% of that dwelling's allocated space(s). The proposal for unallocated parking has been amended, for both strategic and non-strategic sites, to state, at Requirement (2)(b) and (3)(c): <u>"the provision of additional unallocated parking, to allow for visitors, deliveries and servicing, at the ratio of 0.2 spaces per dwelling will only be required where 50% or more of the total number of spaces, provided for use by residents themselves, are allocated;"</u></p> <p>The draft Parking Supplementary Planning Document contains further explanation regarding the rounding up or down of provision.</p>
	<p>Table 4 - Food retail (above 1000m²) * - 1 car space per 14m².</p> <p>We have concerns over the practicality of some of the proposed parking calculations. Requirements should be based on the anticipated number of shoppers per year divided by days and hours open and time kerb to kerb.</p>	<p>The non-residential standards are based on those recommended by Surrey CC as the Local Highway Authority. Provision would be considered further as part of the planning application process through the preparation of a transport assessment.</p>
	<p>Exhibition Hall figures need revisited, with consideration of HGVs Trailers and cars during set up.</p>	<p>This would be considered as part of the planning application process through the preparation of a transport assessment.</p>

	<p>Doctor and dentist parking should be reconsidered, including disabled parking.</p>	<p>The standards for doctors and dentists are now “individual assessment”, giving more flexibility based on site specific circumstances.</p> <p>Requirement (5)(c) states <u>“Car parking spaces for disabled drivers will be designed and provided in accordance with the appropriate government guidance.”</u> Further guidance is provided in the Reasoned Justification and the draft Parking Supplementary Planning Document.</p>
<p>Other respondents</p>		
	<ol style="list-style-type: none"> 1. Policy ID11 gives tables of parking standards broadly similar to those given in Appendix 1 of the 2003 Plan however omissions include standards for open air markets, DIY stores, garden centres and retail parks. More spaces are given for restaurants and fewer for cash and carry. 2. Further omissions are residential hostels and old people’s homes. 3. The standard for doctors’, dentists’ and veterinary practices is considerably reduced to 1 space per consulting room, with ‘remaining spaces on individual assessment’. This is too low. 4. One cycle parking space per two students is too low for residential colleges. 5. The 2003 Plan had a section on parking for disabled drivers. I could not find a counterpart in the new Plan. 6. Neither Plan included provision for car clubs in new residential settlements. This should be considered. 	<ol style="list-style-type: none"> 1. For sui generis and all other uses not specified, an individual assessment is proposed. It is considered this gives greater flexibility to respond to local conditions. 2. ‘Old people’s homes’ would be considered under the standards for care homes and nursing homes where a care aspect is provided, or C3 dwellings if the proposal was for retirement style accommodation. As above, for sui generis and all other uses not specified, an individual assessment is proposed. 3. The standards for doctors, dentists and veterinary practices are now “individual assessment”, giving more flexibility based on site specific circumstances. 4. Cycle parking standards are minimum standards and do not, of themselves, limit the amount of cycle parking provided. However, the standards have been brought in line with guidance set in the Department for Transport’s Local Transport Note 1/20 Cycle Infrastructure Design (published July 2020) which proposes

		<p>that all residential developments, except sheltered/ elderly housing or nursing homes, should have 1 space per bedroom.</p> <p>5. Requirement (5)(c) of Policy ID11, as drafted for the LPDMP Reg 19 consultation version states <u>“Car parking spaces for disabled drivers will be designed and provided in accordance with the appropriate government guidance.”</u> Further guidance is provided in the Reasoned Justification and the draft Parking Supplementary Planning Document.</p> <p>6. Policy ID3 in the Local Plan: Strategy and Sites (2019) includes, at point (5), that “The provision and/or improvement of a car club by a new development will be supported if appropriate.” The Local Plan: Development management Policies Reg 19 consultation document sets out instances where car clubs would be required. Requirement (4)(b) states: <u>“the provision of car-free development must be justified by a coherent package of sustainable transport measures. Evidence will be required to demonstrate:…iii. access to a car club for residents and/or users;”</u></p>
	<p>Prefer the alternate option although it depends on the implementation of the preferred policy.</p> <ol style="list-style-type: none"> 1. Minimum parking standards outside the town centre should not be the same for properties in the town 2. Does every 2 bed have to have at least 2 spaces when many will only require 1 (or potentially none) and there may be on street space that can be used for those who require more than one space 3. Minimum spaces will create space wastage where on street parking is available as opposed to an expected number of 	<p>1, 2 & 3. For Policy ID11, as drafted for the LPDMP Reg 19 consultation version, the revised standards include geographically tapered maximum and expected standards for residential parking dependent on location and greater focus on unallocated parking.</p> <p>4. Requirement (1) states <u>“The parking standards in adopted Neighbourhood Plans, irrespective of when these were adopted, will take precedence over standards set by the Local Planning Authority in the Local Plan and Supplementary Planning Documents, except in relation to strategic sites.”</u> This allows for</p>

	<p>spaces however, with flexibility dependent on location and surroundings, it may be more appropriate for anything "excluding Guildford town centre".</p> <p>4. It was said that in the Neighbourhood Plans for Burpham and Effingham there are minimum parking standards, so why set minimums for the entire borough when they can be set at a lower level?</p>	<p>locally-determined policy, whilst allowing for flexibility in application in other areas based on factors such as location and development type.</p>
	<p>More emphasis on underground parking or double layer garaging. Cars are a way of life and restricting ownership does not encourage less use. Parking in new build must respect the right to own cars.</p>	<p>We support making efficient use of land, which includes minimising surfacing parking, and supporting principle of underground parking. However, it has a significant impact on development costs, making some developments unviable if it was made a requirement. Guidance on this matter is covered further in the draft Parking Supplementary Planning Document.</p> <p>The standards respect the right to own cars by benchmarking residential parking standards at observed levels. Alongside this it is important to provide an appropriate level and type of parking whilst protecting highway safety, promoting transport sustainability and a more efficient use of land as well as addressing the climate emergency declaration, net zero targets and promoting healthier lifestyles.</p>
	<p>Do not support preferred option. I would speculate there hasn't been a case of over parking in years; resulting in car parking wars. The only winners in this are the developers who are allowed to cram in more houses instead. Parking areas mean space and could easily be combined as green areas by innovative design.</p>	<p>A bespoke policy on parking standards has been prepared for Guildford borough and is presented in the Reg 19 consultation. This has taken into account representations on the Issues and Options consultation, local car availability by dwelling type and size across the borough, the latest Government policy, guidance and consultation proposals for planning, cycling infrastructure and electric vehicles, as well as local political priorities.</p>

	<p>How should provision be made for car club parking?</p>	<p>Policy ID3 in the Local Plan: Strategy and Sites (2019) includes, at point (5), that “The provision and/or improvement of a car club by a new development will be supported if appropriate.”</p> <p>The Local Plan: Development Management Policies Reg 19 consultation document sets out instances where car clubs would be required. Requirement (4)(b) states: <u>“the provision of car-free development must be justified by a coherent package of sustainable transport measures. Evidence will be required to demonstrate:…iii. access to a car club for residents and/or users;”</u></p>
	<p>An overview of electric charging points would be worth preparing, to understand the implications of their introduction.</p>	<p>This would be beyond the scope of the Local Plan: Development Management Policies. Further information on EVCPs can be found in Surrey CC’s Electric Vehicle Strategy.</p>
	<p>The limits proposed for car parking spaces in Guildford Town Centre would not restrain vehicle parking spaces as per the stated aim of the policy. Allowing 2 car parking spaces for every 2-bedroom house, for example, could see the number of car parking spaces increase, and would represent a less efficient use of land.</p>	<p>The residential car parking standards have been revised, including reduced maximum standards for the town centre based on further analysis of car availability in Guildford borough.</p>
	<p>The requirement for a minimum number of car parking spaces outside of the town centre is in contrast to GBC’s stated aim of maximising the use of sustainable transport and could make meeting biodiversity net gain targets harder.</p>	<p>The residential car parking standards have been revised, including reduced maximum and expected standards outside of the town centre based on further analysis of car availability in Guildford borough.</p>

Additional Comments

In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, representations were invited regarding what the local plan ought to contain. These additional comments are presented as follows:

- Table 1: Representations made by duty to cooperate prescribed bodies
- Table 2: Representations that requested the inclusion of additional policies not proposed within the Regulation 18 version
- Table 3: Representations made by other bodies and individuals

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Table 1: Representations made by duty to cooperate prescribed bodies		
Paragraph	Main Issue Summary	GBC Response
Prescribed Bodies		
Historic England		

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<p>A positive strategy in the terms of NPPF paragraphs 9 and 126 is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.</p> <p>This strategic approach can inform all aspects of the planning system by recognising and reinforcing the historic significance of places, such as Guildford town centre and the many historic villages in the borough. Policies for local housing, retail and transport, for example, may need to be tailored to achieve the positive improvements in the historic environment that the NPPF expects (NPPF, Paragraph 8). Conservation is certainly not a stand-alone exercise satisfied by stand-alone policies that repeat the NPPF objectives, and consequently the local plan should consider the inter-relationship of the objectives for the historic environment with each of the issues of identified as being of local importance in the consultation.</p> <p>The local plan needs to assess whether or not it should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment (NPPF, Paragraph 157). This might include, for example, tall buildings within identified view corridors. A heritage SPD (or heritage strategy) brought forward in line with paragraph 153 of the NPPF can be a useful tool to amplify and elaborate on the delivery of the positive heritage strategy in the Local Plan and some local planning authorities have chosen to support their conservation strategy within the Local Plan using a topic-specific SPD.</p> <p>We welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. However, you will note from the above comments that we do not consider stand-alone policies in themselves to be sufficient. The policies and proposals throughout all sections of the plan should be tested against the potential effects they will have on the historic environment and the significance of heritage assets. This, also, will be a key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF when it is subject to examination.</p>	<p>It is considered that the suite of historic environment policies that the Plan is providing is a comprehensive positive strategy, and goes further than a lot of other Local Authorities' development management heritage policies, having provided detailed policies for each type of designated heritage asset (D17:Listed Buildings, D18:Conservation Areas, D19:Scheduled Monuments and D19a Registered Parks and Gardens) but also a Designated Heritage Asset policy (D16) which addresses the Local Planning Authority's approach to supporting information and harm to significance, a widespread Non-Designated Heritage Asset policy (D20), and specific policy that addresses enabling development relating to heritage assets (D21). It is considered by providing separate individual policies, this brings attention to and reinforces the important role of the historic environment.</p> <p>Complementing these are a number of design policies that have an inter-relationship with the importance of the historic environment, including policies D4: High Quality Design and Respecting Local Distinctiveness, D6: Shopfront Design and Security, D7: Advertisement, Hanging Signs and Illumination and D8: Public Realm.</p> <p>A conscious effort has been made to ensure that there is depth to all of these policies and that they are reinforced by</p>
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	<p style="text-align: center; font-size: 48px; opacity: 0.3; transform: rotate(-30deg);">DRAFT</p>	<p>supporting information that is thorough and comprehensive, providing links and references to a range of guidance documents and other SPD's where necessary. This includes the Guildford Town Centre Views SPD which identifies important views and would shape development proposals within these. Equally, the provision of Policy D11: The River Wey and Godalming Navigations demonstrates that the Local Planning Authority has considered and is looking to amplify and give a more tailored approach to the preservation and enhancement of certain areas where it is deemed necessary.</p> <p>Whilst it is agreed that Heritage SPD's can be important tools to amplify and elaborate on the delivery on a positive heritage strategy, it is considered that in this particular case the efforts taken in providing multiple policies and the comprehensive nature of the supporting text are essentially equivalent to that which would be provide in an SPD, and therefore would be a duplication. Further to this, SPDs are beyond the scope of this policy document and there are opportunities for additional SPDs to be prepared in the future if these are found to be necessary.</p>
Natural England		
	We note that Policy 5: Thames Basin Heaths Special Protection Area TBH policy is missing. However, we are assuming Policy P5 from Plan Part 1 will stand.	That is correct.

	<p>'Permitted development' is mentioned in the policies throughout the Local Plan Part 2. For example, "Some conversions and sub-divisions may benefit from 'permitted development' rights, which enable changes to be made to a property without the need for planning permission. We would advise you include the information within the relevant policies, that Habitats Regulations development is not guaranteed permitted development.</p>	References such as this have been deleted as they are not relevant to the plan.
	<p>We welcome the consideration of natural capital and would like to highlight these extra resources that you may find useful: Natural England recently published the Natural Capital Atlas. As well as providing a baseline against which to measure change, the Natural Capital Atlas can be used to understand which ecosystem services flow from different ecosystem assets across England. The atlas shows where there are both strengths and weaknesses in the quantity and quality of ecosystems. This can inform opportunity mapping of where to enhance existing natural capital and where to target its creation for the provision of multiple benefits.</p>	Noted.
Surrey Nature Partnership		
	No further comments. To the best of our knowledge the plan appears comprehensive.	Noted.
Department for Education		
	<p>Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools.</p> <p>The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 94).</p> <p>DfE welcomes reference within the plan to support the development of appropriate social and community infrastructure at paragraph 6.41. DfE notes that the Local Plan includes site allocations pertaining to school delivery.</p>	Noted.

	<p>Guildford Borough Council (GBC) should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development¹ (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.</p> <p>Please note that there are two routes available for establishing a new school. Firstly, a local authority may seek proposals from new school proposers (academy trusts) to establish a free school, after which the Regional Schools Commissioner will select the successful trust. Under this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and managing the build process. Secondly, school proposers can apply directly to DfE during an application round or 'wave' to set up a free school. The local authority is less involved in this route but may support groups in pre-opening and/or provide a site. Either of these routes can be used to deliver schools on land that has been provided as a developer contribution. DfE has published further general information on opening free schools as well as specifically in relation to opening free schools in garden communities.</p> <p>DfE is looking to secure a site for the delivery of Surrey Maths School and has identified Guildford Town as an ideal location for this, due to regional accessibility and wider economy and skills concentration. We look forward to working with Guildford Borough Council (GBC) officers to achieve this and establish a high-performing educational establishment in the town. Maths schools are small (c.200 pupils) specialist 16-19 sixth forms, aimed to deliver a focussed curriculum to prepare mathematically able students to succeed in maths disciplines at top universities and pursue mathematically intensive careers. Maths school also work with other schools across the region to provide outreach to raise maths attainment and participation.</p>	
	<p>One of the tests of soundness is that a Local Plan is 'effective', meaning the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments.</p> <p>GBC may wish to include a specific policy regarding infrastructure funding, setting out expectations that developer contributions are expected to cover the cost of new school place provision, where the development generates the need for school places. This is established in our guidance, 'Securing developer contributions for education'.</p> <p>The Council should set out education infrastructure requirements for the plan period within an Infrastructure Funding Statement. Where additional need for school places</p>	<p>Reference has been made in the supporting / introductory text that Council requires contributions via s106 agreement toward community facilities, such as for new or expanded school provision, from related new development in line with LPSS Policy ID1 and the NPPF.</p> <p>Expectations with regard to community facility provision (including schools) to</p>

	<p>will be generated by housing growth, the statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. The statement should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used, providing transparency to all stakeholders.</p> <p>Local authorities have sometimes experienced challenges in funding schools via Section 106 planning obligations due to limitations on the pooling of developer contributions for the same item or type of infrastructure. However, the revised CIL Regulations remove this constraint, allowing unlimited pooling of developer contributions from planning obligations and the use of both Section 106 funding and CIL for the same item of infrastructure.</p> <p>We also request a reference within the Local Plan's policies or supporting text to explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. An example of this would be the local authority's expansion of a secondary school to ensure that places are available in time to support development coming forward.</p>	<p>support development included in the Council's adopted Local Plan: strategy and sites are already identified in the Plan's infrastructure schedule and the Infrastructure Delivery Plan. Policy on provision is already reflected in the site allocation policies (e.g. new primary and secondary schools) and requirements for identified strategic sites.</p> <p>Where justified in terms of the statutory tests, contributions to community facility provision including off-site infrastructure, is sought and secured via s106 legal agreements. These contributions may be pooled together toward items of infrastructure to address cumulative impacts.</p> <p>In terms of forward funding and retrospective contributions to infrastructure, the Council's adopted SDF Supplementary Planning document already includes such a reference at para 9.5.7 – 9.5.9.</p>
	<p>DfE would be particularly interested in responding to any update to the Infrastructure Delivery Plan/Infrastructure Funding Statement, viability assessment or other evidence relevant to education which may be used to inform local planning policies and CIL charging schedules. As such, please add DfE to the database for future consultations on relevant plans and proposals.</p>	<p>DfE have been added to our database.</p>
Surrey County Council		
	<p>We are particularly concerned about the need to protect undocumented and as yet undiscovered archaeological remains and we are confused as to the saved status of</p>	<p>Emerging Policy D20 provides policy protection to undesignated sites that may be of archaeological importance. The</p>

	<p>Policy HE11, which seeks to protect this category of heritage assets and we therefore consider it needs to be carried forward and incorporated into this DPD.</p>	<p>policy will be amended to include certain triggers at which an archaeological assessment would be required.</p> <p>Local Plan 2003 Policy HE11 on scheduled ancient monuments was not saved in 2007 however emerging Policy D19 will cover this issue.</p>
	<p>We have additionally made comments related to climate change which reflect the direction of Surrey's Climate Change Strategy: Surrey's Greener Future, recently approved by the county council in May 2020. It is suggested that this document, which reflects the shared ambition of Surrey's 12 local authorities and has benefitted from the input of Guildford Borough Council, might be usefully referred to in the proposed submission version of the DPD or alternatively within the Climate Change SPD. The consultation on the SPD preceded the finalisation of the Climate Change Strategy document. A link to this document can be found here: https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy</p>	<p>This strategy has been referred to in the supporting text for the climate change policies.</p>
<p>Environment Agency</p>		
	<p>We note infrastructure for utilities that need to be strengthened/built for the development has not been included. This should be included to protect the environment and that occupation may need to be phased to ensure the environment is protected until the correct infrastructure is in place.</p>	<p>The Council's adopted Local Plan: strategy and sites addresses infrastructure and delivery under Policy ID1. Its also identifies key infrastructure (including for utilities) on which the delivery of the Plan depends at appendix 6. The issue of phasing and the potential imposition of Grampian conditions is addressed at ID1(3) and para 4.6.6 of the adopted Plan.</p>

Table 2: Representations that requested the inclusion of additional policies not proposed within the Regulation 18 version		
Requested by	Missing policy	GBC response
Surrey County Council	<p>We are particularly concerned about the need to protect undocumented and as yet undiscovered archaeological remains and we are confused as to the saved status of Policy HE11, which seeks to protect this category of heritage assets and we therefore consider it needs to be carried forward and incorporated into this DPD.</p>	<p>Emerging Policy D20 provides policy protection to undesignated sites that may be of archaeological importance. The policy will be amended to include certain triggers at which an archaeological assessment would be required.</p> <p>Local Plan 2003 Policy HE11 on scheduled ancient monuments was not saved in 2007 however emerging Policy D19 will cover this issue.</p>
Gatwick Airport	<p>Aerodrome Safeguarding is a legislative requirement for officially safeguarded aerodromes of which Gatwick Airport is one. Guildford Borough is within Gatwick's 30km wind turbine consultation zone. The current safeguarding zone, covering the height of buildings, structures and cranes and other tall construction equipment and the impact they may have on Instrument Flight Procedures (IFPs), is due to be extended from 15km out to 55km from the Aerodrome Reference Point (ARP) at some point this year (subject to CAA confirmation) and will then cover the whole of Guildford borough.</p> <p>With the above in mind we are requesting that an aerodrome safeguarding policy is included. Only buildings/structures/cranes of certain heights will be of interest. Once we have finalised the new safeguarding map we will supply you with a copy detailing the trigger heights and areas.</p> <p>We request that the following policy and justification be incorporated into the Local Plan: Development Management. A similar policy has been included in Crawley's Local Plan.</p> <p>Explanation:</p>	<p>This appears to be less of a policy and more of awareness raising exercise to ensure that councils consistently apply the safeguarded aerodromes legislation. In any case the extension to the safeguarding zone has not yet been enacted.</p> <p>The supporting text of emerging Policy D15 states that we will consult with Gatwick Airport and NATS on any proposals for wind turbines greater than domestic scale.</p> <p>This appears to be a validation requirement to ensure that all applications that meet certain criteria are consulted upon with the relevant organisation. As a statutory consultee, any comments received back would be used to determine the application.</p>

Aerodrome safeguarding is the process used to ensure the safe and efficient operation of aerodromes. It is in place to help protect aircraft and passengers during take-off and landing and while flying in the vicinity of the aerodrome. This in turn helps ensure the safety of people living and working nearby.

Within the Guildford Borough area aerodrome safeguarding considerations would relate to how a development could impact on flight safety by assessing the height of proposed development or construction equipment that might be used (such as cranes) which could create a potential risk to safe flight operation through impacts on Instrument Flight Procedures (IFPs) out to 55km from the Aerodrome Reference Point (ARP).

Wind turbines within 30km of ARP have the potential to impact on radar utilised by the airport.

Gatwick airport is an EASA certified aerodrome. Therefore, Councils are required to consult Gatwick Airport Ltd on certain planning applications where aerodrome safeguarding applies. The safeguarded area is neither the responsibility nor the proposal of the local planning authority.

Strategic Policy: Aerodrome Safeguarding

Development will only be supported if it is consistent with the continued safe operation of Gatwick Airport.

Where required the Local Planning Authority will consult with the aerodrome operator and/or operator of technical sites (eg radar stations) on relevant proposals in the aerodrome safeguarded area. Statutory consultation responses may require that restrictions are placed on the height of buildings or structures to avoid impacts on the aerodrome including those relating to navigational aids or Instrument Flight Procedures (IFPs).

Proposals that cannot be mitigated to the satisfaction of the statutory consultee are considered to be a hazard to aircraft safety and will be refused.

	<p>Reasoned Justification</p> <p>Aerodrome safeguarding is a legal requirement by way of ICAO (International Civil Aviation Organisation) and EASA (European Aviation Safety Agency) and is embedded in the Town & Country Planning Process by way of ODPM/DfT Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas' Direction 2002. Recently published evidence ('The Planner' magazine 06/09/2018 article by Tabitha Knowles, Associate Director, Lichfields) is suggesting that in general terms, the guidance in Planning Circular 01/2003 is not being applied consistently by Local Planning Authorities and suggest that for clarity, local plans with an officially safeguarded aerodrome should include a policy.</p> <p>Policy Number ??? has been included to raise awareness of the requirements of aerodrome safeguarding and to ensure the safe operation of Gatwick Airport is taken into account in the design of development.</p>	
<p>Guildford Vision Group</p> <p>Residents for Guildford and Villages / Guildford Green Belt Group</p>	<p>Overall, in these issues and preferred options under consultation, there's little if any direct reference to the needs of the town centre, especially in terms of infrastructure, or the possibility of the TCMP agreed by the council in July 2019. The town centre, its health, regeneration and development is sufficiently important as to merit a topic in its own right, with supporting development policies. The latter may emerge from the TCMP initiative but they should not be thwarted by inadequate provision within the current document under consultation. The wider town centre is at the heart of the borough's economy, including heritage, leisure and arts assets. Its successful regeneration deserves more direct attention in these development policies. In GVG's view, the lack of attention springs directly from the rushed production of Policy S3 in the LPSS.</p>	<p>Not clear what policy is missing to address the town centre that is not already covered by the cross cutting policies in the plan. Further discussion has been undertaken with the GER team to confirm that there are no additional policy areas to address within the scope of this plan.</p>

	<p>Policy S3 guides the delivery of development and regeneration within Guildford Town Centre. Para 4.1.22 states “The borough’s town centre will form the key focus for these measures to support and accelerate growth in this sustainable location and maximise the use of previously developed land. This will occur with careful attention to the Local Plan’s design policies, Development Management Policies, the provisions of any possible future Area Action Plan, as well as relevant SPDs including guidance on strategic views into and out of the town centre which will help to guide the appropriate location, form, scale and massing of development.”</p> <p>Despite the significant importance of the town centre in the overall spatial strategy for GBC, there is very little mention of policy S3 throughout the draft DMP. Whilst the policy is referred to indirectly in a number of policies such as the design and density policies there is no specific DMP policy which relates directly to Town Centre Development.</p> <p>Concern that the lack of an effective policy in relation to the Town Centre will lead to a lack of delivery of much needed sustainable housing in the town centre which again would lead to further pressure on unsustainable and unsuitable housing sites to be released at the detriment of existing communities.</p> <p>The lack of effective, justified and positively prepared policies within the GBC development plan has led to the development of a number of inappropriate schemes in Guildford Town Centre, with the Solum Site being the prime example. Without proper policies for the town centre, there is very little that decision makers can do to guide the appropriate design, density, form, function and scale of development and ensure impacts are mitigated where necessary.</p> <p>A specific Town Centre Policy is needed within the next iteration of the DMP which will enable focused delivery of policy S3.</p>	
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<p>West Horsley Parish Council</p>	<p>Need a policy on dog-related development. It is quite apparent that there are a growing number of dog related activities springing up on local green fields and Green Belt land. This is for dog walking and exercising, and brings with it fencing of fields and associated structures/equipment. Whilst being in favour of growing the rural economy, WHPC feels that this aspect needs managing through a specific policy and licensing.</p>	<p>This matter is already addressed by existing Green Belt policy. However some aspects related to dog walking activities do not require planning permission and therefore no policy would be able to prevent this activity from occurring. For those aspects that do require planning permission (e.g. erection of structure) then these will need to be assessed in accordance with Green Belt policy to establish whether they are 'appropriate' uses. If not, then they will be refused unless very special circumstances can be demonstrated. If development that requires planning permission has been erected without planning permission, then this is an enforcement matter.</p>
<p>West Horsley Parish Council</p> <p>Residents for Guildford and Villages / Guildford Green Belt Group</p>	<p>There is no reference to Homeworking which is still a saved 2003 LP Policy E5 – this is significantly more important in the context of Covid-19.</p> <p>The 2003 Local Plan had a specific policy (E5) to address home working. It is unacceptable for the council not to include a more updated policy to cope with modern requirements of home working with new developments given the working pattern changes triggered by the Covid epidemic.</p>	<p>You do not require planning permission to work at home. Applications for outbuildings/ extensions that might facilitate working from home would need to be judged against other policies including Green Belt/design/alterations and extensions policies (rather than a policy on the proposed use of that building). Potential impacts on traffic generation and amenity that would be caused through the development/increased usage of the site is also covered by other policies.</p> <p>LP 2003 E5 supports homeworking proposals so long as amenity issues and traffic generation are addressed. What would a new homeworking policy cover that is not addressed by other</p>

		policies (where planning permission is required)?
<p>West Horsley Parish Council</p> <p>East Clandon Parish Council</p> <p>Residents for Guildford and Villages / Guildford Green Belt Group</p>	<p>Two issues are frequently debated at Planning Committee – infilling, and proportionality/harm to the openness of the Green Belt for extensions to homes in the Green Belt. In contrast to this, villages no longer in the Green Belt are seeing significant extensions to homes which are quite often totally out of keeping with the local character of our village. GBC has an opportunity here to address these by having policies to support and further clarification for Policy P2: Green Belt in the adopted Local Plan (part one). Policy P2 as it exists is open to interpretation and does not provide clear definitions and guidance on these key issues, as well as many others. This does not help Planning Officers who do not have clear guidance to follow.</p> <p>Future SPD for Green Belt is not good enough. There is need for policy now.</p> <p>Policy P2 set out a detailed approach to development in the green belt. Of particular importance was the approach to Extensions or Alterations; Replacement Buildings; and Limited Infilling. There was detailed guidance on what could be considered as ‘limited infilling’ in separate locations across the borough. The DMP policies should provide reference to the part 1 Local Plan policies and further guidance on how such matters are to be considered in the determination of relevant applications.</p>	<p>It is considered the Policy P2 provides sufficient policy context for the decision maker to determine whether a proposal is appropriate in the Green Belt.</p> <p>With regards to infilling, emerging Policy D9 provides additional policy guidance from a design aspect to consider whether proposals are of a sufficiently high quality design.</p> <p>With regards to extensions and replacement buildings, it is not considered desirable to set a percentage figure for what is considered to be ‘proportionate’ or ‘materially larger’. This assessment goes beyond a floorspace/volumetric calculation. It also needs to be considered spatially, with reference to the massing, scale and general visual perception of the proposal. For this reason, it is considered that the flexibility offered by not having a prescriptive percentage enables the decision maker more scope to consider all aspects of the proposal in arriving at their decision.</p> <p>However, there is a commitment to produce a Green Belt SPD will be prepared which will provide additional guidance in relation to Policy P2.</p>

<p>Residents for Guildford and Villages / Guildford Green Belt Group</p>	<p>The final version of the DMP requires the inclusion of a specific policy in light pollution / dark skies in order for the DMP to be effective and consistent with national policy.</p>	<p>The LPDMP does now include a light pollution policy (D10a). The NPPF states that ‘by encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.’</p> <p>Emerging Policy D10a addresses potential light impacts on privacy, amenity and biodiversity.</p> <p>The issue of dark skies and ‘intrinsically dark landscapes’ is currently covered by the AONB Management Plan which LPSS Policy P1 provides a policy hook for. This states that: “In remoter locations, with darker skies, development proposals causing light pollution will be resisted”. To aid clarity and for added emphasis, this policy requirement has been transposed into emerging Policy D10a which has been broadened to cover ‘dark skies’.</p> <p>Furthermore, existing neighbourhood plans provide additional policy against which proposals can be assessed. The supporting text will reference this.</p> <p>In light of the above a borough wide approach seeks to limit the impact of light pollution, including reference to a dark skies element where justified. The policy is now considered to provide sufficient policy hooks to prevent harmful light pollution. This does not prevent</p>
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		NPs from considering the merits of a dark sky policy within their area.
East Clandon PC	Plan should include notifiable installations. Four gas installations are included in the 2003 plan as part of Policy G4.	The legislative requirement for local plans to contain a policy on hazardous materials has been removed. The NPPF requires that Local planning authorities should consult the appropriate bodies when planning, or determining applications, for development around major hazards. This includes major hazard installations and pipelines, licensed explosive sites and nuclear installations.
West Clandon PC	West Clandon is the village most vulnerable to being submerged by the Eastward expansion of Guildford. Sites at Garlick's Arch, Burnt Common and Gosden Hill on land taken from the Green Belt in the latest LPSS are allocated for development. At present there is a "green gap" between the urban area and the village. Are there any management policies that would prevent this "green gap" being closed in the next or future reviews of the LPSS?	This land is already designated Green Belt which is the most restrictive policy.
Holy Trinity Amenity Group	<p>Economy is a big subject that needs more control policies than those given, particularly for the urban area, and for retail activity:</p> <ul style="list-style-type: none"> • Continuing trend to combine small retail units into large ones. • Loss of the end of the upper high street and Epsom Road / London Road triangle as designated shopping streets; these should serve as our "district" shopping centre as we do not have one elsewhere. • Permissible uses in High Street are too restrictive. Policy needs changing to reflect changed needs. • Inactive ground floor frontage – in particular restaurants should have an active frontage. 	<ul style="list-style-type: none"> • If there is no change of use then no planning permission is required to change from a number of small retail units into one large unit • We are not reviewing town centre/district centre boundaries as part of the LPDMP • The use class order has been amended to include a new E class. This brings together a number of previously different use classes so that there is now greater flexibility on the uses between which buildings can change without planning

		<p>permission. Furthermore, some changes of use from E use class to residential can now occur under Permitted Development.</p> <ul style="list-style-type: none"> • LPSS Policies S3 and D1 combined with emerging LPDMP Policy D8 all seek to achieve active ground floor frontages, natural surveillance and lively streets
Residents for Guildford and Villages / Guildford Green Belt Group	The DMP should place a requirement on applications over 5 storeys in height to be accompanied by a comprehensive 'views analysis' (taking into account both landscape and townscape).	<p>To set a trigger at over 5 storeys could be considered to be too prescriptive, arbitrary and gives the impression that anything 5 storeys or less is acceptable in principle which may not be the case. The trigger to undertake views analysis will be dependent upon its context/sensitivity which can vary depending on its location.</p> <p>The supporting text of emerging Policy D4 has been updated to state that views analysis may be required.</p>
M&G	<p>The Friary is one of the main commercial destinations in Guildford town centre. It plays a significant role in underpinning its vitality and viability. The LP provides a series of policies that seek to control the mix of uses within certain areas of the town centre, including the defined Primary Shopping Areas ('PSA') and defined Shopping Frontages ('Primary Shopping Frontage ('PSF') and Secondary Shopping Frontage ('SSF')).</p> <p>The retail evidence base¹ that supported the LP was published in 2015. The Emerging DMP provides an opportunity to for a new policy basis that supports the operation of the town centre and reflect modern commercial requirements.</p>	Changes in legislation in terms of the use class order has provided additional flexibility for former A1 uses to convert to other E uses.

	<p>The role of town centres is evolving. This is a response to changing consumer habits and digital technology, which both create opportunities to attract consumers to town centres, but also reduces the attraction of centres (for example as a result of online shopping). Landlords and operators of town centre property have sought to provide a much wider offer to increase attraction and dwell times within centres. The number of retail requirements for new floorspace has significantly reduced and there are numerous examples of occupiers reducing their store portfolios. Urgent action is required to ensure that town centres can evolve and contribute to the prosperity and well-being of the local areas that they serve. Planning has a significant positive role to ensure a framework is created that facilitates that future vitality and viability.</p> <p>The effects of Policy E7 act as a barrier to achieving the LP's town centre objectives and prevents the Council from providing a positive strategy for the town centre. Policy E7 provides restrictions on changing uses from Class A1 uses within the SSF of the town centre to alternative town centre uses, and provides a complete restriction on the conversion of Class A1 uses within the PSF to alternative town centre uses.</p> <p>A policy should be included within the Emerging DMP that replaces Policy E7 within the LP that better reflect occupational market requirements that operate within town centres. All efforts to promote alternative uses that drive footfall and ensure vitality should be taken in policy.</p>	
<p>Guildford City Football Club</p>	<p>In the first edition, long, long ago space was found for Guildford City Football Club to create a Community Football Ground. In later editions it vanished. Guildford is probably the largest town in the country without a professional football club.</p> <p>We are preparing a plan for the future where we can work closer with businesses in the town. We will never get anywhere without a ground of our own.</p>	<p>A site would need to be proposed that was suitable for this use and deliverable over the lifetime of the plan. No such site has been found/proposed.</p>

Numerous other comments were made to this question covering a broad range of issues, many of which extend beyond the remit of what additional matters the plan ought to contain. In order to aid understanding and provide clarity to those who submitted these, they have been included and responded to in the Interim Consultation Statement so that they can inform the comments made as part of the Regulation 19 consultation. There is significant duplication of comments made within this table however this is considered appropriate in this instance so that individual bodies that responded are able to easily find their comments and our response.

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Table 3: Representations made by other bodies and individuals		
Paragraph	Main Issue Summary	GBC Response
Other organisations		
Taylor Wimpey		
	<p>Guildford Borough Council need to consider the objectives of this plan and crucially what it adds to Local Plan making. At present, the document repeats a lot of National policy and policies in the adopted Local Plan (2019). Development in the borough must be guided by these documents anyway, thus repeating the policies adds no extra weight to these policies and the guidance.</p>	<p>It is considered that where overlap exists that this is justified as the LPDMP provides additional detail.</p>
	<p>GBC has now adopted its Strategic Development Framework Supplementary Planning Document (SDF SPD), which provides site specific guidance for the FWA. This SPD, along with the Strategic Design Code, which is required to be submitted with any planning application for a strategic site, will contain detailed design guidance. The GBC DMP will therefore be less important in the determination of planning applications on strategic sites compared to site specific policies contained in the SPD and Design Code which TW request is noted within the GBC DMP itself.</p>	<p>The LPDMP forms part of the development plan whereas the SDF SPD is guidance only. It is considered that the LPDMP and SDF SPD are complementary.</p>
Merrow Residents' Association		
	<p>We feel that these policies do not give enough prominence to the need to conserve water by harnessing rain water in new developments</p>	<p>This is addressed by emerging policy D12</p>
	<p>We feel that these policies do not give enough prominence to the need to conserve the green spaces in the borough</p>	<p>This is addressed by numerous policies which seek to protect open spaces of value. This includes LPSS Policy ID4 and emerging LPDMP Policies P6/P7, P8/P9, ID5 and ID6.</p>
	<p>Far too little is said about the real potential problem of water supply to the new strategic developments nor to the disposal of sewage from these sites.</p>	<p>This is addressed by Policy ID1 which requires that infrastructure is provided when needed to support development.</p>
	<p>There is no specific policy covering the Green Belt (Policy P2 in the LPSS)</p>	<p>It is not considered necessary to have another policy on Green Belt. A Green</p>

		Belt SPD will however be prepared to provide some additional guidance.
	There is no specific policy covering the AONB	This is addressed by LPSS Policy P1
	Some but not all of the commentary is very backward looking, based on existing circumstances, rather than forward-looking and aiming towards a more future proofed and consciously planned end state. This may be great to maintain the status quo, but fails to grasp the issues and opportunities that are demanded by the scale of the Local Plan housing developments. For instance, with the move away from retail sales towards internet sales would it not be sensible to include this as a new policy to explain the parameters within which retail space can become housing space?	Planning policy must be evidence based. Local Plan policies will be monitored and can be reviewed if necessary.
Bridge End Farm		
	The Council's Executive recommended the adoption of the Supplementary Planning Document for the allocated Strategic Sites. The Officers Report concerning this explains that the SPD will provide detailed formal guidance to assist future masterplanning of the strategic sites as required by Policy D1 (13) which in turn will guide the planning applications for the sites. It is critical that the Development Management Plan, makes clear reference to the SPD and recognises that any proposals coming forward must be assessed having regard to the site specific guidance as outlined in the SPD document. It should clearly recognise that the Development Management policies provide a framework at the district scale and as such may not in all instances apply.	The LPDMP forms part of the development plan whereas the SDF SPD is guidance only. It is considered that the LPDMP and SDF SPD are complementary.
	The plan should recognise that in the circumstances where a strategic site may come forward through a number of applications, that the application of policy when relating to matters such as biodiversity gains, open space provision, etc will be assessed with full regard to the part that application plays within the wider approved Masterplan for the whole strategic site.	LPSS Policy D1(15) already states that planning applications must be consistent with approved masterplans.
Guildford Society		
	These policies contribute to the framework for development, which involves the Strategy and Sites policies, and the SPDs. The inter-connections are complex, and many matters are addressed in all three levels of the hierarchy. To help keep track, we suggest that the Topic Papers produced for the LPSS examination, e.g. on Green Belt and Countryside, Transport etc., are regularly updated.	Topic Papers help explain the rationale for policy scope and content. They help inform the examination process. It is not clear what purpose it would have to update topic papers for policies that have now been adopted. They will however be

		prepared for some of the LPDMP policy areas.
Guildford Vision Group		
	Overall, in these issues and preferred options under consultation, there's little if any direct reference to the needs of the town centre, especially in terms of infrastructure, or the possibility of the TCMP agreed by the council in July 2019. The town centre, its health, regeneration and development is sufficiently important as to merit a topic in its own right, with supporting development policies. The latter may emerge from the TCMP initiative but they should not be thwarted by inadequate provision within the current document under consultation. The wider town centre is at the heart of the borough's economy, including heritage, leisure and arts assets. Its successful regeneration deserves more direct attention in these development policies. In GVG's view, the lack of attention springs directly from the rushed production of Policy S3 in the LPSS.	Further discussion has been undertaken with the GER team to confirm that there are no additional policy areas to address within the scope of this plan. The LPSS and this plan provide a comprehensive policy framework to promote and direct development whilst seeking to protect the towns heritage and character.
	The town centre boundary is too tightly drawn in the Walnut Tree Close area and should be extended northwards to Ladymead to capture Woodbridge meadows and east to the river. While formal amendment of the LPSS is unlikely, there could be a commitment via a SPD effectively to put the extension on all fours with the formal town centre. Such an extension would allow better management of potential housing sites and associated infrastructure needs in the town centre, especially in the environs of Walnut Tree Close and Woodbridge Meadows.	The town centre boundary has implications for retail and parking policies. It has no impact on the delivery of housing sites and associated infrastructure – there is a presumption in favour of sustainable development within urban areas.
	In GVG's interaction with the public over the town centre, other than more housing, three strands have emerged consistently: <ul style="list-style-type: none"> • Support for wider pedestrianisation • Opening up the riverside • Tackling the gyratory and congestion. These are linked, especially the first and second. There is little if any reference to a vision of how people's habits might or should change in the way they travel to Guildford town centre and how development should encourage or enforce that. The Parking Standards Topic treats parking on a per-development basis and is not based, for example, on an over-arching policy for much wider pedestrianisation of the town centre and the infrastructure consequences of such a move, which of necessity would mean tackling the gyratory issue, including its impact on safety and pollution.	Emerging Policy D11 seeks to open up the river in the town centre. There are also existing and emerging policies on public realm, parking, the role of active travel and air quality.
Effingham Parish Council		

	There is a need for a clear statement about the place of Neighbourhood Plans (NPs) in the Guildford Development Management Policies as part of the overall development plan in the introductory sections on page 7.	There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.
West Horsley Parish Council		
	Where there is no guidance through the NPPF, GBC could be more demanding of developers to retain the character of our Borough.	This is addressed through the various design policies.
	With all these policy proposals there needs to be reference to Neighbourhood Plans.	<p>NPs are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with. So replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added.</p> <p>There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.</p>
	There appear clear guidelines for Housing in Urban Areas and there are polices covering development in the Green Belt and Countryside. But there is no clear policy for Housing in Rural Areas that has been removed from the Green Belt. This aspect needs to be considered. It is important that we do not lose the thrust and specification of the policies in the saved Local Plan 2003 which currently provides clear guidance that leaves little open to interpretation.	All design policies are applicable in all areas. LPSS Policy D1 and LPDMP Policy D9 include specific considerations for villages.
West Clandon Parish Council		

	<p>It is not clear how these DMP's relate to Neighbourhood Plans. Do the DMP provisions override NP's? There is little reference to NP's in the draft documents.</p>	<p>NPs are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with. So replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added.</p> <p>There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.</p>
	<p>West Clandon is the village most vulnerable to being submerged by the Eastward expansion of Guildford. Sites at Garlick's Arch, Burnt Common and Gosden Hill on land taken from the Green Belt in the latest LPSS are allocated for development. At present there is a "green gap" between the urban area and the village. Are there any management policies that would prevent this "green gap" being closed in the next or future reviews of the LPSS?</p>	<p>The land between Guildford urban area and West Clandon is designated Green Belt. This is a very restrictive policy. Any proposals to revise the Green Belt boundary would need to be done through the plan-making process.</p>
<p>Holy Trinity Amenity Group</p>		
	<p>Despite the title including "Issues" these are often not identified. The "Options" are also few; of the 30 policies most have as an alternative to the preferred option only "no policy". An obvious and helpful approach would have been to state which existing policies from the 2003 Plan needed changing, and why. We do not agree that "carrying forward the wording of the 2003 policies is not considered a reasonable alternative..". Many of the 2003 policies remain valid.</p>	<p>Each chapter had a section identifying 'issues'. The LP 2003 was prepared in accordance with different legislation and national planning policy. The LP03 wording has been considered in drafting the new policies. For most policies there is no other reasonable alternative however the purpose of the Regulation 18</p>

		consultation was seeking views on whether there were any other options.
	We need to know exactly what additional SPDs are intended to be produced to complete the plan and allow acceptable removal of all the 2003 plan.	Where there is an intention to produce an SPD this has been identified in the LPSS or emerging LPDMP.
Hallam Land		
	On the 21st July 2020, the Council's Executive will consider a report that recommends the adoption of the Supplementary Planning Document for the allocated Strategic Sites. Given that this SPD includes "detailed formal guidance" specific to the individual Strategic Sites, it is reasonable for the promoters of those sites to look first and foremost to that document rather than the Development Management Policies Document. Adherence to, and achievement of, the SPD's design and development guidance should be wholly appropriate and sufficient without the additional consideration of the further layer of policy provided by the Development Management Policies. In this context, we would invite the Council to explain the primacy of the SPD as it relates to the Strategic Sites in the introductory section of the Development Management Policies DPD so that the decision-maker is aware of the greater weight that should be afforded to the SPD.	The LPDMP forms part of the development plan whereas the SDF SPD is guidance only. It is considered that the LPDMP and SDF SPD are complementary.
Send Parish Council		
	The Send Neighbourhood Development Plan is on track to be adopted ahead of the DMP (as are others) and SPC is disappointed that more reference is not made to these important components of the Borough's Development Plan, which carry full weight in the decision making process.	There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.
	Guildford Borough Council has the allocated sites in Send for delivery in the first five years of the Local Plan which was hastily adopted in April 2019, two weeks before the general election. At the same time the village was inset from the Greenbelt which has seen a significant number of applications come forward for development in previous Greenbelt land. The new policies in this consultation recognise that the existing policies need updating and SPC is concerned that the majority of applications in Send will be decided with reference to policies already deemed out of date.	Current planning applications will be assessed in accordance with the LPSS including Policy D1 and national policy and guidance including the National Design Guide. It is considered that these provide sufficient policy guidance to ensure high quality design.
	Residential Design Guide (2004) is referenced in several places. SPC is concerned that this policy which is clearly dated will carry little weight in planning application decisions,	The National Design Guide provides comprehensive and detailed policy

	<p>especially with the existence of the National Design Guidance. However, the many and varied character areas of Guildford need to be clearly defined. This needs updating urgently and reference Neighbourhood Plans.</p>	<p>guidance to ensure that development responds positively to its context. Character will be assessed in more detail as part of each individual planning application. The Government has published the draft National Design Model Code with the expectation that local authorities prepare Local Design Codes. This will be prepared however it sits outside of the LPDMP process.</p> <p>NPs are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with. So replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added.</p> <p>There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.</p>
	<p>The weight of the guidelines is on Housing in Urban Areas and there are policies covering development in the Green Belt and Countryside. But there is no clear policy for Housing in Rural Areas that has been removed from the Green Belt. This gap must be addressed, and it is important that we do not lose the thrust and specification of the policies in the saved Local Plan 2003 which currently provide clear guidance and leave little open to interpretation.</p>	<p>All design policies are applicable in all areas. LPSS Policy D1 and LPDMP Policy D9 include specific considerations for villages. The LP 2003 was prepared in accordance with different legislation and national planning policy. The LP03</p>

		wording has been considered in drafting the new policies.
West Horsley Parish Council		
	It is disappointing that there is virtually no reference to Neighbourhood Plans throughout the topic papers and suggested policies. Once adopted Neighbourhood Plans are part of the Borough's Development Plan, and carry full weight in the decision-making process. WHPC recommends that the proposed policies should make reference to Neighbourhood Plans and a general reference to these should be provided in the introduction.	<p>NPs are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with. So replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added.</p> <p>There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.</p>
	WHPC recommends that a review is made of Enforcement Notices, closed and open, over the last few years. This will enable GBC to ascertain the key issues that reoccur which could be covered by additional policies, or clearer definitions in the policies existing and proposed.	It is considered that the emerging plan addresses the policy content necessary for Guildford. Development Management has been involved in their preparation to ensure that it addresses any policy gaps that are considered to exist.
	Residential Design Guide (2004). This document is mentioned in several places. While still referenced, its dated approach would potentially carry little weight in planning application decisions, especially with the existence of the National Design Guidance. However, the many and varied character areas that make up the Borough of Guildford need to be clearly defined. WHPC recommends that the Residential Design Guide is updated urgently. Again, reference should be to local Neighbourhood Plans.	The National Design Guide provides comprehensive and detailed policy guidance to ensure that development responds positively to its context. Character will be assessed in more detail as part of each individual planning application. The Government has published the draft National Design Model

		<p>Code with the expectation that local authorities prepare Local Design Codes. This will be prepared however it sits outside of the LPDMP process.</p> <p>NPs are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with. So replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added.</p> <p>There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.</p>
East Clandon Parish Council		
	<p>It is therefore disappointing that there is little reference to Neighbourhood Plans throughout the topic papers and suggested policies. Once adopted, Neighbourhood Plans are part of the Borough's Development Plan, and once adopted carry full weight in the decision-making process. Almost all these proposed policies should make reference to Neighbourhood Plans and a general reference to these should be provided in the introduction. They must be listed as Policy Documents to refer to.</p>	<p>NPs are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with. So replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added.</p>

		There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.
	The issues of infilling, and proportionality/harm to the openness of the Green Belt for extensions to homes in the Green Belt come up constantly in discussions at applicant, parish and borough council level. GBC has an opportunity here to address these by having policies to support and further clarification for Policy P2: Green Belt in the adopted Local Plan (part one). Policy P2 as it exists is open to interpretation and does not provide clear definitions and guidance on these key issues, as well as many others.	It is not considered necessary to have another policy on Green Belt. A Green Belt SPD will however be prepared to provide some additional guidance.
	The LPDMP has little to say on infrastructure provision.	This is addressed in the LPSS.
	For all LPDMP Policies the only alternative to the given preferred Policy is 'To not have a specific policy,' because "No policy' is the only reasonable alternative as no further options were identified.' This is obvious nonsense: reasonable alternatives, these should be identified even though they might not be as good. This issue is examined in Section 6 of the Sustainability Assessment, where for example the pros and cons of specific housing densities are investigated. The society is concerned LPDMP is open to challenge during applications as it does not discuss alternatives considered. The council need to document the alternatives considered more fully	For most policies there is no other reasonable alternative however the purpose of the Regulation 18 consultation was seeking views on whether there were any other options. The Sustainability Appraisal explores the implications of those policies for which there are 'reasonable alternative options'
	The Local Plan 2003 included the following which is missing from the LDMP: <ol style="list-style-type: none"> 1. List of scheduled monuments 2. Lists of SSSIs, SNCIs and RIGS. RIGS are given in the new P14. 3. Notifiable installations. 4. Glossary. Many 'Definitions' are scattered throughout the new Plan. A single Glossary would be better. 	<ol style="list-style-type: none"> 1. The supporting text includes a list of scheduled monuments. 2. The policy on SSSIs and SNCIs is contained in the LPSS. It is not therefore appropriate to list them in the LPDMP. All sites are contained on the Policies Map. 3. The legislative requirement for local plans to contain a policy on hazardous materials has been removed. The NPPF requires that Local planning authorities should consult the appropriate bodies when planning, or determining

		<p>applications, for development around major hazards. This includes major hazard installations and pipelines, licensed explosive sites and nuclear installations.</p> <p>4. Specific definitions are provided under relevant policies to ensure the decision maker understands what certain terms mean. The glossary is used for more general terms.</p>
Guildford Society		
	<p>Sadly, the LPDMP like so many Planning Documents has not been available even in draft form at the adoption of the LPSS. The LPSS was adopted in 2019 it is unacceptable that the LPDMP is only due for adoption in 2021. Surely there needs to a measure of parallel rather than sequential development of these critical documents.</p>	<p>Given the resources available it was not possible to prepare them concurrently and given the complexity of the process it was not considered appropriate to prepare them as a single local plan.</p>
	<p>There is some concern that the weight of new policy could deter new planning applications and thus endanger GBC's ability to deliver housing to Plan. This could have dire consequences for the Borough. (The Council already lists information that may be required for a full planning application under 36 different headings.)</p>	<p>The suite of policies is considered necessary to ensure high quality sustainable development</p>
Residents for Guildford and Villages / Guildford Green Belt Group		
	<p>We want to ensure that the DMP ensures fair and equal treatment of all areas of the borough, and does not overly favour or neglect any areas. some of the proposed draft policies are vague, and potentially too open to differing interpretations. This is a problem which has plagued planning applications and decision-making for some time. In some areas that we consider critical the proposals contradict the National Planning Policy Framework requirement that policies must be clear, unambiguous and backed up by evidence.</p>	<p>Where specific concerns have been raised these have been addressed under the relevant policy.</p>
	<p>There are requirements for a local planning authority to support neighbourhood planning. The PPG states: "Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body. This could include sharing evidence and</p>	<p>NPs are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate</p>

	<p>seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.</p> <p>Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan. Local plan policies should not duplicate those in the neighbourhood plan, and do not need to supersede them unless changed circumstances justify this. It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals, and similarly for neighbourhood plans to acknowledge local plan policies that they relate to.”</p> <p>Despite the significant number of Neighbourhood Plans which are adopted or at an advanced stage of preparation, the DMP is largely silent in referencing them within individual policies. Neighbourhood Plans should form a vital part of the development plan in large parts of the borough. A significant investment has been made by existing communities in their preparation. In many instances a substantial body of work has been undertaken in reviewing constraints, opportunities, local issues, character, density, landscape, heritage, community assets, planning objectives and countless other local matters. The DMP would not be effective or justified without further reference to them where appropriate.</p>	<p>weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with. So replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added.</p> <p>There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.</p>
	<p>Concern over the way in which the policies of the plan are laid out within the DMP.</p>	<p>The Regulation 18 document does not contain any policy wording. Where specific concerns have been raised these have been addressed under the relevant policy.</p>
	<p>The first policy within the plan is that of Housing Density and it appears that this sets the tone for the rest of the document. Density is a product of design and should be the end point of schemes which comply with the more important development plan policies such as affordable housing, open space, parking, amenity, design, and infrastructure rather than the starting point. A poorly designed scheme at an appropriate density can be equally, if not more, harmful than a well-designed scheme and higher density. It is therefore suggested that policy H4 is moved from the front of the plan and embedded into the Design Chapter Policies.</p>	<p>Agreed. Policy H4 has been deleted and the design led considerations which yield an appropriate density are instead addressed through emerging Policy D4 and D9.</p>
	<p>The Design Chapter could flow better in terms of structure. Policy D6 (Shopfront Design) and Policy D7 (Advertisements, hanging signs and illumination) should be moved to the end of the chapter to allow the main design policies to flow into one another. There should be greater cross referencing between policies and also clear</p>	<p>We can see the logic in doing so however we cannot do this until we adopt the plan as we need to make sure that all comments across all consultations are coded against the same policy number to</p>

	<p>linkages back to the Local Plan Part 1 to ensure it is clear that compliance with the broader suite of policies is required in order for applications to be approved.</p>	<p>ensure that the inspector can understand the issues raised throughout plan preparation.</p>
	<p>Further guidance on height of development proposals is missing. Within part 1 of the Local Plan there is significant reference to height of proposed buildings in respect of the character of the surrounding area. Many of the allocated sites require consideration of the height of any future proposals.</p> <p>The town centre of Guildford and the rest of the borough contains substantial constraints in terms of heritage, landscape and character which mean that buildings of height would have significant impact. This includes substantial areas of AONB and AGLV which are unique to this part of Surrey.</p> <p>The 2003 Local Plan set out the policy for Scale, Proportion and Form in policy G5 (2). It is appropriate and justified that the policies within the DMP should have a much greater focus on protecting the landscape. As part of this consideration of height within the borough would be the requirement to have staggered building heights in different locations across the borough. This would enable applications to be determined in line with the topography of the area in which they are situated. The DMP should place a requirement on applications over 5 storeys in height to be accompanied by a comprehensive 'views analysis' (taking into account both landscape and townscape). For more substantial applications, or those within a more sensitive heritage setting, this would be a critical chapter within any accompanying Environmental Impact Assessment.</p> <p>The evidence base to support a specific policy on height already exists: the Guildford Landscape Character Assessment Guidance (Volume 3: Townscape Assessment) could be ported into the DMP as a supporting document used to judge the potential impact of proposed developments on townscape and character.</p>	<p>Emerging Policy D4 requires the consideration of height, form and scale of buildings (covering the same content as Policy G5(2)). It is not possible to set a definitive height restriction as it will vary considerably even across a relatively small area as it will be informed by the surrounding buildings, topography, views, etc. Policy P1 provides policy on development in the AONB and AGLV and provides a policy hook for the AONB Management Plan.</p> <p>To set a trigger at over 5 storeys could be considered to be too prescriptive, arbitrary and gives the impression that anything 5 storeys or less is acceptable in principle which may not be the case. The trigger to undertake views analysis will be dependent upon its context/sensitivity which can vary depending on its location.</p> <p>The supporting text of emerging Policy D4 has been updated to state that views analysis may be required.</p> <p>Emerging Policy D4 requires that proposals have regard to relevant national and local design guidance – the supporting text clarifies that this includes the LCA.</p>

	<p>Within the document in general there should be greater cross referencing between policies and also clear linkages back to the Local Plan Part 1 to ensure it is clear that compliance with the broader suite of policies is required in order for applications to be approved.</p>	<p>It is not considered appropriate to cross reference between policies as the plan must be read as a whole. To cross reference would imply that certain policies may not be relevant when they are.</p>
	<p>The Alternative Options are poorly constructed and do little to justify the approach of individual policies. In many instances the alternative approach offered is to either have no policy at all or for a much more draconian / aggressive policy to be brought in but these are not decisions which have to be binary. Obviously neither scenario is palatable to the residents of Guildford but in no way should this be used as justification to bring in a policy that is not fit for purpose.</p> <p>There is a requirement for the DMP to be supported by a Sustainability Appraisal which must appraise the Reasonable Alternatives adequately. Considerable work is required in order to demonstrate that the Reasonable Alternatives have been taken into account in the preparation of the policies which will be contained within the DMP and it would be helpful for the Council to examine other councils' DMPs for more palatable alternatives.</p>	<p>For most policies there is no other reasonable alternative however the purpose of the Regulation 18 consultation was seeking views on whether there were any other options. The Sustainability Appraisal explores the implications of those policies for which there are 'reasonable alternative options'</p>
	<p>A key aspect of the Local Plan was the provision of a Sustainable Movement Corridor (SMC) under policy ID3. Further detail on the SMC has been set out within the Strategic Development Framework SPD. Many of the allocations within the Local Plan part 1 require consideration of, and connection to, the SMC. Despite this, there is no reference in the draft DMP to the SMC or the development framework SPD. The draft DMP is ineffective through the lack of reference to it.</p>	<p>Emerging Policy D4 requires that proposals have regard to relevant national and local design guidance – the supporting text clarifies that this includes the SDF SPD.</p> <p>Relevant LPSS site allocations also include requirements for the SMC. Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network – as drafted for the Regulation 19 consultation – requires that routes and infrastructure which comprise the Comprehensive Guildford borough Cycle Network including the cycle elements of the Sustainable Movement Corridor, as proposed to be represented on the Policies Map, will be the basis and starting point for the identification of improvements, primarily for utility cycling,</p>

		provided and/or funded by new development.
	<p>The increase in housing, and other forms of development, across the borough also has significant potential to cause light pollution. The Planning Practice Guidance contains a whole section on Light Pollution and how this can be addressed in plan making and decision taking. The final version of the DMP requires the inclusion of a specific policy in light pollution / dark skies in order for the DMP to be effective and consistent with national policy.</p>	<p>The LPDMP does now include a light pollution policy (D10a). The NPPF states that ‘by encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.’</p> <p>Emerging Policy D10a addresses potential light impacts on privacy, amenity and biodiversity.</p> <p>The issue of dark skies and ‘intrinsically dark landscapes’ is currently covered by the AONB Management Plan which LPSS Policy P1 provides a policy hook for. This states that: “In remoter locations, with darker skies, development proposals causing light pollution will be resisted”. To aid clarity and for added emphasis, this policy requirement has been transposed into emerging Policy D10a which has been broadened to cover ‘dark skies’.</p> <p>Furthermore, existing neighbourhood plans provide additional policy against which proposals can be assessed. The supporting text will reference this.</p> <p>In light of the above a borough wide approach seeks to limit the impact of light pollution, including reference to a dark skies element where justified. The policy is now considered to provide sufficient</p>

		policy hooks to prevent harmful light pollution. This does not prevent NPs from considering the merits of a dark sky policy within their area.
	Monitoring indicators should be included against each of the proposed policies.	This will be included in the Regulation 19 version once policies have been drafted.
	<p>The delivery of homes on strategic sites and in general is critical for maintaining the housing supply and protecting Green Belt. Key concern is the ability for developers to 'slow up' implementation and delivery following permission being granted. The NPPF para. 76 allows the imposition of conditions requiring development to begin within a timescale shorter than the default period.</p> <p>Poor delivery in terms of the Housing Delivery Test meant that the borough was required to produce a Housing Delivery Action Plan which was issued in draft form in August 2019 but is yet to be released in full. The Action Plan sets out a number of priorities to speed up delivery of housing. One such area is post-planning permission support which sets out the following in paragraph 3.36:</p> <p><i>Monitoring based on completion figures received by the LPA may not provide sufficient and nuanced information regarding possible delivery barriers, especially in relation to significant housing schemes. Opportunities thus exist for enhancement of monitoring and reporting of completions, but also tracking any major site level delivery barriers.</i></p> <p>Further measures must be put in place to incentivise, encourage and monitor the delivery speed of housing across the borough.</p>	<p>The Council already does use a shorted implementation period where this is justified. The Council has a new monitoring system in place which will continue to improve the outputs available. The Council continues to implement the actions in the Housing Delivery Action Plan to ensure delivery of homes is maintained.</p>
	<p>Policy S3 guides the delivery of development and regeneration within Guildford Town Centre. Para 4.1.22 states "The borough's town centre will form the key focus for these measures to support and accelerate growth in this sustainable location and maximise the use of previously developed land. This will occur with careful attention to the Local Plan's design policies, Development Management Policies, the provisions of any possible future Area Action Plan, as well as relevant SPDs including guidance on strategic views into and out of the town centre which will help to guide the appropriate location, form, scale and massing of development."</p> <p>Despite the significant importance of the town centre in the overall spatial strategy for GBC, there is very little mention of policy S3 throughout the draft DMP. Whilst the policy is referred to indirectly in a number of policies such as the design and density policies there is no specific DMP policy which relates directly to Town Centre Development.</p>	<p>Further discussion has been undertaken with the GER team to confirm that there are no additional policy areas to address within the scope of this plan.</p>

	<p>Concern over the lack of progress on the Town Centre Master Plan which is also critical to delivery of housing, infrastructure and general public realm improvements in Guildford.</p> <p>Concern that the lack of an effective policy in relation to the Town Centre will lead to a lack of delivery of much needed sustainable housing in the town centre which again would lead to further pressure on unsustainable and unsuitable housing sites to be released at the detriment of existing communities.</p> <p>The lack of effective, justified and positively prepared policies within the GBC development plan has led to the development of a number of inappropriate schemes in Guildford Town Centre, with the Solum Site being the prime example. Without proper policies for the town centre, there is very little that decision makers can do to guide the appropriate design, density, form, function and scale of development and ensure impacts are mitigated where necessary.</p> <p>A specific Town Centre Policy is needed within the next iteration of the DMP which will enable focused delivery of policy S3.</p>	
Compton Parish Council		
	<p>The overall framework (the spatial strategy in the Local Plan) is fundamentally wrong, ie the houses are in the wrong place, and will exacerbate existing traffic congestion on the local road network. There was no consultation or opportunity for input into the framework that underpins the Local Plan.</p>	This is beyond the scope of the LPDMP.
East Horsley Parish Council		
	<p>There are no further Green Belt policies included within the DMP document as presented. This is somewhat strange, given that the main objective of the DMP is to provide more operational details to planning officers beyond the broad policies set out in the Local Plan Part 1. By contrast, for example, 'Historic Environment' is addressed by Policy D3 in the Local Plan Part 1 and subject to extensive national policies but there are no less than five further Historic Environment policies within the DMP (Policies D16 to D20) providing further clarification of Policy D3.</p> <p>However, for the Green Belt no further detailed policies are included within the DMP to offer additional operational details beyond Policy P2. Given that the Green Belt represents 84% of land within the borough and is a complex subject frequently addressed in planning applications, we find it hard to understand why this approach is being taken.</p>	It is not considered necessary to have another policy on Green Belt. A Green Belt SPD will however be prepared to provide some additional guidance.

	<p>There is hardly any mention of Neighbourhood Plans throughout the entire DMP. Neighbourhood Plans are part of the Local Development Plan and are regularly cited in ongoing planning assessments. Therefore, it would seem logical for the DMP to include some references of them, particularly since many Neighbourhood Plans address a similar range of issues to those dealt with in the DMP.</p>	<p>NPs are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with. So replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added.</p> <p>There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.</p>
M&G Real Estate		
	<p>The Friary is one of the main commercial destinations in Guildford town centre. It plays a significant role in underpinning its vitality and viability. The LP provides a series of policies that seek to control the mix of uses within certain areas of the town centre, including the defined Primary Shopping Areas ('PSA') and defined Shopping Frontages ('Primary Shopping Frontage ('PSF') and Secondary Shopping Frontage ('SSF')). The retail evidence base¹ that supported the LP was published in 2015.</p> <p>The Emerging DMP provides an opportunity to for a new policy basis that supports the operation of the town centre and reflect modern commercial requirements.</p> <p>The role of town centres is evolving. This is a response to changing consumer habits and digital technology, which both create opportunities to attract consumers to town centres, but also reduces the attraction of centres (for example as a result of online shopping). Landlords and operators of town centre property have sought to provide a much wider offer to increase attraction and dwell times within centres. The number of retail requirements for new floorspace has significantly reduced and there are numerous examples of occupiers reducing their store portfolios.</p> <p>Urgent action is required to ensure that town centres can evolve and contribute to the prosperity and well-being of the local areas that they serve. Planning has a significant</p>	<p>Changes in legislation in terms of the use class order has provided additional flexibility for former A1 uses to convert to other E uses.</p>

	<p>positive role to ensure a framework is created that facilitates that future vitality and viability.</p> <p>The effects of Policy E7 act as a barrier to achieving the LP's town centre objectives and prevents the Council from providing a positive strategy for the town centre. Policy E7 provides restrictions on changing uses from Class A1 uses within the SSF of the town centre to alternative town centre uses, and provides a complete restriction on the conversion of Class A1 uses within the PSF to alternative town centre uses.</p> <p>A policy should be included within the Emerging DMP that replaces Policy E7 within the LP that better reflect occupational market requirements that operate within town centres. All efforts to promote alternative uses that drive footfall and ensure vitality should be taken in policy.</p>	
Other respondents		
	<p>The SANG proposal for Blackwell Farm (Strawberry Copse, Manor Copse and Wildfield Copse) is inappropriate and does not meet Natural England's SANG guidelines:</p> <ul style="list-style-type: none"> • Mainly dense (ancient) woodland with protruding tree roots with uneven/narrow pathways unsuitable for wheelchair/prams and unsuitable for infirm or disabled. Creating suitable paths would require tree removal. • Natural England maintain that the majority of visitors are female and safety is one of the primary concerns of site visitors. SANGs must be designed so that are perceived safe by users (NE guidelines). Extensive tree cover is not conducive to solo walkers feeling 'safe'. • Access within the SANG must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off the lead. It would be impossible to keep track of dogs off the lead in the dense woodland. • Works would be necessary to make Strawberry and Manor Copse less dense as to satisfy some of Natural England's design criteria – needs parts of the route free of tree or shrub cover. • COVID may remain with us and require even wider planned pathways which would compromise the ancient woodland status. • Any access via the Research threatens integrity of ancient woodland. 	<p>Any SANG proposal must be agreed by Natural England for it to be designated as such.</p>
	<p>Policies in the DMP 2020 are generally weaker than those in Local Plan 2003</p> <ol style="list-style-type: none"> 1. lack of clear guidance 2. One general policy, to replace a number of policies which previously gave specified guidance in LP 2003, does not give the same protection 	<ol style="list-style-type: none"> 1. Where specific concerns have been raised these have been addressed under the relevant policy.

	<ol style="list-style-type: none"> 3. No policy for AONB or Green Belt. 4. The protection for “views within, to and from the AONB” in the LP2003 has been much used but is omitted from the DMP. It protects the natural beauty of the AONB and gives control over building heights 5. There are no specified height restrictions given in policies for buildings in Guildford, which is necessary because of Guildford’s setting within a valley surrounded by AONB. 	<ol style="list-style-type: none"> 2. Where specific concerns have been raised these have been addressed under the relevant policy. 3. The LPSS adequately addressed Green belt and the AONB 4. LPSS Policy P1(4) references the AONB Management Plan which includes policies that protects views. 5. It is not possible to set a definitive height restriction as it will vary considerably even across a relatively small area as it will be informed by the surrounding buildings, topography, views, etc.
	<p>I am concerned at the lack of actual policy wording relating to Green Belt and Neighbourhood Plans in areas where it would be appropriate. This is particularly disappointing given the strength of feeling amongst residents and the time that many of them have given to the preparation of their Neighbourhood Plans.</p>	<p>Green Belt policy is included in the LPSS.</p> <p>NPs are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with. So replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added.</p> <p>There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.</p>

	<p>A policy on dark skies should be included, particularly for the AONB.</p>	<p>The LPDMP does now include a light pollution policy (D10a). The NPPF states that ‘by encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.’</p> <p>Emerging Policy D10a addresses potential light impacts on privacy, amenity and biodiversity.</p> <p>The issue of dark skies and ‘intrinsically dark landscapes’ is currently covered by the AONB Management Plan which LPSS Policy P1 provides a policy hook for. This states that: “In remoter locations, with darker skies, development proposals causing light pollution will be resisted”. To aid clarity and for added emphasis, this policy requirement has been transposed into emerging Policy D10a which has been broadened to cover ‘dark skies’.</p> <p>Furthermore, existing neighbourhood plans provide additional policy against which proposals can be assessed. The supporting text will reference this.</p> <p>In light of the above a borough wide approach seeks to limit the impact of light pollution, including reference to a dark skies element where justified. The policy is now considered to provide sufficient policy hooks to prevent harmful light pollution. This does not prevent NPs from</p>
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		considering the merits of a dark sky policy within their area.
	You have done your best to make the consultation process user-friendly but I do wonder how many people will have had the time or inclination to wade through a document that is 219 pages long. I hope at least that in due course you will be able to organise some public events to explain your thinking and to give people the opportunity to engage and to feel some ownership of the Plan as it is implemented.	There will be further consultation on the Regulation 19 version of the plan. Public events will be organised Covid permitting.
	Perhaps it should be compulsory that any developments over 90 dwellings include CGI imagery as part of their planning application.	This is not considered reasonable and would incur considerable and unjustified costs.
	Developments should not be allowed where infrastructure is at tipping point. if Guildford's water supply is already under severe strain, for example, question D12, why is this not considered crucial to limiting development?	LPSS Policy ID1 requires that infrastructure is in place at the point it is needed.
	Details of Green Belt policies are missing from this Development Management Policy document (Local Plan Part 2). Almost every other topic has detailed operational policies. The Green Belt is a major and important subject when it comes to Planning so the omission of detailed Green Belt policies is significant. It is also unacceptable because without further operational details applicants may be unsure how to interpret some of these important but generalised Green Belt policies.	It is not considered necessary to have another policy on Green Belt. A Green Belt SPD will however be prepared to provide some additional guidance.
	In the first edition, long, long ago space was found for Guildford City Football Club to create a Community Football Ground. In later editions it vanished. Guildford is probably the largest town in the country without a professional football club. We are preparing a plan for the future where we can work closer with businesses in the town. We will never get anywhere without a ground of our own.	A site would need to be proposed that was suitable for this use and deliverable over the lifetime of the plan. No such site has been found/proposed.
	I have been researching how to combat isolation and loneliness for a few years now and have some solutions. One very helpful item is to have a place where people in the community can just drop in. The Weyside Cafe would be ideal.	The proposals for Weyside Urban Village include community uses which could include a café.
	Does the set of policies provide adequately for handicapped and disabled people?	LPSS Policy D1(9) requires that all new development is designed to meet the needs of all users, this includes the setting of the building in the wider environment, the location of the building on the plot, the

		gradient of the plot, transport infrastructure and public realm.
	What is the point of this consultation if it will be ignored like the previous consultation?	The Consultation Statement will set out the main issues raised and the Council's response to these.
	SANGs may work in theory but in practice are misused. The SANG at Long Reach is too far from the proposed development at Effingham and the proposed SANG at Wisley Airfield will attract people to the SPA. The Local Plan should prevent this from happening.	SANG guidelines are set by Natural England.
	Almost without exception, no building work (homes, offices, roads, infrastructure, etc) must take place on flood plains, especially class 3 flood plains. The knock-on effect when this occurs can be catastrophic, especially around Guildford	This is addressed by national policy and LPSS Policy P4.
	AONB must be preserved and protected (along with the associated flora and fauna and their habitats)	This is addressed by LPSS Policy P1.
	Where in-filling occurs, this must be in-keeping with other properties in the surrounding locale with regards style and size,	Design policies require that developments respond positively to their surrounding context.
	An addition should be made to the GBC planning approval rules to protect Guildford residents from unacceptable noise, etc. Proposed addition: "Unless a special dispensation has been requested and approved by GBC Planning Department, scheduled "building works" (i.e. progressing a development) in the borough of Guildford can only take place between the hours of 8am and 6pm on weekdays, and between 8am and 1pm on Saturdays. No "building work" to take place on Sundays or UK Bank Holidays."	Issues to do with construction is covered by separate Environmental Health legislation. This matter can also be considered through planning conditions not through policy.
	For all LPDMP Policies the only alternative to the given preferred Policy is 'To not have a specific policy,' because "No policy' is the only reasonable alternative as no further options were identified.' This is obvious nonsense: it would be trivially easy to identify reasonable alternatives, though they might not be as good. This issue is examined in Section 6 of the Sustainability Assessment, where for example the pros and cons of specific housing densities are investigated.	For most policies there is no other reasonable alternative however the purpose of the Regulation 18 consultation was seeking views on whether there were any other options. The Sustainability Appraisal explores the implications of those policies for which there are 'reasonable alternative options'

	<p>The LPDMP in combination with the LPSS expands considerable the extent of Policy concerning land use. There is some concern that the weight of new policy could deter new planning applications and thus endanger GBC's ability to deliver housing to Plan. This could have dire consequences for the Borough. (The Council already lists information that may be required for a full planning application under 36 different headings.)</p>	<p>The suite of policies is considered necessary to ensure high quality sustainable development</p>
	<p>The following were included in the 2003 plan but are missing from the new plan:</p> <ol style="list-style-type: none"> 1. List of scheduled monuments 2. Lists of SSSIs, SNCIs (RIGS are listed in the new P14) 3. Notifiable installations. Four gas installations are given in the 2003 plan. 4. Glossary. Many 'Definitions' are scattered throughout the new Plan. A single Glossary would be better. 	<ol style="list-style-type: none"> 1. A list of scheduled monuments has been included in the supporting text. 2. The policy on SSSIs and SNCIs is contained in the LPSS. It is not therefore appropriate to list them in the LPDMP. All sites are contained on the Policies Map. 3. The legislative requirement for local plans to contain a policy on hazardous materials has been removed. The NPPF requires that Local planning authorities should consult the appropriate bodies when planning, or determining applications, for development around major hazards. This includes major hazard installations and pipelines, licensed explosive sites and nuclear installations. 4. Specific definitions are provided under relevant policies to ensure the decision maker understands what certain terms mean. The glossary is used for more general terms.