

# Guildford borough Submission Local Plan: development management policies

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## Consultation and Duty to Cooperate Statement

May 2022



## **Alternative formats**

If you would like to read this consultation document in a different format such as large print or a different language, please contact Planning Policy:

Telephone: 01483 444 471

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All Submission documents relating to the LPDMP can be found along with other supporting information on the Guildford Borough Council website at: [X Awaiting new website X](#)

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# 1. Overview

- 1.1 This Consultation and Duty to Cooperate Statement describes how Guildford Borough Council has undertaken community participation and stakeholder involvement in the production of the Proposed Submission Local Plan: Development Management Policies (LPDMP), in accordance with Regulation 19. It has been produced to support Guildford borough's Regulation 18 Consultation Statement as published in January 2022 (see Appendix 7). These two documents together respond to and therefore fulfil the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and specifically Regulation 22(1) part (c).
- 1.2 Regulation 22(1) part (c) requires the submission to the Secretary of State of a statement setting out:
- (i) which bodies and persons the local planning authority invited to make representations under Regulation 18
  - (ii) how those bodies and persons were invited to make representations under Regulation 18
  - (iii) a summary of the main issues raised by the representations made pursuant to Regulation 18
  - (iv) how any representations made pursuant to Regulation 18 have been taken into account
  - (v) if representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations and
  - (vi) if no representations were made in Regulation 20, that no such representations were made.
- (Regulation 20 refers to representations made regarding the local plan published at Regulation 19 stage.)
- 1.3 It also seeks to demonstrate that the Council has fulfilled its legal 'Duty to Cooperate' as set out by the Planning and Compulsory Purchase Act 2004 (as amended) and by the National Planning Policy Framework. This places a legal duty on local planning authorities and county councils in England and public bodies to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. This is in addition to the statement made in the Regulation 18 Consultation Statement (January 2022).



## 2. Introduction

- 2.1 This Consultation and Duty to Cooperate Statement sets out how Guildford Borough Council (the Council) undertook consultation on the Guildford borough Proposed Submission LPDMP during 2022 in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It summarises who was invited to make representations, how we consulted, the comments that were received and how these were taken into account.
- 2.2 It also sets out the reasons why the Council, does not consider the policies raise any cross boundary strategic matters, as defined by the Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended). This means that the legal Duty to Cooperate is not engaged as part of this plan's preparation but in any event sets out the steps that were taken to liaise with bodies who might have been subject to such a duty.
- 2.3 To date, the Council has undertaken one consultation under Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 18 and one consultation under Regulation 19, as detailed below.
- 2.4 Consultation on the Guildford borough Local Plan: Development Management Policies Issues, Options and Preferred Options document took place between Wednesday 3 June and Wednesday 22 July 2020 over a seven-week period
- 2.5 Consultation on the Guildford borough Proposed Submission Local Plan: Development Management Policies document took place between Friday 7 January and Friday 18 February 2022 over a six-week period.
- 2.6 Therefore, in total we have consulted for 13 weeks and given the community significant opportunities to provide input and comment on the emerging Draft and Proposed Submission versions of the LPDMP. This meets the requirements in relation to the number and length of consultations stipulated in the Regulations for Regulation 18 and 19. See Appendix 1 for a list of the Local Plan consultees.
- 2.7 In the Regulation 18 stage consultation approximately 1,300 comments were received and approximately 90 people/organisations made representations.
- 2.8 In the Regulation 19 stage consultation approximately 450 comments were received and approximately 75 people/organisations made representations.
- 2.9 In total, after the Regulation 18 and 19 consultations, approximately 1,750 comments were received from approximately 135 different people/organisations.
- 2.10 Figure One below summarises the types of people/organisations that submitted comments at both the Regulation 18 and 19 stages.

Left blank Group	Regulation 18 Stage		Regulation 19 Stage	
	Number	% of total	Number	% of total
Developer/landowner/planning consultant	14	16	16	22

Statutory/prescribed body (e.g. Surrey County Council, Environment Agency, Surrey Local Nature Partnership, service providers, etc)	20	22.5	10	13
Local organisation/parish council/resident's association/political party	27	30	26	35
Member of the public	28	31.5	22	30
Total	89	100	74	100

2.11 This statement sets out what consultation has been undertaken in accordance with Regulation 19 in 2022, when, and with whom. It has been produced to support the Guildford borough Regulation 18 Consultation Statement (January 2022) (see Appendix 7). These two documents together respond to and therefore fulfil requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and specifically Regulation 22(1) part (c) which states that a Consultation Statement has to be produced to set out:

- (i) which bodies and persons the local planning authority invited to make representations under Regulation 18
- (ii) how those bodies and persons were invited to make representations under Regulation 18
- (iii) a summary of the main issues raised by the representations made pursuant to Regulation 18
- (iv) how any representations made pursuant to Regulation 18 have been taken into account
- (v) if representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations and
- (vi) if no representations were made in Regulation 20, that no such representations were made.

2.12 The Regulation 18 and Regulation 19 Consultation Statements combined will assist the Inspector at the Examination in determining whether the borough's Local Plan complies with the requirements for public participation and government guidance.

2.13 Both documents together show that the consultation carried out by the borough has complied with the statutory requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulation 18 and 19). They also show that public involvement was carried out following the approach set out in the Council's 'Statement of Community Involvement' document (May 2020). This was updated in light

of the COVID-19 pandemic and included changes to how we will publicise planning policy documents for consultation purposes during the COVID-19 pandemic or similar periods of national/local emergency. The document can be found on the Council's website here: <https://www.guildford.gov.uk/article/23604/Find-out-how-we-involve-the-community-in-our-policies>

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### 3. Consultation on Proposed Submission LPDMP (2022)

#### **Proposed Submission LPDMP Regulation 19 Consultation**

- 3.1 This section of the Consultation Statement sets out how the Council undertook a consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 during 2022. Consultation on the Proposed Submission Local Plan: Development Management Policies (2022) took place between Friday 7 January and Friday 18 February 2022 (a six-week period).
- 3.2 The six-week period meets the statutory requirements of the Regulations. It gave the community and other interested stakeholders the opportunity to review and comment on the Proposed Submission Local Plan: Development Management Policies (2022).

#### **Draft Parking Supplementary Planning Document Consultation**

- 3.3 The Council simultaneously undertook a consultation on the Draft Parking Supplementary Planning Document (SPD) under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 during 2022. Consultation on the Draft Parking SPD took place between Friday 21<sup>st</sup> January and Friday 18<sup>th</sup> February 2022 (a four-week period).
- 3.4 The four-week period meets the statutory requirements of the Regulations and gave the community and other interested stakeholders the opportunity to review and comment on the Draft Parking SPD. The SPD provides detailed advice and guidance on Proposed Submission LPDMP “Policy ID11: Parking standards” and “Policy ID3: Sustainable transport for new developments” in the adopted Local Plan: Strategy and Sites 2015-2034 (2019).
- 3.5 Some of the comments made under the Draft Parking SPD consultation related to policy in the Proposed Submission LPDMP, specifically “Policy ID11: Parking Standards”. These comments were incorporated into the Proposed Submission LPDMP Regulation 19 stage consultation statement for completeness and ensured a holistic approach was taken so that comments were sufficiently addressed in relation to the wider Local Plan context. [This was in addition to the comments being considered as part of the Draft Parking SPD Consultation].

#### **Promotion of the consultation period**

- 3.6 The Proposed Submission Local Plan: Development Management Policies (2022) consultation period was promoted through a range of means such as emails, local media relations, digital and social media and a variety of other methods:
- Press release highlighting the Proposed Submission Local Plan and promoting the consultation on 6 January 2022 (see Appendix 5)
  - Coverage in local media including the Guildford business e-newsletter and the Guildford Dragon News

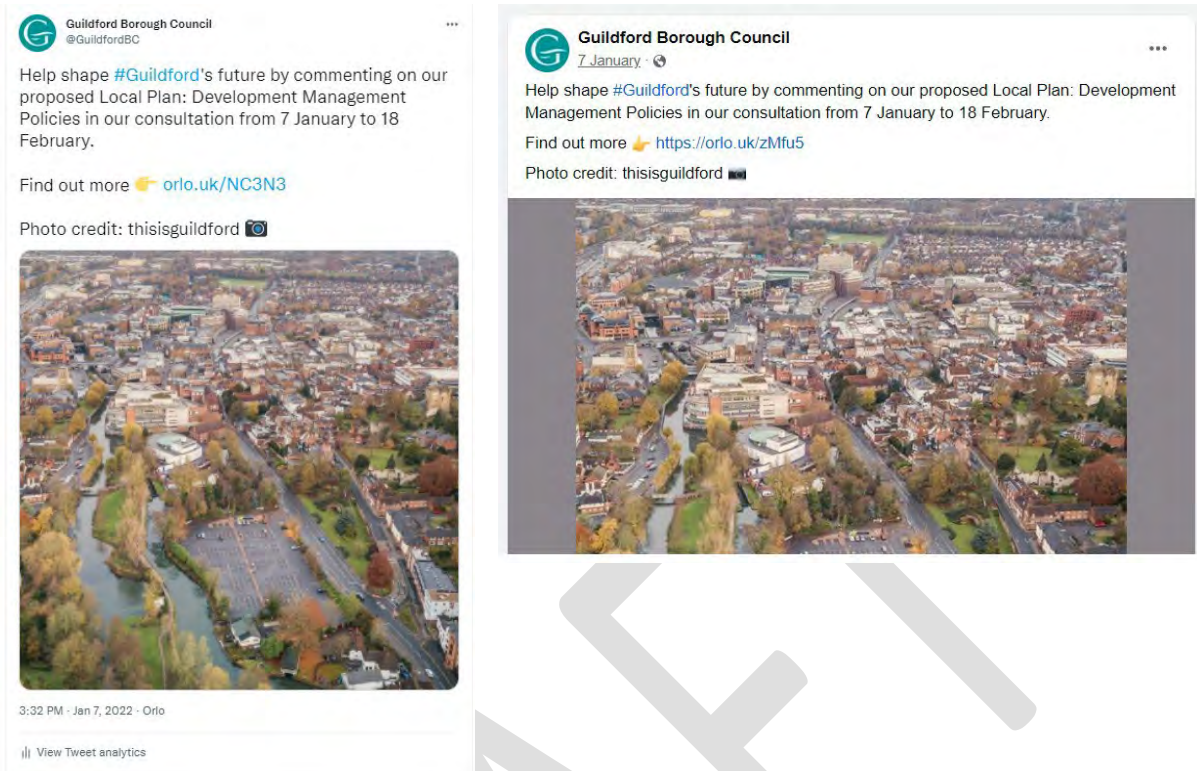
- Regular, repeat and pinned posts on Guildford Borough Council social media accounts via Twitter, Facebook, Instagram, LinkedIn and Next Door
- Emails to approximately 3,000 people from the database of Local Plan stakeholders
- Letters to approximately 35 people from the database of Local Plan stakeholders
- Internal Council communications to officers and elected members
- Leader of Guildford Borough Council mentioned the consultation in his leader communications and in Executive and Full Council sessions
- Updates to the microsite dedicated to the Local Plan (part of the Council's website) and links from the front page of the main Council Website

3.7 The press release was issued to local media on 6 January 2022 and remained on the News and Event page on the website thereafter. The press release explained how to leave feedback on the Plan and the deadline for doing so, see Appendix 5.

3.8 The Local Plan webpage, which sits within the Council's main website, was utilised to make information on the consultation more accessible. The online consultation system, INOVEM, was embedded into the microsite enabling online feedback to be provided more easily.

3.9 The INOVEM consultation homepage was available to view at <https://guildford.inconsult.uk/LPDMP21/consultationHome>. The consultation homepage included an explanation of the Local Plan, a copy of the Proposed Submission LPDMP and all associated documents available to download, and 'how to comment' was explained.

3.10 Figure Two: Social media post examples from Twitter and Facebook:



3.11 The engagement metrics from the Twitter and Facebook posts in Figure Two indicate the two posts were seen by approximately 1,400 people.

**Consultation methods**

3.12 In-person consultation events did not take place due Covid-19 restrictions, imposed by national Government, being in place. However, while in-person consultation could not take place, the Local Plan and accompanying documents, including the representation form, were made available in hard copy, which could be viewed and accessed at the following locations across the borough:

- Guildford Borough Council offices, Millmead House, Millmead, Guildford, GU2 4BB during office hours (excluding Bank Holidays).
- Guildford Library,
- Ash Library,
- Horsley Library and
- Shere Diamond Jubilee Library.

3.13 In view of the Covid-19 restrictions and the Council's obligations in terms of the Public Sector Equality Duty, under the Equalities Act (2010), we took extra measures to enhance the consultation to help consultees access the relevant information. These further activities included the following:

- Accepting all late submissions by respondents. This was to take into account any delays in postal notifications, illnesses due to COVID-19, issues accessing the online material and generally to allow more time to access material and to respond.
- Offering 15-minute online meeting slots with the relevant planning officers through Microsoft Teams. These meetings were to clarify any issues and enhance understanding prior to submission of written comments.
- Including in all notifications, as well as the planned press release, contact information for the Council should consultees have difficulties accessing the online documents and wish to discuss the contents of the consultation document. [As part of any discussion with consultees, officers were asked to be open to considering whether necessary to provide a hard copy summary of the policies].

3.14 Throughout the consultation period the Planning Policy Team were available to answer email or phone queries.

3.15 The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020 alongside updates to our Statement of Community Involvement prior to the Regulation 18 consultation period commencing meant we were still able to meet the statutory requirements (as mentioned in paragraph 2.13).

### **Feedback and questionnaire**

3.16 Feedback from the community and other interested stakeholders was sought primarily through the Council's online consultation system, INOVEM, which made submitting comments on the Plan easy and accessible, allowing people to consider what they wanted to say and in their own time. Emails and letters were also accepted, with the Statement of Representations Procedure and Statement of Fact encouraging the use of the online questionnaires and representation form. The use of these was recommended to ensure that comments were related to matters relevant to the subsequent examination of the Local Plan by a Planning Inspector.

3.17 Figure Three: The options for providing feedback:

<b>Method</b>	<b>Further detail</b>
Online consultation system – INOVEM	The online system allowed people to input and save their response. The portal can be accessed here: <a href="https://guildford.inconsult.uk/LPDMP21/consultationHome">https://guildford.inconsult.uk/LPDMP21/consultationHome</a>
Email and post	We set up a project postal and email address so people could send their written responses to us.
Consultation response form	This was attached to emails and letters, and available in the Council offices and libraries

3.18 A copy of the consultation response form and the online consultation system webpage are found in Appendices 3 and 4 respectively. The six questions are listed below:

- **Question 1: The evidence base and submission documents** - *Do you agree that the evidence used for the Proposed Submission Local Plan: Development Management Policies (2021) is adequate, up-to-date and relevant?*
- **Question 2: Legal Compliance** - *Do you consider the Proposed Submission Local Plan: Development Management Policies (2021) as a whole is legally compliant?*
- **Question 3: Soundness** - *Do you consider the Proposed Submission Local Plan: Development Management Policies (2021) as a whole is sound?*
- **Question 4: Duty to cooperate** - *Do you consider the Proposed Submission Local Plan: Development Management Policies (2021) as a whole has complied with the duty to cooperate?*
- **Question 5: The content of the plan** - *Comments on individual policies, paragraphs and sections of the document via Questionnaire two.*
- **Question 6: Any other comments?** - *Do you have any other comments that have not been covered by the previous questions?*

3.19 There were two questionnaires on the online consultation system which allowed the community and other interested stakeholders to make both general and specific comments:

- The "Online questionnaire: general comments about the plan or process" asked questions about the plan as a whole and the plan making process regarding matters such as legal compliance, soundness and the duty to cooperate.
- The "Online questionnaire: specific policies, sections and paragraphs" asked for comments about specific policies, paragraphs or sections of the plan.

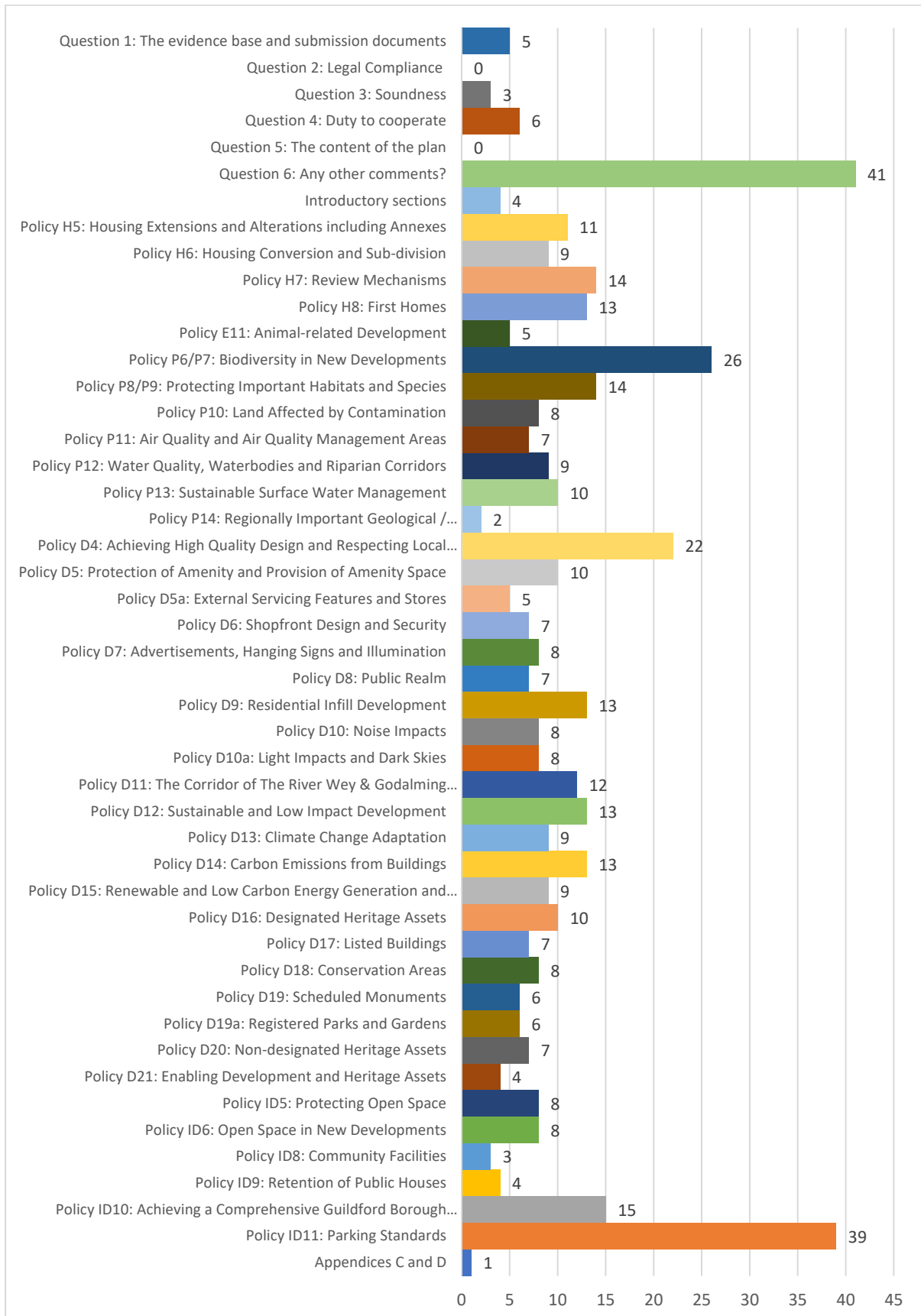
3.20 On the online consultation system, questionnaire one asked questions about the Proposed Submission LPDMP as a whole and the documents that have informed and supported the plan (Questions 1, 2, 3, 4 and 6). Questionnaire two allowed comments to be made about a particular section or policy, thereby answering Question 5.

3.21 As a result of the questionnaires, consultation response form, and other feedback mechanisms, approximately 450 comments were received from over 70 people, organisations and stakeholders during this consultation period.



3.22

Figure Four: Chart showing the number of comments per Proposed Submission LPDMP question/policy.



3.23 As illustrated in the chart on the previous page (Figure Four) the topic most frequently commented on was “Question 6 for Any other comments” (41 comments received), followed by 39 comments on “Policy ID11 on Parking Standards”. [Partly due to the inclusion of relevant policy related comments made in the Draft Parking SPD, see Paragraph 3.5]. There were no responses to “Question 2: Legal Compliance” and it is important to note there are no direct responses to “Question 5: The contents of the plan” because this consists of comments under each of the individual policies.

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## 4. Main Issues raised during Regulation 19 consultation

- 4.1 The Main Issues identified within the representations received during the Regulation 19 consultation in 2022 are set out in Appendix 6, along with the Council's response. For each policy, the representations have been split into three groupings. At the first section of each policy are the main issues raised by 'Prescribed Bodies' defined by Section 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as those with whom the Council has a Duty to Cooperate. This is followed by the main issues raised by other organisations/statutory consultees which are in turn followed by the main issues raised by individuals.

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## 5. Compliance with the Duty to Cooperate

- 5.1 Introduced by the Localism Act 2011, the Planning and Compulsory Purchase Act 2004 (as amended) places a legal requirement on local planning authorities to engage constructively, actively and on an ongoing basis with other prescribed bodies in relation to strategic matters. Strategic matters are defined as those that would either 'have a significant impact on at least two planning areas' or concern a 'county matter', in other words in summary they raise cross-boundary issues.
- 5.2 A "county matter" has a relatively narrow definition and is in effect limited to matters relating to minerals, minerals waste, aggregates, manufacture of cement and waste. The policies in the draft LPDMP do not relate to, nor have they a significant impact upon, a county matter and therefore no strategic matters arise as a result of that part of the definition.
- 5.3 This leaves consideration of the second part of the definition and whether the policies within the draft LPDMP would "have a significant impact on at least two planning areas". The LPDMP forms the second part of the Council's new Local Plan. It follows on from the Local Plan: strategy and sites (LPSS) adopted in 2019. The LPSS sets the spatial development strategy and allocates specific sites in order to meet all development needs. It also includes a suite of strategic policies that set the overarching strategy to managing growth across the borough. The draft LPDMP does not allocate any sites and is comprised of the more detailed development management policies.
- 5.4 Paragraph 21 of the NPPF requires that local plans identify which policies are strategic and which are non-strategic (see Appendix C of the Proposed Submission LPDMP). However, simply because a policy is strategic in nature and necessary to address the strategic priorities of the area, it does not necessarily follow that the policy raises strategic matters that cross administrative boundaries. Having undertaken an appraisal of the strategic policies as part of preparation of the Proposed Submission LPDMP, the Council is of the view that none result in any strategic cross-boundary matters because they are either:
- providing additional detail and clarification to requirements that are already set out in national policy in order to help provide clarity for both applicants and the decision maker when assessing development proposals, for example Policy P11: Air Quality and Air Quality Management Areas,
  - providing for a local approach and have no/insignificant impact on neighbouring authorities, for example Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness; or
  - already reflecting a strategic approach that has had regard to potential cross boundary impacts, for example Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network.
- 5.5 The Council is therefore of the view that the legal duty to cooperate has not been engaged. Confirmation of this view was sought by writing to all neighbouring authorities and prescribed bodies. All neighbouring authorities and prescribed bodies have confirmed that they agree that there are no strategic cross boundary issues resulting from the LPDMP and therefore it is not

necessary to agree any statements of common grounds. Confirmation emails are found in Appendix 2.

- 5.6 Whilst the legal duty to cooperate may not be engaged, it is still imperative that in the process of plan-making every effort is made to ensure that the policies meet the NPPF tests of soundness. In order to do so, it is important that the prescribed bodies, who all have a statutory role within the planning system, are satisfied that the policies deliver effective outcomes insofar as it relates to their own planning remit. For this reason, the Council has ensured that there has been constructive, active and ongoing cooperation throughout the plan-making process. This has taken the form of both informal and formal engagement which is set out in more detail below.


### **Formal consultation**

- 5.7 The Regulation 18 consultation on the draft LPDMP was structured to ensure that comments received, in particular from the statutory and prescribed bodies, were as meaningful and detailed as they could be. This was achieved through including a preferred policy approach for each policy, and for most policies the inclusion of draft policy wording. This approach did result in very constructive and detailed comments from the prescribed bodies in terms of the amendments which they were seeking to ensure that the policies were effective and that they aligned with their strategic objectives. Please refer to Appendix 1 for a list of all consultees that were formally consulted.

- 5.8 At Regulation 19 consultation on the Proposed Submission LPDMP the following prescribed bodies submitted a formal representation:

- Environment Agency
- Highways England (now National Highways)
- Historic England
- Surrey County Council
- Waverley Borough Council
- Runnymede Borough Council
- Transport for London
- East Hampshire District Council

- 5.9 Every effort was made to positively address the comments made at Regulation 18 stage and the informal engagement prior to Regulation 19 stage (see paragraphs 5.11 – 5.12). Key comments from prescribed bodies at the Regulation 19 stage are summarised below:

- Environment Agency:
  -  a) Support changes made to and justifications to support Policies P12 and D11

- b) Acknowledge and accept the justifications made where the changes suggested (during Regulation 18) could not be applied
  - c) In respect to issues within their remit, consider the Proposed Submission LPDMP to be sound
- Highways England (National Highways):
  - a) Requested they are consulted as the plans for the Guildford Borough Cycle Network develop
- Historic England:
  - a) Comments on Regulation 18 have been largely addressed in the Council's response to their comments and are reflected in the current Submission version
  - b) The key test of the soundness of the plan in respect of the elements that relate to the historic environment have been met
- Surrey County Council:
  - a) Proposed changes at the Regulation 18 consultation were incorporated into the policy
- Waverley Borough Council:
  - a) The approach in the LPDMP is now unlikely to have any cross-boundary impacts
  - b) Any potential cross-boundary impacts could be dealt with through the development management process
- Runnymede Borough Council:
  - a) No comments to make.
- Transport for London:
  - a) No comments to make.
- East Hampshire District Council:
  - a) No comments to make.

5.10 For a more detailed understanding about all the comments made by prescribed bodies and the resulting changes, please refer to the top of each policy's Main Issues table in Appendix 6.

### **Informal consultation**

5.11 Prior to the LPDMP Regulation 19 consultation, an additional informal consultation was undertaken with all the prescribed bodies that submitted a representation at Regulation 18 stage to allow them a further opportunity to make representations. Each prescribed body was sent a

collation of the main issues they had raised together the Council's response (as contained in Appendix 7) and a copy of the draft Regulation 19 LPDMP. This process enabled the prescribed bodies to understand what changes were proposed to the plan in light of their comments and gave them the further opportunity to raise any concerns or comments in relation to the emerging draft policies. The informal consultation occurred over a 4-week period from 2 August – 31 August 2021.

- 5.12 Overall, there was a positive response to the informal consultation and an acknowledgment of the changes that had been made in response to their Regulation 18 consultation comments. No further main issues were raised that caused the Council to consider alternative/amended policies to those reflected in the emerging Regulation 19 version of the LPDMP. There were however some useful comments which resulted in further, more minor, amendments being made to the policy/supporting text.

### **Ongoing targeted engagement**

- 5.13 Outside of the more 'structured' opportunities for engagement, a more targeted approach was undertaken in relation to the approach to biodiversity given its specialist and technical nature and the significant changes brought in by the Environment Act 2021.
- 5.14 Further targeted engagement was undertaken with Natural England on the proposed policy approach in relation to biodiversity net gain (BNG) and how it sits alongside the provision of Suitable Alternative Natural Greenspace (SANG). Natural England confirmed that it supported the ambitious 20% BNG requirement and were satisfied that the supporting text clearly details that all BNG on SANG must be above the minimum quality required for the functionality of the SANG, and states that this must be shown clearly within management plans, which provides the mechanism for which to assess the SANG and BNG. This ensures that the policy is consistent with their (then emerging) guidance.
- 5.15 The NPPF requires plans to take a strategic approach to the restoration of biodiversity and to operate at a landscape scale. Surrey's landscapes, Biodiversity Opportunity Areas and priority species and habitats cross district borders so it is important that biodiversity planning is coordinated by a central body. The Surrey Nature Partnership is the government mandated body for this role and is developing an approach for habitat restoration across Surrey. Local authorities must provide the planning policies that deliver the county approach, and it was therefore necessary for the Surrey Nature Partnership to be involved in policy development in order to ensure that policies both deliver the approach and are consistent across the wider area.
- 5.16 Alongside this, the context for biodiversity planning is changing rapidly at the national level and the Surrey Nature Partnership have been able to act as a critical friend, providing the expertise that is necessary to interpret and implement national approaches such as BNG. For this reason, there has been extensive ongoing engagement with the Surrey Nature Partnership which included multiple opportunities to comment and input on emerging policy wording for policies P6/P7, P8/P9 and P12 in particular. Their view on the approach to SANG and BNG was also sought to ensure it aligned with the views of Natural England.

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## Appendix 1 - Local Plan Consultees

### Specific consultation bodies

Affinity Water  
Association of Train Operating Companies  
Civil Aviation Authority  
East Hants County Highway Authority  
EDF Energy  
Environment Agency  
Gatwick Airport Limited  
Guildford and Waverley CCG (NHS)  
Guildford Neighbourhood Police Team  
Highways England  
Historic England  
Homes and Communities Agency  
Homes England  
Inland Waterways Association  
Marine Management Organisation  
Mayor of London  
National Air Traffic Control Service NATS  
National Grid (Wood PLC)  
Natural England  
Network Rail  
North West Surrey CCG  
Office of Rail and Road  
Office of Rail Regulation  
Openreach newsites  
Police and Crime Commissioner for Surrey  
Savills (Thames Water Utilities Ltd)  
Scotia Gas Networks  
Scotland Gas Network  
Scottish and Southern Energy Power  
Distribution  
South East Water  
South West Trains  
Surrey Downs CCG  
Surrey Heartlands CCG  
Surrey Heartlands Health Care Partnership  
Surrey Heath CCG  
Surrey Police  
Surrey Water Company  
Sussex and Surrey Police  
Sutton and East Surrey Water Company  
Thames Water  
Thames Water Property Services  
The Coal Authority  
Transport for London  
UK Power Networks  
Vodafone (cable infrastructure team)  
Vodafone (property team)  
Waldon Telecom Ltd

### County Councils

Hampshire County Council  
Surrey County Council

### LPA's

Bracknell Forest Council  
Crawley Borough Council  
East Hampshire District Council  
Elmbridge Borough Council  
Epsom and Ewell Borough Council  
Hart District Council  
Mole Valley District Council  
Reigate and Banstead District Council  
Rushmoor Borough Council  
Spelthorne Borough Council  
Surrey Heath Borough Council  
Tandridge District Council  
Waverley Borough Council  
Woking Borough Council  
Wokingham Borough Council

### Parish Councils

Abinger Parish Council  
Albury Parish Council  
Artington Parish Council  
Ash Parish Council  
Bisley Parish Council  
Bramley Parish Council  
Compton Parish Council  
Cranleigh Parish Council  
East Horsley Parish Council  
East Clandon Parish Council  
Effingham Parish Council  
Ewhurst Parish Council  
Farnham Town Council  
Godalming Town Council  
Normandy Parish Council  
Ockham Parish Council  
Peaslake Community Council  
Peper Harow Parish Council  
Pirbright Parish Council  
Puttenham Parish Council  
Ripley Parish Council  
Seale and Sands Parish Council  
Send Parish Council  
Shalford Parish Council  
Shackleford Parish Council  
Shere Parish Council  
St Martha Parish Council  
Tilford Parish Council  
Tongham Parish Council  
Wanborough Parish Council

West Horsley Parish Council  
West Clandon Parish Council  
West End Parish Council  
Wotton Parish Council  
Wonersh Parish Council  
Worplesdon Parish Council

**Neighbourhood Forum**  
Burpham Neighbourhood Forum

## **General Consultation Bodies**

1 St Saviours Beavers/Cubs/Scouts  
1st Effingham Scouts  
1st Horsley Scout Group  
1st Merrow Scout Group  
1st Ripley Beavers, Cubs, Scouts  
4-Get-Me-Nots  
5th Guildford Scout Group  
7UK Services  
A L Tozer & Tozer Seeds Ltd.  
A.J. Panzarella LLC  
A2 Dominion Housing Group Ltd  
Abacus e-Media  
Abbeylands  
Abbot's Hospital  
Abbotswood Residents Association  
ABC Group  
Abri  
Acacia Home Care  
Academy of Contemporary Music  
ACE Surrey  
ACM  
Action for Children  
Action for Links for Living (ALL)  
Active Surrey  
Adams Hendry Consulting Ltd  
ADP UK  
AECOM  
Aetna Health Inc.  
Affinity Sutton  
Affinity Sutton Homes Group  
Age Concern Blackheath  
Age Concern Surrey  
Age UK Surrey  
AGM Design Build  
Ahmadiyya Muslim Association UK  
Airport Operators Association  
Airwave Solutions Ltd  
Alan Cook Consultancy  
Albury Park Freehold  
Albury Trust  
Alcis Ltd  
Aldertons Farm Residents Company Ltd

ALDI Stores Ltd  
Alexander Dennis  
AlixPartners  
Allen Fencing  
Alliance Planning Ltd  
Allianz Insurance PLC  
Allianz Management Services Ltd  
Amazon Development Centre  
AMEC E&I UK Ltd  
AMEC Environment & Infrastructure  
Amec Foster Wheeler  
Americare CSS  
Amphibian and Reptile Conservation  
Ancient Monuments Society  
Andrew Black Consulting  
Andy Trask Designs  
Angle  
ANGLE plc  
Angus Farquhar  
APA Planning Services Ltd  
Aquarian Quest, Inc.  
Arcus Consultancy Service LTD  
Armstrong Rigg Planning  
Arnold and Baldwin  
Arriva Southern Counties  
Arriva Surrey and West Sussex  
Arthritis Care  
Arthur Waller Properties Ltd  
Arlington Walk Residents Association  
ASAP Architecture  
Asda  
Ash and farnham News & Mail  
Ash Citizens Advice Bureau  
Ash Grange County Primary School  
Ash Grange Sure Start Childrens Centre  
Ash Green Residents Association (AGRA)  
Ash Library  
Ash Manor School  
Ash Residents Association  
Ashill  
Ashill Developments  
Ashill Group  
Ashill Land Ltd  
Ashill Projects  
Aspect Ltd  
Associate Vail Williams  
Astenbell Ltd  
Aston Mead  
Avicam Homes Ltd  
Avison Young  
Aviva Investors  
B.P. Hydraulics Ltd  
B.W. Recycling, Inc.  
Badger Trust  
Bagnall Property Consulting

Balmoral Homes Ltd  
 Banks Solutions  
 Barclay Roe  
 Barlow Robbins Solicitors  
 Barnett Spooner  
 Barnwood Housing Co-operative Ltd  
 Barratt David Wilson Homes  
 Barratt Developments Plc  
 Barton Willmore LLP  
 Base Planning and Design Ltd  
 Basingstoke Canal Authority  
 Basingstoke Canal Society  
 Batcheller Monkhouse  
 Batcheller Wakefield  
 Beaufield Homes  
 Beckbridge Limited  
 Beechcroft Drive Residents Association  
 Bell Cornwell  
 Bell Cornwell LLP  
 BELLEVUE HOSPITAL  
 Bellfields Residents Association  
 Bellway  
 Belmont Preparatory School  
 Beltane Asset Management  
 Belvoir Letting Guildford  
 Bens Collectors Records  
 Berkeley Group  
 Berkeley Homes (Southern) Limited  
 Berkeley Homes (Southern) Ltd  
 Berkeley Homes Ltd  
 Berkeley Homes Southern Ltd.  
 Berkeley Strategic Land Ltd  
 BESMA  
 Bewley Homes PLC  
 Biddles  
 BIF  
 Binscombe Medical Centre  
 Biodiversity Working Group  
 Bircham Dyson Bell  
 Blackonyx Developments  
 Blackwater Valley Countryside Partnership  
 Blackwater Valley Enterprise Trust  
 Blackwater Valley Friends of the Earth  
 Blackwell Park Ltd  
 Bloor Homes  
 Blue Cedar  
 Blue Sky Performance Improvement  
 Blue Sky Planning Limited  
 BOC Limited  
 Bookham Vanguard  
 Boughton Hall Ave Residents Association  
 Bovis Homes Ltd  
 Boxgrove County Primary School  
 Boxgrove Park Residents Assoc.&Nbhd wtch  
 Boxgrove Park Residents Association  
 Boxgrove Sure Start Children's Centre  
 Boyer Planning Ltd  
 Boyer Planning Wokingham  
 Brasier Freeth Surveyors  
 BREEAM  
 Bridge End Farm, Ockham  
 British Geological Survey  
 British Horse Society  
 British Property Federation  
 British Sign & Graphics Association  
 British Toilet Association  
 British Trust - Conservation Volunteers  
 Broadway Malyan  
 Broadway Malyan Planning  
 Brook Residents Group  
 Brownies  
 Bryan Jezeph Consultancy  
 Bryan Smith Associates  
 BT Group plc  
 Buglear Bate and Co  
 Building Controls Solutions Ltd  
 Burgess International - Chartered Survey  
 Burghclere Estates LLP  
 Burneston House Dental Surgery Ltd  
 Burpham Community Association  
 Burpham Foundation Primary School  
 Burpham Neighbourhood Forum  
 Burpham Neighbourhood Plan  
 Burrows Cross Area Residents' Assoc  
 Burry and Knight  
 Bushy Hill Junior School  
 Bushy Hill Youth Club  
 Byways & Bridleways Trust  
 C & H Marketing  
 C Brewer & Sons Ltd  
 C R Toogood & Company Ltd  
 C.A.B.  
 C.P Backhurst & Co Ltd  
 CALA Homes  
 CALA Homes Southern Home Counties  
 Caldecotte Consultants  
 Camargue Ltd  
 Cameron and Cole LLP  
 Campaign for Planning Sanity  
 CAMRA Campaign for Real Ale  
 Canal & River Trust  
 Cannon Davis Commercial Interiors Ltd  
 Capgemini UK  
 Capita  
 Capita Health and Wellbeing  
 Capita Property and Infrastructure  
 Car Parking & Sustainability  
 Care for Guildford  
 Careers Support Group  
 Carers Support Guildford

Carlions Vehicle Contract  
 Carter Jonas LLP  
 Carter Planning Ltd  
 Carterwood  
 Casa Developments Ltd.  
 Cassidy Slyfield Ltd.  
 Castle Green Bowling Club  
 Castle Land and Development  
 Catesby Property Group  
 Catholic Parishes of Guildford  
 Causeway Land Investments LLP  
 CBRE Ltd  
 cctvtraining.com ltd  
 CEMEX UK Properties  
 Centaur Consulting Limited  
 CEP Associates Ltd  
 CgMs  
 CGMS Consulting  
 Charles Church Properties  
 Charles Russell LLP  
 Charlotteville Jubilee Trust  
 Charnock Environmental  
 Chelgate  
 Chemical Business Association  
 Chestnut Planning  
 Chilworth C of E Infant School  
 Chilworth2gether  
 Chinthurst Farm  
 Christ Church Guildford  
 Christ's College  
 Church of England  
 Churches Together In England  
 Circle Eight Film Group  
 Cirrus Properties  
 Citygrove  
 Civic Trust  
 CJC Wing Trust  
 CLA, Country Land & Business Association  
 Clament Limited  
 Clandon C of E Infant School  
 Clandon Regis Golf Club  
 Clifford Chance LLP  
 Clinical Comissioning Group (NHS)  
 Coast to Capital LEP  
 Cobham Conservation and Heritage Trust  
 Cobham Green Belt Group  
 Coinford Design and Build  
 Colin Smith Planning Ltd  
 Colliers CRE  
 Community Foundation for Surrey  
 Compton Village Association  
 Compton Village Club  
 Concept Developments  
 Concept2 Group  
 Conifer Developments Limited  
 Connectivity Associates Ltd  
 Consultant Supported Living  
 Council for British Archaeology  
 Council for Romany and other Travellers  
 Countryside Land and Business Assoc.  
 Countryside Properties (UK) Ltd  
 Countryside, Crest, Taylor Wimpey  
 County of Volusia  
 Courage  
 CPRE  
 CPRE Surrey  
 Craggy Island Climbing Centre  
 Cranley Road Area Residents' Association  
 Cranmore School  
 Crest Nicholson South  
 Cross Group  
 Crossroads Care Surrey  
 Crown Estate Commissioners  
 Crownhall Estates Ltd  
 CSJ Planning Consultants Ltd  
 CTC  
 Cube  
 Cubit Consulting  
 Curchods  
 Curtin&Co  
 Custom Homes  
 Cycling Embassy of Great Britain  
 Cyclists Touring Club  
 D & M Planning Limited  
 Dagero Ltd  
 Dairy Crest Group PLC  
 Dairy Crest Ltd  
 Dalton Warner Davis LLP  
 Damarel System International Ltd  
 Dan  
 Dandara Ltd  
 David J Archer Company Ltd  
 David Lock Associates  
 David Ogilvie Design  
 Davis Langdon  
 Davis Planning  
 Day Group Ltd.  
 DC Planning Ltd  
 Dean Lewis Estates  
 Deeprise Engineering Ltd  
 Defence Infrastructure Organisation  
 DEFRA  
 Deloitte LLP  
 Deloitte Real Estate  
 Dental Practice Guildford  
 Dentons  
 Department for Education  
 Dept Culture Media and Sport  
 Derbyshire Gypsy Liason Group  
 Derek Horne & Associates Ltd

Design Analysis Partnership  
 Design Council  
 Design South East  
 Designhive  
 Development Plan Services  
 Development Planning Consultants  
 DHA Planning  
 Diabetes Society  
 Dialogue  
 Diocese of Arundel and Brighton  
 Diocese of Guildford  
 Direct Design  
 Disability Alliance and Network  
 Disability Challengers  
 Disabled Motoring UK  
 Disabled Persons Railcard Office  
 District Councils Network  
 DLP Planning Consultants  
 DMH Stallard LLP  
 Dolphin Networks  
 Downsedge Residents' Association  
 Downside & Hatchford Village Hall  
 Downton Homes  
 Dowsett Mayhew  
 DP9  
 DPDS Consulting Group  
 DPDS Regional Ltd  
 DPP Ltd  
 Dray Court  
 Drayton House School  
 Drivers Jonas  
 Drivers Jonas Deloitte  
 DTZ Consulting  
 DTZ on behalf of Royal Mail  
 DTZ Piedad Consulting  
 EAD  
 Eadie, McFarland & Co. Est. 1971  
 East Guildford Residents Association  
 ECA Architecture and Planning  
 Eden Park  
 Edge 4 Planning Limited  
 Education and Skills Funding Agency  
 Education Funding Agency  
 Edward Caush & Associates  
 Edward Kingston Ltd  
 Edwin Road Residents Association  
 Effingham Residents' Association  
 Effingham Residents Co Ltd  
 Effingham Village Plan  
 Effingham Village Recreation Trust  
 Ellmer Construction (HQ)  
 Ellwood Art  
 Elmhurst hospital  
 Emmanuel Church  
 Employment Services Partnership  
 Engel Construction  
 Engineering  
 English Rural HA  
 Enterprise & Growth, University of Surrey  
 Enterprise First  
 Enterprise M3  
 Environet UK Ltd  
 ES group  
 ESP Global Services  
 Evolve Dynamics  
 Experience Guildford  
 Explore Learning Ltd  
 Exploring Surrey's Past  
 Fairlands Players  
 Fairlands, Liddington Hall and Gravetts Lane  
 Community Association  
 Fairview New Homes Limited  
 Farming and Wildlife Advisory Group  
 Farmline  
 FAT(Food and Thought)Young Adult's Group  
 FCP  
 Federation of Small Businesses  
 Fields Behind Shalford Village Hall Pres  
 Fields in Trust  
 Finch  
 Fire & Rescue  
 First Merrow Scout Group  
 First Regional Estates Ltd  
 First Wessex  
 First Wessex Housing Group  
 Firstplan  
 FLAG/FLGCA  
 FLGCA  
 Foddy Consult  
 Footsteps Registered Charity  
 Forestry Commission  
 Forsters LLP  
 Foxtons  
 Frank Taylor Planning  
 Free Running Group  
 Freight Transport Association  
 Friends International Guildford  
 Friends of Effingham Common  
 Friends of Normandy Wildlife  
 Friends of the Earth  
 Friends of the Hurtwood  
 Friends, Families and Travellers  
 Furze Hill Residents Association  
 Fusion Online Limited  
 Fusion Online Ltd  
 Futura Medical plc  
 Future Create  
 Future Planning and Development  
 G Live/Town Centre Forum  
 G R Planning Consultancy Ltd

G4 residents association  
 GACC  
 Garden Hopper  
 Gardens trust  
 Gardiner & Associates  
 Garlick's Arch Ltd  
 Gascoignes  
 Gateway TSP  
 G-BUG: Guildford Bike User Group  
 GCP Capital Partners LLP  
 Genesis Town Planning Ltd  
 George Abbot School  
 Gerald Eve LLP  
 Gerry Lytle Associates Architects  
 Gerry Lytle Associates Ltd  
 Ginger Townplanning  
 Girl Guiding Surrey West  
 GL Hearn Limited  
 Gladman Developments Ltd  
 Glaston Hill Farms Ltd  
 Gleeson Developments Ltd  
 Gleeson Land  
 Gleeson Strategic Land  
 Glesesk School  
 Goadsby and Harding Commercial  
 Godalming College  
 Godfrey Chappels Ltd  
 Godstone Highway Depot  
 GoinGreen  
 Gosden House School  
 Grant Consultancy  
 Greater London Authority  
 Green Issues Communications  
 Green Issues Communique  
 Green Reach Limited  
 Greenacre & Co  
 Greencroft Residents Association  
 Greenoak Housing Association  
 Gregory Gray Associates  
 Grenke Leasing Ltd  
 Grillo LLP  
 Grove Heath North Residents Association  
 GRPlanning  
 Guide Dogs  
 Guide Dogs for the Blind  
 Guildbury  
 Guildford & Godalming Athletic Club  
 Guildford & Waverley Care & Repair  
 Guildford Access Group  
 Guildford Action  
 Guildford Action for Community Care  
 Guildford Adult Learning Centre  
 Guildford Allotments Society  
 Guildford and District Jewish Community  
 Guildford and Godalming Interfaith Forum  
 Guildford and Godalming Wayfarers  
 Guildford Angling Society  
 Guildford Arabic Education Centre  
 Guildford Art Society  
 Guildford Arts  
 Guildford Baptist Church  
 Guildford Boat House  
 Guildford Borough Council (Economic Development)  
 Guildford Borough Council/Access group  
 Guildford Bowling Club  
 Guildford Business Forum  
 Guildford Business Forum Rural Group  
 Guildford Cathedral  
 Guildford Cathedral Church of Holy Spirit  
 Guildford Chamber of Commerce  
 Guildford Children's Centre  
 Guildford Citizens Advice Bureau  
 Guildford City Cricket Club  
 Guildford City FC  
 Guildford City Football Club  
 Guildford College  
 Guildford College Group  
 Guildford College of Further and Higher  
 Guildford Community Church  
 Guildford Community Family Trust  
 Guildford County Court  
 Guildford County School  
 Guildford Cricket Club  
 Guildford Cycle Forum  
 Guildford Dental Practice  
 Guildford Diocese  
 Guildford Diocese Education  
 Guildford Divisional Police  
 Guildford East Scout District  
 Guildford East Scouts  
 Guildford Environmental Forum  
 Guildford Freiburg Association  
 Guildford Goldhawks Basketball Club  
 Guildford Golf Club  
 Guildford Green Belt Group  
 Guildford Grove Children Centre  
 Guildford Grove Primary School  
 Guildford Hard of Hearing Support Group  
 Guildford High School for Girls  
 Guildford Holiday Fun  
 Guildford Homestay  
 Guildford Institute  
 Guildford Labour Party  
 Guildford Lions Club  
 Guildford Mental Health Consortium  
 Guildford Methodist Church  
 Guildford Motor Club  
 Guildford Nepalese Community  
 Guildford Orthodontics

Guildford Park Community Church  
 Guildford Poyle Charities  
 Guildford Private Renters Association  
 Guildford Pubwatch  
 Guildford Rambling Club  
 Guildford Residents Association, EGRA  
 Guildford Rowing Club  
 Guildford Rugby Club  
 Guildford Schools and Sport  
 Guildford Scout Council  
 Guildford Shakespeare Company Trust  
 Guildford Society  
 Guildford Society (planning)  
 Guildford Society / St Catherines Association  
 Guildford Society Position Paper  
 Guildford Sunset Homes  
 Guildford Theatre School  
 Guildford United Reformed Church  
 Guildford Vision Group  
 Guildford Voluntary Service/Action  
 Guildford Ying Wah Chinese School  
 Guildford YMCA  
 Guildford Youth Council  
 Guildford, Woking & Waverley FoE  
 Guildfordians Rugby Club  
 Guildowns Group Practice  
 GVA  
 GVA Grimley Ltd  
 H.C. Webb Estates Ltd  
 Hallam Land Management Ltd  
 Halow Project  
 Harestone RDP  
 Harlequin Group  
 Hart Builders  
 Harvey Water Softeners Ltd  
 Headway Surrey  
 Healthwatch Surrey  
 Heart Wood Wealth  
 Heathrow Airport  
 HECS  
 Hedleys Solicitors  
 Heine Planning  
 Henry Dolan & Associates Communications  
 Heritage Property Services  
 Hermes Investment Management  
 HGH Consulting  
 Highwood Group  
 Hillier Almshouses  
 Hi-speed Services LTD  
 HLR Consulting Ltd  
 HM Revenue & Customs  
 Holly Lodge County Primary School  
 Holmbury Cricket Club  
 Holmbury Playgroup  
 Holmbury St. Mary Holmbury Parish News  
 Holmbury Village Hall  
 Holmwood Close Residents Association  
 Holy Trinity Amenity Group  
 Holy Trinity Church  
 Holy Trinity Housing Association Ltd  
 Holy Trinity Junior School  
 Home Builders Federation  
 Home Group Housing Association Ltd  
 Home Group Ltd  
 Homeowner  
 Home-Start Guildford  
 Hoopers Probate genealogists  
 Hope Church  
 Horsley Countryside Preservation Society  
 Horsley Sports Club  
 House of Fraser  
 Houston Morris Architects  
 Howard Hutton & Associates  
 Howard of Effingham School  
 Howmanyhomes.org  
 HRG Worldwide  
 Hungarian Cultural Group Guildford  
 Hunt Kendall  
 Hunter Page Planning  
 Huntington's Disease Association  
 Hyder Consulting  
 i-Bid  
 i-build  
 Icení Projects Ltd  
 Indigo Planning Limited  
 individual  
 Information Strategies  
 Inland Homes  
 Insight Town Planning Limited  
 Institute of Directors  
 InterCall  
 Interviewing Services  
 Interviewing Services Ltd  
 IoD Surrey  
 Irish Traveller Movement in Britain  
 Islamic Society  
 Islamic Welfare Association of Surrey  
 IWA Guildford & Reading Branch  
 Jacob's Well Residents' Association  
 Januarys  
 JB Planning Associates (for Countryside Properties)  
 JB Planning Associates  
 JDC  
 Jencar Engineering  
 Jewel Consulting Ltd  
 Jillings Hutton Planning  
 JMN Developments  
 Jobcentre Plus  
 John Arnold

John Cooper Associates  
 John Moore Trust  
 Johns Associates Ltd  
 Joining In: Men's Group  
 Jones Day  
 Jones Lang LaSalle  
 JPC Consultants  
 Judith Ashton Associates  
 just a resident  
 Kahootz  
 Kalon Biological Ltd  
 Kebell Development Ltd  
 kendall Cars  
 Kennet Properties (Thames Water)  
 Kennet Properties Limited  
 Kentucky Fried Chicken (GB) Limited  
 Keystone Legal  
 Kiely Planning Limited  
 Kier Group Plc  
 Kings College for the Arts & Technology  
 Kirkwells Town Planning  
 Kirkwood Care Ltd  
 Kitewood Estates  
 Knightsbridge Property Development Corp  
 Kossway  
 Lacey Simmons Ltd  
 Ladywell Convent  
 Laing Homes South West Thames  
 Lambert Smith Hampton  
 Land Securities  
 Land to the East of White Lane, Ash  
 Landowners Consortium Wisley  
 Lanesborough Prep School  
 Lanesborough Preparatory School  
 Langdale Planning  
 Langham Homes  
 Lanpro Ltd  
 Larkspur Art Specialists  
 Latchmere Properties Ltd  
 Latham Interiors  
 Lawn Tennis Association  
 Legal & General  
 Leigh & Glennie Ltd  
 Leith Planning  
 Levvel Consulting Ltd  
 Lichfields  
 Lightwood Property  
 Lightwood Strategic  
 Lilly UK  
 Line Planning  
 Lionhead Studios  
 Ilanaway Investments  
 Lo  
 Loates-Taylor Shannon Architects  
 Local Care Group  
 Local Government Association  
 Lockrite  
 Lockwood Day Centre  
 London & Hampton Developments  
 London & Scottish International Ltd  
 Long term care  
 Love Interiors  
 LPD Projects Ltd  
 LRM Planning Ltd  
 Lucas Design  
 Lucas Land and Planning  
 Luken Beck  
 Lynx Hill Residents' Association  
 Lysons & Sleeman & hoare Ltd Architects  
 M & G Real Estate  
 Macfarlane + Associates Ltd  
 MacGarvie and Co Ltd  
 Maddox and Associates  
 Maddox Associates  
 Mandolay Hotel  
 Marks and Spencer  
 Markwell & Markwell  
 Martin Grant Homes  
 Martineau  
 Mast Sanity  
 Maven Plan  
 Mayer Brown  
 McCloskey & Bingham  
 McConnell Planning  
 Medpharm Ltd  
 Meeting Point (Social Group for 50+)  
 Member of Parliament  
 Mera Management  
 Mercer Real Estate Partners  
 Mercy Medical Center  
 Merrow C of E Infant School  
 Merrow Dramatic Society  
 Merrow Methodist Church  
 Merrow Residents' Association  
 Merrow Village Club & Hall  
 MGA  
 Michael Conoley Associates  
 Michael Shanly Homes  
 Michael Williams Planning  
 Miller Developments  
 Millgate Developments Ltd  
 Millmead Court  
 Ministry of Defence  
 Ministry of Justice  
 Mitchell Evans Partnership  
 MJ Gleeson  
 MK IP Works LTD  
 Moat  
 Mobile Operators Association Ltd  
 Mole Valley Liberal Democrats



Monday Chat  
 Mono consultants Ltd  
 Montagu Evans LLP  
 Morgan Crucible  
 Morrison Supermarkets  
 Mothers' Union  
 Motion Transport Planning  
 Mott MacDonald  
 Mount Alvernia Hospital  
 Mount Green Housing Association  
 MRPP Planning  
 MTS Health Limited  
 Mulberry Property Investment Limited  
 Munrostudios  
 Munrostudios CGI  
 Musgrave Retail Partners GB  
 MVA Consultancy  
 N Giles Ltd  
 NaCSBA  
 Nathaniel Lichfield & Partners  
 National Bat Helpline  
 National Federation of Gypsy Liaison Gro  
 National Federation-Housing Associations  
 National Gardens Scheme Charitable Trust  
 National Planning Forum  
 National Rifle Association  
 National Small Bore Rifle Association  
 National Trust  
 Neame Sutton Limited  
 Neighbourhood Planning  
 Neighbourhood Watch  
 Neonova Design  
 New Earth Solutions  
 New Hope Centre  
 New Life Baptist Church  
 Newark Lane Residents Association  
 Newcourt Residential  
 Newman Davis & Company  
 Newship Group  
 Nexus Planning Ltd  
 NFU  
 NFU South East Region  
 NHS  
 NHS - Surrey and Sussex Area Team  
 NHS England - Hampshire Area Team  
 NHS England South  
 NHS Guildford and Waverley CCG  
 NHS Property Services Ltd  
 NHS Surrey and Sussex Area Team  
 Nichecom  
 Nicholas James Group  
 NLP Planning  
 No. 5 Chambers  
 No. 5 Project  
 Normandy Action Group  
 Normandy United Reformed Church  
 Norrells Drive Pte Ltd  
 Norrells Drive Association  
 North Wyke Farm, Normandy  
 Northmead Junior School  
 Northumberland Estates  
 NTR Planning  
 Number Five Project  
 NYU Hospitals Center  
 NYU Medical Center  
 Oades Plant Hire  
 Obsidian Lands Promotion (Guildford) Ltd  
 Obsidian Strategic  
 Ockham & Hatchford Residents Association  
 One Efficiency  
 Online imaging  
 Onslow County Infant School  
 Onslow Village Residents Association  
 Open Spaces Society  
 OptimEyes-UK  
 Orchard Rd residents group  
 Orestan Land Ltd.  
 OSP Architecture  
 Our Place @ Bellfields Yth & Comnty Ctr  
 Outline - Gay Lesbian  
 Owen Shipp Commercial  
 Owen Shipp Surveys  
 Owner Land West of Normandy  
 P&DG  
 PACE CNY  
 Paint Ball Games  
 Pakistan Muslim Welfare Association  
 Panchentric Digital  
 Pannell Kerr Forster  
 Paradigm Planning Ltd  
 Park Barn & Westborough Community Assoc  
 Park Barn Centre  
 Parkinsons UK  
 Parkwood Consultancy Services  
 Parkwood House  
 Parsons Brinckerhoff Ltd  
 Partners of Loseley Park  
 Pathfinder Project Consultancy Limited  
 Paton Development  
 Paul Dickinson & Associates  
 Paul Newman Property Consultant  
 Paul Winter & Co - Specialist Planning L  
 Peacock and Smith  
 Peaslake Community Fund  
 Peaslake School  
 Peck Properties  
 Pegasus Group  
 Pegasus Planning Group  
 Pelham Planning Associates Ltd  
 Penningtons Manches LLP

Perry Hill Ward Residents Association  
 Persimmon Homes Ltd.  
 Persimmon Homes Thames Valley  
 Peter Brett Associates  
 Peter Pendleton & Associates Ltd  
 Peveril Securities  
 Pewley Down Conservation Volunteers  
 Pewley Down Infant School  
 P-Fava.Consulting  
 Pharmacomm  
 PHFCE  
 Phillip Sears Designs  
 Phillips Planning Services Ltd  
 Phyllis Tuckwell Hospice  
 Pinders  
 Pinewood Group  
 Pirbright Laboratory  
 Pirbright Village Primary School  
 Places for People  
 PlanInfo  
 Planit Consulting  
 Planning and Design Group (UK) Ltd.  
 Planning Inspectorate  
 Planning Issues  
 Planning Magazine  
 Planning Perspectives LLP  
 Planning Potential  
 Plant Heritage  
 Plantation Cafe  
 Planview Planning Ltd  
 Planware Ltd  
 Pleydell Smithyman Limited  
 Police Station  
 Pond Meadow Special School  
 Porta Planning  
 Portal Planning  
 Power Race Graphics  
 Poyle Road Campaign Group  
 PPA  
 Printing House Sq. Residents Association  
 Priors Field School  
 Profesional Driving Services  
 Project Oasis North Downs  
 Propernomics  
 Property Consultant  
 Property Transfer Co-ordination  
 Protect Clandon Group  
 PRP  
 PTS of Westchester  
 Puttenham Church of England School  
 Puttenham Golf Club Ltd  
 Q+A Planning Ltd  
 Qinetiq Ltd  
 Qualidigm  
 Quartzelec  
 Queen Eleanor's C of E Junior School  
 Queen Elizabeth Park Residents Assoc.  
 Quod Planning  
 Radian  
 Radian Housing Group windsor  
 Raglan Housing Association  
 Ramblers Association  
 Ramsey  
 Rapleys LLP  
 Recycling company  
 Red Clam Ltd  
 Red Hot Yoga Ltd  
 Redrow  
 Reflected Reality  
 Regulatory Services, Guildford Borough Council  
 Renaissance Classics  
 Rentwood Resource Centre  
 Reside Developments Ltd  
 Residents Association Beechcroft Drive  
 Retired Historian, but still active as v  
 Reve pavilion Natural Health Clinic  
 rg+p Ltd.  
 RGJE Ltd  
 RGP- Transport Planning & Infrastructure  
 Richard Bonny Architectural Design  
 Ripley C of E Infant School  
 Ripley Carriage Ltd  
 Ripley Court Educational Trust  
 Ripley Court School  
 Riverside echg  
 Road Haulage Association  
 Robinson Escott Planning LLP  
 Rokers  
 Roland Way MCIAT  
 Romans, Land and Development  
 Rookwood Residents Association  
 Roseacre Gardens Residents Assoc.  
 Rosebery Housing Association  
 Rosemary Simmons Housing Association  
 Rotary  
 Rowen Properties  
 Royal Automobile Club  
 Royal British Legion  
 Royal British Legion Industries  
 Royal Grammar School  
 Royal Horticultural Society  
 Royal Mail  
 Royal Mail (Cushman & Wakefield)  
 Royal Society for the Protection of Birds  
 Royal Surrey County Hospital  
 RPS - Planning, Transport & Environment  
 RPS Planning & Development  
 RPS Plc  
 RSPB  
 RSPB South East Office

RT Design  
 Rubix Estates  
 Rural Group  
 Rural Solutions  
 Ruston Planning Limited  
 RVS Onward Stroke Club Guildford  
 Ryde Farm Estate  
 Rydes Hill Convent Prep School  
 Rydon  
 Rydon Homes Ltd  
 Safeguard Coaches Ltd  
 Sainsbury's Supermarkets Ltd.  
 Sallie Hair and Beauty  
 Salvation Army  
 Sanctuary  
 Sandfield County Primary School  
 SANG SOLUTIONS  
 Sanitrox Ltd.  
 Sanofi Aventis  
 Sansom Centre (MS)  
 Sapphire Asset Management  
 Save Hog's Back Campaign  
 Save Send Action Group  
 Save the Children UK  
 Saversminimart  
 Savills (UK) Ltd  
 Savills Planning  
 SCC Adult Services  
 SCC Youth Development Service  
 Schofield Lothian  
 Scott Brownrigg  
 Scott Brownrigg Planning  
 Scott Planning Associates  
 Scott Wilson  
 SE Coast Ambulance Service  
 Seale and Sands Royal British Legion  
 Send C of E Infant School  
 Send Parish Church  
 Send Village Online  
 Seniors Lunch Club  
 Sentinel Builders  
 Seven Signs  
 Seymour Estate Agents  
 Seymours Guildford  
 SGN  
 Shalford Conservation Society  
 Shalford Infant School  
 Shalford Village Bowling Club  
 Shalford Village Hall  
 Shanly Homes  
 Shawfield County Primary School  
 Shawfield Day Centre  
 SHCCG  
 Shelter  
 Shere & Peaslake Scout Group  
 Shere C of E Infant School  
 Shere Manor Estate  
 Shft  
 SHIFA  
 Shipleys LLP  
 Showman  
 Showmans Guild of Great Britain  
 Shrimplin Brown  
 Shrimplin Planning & Development  
 Sight for Surrey  
 Sigmet Planning  
 Simmons & Sons  
 Simply Planning  
 SITA  
 SITEC  
 Skills Funding Agency  
 Sladen Estates Ltd  
 Smith & Williamson  
 Smiths Gore  
 Snaky Lane Community Wildlife Group  
 Social and Recreational Project  
 Society f/t Protection of Ancient Buildings  
 Solum Regeneration  
 Solve Planning  
 Soughton Properties Limited  
 South Downs National Park Authority  
 South East Coast Ambulance Service  
 South East Planning Aid  
 South East Water c/o Adams Hendry Const  
 South East Water Ltd  
 South West Trains  
 Southern Gas Networks  
 Southern Planning Practice  
 Southern Water  
 Sovereign  
 sp2 Consulting Limited  
 Sparks - Land & Development  
 Special Products  
 Sport and Recreation Alliance  
 Sport England  
 Sports Council South East Region  
 Squires Garden Centres  
 Squires Planning  
 SSA Planning Limited  
 St Bede's C of E Junior School  
 St Catherine's School  
 St Catherines Village Association  
 St Clare's Church  
 St Franics Rectory  
 St John the Evangelists Church  
 St John's Ambulance County HQ Brigade  
 St John's Seminary  
 St Josephs Catholic Primary School  
 St Joseph's Church  
 St Joseph's RC Junior School

St Mark's Church Wyke  
 St Mary C of E Church  
 St Mary's C of E Infant School  
 St Mary's Church  
 St Nicolas C of E Infant School  
 St Nicolas' Church  
 St Paul's C of E Infant School  
 St Peter's Catholic Comprehensive School  
 St Peters School Mellow  
 St Peter's Shared Church  
 St Saviours Church & Centre  
 St Teresa's Prep School  
 St Thomas of Canterbury Catholic Primary  
 St. Catherines' Village Association  
 St. Luke's Park Residents Association  
 St. Modwen Properties PLC  
 St. Peters Shared Church  
 Stagecoach  
 Stagecoach Guildford  
 Stagecoach Guildford North  
 Stamford Associates Limited  
 Star Oyster  
 Status Environmental Limited  
 Steer Davies Gleave  
 Stellco Developments Ltd  
 Stevens and Bolton LLP  
 Stocton Road Residents Association  
 Stoke next Guildford Residents Associati  
 Stoughton Action Group  
 Stoughton Infant School  
 Stoughton Youth Centre  
 Strategic Aviation Special InterestGroup  
 Strategic Planning Advice Ltd  
 Strathmoor Developments Limited  
 Streetcar  
 Strutt & Parker LLP  
 Stuart Hicks Design Services  
 Super Camps  
 Supergonk  
 Surrey Advertiser Ltd  
 Surrey Amphibian and Reptile Group  
 Surrey Archeological Society  
 Surrey Army Cadet Force  
 Surrey Association for Visually Impared  
 Surrey Badger Protection Society  
 Surrey Bat Group  
 Surrey Chambers of Commerce  
 Surrey Coalition of Disabled People  
 Surrey Community Action  
 Surrey Connects  
 Surrey Countryside Access Forum  
 Surrey County Council Education (Secondary)  
 Surrey County Council Public Health  
 Surrey County Playing fields Association  
 Surrey Economic Partnership  
 Surrey Education Business Partnership  
 Surrey Federation of W.I's  
 Surrey Fire and Rescue Service  
 Surrey Gardens Trust  
 Surrey Gypsy Traveller Communities Forum  
 Surrey Hampshire Borders CAMRA  
 Surrey Hants Borders Branch CAMRA  
 Surrey Heathland Project  
 Surrey Hills AONB  
 Surrey Hills Conservation Volunteers  
 Surrey Hills Enterprises  
 Surrey Historical Association  
 Surrey History Service  
 Surrey Independent Living Council  
 Surrey Industrial History Group  
 Surrey Islamic Society, Surrey Universit  
 Surrey Law Society  
 Surrey Minority Ethnic Forum  
 Surrey Museums Consultative Committee  
 Surrey Nature Partnership  
 Surrey Playing Fields  
 Surrey Police's Lesbian & Gay  
 Surrey Quality Leisure Services  
 Surrey Satellite Technology Ltd  
 Surrey Scouts  
 Surrey Sports Park  
 Surrey Traveller Community Relations  
 Surrey Wildlife Trust  
 Surrey Women's Aid  
 Surrey Young Farmers Clubs  
 Surrey Youth Focus  
 Surya Hotels Ltd  
 Sustainable Land PLC  
 Sustainable Land Products Limited  
 SVM- Building Services Design  
 SWT Countryside Services Ltd  
 Synergy - Construction and Property  
 Consultants  
 Talk Surrey - Stroke Recovery  
 Tanner Tilley  
 Taylor Wimpey plc  
 Taylor Wimpey South West Thames Ltd  
 Taylor Wimpey Strategic Land  
 Tenet Health System  
 Terence O'Rourke for M&G Real Estate  
 Terence O'Rourke Ltd  
 Terence O'Rourke Ltd for M&G Real Estate  
 Tesni  
 Tetlow King Planning  
 Tetra Tech Planning  
 TGCG  
 Thai Terrace Restaurant  
 Thakeham Homes  
 Thakeham Homes Ltd  
 The Auto-Cycle Union Limited

The Bahai Community of Guildford  
 The Barn Youth Project  
 The Barn, Effingham  
 The Bat Conservation Trust  
 The Boilerroom  
 The Cafe  
 The Celia Cross Greyhound Trust  
 The Chine Consultancy Advice Ltd  
 The Church of St. John the Evangelist  
 The Clandon Society  
 The Conservation Studio  
 The Co-operative Group  
 The Co-operative Group and Scape Living  
 The Court Residents Association  
 The Deltic group  
 The Disabled Persons Transport  
 The Electric Theatre  
 The Fairlands Practice  
 The Forum of Mobility Centres  
 The Friary  
 The Georgian Group  
 The Glass and Knob Connection  
 The Good Intent Public House  
 The Guildford Institute  
 The Guildford Society  
 The Gypsy Council  
 The Herald Players  
 The House Group  
 The House of Commons  
 The Howard Partnership Trust  
 The Learning Corporation LLP  
 The Lifetrain Trust  
 The London Green Belt Council  
 The Losely Estate  
 The Mandolay Hotel  
 The Matrix Trust  
 The Milestone Society  
 The Motor Neurone Disease Association  
 The National Trust  
 The National Trust - London and SE  
 The Nomads  
 The Northumberland Estates  
 The Nuance Group UK Ltd  
 The Pirbright Institute  
 The Planning Bureau Ltd  
 The Planning Bureau Ltd (for McC&Stone)  
 The Planning Inspectorate  
 The Raleigh School  
 The Ripley Society  
 The RSPB  
 The Shah Jahan Mosque  
 The Showmen's Guild of Great Britain  
 The Spinney Sure Start Children's Centre  
 The Student Health Centre  
 The Surrey and Hampshire Canal Society  
 The Surrey Hills Board  
 The Surrey Hills Society  
 The Theatres Trust  
 The Trustee's of the Tyman Pension Scheme  
 The Twentieth Century Society  
 The Tyman Pension Scheme  
 The University of Surrey Students' Union  
 The University of The Third Age  
 The Victorian Society  
 The Wey and Arun Canal Trust  
 The Wilky Group  
 The Willows  
 The Woodland Trust  
 The York Road Project  
 Theatres Trust  
 Theatretrain  
 Three Valleys Water  
 Tibbalds Planning and Urban Design  
 Tillingbourne Junior School  
 Tilthams Green Residents Association  
 TMA Chartered Surveyors  
 Tongham Community  
 Tongham Scout Group  
 Tongham Wood Improvement Group  
 Tormead School  
 Tourism South East  
 Towers Watson  
 Town Centre Chaplaincy  
 Town Centre Signage Group  
 Town Planning Bureau  
 Tozer Seeds Ltd  
 Trans Lease Services  
 Transform Housing & Support  
 Traveller Law Reform Project  
 Travellers' Times  
 TREG Consulting  
 Tribal MJP  
 Troy Planning and Design  
 TSG Consulting  
 Tudor Cottage  
 Tudors  
 Tunsgate Square Shop  
 Turley  
 Turley (for land securities)  
 Tyman Pension Scheme  
 Tyting Society  
 UCA  
 UK Association of Preservation Trusts  
 UKIP Woking Branch  
 UNICHEM LTD  
 Union4 Planning  
 UniS LGBT+ Society  
 Universities Superannuation Scheme Ltd.  
 University of Surrey  
 University of Surrey Students Union

University of Turin  
 Unlimited Mind  
 Unofficial Onslow Village Website  
 Urban Saints Youth Group  
 Urbangroup Property Development  
 Vail Williams LLP  
 Vail Williams LLP (for Thakeham Homes)  
 Vaughan House, Hostel for Men and Women  
 VC Godalming Haslemere - Surrey Hills  
 Verve Planning  
 Vincent Homes - Bespoke New Housing  
 Vincent Knight  
 Vinci Construction  
 Virgin Media  
 Vision Engineering Ltd  
 Vision for Guildford Ltd - GVG  
 Visionhall Information Systems Ltd  
 Visit Britain  
 Visit Surrey CIC  
 Voluntary Action South West Surrey  
 Volunteer Centre Ash  
 Volunteer Centre Guildford  
 Vortal Properties Ltd  
 W. DAVIES solicitors  
 WAAG  
 Waitrose Ltd  
 WallMates ltd  
 Ward Member for Burpham  
 WASHA  
 Waterden Dental Practice  
 Watkin Jones Group  
 WBDRA.  
 Welbeck Land  
 West Surrey Badger Group  
 West Surrey Divisional Commander  
 West Waddy ADP  
 Westborough & District Residents Org.  
 Westfield (Friary Centre)  
 Wey & Arun Canal Trust  
 Wey and Arun Canal  
 Wey Estates Ltd  
 Wey House School

Wey Valley Indoor Bowling Club  
 Weyfield Primary Academy  
 Weyfield Residents Association  
 Weymount Neighbourhood Group  
 White and Sons  
 White Lion Walk Centre Manager  
 White Young Green PlanningWhitmoor  
 Common Association  
 Williams Brothers  
 Williams Property Management  
 Windacres Ltd (residents)  
 Wisley Action Group  
 Wisley Property Investments Ltd  
 Woking College  
 Wokingham Borough Council  
 Wood E&I Solutions UK Ltd  
 Wood Plc  
 Wood Street County Infant School  
 Wood Street Village Association  
 Woodcock Bros Wimbledon Limited  
 Woodhams - Family Trees  
 Woodlands Park Residents Association  
 Woodstreet Village Association  
 Woolf Bond Planning  
 Working Property Ltd  
 Worplesdon and District Bridleways Assoc  
 Worplesdon County Primary School  
 WS Planning  
 WS Planning & Architecture  
 WSP  
 WYG Environmental Planning Transport Lim  
 WYG Group  
 WYG Limited  
 WYG Planning  
 Wyke Primary School  
 Wynngate  
 YMCA  
 Yomen Club  
 Yvonne Arnaud youth Theatre  
 Zinchome Limited

We also notified all other residents, business owners and other stakeholders on our database who have asked to be notified of future Local Plan consultations. Approximately 3,000 emails were sent out, and 35 letters.

## Appendix 2 – Duty to Cooperate Confirmation Emails

Appendix 2 contains copies of the email exchanges with the Neighbouring Authorities and Prescribed Bodies confirming there are no strategic cross boundary issues resulting from the LPDMP and therefore it is not necessary to agree any statements of common grounds. The Neighbouring Authorities and Prescribed Bodies are listed below.

### Neighbouring Authorities:

- Elmbridge Borough Council
- Mole Valley District Council
- Rushmoor Borough Council
- Surrey Heath Borough Council
- Waverley Borough Council
- Woking Borough Council

### Prescribed Bodies:

- Environment Agency
- Highways England
- Historic England
- Natural England
- Surrey County Council
- Surrey Nature Partnership

# Neighbouring Authorities

## Elmbridge Borough Council

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Guildford BC duty to cooperate [UNC]  
**Date:** 22 October 2021 10:17:06

**Attachments:**  
[ima](#)  
[ge001.png](#)  
[image002.jp](#)  
[g](#)  
[Draft\\_Reg\\_19\\_Local\\_Plan\\_development\\_management\\_policies.pdf](#)

---

Dear [REDACTED],

Thank you for your email regarding the draft Regulation 19 version of the Guildford Local Plan: development management policies.

Having reviewed the draft document, I can confirm that we are of the view that the draft Regulation 19 version of the Local Plan: development management policies does not raise issues of a strategic cross-boundary nature and that a statement of common ground between Guildford Borough Council and Elmbridge Borough Council is not required in relation to this proposed development plan document.

We look forward to receiving notification of your Regulation 19 representation

period. Kind regards,

[REDACTED]

[REDACTED] | Planning Policy & Strategy Manager | Planning Policy & Strategy Team [REDACTED] | elmbridge.gov.uk

Elmbridge Borough Council, Civic Centre, High Street, Esher, Surrey, KT10 9SD

02 - Help us help you 





**From:** [REDACTED]

**Sent:** 05 October 2021 15:37

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Guildford BC duty to cooperate [UNC]

\*FAO Planning Policy Team\*

Dear Elmbridge Borough Council,

We are currently in the process of finalising the Regulation 19 version of the Local Plan: development management policies. This forms the second part of our Local Plan and follows on from the adopted Local Plan: strategy and sites (2019). Should you wish to see the scope and content, please see attached the draft version that recently went to the Joint Executive Advisory Board committee. As this document only comprises the more detailed development management policies, we do not consider that it results in any cross boundary issues upon which we need to cooperate on or agree a statement of common ground in relation to. However we would welcome your confirmation regarding this assessment. Please could you confirm that you share this opinion or, if you disagree and consider that it does raise cross boundary issues that require cooperation, please could you indicate which policies and issues these relate to.

We are intending to hold our Regulation 19 consultation following our Council meeting on 1 November. This will of course provide you with an opportunity to comment on the actual policies should you wish to do so.

We look forward to receiving your reply - if possible please could you reply by

22 October. Kind regards,

Planning Policy Team Guildford Borough Council

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DRAFT

## Mole Valley District Council

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: [EXTERNAL] RE: Guildford BC duty to cooperate [UNC]  
**Date:** 07 October 2021 10:30:58

---

Dear Sir or Madam,

We can confirm that we are of the view that the *draft Regulation 19 version of the Local Plan: development management policies* does not raise issues of a strategic cross-boundary nature and that a statement of common ground between Guildford Borough Council and Mole Valley District Council is not required in relation to this proposed development plan document.

Kind regards,

[REDACTED] | Planning Officer | Planning Policy Team

---

Mole Valley District Council, Pippbrook, Dorking, Surrey, RH4  
1SJ Email: [REDACTED] | Web:  
[www.molevalley.gov.uk](http://www.molevalley.gov.uk)

---

**From:** [REDACTED]  
**Sent:** 05 October 2021 15:38  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** [EXTERNAL] RE: Guildford BC duty to cooperate [UNC]

**Warning: email from outside of MVDC - if in any doubt do not open links or attachments, or carry out requested actions**

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Dear Mole Valley Borough Council,

We are currently in the process of finalising the Regulation 19 version of the Local Plan: development management policies. This forms the second part of our Local Plan and follows on from the adopted Local Plan: strategy and sites (2019). Should you wish to see the scope and content, please see attached the draft version that recently went to the Joint Executive Advisory Board committee. As this document only comprises the more detailed development management policies, we do not consider that it results in any cross boundary issues upon which we need to cooperate on or agree a statement of

common ground in relation to. However we would welcome your confirmation regarding this assessment. Please could you confirm that you share this opinion or, if you disagree and consider that it does raise cross boundary issues that require cooperation, please could you indicate which policies and issues these relate to.

We are intending to hold our Regulation 19 consultation following our Council meeting on 1 November. This will of course provide you with an opportunity to comment on the actual policies should you wish to do so.

We look forward to receiving your reply - if possible please could you reply by 22

October. Kind regards,

Planning Policy Team Guildford Borough Council

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## Rushmoor Borough Council

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Guildford BC duty to cooperate [UNC]  
**Date:** 20 October 2021 09:26:34

---

Dear Guildford Planning Policy Team,

Thank you for your email in relation to your pending consultation on the Regulation 19 version of the Guildford Local Plan: development management policies.

Having reviewed the document, we can confirm that we agree with your assessment that as the document only comprises the more detailed development management policies, we do not consider that it results in any cross boundary issues upon which we need to cooperate on or agree a statement of common ground in relation to.

We wish you all the best with your consultation and if you have any questions or queries please do not hesitate to contact.

Regards

[REDACTED]  
**Principal Planning Officer**

Planning Policy and Conservation | Rushmoor Borough Council | Council Offices | Farnborough Road | Farnborough | Hampshire | GU14 7JU

[REDACTED] w: [www.rushmoor.gov.uk](http://www.rushmoor.gov.uk)

---

**From:** [REDACTED]  
**Sent:** 05 October 2021 15:33

**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Guildford BC duty to cooperate [UNC]

You don't often get email from [REDACTED] [Learn why this is important](#)

**CAUTION:** This email originated from outside of Rushmoor Borough Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Rushmoor Borough Council,

We are currently in the process of finalising the Regulation 19 version of the Local Plan: development management policies. This forms the second part of our Local Plan and follows on from the adopted Local Plan: strategy and sites (2019). Should you wish to see the scope and content, please see attached the draft version that recently went to the Joint Executive Advisory Board committee. As this document only comprises the more detailed development management policies, we do not consider that it results in any cross boundary issues upon which we need to cooperate on or agree a statement of common ground in relation to. However we would welcome your confirmation regarding this assessment. Please could you confirm that you share this opinion or, if you disagree and consider that it does raise cross boundary issues that require cooperation, please could you indicate which policies and issues these relate to.

We are intending to hold our Regulation 19 consultation following our Council meeting on 1 November. This will of course provide you with an opportunity to comment on the actual policies should you wish to do so.

We look forward to receiving your reply - if possible please could you reply by 22

October. Kind regards,

Planning Policy Team Guildford Borough Council

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carry out your own anti-virus checks before opening any documents. Rushmoor Borough Council will not accept any liability for damage caused by computer viruses emanating from any attachment or other document supplied with this e-mail. E-mails may have to be disclosed or monitored in accordance with relevant legislation.

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DRAFT

## Surrey Heath Borough Council

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Guildford Borough Development Management Policies  
**Date:** 19 October 2021 16:26:23

---

Dear [REDACTED]

Thank you for your email dated 5 October and the subsequent follow up to [REDACTED] on 15 October.

We have reviewed the draft Guildford Borough Local Plan Development Management Policies document provided and are satisfied that due to the non-strategic nature of the policies there are no strategic cross boundary matters raised in that document that would affect Surrey Heath. As a result we do not consider that there is a requirement for a Statement of Common Ground between the two authorities in relation to this proposed development plan document.

Please do not hesitate to contact me if you require anything further on this.

Kind regards

[REDACTED]

[REDACTED]

Planning Policy Consultant  
Planning Services

Finance and Customer Services Directorate  
Surrey Heath Borough Council

[REDACTED]

SURREY HEATH DISCLAIMER



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For contact and service information, please refer to [www.surreyheath.gov.uk](http://www.surreyheath.gov.uk)

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DRAFT

## Waverley Borough Council

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Guildford BC duty to cooperate [UNC]  
**Date:** 22 October 2021 09:44:30

---

Dear Guildford Borough Council,

Thank you for your email dated 5<sup>th</sup> October 2021.

I can confirm that Waverley Borough Council is of the view that the draft Regulation 19 version of the Local Plan: development management policies does not raise issues of a strategic cross-boundary nature and that a statement of common ground between Guildford Borough Council and Waverley Borough Council is not required in relation to this proposed development plan document.

This is an officer response prepared in liaison with the Council's Portfolio Holder for Planning Policy and Services.

Kind regards

[REDACTED]  
Team Leader (Local Plans and Planning Policy)  
Waverley Borough Council

[REDACTED]  
[www.waverley.gov.uk](http://www.waverley.gov.uk)

---

**From:** [REDACTED]  
**Sent:** 05 October 2021 15:25  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Guildford BC duty to cooperate [UNC]

[\*\* This email originates from an external source \*\*]

---

Dear Waverley Borough Council,

We are currently in the process of finalising the Regulation 19 version of the Local Plan: development management policies. This forms the second part of our Local Plan and follows on from the adopted Local Plan: strategy and sites (2019). Should you wish to see the scope and content, please see attached the draft version that recently went to the Joint Executive Advisory Board committee. As this document only comprises the more detailed development management policies, we do not consider that it results in any cross boundary issues upon which we need to cooperate on or agree a statement of common ground in relation to. However we would welcome your confirmation regarding this assessment. Please could you confirm that you share this opinion or, if you disagree and consider that it does raise cross boundary issues that require cooperation, please could you indicate which policies and issues these relate to.

We are intending to hold our Regulation 19 consultation following our Council meeting on 1 November. This will of course provide you with an opportunity to comment on the actual policies should you wish to do so.

We look forward to receiving your reply - if possible please could you reply by 22

October. Kind regards,

**Planning Policy Team**  
**Guildford Borough Council**

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DRAFT

## Woking Borough Council

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Response  
**Date:** 08 November 2021 15:14:51

---

[REDACTED]

I have just cut and paste the original message. I have resent the message 4 times and cannot understand why you are not receiving it.

**From:** [REDACTED]  
**Sent:** 25 October 2021 12:59  
**To:** [REDACTED]  
**Subject:** FW: Guildford BC duty to cooperate [UNC]

Dear [REDACTED]

Thank you for inviting Woking Borough Council to confirm whether a Statement of Common Ground between the two authorities will be necessary for the purposes of preparing your Development Management Policies DPD. The Development Management Policies DPD does not raise any cross boundary issues of strategic significance, and as such, I can confirm that a Statement of Common Ground will not be necessary in this regard. The Council will however appreciate it if you can continue to engage with it during the subsequent stages of the DPD preparation process.

Regards

[REDACTED]

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# Prescribed Bodies

## Environment Agency

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]  
**Date:** 19 October 2021 11:56:27  
**Attachments:** [image001.gif](#)  
[image002.gif](#)  
[image003.gif](#)  
[image004.gif](#)  
[image005.gif](#)  
[image006.png](#)

---

Dear [REDACTED]

Thanks for contacting us.

I can confirm that we are of the view that a statement of common ground is not considered necessary in relation to DM policies.

Kind regards,

[REDACTED]

[REDACTED]

Planning Advisor, Thames Sustainable Places Team  
**Environment Agency**, Red Kite House, Wallingford, OX10 8BD

[REDACTED]

Normal working hours:  
MON/TUE/WED/FRI 10am – 2pm  
THUR 10am – 5pm

*Speak to us early about environmental issues and opportunities* – We can provide a free pre- application advice note or for more detailed advice or meetings we can provide a project manager to co-ordinate specialist advice which costs £100 per hour + VAT. For more information, please email us at [REDACTED]  
[REDACTED]



cid:image006.png@01D2A865.C6C2BCA0



**From:** [REDACTED]

**Sent:** 14 October 2021 11:59

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Dear Environment Agency,

As you are aware, Guildford Borough Council is continuing to prepare the second part of its Local Plan – the Local Plan: development management policies (LPDMP). You have kindly already provided formal comments to the Regulation 18 consultation that was undertaken in June/July 2020. We also recently contacted you (on 2 August) to update you on the approach taken to your comments and to understand whether you had any further comments on the emerging policy approach prior to formal Regulation 19 consultation that we intend to begin in early November. Given your organisation's role as the statutory body, we have sought to positively address all the formal comments you submitted at Regulation 18, as demonstrated in the email sent to you in early August.

We have set out your formal comments, our responses, along with the associated process followed in our Consultation and Duty to Cooperate Statement (C&DtCS) that will be published as part of the Regulation 19 consultation. Having reviewed your comments to date, both formal and informal, and in light of the detailed nature and scope of the proposed Regulation 19 policies, we are of the view that none the policies contained within the plan raise 'strategic matters' that cross administrative boundaries. However in the interests of effective plan-making we still consider it is important that we have, and continue to, actively cooperate with you given the planning remit you hold in some of the policy areas covered within the plan. To date, we consider that there has been effective cooperation between ourselves and that this is clearly evidenced by the C&DtCS, which we will update as plan-making progresses.

We are thus of the view that a formal statement of common ground (SoCG) between ourselves is not warranted and would be disproportionate in terms of further evidence of effective cooperation over and above the C&DtCS.

**Prior to publishing the Pre-Submission Regulation 19 version of the LPDMP, we wish to request that you confirm that you are in agreement that the plan does not raises strategic matters that cross administrative boundaries and that therefore a formal statement of**

**common ground is not necessary to demonstrate effective cooperation. We would appreciate it if you could indicate your view by 22 October.**

There will of course be further opportunity to comment formally via the forthcoming Regulation 19 consultation process.

Kind regards,



**Principal Planning Officer**

**Planning Policy**

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DRAFT

## Highways England

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]  
**Date:** 22 October 2021 12:00:52

---

Dear [REDACTED]

I agree a statement of common ground is not necessary at this time. Although this is not to say that there are not cross boundary issues to be considered in relation to transport going forward.

Kind Regards

[REDACTED] Area 3 Spatial Planning Manager  
National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ  
[REDACTED]  
Web: <http://www.highways.gov.uk>  
GTN: 0300 470 1043

---

**From:** [REDACTED]  
**Sent:** 14 October 2021 12:00

**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Dear [REDACTED]

As you are aware, Guildford Borough Council is continuing to prepare the second part of its Local Plan – the Local Plan: development management policies (LPDMP). You have kindly already provided formal comments to the Regulation 18 consultation that was undertaken in June/July 2020. We also recently contacted you (on 2 August) to update you on the approach taken to your comments and to understand whether you had any further comments on the emerging policy approach prior to formal Regulation 19 consultation that we intend to begin in early November. Given your organisation's role as the statutory body, we have sought to positively address all the formal comments you submitted at Regulation 18, as demonstrated in the email sent to you in early August.

We have set out your formal comments, our responses, along with the associated process followed in our Consultation and Duty to Cooperate Statement (C&DtCS) that will be published as part of the Regulation 19 consultation. Having reviewed your comments to date, both formal and informal, and in light of the detailed nature and scope of the proposed Regulation 19 policies, we are of the view that none the policies contained within the plan raise 'strategic matters' that cross administrative boundaries. However in the interests of effective plan-making we still consider it is important that we have, and continue to, actively cooperate with you given the planning remit you hold in some of the policy areas covered within the plan. To date, we consider that there has been effective cooperation between ourselves and that this is clearly evidenced by the C&DtCS, which we will update as plan-making progresses.

We are thus of the view that a formal statement of common ground (SoCG) between ourselves is not warranted and would be disproportionate in terms of further evidence of effective cooperation over and above the C&DtCS.

Prior to publishing the Pre-Submission Regulation 19 version of the LPDMP, we wish to request that you confirm that you are in agreement that the plan does not raises strategic matters that cross administrative boundaries and that therefore a formal statement of common ground is not necessary to demonstrate effective cooperation. We would appreciate it if you could indicate your view by 22 October.

There will of course be further opportunity to comment formally via the forthcoming Regulation 19 consultation process.

Kind regards,

  
**Principal Planning Officer**  
**Planning Policy**

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***/National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://www.gov.uk/government/organisations/highways-england> | [info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk)***

*Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ*

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## Historic England

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]  
**Date:** 20 October 2021 09:41:35

---

Dear [REDACTED]

Thank you for your email requesting Historic England's view on the need for a Statement of Common Ground with the Council in respect of the Development Management Policies DPD. I concur with your statement that the draft DPD does not raise strategic matters that cross administrative boundaries that would require a formal SoCG under the Duty to Cooperate regulations.

I trust this response provides the confirmation you require.

Best regards,

[REDACTED]

Historic Environment Planning Adviser

Regions Group, London and South East Region

Historic England, 4<sup>th</sup> Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill,  
London EC4R 2YA

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 14 October 2021 12:02

**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

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Dear Historic England,

As you are aware, Guildford Borough Council is continuing to prepare the second part of its Local Plan – the Local Plan: development management policies (LPDMP). You have kindly already provided formal comments to the Regulation 18 consultation that was undertaken in June/July 2020. We also recently contacted you (on 2 August) to update you on the approach taken to your comments and to understand whether you had any further comments on the emerging policy approach prior to formal Regulation 19 consultation that we intend to begin in early November. Given your organisation’s role as the statutory body, we have sought to positively address all the formal comments you submitted at Regulation 18, as demonstrated in the email sent to you in early August.

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We are thus of the view that a formal statement of common ground (SoCG) between ourselves is not warranted and would be disproportionate in terms of further evidence of effective cooperation over and above the C&DtCS.

Prior to publishing the Pre-Submission Regulation 19 version of the LPDMP, we wish to request that you confirm that you are in agreement that the plan does not raise strategic matters that cross administrative boundaries and that therefore a formal statement of common ground is not necessary to demonstrate effective cooperation. We would appreciate it if you could indicate your view by 22 October.

There will of course be further opportunity to comment formally via the forthcoming Regulation 19 consultation process.

Kind regards,



**Principal Planning Officer**  
**Planning Policy**

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## Natural England

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]  
**Date:** 25 October 2021 11:25:46  
**Attachments:** [image001.png](#)

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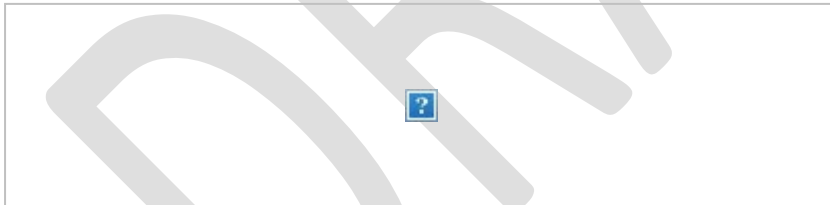
Dear [REDACTED]

I can confirm that the plan does not raise strategic matters that cross administrative boundaries and that a statement of common ground is not necessary to demonstrate our effective co- operation.

Kind regards,

[REDACTED]  
Sustainable Development Lead  
Advisor Thames Solent Team |  
Natural England [REDACTED]

<https://www.gov.uk/natural-england>



---

**From:** [REDACTED]  
**Sent:** 25 October 2021 09:27

**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Dear [REDACTED]

We sent you an email recently (please see below) – I was just wondering whether you



have had the opportunity to consider it yet? We are intending to start consultation on 5 November and it would be helpful to understand your position in relation to not requiring a statement of common ground between us for the purposes of our emerging development management policies DPD. I've attached the emerging plan for reference.

Kind regards, [REDACTED]

---

**From:** [REDACTED]

**Sent:** 14 October 2021 12:04

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Dear Natural England,

As you are aware, Guildford Borough Council is continuing to prepare the second part of its Local Plan – the Local Plan: development management policies (LPDMP). You have kindly already provided formal comments to the Regulation 18 consultation that was undertaken in June/July 2020. We also recently contacted you (on 2 August) to update you on the approach taken to your comments and to understand whether you had any further comments on the emerging policy approach prior to formal Regulation 19 consultation that we intend to begin in early November. Given your organisation's role as the statutory body, we have sought to positively address all the formal comments you submitted at Regulation 18, as demonstrated in the email sent to you in early August.

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common ground is not necessary to demonstrate effective cooperation. We would appreciate it if you could indicate your view by 22 October.

There will of course be further opportunity to comment formally via the forthcoming Regulation 19 consultation process.

Kind regards,

  
**Principal Planning Officer**  
**Planning Policy**

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## Surrey County Council

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]  
**Date:** 17 November 2021 11:16:02  
**Attachments:** [image001.jpg](#)

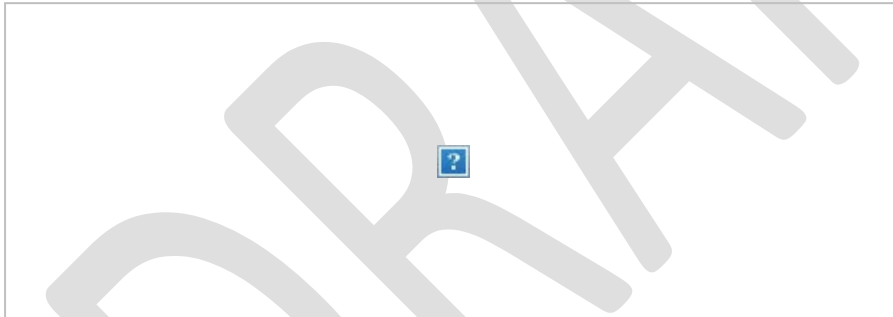
---

Hi [REDACTED],

My colleague has also taken a look at the documents you provided after previous rounds of consultation and agrees that an SoCG is not required.

Kind regards,

[REDACTED]  
Spatial Planning Officer  
Environment, Transport & Infrastructure Directorate



---

**From:** [REDACTED]  
**Sent:** 11 November 2021 07:55  
**To:** [REDACTED]  
**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

**Caution:** This email originated from outside Surrey County Council.

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Hi [REDACTED]

Whilst missing the print deadline for the papers, confirmation of your position by the

actual meeting on the 23 Nov would be really helpful in case this issue gets raised. Do you think that might be possible?

Kind regards, [REDACTED]

---

**From:** [REDACTED]

**Sent:** 10 November 2021 18:01

**To:** [REDACTED]

**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Hi [REDACTED]

I haven't been able to meet with my colleague yet on this, despite your deadline. I'm not sure however if there's anything to follow up.

Kind regards

[REDACTED]

Spatial Planning Officer  
Environment, Transport & Infrastructure Directorate

---

**From:** [REDACTED]

**Sent:** 09 November 2021 17:16

**To:** [REDACTED]

**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

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Thank you [REDACTED] for chasing your

end. Kind regards, [REDACTED]

---

**From:** [REDACTED]

**Sent:** 09 November 2021 17:09

**To:** [REDACTED]

**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Hi [REDACTED]

I'm just trying to get an answer from colleagues but I personally don't think there will be a need for an SoCG based on your responses to our earlier comments. I will email again tomorrow.

Kind regards,

[REDACTED]  
Spatial Planning Officer  
Environment, Transport & Infrastructure Directorate

---

**From:** [REDACTED]  
**Sent:** 08 November 2021 10:56

**To:** [REDACTED]  
**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

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Hi [REDACTED]

The deadline for print is this Thursday – do you think you might be able to get back to us by this Wed?

Kind regards, [REDACTED]

---

**From:** [REDACTED]  
**Sent:** 03 November 2021 17:19

**To:** [REDACTED]  
**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Hi [REDACTED]

Thanks for this. I will talk about the plan with [REDACTED] and come back to

you. Kind regards,

[REDACTED]  
Spatial Planning Officer  
Environment, Transport & Infrastructure Directorate

---

**From:** [REDACTED]

**Sent:** 03 November 2021 15:36

**To:** [REDACTED]

**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

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Hi [REDACTED]

We have had verbal confirmation that we should proceed on basis of progressing with the changes we have offered (that I alluded to below). As I said the only main change is the widened policy to cover all animals. Please find attached the revised policy in tracked changes. As you will see this certainly doesn't raise any cross boundary issues! With this additional information is it possible to confirm what your position is in relation to cooperation?

If you wish to discuss please let me

know. Kind regards, [REDACTED]

---

**From:** [REDACTED]

**Sent:** 02 November 2021 17:02

**To:** [REDACTED]

**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Hi [REDACTED] – we are still slightly in the dark but hope to have a bit more clarity tomorrow. At the moment there is talk (not confirmed!) about going to exec on 23 Nov and full Council early Dec. Given Christmas we are probably only going to start consultation in the new year. We have a set of minor changes that we have offered but we await to see if this goes far enough. They are pretty minor (few additional words here and there) but the one significant change is that the 'equine related development' is amended to 'animal related development' (its significant to some people!). I will email you tomorrow PM likely with hopefully a better idea of the way forward.

Kind regards, [REDACTED]

---

**From:** [REDACTED]

Sent: 02 November 2021 16:56

To: [REDACTED]

Subject: RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Hi [REDACTED]

I read that the Reg 19 plan was pulled from Guildford's Executive last week so I thought it was best to hold fire on this just in case there are any changes to the plan (fingers crossed there aren't) I don't suppose you know yet when we're next likely to have final details of the plan to be circulated for consultation?

Kind regards,

[REDACTED]  
Spatial Planning Officer  
Environment, Transport & Infrastructure Directorate

---

From: [REDACTED]

Sent: 01 November 2021 08:00

To: [REDACTED]

Subject: RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

**Caution:** This email originated from outside Surrey County Council.

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Thanks [REDACTED] – much

appreciated. Kind regards, [REDACTED]

---

From: [REDACTED]

Sent: 29 October 2021 17:24

To: [REDACTED]

Cc: [REDACTED]

[REDACTED] Subject: RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Hi [REDACTED]

I'm so sorry that it's taken me this long to get back to you. I acknowledge you're

intention to begin consultation on the 5<sup>th</sup> November so I will consult with colleagues and get back to you asap next week. Whilst I wouldn't want to pre-empt comments from colleagues, it doesn't seem as if an SoCG would be necessary.

Kind regards,

[REDACTED]  
Spatial Planning Officer  
Environment, Transport & Infrastructure Directorate

---

**From:** [REDACTED]

**Sent:** 25 October 2021 09:27

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED] **Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

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Dear [REDACTED]

We sent you an email recently (please see below) – I was just wondering whether you have had the opportunity to consider it yet? We are intending to start consultation on 5 November and it would be helpful to understand your position in relation to not requiring a statement of common ground between us for the purposes of our emerging development management policies DPD. I've attached the emerging plan for reference.

Kind regards, [REDACTED]

---

**From:** [REDACTED]

**Sent:** 14 October 2021 12:06

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Dear [REDACTED]

As you are aware, Guildford Borough Council is continuing to prepare the second part of



its Local Plan – the Local Plan: development management policies (LPDMP). You have kindly already provided formal comments to the Regulation 18 consultation that was undertaken in June/July 2020. We also recently contacted you (on 2 August) to update you on the approach taken to your comments and to understand whether you had any further comments on the emerging policy approach prior to formal Regulation 19 consultation that we intend to begin in early November. Given your organisation’s role as the statutory body, we have sought to positively address all the formal comments you submitted at Regulation 18, as demonstrated in the email sent to you in early August.

We have set out your formal comments, our responses, along with the associated process followed in our Consultation and Duty to Cooperate Statement (C&DtCS) that will be published as part of the Regulation 19 consultation. Having reviewed your comments to date, both formal and informal, and in light of the detailed nature and scope of the proposed Regulation 19 policies, we are of the view that none the policies contained within the plan raise ‘strategic matters’ that cross administrative boundaries. However in the interests of effective plan-making we still consider it is important that we have, and continue to, actively cooperate with you given the planning remit you hold in some of the policy areas covered within the plan. To date, we consider that there has been effective cooperation between ourselves and that this is clearly evidenced by the C&DtCS, which we will update as plan-making progresses.

We are thus of the view that a formal statement of common ground (SoCG) between ourselves is not warranted and would be disproportionate in terms of further evidence of effective cooperation over and above the C&DtCS.

Prior to publishing the Pre-Submission Regulation 19 version of the LPDMP, we wish to request that you confirm that you are in agreement that the plan does not raise strategic matters that cross administrative boundaries and that therefore a formal statement of common ground is not necessary to demonstrate effective cooperation. We would appreciate it if you could indicate your view by 22 October.

There will of course be further opportunity to comment formally via the forthcoming Regulation 19 consultation process.

Kind regards,

  
**Principal Planning Officer**  
**Planning Policy**

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## Surrey Nature Partnership

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]  
**Date:** 26 October 2021 09:42:43  
**Attachments:** [image001.png](#)

---

Hi [REDACTED]

Thank you for both your original email and its chaser. My apologies for this delayed response. As I am only Chair of the SNP's Biodiversity Group it was important that I first obtained the agreement of the partnership's Director on this matter. I will also admit that this is the first occasion that any party has sought to formalise a planning consultation with the SNP to this extent.

I am sure that your reasoning as regards the statutory basis for requiring a formal SoCG is correct, and I note that our comments are/will be fully recorded in your documentation record for this consultation. LNPs have no formal statutory function in planning regulation; rather they are designed to lead collaboration, be influential and offer advice on specialist and now fast-evolving matters around sustainability policy for the recovery of the natural environment. We hope that we can continue to be of service to yourselves in that mission.

Yours sincerely,  
mike

[REDACTED]

*Living Landscapes, Policy & Research Manager*

**Surrey Wildlife Trust**

School Lane | Pirbright | Surrey | GU24 0JN

[REDACTED]

[REDACTED]

State-of-Nature-Footer (2)



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**From:** [REDACTED]

**Sent:** 25 October 2021 09:26

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Dear [REDACTED]

We sent you an email recently (please see below) – I was just wondering whether you have had the opportunity to consider it yet? We are intending to start consultation on 5 November and it would be helpful to understand your position in relation to not requiring a statement of common ground between us for the purposes of our emerging development management policies DPD. I've attached the emerging plan for reference.

Kind regards, [REDACTED]

---

**From:** Laura Howard

**Sent:** 14 October 2021 12:08

**To:** [REDACTED]  
[REDACTED]

**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Cooperation during preparation of Guildford's Local Plan: development management policies [UNC]

Dear Surrey Nature Partnership,

As you are aware, Guildford Borough Council is continuing to prepare the second part of its Local Plan – the Local Plan: development management policies (LPDMP). You have kindly already provided formal comments to the Regulation 18 consultation that was undertaken in June/July 2020. We also recently contacted you (on 2 August) to update you on the approach taken to your comments and to understand whether you had any further comments on the emerging policy approach prior to formal Regulation 19 consultation that we intend to begin in early November. Given your organisation's role as the statutory body, we have sought to positively address all the formal comments you submitted at Regulation 18, as demonstrated in the email sent to you in early August.

We have set out your formal comments, our responses, along with the associated process followed in our Consultation and Duty to Cooperate Statement (C&DtCS) that will be published as part of the Regulation 19 consultation. Having reviewed your comments to date, both formal and informal, and in light of the detailed nature and scope of the proposed Regulation 19 policies, we are of the view that none the policies contained within the plan raise 'strategic matters' that cross administrative boundaries. However in the interests of effective plan-making we still consider it is important that we

have, and continue to, actively cooperate with you given the planning remit you hold in some of the policy areas covered within the plan. To date, we consider that there has been effective cooperation between ourselves and that this is clearly evidenced by the C&DtCS, which we will update as plan-making progresses.

We are thus of the view that a formal statement of common ground (SoCG) between ourselves is not warranted and would be disproportionate in terms of further evidence of effective cooperation over and above the C&DtCS.

Prior to publishing the Pre-Submission Regulation 19 version of the LPDMP, we wish to request that you confirm that you are in agreement that the plan does not raise strategic matters that cross administrative boundaries and that therefore a formal statement of common ground is not necessary to demonstrate effective cooperation. We would appreciate it if you could indicate your view by 22 October.

There will of course be further opportunity to comment formally via the forthcoming Regulation 19 consultation process.

Kind regards,

  
**Principal Planning Officer**  
**Planning Policy**

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### **Are you a member of Surrey Wildlife Trust?**

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## Appendix 3 – Guildford borough Local Plan: Development Management Policies (2022) Questionnaire and Representation Form



**Guildford Borough Council**

**Proposed Submission Local Plan: Development Management Policies (2022)**

**Consultation questionnaire and representation form**

Guildford Borough Council is inviting representations on the Proposed Submission Local Plan: Development Management Policies (2022). This questionnaire asks questions about the document as a whole and the documents that have informed and supported the plan. If you would like to make comments about a particular section of the document, please use the representation forms at **Appendix 1** of this questionnaire.

The questionnaire and representation form both ask questions about **legal compliance, soundness, and compliance with the duty to cooperate**. For more information about the meaning of legal compliance, soundness, and the duty to cooperate, please read the guidance notes at **Appendix 2** of this questionnaire.

Please note that verbal comments cannot be taken into consideration. We cannot accept anonymous comments and ask that you provide your name and postal and/or email address as a minimum. Your comments and your name will be published when the consultation is complete, but personal information such as email and postal addresses will be kept confidential. Completed paper forms can be returned by the closing date of 12 noon on 18 February 2022 by post to: Planning Policy, Guildford Borough Council, Millmead House, Millmead, Guildford, GU2 4BB. Alternatively, you can complete the questionnaire online at <https://guildford.inconsult.uk/LPDMP21> or email your comments to [localplan@guildford.gov.uk](mailto:localplan@guildford.gov.uk).

If you would like to be notified about the progress of the Local Plan: Development Management Policies and other planning policy consultations, please register on our consultation database at <https://guildford.inconsult.uk> or email us at [planningpolicy@guildford.gov.uk](mailto:planningpolicy@guildford.gov.uk).

We will collate and analyse all the comments received, and update the Consultation Statement which provides our response to all the main issues raised to both last year's Regulation 18 consultation and this Regulation 19 consultation. This will be published alongside the submission version of the Local Plan that will be passed on to the Secretary of State for examination by an independent Planning Inspector. Your comments will be made available to the Inspector who examines the plan.

	Your details	Agent's details (if applicable)
Title	Mr Mrs Miss Ms Other _____	Mr Mrs Miss Ms Other _____
First Name		
Last Name		
Job title and/or organisation (if relevant)		
Address		
Telephone		
Email		

**Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: Development Management Policies (2022) is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan is listed in the Plan in the green boxes headed key evidence under each policy.

**Do you agree that the evidence used for the Proposed Submission Local Plan: Development Management Policies (2022) is adequate, up-to-date, and relevant?** Yes  No

If you make a comment about a specific evidence base document, please tell us which document you are commenting on.

**Comment:**

**Question 2: Legal Compliance**

**Do you consider the Proposed Submission Local Plan: Development Management Policies (2022) as a whole is legally compliant?** Yes  No

Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**Comment:**



**Question 3: Soundness**

*Do you consider the Proposed Submission Local Plan: Development Management Policies (2022) as a whole is sound?*

Yes  No

Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**Comment:**

**Question 4: Duty to cooperate**

*Do you consider the Proposed Submission Local Plan: Development Management Policies (2022) as a whole has complied with the duty to cooperate?*

Yes  No

Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

**Comment:**

**Question 5: The content of the plan**

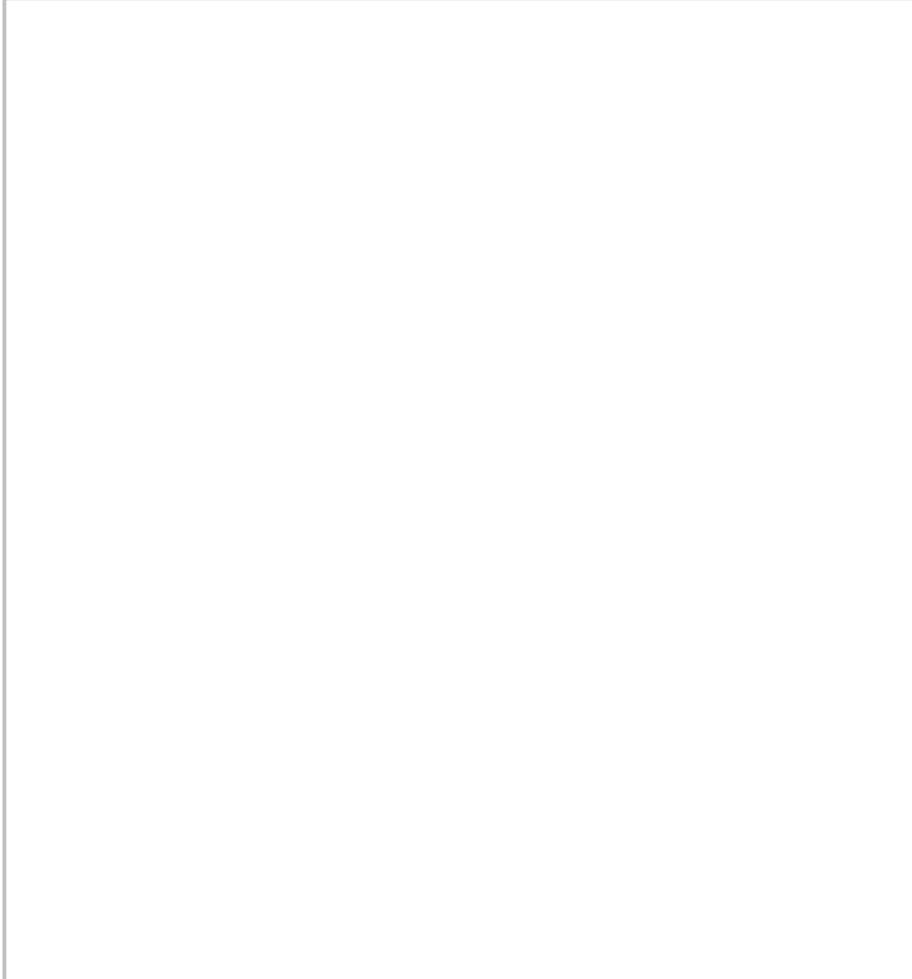
Please have your say about the individual sections of the plan. See the attached representation forms at **Appendix 1** of this questionnaire.

**Question 6: Any other comments?**

*Do you have any other comments that have not been covered by the previous questions?* Yes  No

Please note, comments can only be considered where they relate the plan or documents that have been produced in support of the plan.

**Comment:**



**Appendix 1: Question 5 - Representation form**

Please use this form to make comments about particular sections of the Proposed Submission Local Plan: Development Management Policies. Please use one form for each paragraph, section, policy and/or appendix you are commenting on, using as many copies of the form (or additional blank sheets) as you need.

We cannot accept anonymous comments so please make sure you fill in the front page of the questionnaire and return it with this form, or you can write your name and contact details (an email and/or postal address) clearly at the top of this page.

*To which changed section of the plan (paragraph/policy/appendix/table) does this comment relate?*

Para.  Policy  Appendix  Table

*Do you consider this section of the plan is legally compliant?*

Yes  No

*Do you consider this section of the plan is sound?*

Yes  No

*Do you consider this section of the document complies with the Duty to cooperate?*

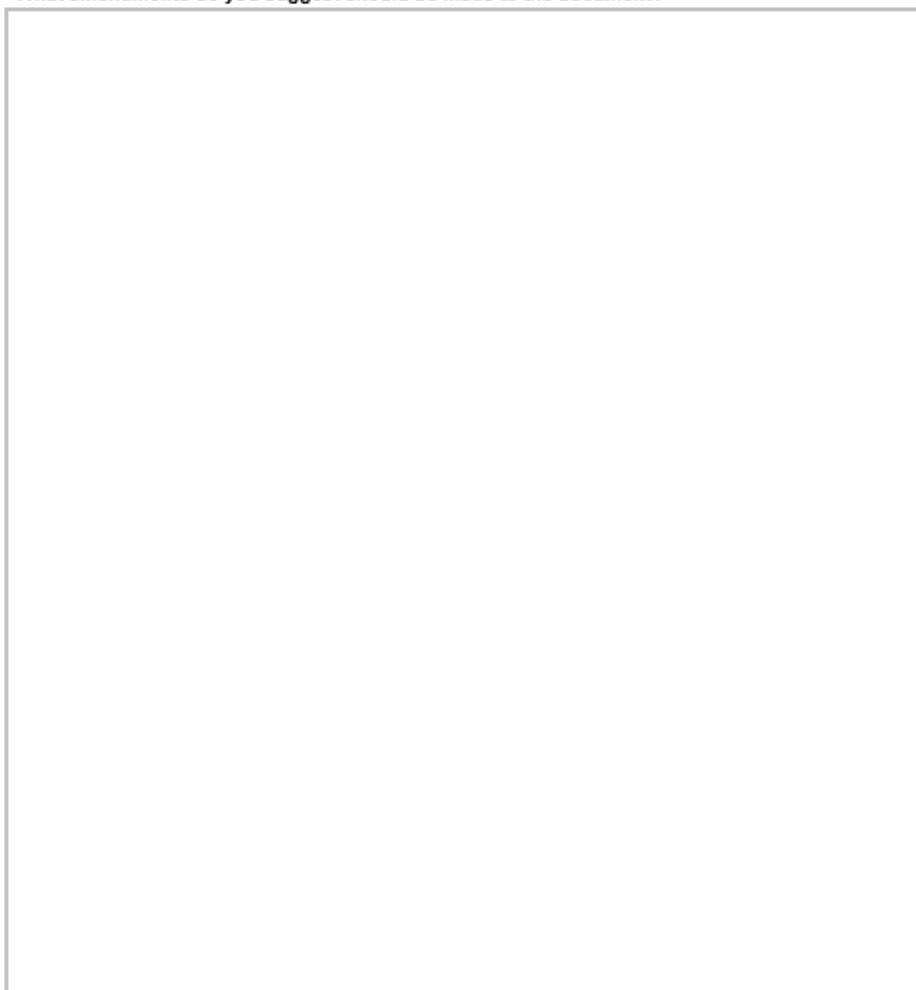
Yes  No

If you answered "No" to any of the questions above, please give details in the box below of why you consider this section of the document not to be legally compliant and/or unsound and/or does not comply with the Duty to cooperate. Please be as precise as possible. You are also encouraged to make general comments about this section of the document. Your comments need not be restricted to the matters of legal compliance, soundness, and Duty to cooperate.

**Comment:**

What amendment(s) do you think should be made to the document? It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. If you are proposing an amendment to make the proposed change legally compliant, sound, or comply with the Duty to cooperate, you will need to say why this further amendment will make the document legally compliant, sound or comply with the Duty to cooperate.

**What amendments do you suggest should be made to the document?**



**Thank you for completing this form.**

If you would like to participate in the Examination in Public, expressions of interest must be made via the programme officer at the relevant time. More details will become available on our website ([www.guildford.gov.uk/localplan](http://www.guildford.gov.uk/localplan)) closer to the examination.

## **Appendix 2: Legal compliance, soundness and duty to cooperate guidance notes.**

Local Plans set planning policies in local authority areas and form the starting point when deciding planning applications. Independent planning inspectors must examine the 'soundness' of plans through an Examination, which can include public meetings called 'hearings'.

The process of producing a Local Plan should fully involve everyone who has an interest in the document and at the end of the process they should have had the chance to comment and, where appropriate, appear at any relevant hearing sessions of the Examination to present their case.

In summary, the Inspectors will be considering three questions:-

### **1. Is the plan legally compliant?**

During an Examination the Inspector will first check that the Plan meets the legal requirements of the relevant Planning Acts and Regulations. A plan is considered legal when it complies with the legal requirements under section 20(5) (a) of the Planning and Compulsory Purchase Act 2004 (as amended).

Relevant to this issue (but not exhaustively) is whether the Plan in question:

- Has had regard to national policy and guidance issued by the Secretary of State
- has been prepared in-line with our Local Development Scheme (LDS). The LDS is effectively a programme of work prepared by the Council, setting out the documents to be produced. It sets out the key stages in the production of any documents the Council propose to bring forward for independent examination. The LDS can be found online at [www.guildford.gov.uk/lDs](http://www.guildford.gov.uk/lDs).
- complies with the Town and County Planning (Local Planning) (England) Regulations 2012. On submission of the Local Plan, the Council must publish the documents prescribed in the regulations and make them available at their principal offices and on their website.
- Whether the appropriate notifications have been made.
- Whether a Sustainability Appraisal assessing social, environmental, and economic factors has been done and made public. The Sustainability Appraisal is a tool for appraising the plan to ensure it reflects social, environmental, and economic factors.
- Whether the plan meets the requirements of the Habitats Directive and the Conservation of Habitats and Species Regulations 2010 (as amended).

### **2. Is the plan sound?**

To meet the Test of Soundness, the independent Planning Inspector is required to consider if our Local Plan has been **positively prepared**, is **justified** and **effective** and is **consistent with national policy**.

The following points are relevant when considering legal compliance, as set out in paragraph 35 of the National Planning Policy Framework. To be sound, a plan should be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

### **3. Has the plan complied with the duty to cooperate?**

A legal duty has been placed on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

Section 20(5) (c) of the Planning and Compulsory Purchase Act 2004 (as amended) and paragraphs 24-27 of the National Planning Policy Framework create a duty on all local planning authorities and other bodies to cooperate with each other to address strategic issues in the preparation of the Local Plan. The National Planning Practice Guidance sets out further information on the duty to cooperate.

The National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (PPG) can be found at:

- NPPF: <https://www.gov.uk/government/publications/national-planning-policy-framework-2>
- PPG: <https://www.gov.uk/government/collections/planning-practice-guidance>

## Appendix 4 – Guildford borough Local Plan: Development Management Policies (2022) Online Consultation System – INOVEM

### Proposed Submission Local Plan: Development Management Policies

The Council adopted the **Local Plan: strategy and sites 2015-2034** in 2019. We are now producing the second part of the Local Plan, the **Local Plan: Development Management Policies**. This document will provide further and more detailed planning policies to use when planning applications are determined.

The Proposed Submission Local Plan: Development Management Policies consultation follows on from the draft 'Local Plan: development management policies – Issues and Preferred Options' consultation in 2020, which set out the issues that the development management policies should address

and the preferred options for addressing them. The comments submitted during that consultation are available at the link above and have been used to help develop the proposed submission version of the Local Plan: Development Management Policies.

The Proposed Submission Local Plan: Development Management Policies document can be found below under 'Consultation Documents' in PDF format.

For supporting documents (including the Local Plan Part 2 Sustainability Appraisal and Consultation Statement) please visit the Local Plan Part 2 web page at

- <https://www.guildford.gov.uk/article/25707/Part-2-of-our-Local-Plan>.

#### Consultation

The consultation will run from **12:00 midday on 7 January** to **12:00 midday on 18 February 2022**.

There are two **Online questionnaires** below:

- The **'Online questionnaire: general comments about the plan or process'** asks questions about the plan as a whole and the plan making process regarding matters such as legal compliance, soundness and the duty to cooperate.
- The **'Online questionnaire: specific policies, sections and paragraphs'** asks for comments about specific policies, paragraphs or sections of the plan.

You can email or post your comments using the contact details at the bottom of this page but please remember to tell us your full name and ensure you state clearly which part of the plan or which issue each of your comments relates to. We cannot accept verbal comments.

Your comments and your name will be published when the consultation is complete, but personal information such as email and postal addresses will be kept confidential.

We will collate and analyse all the comments received, and update the Consultation Statement which provides our response to all the main issues raised to both last year's Regulation 18 consultation and this Regulation 19 consultation. The Consultation Statement will be published alongside the version of the Local Plan: Development



Management Policies that will be submitted to the Secretary of State for examination by an independent Planning Inspector. Your comments will be made available to the Inspector who examines the plan.

There will be no face to face events during this consultation because of COVID restrictions. If you have any questions regarding the plan, we are offering 15 minute online meeting slots with the relevant planning officers through Microsoft Teams. The meetings are to clarify any issues before you submit your written comments and not to discuss the merits of the policies. If you wish to book a 15 minute slot, please email [planningpolicy@guildford.gov.uk](mailto:planningpolicy@guildford.gov.uk) telling us the policy areas you would like to discuss and we will be in touch to arrange a suitable date and time. Please note we are unable to support Zoom or other online meeting platforms.

Please note, due to essential maintenance this consultation portal will be unavailable on **Wednesday 19th January 2022 from 8:00pm for around 2 hours**. If you are using the online questionnaires, please save your response before this point.

**This consultation has closed.**

## Timeline



Opened  
7 Jan 2022 at 12:00

**Closed**  
**18 Feb 2022 at 12:00**

## Consultation Documents

[Online questionnaire: general comments about the plan or process](#)

Use this online questionnaire to give your views about the plan as a whole, the plan-making process, the evidence base or any other general matters.

[Online questionnaire: specific policies, sections and paragraphs](#)

Use this questionnaire to give your views on specific policies, sections or chapters in the proposed Local Plan: Development Management Policies

[Local Plan: Development Management Policies](#)

The Proposed Submission Local Plan: Development Management Policies (the Local Plan Part 2)

## Supporting Documents

[Statement of Representations Procedure and Statement of Fact](#)

## Links

- [Sign up for notifications about this consultation](#)

## Details

**Contact Information** Email: [Localplan@guildford.gov.uk](mailto:Localplan@guildford.gov.uk)  
Tel: 01483 444 471  
Planning Policy  
Guildford Borough Council  
Millmead House  
Guildford  
GU2 4BB



## Appendix 5 – Guildford Borough Council press release dated 6 January 2022

06 January 2022

### Local Plan Part 2 – consultation starts 7 January

Help shape the borough's future by commenting on our proposed Local Plan: Development Management Policies in our consultation from 7 January to 18 February.

This Proposed Submission Local Plan: Development Management Policies follows on from the Local Plan: strategy and sites 2015-2034 that was adopted in April 2019 and sets out the detailed development management policies for the whole borough.

Development Management Policies are a series of documents which give guidance to developers so that they will build in a way which we have asked them to. The policies do not replace the adopted Local Plan: strategy and sites 2015-2034 or include areas that are already covered by national policies. We are asking residents to comment as part of the formal process.

When adopted the new plan will play an important role in protecting and enhancing our natural and built environments, developing our local economy, improving leisure and visitor facilities, and supporting more sustainable forms of travel.

Leader of the Council, Cllr Joss Bigmore said: "While the policies have been created with the comments from last year's consultation this is another chance for everyone to have their say on how we manage development across our borough.

"The draft Local Plan, and all the policies that it contains is so important. Our proposed policies cover topics such as heritage, biodiversity, design, infrastructure and transport. They include strong requirements for carbon emissions for new builds. They follow sustainable practice by prioritising total energy efficiency. They also require improved design and construction, better insulation, and efficient heating and lighting.

"There are lots of ways to view the documents and submit your comments. We look forward to hearing from you."

This is our second consultation on the second part of the local plan. Last summer we asked people to give their views on the preferred options for policies in the Plan, which helped us write the policies. This consultation is part of the legal process that all local plans must follow. It gives the public and other interested parties the opportunity to comment on the proposed Local Plan. Comments made at this stage will be analysed by

the Planning Policy team and will be submitted to the Planning Inspector for consideration as part of the Local Plan examination.

The six-week consultation runs from midday on 7 January 2022 to midday on 18 February 2022.

### **Ways to view the documents**

[The Proposed Submission Local Plan: Development Management Policies, supporting documents and key evidence](#) will be available to view:

- on our website
- at Guildford Borough Council offices, Millmead House, Millmead, Guildford, Surrey GU2 4BB during office hours (excluding Bank Holidays).
- during normal opening hours (excluding Bank Holidays) at Guildford Library, Ash Library, Horsley Library and Shere Diamond Jubilee Library.

### **Ways to submit written comments**

Consultation feedback must be provided in writing. Please ensure all comments clearly state and identify which paragraph number or policy they relate to in the Local Plan document.

You can do this in a number of ways:

- complete the [online questionnaire](#).
- email to [localplan@guildford.gov.uk](mailto:localplan@guildford.gov.uk)
- post to: Planning Policy Team, Guildford Borough Council, Millmead House, Millmead, Guildford, GU2 4BB
- completing a paper questionnaire or writing to: Planning Policy, Guildford Borough Council, Millmead House, Millmead, Guildford, Surrey GU2 4BB.
- Paper copies of the questionnaire are available from the Council's Millmead office reception and local libraries. Please note that verbal or anonymous comments cannot be taken into consideration.

Once adopted the draft Local Plan part 2 will, together with the adopted Local Plan: Strategy and Sites (LPSS), fully replace the policies that still remain from the existing Local Plan 2003.

**Appendix 6 – Main Issues (Regulation 19 consultation)**

DRAFT

## Question 1 – The evidence base and submission documents

***Do you agree that the evidence used for the Proposed Submission Local Plan: Development Management Policies (2021) is adequate, up-to-date and relevant?***

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Terrance O'Rourke on behalf of Blackwell Farm Ltd &amp; University of surrey</b>	Left blank
Left blank	The viability assessment uses benchmark land values and construction costs that are very low. This is a concern as it leads to potentially inflated residual land values and therefore affects the validity of the overall viability assessment. This could lead to policy requirements not being capable of being met in full.	The assessment uses a well-established and tested approach to considering and setting assumptions, informed by reference to appropriate sources and experience. The benchmark land values are necessarily considered from an existing use value basis, and no economies of scale are assumed in using BCIS sourced construction costs along with other allowances.
Left blank	<b>Home Builders Federation</b>	Left blank
Left blank	We have concerns regarding the approach taken to considering First Homes in the viability study. Whilst we note that the profit margin has been set at a higher level than for affordable housing, they are still below that for open	Policy H8 has been subject to viability assessment including scenario testing of the profit margin considered suitable for various types of affordable housing. This includes an assumption at twice the profit level used for the rented and

	<p>market housing. Whilst we recognise that such homes are considered an affordable housing tenure they are marketed and sold by the developer and as such should be treated as such with regard to their risk profile and the level of profit that it is reasonable to expect. It is not justified for a lower profit margin to be used on these homes and as such the viability assessment should be updated and the full cumulative impact of this policy to be tested.</p>	<p>shared ownership affordable housing. However, as yet there is no local completed delivery experience of the recent national First Homes policy, and the Council acknowledges that this will take time to settle down. The policy is being introduced by the Council at its least impacting level on viability. The view is that homes offered at well below market values are unlikely to attract very high-risk levels.</p>
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	<p>Environmental issues, such as global warming, the protection of wildlife habitats and ecology, flood and run-off management should also be integral to the Local Plan and at least in line with GBC environmental objectives.</p>	<p>The LPDMP contains policies in relation to increasing/protecting biodiversity and adapting/mitigating to climate change. The Sustainability Appraisal ensures that all policies have been appraised against a range of sustainability objectives. A Habitat Regulations Assessment has also been prepared which assesses whether the plan has the potential to impact upon European protected sites.</p>
Left blank	<p>Consider that the transport evidence base that underpins the LPSS is flawed. Can a development management policy be introduced that allows, and encourages, local councillors to override the advice of Surrey County Council and require further assessment to be carried out on the basis of local knowledge, including junctions that SCC have ignored, and to allow for traffic from all local plan sites to be included.</p>	<p>This is beyond the scope of the LPDMP and relates to decision making.</p>

## Question 2 – Legal Compliance

*Do you consider the Proposed Submission Local Plan: Development Management Policies (2021) as a whole is legally compliant?*

None

DRAFT

### Question 3 – Soundness

*Do you consider the Proposed Submission Local Plan: Development Management Policies (2021) as a whole is sound?*

**Prescribed bodies**

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	<p>We have reviewed the Draft Guildford Borough Local Plan: Development Management Policies Proposed Submission Local Plan, January 2022 alongside the Guildford borough Local Plan: development management policies Issues, Options and Preferred Options - Consultation and Duty to Cooperate Statement, January 2022 and our advice on and suggestions to policies H5, H6, P6, P7, P8, P9, P10, P12, P13, D11, D12, D13, D14, ID6, ID7 and ID10 as in our letter of 20 July 2020 have been applied. We acknowledge and accept the justifications made where the changes we suggested could not be applied.</p> <p><u>Policies we support</u></p> <p>We particularly agree with the changes made to and justifications provided to support Policies P12 and D11 and we support these policies.</p>	Noted

	<p><u>Soundness</u></p> <p>In respect to issues within our remit we consider the Proposed Submission Local Plan: Development Management Policies (2022) to be sound.</p>	
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## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Home Builders Federation</b>	Left blank
Left blank	<p>At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons:</p> <ul style="list-style-type: none"> <li>• The viability assessment has failed to take adequate account of policies relating to biodiversity net gain, first homes and electric vehicle charging points;</li> <li>• The 20% biodiversity net gain requirement is unjustified</li> <li>• The requirement to apply parking standards set out in SPD is inconsistent with national policy;</li> <li>• Requirements relating to carbon emissions repeats building regulations</li> </ul>	<p>Responses to these points can be found against the HBF's detailed comments made elsewhere under the relevant policies.</p>
Left blank	<b>Heine Planning</b>	Left blank
Left blank	The LPDMP should include a criteria based policy setting out the design requirements for traveller proposals on	PPTS paragraph 11 states that criteria should be set to guide land supply allocations where there is an identified need. This



	<p>windfall sites as well as LPSS allocated sites. para 11 PPTS which makes clear that criteria should be set to guide land supply allocations and for windfall applications. These criteria based policies should be fair and designed to facilitate the traditional and nomadic life of travellers.</p>	<p>was undertaken as part of the site allocations work for LPSS 2019. Regarding design requirements, the LPSS includes a number of site allocation policies which reflect specific requirements regarding the allocated plots and pitches. These requirements include specific design related requirements (see for instance Policy A25(17)-(20); Policy A41(15)-(16), and relevant aspects of Policies A46 – A54) along with other requirements relating to delivery of the pitches and plots.</p> <p>Further, the LPSS Policy H1:Homes for all gives strategic guidance on residential accommodation and more detailed guidance in the reasoned justification. As stated in paragraph 4.2.18 of the reasoned justification for LPSS Policy H1: Homes for all:</p> <p>'National planning policy for Gypsy, Traveller and Travelling Showpeople is set out in the National Planning Policy Framework and Planning Policy for Traveller Sites and we will expect all new sites to meet the requirements of national policy. New pitches and plots should have adequate utility services and amenity space, safe turning space and parking and be in areas with reasonable access to schools, health services and local services. Travelling showpeople sites may also need space for related business storage.' General guidance for all new development is given in LPSS Policy D1:Place shaping and other design related policies.</p>
Left blank	<p>There is a need for criteria policies against which applications for ethnic Gypsy Traveller sites for those who do not comply with the planning definition in PPTS are delivered through housing policies as there is no</p>	<p>Whilst the Council does not need to have a 5-year supply of sites for travellers who do not meet the PPTS definition of a traveller, it has made provision within the LPSS to seek to meet their needs. LPSS Policy S2: Planning for the borough - our spatial development strategy (3) states that 'provision has</p>

	<p>requirement in para 10 (a) PPTS for Councils to have a 5 year supply of specific sites for this need.</p>	<p>been made for 4 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople (as defined by Planning Policy for Traveller Sites) within Guildford borough between 2017 and 2034. Whilst the needs of Gypsies, Travellers and Travelling Showpeople who do not meet the planning definition fall outside this allocation, in order to meet their assessed needs the Council will seek to make provision for 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople who do not meet the definition. The Council will also seek to make provision for 8 permanent pitches to meet potential additional need of households of unknown planning status.’ As stated earlier, paragraph 4.2.18 of the reasoned justification for LPSS Policy H1: Homes for all is relevant, as are other design related policies.</p>
Left blank	<p>Adopted policy relies heavily on sites being delivered by third parties as part of large scale mixed developments. Yet there are no safeguards in place to say how this will be done. There does not appear to be any policy to ensure sites to be included as part of housing allocations/ strategic sites are delivered as there is for affordable housing. In the absence of such mechanisms and performance measures to inform planning permissions it will be easy for housing developers to find ways of off setting this requirement and/ or failing to deliver sites. Excuses will be found as to why no suitable land can be found or why land thought suitable is no longer available. Policy needs to make clear how sites will be delivered/ managed/ made affordable. It is important that policies make clear how / when such provision will be delivered/ secured to ensure provision is made at specific phases of large developments and not left to the final stage and conveniently overlooked. This is v important as this approach is heavily relied on to deliver Gypsy Traveller sites</p>	<p>Each site allocation specifically states the number of pitches allocated within each site and the details. For the strategic site allocations, specific requirements are included in the site allocation policies regarding the phasing of delivery of pitches to ensure that they come forward at particular triggers. For example, Policy A25 (21) states that ‘delivery will be phased alongside the delivery of new homes (C3), with two Traveller pitches completed per 500 homes (C3) completed.’ Any planning application which did not comply with the site allocation would be resisted. The detail of the delivery will be set out at the time a planning application is considered e.g specified in supporting documents, section 106 agreements attached to planning approvals and planning conditions. Often the delivery of pitches and plots will be specified in a particular phase of a development and will be set out in a Section 106 agreement.</p>

	<p>with no safeguards in place and experience elsewhere in England would strongly suggest that few new GT sites are being delivered this way. It is an untried/ untested approach potentially fraught with problems if Councils do not have proper mechanism/ policies in place to ensure sites are delivered.</p>	<p>Further, there are safeguards in the LPSS to ensure that allocated pitches and plots are not lost but delivered as planned. In this regard, LPSS Policy H1: Homes for all (2) states that development that results in the net loss of existing housing (C2 use class or C3 use class accommodation or traveller accommodation) will not be permitted. Significant reductions from the approximate housing numbers or reductions from the specific traveller accommodation provision and housing uses as set out in the site allocations will be resisted.</p>
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## Question 4 – Duty to cooperate

*Do you consider the Proposed Submission Local Plan: Development Management Policies (2021) as a whole has complied with the duty to cooperate?*

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Transport for London</b>	Left blank
Left blank	No comments.	Noted.
Left blank	<b>Runnymede Borough Council</b>	Left blank
Left blank	No comments.	Noted.
Left blank	<b>Historic England</b>	Left blank
Left blank	Consider Regulation 18 comments have largely been addressed and are either reflected in the current Submission version or are, in our view, not now likely to affect the soundness of the Local Plan. 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. The key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment, in our view, have been met	Noted.

Left blank	<b>East Hampshire District Council</b>	Left blank
Left blank	No comments.	Noted.
Left blank	<b>Waverley Borough Council</b>	Left blank
Left blank	<p>Our response to the Issues and Preferred Options Consultation set out that we would need further information about the site allocations for renewable and low carbon energy development before we could comment on the approach and consider any cross-boundary impacts. We note that this approach has been changed and that the Proposed Submission Local Plan does not seek to allocate any sites for renewable and low carbon energy. The approach in the Local Plan is therefore now unlikely to have any cross-boundary issues and we consider that should an application come forward on a site for renewable and low carbon energy development, any potential cross-boundary impacts could be dealt with through the development management process.</p> <p>We do not anticipate that any of the other development management policies would have any cross-boundary impacts.</p>	Noted.

## Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	Residents' views have not been taken into account	The legal duty to cooperate applies to a specified set of prescribed bodies. The consultation statement sets out the Council's response to comments made by all respondents, including residents.

## Question 5 – The content of the plan

### Policy H5: Housing Extensions and Alterations including Annexes

#### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency (Thames Area)</b>	Left blank
Policy H5	We have reviewed the Draft Guildford Borough Local Plan: Development Management Policies Proposed Submission Local Plan, January 2022 alongside the Guildford borough Local Plan: development management policies Issues, Options and Preferred Options - Consultation and Duty to Cooperate Statement, January 2022 and our advice on and suggestions to policies H5, H6, P6, P7, P8, P9, P10, P12, P13, D11, D12, D13, D14, ID6, ID7 and ID10 as in our letter of 20 July 2020 have been applied. We acknowledge and accept the justifications made where the changes we suggested could not be applied.	Comments welcomed.

## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Thames Water</b>	Left blank
Policy H5	<p>For 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) By virtue of their low-lying nature 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.</p> <p>We also support supporting paragraph 2.13 in relation to sewer flooding and the installation of a suitable (positively) pumped device which is in line with our previous representations.</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. 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. Wording in the reasoned justification of the policy relates to having pumped devices for basement developments that include a waste outlet.</p>



Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	We support this policy. In relation to annexes we recommend firm indication in the policy or the supporting text that conditions will be added to any permission granted to ensure that the annex cannot be used as a separate dwelling.	Planning permission would be required to use an annex as a separate dwelling.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	<p>1. Compton PC agrees with the preferred option. We would like to see the policy strengthened to ensure that housing 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>2. The terms 'acceptable or unacceptable' in planning terms are vague.</p>	<p>1. Proposed LPDMP 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. LPSS Policy D1: 'Place shaping' requires all new development to respond to the distinctive local character including landscape character.</p> <p>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>2. The terms 'acceptable or unacceptable' are commonly used when considering planning matters.</p>
Left blank	<b>Guildford Greenbelt Group</b>	Left blank
Left blank	1. For homes in the Greenbelt take the starting date as 1968. Put in guidance on what would be regarded as a sensible increase for homes in the Greenbelt.	1. 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 LPSS Policy P2: Green Belt at para 2(a)(i), the Local Plan 2003 (para 5.39) and is also the date specified in the NPPF glossary for 'original building': 'A

	<p>2. For those out of the Greenbelt, we should not lose the argument of the date of the original dwelling as we need to control the escalation of applications that propose unreasonable sized extensions.</p> <p>3. Some measures to prevent the crafty submission of applications that are virtually remodelling the whole house and then when they get permission, suddenly realise it would be cheaper to do a knockdown and re-build - on a bigger footprint, would be helpful, for both Officers and Councillors.</p>	<p>building as existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally’.</p> <p>2. The original size of a building is an issue that relates to Green Belt matters and is outside the scope of this policy. The policy states that extensions must take into account the form, scale, height, character, materials and proportions of the existing building.</p> <p>3. Each planning application needs to be determined on its own merits. The Council cannot control which applications are submitted.</p>
Left blank	<b>Guildford Residents Association</b>	Left blank
Left blank	<p>After H5 1c) add: 1d) provide sufficient space between any neighbouring properties and set back from the frontage to enable green planting within the curtilage of the property and along the frontage consistent with the green character of Guildford.</p>	<p>We consider these matters already addressed by other Local Plan policies. LPDMP Policy D5(4) requires development proposals to have regard to relevant national and local design guidance or codes, including in relation to residential building separation distances.</p> <p>LPDMP Policy D4 3) states that development proposals should respond positively to the...surrounding context...prevailing character, landscape and part 4) d) states that development proposals are expected to demonstrate high quality design...including in relation to...hard landscape and soft landscape.</p>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	<p>1. This policy document should not be a vehicle to promote a particular type of development and we ask for this section</p>	<p>1. The Council cannot control which type of planning applications are submitted. Its role is to determine the</p>

to be removed. While extensions, particularly loft conversions, often have a legitimate justification, in many cases they also have many disadvantages that have not been mentioned; these include diversion of resources away from provision of the new homes that we need, inefficient use of materials and energy (lack of sustainability), loss of the stock of smaller homes that we desperately need, loss of local character, loss of garden space, ugly appearance spoiling the street scene and local character, and compromising use of pavements. They always have a serious impact on neighbours, for which there is no compensation; these include loss of light and privacy, reduction in house value, and major and long-lasting disturbance and nuisance during extension works.

We ask that this policy be clarified as follows:

2. Extensions must not increase the size (volume) of the house from that of the original building by more than 40% or beyond 200sqm. Where extensions have previously been made to the house this criterion must be applied to the cumulative size increase from the original.

3. Driveways and pavement crossovers must not be multiplied.

4. Permitted development rights for extensions to be removed from sensitive areas.

applications put forward. The policies within the Local Plan are there to address concerns over the impact of a development proposal and refuse an application if it would have an unacceptable impact. For example, LPDMP Policy D5 seeks to protect amenity and development proposals are required to avoid having an unacceptable impact on the living environment of privacy and overlooking, visual dominance and overbearing effects of a development, access to sunlight and daylight, artificial lighting, noise and vibration, odour, fumes and dust

2. Each application must be determined on its own merits, and each proposed extension or alteration determined on its merits at that time. Part 1 c) states that development proposals must take into account the form, scale, height, character, materials and proportions of the existing building.

3. Comments about pavement crossovers outside the scope of this policy. Pavement crossovers would be addressed by the local highways authority. In LPDMP Policy H5 3 (d) it states that development proposals for annexes are required to demonstrate that they share a vehicular access.

4. 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>5. Prohibition of house extensions for 5 years after the purchase, including for new houses. Extensions must match the character / design / materials of the original. Over recent years there has been a trend to having extensions in a contrasting / “contemporary” style; some houses have been doubled in size. Both have spoilt the character of the area in appearance and in its community spirit.</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. Part 1 c) of LPDMP Policy H5 states that development proposals are required to take into account the form, scale, height, character, materials and proportions of the existing building.</p>
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	<p>The Key Evidence Base relies on the SHMA from 2017, which is out of date and needs to be updated for the revised ONS data and the 2021 Census data when published.</p>	<p>Evidence base documents will be reviewed as and when required. The key purpose of the SHMA is to establish the overall housing need, identify the housing need of specific groups and establish the housing market area to inform the strategic policies in the adopted Local Plan Strategy and Sites document.</p> <p><a href="https://www.gov.uk/guidance/plan-making#evidence-base">https://www.gov.uk/guidance/plan-making#evidence-base</a></p> <p>However, the SHMA also provides useful indicators for the purposes of this policy as it anticipates within the HMA a 51% growth in people over the age of 65 some who may wish to downsize (or move in with relatives) (SHMA pg 173 para 10.31) and 9% of households contain non-dependant children so may also need additional space within the home (SHMA pg 154 para 9.74). These forecasts apply over the plan period so do not need updating.</p>
Left blank	<b>West Horsley Parish Council</b>	Left blank

Left blank

1. West Horsley Parish Council accept that this policy is well supported by the Residential Alterations & Extensions SPD, 2018. However, we remain concerned that this is not always adhered to by those considering applications, particularly in relation to separation and boundary distances between houses, and the positioning of dormer windows/roof extensions to the rear of properties. It is accepted that the SPD is guidance, not policy, but without further policy protection for the planning issues that we face with regard to extensions and Alterations we believe the SPD needs to be given more weight, or the points brought into H5.

2. Clear consideration must be given to the local character and landscape setting when deciding on extensions etc as there have been many that are completely out of proportion to the existing environment. The policy could contain stronger reference to the need to preserve/maintain boundary clearances as this is the most frequent issue in this context that we deal with as a Parish Council.

3. The Green Belt SPD is long overdue - It was mentioned as being delivered as part of the Local Plan 2019. It needs to be given priority, as further guidance is needed for those wishing to extend or alter their homes with a view to staying in the Village, offering sensible enlargements to their family homes, yet they are continually refused.

4. Recent applications have caused issue in relation to the addition of a study or home office, where it actually meets the space standards for a bedroom, so this is actually

1. LPDMP Policy D5(4) states that development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential building separation distances. LPDMP Policy D4 (4) states that development proposals are expected to demonstrate high quality design at the earliest stages of the design process, and then through the evolution of the scheme, including in relation to...b) Form and scale of buildings and spaces - height, bulk, massing, proportions, profile and roofscapes. Some rear dormer windows or roof extensions are classed as permitted development so outside the scope of this policy. The Residential Alterations and Extensions SPD supplements adopted policy and cannot be given 'more weight'. LPDMP Policy H5 is complementary to the Residential Alterations and Extensions SPD and together they provide the decision maker and applicants with clear policy and guidance. The reasoned justification to policy H5 highlights the importance of the SPD in paragraph 2.7 which states that 'regard must also be had to the Residential Alterations and Extensions SPD 2018...which gives additional detailed guidance.'

2. Part 1 a) of LPDMP Policy H5 specifically refers to development proposals respecting the existing context, scale height, design, appearance and character of the immediate surrounding area. LPDMP Policy D4 3) states that development proposals should respond positively to the...surrounding context...prevailing character, landscape and part 4) d) states that development proposals are expected to demonstrate high quality design...including in relation to...hard landscape and soft landscape. Residential Alterations & Extensions SPD, 2018 gives guidance on distance of side extensions from boundaries (page 21).

	<p>manipulating the housing mix policies in our neighbourhood Plan and also GBC's Local Plan as well as the SHMA. Whilst this policy is for existing homes, once a new house is built we are experiencing a high number of 'non-material amendments' whereby the internal layouts are being changed to accommodate a fourth or even a fifth bedroom. This needs addressing through this policy. The issue of manipulating housing mix policies through the addition of supposed studies and home offices needs consideration whereby non-material amends are submitted as houses are being built.</p>	<p>3. The Green Belt SPD is outside the scope of this policy.</p> <p>4. The Council cannot control which type of planning applications are submitted. Its role is to determine the applications put forward. The policies within the Local Plan are there to address concerns over the impact of a development proposal and refuse an application if it would have an unacceptable impact. The Council acknowledges that there has been a rise in planning applications for home offices during recent years due to the necessity and rise in working from home. It is also up to the home owner how they use the space and rooms within their house. The housing mix referred to in LPSS H1 is not meant to be used in a rigid way nor to be used as a reason to refuse extensions.</p>
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## Policy H6: Housing Conversion and Sub-division

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Highways England</b>	Left blank
Left blank	<p>The parking implications on the immediate locality are explicitly addressed by Policies H6 and D9 and the supporting text. The cumulative impacts of development on the broader transport system aren't addressed. We recommend Guildford Borough Council actively monitor and manage residential infill and housing conversions with a view to pre-empting traffic issues stemming from the cumulative effects. 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.</p>	<p>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. The adopted LPSS Policy ID3: Sustainable transport for new developments is relevant. This requires, at point (6), that 'New development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable, including the mitigation of its otherwise adverse material impacts, within the context of the cumulative impacts of approved developments and site allocations. This mitigation: (a) will maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authorities, ...'</p>
Left blank	<b>Environment Agency (Thames Area)</b>	Left blank
Left blank	We have reviewed the Draft Guildford Borough Local Plan: Development Management Policies Proposed Submission	Comments welcomed.

	<p>Local Plan, January 2022 alongside the Guildford borough Local Plan: development management policies Issues, Options and Preferred Options - Consultation and Duty to Cooperate Statement, January 2022 and our advice on and suggestions to policies H5, H6, P6, P7, P8, P9, P10, P12, P13, D11, D12, D13, D14, ID6, ID7 and ID10 as in our letter of 20 July 2020 have been applied. We acknowledge and accept the justifications made where the changes we suggested could not be applied.</p>	
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### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Burpham Neighbourhood Forum</b>	
Left blank	<p>We recommend that the wording of 1c is tightened to ensure that 'sufficient' means specific reference to Neighbourhood Plan requirements and SPDs to ensure adopted minimum standards are adhered to.</p>	<p>The Reasoned Justification to the policy already provides reference to relevant and associated policies and SPD regarding sufficiency in relation to these elements (see for example para 2.21, 2.24 and 2.26-2.27. Paragraph 1.16 references Neighbourhood Plans.</p> <p>The planning officer would refer to both the relevant neighbourhood plan and SPD when determining a planning application. 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. Replication in the Local Plan would not appear to be necessary.</p>



Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	The terms 'acceptable or unacceptable' in planning terms are vague. In addition to ensuring conversions do not harm the character of the locality they should also not harm the character of the property.	The terms 'acceptable or unacceptable' are frequently used when making a planning decision. When dealing with conversions and subdivisions these tend to be internal alterations where there is less impact on the character of the property. Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness requires high quality design, including in relation to appearance.
Left blank	<b>Guildford Greenbelt Group</b>	Left blank
Left blank	<p>1. This policy needs to emphasise that this is for existing homes, as opposed to new homes - there is a statement included, but this would benefit from being highlighted in bold.</p> <p>2. Add to point b in the policy impact on street scene as it is not just character.</p> <p>3. Within the policy it would be helpful to add that there should not be an unacceptable impact on the amenity of neighbouring residents in terms of privacy and access to sunlight and daylight (point expanded to match the same point in H5).</p>	<p>1. To highlight the text would contradict the style of the document and cause confusion, as it is headings and sub-headings that are in bold text. The policy title 'housing conversion and sub-division' implies that it applies to existing housing as you can not convert or sub-divide a proposed home</p> <p>2. Conversions and subdivisions involve internal alterations which happen within the existing envelope of the building and have less impact on the street scene. The wording in 1a protects the character of the immediate locality which would include street scene, as stated in para 2.19 'Immediate locality relates to nearby properties within the street scene and reflects the area that could be impacted by the proposal.'</p> <p>3. As conversions and subdivisions tend to be internal alterations they have less impact on neighbours amenity as the building is already in-situ. Amenity is addressed in Policy D5: Protection of Amenity and Provision of Amenity Space which addresses access to sunlight and daylight.</p>
Left blank	<b>Guildford Residents Association</b>	Left blank

Left blank	<p>1.This policy is insufficient for a university town. More emphasis should be placed on cumulative effects and limits should be set for the proportion of HMOs in some areas.</p> <p>2. After H6 1c) add:1d) vulnerability to flooding of occupants would not be increased.</p> <p>3. Reasoned Justification 2.26 insert: “Providing sufficient well sited <b><i>and landscaped</i></b> parking is an important consideration...”</p>	<p>1. HMO’s are addressed in Policy H1: Homes for all which states that the balance of housing types and character of immediate locality must not be adversely affected. Currently small scale HMO’s of less than 6 people are classed as permitted development. Article 4 Directions, which would restrict permitted development rights, are outside the scope of the policy. <u>Article 4 directions</u> 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>2. Proposed policy P13: Sustainable surface water management and existing policy P4: Flooding, flood risk and ground water protections zones address the issue of flooding.</p> <p>3. Landscaping is considered separately by Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness.</p>
Left blank	<b>Guildford Society</b>	Left blank
Left blank	<p>1. The policy should have a 1 d) statement that covers the quality of conversion and sub-division.</p> <p>2.This needs to ensure that matters such as floor to ceiling heights, area of glazing, thermal insulation, thermal gain, sound transmission, safe and attractive common parts etc. are to a high and futureproof residential standard. Where a building was originally constructed for non-residential purposes, this can become even more crucial.</p>	<p>1. Quality is addressed in detail in Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness.</p> <p>2. Policy D12: Sustainable and Low Impact Development requires development proposals to improve the energy efficiency and carbon emission rate of existing buildings to a level significantly better than the Council's adopted standards or national standards for new buildings. Policy D13: Climate Change Adaptation requires development proposals to demonstrate how new buildings will be designed and constructed to provide for the comfort, health, and wellbeing of current and</p>

		<p>future occupiers over the lifetime of the development, covering the full range of expected climate impacts.</p> <p>3. Noted and as mentioned outside the scope of the policy.</p>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	<p>1. The required amenity space needs quantifying, perhaps by reference to later sections of the document; if it is impossible to provide this on the site of the building to be converted the developer must arrange by purchase or agreement, extra new open space withing easy reach of the conversion. A robust communal maintenance arrangement must be provided and approved by the Council</p>	<p>1. The policy requires that sufficient amenity space is available, and this would be a consideration when determining a planning application. Policy D5: Protection of Amenity and Provision of Amenity Space addresses amenity space on new build developments but does not prescribe a minimum garden size as it is considered the qualitative standards are better at ensuring they are fit for purpose.</p>

## Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	<p>It is disappointing that this policy does not address the change of use between c3 to c4 HMO (house of multiple occupation) dwellings. And that a C4 direction is not adopted which would enable GBC to have discretion to control the number of private dwelling houses that are being converted into HMOs by requiring all new HMOS to have planning permission for C4 use.</p>	<p>Currently small scale HMO's of less than 6 people are classed as permitted development. Article 4 Directions, which would restrict permitted development rights, are outside the scope of the policy. 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). Article 4 directions do not stop development they require planning permission to be sought.</p>

Left blank	Sub-dividing or converting a large house into HMO can result in a far greater increase in numbers of people in an area. The impact of this on local transport infrastructure does not seem to be included at this point.	Policy ID11: Parking standards sets out parking standards for new developments, whilst LPSS Policy ID3: Sustainable transport for new developments 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.
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DRAFT

## Policy H7: Review Mechanisms

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Barton Willmore LLP obo Martin Grant Homes</b>	Left blank
Left blank	Recommend that further details on the approach to calculating any additional contributions should be set out within Policy H7 or the supporting text including the following.	It is considered that the Policy and its supporting text includes the principles informing the approach to the review of viability including identifying any surplus that exists, which may provide for additional contributions toward affordable housing. Detail is provided at para 2.39 – 2.41 of the supporting text. Minor modifications are proposed to para 2.39 and 2.40 to add clarity regarding the details of the Council's approach. Further detail could be provided as part of SPD if it is considered necessary.
Left blank	Specify that the review will be based on a comparison between an updated viability appraisal (using the same methodology as that agreed as part of the application) and the appraisal completed as part of the application to identify whether the viability of the development has improved and if it is reasonable to require any additional contributions towards affordable housing provision. The use of the same	It is not intended that any full updated viability assessment should diverge in methodology from that submitted at the planning application stage, albeit that it would be seeking to review viability based on potentially updated inputs. However, a more limited formula-based approach may be agreed. The following minor modification is proposed to clarify the approach.

	<p>methodology is necessary if an accurate comparison is to be undertaken.</p>	<p>'2.39 At the point of review, applicants <del>would be required to should</del> submit an updated viability assessment consistent with the format <u>and methodology</u> submitted at planning application stage.' <u>Whilst such a full viability assessment using the same methodology as the original assessment may be best suited to the circumstances of the case, a more limited formula-based approach to the review, focussing on any changes to submitted values and build costs, may also be considered where this is agreed by the applicant and the Council.</u> The Council's costs associated with commissioning an independent review of this assessment will be met by the applicant. The approach should be agreed with the Council prior to submission of an updated viability assessment <u>with the terms set out at the time that planning permission is granted, usually as part of the Section 106 agreement.</u> <u>Any viability assessment should follow the government's recommended approach to assessing viability as set out in National Planning Guidance.</u></p>
<p>Left blank</p>	<p>It is vital that the formula for calculating any additional contribution takes into account any deficit at the time of the initial viability appraisal. Taking account of the uplift in value and uplift in development costs only could result in a development being required to pay a contribution before the scheme has reached a viable position.</p>	<p>It would not always be the case that there would be a deficit at the planning application stage. However, if it were agreed that there was a deficit, overcoming this can be taken into account in terms of the updated viability assessment referenced at Para 2.39 (including proposed minor modifications) and the approach agreed with the Council.</p>
<p>Left blank</p>	<p>To ensure that the formula used is robust, consistent with national policy and guidance and sound, it should be included within the draft Plan and subject to consultation and examination. As a minimum, the principles informing</p>	<p>It is considered that the Policy and its supporting text includes the principles informing the approach to the review of viability including identifying any surplus that exists, which may provide for additional contributions toward affordable housing. Detail is provided at para 2.39 – 2.41 of the supporting text.</p>

	<p>the approach to calculating any uplift and inputs to the formula should be specified within the Plan.</p>	<p>Minor modifications are proposed to para 2.39 and 2.40 to add clarity regarding the details of the Council's approach. Further detail could be provided as part of SPD if it is considered necessary.</p> <p>Further, the Council's approach is considered to be broadly in line with the Viability PPG which indicates that Plans should 'set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles.'</p>
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
2.39	<p>The policy should specifically mention the need for an independent assessor to undertake the review.</p>	<p>An independent review, and the Council's costs for such being met by the applicant, is already referenced in para 2.39.</p>
3a)	<p>Recommend the review should occur much earlier in the process and should start at, for example, 30% of sales or lease of market homes, not 75%.</p>	<p>Justification for the approach proposed in terms of timing is provided at para 2.37 and 2.38 including the advantages presented in terms of late-stage review, considering also that viability will have been assessed at planning application stage for relevant schemes.</p> <p>Further, an earlier, mid-stage review is proposed in addition to a late-stage review for large-scale phased development.</p> <p>Undertaking viability review at a very early stage (particularly on small/medium schemes) reflects the disadvantages of more limited evidence/data on actual costs/values being available at this point, along with relatively little time potentially having passed since an application viability</p>

		assessment – so the likelihood of there being a significant difference in the viability position is lower.
Left blank	<b>CBRE</b>	Left blank
2.30	Whilst a definition is provided that large-scale phased development constitutes schemes that deliver 500 or more residential units in a number of phases, further clarification should be added for strategic sites that where different landowners and applications are submitted this does not meet the threshold of a large-scale phased development. For example, planning permission for a 200 unit scheme would not trigger a mid-phase review.	<p>It is considered that further clarification of the definition of large-scale phased development is unnecessary.</p> <p>It already reflects that the scheme would need to be both of a certain scale (500 or more residential units) and in a number of phases for this requirement to be engaged.</p>
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	Any potential viability review of affordable housing ratios should be in the public domain and only permissible in exceptional circumstances.	<p>It is not considered necessary to specify this as national guidance exists on the matter which indicates that any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances.</p> <p>GBC make any documents related to the viability of a project available to the public. This is so they can be used as evidence if anyone wants to comment on the planning application. In exceptional circumstances, GBC may not publish all the documents. If this happened, GBC still make an executive summary of the viability assessment available in line with national guidance.</p>
Left blank	When affordable housing ratios are lower than agreed, the council should reserve the right to postpone development if	It is not considered that postponement of development could be justified in these circumstances. The approach proposed



	by doing so a greater level of affordable housing could be delivered in the future.	by the Policy H7 allows for viability review where provision of a lower level of affordable housing was agreed under LPSS Policy H2(6) to enable potentially increased contributions.
Left blank	<b>DP9</b>	Left blank
Left blank	<p>The policy should not result in uncertainty or adverse risk on the future deliverability of a site which could undermine the deliverability of a site as whole.</p> <p>Further detail and guidance should be provided within the policy itself or supporting text to provide additional clarity and certainty.</p>	<p>The viability review is intended to confirm that the assumptions at the point of planning permission (including relating to development costs and values) remain accurate and whether there is any surplus that might be used for (further) affordable housing provision, rather than to threaten delivery of the development or any allowance for developer profit (see para 2.40).</p> <p>It is considered that the Policy and its supporting text includes the principles informing the approach to the review of viability including identifying any surplus that exists, which may provide for additional contributions toward affordable housing. Detail is provided at para 2.39 – 2.41 of the supporting text. Minor modifications are proposed to para 2.39 and 2.40 to add clarity regarding the details of the Council's approach. Further detail could be provided as part of SPD if it is considered necessary.</p> <p>Further, the Council's approach is considered to be broadly in line with the Viability PPG which indicates that Plans should 'set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles.'</p>

Left blank	<b>Effingham Parish Council</b>	Left blank
General	Concern that this provision is open to abuse by developers: financial viability assessments require complex financial modelling expertise and contain very detailed information, most councils lack in-house capacity.	An independent review, and the Council's costs for such being met by the applicant, is already referenced in para 2.39.
Left blank	Developers may try to renegotiate when a development looks like it may underperform, impacting its viability after agreement on affordable housing requirements has been finalised.	Para 2.36 indicates that the implementation of viability review cannot result in a scheme providing a reduced level of planning obligations from that of the originally permitted scheme.
Left blank	If a scheme cannot or may not meet affordable housing requirements at the outset, it should not be approved.	Where there are sound reasons, the option to refuse schemes is open to the Council. However, LPSS Policy H2 allows for a justification by applicants for the need for viability assessment of schemes in line with para 57 of the NPPF. Should this be accepted, the Council will need to weigh the outcomes and implications of the viability assessment against all circumstances relating to the case as part of considering the acceptability of the proposal.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	Viability Statements should be made public in all cases – this should be mandated.	It is not considered necessary to specify this as national guidance exists on the matter which indicates that any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances.  GBC make any documents related the viability of a project available to the public. This is so they can be used as

		evidence if anyone wants to comment on the planning application. In exceptional circumstances, GBC may not publish all the documents. If this happened, GBC still make an executive summary of the viability assessment available.
Left blank	The Local Plan and recent windfall development proposals have a number of schemes of circa 200- 500 dwellings on restricted sites. Some of these schemes might be usefully used for mixed use development with 'public good' being provided. The policy should be clear that the council will consider affordable housing being delivered outside the site either by contributing to council schemes or the provision of other sites.	<p>It is considered that LPSS Policy H2(5), along with its supporting text, sufficiently addresses flexibility around off-site provision of affordable housing where the Council agrees this.</p> <p>In the case of a late-stage review resulting in a surplus available for further affordable housing contributions, it is considered that a financial contribution (payment in lieu) would be most practical, though there is flexibility in this regard as reflected in Policy H7(4) and para 2.37.</p>
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	The strategic sites need earlier reviews than 'mid-stage'.	<p>Based on the plan viability study undertaken, it is assumed that generally, strategic sites would not necessarily engage policy H7 (i.e. by not providing the min. of 40% affordable housing at planning application stage).</p> <p>Nevertheless, should this be the case, in terms of the proposed timing of viability reviews (mid-stage and late-stage) justification for the approach proposed is provided at para 2.37 and 2.38. This includes that mid-stage reviews provide an opportunity to secure affordable housing on-site as part of the later stages of the development. This is in addition to the requirement for late-stage reviews, along with viability assessment undertaken at the planning application stage.</p>

Left blank	<b>Quod obo Berkeley Homes Southern Ltd</b>	Left blank
Left blank	<p>The provision to consider viability is already part of the Local Plan (at LPSS Policy H2(6)) and there is no evidence to support the need for additional review mechanisms.</p>	<p>LPSS Policy H2 sets the required contribution for affordable housing provision. LPSS Policy H2(6) does enable the Council to consider permitting adjustment to the ordinarily required contribution, including reducing the overall number of affordable homes, provided developers satisfactorily demonstrate that providing such would not be economically viable.</p> <p>However, it is considered possible that viability of a scheme (as considered at the date that the planning permission was granted) may improve over time.</p> <p>It follows that if the underlying base assumption (viability assessments) that informed a reduced contribution to Affordable Housing at the point of granting permission (as per LPSS Policy H2(6)) reflects improved viability at a later point, that the Council should possess a mechanism that enables this changed circumstance to be measured and to provide benefit as an increased contribution toward the provision of affordable housing (up to what would ordinarily be required). Further, the Viability PPG is clear in enabling the inclusion of review mechanisms within Plans, indicating that 'Plans should set out circumstances where review mechanisms may be appropriate' as well as that they are a tool 'to strengthen local authorities' ability to seek compliance with relevant policies over the lifetime of the project.'</p> <p>The context of affordable housing need in the borough provides a strong basis for securing all justified contributions</p>

		toward meeting this need, including through the use of review mechanisms.
Left blank	<p>There is a lack of reflection of a specific set of circumstances in which review mechanisms will be required, instead providing a blanket approach which allows the Council to impose additional reviews at its discretion with no justification. The lack of clear criteria for requiring review mechanisms results in draft policy H7 being contrary to the PPG and to paragraph 16.d) of the NPPF.</p>	<p>It is considered that the Policy, including at H7(1), does set out circumstances where a review mechanism may be appropriate in line with the Viability PPG. It is accepted that the policy would allow the Council to require a review mechanism for schemes where reduced affordable contributions are justified on viability grounds at the time of the planning application. This approach is not unique to the Council.</p> <p>‘Additional reviews’ are only proposed to occur in line with the policy, at a specific point (or points, for large-scale phased development) in the implementation of the scheme.</p> <p>It is acknowledged that there may be (likely limited) exceptions where the general Policy H7(1) requirement for a (late-stage) review mechanism may not be suitable. Context for a decision on appropriateness of such a review is reflected at para 2.33. This points to an agreement by the Council that the circumstances of the case limit the potential for additional contributions. An example is provided in the supporting text</p>
1)	<p>Review mechanisms are ordinarily only required for very large, multi-phased schemes delivered over many years, such as garden towns, where there can be difficulty in forecasting costs /values at the planning application stage.</p>	<p>It is not considered that viability review should be limited only to very large, multi-phased schemes. It is recognised however that these types of scheme may present more frequent opportunity both for testing of viability (due to their generally long delivery timescale) as well as delivery of potentially increased levels of affordable housing on-site. This is reflected by draft Policy H7.</p>

	<p>The introduction of late stage reviews for smaller residential and mixed-use schemes would be disproportionate and create uncertainty for developers and investors, which could adversely impact on housing delivery. On a scheme where viability is finely balanced, the need to pause construction and undertake a further assessment of viability would add both unnecessary time and cost to the developer, and delay the delivery of housing.</p> <p>This would be exacerbated in the event that the Council disagrees with the viability conclusions of a late-stage review, and further detailed assessment and negotiation is required. There is no guidance as to what would happen in such a scenario.</p>	<p>On smaller schemes, it is not considered that construction would necessarily need to be paused as a result of the need to conduct an updated viability assessment. The policy requires only that the review be undertaken prior to the sale or lease of 75% of the market homes, or at an agreed similar point. Further as the contribution will generally be by payment in lieu in such cases (inclusion of further on-site units is likely to be impractical at this point in the development process), it is not considered that this would delay the construction process.</p> <p>At the point of a late stage review, there will be increased certainty regarding actual development costs and values (one of the benefits of this approach and its timing). Therefore, it is considered that the risk of disagreement would be low as any changes to costs and values should be more easily evidenced at this point by referring to actual rather than projected figures.</p>
2.36	<p>The policy does not allow for worsening viability. It would be appropriate for the Council to drop the policy or to only consider review mechanisms which operate in either direction.</p>	<p>It is not considered appropriate that the review mechanisms should allow for worsening viability (and potentially still lower contributions to affordable housing).</p> <p>The Council's approach is considered to be in line with the Viability PPG, which states that 'as the potential risk to developers is already accounted for in the assumptions for developer return in viability assessment, realisation of risk does not in itself necessitate further viability assessment or trigger a review mechanism. Review mechanisms are not a tool to protect a return to the developer, but to strengthen</p>

		<p>local authorities' ability to seek compliance with relevant policies over the lifetime of the project.'</p> <p>Paragraph: 009 Reference ID: 10-009-20190509</p> <p>Revision date: 09 05 2019.</p> <p>An applicant may choose to submit a further planning application to contend with any worsening viability of a scheme.</p>
Left blank	Request that draft policy H7 is removed.	The incorporation of a review mechanism in the LPDMP is considered to be enabled and supported by national planning policy and guidance. Its removal would weaken the Council's ability to seek increased contributions to affordable housing, where these might be justified by improvement in scheme viability.
Left blank	<b>Quod obo Portland Capital</b>	Left blank
General	The policy should recognise there may be circumstances where a review is not appropriate – for example where the applicant has committed to overprovide affordable housing upfront. Failure to do so will remove the incentive for applicants to provide more affordable housing than is technically viable. This would significantly reduce the number of affordable homes delivered over the plan period.	<p>It is understood that the comment may relate to specific circumstances, such as where an applicant makes a 'without prejudice' offer of affordable housing despite the scheme showing a (potentially agreed) deficit. It is considered that this scenario would not necessarily mean that viability review is inappropriate as a full viability assessment at review stage would account for any agreed deficit (along with any affordable housing already provided).</p> <p>Nevertheless, it is acknowledged that there may be (likely limited) exceptions where the general Policy H7(1) requirement for a (late-stage) review mechanism may not be</p>

		<p>suitable. Context for a decision on appropriateness of such a review is reflected at para 2.33. This points to an agreement by the Council that the circumstances of the case limit the potential for additional contributions. An example is provided in the supporting text.</p>
Left blank	<p>Any surplus identified by the review must be shared equally (50/50) between the developer and the council to ensure there is sufficient incentive for the developer to maximise the viability of the scheme. Failure to take a shared approach will reduce the amount of affordable housing delivered via review mechanisms over the plan period.</p>	<p>As indicated above, if it were agreed that there was a deficit at planning application stage, overcoming this can be taken into account in terms of the updated viability assessment referenced at Para 2.39 (including proposed minor modifications) and the approach agreed with the Council. A full viability assessment at review stage would include allowance for developer profit on any changes in value consistent with the allowance at planning application stage.</p> <p>In such circumstances, it is not considered that any surplus identified need be shared (equally) as suggested.</p>
Left blank	<p>The policy should also include flexibility for a lower cap to be agreed where considered appropriate (e.g. if the scheme is providing significant social infrastructure).</p>	<p>LPSS Policy H2(6) already provides for flexibility in terms of the level of contribution to affordable housing, based on satisfactory demonstration that this level of provision would not be economically viable.</p> <p>The review mechanism seeks to consider whether an updated viability assessment reflects a surplus that could provide an increased the contribution to affordable housing from what was secured at the time the scheme was consented. The level of potential increased contribution would be informed by this updated viability assessment process and whilst being capped, does not presuppose that this cap would be reached. In that sense there is already flexibility built into the policy.</p>



Left blank	<b>Savills obo Bloor Homes</b>	Left blank
Left blank	<p>GBC should provide evidence to show whether late stage reviews do generally result in additional contributions being obtained and whether the characteristics of the development allocated / likely to come forward in compliance with in the LPSS, would be of the type that would be appropriate for late stage reviews.</p>	<p>The Viability PPG is clear in enabling the inclusion of review mechanisms within Plans, indicating that ‘Plans should set out circumstances where review mechanisms may be appropriate’ as well as that they are a tool ‘to strengthen local authorities’ ability to seek compliance with relevant policies over the lifetime of the project.’</p> <p>The Council sees no reason why the use of a review mechanism should not be included in the Plan, even if it is used infrequently, in line with what evidence suggests in relation to the suitability of policies in viability terms. Further, it is considered that adopting the approach would be beneficial in terms of confidence in the planning system and as part of decision-making at application stage as it will provide reassurance that improvement in viability, should it occur, will result in improved contributions.</p> <p>Finally, there is a pressing need for affordable housing in the borough and it is considered appropriate that the Council has this mechanism available within its Local Plan Policies to support it seeking justified further contributions toward affordable housing provision. This is the case, even if further contributions do not always result after conducting such review in particular cases.</p>
Left blank	<p>A late stage review would result in additional consultant costs to applicants after planning permission is granted. The risk that an additional and unknown level of contribution could be sought following planning permission creates</p>	<p>Should a viability assessment be agreed at planning application stage, any ‘high development and infrastructure costs’ would have been taken into account, along with any</p>

	<p>uncertainty. This could jeopardise the delivery of development and the willingness to proceed on developments where there are known high development and infrastructure costs.</p>	<p>assumptions regarding consulting costs, including those related to viability review.</p> <p>The viability review is intended to confirm that the assumptions at the point of planning permission (including relating to development costs and values) remain accurate and whether there is any surplus that might be used for (further) affordable housing provision, rather than to threaten delivery of the development or any allowance for developer profit (see para 2.40).</p>
<p>Left blank</p>	<p>The draft policy says it will seek review mechanisms where the council considers it appropriate; this is not specific and open to interpretation.</p> <p>The circumstances whereby late stage reviews would be appropriate are not clearly identified. The policy can be improved by including criteria as to when late stage viability review would be inappropriate. Paragraph 2.33 of the supporting text of the draft policy, does recognise that there may be certain developments where the potential for additional contributions is likely to be limited by the circumstances of the case. The policy should provide specific criteria or examples where this would be the case.</p>	<p>It is considered that the Policy, including at H7(1), does set out circumstances where a review mechanism may be appropriate in line with the Viability PPG. It is accepted that the policy would allow the Council to require a review mechanism for schemes where reduced affordable contributions are justified on viability grounds at the time of the planning application. This approach is not unique to the Council.</p> <p>It is acknowledged that there may be (likely limited) exceptions where the general Policy H7(1) requirement for a (late-stage) review mechanism may not be suitable. Context for a decision on appropriateness of such a review is reflected at para 2.33. Para 2.33. This points to an agreement by the Council that the circumstances of the case limit the potential for additional contributions. An example is provided in the supporting text.</p>

	<p>If the policy is not improved in this way, then determining whether a late stage review process is appropriate to be secured as part of a planning permission would be a subjective decision, which could be a matter for protracted dispute and uncertainty for the applicant during the planning application stage.</p>	<p>The basis for securing a review mechanism is considered to be sufficiently clear. The basis for any possible exception due to potential inappropriateness would need to be considered on a case-by-case basis at planning application stage. This would have the application stage viability assessment (which may seek to demonstrate the basis why the circumstances of the case limit the potential for any additional contributions) as well as the Council's independent appraisal of this assessment as context for a decision. It is not considered that this would lead to any further significant protraction, or uncertainty in relation to the process than might already be the case.</p>
<p>Left blank</p>	<p>Neither the policy or the supporting text sets out a clear process and terms of engagement regarding how the viability would be reassessed over the lifetime of the development.</p> <p>The policy should detail how the deferred contribution is to be calculated. Paragraph 2.40 of the supporting text of draft Policy H7 only refers to development value and build costs, which is considered to be too simplistic.</p>	<p>The Policy is considered to include detail in line with the Viability PPG. In addition to setting out circumstances where review mechanisms may be appropriate (see H7(1)), it is considered that the policy sets out a clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance. Process elements are outlined in policy, including what the Council will seek as part of the viability review, the trigger point for such (a) review/s based on the scale of the development, the nature of and cap to the contribution. Further detail is provided in the supporting text for clarity on the process and terms of engagement for viability review.</p> <p>It is considered that the Policy and its supporting text includes the principles informing the approach to the review of viability including identifying any surplus that exists, which may provide for additional contributions toward affordable housing. Detail is provided at para 2.39 – 2.41 of the supporting text. Minor modifications are proposed to para 2.39 and 2.40 to</p>

		<p>add clarity regarding the details of the Council's approach. Further detail could be provided as part of SPD if it is considered necessary.</p>
Left blank	<p>It is important that calculations take account of any deficit that schemes may be in at the outset, and not just any uplifts in value and build cost. Otherwise, the developer may be required to pay a contribution before the scheme has reached a viable position.</p>	<p>It would not always be the case that there would be a deficit at the planning application stage. However, if it were agreed that there was a deficit, overcoming this can be taken into account in terms of the updated viability assessment referenced at Para 2.39 (including proposed minor modifications) and the approach agreed with the Council.</p>
Left blank	<p>The calculation should also take account of the uplift in all relevant costs, not just build cost. Otherwise, this could mean that a developer could be liable for a contribution when a scheme remains unviable as uplifts in other costs, such as financing, are not taken into account.</p> <p>On this basis, it is considered that any review should comprise a full review of the viability using the same methodology as the original viability appraisal submitted with the planning application. The findings of the two appraisals should then be compared to identify whether the viability of the development has improved and it is</p>	<p>A minor modification is proposed to Para 2.40 to clarify that the 'review will <b>include</b> assessing changes to...development costs...' It is considered that the options in relation to the approach to viability review (including a full viability assessment at the point of review) provides the scope to reflect change in broader development costs following planning permission. It remains likely that changes occur in relation to values and build costs from those reflected the point of planning permission and an approach focussing on these may also be considered where this is agreed by the applicant and the Council (see minor modification proposed to para 2.39).</p> <p>It is not intended that any full updated viability assessment should diverge in methodology from that submitted at the planning application stage, albeit that it would be seeking to review viability based on potentially updated inputs. However, a more limited formula-based approach may be agreed. The following minor modification is proposed to clarify the approach.</p>

	<p>reasonable to require any financial contributions towards affordable housing provision.</p>	<p>'2.39 At the point of review, applicants <u>should</u> submit an updated viability assessment consistent with the format <u>and methodology</u> submitted at planning application stage.' <u>Whilst such a full viability assessment using the same methodology as the original assessment may be best suited to the circumstances of the case, a more limited formula-based approach to the review, focussing on any changes to submitted values and build costs, may also be considered where this is agreed by the applicant and the Council.</u> The Council's costs associated with commissioning an independent review of this assessment will be met by the applicant. The approach should be agreed with the Council prior to submission of an updated viability assessment <u>with the terms set out at the time that planning permission is granted, usually as part of the Section 106 agreement.</u> <u>Any viability assessment should follow the government's recommended approach to assessing viability as set out in National Planning Guidance.</u></p>
<p>Left blank</p>	<p>The policy must include detailed information as to how and when the review calculation will be undertaken.</p>	<p>It is considered that the Policy and its supporting text includes the principles informing the approach to the review of viability including identifying any surplus that exists, which may provide for additional contributions toward affordable housing. Detail is provided at para 2.39 – 2.41 of the supporting text. Minor modifications are proposed to para 2.39 and 2.40 to add clarity regarding the details of the Council's approach. Further detail could be provided as part of SPD if it is considered necessary.</p> <p>Further, the Council's approach is considered to be broadly in line with the Viability PPG which indicates that Plans should 'set out circumstances where review mechanisms may be</p>

		<p>appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles.'</p>
Left blank	<b>Savills obo St Edward Homes Ltd</b>	Left blank
Left blank	<p>GBC should provide evidence to show whether late stage reviews do generally result in additional contributions being obtained and whether the characteristics of the development allocated / likely to come forward in compliance with in the LPSS, would be of the type that would be appropriate for late stage reviews.</p>	<p>The Viability PPG is clear in enabling the inclusion of review mechanisms within Plans, indicating that 'Plans should set out circumstances where review mechanisms may be appropriate' as well as that they are a tool 'to strengthen local authorities' ability to seek compliance with relevant policies over the lifetime of the project.'</p> <p>The Council sees no reason why the use of a review mechanism should not be included in the Plan, even if it is used infrequently, in line with what evidence suggests in relation to the suitability of policies in viability terms. Further, it is considered that adopting the approach would be beneficial in terms of confidence in the planning system and as part of decision-making at application stage as it will provide reassurance that improvement in viability, should it occur, will result in improved contributions.</p> <p>Finally, there is a pressing need for affordable housing in the borough and it is considered appropriate that the Council has this mechanism available within its Local Plan Policies to support it seeking justified further contributions toward affordable housing provision. This is the case, even if further</p>

		contributions do not always result after conducting such review in particular cases.
Left blank	<p>A late stage review would result in additional consultant costs to applicants after planning permission is granted. The risk that an additional and unknown level of contribution could be sought following planning permission creates uncertainty. This could jeopardise the delivery of development and the willingness to proceed on developments where there are known high development and infrastructure costs.</p>	<p>Should a viability assessment be agreed at planning application stage, any 'high development and infrastructure costs' would have been taken into account, along with any assumptions regarding consulting costs.</p> <p>The viability review is intended to confirm that the assumptions at the point of planning permission (including relating to development costs and values) remain accurate and whether there is any surplus that might be used for (further) affordable housing provision, rather than to threaten delivery of the development or any allowance for developer profit (see para 2.40).</p>
Left blank	<p>The draft policy says it will seek review mechanisms where the council considers it appropriate; this is not specific and open to interpretation.</p> <p>The circumstances whereby late stage reviews would be appropriate are not clearly identified. The policy can be improved by including criteria as to when late stage viability review would be inappropriate. Paragraph 2.33 of the supporting text of the draft policy, does recognise that there may be certain developments where the potential for additional contributions is likely to be limited by the</p>	<p>It is considered that the Policy, including at H7(1), does set out circumstances where a review mechanism may be appropriate in line with the Viability PPG. It is accepted that the policy would allow the Council to require a review mechanism for schemes where reduced affordable contributions are justified on viability grounds at the time of the planning application. This approach is not unique to the Council.</p> <p>It is acknowledged that there may be (likely limited) exceptions where the general Policy H7(1) requirement for a (late-stage) review mechanism may not be suitable. Context for a decision on appropriateness of such a review is reflected at para 2.33. Para 2.33. This points to an agreement by the Council that the circumstances of the case limit the potential</p>

	<p>circumstances of the case. St Edward consider that the policy should provide specific criteria or examples where this would be the case.</p> <p>If the policy is not improved in this way, then determining whether a late stage review process is appropriate and secured as part of a planning permission would be a subjective decision, which could be a matter for protracted dispute and uncertainty for the applicant during the planning application stage.</p>	<p>for additional contributions. An example is provided in the supporting text.</p> <p>The basis for securing a review mechanism is considered to be sufficiently clear. The basis for any possible exception due to potential inappropriateness would need to be considered on a case-by-case basis at planning application stage. This would have the application stage viability assessment (which may seek to demonstrate the basis why the circumstances of the case limit the potential for any additional contributions) as well as the Council's independent appraisal of this assessment as context for a decision. It is not considered that this would lead to any further significant protraction, or uncertainty in relation to the process than might already be the case.</p>
Left blank	<p>The North Street Regeneration (LPSS Site Allocation Policy A5) includes requirements for significant improvements to important facilities within the town centre, including new public realm, new bus interchange, pedestrianisation, highways works.</p> <p>These enhancements will be at significant development cost, as well as the enabling costs associated with a brownfield site within the town centre. For these reasons and because of the nature and type of the infrastructure requirements of the redevelopment it is high risk site from a development point of view. It is one of the circumstances whereby a late stage viability review process would be inappropriate as it increases the risk on the already high-</p>	<p>It is not presupposed that Policy H7 would be engaged by the proposal. Nevertheless, should a viability assessment be justified and agreed at planning application stage, any 'significant development costs' would be taken into account.</p> <p>The viability review is intended to confirm that the assumptions at the point of planning permission (including</p>



	<p>risk site, which could prevent the development from proceeding.</p> <p>It is also apparent that the potential for surplus funds during the lifetime of the development is likely to be limited as per the Council's viability evidence. A late stage review requirement would be significant risk to the development finances which may affect the delivery of this Site, including all of the wider public benefits and much needed new homes. Given the number of factors at play on this Site, it makes most sense for the position to be agreed at the time of determination of the application, so it is certain the Site can viably be delivered over its lifetime, without the risk of additional costs later in the programme.</p> <p>Furthermore, in order to achieve an acceptable margin on schemes that would not otherwise be viable, developers rely to some extent on growth in the market. A mechanism built to share this uplift therefore introduces further risk. Such mechanisms also limit the ability to finance the development which can prevent it proceeding at all, or increase finance costs, further impacting on viability.</p> <p>On this basis, St Edward seek an amendment to the policy to include text excluding Policy A5 from the requirements of Policy H7.</p>	<p>relating to development costs and values) remain accurate and whether there is any surplus that might be used for (further) affordable housing provision, rather than to threaten delivery of the development or any allowance for developer profit (see para 2.40).</p> <p>As noted above, viability review is not intended to threaten delivery of the development or any allowance for developer profit (see para 2.40), which accounts for risk. The scheme costs, including any public benefits provided, will be taken into account in viability assessment. An additional contribution is made only if the scheme is more viable at review stage than at the application review stage and in excess of a target profit.</p> <p>Policy H2 is applicable to the site in terms of required contributions to affordable housing (along with aspects related to viability). It is not considered justified to exclude to exclude Policy A5 from the requirements of Policy H7.</p>
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Left blank	<p>As an alternative, if the exclusion of Policy A5 from the requirements of Policy H7 is not accepted, it is suggested the policy should detail how the deferred contribution is to be calculated. Paragraph 2.40 of the supporting text of draft Policy H7 only refers to development value and build costs, which is considered to be too simplistic.</p>	<p>It is considered that the Policy and its supporting text includes the principles informing the approach to the review of viability including identifying any surplus that exists, which may provide for additional contributions toward affordable housing. Detail is provided at para 2.39 – 2.41 of the supporting text. Minor modifications are proposed to para 2.39 and 2.40 to add clarity regarding the details of the Council's approach. Further detail could be provided as part of SPD if it is considered necessary.</p> <p>Further, the Council's approach is considered to be broadly in line with the Viability PPG which indicates that Plans should 'set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles.'</p>
Left blank	<p>It is important that calculations take account of any deficit that schemes may be in at the outset, and not just any uplifts in value and build costs. Otherwise, the developer may be required to pay a contribution before the scheme has reached a viable position.</p>	<p>It would not always be the case that there would be a deficit at the planning application stage. However, if it were agreed that there was a deficit, overcoming this can be taken into account in terms of the updated viability assessment referenced at Para 2.39 (including proposed minor modifications) and the approach agreed with the Council.</p>
Left blank	<p>The calculation should also take account of the uplift in all relevant costs, not just build cost. Otherwise, this could mean that a developer could be liable for a contribution when a scheme remains unviable as uplifts in other costs, such as financing, are not taken into account.</p>	<p>A minor modification is proposed to Para 2.40 to clarify that that the 'review will <u>include</u> assess<u>ing</u> changes to...development costs...' It is considered that the options in relation to the approach to viability review (including a full viability assessment at the point of review) provides the scope to reflect change in broader development costs following planning permission. It remains likely that changes occur in</p>

On this basis, it is considered that any review should comprise a full review of the viability using the same methodology as the original viability appraisal submitted with the planning application. The findings of the two appraisals should then be compared to identify whether the viability of the development has improved and it is reasonable to require any financial contributions towards affordable housing provision

relation to values and build costs from those reflected the point of planning permission and an approach focussing on these may also be considered where this is agreed by the applicant and the Council (see minor modification proposed to para 2.39).

It is not intended that any full updated viability assessment should diverge in methodology from that submitted at the planning application stage, albeit that it would be seeking to review viability based on potentially updated inputs. However, a more limited formula-based approach may be agreed. The following minor modification is proposed to clarify the approach.

'2.39 At the point of review, applicants should submit an updated viability assessment consistent with the format and methodology submitted at planning application stage.' Whilst such a full viability assessment using the same methodology as the original assessment may be best suited to the circumstances of the case, a more limited formula-based approach to the review, focussing on any changes to submitted values and build costs, may also be considered where this is agreed by the applicant and the Council. The Council's costs associated with commissioning an independent review of this assessment will be met by the applicant. The approach should be agreed with the Council prior to submission of an updated viability assessment with the terms set out at the time that planning permission is granted, usually as part of the Section 106 agreement. Any viability assessment should follow the government's recommended approach to assessing viability as set out in National Planning Guidance.

Left blank	<b>Savills obo Taylor Wimpey</b>	Left blank
Left blank	TW would wish to prepare any required further evidence of viability / infrastructure delivery should the Dixon Searle evidence be debated at Examination, relevant to Policies H7 and H8. This is relevant in respect of the overall cost burden of planning gain in addition to affordable housing, and all relevant for Section 106.	Noted. Should this matter be raised by the Inspector in their 'Matters, Issues and Questions', then there will be an opportunity for those who submitted comments to the Regulation 19 LPDMP to submit hearing statements in relation to these matters.
Left blank	<b>Shanly Homes</b>	Left blank
Left blank	The policy as drafted seems arbitrary in that it would allow the Council simply to use its discretion to determine whether a review mechanism is required or not. This would effectively allow the Council to insist on a review mechanism for every scheme involving viability.	<p>It is considered that the Policy, including at H7(1), does set out circumstances where a review mechanism may be appropriate in line with the Viability PPG. It is accepted that the policy would allow the Council to require a review mechanism for schemes where reduced affordable housing contributions are justified on viability grounds at the time of the planning application. This approach is not unique to the Council.</p> <p>It is acknowledged that there may be (likely limited) exceptions where the general Policy H7(1) requirement for a (late-stage) review mechanism may not be suitable. Context for a decision on appropriateness of such a review is reflected at para 2.33. This points to an agreement by the Council that the circumstances of the case limit the potential for additional contributions. An example is provided in the supporting text.</p>
Left blank	Such an approach which seemingly ignores key considerations such as the size of the site and phasing and	The approach does not ignore site size and phasing. The policy differentiates between schemes that are large-scale phased development (where two viability reviews are required

	<p>seems unnecessarily punitive particularly in relation to small/medium scale developments.</p> <p>A more reasonable approach would be to consider review mechanisms in circumstances where larger scale developments are not commenced within an agreed time period (we have agreed 18/24months with other authorities).</p> <p>A blanket approach on all sites would essentially override the outcomes of often protracted viability discussions at application stage which would be at odds with the objectives of the viability process.</p>	<p>– at late- and mid-stage) and small and medium scale developments (where only one late-stage review is required). It is considered that this is a proportionate approach.</p> <p>Limiting viability review to only large-scale development would risk the Council not being able to seek further contributions to affordable housing from medium and smaller scaled development where there is justification to do so. The rationale for late-stage (rather than pre-commencement) viability review is set out at para 2.37.</p> <p>The intent of the viability review is not necessarily to override the outcomes of the application stage viability assessment. The viability review is intended to confirm that the assumptions at the point of planning permission (including relating to development costs and values) remain accurate and whether there is any surplus that might be used for (further) affordable housing provision. This is considered to be in line with the Viability PPG which indicates that they are a tool ‘to strengthen local authorities’ ability to seek compliance with relevant policies over the lifetime of the project.’</p>
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## Policy H8: First Homes

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Barton Willmore LLP on behalf of Martin Grant Homes</b>	Left blank
Left blank	<p>For clarity, we recommend that further details are provided within the supporting text relating to the tenure split likely to be sought, taking account of First Homes as well as other forms of affordable housing. This should provide an update on the split set out within Policy H2. To ensure that suitable and viable proposals are delivered, it may be necessary in some circumstances for an alternative tenure mix to be provided and so Policy H8 should include flexibility regarding tenure split and not seek to impose a specific requirement on all sites regardless of context.</p>	<p>Paragraph 65 of the NPPF states that, on major development, at least 10% of the total number of homes should be available for affordable home ownership. LPSS Policy H2 paragraph (4) requires 40% of all homes on a scheme to be affordable and the PPG requires 25% of all affordable housing units delivered under through planning obligations to be First Homes, so this 25% equates precisely to the NPPF's minimum 10% for affordable home ownership.</p> <p>The remaining 75% of affordable housing contributions may be divided among other types of affordable housing product, although there is a limit to flexibility as this element of the contribution would still need to take account of the tenure split in the Strategic Housing Market Assessment and referred to in Policy H2, paragraph (4), which is currently for at least 70% of the total affordable housing contribution to be in the form of affordable rented properties.</p>

		Paragraph 2.53 briefly explains this relationship between Policy H8 and Policy H2 where it states that the First Homes requirement will not impede the requirement in Policy H2, paragraph (4) for a minimum 70% affordable rent.
Paragraph 2.52	The proposal for local eligibility criteria to fall away after the first three months of marketing is welcomed to ensure that as wide a consumer base as possible is reached. In the event that there is evidence of low uptake from people who fulfil these criteria, they should be applied flexibly to developments, for example by reducing the timescales for which they apply, so as not to constrain the delivery of new housing.	We do not agree that there is a need for further flexibility as three months is not a long period to require the homes to be marketed only to residents fulfilling the local eligibility criteria and would ensure a reasonable amount of time for applications from these residents to come forward.
Left blank	<b>Quod on behalf of Portland Capital</b>	Left blank
Left blank	<p>Policy H8 should provide flexibility for an alternative approach to be agreed where fully justified.</p> <p>National planning policy is a material consideration only (not an absolute requirement). Other material considerations may support an alternative approach on certain sites. For example, local housing needs may support the need for more affordable types of ownership products (e.g. shared ownership). Viability/ deliverability evidence for schemes with large upfront infrastructure costs may demonstrate there is a need for the affordable housing to be forward funded (this is not possible with First Homes).</p>	<p>PPG: First Homes, Paragraph: 001 Reference ID: 70-001-20210524 requires at least 25% of affordable housing contributions on major development schemes involving housing to be First Homes. The remaining 75% may be split between other affordable housing products but there is a limit to flexibility as Policy H2, paragraph (4) requires at least 70% of the total affordable housing contribution to be affordable rented properties.</p> <p>Policy H8 has been subject to viability assessment; however, if subsequent evidence indicates that a proposed scheme would be unviable with the First Homes requirement, then it will be up to the developer to demonstrate this to be the case as per paragraph (6) of Policy H2. In such instances the Council could consider</p>

		variations to the tenure mix and/or number of affordable homes to be provided.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	The definition of Affordable Home is a price not exceeding £250,000 after the 20% discount, which cannot be considered affordable for most first time buyers.	The maximum amount that a First Home may be sold for is set by National Planning Practice Guidance, and for Guildford borough is £250,000 after the market discount of 30% is applied. First Homes will inevitably remain unaffordable for some people, however this maximum amount – which applies in all areas outside of Greater London – will make them a more affordable purchase option for many than other affordable housing products such as Discounted Market Sales and Shared Ownership, both of which are required to be sold at a lower minimum discount of 20% of market value, with no maximum ceiling price.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Policy H8, paragraph 4	<p>We are concerned that the wording of section 4 is ambiguous. I.e: Does it mean that a settlement of 40 homes, allows an additional 40 homes (the same as the size of the whole settlement) or the same size as the house next door? In either case it's simply not worded correctly and is very unclear.</p> <p>We recommend a specific area limit e.g., 1 acre as was found in the 2003 local plan for exception sites, and a specific reference to the need for new development to meet all other development control criteria.</p>	<p>Paragraph 4) of the policy relates to 'residential development proposals', which is intended to refer to the scale of the proposed scheme overall in relation to the adjacent settlement rather than the relative scale of individual buildings. The respondent's point is recognised, and we will propose a minor modification to improve clarity as follows: "...will be permitted where <u>the proposed scheme is they are:</u></p> <ul style="list-style-type: none"> <li>a) Adjacent to <u>an</u> existing settlements, and</li> <li>b) Proportionate in size to <del>it</del>them."</li> </ul> <p>We do not agree that an area limit for a First Homes exception site is necessary as neither the NPPF or PPG prescribe the need for such a limit and there is also no</p>



		<p>requirement, unlike for rural exception sites, that First Homes exception sites should be small. We therefore consider their size would be better assessed in as compared to adjacent settlement(s) and with reference to other Local Plan policies.</p>
Left blank	<b>Bloor Homes</b>	Left blank
Left blank	<p>The policy as worded is not positively prepared and could be made clearer, especially relating to where a housing mix has been previously agreed.</p> <p>Some outline planning permissions and/or S106 Agreements already set the tenure for affordable housing, and therefore influence future design and viability requirements for Reserved Matters Applications. As such, the policy wording should make reference to occasions whereby the affordable housing mix tenure has previously been agreed. This is particularly important as developers may have already agreed commercial terms with affordable registered providers in respect of a site that benefits from planning permission.</p> <p>As such, a requirement to revisit the affordable housing requirement secured in the permission could prejudice the agreement with the registered provider and ultimately the timely delivery of much needed affordable homes.</p> <p>In order to make the policy clearer in this respect, the following additional wording is suggested:</p>	<p>The transition period for decision making in the PPG (Paragraph: 020 Reference ID: 70-020-20210524), which was published in May 2021 was intended to take account of this problem. The First Homes requirement does not apply to sites with full or outline planning permission already in place or determined before 28 December 2021, or where there has been significant pre-application engagement and the full or outline permission has been determined prior to 28 March 2022. Therefore, we do not agree that the existing policy wording is not positively prepared or that the proposed additional wording is required to make it so.</p> <p>The situation to which the respondent refers would be considered in accordance with the above transitional periods to assess whether it fits under either of them. In cases where a full or outline application was determined after 28 March 2022, the application would fall outside of a transitional period and the policy should therefore apply.</p> <p>Should any instance arise where the First Homes requirement (in Policy H8, or the NPPG prior to adoption of the LPDMP) is not applied to an application that falls outside of a transitional period, there will no opportunity for the Council to require this later at the reserved matters stage.</p>

	<p><u>7) Where an affordable tenure mix has already been agreed through a S106 or an Outline permission, then this policy should not apply to subsequent reserved matters or amendments.</u></p>	
Left blank	<p><b>Thakeham Homes</b></p>	Left blank
Left blank	<p>Whilst it is noted that this draft policy reflects current Government guidance, the sector is still getting to grips with what First Homes actually means and how it will be implemented, whether this will be by Registered Providers or Local Authorities. The combined impact of this draft policy and adopted Policy H2 is that the shared ownership product will be lost, which will have a significant impact on Register Providers, who would normally wish to see some shared ownership retained as it provides a more flexible sale product, as the initial equity shares can be purchased at between 10-40%. First Homes cannot offer this.</p> <p>The minimum discount for First Homes is 30% and there is concern that this could be increased which would have a real impact on the deliverability and viability of a scheme, which in turn would reduce the overall quantum of affordable homes that are delivered within the Borough. Through our close working with many Registered Providers we know there currently remains limited appetite to acquire the First Homes product and therefore heavy reliance on this product should be carefully considered within the planning policy and the policy worded to be an either/or with shared ownership to allow flexibility and avoid drawn out negotiations.</p>	<p>The likely reduction in provision of shared ownership homes across the borough in future is an inevitable consequence of the requirement in the PPG for at least 25% of affordable housing contributions to be First Homes. There is however no means by which the Council could itself increase the 30% minimum discount without undertaking a review of Policy H8 as part of a Local Plan review, which would have to be subject to viability assessment alongside the impact of other planning obligations, as well as public consultation and examination.</p> <p>Policy H8 has been subject to viability assessment; however, if subsequent evidence indicates that a proposed scheme would be unviable with the First Homes requirement, then it will be up to the developer to demonstrate this to be the case as per paragraph (6) of Policy H2. In such instances the Council could consider variations to the tenure mix and/or number of affordable homes to be provided.</p>

Left blank	<b>St Edward</b>	Left blank
Left blank	<p>The policy as worded is not positively prepared and could be made clearer.</p> <p>Some brownfield sites which are compelled by policy to deliver new infrastructure have viability justification as to why they are unable to provide a policy compliant level of affordable housing. A line should be added to the policy to clarify this. The policy should be amended to include the following (additional text in red):</p> <p>A minimum of 25% of affordable homes provided either on-site or off-site or as a financial contribution in lieu of on-site provision in line with the Council's adopted affordable housing requirements are required to be First Homes, <u>unless a developer demonstrates that providing the amount of affordable housing required by Policy H2 would not be viable nor feasible for some other reason. In these cases, the provision of First Homes, if feasible, will be proportionate to the total amount of affordable housing provided.</u></p> <p>The inclusion of St Edward's suggested wording ensures that the policy is positively prepared, clear and consistent with GBC's Policy H2 of the adopted local plan. It is effective, as it avoids constraining the delivery of affordable homes.</p>	<p>The Local Plan is intended to be read as a whole and Policy H2, paragraph (6) already allows for reduction in provision of affordable housing and/or adjustment to the tenure split provided if the requirements of Policy H2 can be demonstrated to be unviable. There is no need to repeat this point in Policy H8.</p> <p>All policies in the Local Plan: Development Management Polices including Policy H8 have furthermore been viability tested, so it is anticipated that sites should be viable with at least the minimum provision of 25% of any affordable housing contribution as First Homes.</p>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank

Left blank	<p>There needs to be a prohibition of any extension of these homes for a period, perhaps 25 years so that their original purpose is maintained.</p>	<p>To use a Local Plan policy to prohibit a First Home from being extended would contravene permitted development rights. First Homes remain affordable in perpetuity regardless of whether they are later extended, as whilst extensions or other home improvements made by the initial purchaser are liable to increase a home's market value over time, any resale of the property will remain subject to the initial market discount as well as the maximum sale price indicated in the NPPG (currently £250,000 outside of Greater London, after the discount).</p>
Left blank	<b>Taylor Wimpey</b>	Left blank
Definitions, Paragraph 2.47	<p>TW support the principle of First Homes, however they have some comments on the policy has worded. In its present form it is not effective or positively prepared.</p> <p>As per paragraph 2.47, all of the initial sales after discount must be under £250,000, thus this is likely to result in a high number of one beds. If circa 25% of the affordable units were one beds, this would result in a high proportion of one bed units on larger strategic site. For example, a 2,000 unit scheme would have 200 one bed units if the affordable provision was 40%. It is possible there will not be demand for this level of one beds and in this instance, there should be a way to vary the percentage of one beds on future phases and increase the number of 2-3 bed units in lieu of first homes. Such a review mechanism could be added to policy H7 or the supporting text, and would allow for an appropriate scheme for the provision of affordable housing including First Homes, to be negotiated and agreed via Section 106.</p>	<p>To include a review mechanism for First Homes in the policy would not align with national policy. There is also no evidence that demand for these homes would not be high; on the contrary, the West Surrey Strategic Housing Market Assessment indicates high demand across the borough for 1 and 2-bedroom affordable homes of 40% and 30% respectively. Many people on the Council's housing waiting list will be first time buyers and likely to be attracted to the 30% discount and the maximum price cap of £250,000 in this area for these units.</p> <p>if the existence of the price cap (which is defined in the PPG) results in the majority or all of the First Homes being 1-bedroom properties, then the likely outcome is that there would be proportionately fewer 1-bedroom homes as part of the affordable rent (and potentially shared ownership) proportion of the affordable housing contribution, whilst the total number of 1-bedroom affordable homes would remain the same as if there</p>

	<p>It is suggested that paragraph 2.47 is update to include additional text:</p> <p><u>“...For major strategic sites allocated in the LPSS, following the first phase(s) of delivery, GBC will seek to negotiate a review mechanism in respect of the actual take up of First Homes, and where demand is notably absent, may seek a flexible approach to be undertaken re: type/ tenure of onward phases of affordable homes.”</u></p>	<p>were no policy requirement for First Homes. Nevertheless, taking the respondent’s example, even if all of the First Homes provided on site were 1-bedroom, the delivery of 200 1-bedroom First Homes, i.e., 25% of the 800 affordable units that would be required on site under LPSS Policy H2, would still remain within the desired SHMA mix to comply with Policy H2, paragraph (4). The difference would therefore simply be one of a different form of affordable tenure.</p> <p>Developers will in any case be at liberty to challenge any affordable housing requirement in line with Policy H2, paragraph (6), which allows the Council to consider variation to the required tenure mix and/or required overall number of affordable homes if it can be demonstrated that a policy compliant contribution would not be economically viable without making such adjustments.</p>
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	CPC agrees with the policy to set a minimum percentage of discounted housing in perpetuity for first time buyers and would like to see a criteria for all affordable housing.	Policy H8 is intended to be used to determine planning applications alongside Policy H2 of the LPSS. The latter covers general requirements for affordable housing provision, and a requirement to address the tenure mix in the Strategic Housing Market Assessment, which includes a minimum proportion of 70% homes for affordable rent. There are no other targets at present for other types of affordable housing, as these need to be evidence-based and the SHMA provides the latest evidence of local need.
Left blank	<b>Guildford Society</b>	Left blank

Left blank	<p>For all forms of affordable housing, it's essential that applicants agree to a post-construction review of the affordable housing contribution. This policy must be enforced as a matter of course since in negotiation developers are likely to make a final offer of an initial contribution provided there is no future review. Such concessions would be contrary to public policy because any concession would be seized upon as a precedent. This policy objective and non-negotiability should be made explicit.</p>	<p>The Council will expect provision of affordable housing contributions in line with LPSS Policy H2 (and LPDMP Policy H8 when adopted). Under Policy H2, developers would need to demonstrate that providing the affordable housing required would not be economically viable in order to benefit from an exemption. Policy H7: Review Mechanisms requires a review mechanism to be secured in such cases.</p>
Left blank	<p>To ensure that the price of first homes is not manipulated those units need to be identical to non-discounted units. Even so there is a risk that those receiving discount will agree a higher base price of those buying a similar non-discounted unit, thereby frustrating government policy. Monitoring land registry prices would be insufficient verification since various incentives are typically negotiated individually on each unit. Developers should be required to provide full disclosure of all terms in order to verify that the appropriate discount has been given and to verify that this form of affordable housing policy is effective.</p>	<p>The PPG on First Homes (Paragraph: 006 Reference ID: 70-006-20210524) confirms that First Homes should be physically indistinguishable from the equivalent market homes in terms of quality and size. It also explains that market value should be ascertained by means of a valuation from a registered valuer acting in an independent capacity, and that the valuation should be in accordance with RICS red-book valuation guidance for new-build homes. The sale price should only change following consideration of a mortgage or home purchase plan if the lender's valuation is lower than the agreed sale price.</p> <p>To improve the policy's clarity, a minor modification has been proposed to add a footnote to the definition for First Homes within the policy's supporting text to refer to the PPG's required method for establishing market value.</p>
Left blank	<p><b>Quod on behalf of Berkeley Homes</b></p>	Left blank
Left blank	<p>The inclusion of a policy for First Homes in the draft Local Plan is not opposed by BHSL but it requires additional text</p>	<p>The respondent's comment relates to the implementation of the policy and not to the proposed policy wording itself.</p>

to ensure planning applications already in the system are not prejudiced once the Local Plan is adopted.

Many residential and mixed-use schemes have to balance the provision of affordable housing of different types and tenures with the overall viability of the development. The nature of First Homes is such that developers typically waive 30% of the real market value of the First Home properties. Whilst a 30% reduction in value is generally unlikely to cause issues with viability, draft policy H8 requires a "*minimum discount of at least 30%*" (our emphasis). In situations where the First Homes discount rises above 30%, the viability of a scheme is more likely to be adversely affected. Therefore, should the First Homes policy be adopted by the Council prior to the determination of current schemes, it could impact on their viability, impacting on the balance and quantum of affordable housing and making these schemes less viable and potentially undeliverable.

Draft policy H8's introduction late in the determination period of such an application would be inappropriate, as it may result in the application being refused due to a lack of First Homes being provided, despite a concerted effort to ensure the best affordable outcome at the time of submission.

Consequently, we politely request that draft policy H8 is amended to only apply to applications for planning permission which are submitted to the Council following the adoption of the Local Plan Development Management Policies. This would avoid applications which have already

The 30% discount on market value for First Homes is a *minimum* discount, in accordance with the NPPG, however there is no obligation on developers within Policy H8 to price the homes at a discount higher than this, in the same way that there is no obligation to provide more than 40% affordable housing under LPSS Policy H2. Should the Council itself wish to increase the minimum discount, whether for specific areas of the borough or borough-wide, this would need to be through a future review of Policy H8, which would be subject to a revised viability assessment taking account of the impact of other planning obligations, as well as further public consultation and examination. There should therefore be no viability risk to current schemes of implementing this policy.

	<p>been subjected to rigorous financial viability assessment by both the developer and the Council from being made less viable, such that the development cannot be delivered and contribute to the Council's future housing stock.</p>	
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## Policy E11: Animal-related Development

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Ockham Parish Coucil</b>	Left blank
Policy Paragraph 1) d)	Para d) needs definition of how unacceptable neighbouring amenity will be determined.	<p>For light impacts, applications for development that has the potential to generate significant amounts of artificial lighting will be required to be accompanied by submission of a light impact assessment under Policy D10a: Light Impacts and Dark Skies. Noise impacts will also need to be determined through an assessment which quantifies the impact if a proposed development is considered a 'noise generating use', in line with Policy D10: Noise Impacts.</p> <p>Further information regarding the other amenity impacts covered by policy E11 that cannot be quantified in the same way as noise and light impacts (privacy, overlooking and odour) is provided in the supporting text to Policy D5: Protection of Amenity and Provision of Amenity Space. There are many factors that might affect whether one of these potential amenity impacts is deemed unacceptable, and determination of this will therefore need to depend upon the outcome of case-by-case planning judgment rather than</p>

		<p>applying a 'one-size-fits-all' system of measurement within the policy itself. 'General disturbance' is a term that could apply to other adverse effects not listed in the policy that might give rise to a potential amenity impact, such as volume of traffic, dust, and other forms of pollution.</p>
Left blank	<b>CPRE</b>	Left blank
<p>Policy paragraph 1) b)</p>	<p>We note the policy makes no reference to the need to protect the openness of green belt and areas of the countryside with no consideration given to the adverse impacts of development that is inappropriate to green belt. We suggest that Policy E11 (1) (b) be amended to state: "have no unacceptable impact on the nature conservation or biodiversity value of the site and the quality of pasture" [and no adverse impact on the openness of the Green Belt and countryside].</p>	<p>Protection of the Green Belt is already addressed in by LPSS Policy P2 and NPPF paragraphs 149 and 150, which Policy P2 refers to. There is no need to reiterate national policy, nor repeat part of Policy P2, as the development plan must be read as a whole.</p> <p>There is also no general requirement in national planning policy or guidance that open countryside that is not Green Belt should remain open, although LPSS policy P3 states that development within the area of countryside designated on the Policies Map should be justified, proportionate to the nature and scale of the site and its setting, and not increase physical or visual coalescence between Ash/Tongham and Aldershot or Ash Green village.</p>

## Policy P6/P7: Biodiversity in New Developments

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Defence Infrastructure Organisation</b>	Left blank
Policy para 12	<p>Whilst the MOD will aim to accord with the provisions in the Environment Act in respect of Biodiversity Net Gain; there is a concern that setting the minimum level at 20% for all qualifying development may have the effect of limiting the scope to make provision for the necessary development on the MOD sites in the Local Plan area and therefore having National Security impacts. In addition, the fact that it does not recognise the considerable amount of work that the MOD has been doing in the area to enhance biodiversity through its stewardship work over the years, introduces a perverse incentive to consider halting such work and therefore will run entirely contrary to the aims of the Local Plan.</p>	<p>The point about the MODs previous work enhancing biodiversity and its contribution to Biodiversity Net Gain (BNG) is noted. However, it would not be appropriate for planning policy to single out specific applicants for preferential treatment, e.g. through a reduced BNG target. Biodiversity enhancement works undertaken by the MOD, if done through the appropriate process as set out in the Environment Act, can be used as offsite BNG for future development.</p>
Policy para 12	<p>Further, whilst we note the references in the text to the methodologies and characteristics of areas, there does not appear to be a clear evidence base merely the reference in para 3.47 of the supporting document relating to achievability and costs, and a impact assessment estimating a low confidence level of meeting 10%, instead of demonstrating</p>	<p>A full justification for the higher requirement is set out in paragraphs 3.47-3.55 of the Natural Environment Topic Paper. The 20% figure was chosen because the impact assessment<sup>1</sup> produced by the government in 2019 to support the draft Environment Bill tested two standards –</p>

<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/839610/net-gain-ia.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf)

	how the figure of 20% was calculated including taking into account the enhancement work undertaken, and therefore whether it is appropriate in respect of the MOD sites. The approach is therefore questioned, and we seek a clearer evidence base for the approach to be provided before such a blanket policy be adopted.	10% and 20%. The topic paper sets out the reason for rejecting the 10% standard locally.
Left blank	<b>Environment Agency</b>	Left blank
Left blank	Support the policy.	Left blank

## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Union 4 planning</b>	Left blank
Policy para 16	Whilst we strongly support the principle of biodiversity gain through development, it should be recognised that constraints related to the specific nature of the proposals may inhibit on-site improvements. In such scenarios, offsite improvements should be considered, as suggested at part 16 of this condition.	The new national BNG approach and the policy allow for offsite works where a full gain cannot be achieved onsite.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	We would like to see the Local Nature Biodiversity Strategy, but it has yet to be prepared.	The Secretary of State has not yet appointed the responsible authority that will prepare the Local Nature Recovery Network. It is not clear at present what role the

		Council will play in producing it so preparation of the strategy is presently, and may remain, outside the Council's control.
Left blank	<b>Hallam Land Management</b>	Left blank
Policy para 12	<p>The policy conflicts with the Environment Act minimum requirement of 10% biodiversity net gain and is unsound. The Council recognise that they are departing from this national requirement but consider their position justified. This is not agreed, and it is not considered that the Council's conflict with the Environment Act is acceptable.</p> <p>The Natural Environment Topic Paper and specifically paragraph 3.46 highlights the importance of ensuring alignment with the national approach to biodiversity net gain by removing exemptions that were proposed. Similarly, the most recent consultation on the Biodiversity Net Gain Regulations and Implementation states, at page 7, that <i>"mandating biodiversity net gain through the Environment Act will establish a consistent set of requirements and necessary exemptions which give developers clarity as to how they can meet their net gain obligations."</i></p>	<p>The Council does not agree that there is a conflict with the national approach or the Environment Act. The Environment Act places a mandatory requirement for a minimum 10% BNG and does not set a maximum.</p> <p>There is no indication that Local Planning Authorities are expected to avoid exceeding the national 10% minimum requirement. Parliament has chosen not to place a cap on the amount of gain that could be sought when drafting the Act and we are not aware that government proposed one. The NPPF instructs LPAs to draft planning policies that seek gains in biodiversity but does not to place a cap on those gains. It is notable that the NPPF has been revised since the Environment Bill was first drafted and the government therefore had an opportunity to place a cap in it but did not do so. In the Consultation on Biodiversity Net Gain Regulations and Implementation that ran from 11 Jan to 5 April, Defra states "It remains the UK Government's intention to continue to allow higher percentage targets to be set by planning authorities at a local or site level. Any higher target should be made clear at an early stage in the planning or development process and careful consideration should be given to the feasibility and achievability of any requirements above 10%, which can have significant impacts on the costs of developing a site." (page 54, paragraph 2). The development of the local plan has followed this advice.</p>

<p>Policy para 12</p>	<p>Should the Council continue to seek 20% then there will be instances where planning permission is refused on the grounds of this policy, despite according with national legislation. In effect, there would be Development Plan policy which attracts the weight of Section 38(6) of the Act constantly at odds with another Statute.</p>	<p>As above, it is not agreed that there is a conflict with the Environment Act.</p> <p>The local Development Plan, which includes the Local Plan, is the starting point for planning decisions. It is not uncommon for permission to be refused even though schemes comply with legislation, and this is how England's planning system is intended to operate so does not constitute a reason to remove the policy.</p>
<p>Policy para 12</p>	<p>Using a higher percentage will increase costs put on developers and could run the risk of a series of unviable schemes. It should also be recognised that biodiversity net gain calculation is site specific and that until the scheme is prepared the requirement for 20% across all sites is not known to be achievable. Unless additional viability evidence and testing is prepared for this consultation on a range of sites then it is unreasonable to require all sites across the Borough to achieve 20%. This uncertainty is reflected in the national 10% minimum with the encouragement to seek higher levels where possible.</p> <p>The Council have published evidence of a viability assessment. However, there is concern regarding the assumption that 75% of the net gain will be delivered on site with the remaining 25% delivered off site. This relates to two key matters:</p> <ul style="list-style-type: none"> <li>• the first being the quantum of land required on site to deliver the net gain, which would reduce developable area in turn reducing the number of houses delivered on site; and</li> <li>• secondly, the ability for developers to also seek out 25% off site net gain which is both costly and there is no clear indication of where this off-site land would be found.</li> </ul>	<p>A range and mix of solutions (habitat creation, restoration, enhancement and offsite measures) will be available to secure the proposed biodiversity net gain. The viability assessment assumes across the typologies tested that a 15 – 30% additional land area / buffer over the net developable areas may be required. It is expected that the provision of undeveloped land on-site will serve multiple purposes including providing opportunities for BNG with offsite measures making up any residual shortfall.</p> <p>It is agreed that the implications will be scheme and site-specific. Reflecting this and the range of scenarios likely to be seen, it is unlikely to be appropriate to carry a worst-case scenario on this assumption throughout such an assessment. While it is acknowledged that the likely variables costs could be higher than assumed in some instances, these are considered likely to vary to an extent that lies within the normal variables and tolerances involved in making such an overview – considering viability at the strategic level. Although the potential variance appears high, this is variance to relatively small figures within the overall development context.</p>

	<p>The above demonstrates that although the Council have set out the contribution requirements and evidence in regards to net gain, there is conflict with paragraph 34 of the NPPF whereby the loss of developable land to meet the 20% net gain and the costly off site delivery potentially threatens the viability of all future schemes across the Borough. This threat to viability could undermine the deliverability of the plan and the ability for the Council to deliver the quantum of housing set out at Policy S2 of the adopted Local Plan Strategy and Sites document.</p>	<p>Indeed, there are many variables involved in the workings of the market on values and works costs over time, as well as other aspects that will move.</p> <p>From a costs point of view, there is considered to be capacity to bear some movements. As noted in other responses, these points are considered particularly relevant in the Guildford Borough context, where not only is there an opportunity for BNG solutions more readily taken off-site and likely at lower cost than Government assumptions.</p> <p>The Council is in discussion with landowners who wish to set up offsite habitat banks that can provide biodiversity credits (one of which already has a client for its credits) and is also exploring projects on land it controls. The borough is home to a large amount of SANG land and other land that is not in active economic use and which would be compatible with BNG.</p>
<p>Policy para 12</p>	<p>Specifically, and in regard to the strategic sites allocated within the adopted Local Plan Strategy and Sites document, there is concern that there is conflict between this proposed policy and Policy ID4. Policy ID4 states at “<i>new development should aim to deliver gains in biodiversity where appropriate.</i>” Should the proposed P6/P7 policy be adopted then strategy sites would have two different approaches to net gain. One which <i>aims</i> to deliver gains, and one which <i>requires a minimum of 20%</i>. Similarly, the Strategic Development Framework Supplementary Planning Document requires at paragraph 3.2.32 that “<i>proposals will be expected to...provide net gains.</i>” The strategy sites would also be required to accord with national legislation through the Environment Act and would be required to deliver 10% net gain.</p>	<p>Policy ID4 sets a general requirement to aim for net gain where appropriate. It is not agreed that there is a conflict with this because a development can aim to deliver a BNG whilst also achieving a 20% BNG. The new policy supplements ID4 by clarifying what sorts of measures are appropriate, setting a net gain standard for specific development types and setting a framework for how the gains should be achieved.</p> <p>The above notwithstanding, if there is considered to be a conflict, the Planning and Compulsory Purchase Act 2004 includes measures to resolve conflict between Development Plan Documents (DPD) where it states that the conflict is resolved in the favour of the most recently adopted. This provision is included because conflict between DPDs is not unlikely given that they are</p>

		<p>reviewed or produced at different times and in different circumstances. If the inspector wishes the conflict to be resolved, conflicting elements of policy ID4 can be superseded for clarity.</p> <p>There is no conflict with the Environment Act as this requires a 10% minimum BNG and the Act places no cap on gains in Local Plan policies.</p>
Policy para 12	Should the Council wish to seek higher percentages, this should be encouraged, not required.	This would not reflect the urgency of the need for biodiversity recovery, as set out in the Natural Environment Topic Paper. The urgency is such that achieving the specified net gain should be a requirement such that non compliance could result in a reason for refusal. Merely encouraging a 20% net gain would likely result in avoidance of the standard as it would not constitute a reason for refusal.
Left blank	<b>Thames Water</b>	Left blank
Policy para 12	<p>Thames Water are supportive of the principle of biodiversity net gain (BNG) will be complying with the requirements of the Environment Act 2021 for a minimum of 10% BNG as part of Guildford Sewage Treatment Works relocation development proposals.</p> <p>Emerging Policy P6/P7 Biodiversity in New Developments, sets out a requirement for 20% BNG. Thames Water considers the policy to be unsound as there is insufficient evidence or justification for such a requirement that is twice that required by the Environment Act 2021 and thus not consistent with national policy and will not be effective in delivering development over the plan period.</p>	<p>The Council does not agree that there is a conflict with the national approach or the Environment Act. The Environment Act places a mandatory requirement for a minimum 10% BNG and does not set a maximum.</p> <p>There is no indication that Local Planning Authorities are expected to avoid exceeding the national 10% minimum requirement. Parliament has chosen not to place a cap on the amount of gain that could be sought when drafting the Act and we are not aware that government proposed one. The NPPF instructs LPAs to draft planning policies that seek gains in biodiversity but does not to place a cap on those gains. It is notable that the NPPF has been revised since the Environment Bill was first drafted and the government therefore had an opportunity to place a</p>



		<p>cap in it but did not do so. In the Consultation on Biodiversity Net Gain Regulations and Implementation that ran from 11 Jan to 5 April, Defra states “It remains the UK Government’s intention to continue to allow higher percentage targets to be set by planning authorities at a local or site level. Any higher target should be made clear at an early stage in the planning or development process and careful consideration should be given to the feasibility and achievability of any requirements above 10%, which can have significant impacts on the costs of developing a site.” (page 54, paragraph 2). The development of the local plan has followed this advice.</p> <p>A detailed justification for implementing a local BNG standard that is higher than the national minimum standard is set out in the Natural Environment Topic and in the introduction and supporting text for the policy: Surrey has suffered comparatively worse declines in biodiversity than nationally, it is imperative that this is reversed, a higher level of BNG brings greater confidence in the achievement of this objective and in doing so brings the plan into alignment with national policy.</p>
<p>Policy para 12</p>	<p>No evidence or assessment is presented as part of the Regulation 19 Consultation that the cost of increasing BNG from 10% to 20% is justified in the local circumstances and that it is not prohibitive for development proposals in the Borough and, importantly for Thames Water, not prohibitive in respect of often constrained infrastructure development proposals that Thames Water brings forward. The available evidence published by Defra (Biodiversity net gain and local nature recovery strategies - Impact Assessment, Defra, 15/10/2019 - <a href="https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements">https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements</a> last visited</p>	<p>Although acknowledged as not at the higher end of potential costs, which are not appropriate to apply to all scenarios, costs assumptions have been made. The viability assessment assesses the potential impact of increasing the minimum BNG from 10% to 20% and does not consider the policy to result in unacceptable impacts. This is necessarily also an assumption but is made in addition to the land areas added assumed in relation to open space (Appendix I of the Viability Assessment (doc. ref.?) notes this).</p>

	<p>9/2/2022) concludes that 10% BNG is the right level when considering the trade-off between the cost implications for developers and the likelihood of net gain being delivered. Section 6.11.2 states: 'When analysing the impact of changing the level of net gain required, we show that doubling (to 20%)... the net gain percentage increases costs to developers by 19%...'. Thames Water consider that Policy P6/P7 should be amended to be consistent with national policy, requiring 10% BNG, and be effective and justified.</p>	<p>In pure cost terms, the expected 19% increase on costs that results from increasing BNG from 10% to 20% is not significant.</p> <p>10% is the mandatory minimum net gain set out in the Environment Act. Capping gains at 10% does not appear to be national policy as the government has confirmed that LPAs can bring in higher standards, and it has not placed the 10% standard in revisions to the NPPF.</p> <p>10% is the mandatory minimum net gain set out in the Environment Act. It does not appear to be national policy, as the government has confirmed that LPAs can bring in higher standards, and it has not placed the 10% standard in revisions to the NPPF.</p>
Left blank	<b>Guildford Greenbelt Group</b>	Left blank
Monitoring indicators	<p>Set at 25 houses or greater, but this should be 10 and above as this is the standard GBC definition of major development.</p> <p>The policy needs some measure of control when a number of windfall developments come forward in the same locality/village whereby there are 4/5 houses to be built. If there is no control collectively, as is the case in West Horsley and Send, developers are going under the radar for providing any mitigation for the loss of biodiversity.</p>	<p>The policy applies to all developments, not only those of 25 homes or greater. Each development will need to achieve net gains on its own merit. The monitoring indicator is set at 25 homes as this will capture the majority of the housing supply.</p>
Left blank	<b>Royal Society for the Protection of Birds</b>	Left blank
Policy para 8	<p>GBC could provide more certainty to the incorporation of measures on building structures through mandatory planning conditions. Such conditions have been included within Local and City Plans around England. For example, in Brighton and Hove City Council have recently (2020) included a 'Guidance</p>	<p>The policy requires measures on building structures which would include swift bricks, bee bricks, bat boxes etc (see 4.35). The Council intends to produce a Green Infrastructure SPD which will provide guidance to ensure the right measures are used in the right places.</p>

	<p>note for provision of swift boxes (including swift bricks) in new development' document to provide householders and developers with advice on the requirement for swift brick/box provision under certain development criteria. This guidance document supports requirements outlined within Brighton and Hove City Council's City Plan Part 2 Submission document (DM37 para 2.281, p.114-115). Similar examples of nesting requirements can be found in Oxford, Cornwall, and Exeter.</p>	
Left blank	<b>Portland Capital</b>	Left blank
Policy para 1	<p>Policy P6/P7 wording should be updated to allow additional flexibility relative to the requirement to seek maximum biodiversity gain and the provision of biodiversity features (planting schemes/landscaping, measures on building structures and site design) where this may compromise wider residential delivery.</p> <p>Such a requirement should be reviewed on a site-by-site basis. This is reflective of the consideration of viability identified within the NPPF and identifying land for homes.</p> <p>At Paragraph 68 it states: "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, taking into account their availability, suitability and likely economic viability."</p> <p>Policy 124 of the NPPF 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 plan is read as a whole and developments will be required to seek maximum biodiversity gain whilst complying with other policies covering matters such as design, character, conservation and housing delivery etc. The application of the requirement will be considered on a site-by-site basis and a reasonable reading of the policy would not include the view that all other matters are secondary to biodiversity.</p>

Left blank	<b>Home Builders Federation</b>	Left blank
Policy para 12	<p>The policy is unsound as it is inconsistent with national policy and unjustified</p> <p>The Council recognises in paragraph 3.46 of the Natural Environment Topic Paper the importance of ensuring alignment with the national approach to biodiversity net gain by removing exemptions that were proposed. The HBF would agree with the importance of aligning national and local policy. However, the Councils desire to align with national policy is not taken forward with regard to the 10% net gain requirements now set out in the Environment Act. The Council recognise that the policy is not consistent with legislation but consider their position is both justified. The HBF disagrees with the Council and do not consider the Council's departure from the 10% requirement in the Environment Act to be justified.</p> <p>...</p> <p>The latest consultation also reiterates the Government's view that whilst the 10% requirement is not a cap going beyond that figure should be the choice of developer to "voluntarily go further". Therefore, whilst the NPPF and PPG do not specifically prohibit setting standards over and above those in the Environment Act it is clear that the intention of the Government is to a set minimum requirement but encourage where possible the developers to go further. Such an approach also recognises that until an assessment of the biodiversity on a site is undertaken it is very difficult to assess what is required to deliver the minimum level of net gain either on- or off-site. Some sites may be able to deliver significant improvements more easily without a significant reduction in the developable area, whilst other sites may well have their capacity significantly reduced in order to achieve</p>	<p>The Council does not agree that there is a conflict with the national approach or the Environment Act. The Environment Act places a mandatory requirement for a minimum 10% BNG and does not set a maximum.</p> <p>There is no indication that Local Planning Authorities are expected to avoid exceeding the national 10% minimum requirement. Parliament has chosen not to place a cap on the amount of gain that could be sought when drafting the Act and we are not aware that government proposed one. The NPPF instructs LPAs to draft planning policies that seek gains in biodiversity but does not to place a cap on those gains. It is notable that the NPPF has been revised since the Environment Bill was first drafted and the government therefore had an opportunity to place a cap in it but did not do so. In the Consultation on Biodiversity Net Gain Regulations and Implementation that ran from 11 Jan to 5 April, Defra states "It remains the UK Government's intention to continue to allow higher percentage targets to be set by planning authorities at a local or site level. Any higher target should be made clear at an early stage in the planning or development process and careful consideration should be given to the feasibility and achievability of any requirements above 10%, which can have significant impacts on the costs of developing a site." (page 54, paragraph 2). The development of the local plan has followed this advice.</p> <p>A detailed justification for implementing a local BNG standard that is higher than the national minimum standard is set out in the Natural Environment Topic and in the introduction and supporting text for the policy: Surrey has suffered comparatively worse declines in</p>

	<p>the minimum requirements set by Government. This uncertainty is clearly why the Government set its expectation at 10% recognising that it was a balance between delivering net gains and increasing the supply of new homes. However, we recognise that offsite delivery and offsetting are both options that would maintain the developable area of a site. However, as set out below this has not been tested by the Council in relation to their policy.</p>	<p>biodiversity than nationally, it is imperative that this is reversed, a higher level of BNG brings greater confidence in the achievement of this objective and in doing so brings the plan into alignment with ational policy.</p>
<p>Policy para 12</p>	<p>The Council note that other areas are examining the possibility of delivering beyond the 10% net gain requirement set out in the Environment Act. Whilst this may be the case it does not justify the Council's position. Whilst other authorities may be considering their position the examples given have not gone through an examination in public or are supplement planning documents which, as the Council should be aware, face no examination in public and do not contain policies. In contrast the most recent consultation on Biodiversity Net Gain Regulations and Implementation sets out on page 7 the Government reiterates their intention that "Mandating biodiversity net gain through the Environment Act will establish a consistent set of requirements and necessary exemptions which give developers clarity as to how they can meet their net gain obligations." By setting out a minimum requirement the Government recognises the importance to all parties of consistency in such matters and the Council's decision to require a 20% net gain in biodiversity is clearly not consistent with national policy.</p>	<p>This point is noted. The list is intended to demonstrate that many other authorities have come to the same conclusions over the appropriate level of BNG and that in their own context 20% is more appropriate than 10%.</p> <p>The Natural Environment Topic Paper sets out a justification for seeking a local BNG standard higher than the national standard.</p>
<p>Policy para 12</p>	<p>The Council have considered the impact of a 20% BNG on viability. The costs of implementing the 20% BNG is based on the evidence set out in the DEFRA/ Natural England impact assessment undertaken as part of the development of the 10% requirement as set out in the Environment Act. The uplift</p>	<p>The marketing study (see <a href="#">Defra, UK - Science Search</a>) identified an upper cost estimate (£25k per biodiversity unit) for districts at risk of scarcity, primarily urban districts. In our borough, the upper estimate of £20k would apply. This could place costs at up to</p>

	<p>used with regard to the percentage increase on build costs is based on the central estimate within tables 19 and 20. As such the Council are assuming that 75% of all net gain is delivered onsite with the remaining 25% delivered through offsite mitigation or offsetting. In making such an assumption it is therefore important to consider the amount of additional land that would be required to deliver the majority of the 20% BNG on site and the consequential impact on the amount of land available for development. There could be a significant impact on the net developable area of some sites with a consequential impact on the number of homes that a site can deliver. This will have both an impact on the viability of a site and, potentially, on the overall deliverability of the plan if sites deliver fewer homes than were expected at the examination of the part 1 local plan.</p> <p>If the expectation is that the additional 10% BNG above the statutory minimum that is being required in this policy is to be delivered offsite than there will be a significantly higher cost than is set out in the viability study. The Government's Impact Assessment provides some indication as to the cost of delivering BNG offsite. Table 19 of the Impact Assessment shows that scenario C, which modelled all of the mandatory 10% being delivered off site would equate to 2.4% of build costs on a greenfield site compared to 0.7% under scenario B which is the basis of the Council's estimates.</p> <p>However, these costs may be an underestimate. The evidence from the Government's market analysis supporting the current consultation on the implementation of Biodiversity Net Gain indicates that the average price of delivering net gain offsite is higher than when set out in the impact assessment. The Impact Assessment used a price of £11,000 per biodiversity unit, but stakeholders informing the study considered that this price was too low to attract sufficient supply to meet expected demand. A range of between</p>	<p>approximately twice the very small allowance made, but bearing in mind the relativities within the overall development values and costs picture, as well as the likelihood that worst-case costs will not be consistently involved, the additional cost is not considered to have unacceptable impacts on viability.</p> <p>The viability assessment assumes across the typologies tested that a 15 – 30% additional land area / buffer over the net developable areas may be required in addition to Open Space, which provides flexibility in the amount of BNG that can be provided onsite.</p> <p>The study notes "Many caveats and assumptions have been necessary to develop the market modelling" and that as a result confidence in the results is moderate. It assumes that "In general, farmers expect, and are expected by other stakeholders, to be more likely to supply [biodiversity units] through creation actions, although, in some cases, this will require land use change". The study notes that the requirement to lock land away for conservation would reduce interest from some landowners such as farmers, and so would the lack of clarity on stacking with other land management functions, such as SANG.</p> <p>Our borough is markedly different to other districts in England due to the existence of SANGs that provide large areas of land already locked away in perpetuity and already in active management for a purpose largely compatible with biodiversity works. The potential to stack BNG works on SANG land is addressed through the 2021 Natural England SANG guidelines and in the supporting text of the policy at 4.48.</p> <p>As a result of SANGs, the cost of providing offsite biodiversity units is likely to be significantly lower than in</p>
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	<p>£15,000 and £25,000 per biodiversity unit was considered to be more reasonable to attract sufficient providers to deliver the necessary units to meet demand.</p>	<p>other parts of the country as doing so is far more attractive for SANG owners than for other landowners.</p> <p>This is demonstrated by the Council, which is developing BNG proposals for its own SANGs, and the Land Trust, which manages the majority of privately owned SANGs, which is also developing BNG proposals for its SANGs. Additionally, BNG providers are already interested in providing dedicated habitat banks outside SANGs and have met with the Council to discuss pilot projects.</p>
Policy para 12	<p>The HBF would recommend that the Council remove the requirement for all qualifying development to deliver a 20% net gain in biodiversity and replaced with a policy that state the Council strongly supports development that go beyond the minimum requirements and deliver a biodiversity net gain of 20%. Such an approach would be consistent with national policy and the Government's objectives for both net gain and housing delivery. It will also ensure that the approach taken by the Council is sufficiently flexible to allow schemes to deliver the requirements set out in legislation whilst meeting the Council's other policies.</p>	Left blank
Left blank	<b>Martin Grant Homes</b>	Left blank
Left blank	<p>There is a risk that Policy P6/P7 as drafted will have unintended consequences and limit the deliverability of much needed development in the Borough.</p>	Left blank
Policy para 1	<p>Part 1) advises development proposals are 'required to seek maximum biodiversity gain'; this could be interpreted as meaning biodiversity is to be prioritised above all else, potentially inhibiting the delivery of homes allocated on sites for such development. As such, the policy should be</p>	<p>We do not agree with this interpretation and think with the definition at 4.16 that the policy is clear.</p>

	<p>amended to encourage maximum biodiversity gain within the context of what is feasible and appropriate on a given site should be provided. This would be consistent with the supporting text provided at paragraphs 4.16-4.18. Therefore, the recommended amendment is as follows: “Development proposals, including those exempt from minimum biodiversity net gain standards, are required to follow the mitigation hierarchy and provide for the maximum feasible biodiversity gain.”</p>	
Policy para 6	<p>Part 6) sets out that tree canopies are expected to be retained. Whilst tree retention is supported in principle, there may be circumstances where the removal of some trees is necessary, for example to enable access to a site or where trees are dying and potentially dangerous. To this end, Policy P6/7 should seek retention of tree canopies where possible.</p>	<p>The use of the word “expect” rather than “require” acknowledges that there may be circumstances where removal is necessary.</p>
Policy para 8	<p>It will be important that features on/in building structures are appropriate to the context, as paragraph 4.36 of the supporting text notes. Appropriate features are likely to differ on a site by site basis and should therefore be informed by ecology surveys to establish which species are present on a site and what the site could feasibly offer.</p>	<p>This is agreed. The intention is to set out guidance on appropriateness through a future SPD, and it is acknowledged that where an ecology survey is produced that this could also be a useful tool.</p>
Policy para 9	<p>Part 9) states that development sites and built features are expected to be permeable for wildlife. It is recommended that this is amended to remove reference to built features as the focus of the policy should be on sites as a whole rather than individual buildings, which it is not reasonable or appropriate to expect to be permeable for wildlife.</p>	<p>The reference to built features refers to walls, fences and other barriers as set out at 4.39.</p>



<p>Policy para 11</p>	<p>Amendments are sought to Part 11) relating to promoting ‘a sense of community ownership of green spaces and habitats’. The principle of this is understood, however measures to promote a sense of community ownership are not defined and the policy is therefore unlikely to be effective. Moreover, it may not always be appropriate for all green spaces/habitats to be perceived as community owned, for example where they are being protected so as to protect a particular species. As such, we recommend that Part 11) is amended to encourage, rather than require, the provision of measures to promote a sense of community ownership of green spaces and habitats, where appropriate. Recommended wording is provided: “Development proposals are encouraged, to deliver measures that promote a sense of community ownership of green spaces and habitats where appropriate.”</p>	<p>The word “expect” is used, which indicates that there may be circumstances where this is not appropriate.</p> <p>The point about defining the measures is noted, but we think it should be left to the applicant to propose appropriate measures. There are some examples provided in 4.43.</p>
<p>Policy para 12</p>	<p>The Environmental Bill, which seeks a 10% biodiversity net gain on all new developments, was enacted in 2021. Although yet to become a mandatory requirement, until such time as secondary legislation is introduced, any new policies should therefore be mindful of and consistent with this requirement. As such, we consider that Policy P6/7 should require only 10% net gain, to be in line with national policy.</p> <p>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. No evidence is provided to validate the comment in paragraph 4.44 that ‘Surrey has suffered a severe biodiversity decline which is significantly worse than the country as a whole’ nor to demonstrate why imposing a higher requirement than envisaged in the Environment Act ‘provides greater certainty that a genuine net gain will be achieved’ as paragraph 4.44 alleges. The policy as drafted is</p>	<p>The Council does not agree that there is a conflict with the national approach or the Environment Act. The Environment Act places a mandatory requirement for a minimum 10% BNG and does not set a maximum.</p> <p>There is no indication that Local Planning Authorities are expected to avoid exceeding the national 10% minimum requirement. Parliament has chosen not to place a cap on the amount of gain that could be sought when drafting the Act and we are not aware that government proposed one. The NPPF instructs LPAs to draft planning policies that seek gains in biodiversity but does not to place a cap on those gains. It is notable that the NPPF has been revised since the Environment Bill was first drafted and the government therefore had an opportunity to place a cap in it but did not do so. In the Consultation on Biodiversity Net Gain Regulations and Implementation that ran from 11 Jan to 5 April, Defra states “It remains</p>

	<p>therefore not justified and not sound. It should instead require a 10% net gain, in accordance with incoming national requirements, unless any alternative nationally prescribed standard is created.</p>	<p>the UK Government’s intention to continue to allow higher percentage targets to be set by planning authorities at a local or site level. Any higher target should be made clear at an early stage in the planning or development process and careful consideration should be given to the feasibility and achievability of any requirements above 10%, which can have significant impacts on the costs of developing a site.” (page 54, paragraph 2). The development of the local plan has followed this advice.</p> <p>A detailed justification for implementing a local BNG standard that is higher than the national minimum standard is set out in the Natural Environment Topic and in the introduction and supporting text for the policy: Surrey has suffered comparatively worse declines in biodiversity than nationally, it is imperative that this is reversed, a higher level of BNG brings greater confidence in the achievement of this objective and in doing so brings the plan into alignment with national policy.</p> <p>Surrey’s position is sufficiently unique, as set out in the Natural Environment Topic Paper, to justify a stronger local standard. The Surrey Nature Partnership supports the evidence and recommends the 20% standard as the appropriate standard for Surrey authorities. The Council considers the Topic Paper evidence to be appropriate and robust.</p>
<p>Policy para 14</p>	<p>We agree that as set out in Part 14) biodiversity gains that provide the best biodiversity value should be sought. These should be identified based on what is appropriate and feasible for a given site as well as taking into account wider priorities across the Borough.</p>	<p>This point is agreed. The policy and supporting text do not mandate biodiversity measures but instead set out the considerations which allows applicants to establish the most appropriate, feasible works.</p>
<p>Left blank</p>	<p><b>Blackwell Farm Ltd &amp; University of Surrey</b></p>	<p>Left blank</p>

<p>Policy para 12</p>	<p>It is clear that the government has heard pleas for higher and lower targets through consultation but have concluded that 10% strikes the right balance and has legislation lined up at this level. Our clients are not persuaded that a minimum 20% level, as required in draft policy P6/P7, is necessary, given that the mandatory minimum is set at 10% by the government.</p>	<p>The Council does not agree that there is a conflict with the national approach or the Environment Act. The Environment Act places a mandatory requirement for a minimum 10% BNG and does not set a maximum.</p> <p>There is no indication that Local Planning Authorities are expected to avoid exceeding the national 10% minimum requirement. Parliament has chosen not to place a cap on the amount of gain that could be sought when drafting the Act and we are not aware that government proposed one. The NPPF instructs LPAs to draft planning policies that seek gains in biodiversity but does not to place a cap on those gains. It is notable that the NPPF has been revised since the Environment Bill was first drafted and the government therefore had an opportunity to place a cap in it but did not do so. In the Consultation on Biodiversity Net Gain Regulations and Implementation that ran from 11 Jan to 5 April, Defra states “It remains the UK Government’s intention to continue to allow higher percentage targets to be set by planning authorities at a local or site level. Any higher target should be made clear at an early stage in the planning or development process and careful consideration should be given to the feasibility and achievability of any requirements above 10%, which can have significant impacts on the costs of developing a site.” (page 54, paragraph 2). The development of the local plan has followed this advice.</p> <p>A detailed justification for implementing a local BNG standard that is higher than the national minimum standard is set out in the Natural Environment Topic and in the introduction and supporting text for the policy: Surrey has suffered comparatively worse declines in biodiversity than nationally, it is imperative that this is reversed, a higher level of BNG brings greater confidence</p>
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		in the achievement of this objective and in doing so brings the plan into alignment with national policy.
Policy para 12	<p>It is possible that a minimum of 20% could have unwelcome impacts on development viability. Many allocated development sites have a range of obligations they are expected to meet and contributions to provide and having a BNG set at a minimum of 20% rather than 10% could add costs, perhaps to the extent that other requirements or contributions may have to be reduced.</p> <p>Our client notes that the impact of the BNG policy has been considered in the Guildford Borough Council – LPDMP &amp; Stage 1 CIL Viability Assessment – Final Report (Dec 2021). However, our client remains concerned that the results of this assessment can only provide a high-level assessment of the potential viability of the strategic sites. In reality, the impact of a minimum 20% BNG requirement could be to affect viability unfavourably and could therefore affect the provision of other requirements and contributions.</p>	<p>In pure cost terms, the expected 19% increase on costs that results from increasing BNG from 10% to 20% is not significant and is not expected to have unacceptable impacts on viability.</p> <p>It is agreed that the implications will be scheme and site-specific. Reflecting this and the range of scenarios likely to be seen. While it is acknowledged that the likely variables costs could be higher than assumed in some instances, these are considered likely to vary to an extent that lies within the normal variables and tolerances involved in making such an overview – considering viability at the strategic level. Although the potential variance appears high, this is variance to relatively small figures within the overall development context. From a costs point of view, there is considered to be capacity to bear some movements.</p>
Left blank	<b>Burpham Neighbourhood Foru</b>	Left blank
Left blank	We are concerned that this policy will be superseded by the requirements of the new Environment Act 2021, particularly in relation to net Gain requirements.	The policy is aligned with the Environment Act 2021.
Left blank	<b>St Edward Homes Ltd</b>	Left blank
Policy para 12	<p>Object / unjustified and not consistent with national guidance.</p> <p>Object to this policy as presently worded as it is not justified or consistent with national policy as per paragraph 35 of the</p>	Qualifying development is defined at 4.13.

	<p>NPPF, however they support the overall objectives of this policy.</p> <p>Policy stipulates that “12) Qualifying development proposals are required to achieve a biodiversity net gain of at least 20 per cent”. Firstly, “qualifying development” is not defined in the policy or support text.</p>	
<p>Policy para 12</p>	<p>The draft policy requires at least 20% BNG to be achieved for qualifying development. This is double the minimum requirement of the Environment Act 2021, which is 10%. Whilst the minimum requirement in the Act may change over time, there is no detailed justification in the DMP for GBC to require at least 20% BNG on qualifying development now / on its adoption.</p> <p>GBC’s proposal to double to minimum requirement to 20% independent of the novel national initiative could undermine the delivery of development sites, and therefore BNG.</p> <p>No evidence has been provided to demonstrate that the Borough is in need of enhanced biodiversity gains on the scale proposed, and so the policy should be tied to the requirements of the Environment Act, or other national standard that maybe applied in the future. This would help developers plan strategically and provide certainty, which in turn facilitates the fast delivery of new homes and regeneration.</p> <p>St Edward suggest that the policy standard is amended to 10%.</p>	<p>The Council does not agree that there is a conflict with the national approach or the Environment Act. The Environment Act places a mandatory requirement for a minimum 10% BNG and does not set a maximum.</p> <p>There is no indication that Local Planning Authorities are expected to avoid exceeding the national 10% minimum requirement. Parliament has chosen not to place a cap on the amount of gain that could be sought when drafting the Act and we are not aware that government proposed one. The NPPF instructs LPAs to draft planning policies that seek gains in biodiversity but does not to place a cap on those gains. It is notable that the NPPF has been revised since the Environment Bill was first drafted and the government therefore had an opportunity to place a cap in it but did not do so. In the Consultation on Biodiversity Net Gain Regulations and Implementation that ran from 11 Jan to 5 April, Defra states “It remains the UK Government’s intention to continue to allow higher percentage targets to be set by planning authorities at a local or site level. Any higher target should be made clear at an early stage in the planning or development process and careful consideration should be given to the feasibility and achievability of any requirements above 10%, which can have significant impacts on the costs of developing a site.” (page 54, paragraph 2). The development of the local plan has followed this advice.</p>

		<p>A detailed justification for implementing a local BNG standard that is higher than the national minimum standard is set out in the Natural Environment Topic and in the introduction and supporting text for the policy: Surrey has suffered comparatively worse declines in biodiversity than nationally, it is imperative that this is reversed, a higher level of BNG brings greater confidence in the achievement of this objective and in doing so brings the plan into alignment with national policy.</p> <p>The viability assessment assumes across the typologies tested that a 15 – 30% additional land area / buffer over the net developable areas may be required in addition to Open Space, which provides flexibility in the amount of BNG that can be provided onsite.</p> <p>In pure cost terms, the expected 19% increase on costs that results from increasing BNG from 10% to 20% is not significant and is not expected to have unacceptable impacts on viability.</p>
Left blank	<p>How the BNG in the Environment Act is to be implemented and secured is still under review. At the time of writing there is a transition period to 2023 until the minimum BNG of 10% is required for every relevant development. This transition period allows mechanisms and procedures to be created to enable BNG to be quantified and secured, and also ensures the development industry has the time to adapt and plan their sites and interests accordingly.</p>	<p>While nationally the 10% BNG standard will be introduced in 2023, this does not indicate a problem with the introduction of a local standard ahead of this date. A small number of Local Authorities have already introduced BNG standards, which indicates that it is possible to implement BNG ahead of the national implementation date.</p> <p>The Council is in discussion with landowners who wish to set up offsite habitat banks that can provide biodiversity credits (one of which already has a client for its credits) and is also exploring projects on land it controls. The borough is home to a large amount of SANG land and other land that is not in active economic use and which would be compatible with BNG. As a result, there will be</p>

		<p>a supply of offsite credits that will make the standard achievable.</p> <p>The Biodiversity Metric 3.0 is already available to developers and consenting bodies. The metric 3.0 is still subject to revision but is ready to be used. It is an improvement on the metric 2.0, which is already used in real world developments.</p> <p>The approach to BNG is centred around the mitigation hierarchy. The hierarchy has been a key principle in the development industry for some time and the Council's view is that this does not represent a radical change in development practice.</p> <p>The policy was first proposed in the Issues and Options document that was consulted upon in June and July 2020. The following policy development process took several years and provided advanced notice of the incoming policy regime which has allowed development proposals time to adapt.</p>
Left blank	<b>Bloor Homes</b>	Left blank
Policy para 12	<p>Object. The policy is not justified or consistent with national policy as per paragraph 35 of the NPPF, however they support the overall objectives of this policy. Bloor Homes suggest that the policy standard is amended to 10%.</p> <p>The draft policy requires at least 20% BNG to be achieved for qualifying development. This is double the minimum requirement of the Environment Act 2021, which has a minimum requirement of 10%. Whilst the minimum requirement in the Act may change over time, there is no detailed justification in the DMP for GBC to require at least 20% BNG on qualifying development now / on its adoption.</p>	<p>A detailed justification for implementing a local BNG standard that is higher than the national minimum standard is set out in the Natural Environment Topic and in the introduction and supporting text for the policy: Surrey has suffered comparatively worse declines in biodiversity than nationally, it is imperative that this is reversed, a higher level of BNG brings greater confidence in the achievement of this objective and in doing so brings the plan into alignment with national policy.</p>

	<p>Unless evidence is provided to demonstrate that the Borough is in need of enhanced biodiversity gains on the scale proposed, then the policy should be tied to the requirements of the Environment Act, or other national standard that maybe applied in the future. This would help developers plan strategically and provide certainty, which in turn facilitates the fast delivery of new homes.</p>	
<p>Policy para 12</p>	<p>GBC's proposal to double to minimum requirement to 20% independent of the novel national initiative could undermine the delivery of development sites, and therefore BNG.</p>	<p>The viability assessment assumes across the typologies tested that a 15 – 30% additional land area / buffer over the net developable areas may be required in addition to Open Space, which provides flexibility in the amount of BNG that can be provided onsite.</p> <p>In pure cost terms, the expected 19% increase on costs that results from increasing BNG from 10% to 20% is not significant and is not expected to have unacceptable impacts on viability.</p>
<p>Left blank</p>	<p>How the BNG in the Environment Act is to be implemented and secure is still under review. At the time of writing there is a transition period to 2023 until the minimum BNG of 10% is required for every relevant development proposal. This transition period allows mechanisms and procedures to be created to enable BNG to be quantified and secured, and also ensures the development industry has the time to adapt and plan their sites and interests accordingly.</p>	<p>While nationally the 10% BNG standard will be introduced in 2023, this does not indicate a problem with the introduction of a local standard ahead of this date. A small number of Local Authorities have already introduced BNG standards, which indicates that it is possible to implement BNG ahead of the national implementation date.</p> <p>The Council is in discussion with landowners who wish to set up offsite habitat banks that can provide biodiversity credits (one of which already has a client for its credits) and is also exploring projects on land it controls. The borough is home to a large amount of SANG land and other land that is not in active economic use and which would be compatible with BNG. As a result, there will be</p>



		<p>a supply of offsite credits that will make the standard achievable.</p> <p>The Biodiversity Metric 3.0 is already available to developers and consenting bodies. The metric 3.0 is still subject to revision but is ready to be used. It is an improvement on the metric 2.0, which is already used in real world developments.</p> <p>The approach to BNG is centred around the mitigation hierarchy. The hierarchy has been a key principle in the development industry for some time and the Council's view is that this does not represent a radical change in development practice.</p> <p>The policy was first proposed in the Issues and Options document that was consulted upon in June and July 2020. The following policy development process took several years and provided advanced notice of the incoming policy regime which has allowed development proposals time to adapt.</p>
Left blank	<b>Thakeham Homes</b>	Left blank
Policy para 6	Part 6 – Whilst the retention of tree canopies is supported, this part of the policy could be unduly restrictive and should allow losses where these are supported by arboricultural advice.	The policy uses “expect” with regards to retention of tree canopies which allows for losses where they can be justified.
Policy para 12	A consistent approach to delivering Biodiversity Net Gain (BNG) is required across the country and this view is supported by Government. The most recent Government consultation on Biodiversity Net Gain Regulations and Implementation provides a very clear steer on this by reiterating the expectation that “Mandating biodiversity net	<p>The Council does not agree that there is a conflict with the national approach or the Environment Act. The Environment Act places a mandatory requirement for a minimum 10% BNG and does not set a maximum.</p> <p>There is no indication that Local Planning Authorities are expected to avoid exceeding the national 10% minimum</p>

	<p>gain through the Environment Act will establish a consistent set of requirements and necessary exemptions which give developers clarity as to how they can meet their net gain obligations.” By setting out a minimum requirement, the Government recognises the importance to all parties of consistency in such matters and this Policy which requires a 20% net gain in biodiversity is clearly not consistent with this position. Therefore, we consider the draft policy should be amended so that it requires a minimum of 10% BNG, but encourages developers to exceed this target wherever possible.</p>	<p>requirement. Parliament has chosen not to place a cap on the amount of gain that could be sought when drafting the Act and we are not aware that government proposed one. The NPPF instructs LPAs to draft planning policies that seek gains in biodiversity but does not to place a cap on those gains. It is notable that the NPPF has been revised since the Environment Bill was first drafted and the government therefore had an opportunity to place a cap in it but did not do so. In the Consultation on Biodiversity Net Gain Regulations and Implementation that ran from 11 Jan to 5 April, Defra states “It remains the UK Government’s intention to continue to allow higher percentage targets to be set by planning authorities at a local or site level. Any higher target should be made clear at an early stage in the planning or development process and careful consideration should be given to the feasibility and achievability of any requirements above 10%, which can have significant impacts on the costs of developing a site.” (page 54, paragraph 2). The development of the local plan has followed this advice.</p>
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	<p>Object - TW support the overall objectives of this policy but seek a few changes. As presently worded, this policy is not justified or consistent with national policy as per paragraph 35 of the NPPF.</p>	Left blank
Policy para 2	<p>2) Development proposals within or adjacent to a Biodiversity Opportunity Area (BOA) are required (<b>where feasible</b>) to...</p> <p>TW remain of the view that the phrase ‘where feasible’ should be added to the wording of this policy because not every development will be able to achieve everything that is sought</p>	<p>We do not agree that the addition of “where feasible” is necessary as the planning process allows flexibility where the outcomes sought by policy are not feasible. Applicants would not be expected to support BOAs through measures on land outside their control, but can support BOAs through measures within the development</p>

	<p>within the policy wording, In particular 2b), the requirement to both protect and enhance habitats and species within an area of land that may be outside of their control. TW note GBC's response to the Regulation 18 consultation comments: "the planning process allows flexibility where the outcomes sought by policy are not possible." However for policies to be positively prepared they must be clear and realistically capable of being achieved. If the possibility that certain aspects of policies may not be achievable, recognising that policy wording in itself can be open to interpretation, then flexibility should be factored into the wording to ensure that developments are not unduly penalised for failure to achieve the impossible.</p> <p>If GBC insists that TW's suggested addition is not required, then clarification should be added to the supporting text to explain the following, as per GBC's response to the Regulation 18 consultation policy:</p> <p>"The protection and enhancement of habitats and species within a BOA can include the improvement of biodiversity habitats within adjacent land, which can serve to improve the condition and connectivity of habitats within the BOA and in turn the species supported, without the need to deliver habitat works within the BOA land itself."</p>	<p>site. This principle has already been established through policy ID4 of the LPSS,</p> <p>A minor modification has been proposed for the supporting text at 4.21 in order to clarify that the policy reference to sites adjacent to a BOA does not indicate a need to undertake offsite improvement works:</p> <p>...Where a development falls within <del>or adjacent to</del> a BOA, the scheme's biodiversity measures are required to be consistent with these statements. <u>For sites adjacent to a BOA, on-site works are required to support the priority habitats and species, aims, objectives and targets in the statements where feasible.</u></p>
Policy para 12	<p>A requirement of at least 20% BNG is greater than that required by the Environment Act, which states a requirement of 10%. Although GBC has explained in the revised supporting text that this figure has been selected to reflect the fact that Surrey has suffered worse biodiversity declines than the country as a whole, no evidence or reasoned justification</p>	<p>A full justification for the higher requirement is set out in paragraphs 3.47-3.55 of the Natural Environment Topic Paper. The 20% figure was chosen because the impact assessment<sup>2</sup> produced by the government in 2019 to support the draft Environment Bill tested two standards –</p>

<sup>2</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/839610/net-gain-ia.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf)

	is presented as to why a specific stated percentage that is double that stated in the Environment Bill has been arrived at.	10% and 20%. The topic paper sets out the reason for rejecting the 10% standard locally.
Policy para 12	TW objects to this policy on the basis that the specific elevated BNG requirement above the national standard is not adequately justified, that it has the potential to undermine the viability of strategic developments that are likely to be capable of securing significant biodiversity gains within the borough, and that it introduces an unhelpful focus on quantitative as opposed to qualitative ecological assessment, such that the overall aim of the policy – achieving genuine net gain – is likely to be frustrated.	A detailed justification for implementing a local BNG standard that is higher than the national minimum standard is set out in the Natural Environment Topic and in the introduction and supporting text for the policy: Surrey has suffered comparatively worse declines in biodiversity than nationally, it is imperative that this is reversed, a higher level of BNG brings greater confidence in the achievement of this objective and in doing so brings the plan into alignment with national policy.
Policy para 12	Introducing 20% as a minimum is likely to 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 (Guildford Local Plan (2019)). 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. Strategic developments have the potential to make some of the most significant contributions to BNG within the borough, such that aiming too high on BNG targets may frustrate development and the delivery of BNG targets altogether.	The viability assessment assumes across the typologies tested that a 15 – 30% additional land area / buffer over the net developable areas may be required in addition to Open Space, which provides flexibility in the amount of BNG that can be provided onsite.  In pure cost terms, the expected 19% increase on costs that results from increasing BNG from 10% to 20% is not significant and is not expected to have unacceptable impacts on viability.
Policy para 12	When combined with the pressures on development viability cited above, a target of 20% BNG that is well above the National standard is likely to introduce an overly simplistic and unhelpful focus on the quantitative ‘bottom line’. This has the potential to result in a decision making process that becomes a slave to the metric, which in turn is likely to further encourage the design of developments that go for the ‘quick	Under the new obligations introduced through the Environment Act, applicants will need to submit a Biodiversity Plan which sets out the steps taken to achieve the 'biodiversity gain objective', including through application of the mitigation hierarchy, avoiding and minimising adverse effects on existing habitats and offsite measures taken to achieve the required gain. Decision

	<p>wins' rather than those that seek to incorporate locally appropriate and ambitious BNG targets which in qualitative terms support BOA aims and objectives, amongst other nature recovery aspirations. It is, for example, far easier to achieve increases in calculated BNG units through the creation of bramble scrub than it is to create acid grassland or heathland, however the latter is likely to achieve much more meaningful long-term biodiversity gains.</p> <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 3.0 (the most current at the time of writing) acknowledges the limitations of the metric stating that "The metric uses habitats as a proxy for biodiversity. Although this is a rational means of measuring biodiversity value, it is a simplification 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>TW's view is therefore that the decision making process should recognise and support well designed schemes that take account of detailed site-specific ecological evidence, considering both quantitative BNG as assessed via the metric but also qualitative BNG set out within an ecological impact assessment.</p> <p>The Defra Metric User Guide 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. Therefore in many instances there will be significant qualitative biodiversity gains that go above and beyond the stated BNG percentage score.</p>	<p>makers will be able to scrutinise this document when considering whether Local Plan and national policy on biodiversity has been followed. This will prevent BNG becoming a numbers game.</p> <p>Policy P6/P7 includes extensive policy that ensures the best locally specific outcomes are achieved including by::</p> <ul style="list-style-type: none"> <li>• making delivery of BOA priorities a requirement (para 2),</li> <li>• requiring consideration of the future Local Nature Recovery Strategy and other local and regional strategies (para 3),</li> <li>• ensuring that planting delivers best benefit by choosing the most appropriate species (paras 5-7),</li> <li>• ensuring sites are designed to improve connectivity (para 9)</li> </ul> <p>Other policies also assist in the achievement of best biodiversity outcome:</p> <ul style="list-style-type: none"> <li>• Policy P8/P9 protects valuable habitats, including local priority species and habitats</li> <li>• Policy P12 protects and requires the enhancement of watercourses and other waterbodies and sets criteria for how this should be achieved.</li> </ul> <p>These policies provide a framework to ensure that planning proposals seek the best biodiversity outcomes and that applications can be subject to qualitative assessment, and not just a quantitative assessment in terms of the overall gain achieved under the biodiversity metric.</p>
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Policy para 12	<p>TW's view is therefore that the policy should be amended as follows:</p> <p>12) Biodiversity net gain should be demonstrated by exceeding the national minimum amount in either quantitative and/or qualitative terms, evaluated on the basis of both the Defra metric output and robust ecological impact assessment undertaken in accordance with industry guidance (e.g. CIEEM's EclA guidelines, 2019), and taking account of site-specific circumstances including viability.</p>	This is not agreed for the reasons given above.
Left blank	<b>Land at Bridge End Farm</b>	Left blank
Policy para 12	<p>Parts 12 to 17 of the draft policy refers to Biodiversity Net Gain (BNG), requiring qualifying developments to achieve at least 20% or the advised national minimum amount whichever is greater. The Environment Act 2021 introduces a statutory requirement of 10% BNG increase, however further detail on the mechanisms to achieve BNG are subject to secondary legislation. In the absence of the secondary legislation to understand the full permeations and implications associated with the various mechanisms set out in the mitigation hierarchy, it is considered that the uplift to a minimum of 20% is not justified or effective. Therefore the draft policy conflicts with the Local Plan soundness tests in paragraph 35 of the National Planning Policy Framework (NPPF) (2021).</p> <p>It is also considered that reference to the transitional arrangements set out in the Environment Act should be referenced in the supporting text to the draft Policy.</p>	<p>A detailed justification for implementing a local BNG standard that is higher than the national minimum standard is set out in the Natural Environment Topic and in the introduction and supporting text for the policy: Surrey has suffered comparatively worse declines in biodiversity than nationally, it is imperative that this is reversed, a higher level of BNG brings greater confidence in the achievement of this objective and in doing so brings the plan into alignment with national policy.</p> <p>While nationally the 10% BNG standard will be introduced in 2023, this does not indicate a problem with the introduction of a local standard ahead of this date. A small number of Local Authorities have already introduced BNG standards, which indicates that it is possible to implement BNG ahead of the national implementation date.</p> <p>The Council is in discussion with landowners who wish to set up offsite habitat banks that can provide biodiversity credits (one of which already has a client for its credits) and is also exploring projects on land it controls. The</p>

		<p>borough is home to a large amount of SANG land and other land that is not in active economic use and which would be compatible with BNG. As a result, there will be a supply of offsite credits that will make the standard achievable.</p> <p>The Biodiversity Metric 3.0 is already available to developers and consenting bodies. The metric 3.0 is still subject to revision but is ready to be used. It is an improvement on the metric 2.0, which is already used in real world developments.</p> <p>The approach to BNG is centred around the mitigation hierarchy. The hierarchy has been a key principle in the development industry for some time and the Council's view is that this does not represent a radical change in development practice.</p> <p>The policy was first proposed in the Issues and Options document that was consulted upon in June and July 2020. The following policy development process took several years and provided advanced notice of the incoming policy regime which has allowed development proposals time to adapt.</p>
Policy para 1	<p>Whilst the BNG component of the policy is to be applicable for 'qualifying' sites, part 1 of draft Policy P6/P7 requires all proposals including those exempt from the minimum biodiversity net gain to seek maximum biodiversity gain and to follow the mitigation hierarchy. The hierarchy set out in supporting paragraph 4.19 reflects the hierarchy of the Environment Act for BNG including compensation, however it is considered the supporting text should be amended to refer this applies to qualifying sites only.</p>	<p>The mitigation hierarchy is an established principle in development that predates and exists outside of the BNG approach, and it should apply to all developments.</p>

Left blank	<b>Berkeley Homes</b>	Left blank
Policy para 12	<p>Draft Policy P6/P7 requires a biodiversity net gain (BNG) of “at least 20 per cent, or the advised national minimum amount, whichever is greater”, rather than the 10% which will eventually become mandated in national guidance.</p> <p>The supporting text (para. 4.44) notes that a minimum biodiversity net gain of 20% is “higher than the proposed 10% net gain recommended nationally”, citing that “Surrey has suffered a severe biodiversity decline which is significantly worse than the country as a whole”. It also states that the 20% figure “is more consistent with the NPPF as the higher figure provides greater certainty that a genuine net gain will be achieved”.</p> <p>Within Section 98 of the new Environment Act 2021, there is provision for achieving a 10% BNG within a development, with the particulars being covered under Schedule 14 of the Act. However, secondary legislation is required under Section 4(6) of Schedule 14 of the Act before the BNG requirement becomes a legal requirement; this has yet to be completed. Hence, currently there is no legal requirement to demonstrate a 10% BNG. It does, however, indicate the direction of travel for national guidance on BNG values, which BSHL supports.</p> <p>Current national policy states that Local Authorities should, when making planning decisions, seek to minimise impacts on and provide net gains for biodiversity”, whilst paragraph 180 of the NPPF suggests LPAs should consider “opportunities to improve biodiversity in and around developments [which should] be integrated as part of their design, especially where this can secure measurable net gains for biodiversity”. It should be noted however that there is nothing within the NPPF which indicates what increase, in terms of percentage, of gain is required to comply with the</p>	<p>A detailed justification for implementing a local BNG standard that is higher than the national minimum standard is set out in the Natural Environment Topic and in the introduction and supporting text for the policy: Surrey has suffered comparatively worse declines in biodiversity than nationally, it is imperative that this is reversed, a higher level of BNG brings greater confidence in the achievement of this objective and in doing so brings the plan into alignment with national policy.</p>



	<p>policy, nor is any standardised methodology specified. There is no support either for an assertion that over provision is necessary to achieve policy objectives. Indeed, the purpose of the metric developed for calculating BNG is to ensure fairness and the sufficiency of provision.</p> <p>Given that the emerging requirement for 10% gain has been derived and tested through careful policy development, there is no justification for an arbitrary or unilateral increase beyond that figure.</p>	
Policy para 12	<p>Neither is there any evidence that the Council has considered the implications or deliverability of such a requirement.</p>	<p>The viability assessment assesses the potential impact of increasing the minimum BNG from 10% to 20% and does not consider the policy to result in unacceptable impacts. In pure financial terms the expected 19% uplift on BNG costs that result from increasing the BNG from 10% to 20% is not considered to be significant.</p> <p>The viability assessment assumes across the typologies tested that a 15 – 30% additional land area / buffer over the net developable areas may be required in addition to Open Space which provides flexibility in the amount of BNG that can be provided onsite.</p>
Left blank	<b>Guildford Residents' Association</b>	Left blank
Policy para 1	<p>Development proposals, including those exempt from minimum biodiversity net gain standards, are required to seek maximum biodiversity gain and to follow the mitigation hierarchy.</p> <p>To seek is too weak. Developments should <b><u>deliver</u></b>.</p>	<p>The phrasing is used in order to avoid implying that biodiversity overrides all other considerations, which would not be appropriate as the NPPF requires plans to deliver sustainable development across the social and economic dimensions as well as the environmental. The wording instead makes it clear that schemes must aim to maximise biodiversity gains.</p>

Monitoring indicator	<p>Monitoring Indicator: Gains in biodiversity provided by development on sites of 25 homes or greater</p> <p>The threshold of 25 homes or greater for this policy is too high to be effective in addressing the issues identified in the introduction to chapter 4. Effectiveness relies on an indicator that monitors the proportion of all development contributing to biodiversity.</p>	<p>The policy applies to all developments. The monitoring indicator is set at 25 homes as this will capture the majority of the housing supply.</p>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	<p>This policy is generally welcomed. However, it is mainly aspirational for non-BOA areas. Some specific requirements could be set:</p> <p>Landscaping proposals must give details of planting. They should provide native, natural, plants, and not quick maturing ones (such as Lelandii, Photinia, Laurel).</p> <p>At least one tree to be provided in a garden over a certain size.</p> <p>Hard surfacing must be minimised.</p> <p>TPOs will be applied to new trees that are expected to grow to become significant in the area.</p>	<p>The biodiversity policies contain a number of strong measures that protect existing biodiversity and seek the best outcomes for new biodiversity measures on all sites, including those outside BOAs.</p> <p>Policy paragraph 7 requires native planting.</p> <p>The requirement for a tree in every garden over a certain size is too prescriptive and would not guarantee that occupants would retain the tree.</p> <p>The Sustainable Surface Water Management policy promotes permeable surfaces, including soft surfaces.</p> <p>The TPO regime is separate to planning policy and a policy requiring TPO would not be effective. Significant trees that are under threat are often subject to TPO.</p>
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	<p>Buffer zones around environmentally sensitive areas should be specified, and these should 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</p>	<p>Policy P8/P9 (para 1) requires buffers around sensitive habitats, the extent of which will be decided on a case-by-case basis, except for Ancient Woodland and main rivers for which buffers are specified (in P8/P9 and P12 respectively), taking into account the specific habitat. It is</p>

	road, whereas a narrower buffer might suit a cycle way or sports ground.	not appropriate or justifiable 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).
Left blank	Words such as “expects” and “should” are too weak and will give developers too much ‘wiggle room’. These should be replaced in all instances by “requires” and “must”.	The language used in policies reflects the reality that in some situations certain outcomes may not be achievable. Where ‘expect’ is used, this indicates that there may be instances where the outcome is not achievable and this, subject to a robust justification, this would not constitute a reason for refusal.
Left blank	<b>Ripley Parish Council</b>	Left blank
Para 3.60	Support for Biodiversity sites and guidance on SANGS - 3.60 There needs to be a clear distinction between SANG and BNG provision and implementation. Furthermore, we would propose that much more thorough vetting of proposed SANG sites is undertaken, given there have been contentious issues regarding some of the more recent SANG approvals within the borough. A simple land swap from one site to another gives no real assurance for the protection of wildlife. Many new SANGs are effectively allowing new open space for residents to walk and exercise dogs, without any due consideration for the wildlife that already exist there in a relatively undisturbed environment. Meanwhile the wildlife that has been uprooted from their habitat as a result of new development still have little or no opportunity to transplant themselves elsewhere.	The supporting text and Natural England’ SANG guidelines both set out the need for ordinary SANG works and BNG works to be distinct. Where BNG is implemented on SANGs, the SANGs will be more supportive of biodiversity.
Policy para 12	Biodiversity net gain - 5.2 The Homebuilders Federation have a vested interest in ensuring maximum profit for their members and as such are always likely to object to anything	The comment is effectively suggesting that biodiversity should be prioritised over other planning obligations. The policy seeks to maximise biodiversity gain but is not

	<p>that is going to add cost. RPC advocates that this fact is recognised and GBC has some robust policies in place to counteract this inevitable discrepancy.</p> <p>[Regarding the viability appraisal] The profitability for housebuilders undertaking a new development within the borough should not be a consideration for GBC when assessing biodiversity net gain, even if it impacts upon the funding for other non-biodiversity objectives.</p>	<p>seeking to prioritise it over all other matters as this would not be reasonable or in compliance with the NPPF. The NPPF requires plans to be sustainable when considered across the economic, social and environmental dimensions.</p>
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	<p>The wording about the protection of existing habitats and what must be done is a bit weak. The term 'expected' is used frequently whereas it should be a stronger word such as 'must':</p> <ul style="list-style-type: none"> <li>• Para. 5 - change to 'Planting and landscaping ..... ARE REQUIRED TO species, habitats ...</li> <li>• Para. 6 - Tree Canopies must be retained, not 'expected to be retained'</li> <li>• Para. 7 change to 'Plantings schemes MUST ONLY use UK sourced native species, unless..</li> <li>• Para. 9 - change to 'Development proposals ARE REQUIRED to create areas...'</li> </ul>	<p>The language used in policies reflects the reality that in some situations certain outcomes may not be achievable. Where 'expect' is used, this indicates that there may be instances where the outcome is not achievable and this, subject to a robust justification, this would not constitute a reason for refusal.</p>

	<ul style="list-style-type: none"> <li>• Para. 11 - change to 'Major development proposals are REQUIRED to, and minor development proposals are expected to...'</li> </ul>	
Monitoring indicators	<p>Why only on larger developments of 25 homes or more? The monitoring should be on all size of development from a single property up. Otherwise it will encourage smaller proposals even if the developments all flow into each other - this is providing an escape loop to developers</p>	<p>The monitoring threshold is proportionate and sufficient to provide data on the effectiveness of the policy.</p>
Policy Para. 13	<p>There should be biodiversity net gain on all developments whether previously developed or not. Change this to say 'Biodiversity net gain IS A Requirement on previously developed land.</p>	<p>The policy as written is in conformity with the national approach.</p> <p>The government is currently proposing to remove the exemption for previously developed land (PDL) and if it is removed the policy will apply to PDL.</p>
Policy Para. 15	<p>The time period should be much longer. At least 100 years, otherwise companies will just bide their time and destroy the land 30 years down the track.</p>	<p>The 30 year standard is consistent with the national approach.</p>
Left blank	<p>Given that the Council has taken action to phase out the use of pesticides (for clarity - including herbicides) there is an opportunity for this approach to be included to ensure that the use of pesticides is not permitted and alternative approaches must be used throughout the development. Spraying was chosen as the means to convert existing grassland into a seedbed for "wildflowers" under recent applications. It would be far preferable to achieve an improved habitat just by introducing a suitable management regime to the existing grassland – possibly introducing some locally sourced plants that are absent but would be expected to occur in a similar, local, mature site. Thank you for</p>	<p>This would be considered overly prescriptive. It has been addressed in the supporting text, but including a prohibition on pesticides in policy would not be reasonable and if implemented as a planning condition it would be unenforceable.</p>

	<p>including the point concerning avoidance of chemical controls in policy D15 (5.257).</p> <p>Similarly, alternatives to chemical control of Oak Processionary Moth should be used where control is deemed necessary as part of a development.</p> <p>Suggest adding the following text along the lines of “The use of pesticides (including herbicides) must be avoided throughout the development and alternative, non-chemical approaches must be used for any control needed or actions aimed at achieving Biodiversity Net Gain.”</p>	
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## Policy P8/P9: Protecting Important Habitats and Species

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	Support the policy.	Left blank

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Union4 Planning</b>	Left blank
Policy para 4	The policy stance is supported, but recognition of existing developed sites within or adjacent ancient woodland should be included. In such cases, a buffer may not be practical if development is already within this zone.	The policy on buffers is intended to apply to new development. A minor modification is proposed to make this clear.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Policy para 4	Support the changes to this policy, particularly with reference to the increased emphasis placed on the importance of hedgerows.	The minimum 15m proposed buffer is consistent with Natural England's standing advice. Natural England and the Woodland

	<p>Remain concerned about the protection buffer of 15m for Ancient Woodland. There is an allocated site development going through reserved matters at the moment. This site borders one of our Ancient Woodlands on the West Horsley Place Estate and we believe that the buffer zone should be substantially increased to afford better protection for this rare habitat. Increase the buffer zone protection for Ancient Woodland where it borders new development.</p>	<p>Commission previously introduced a 50m buffer, but this was withdrawn. Given this situation, we do not believe a greater 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. The policy also states that if a greater buffer is specified by national policy, the greater buffer will apply.</p> <p>To aid clarity the following minor modification is proposed to para 4.70:</p> <p>“An appropriate buffer of a minimum of 15 metres around ancient woodland should be set at a distance necessary to preserve the nature, health and setting of the ancient woodland, taking into account the nature and area of proposed development. If national policy sets a wider minimum distance, the greater distance will apply. <u>This may necessitate a buffer of greater than the minimum 15m.</u>”</p>
Left blank	<b>Guildford Greenbelt Group</b>	Left blank
Policy para 4	<p>Significant concerns with regard to the buffer protection zone of 15m for Ancient Woodland. According to the Woodland Trust there is only 2.5% of this rich diverse habitat now covering the UK. Much of what is left is being damaged, yet it cannot be replaced.</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</p>



	<p>Policy Point 4b) pg. 44 states that "An appropriate buffer around Ancient Woodland of a minimum of 15m or a greater distance if specified by national policy". This is guided by Natural England however, they are severely understaffed, at best supplying a desk stop study for planning applications, and at worst, just referring the applicant to standard guidance on their website. This is unacceptable, and negligent given that they are a statutory body meant to be protecting and preserving our natural environment.</p> <p>GGG has made contact with NE, and they indicated clearly (we can provide proof of email exchange of views if needed) that they would be in support of LA's who challenge and set greater buffer zones where deemed necessary.</p> <p>GBC should push for a 20m buffer zone, and that they would have the backing of NE. This would give a clear indication nationally that we are in the business of protecting our environment - especially as this is now one of Corporate Priorities.</p>	<p>situation, we do not believe a greater 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. The policy also states that if a greater buffer is specified by national policy, the greater buffer will apply.</p> <p>Natural England have been consulted on the policy and have not indicated that the policy should be changed.</p> <p>To aid clarity the following minor modification is proposed to para 4.70:</p> <p>"An appropriate buffer of a minimum of 15 metres around ancient woodland should be set at a distance necessary to preserve the nature, health and setting of the ancient woodland, taking into account the nature and area of proposed development. If national policy sets a wider minimum distance, the greater distance will apply. <u>This may necessitate a buffer of greater than the minimum 15m.</u>"</p>
Policy para 4	Exclude Ancient Woodland from SANG calculations. Developers must find alternative land for SANG to prevent public access whether permitted or not.	The inclusion of Ancient Woodland within SANG will not necessarily lead to damage to the habitat, and if a proposal were deemed to do so it would be refused due to conflicts with the NPPF, the Local Plan and Natural England's SANG Guidelines.

		<p>Many Ancient Woodlands are in recreational use and suffer from the associated impacts already. Where patches of Ancient Woodland fall within a SANG there is an opportunity both to manage the existing recreational impacts better but also to reduce recreational pressure on the woodland itself by opening up new routes around the woodland and by making other parts of the SANG accessible and more attractive.</p> <p>Given the cultural and heritage value of Ancient Woodland, there is a public benefit from incorporating Ancient Woodland in public open spaces like SANGs where they can be enjoyed, assuming the management regime passes the betterment test.</p> <p>As a result of the above, a blanket prohibition on Ancient Woodland in SANG would not be reasonable or desirable.</p>
Left blank	<b>Portland Capital</b>	Left blank
Policy para. 1	<p>Criteria 1 needs to be updated to outline specific requirements in relation to appropriate buffers/barriers between built development and sensitive habitats. Current policy wording defines the appropriate buffer for ancient woodland but for example there is no further detail about requirements for aquatic habitats. A requirement for such provision should be reviewed on a site-by-site basis and will have viability implications for deliverability which should be recognised in final policy wording. This is reflective of the consideration of viability set out at paragraphs 68 and 124 of the NPPF outlined previously.</p>	<p>It is not reasonable to specify buffer zones for sensitive habitats unless there is a legal or evidential basis or national policy support (e.g. as there is for the Thames Basin Heaths, Ancient Woodland and main rivers). Additionally, given the variety of habitats likely to be encountered in planning applications, it may not be feasible to do so. Appropriate buffers are better considered on a case by case basis.</p>

Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	<p>Support the proposals to identify, map and safeguard components of ecological networks but suggest that the wildlife corridors and stepping stones detailed in the Effingham neighbourhood plan are mentioned in the proposals. The wildlife corridors and stepping stones designated in the Effingham Neighbourhood Plan are already coming under pressure from developers including with the development of the new Howard of Effingham school at Effingham Lodge Farm. The developer in this case whilst recognising the importance of wildlife corridors will, in effect, block an important wildlife corridor with the development of the new school. EPC suggests that there should be enhanced wording in the proposals to warn developers that the blocking of wildlife corridors and the encroachment of developments into stepping stones and ancient woodland will not be allowed without evidence of very special circumstances.</p>	<p>Neighbourhood plans are Development Plan Documents (DPD) in their own right and will be read alongside the Local Plan and other DPDs. Paragraph 6c of the policy states that wildlife corridors and stepping-stones as defined ... in Development Plan Documents will be considered priority habitats.</p>
Left blank	<b>Martin Grant Homes</b>	Left blank
Policy para 2	<p>Part 2) relating to 'Irreplaceable habitats' repeats content set out in paragraph 180 of the NPPF. In line with paragraph 16(f) of the NPPF, this text should be removed so as to avoid unnecessary duplication. The inclusion of the text within policy P8/P9 provides no additional merit or commentary over and above what is contained within the NPPF. Instead, it is suggested that Policy P8/P9 should set out that irreplaceable habitats will be assessed in line with current NPPF guidance.</p>	<p>Paragraph 2 repeats some NPPF content but sets out further details covering compensation strategies and the application of the "wholly exceptional reasons" test not covered by the NPPF. While the NPPG does provide guidance on the "wholly exceptional reasons test", this matter is of sufficient importance to warrant inclusion in policy. As a result, the policy is justified.</p>
Policy para 5	<p>We support the principle of retaining existing trees where feasible and appropriate. In this regard, expecting trees to be incorporated into development proposals regardless of their quality and purely because they fall within the vaguely defined category of 'significant trees' is not</p>	<p>Paragraph 4.59 defines 'significant trees' as all ancient and veteran trees, ancient woodland, trees that are special because of a special heritage, recreational, social or aesthetic value,</p>

	<p>sound. The definition provided at paragraph 4.59 takes no account of the quality of trees and includes several subjective categories which mean there is potential for considerable debate as to whether a tree is 'significant'. Tree retention should be informed by the findings of an arboricultural report to ensure quality considerations are also factored into design and decision making.</p>	<p>and trees covered by a Tree Protection Order (TPO) or are of TPO quality.</p> <p>The point about arboricultural reports is noted and agreed; this is how in practice the specific value of trees will be established. A minor modification in the supporting text is proposed as follows:</p> <p>all ancient and veteran trees, ancient woodland, trees that are special because of a special heritage, recreational, social or aesthetic value, and trees covered by a Tree Protection Order (TPO) or are of TPO quality, <u>established through an arboricultural report.</u></p>
H	<b>Thakeham Homes</b>	Left blank
Left blank	<p>Concerned by the new definitions being introduced in respect of Irreplaceable Habitats which do not appear consistent with the NPPF. The Surrey Nature Partnership "Irreplaceable Habitats Guidance for Surrey" dated 2020 was formulated on draft Natural England guidance dated 2015, which we believe has now been superseded. Reference to this should be deleted.</p>	<p>The Council is of the view that all the habitats listed at 4.66 meet the definition of irreplaceable.</p> <p>The Surrey Nature Partnership (SyNP) is the Local Partnership mandated by government to lead on biodiversity recovery in Surrey. As a result, it is appropriate that SyNP sets guidance on what should be considered irreplaceable habitat, and that Local Plans should refer to this guidance. If the guidance is out of date, it will be updated in due course. The policy is worded so to refer to the most recently produced guidance.</p>

Left blank	The Local Nature Recovery Strategy is referenced, but is yet to be prepared. The development of this should follow the guidance from the Government's pilot project in being collaborative and in consultation with all stakeholders.	This point is noted. It is not clear what role the Council will play in producing the Local Nature Recovery Strategy at this stage.
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	Object - support the overarching principles of this policy, although raise a number of concerns with this policy as presently worded. As worded the policies are ineffective.	The specific points are addressed below.
Policy para 1	<p>It will not always be possible to enhance ecological features on land adjacent to a development site which are outside of the applicant's control. On this basis, propose the following change:</p> <p>Development proposals for sites that contain or are adjacent to irreplaceable habitats, priority habitats, habitats hosting priority species, sites designated for their biodiversity value and all aquatic habitats are required to preserve the relevant ecological features through the application of the mitigation hierarchy, and <b>where possible</b> deliver enhancements to the ecological features in line with Policy P6/P7.</p> <p>If GBC insist that the suggested addition is not required, because, as per their Regulation 18 response "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.", then this should be clearly explained in the supporting text to aid the interpretation of policy wording.</p>	<p>The addition of 'where possible' would not serve a purpose as clearly impossible measures would not be required.</p> <p>As per the regulation 18 response, onsite measures can support and enhance offsite habitats and our view is that this will be reasonably understood by applicants and decision makers.</p>
Policy para 3	Being listed on an inventory does not automatically mean something is irreplaceable. The supporting text claims in paragraph 4.68 that the Surrey's Revised Ancient Woodland Inventory 2011 (RAWI) "provides	We do not agree that the RAWI should be limited to a guide to inform assessment.

	<p>a well-documented and consistent approach to establish whether land is ancient woodland”, but the revision was an entirely desk-based exercise and the 2011 document is clear that woodland identified as ancient is only done so on a provisional basis (see para 3.2.7, page 33). It does not therefore ‘clearly establish whether land is ancient woodland’ and is therefore ‘irreplaceable’.</p> <p>TW’s view is that there should always be scope for review of relevant evidence in interpreting whether a habitat is truly irreplaceable, as defined by the NPPF. Satisfaction of the NPPF definition should be the acid test, not inclusion on provisional inventories or other strategies that have not been subject to independent scrutiny as part of an examination. The potential for erroneous and subjective interpretation of the ecological importance of land that is not founded upon sound site-specific evidence can otherwise precipitate through the planning system. The supporting text states that challenges to the RAWI should be made before an application is submitted, with the RAWI amended. The RAWI challenge process is protracted and fraught with uncertainty, therefore there should always be scope to consider primary evidence contained within an ecological assessment as part of a fair and transparent decision-making process.</p> <p>TW supports the first part of part 3) to the first comma, but Local Nature Recovery Strategy (LNRS) and inventory should be seen as a guide, not to pre-determine the outcome of detailed, site-specific, evidence-led ecological assessment. On this basis TW propose the following changes:</p> <p><i>A habitat will be considered to be irreplaceable if it meets the definition in the NPPF glossary or guidance issued by the Surrey Nature Partnership, <u>in addition</u> or if it is identified as irreplaceable in the Local Nature Recovery Strategy, or it is on land identified in an established inventory, such as the Revised Ancient Woodland Inventory (RAWI), <u>should be seen as a guide to inform the assessment of potentially important ecological features.</u></i></p>	<p>The RAWI at 3.2.7 states a proportion of the woodlands were subject to ground survey with the majority assessed through map and archive data, sources which it describes as “highly accurate”. It does indicate that the inventory is regarded as provisional and that new evidence may come forward to challenge the status (as well as possibly to allow new woodlands to be added) but it then states that when information is provided to Natural England, it will be considered and a decision taken on whether a site should be removed or added to the inventory. While this could be done during the planning application process, it could equally be undertaken by an applicant at any time.</p> <p>The Council’s view is that it is the most appropriate for the RAWI register holder to decide on a challenge to AW status as:</p> <ul style="list-style-type: none"> <li>• They are the dataset holders.</li> <li>• They best understand the initial process for selection and whether the woodland was surveyed and the mapping information provided.</li> <li>• The RAWI data is used for a number of purposes and changes have the potential for far ranging consequences, such as impacting nature recovery strategies or funding for biodiversity works, which local and PINs planning decision makers may be unaware of.</li> <li>• If a decision is made by a planning decision maker, it might not subsequently be</li> </ul>
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accepted by the RAWI holders or the inventory updated, leaving the status of the challenged woodland ambiguous.

- Challenges should be handled in a consistent manner across LPA boundaries, whereas local and PINs planning decision makers may not be consistent with one another.
- the ecological features of an area of AW should not be the only determinant of whether land is AW. Much of the value AW resides in its soils (see LPDMP para. 4.69) and where AW has degraded but the soils retain the ability to support an AW habitat, it should be rehabilitated rather than declassified. This judgement requires specialist knowledge and as a result should be left to the statutory body rather than planning decision makers.

It is agreed that there should be scope for reviewing the evidence that establishes whether woodland is AW, but our view is that in order to deliver an effective, efficient and plan-led planning system, and to avoid delays in planning decisions, the route for challenging AW designations should be through the RAWI and not through a planning application for the reasons set out above.

There is precedent for relying on Ancient Woodland inventories in planning decisions, for example Enquiry APP/Y9507/A/12/2173809 Fernhurst, Kent Decision date: 24 July 2013 - A proposal for a single large dwelling within part of an ancient woodland, where the

		<p>inspector found “The inventories are an important tool for policy makers and to assist planners in making decisions about development. Accordingly, it was an important tool for the authority when it considered the application the subject of this appeal. ... I do not consider that it would be unreasonable for the authority to rely upon the recently updated RAWI to identify whether a particular woodland meets the NPPF definition or not”.</p> <p>The recent DCO for the M25 improvements also includes precedent where the landowner of Heywood Girl Guides camp argued that an area of woodland identified as AW on the RAWI should not be considered as such because the RAWI was provisional (written representation REP1-026). However, Highways England stated that it was confident that the status and boundaries established in the RAWI are correct.</p> <p>Given the level of loss of AW (12% of AW in surrey has been lost in the last 50 years), the rigorous approach set out in policy is justified.</p>
<p>Paragraphs 4.66 and 4.74-4.77 (important hedgerows)</p>	<p>The supporting text sets out the NPPF definition of ‘irreplaceable habitats’ but the text goes on to wrongly conflate truly ancient irreplaceable hedgerow habitat with ‘important’ hedgerows, as per the GOV.UK definition. This definition of ‘important’ hedgerows derives from The Hedgerow Regulations 1997, which is intended to protect hedgerows in the context of land management practices that are not governed by the planning system. The definition of ‘important’ hedgerows under the Hedgerow Regulations does not provide a robust and reliable means of defining irreplaceable habitat, and GBC’s</p>	<p>A species rich hedge is a very valuable habitat, but in many cases it may also be an ancient hedgerow and therefore irreplaceable habitat. Where proof has been provided that a species rich hedgerow is not ancient, it may still be the case that it provides supporting habitat or connectivity for an ancient hedgerow. Removal of the species rich hedgerow might therefore result in deterioration to the connected ancient</p>



	<p>proposed approach serves to conflate the value of the underlying vegetation, including its historic importance, with its role in supporting protected species which may be common and widespread in a given site or location and are in any event required to be protected through other elements of the policy as well as legislation. All of the other criteria outlined by GOV.UK regarding important hedgerows are arguably more relevant than the 30 year age and protected species/rare species criteria. For example, a hedgerow only 30 years old supporting a common species of bat or reptile (both species listed on the Wildlife and Countryside Act) would certainly not be “technically difficult or take a very significant time to replace”, and would therefore not be consistent with the NPPF definition for an irreplaceable habitat. TW request that the supporting text (paragraph 4.66g) is altered to state that ancient hedgerows are irreplaceable, but that ‘important’ hedgerows, as per the GBC cited definition, should be considered as ‘priority habitat’ as per the former UK BAP, i.e. this part should be deleted from paragraph 4.66g.</p> <p>If GBC remains of the view that irreplaceable hedgerow habitats can include habitats of only 30 years of age that support protected / threatened species use, then further clarification is required within the supporting text to define:</p> <ul style="list-style-type: none"> <li>a) the schedule(s) of the WCA of relevance (some species are only protected from sale) and</li> <li>b) the distribution, population size, and other factors influencing the ecological importance of said protected / threatened species, or other factors such as their functional dependence on a hedgerow in question, that might be considered relevant to the interpretation of whether the habitat is truly ‘irreplaceable’. The potential issue is the presence of one occasional grass snake within a hedgerow that is 30 years old, or one sighting of a common pipistrelle bat, should not be sufficient to render a hedgerow irreplaceable and thus essential for retention within a development site.</li> </ul>	<p>hedgerow so in many cases it should receive the same level of protection. Given the importance and level of protection accorded to ancient hedgerows as irreplaceable habitats, our view is that the policy should not be changed as suggested.</p> <p>It should be noted that the policy refers to ‘important’ hedgerows, which are at least 30 years old and in most cases will be older than 30 years. Additionally, where important hedgerows contain rare species, the odds of the same species community re-establishing are reduced because of the relatively lower population available to recolonise a replacement habitat. As a result, we think they qualify as irreplaceable habitats.</p> <p>The use of the word “contain” in the supporting text is intended to mean that an important hedgerow is irreplaceable if it supports an established population of protected, endangered, threatened or rare species, rather than infrequent or chance visits by individuals of such species. A minor modification has been suggested to make that clear.</p> <p>The point about some protected species not being rare is noted, but the government’s important hedgerow guidance does not distinguish between animals protected for rarity or for other reasons, and the policy is consistent with that guidance.</p>
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	<p>If the latter is GBC's position, this has the potential to very significantly and unduly constrain the positive masterplanning process for suburban and rural schemes, which are already required to assess the potential value of important ecological features, including hedgerows, and to protect and enhance in accordance with the mitigation hierarchy and other elements of GBC policy. The inclusion of 'important' hedgerows as per GBC's suggestion, as 'irreplaceable' habitats, therefore undermines the sound basis for ecological impact assessment and the correct application of wider GBC policy, and has the potential to unnecessarily constrain the design and viability of sustainable development.</p>	
Left blank	<b>Compton Parish Council</b>	Left blank
Policy para 2	<p>Support aim to protect irreplaceable habitats, does not feel that the wording of Policy P8 provides this protection. In particular Bullet Point 2, which allows the loss, damage or deterioration of irreplaceable habitats by development, if "there are wholly exceptional reasons and the exceptional benefits of the development proposal outweigh the loss of the habitats, demonstrated through unequivocal and credible evidence". The term "exceptional" is a subjective and Compton PC feels that these "exceptional reasons" and "exceptional benefits" need to be spelt out for the policy to have meaning.</p>	<p>The wholly exceptional reasons test reflects the wording in the NPPF at 180c.</p>
Policy para 4	<p>The buffer zone around ancient woodland should be increased to 50m in line with recommendations by the Woodland Trust</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 greater 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</p>

		<p>undeveloped land within the public realm, which will allow for a larger buffer if one is necessary to protect root structures. The policy also states that if a greater buffer is specified by national policy, the greater buffer will apply.</p> <p>To aid clarity the following minor modification is proposed to para 4.70:</p> <p>“An appropriate buffer of a minimum of 15 metres around ancient woodland should be set at a distance necessary to preserve the nature, health and setting of the ancient woodland, taking into account the nature and area of proposed development. If national policy sets a wider minimum distance, the greater distance will apply. <u>This may necessitate a buffer of greater than the minimum 15m.</u>”</p>
Policy para 4	Disagree with the suggestion that a road should be used to separate ancient woodland from housing development. Building a road adjacent to ancient woodland could have a negative impact on this sensitive environment in terms of noise, air pollution and wildlife.	This comment appears to relate to the Regulation 18 preferred option. In the regulation 19 plan, the wording was amended to refer to a “lightly trafficked road” to ensure that noise, light and pollution do not harm ancient woodlands. However, a road remains a suitable barrier to protect woodland from encroachment and clearance.
Policy para 5	Too weak - 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.
Left blank	<p>Insufficient protection to priority species and habitats. 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>The mitigation hierarchy is an established principle in development, and under the Environment Act applicants for planning permission will have to submit a biodiversity report setting out how it has been applied. This report can be scrutinised by planning decision makers. As a result, we do not think that it provides “wiggle room”, though it does allow some level of flexibility which is necessary as circumstances will differ from site to site.</p> <p>The point about compensatory habitat is taken. Under the Environment Act, the value of new habitats is taken to be the value 30 years after the work is carried out. The Local Plan is consistent with that approach. It would not be reasonable to demand that new habitats achieve their full value immediately.</p> <p>The policies in the plan protect important habitats and the Environment Act biodiversity net gains approach creates a strong incentive to preserve the most valuable habitat.</p>
Left blank	<b>Campaign to Protect Rural England</b>	Left blank
Policy para 4	<p>Policy P8/P9 (4) (b) requires an “appropriate buffer around the ancient woodland of a minimum of 15 metres or a greater distance if specified by national policy” in line with the buffer zone of at least 15 metres stipulated in Natural England’s and the Forestry Commission ‘Standing Advice’ on Protecting Ancient Woodland. The policy does not mention conditions to be applied to approving drainage schemes. We would</p>	<p>The buffer in policy covers all types of development, which would include drainage works.</p>

	ask that in line with the Standing Advice' just referenced that only sustainable drainage schemes be approved that do not affect root protection areas or result in any change to the water table that negatively affects ancient woodland or ancient and veteran trees.	
Left blank	The policy proposal is also silent on conditions to be applied to the building works. We would suggest the policy be supplemented by an additional requirement that steps should be taken to ensure that trees and their roots systems, particularly near the woodland boundary, are not damaged during the building work.	Planning conditions are generally not a matter for policy. Planning conditions will be applied in the event that a scheme receives planning consent and they are necessary to ensure the works are carried out in a manner that avoids unacceptable impacts. The policy sets out the outcomes that must be achieved and planning decision makers can apply conditions where there are concerns about harm to habitats.

### Other respondents

Paragraph	Main Issue Summary	GBC Response
Policy para 1 – Mitigation hierarchy	<p>Concern over whether it will prevent damage to protected areas and species or whether need for development will outweigh habitats and species.</p> <p>Remove the words 'through the application of the mitigation hierarchy'. These habitats and species should be protected and if a development will impact them, the development should not go ahead. Mitigation hierarchy should not apply to habitats and species that have been identified as of great conservation importance.</p>	<p>The mitigation hierarchy is an established principle in development, and under the Environment Act applicants for planning permission will have to submit a biodiversity report setting out how it has been applied. This report can be scrutinised by planning decision makers. As a result, we do not think that it undermines protection of important habitats, though it does allow some level of</p>

		<p>flexibility which is necessary as circumstances will differ from site to site.</p> <p>The policies in the plan protect important habitats and the Environment Act biodiversity net gains approach creates a strong incentive to preserve valuable habitats.</p>
<p>Ancient woodland</p>	<p>Ancient Woodlands and ancient or veteran trees are irreplaceable. It is regrettable that the Local Plan includes sites adjacent to ancient woodland. The issues that require a buffer are acknowledged in the additional wording. The buffer should be increased. 20m buffer proposed.</p> <p>They should be managed to enhance the woodland character.</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 greater 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. The policy also states that if a greater buffer is specified by national policy, the greater buffer will apply.</p> <p>The policy requires developments to enhance the habitats listed in paragraph 1, including Ancient Woodland.</p> <p>To aid clarity the following minor modification is proposed to para 4.70:</p> <p>“An appropriate buffer of a minimum of 15 metres around ancient woodland should be set at a distance necessary to preserve the</p>

		nature, health and setting of the ancient woodland, taking into account the nature and area of proposed development. If national policy sets a wider minimum distance, the greater distance will apply. <u>This may necessitate a buffer of greater than the minimum 15m.</u>
Policy paras 2 and 3 - Irreplaceable habitats	Para 2 - remove the section 'unless there are wholly exceptional reasons and the benefits of the development proposal outweigh the loss of the habitat' - development does not outweigh the loss of an irreplaceable habitat.	The wholly exceptional reasons test reflects the wording in the NPPF at 180c.
Significant trees	Include a requirement that TPOs will be applied to significant trees as part of any approval given and if significant trees are removed prior to an application this will result in refusal.	The TPO regime takes place outside of planning policy. Including this in policy would have no impact – the Council can review a tree for TPO status at any time.

## Policy P10: Land Affected by Contamination

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	Support the policy.	Noted.

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Barton Willmore LLP on behalf of Martin Grant Homes</b>	Left blank
Part 4	To be sound, Part 4) should acknowledge that in some circumstances it may not be possible to provide detailed assessed of contamination risks to inform initial decision making and that it may be appropriate in such circumstances to secure the provision of additional information by planning condition. Such an approach would provide certainty that appropriate work will be undertaken to identify, and where necessary remediated, contamination without unduly prohibiting development. Part 4) should therefore be amended as follows:	<p>Criterion 4 requires sufficient information (in the form of an appropriate site risk assessment) which is considered to align with the PPG on Land affected by contamination and does not preclude the use of conditions to manage risk. PPG (Paragraph: 007 Reference ID: 33-007-20190722) indicates:</p> <p>“Unless this initial assessment clearly demonstrates that the risk from contamination can be satisfactorily reduced to an acceptable level, further site investigations and risk assessment will be needed <u>before the application can be determined.</u>”</p>



	<p><b>Where insufficient information is provided <u>and it is not possible to secure the provision of further information by condition</u>, or the relevant reports indicate that there will be an unacceptable adverse impact on sensitive receptors which cannot be adequately prevented, avoided, and/or mitigated through appropriate remedial measures, the planning application will be refused.</b></p>	<p>Further, it is acknowledged that the level of detail to be provided as part of site risk assessment is dependent on the level of risk identified. Criterion 1 requires that 'appropriate' SRA is required, rather than a detailed assessment. This is clarified under paragraph 4.96 and the referenced EA LCRM guidance which includes a tiered approach to risk assessment.</p> <p>Relying on conditions to attain further information would inhibit the ability of the Council to effectively safeguard sensitive receptors from the risks of contaminated land. Paragraph 56 of the NPPF (2021) states planning conditions should be kept to a minimum, and conditions required to be discharged before development commences should be avoided, unless there is clear justification. Furthermore, Paragraph 4.92 directs applicants to national PPG (Paragraph: 008 Reference ID: 33-008-20190722) where it states:</p> <p>"...before granting outline planning permission a local planning authority will, among other matters, need to be satisfied that:</p> <ul style="list-style-type: none"> <li>• it understands the contaminated condition of the site;</li> <li>• the proposed development is appropriate as a means of remediating it; and</li> <li>• it has sufficient information to be confident that it will be able to grant permission in full at a later stage bearing in mind the need for the necessary remediation to be viable and practicable."</li> </ul>
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank

Left blank	<p>However, it is unclear the extent to which the Council would be prepared to come to a different conclusion where there is a question over any submitted Contamination reports within a planning application which fails to meet this requirement. Is this policy enforceable and would the Council ask a third party consultant to review it?</p>	<p>Contamination reports/Site Risk Assessments have to be undertaken in accordance with the Environment Agency's LCRM and Criterion 4 states if an application failed to meet the requirements it would be refused.</p> <p>The policy is enforceable and reports will be assessed by the Council's Environment and Regulatory Services and the planning decision maker.</p>
Left blank	<p><b>Savills Planning on behalf of St Edward Homes Ltd</b></p>	Left blank
Left blank	<p>The policy is not necessary. If the policy is retained it should be amended to include reference to the use of planning conditions to secure the investigation works / assessments, where appropriate.</p>	<p>The policy is necessary as it ensures planning permission will not be granted until appropriate remedial measures have been agreed following the appropriate Site Risk Assessment. This is to make sure that the Council only grants permission for sites that can be made suitable for the proposed use.</p> <p>Relying on conditions to attain further information would inhibit the ability of the Council to effectively safeguard sensitive receptors from the risks of contaminated land. Paragraph 56 of the NPPF (2021) states planning conditions should be kept to a minimum, and conditions required to be discharged before development commences should be avoided, unless there is clear justification. Furthermore, Paragraph 4.92 directs applicants to national PPG (Paragraph: 008 Reference ID: 33-008-20190722) where it states:</p> <p>"...before granting outline planning permission a local planning authority will, among other matters, need to be satisfied that:</p>

		<ul style="list-style-type: none"> <li>• it understands the contaminated condition of the site;</li> <li>• the proposed development is appropriate as a means of remediating it; and</li> <li>• it has sufficient information to be confident that it will be able to grant permission in full at a later stage bearing in mind the need for the necessary remediation to be viable and practicable.”</li> </ul>
Left blank	<b>Savills Planning on behalf of Bloor Homes</b>	Left blank
Left blank	<p>However, the necessity of the policy is questioned, as GBC have the ability to include the requirements of the policy in their validation list. GBC would also have the ability to use planning conditions for some of the relevant requirements of the policy too.</p> <p>The policy is not necessary.</p>	<p>The policy is necessary as it ensures planning permission will not be granted until appropriate remedial measures have been agreed following the appropriate Site Risk Assessment. This is to make sure that the Council only grants permission for sites that can be made suitable for the proposed use.</p> <p>A validation list would not provide guidance of the procedure required to ensure that the proposed development does not present an unacceptable risk to the health of sensitive receptors.</p> <p>Relying on conditions to attain further information would inhibit the ability of the Council to effectively safeguard sensitive receptors from the risks of contaminated land.</p>
Left blank	<b>Savills on behalf of Taylor Wimpey</b>	Left blank

Left blank	<p>This policy should be reworded as it is not positively prepared or justified as per the NPPF. TW consider that, as worded, the policy requires extensive information on the submission of a planning application, which could otherwise be subject to a condition.</p> <p>The policy seeks for contamination assessments to be conducted and submitted at the time of the application.</p> <p>It is normal practice for this to be a conditioned upon granting planning permission. TW seek for this policy to be altered to the following if it is preferred that this policy remains in the plan.</p> <p><i>“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>”</i></p> <p>If GBC insist that they wish to keep the detail within this policy, then at the very least TW request that a line is added to the policy so it is clear that this information can be conditioned, detailed on the approved decision notice.</p> <p>Overall, TW object to this policy on the basis it act to hinder development being approved as it requests costly works to be completed prior to a planning consent, when in fact it still has the ability to control development by including a pre-commencement condition on the matter.</p>	<p>The policy is positively prepared and justified as it provides a strategy which seeks to meet the area’s assess needs based on proportionate evidence, as stipulated by the NPPF.</p> <p>The historic industrial nature of Guildford borough’s towns and villages has given rise to contamination, or potential contamination which needs to be appropriately addressed. The policy is necessary as it ensures planning permission will not be granted until detailed proposals for remediation have been agreed following the appropriate Site Risk Assessment. This is to make sure that the Council only grants permission for sites that can be made suitable for the proposed use.</p> <p>The use of a pre-commencement condition would inhibit the ability of the Council to effectively safeguard sensitive receptors from the risks of contaminated land.</p>
Left blank	<b>Guildford Residents Association</b>	Left blank

Left blank	<p>Para 2a) insert:</p> <p>1. the appropriate sustainable remediation measures, <b><i>including monitoring</i></b>, that will be implemented in order to prevent and/or avoid significant harm to sensitive receptors</p> <p>Monitoring provides an essential assurance link between a remediation strategy and verification reporting.</p> <p>Monitoring Indicator:</p> <p>This should be linked to an environmental outcome relevant to all contaminated sites not to a measure that would discourage consideration of contamination by an inspector in those cases that go to inquiry or appeal.</p>	<p>This is not considered necessary. The Verification Report submitted to the Council in Criterion 3 ensures the appropriate remediation measures have been implemented.</p> <p>Monitoring indicators assess the effectiveness of the LPDMP policy. Ultimately the policy will be tested through the appeal process when an inspector will consider how much weight should be given to it in determining the appeal. It is for this reason that its success at appeal, in being used as a reason for refusal in dismissing appeals, is used as the monitoring indicator for the vast majority of the policies.</p>
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	In addition to the policies laid out, greater resources in the enforcement department would help avoid contamination taking place.	This is beyond the scope of the LPDMP.

## Policy P11: Air Quality and Air Quality Management Areas

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Union4 Planning</b>	Left blank
Left blank	The need to improve air quality is strongly supported, but there should be recognition of schemes which have the ability to improve air quality overall across a wider area through supply chain and process improvements, rather than specifically on site. In such cases, whilst on site emissions may be increased, if the overall reduction across the region can be achieved, then such developments should be supported.	Policy para 1 already states that development proposals should have regard to the need to improve air quality and reduce the effects of poor air quality. However, development proposals that result in significant adverse impacts on sensitive receptors which cannot be avoided or mitigated will be refused. A policy that addresses pollution in the wider supply chain would be outside the scope of a local development plan.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	What is the threshold required to improve air quality and at what distance to sensitive receptors?	Standard assessment processes and 'best practice' guidance are set out in various guidance on Air Quality Assessments and Emissions Mitigation Assessments.  The Reasoned Justification 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 Environment and Regulatory Services, which should be proportionate on a case-by-case basis.
Section 8	It is unclear what the authority would do with the contributions collected. This requires specification eg: for Tree Planting, Sound Barriers, Air filtering plants?	If required, the nature and extent of financial contributions used would be dependent on the development proposed and associated impact, determined on a case-by-case basis.
Left blank	<b>Savills Planning on behalf of Bloor Homes</b>	Left blank
Left blank	<p>Bloor Homes objects to this policy due to its ambiguity and duplication of National Policy, such as Paragraph 185 of the NPPF.</p> <p>It is not clear to which applications Policy P11 applies, or how the policy applies proportionately to each application.</p>	<p>It is considered that policy provides additional detail to the NPPF, such as stipulating relevant guidance and procedure to be followed to ensure there are no significant adverse impacts on sensitive receptors. Whilst there may be an element of overlap between the NPPF and Policy P11 this is not considered to be an issue so long as there are no contradictory statements.</p> <p>P11 applies to all development proposals, in line with Paragraph 185 of the NPPF. Information in the Reasoned Justification provides guidance that allows the applicant to determine what is required for a development, it is considered overly prescriptive to set out specific standards as the requirements will vary on a case-by-case basis. Furthermore, Criterion 3 provides details of the types of development that would require an Air Quality Assessment.</p>
Left blank	It is noted that Paragraph 16 of the NPPF requires policies to be clearly written and unambiguous, evident how 'a decision maker should react to development proposals'.	It is considered the wording of the Criteria is sufficiently clear. The Reasoned Justification provided further detail to support

	In Points 1 and 2 of the Policy, it is not clear how a decision maker should react to these statements, and there is no measure suggested to determine what would be needed to satisfy the statements.	<p>the policy and ensure the decision maker reacts appropriately to a development proposal.</p> <p>Paragraph 4.114 states that applicants should demonstrate the proposed development has been designed and will be implemented in accordance with 'good practice' principles outlined in the IAQM guidance. This information would enable the planning decision maker to determine if the requirements of Criteria 1 and 2 have been satisfied.</p>
Left blank	There also needs to be some further detail on what constitutes 'significant impacts', and how this can be measured by the LPA.	Paragraph 4.128 of the Reasoned Justification states the Council's Environment and Regulatory Services will determine the significance of the impacts on a case-by-case basis in agreement with the air quality professional that conducted the assessment.
Left blank	Whilst Bloor Homes supports the aim of the policy, the requirements for an Air Quality Assessment to support a planning application should be set out clearer. GBC's local validation list could be used as a mechanism to ensure relevant information is submitted with applications, as opposed to using adopted policy.	<p>The policy provides detail and guidance that allows the applicant to better understand what is required and submit information to ensure the planning decision maker can reach an informed decision.</p> <p>A validation list would not provide guidance of the procedure required to ensure that the proposed development does not present a significant adverse impact on sensitive receptors.</p>
Left blank	<b>Savills on behalf of Taylor Wimpey</b>	Left blank
Left blank	<i>"1) Will only permit development where it will not give rise to <u>material or severe</u> adverse impacts on health and quality of life from air pollution".</i>	This comment refers to the wording of Policy P11 at the Regulation 18 Issues and Preferred Options Consultation rather than the Regulation 19 Proposed Submission document.



		The policy has since been redrafted and reworded to make reference to significant adverse impacts. This represents industry best practice and is sufficiently clear.
Left blank	<p>3.41. <i>“Mitigation”</i> 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:</p> <p>“4) Requires applicants to demonstrate that appropriate <del>mitigation</del> <u>avoidance measures</u> will be provided to ensure that the new development is appropriate for its location and unacceptable risks are avoided”.</p>	<p>This comment refers to the wording of Policy P11 at the Regulation 18 Issues and Preferred Options Consultation rather than the Regulation 19 Proposed Submission document.</p> <p>The policy has been redrafted and reworded to reference both avoidance and mitigation measures as this represents industry best practice. Mitigation measures are not necessarily onerous, examples of such measures are regularly deployed within development proposals as standard.</p>
Left blank	<p>In addition, paragraph 4.126 provides an unrealistic requirement for air quality information during pre-application process. Such information is typically informed by traffic assessments, which typically come together toward the latter stages of application preparation. Air quality information at pre-application might be more realistically based on baseline surveys, and projections based on transport assessment scoping. TW suggest that paragraph 4.126 is <u>deleted</u>.</p>	<p>National PPG (Paragraph: 007 Reference ID: 32-007-20191101) states assessments need to be proportionate to the development proposed where “the scope and content of supporting information is best discussed and agreed between the local planning authority and applicant before it is commissioned.”</p> <p>Providing air quality information upfront allows development to be more implementable and deliverable by reducing usage of planning conditions, in line with Paragraph 56 of the NPPF. In light of this Paragraph 4.126 has been amended to state:</p> <p><b><i>“Initial</i></b> Air Quality Assessments must be completed during the early stages of the design and preparation of the development proposal. If the applicant has engaged the Council's preapplication service, the <b><i>initial</i></b> Air Quality</p>

		<p>Assessment should be submitted and reviewed as part of this.”</p> <p>Undertaking these initial assessments at an early stage will help inform initial discussions with the decision maker while further, more detailed, work can be completed through the planning application process to adequately address air quality impacts.</p>
Left blank	<b>Guildford Residents Association</b>	Left blank
Left blank	<p>The way this policy is drafted would not prevent a number of developments, that may not be considered ‘major’, cumulatively causing the air quality in an area to deteriorate to an unacceptable level.</p> <p>The cumulative effects part of Policy 3a) should be redrafted so this relates to <b><i>all development</i></b> that would contribute adversely through its height, layout and design, in combination with other development, to pollution levels.</p>	<p>The current wording is considered sufficient in addressing the cumulative impact of development on air quality. Paragraph 4.114 states that applicants should demonstrate a proposed development has been designed and will be implemented in accordance with ‘good practice’ principles outlined in the IAQM guidance. This information would enable the planning decision maker to determine if there will be a significant adverse impact on sensitive receptors.</p> <p>The policy approach ensures the assessment is proportionate to the scale of the proposed development as it would be onerous to require all development to undertake an air quality assessment.</p>
Left blank	<p><b>Monitoring Indicator</b></p> <p>This should be linked to an environmental outcome not to a measure that would discourage consideration of air quality by an inspector in those cases that go to inquiry or appeal.</p>	<p>Monitoring indicators assess the effectiveness of the LPDMP policy. Ultimately the policy will be tested through the appeal process when an inspector will consider how much weight should be given to it in determining the appeal. It is for this reason that its success at appeal, in being used as a reason</p>

		for refusal in dismissing appeals, is used as the monitoring indicator for the vast majority of the policies.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	<p>We would suggest replacing the sentence in point 1 “In particular, development proposals within or adjacent to an Air Quality Management Area (AQMA) will be expected to be designed to mitigate the impact of poor air quality on future occupiers” with “In particular, development proposals within, adjacent to, <u>or impacting on</u>, an Air Quality Management Area (AQMA) will be <u>required</u> to be designed to mitigate the impact of poor air quality on existing and future occupiers”.</p>	<p>This comment refers to the wording of Policy P11 at the Regulation 18 Issues and Preferred Options Consultation rather than the Regulation 19 Proposed Submission document.</p> <p>Policy wording has been added in order to strengthen the protection of Air Quality Management Areas: Criteria (3)(c) and (d) require that an Air Quality Assessment is submitted where:</p> <ul style="list-style-type: none"> <li>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).</li> <li>d) the proposed development would be likely to result in the increase of pollution levels within an Air Quality Management Area (AQMA).</li> </ul> <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>

Left blank	<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>This comment refers to the wording of Policy P11 at the Regulation 18 Issues and Preferred Options Consultation rather than the Regulation 19 Proposed Submission document.</p> <p>The policy has been reworded and amended since the Regulation 18 document. Criterion (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>
Left blank	<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 the LPDMP.</p>
Left blank	<p>AQAPs should have a time frame. Without this monitoring can go on for many years and actions that are ineffective on their own (such as the no right turn sign into Down Lane, which is only adhered to by buses but is not policed / upheld) remain in place, buying time until technology improves which is unhelpful for the here and now and against National policy.</p>	<p>This is outside the scope of the policy. The strategy for assessing air quality and developing Air Quality Action Plans is the responsibility of Guildford Borough Council's Environment and Regulatory Services.</p>

## Policy P12: Water Quality, Waterbodies and Riparian Corridors

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	<p>We particularly agree with the changes made to and justifications provided to support Policies P12 and D11 and we support these policies.</p> <p>In respect to issues within our remit we consider the Proposed Submission Local Plan: Development Management Policies (2022) to be sound.</p>	Noted.

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Portland Capital</b>	Left blank
Policy Para 2	Criteria 2 is too vague at present and wording needs to be clear on requirements for demonstrating that opportunities to improve chemical and ecological status of a waterbody have been explored.	For proposals that contain or are in the vicinity of a waterbody is covered by the Water Environment Regulations (WER), the policy stipulates that the development should help achieve the objectives of the Thames river basin district River Basin Management Plan (RBMP). The supporting text at

		<p>4.147 states that the developers should work with the relevant catchment partnership to identify the appropriate measures. The RBMP and catchment partnership will set out measures.</p> <p>For non WER waterbodies, paragraph 4.148 sets out the need to protect and enhance aquatic habitats and their associated green corridors in order to support the recovery of the water environment. Our view is that developers will be able to set out measures to achieve this, or if not, demonstrate why they are not possible.</p> <p>Under the new BNG regime created by the Environment Act, new developments will need to submit a Biodiversity Plan, and the required information could be included in that document.</p>
<p>Policy Para 4</p>	<p>Needs to make clear that any requirement to improve and/or restore the flow of a functioning watercourse will be reviewed on a site-by-site basis and be subject to viability.</p>	<p>The policy requires development that affects a watercourse to explore opportunities to improve and/or restore the flow and functioning of the relevant watercourse. Recovery of the water environment is of such importance, both locally and nationally, that such developments that do not explore opportunities to contribute to restoring their flow and functioning should be refused.</p> <p>Exploration of opportunities is not considered to have any viability impacts. Any improvements and/or restoration works would by necessity be considered on a site-by-site basis following an exploration of opportunities in line with the policy.</p> <p>Minor modifications to paragraphs 4.147 and 4.152 are proposed to set out that measures should be</p>

		incorporated into the site to clarify that the policy is not referring to offsite measures.
Policy Para 5	<p>Needs to be revised to reflect the potential for proposals to deliver improvements to the riparian environment via a more flexible approach to the minimum buffer zone, with the 8m minimum being the starting point. Wording is suggested as follows:</p> <p>Development proposals <b>should seek to</b> retain or reinstate an undeveloped buffer zone on both sides of a main river measuring a minimum of <b>8m</b> from the top of the riverbank...</p> <p>There is no national or local 10m buffer zone requirement. As drafted, the proposed policy is not aligned with Environment Agency standard which requires a minimum 8m buffer to be provided, which relates to access requirements for a main river zone.</p> <p>In addition, there are a range of no build widths along the River Wey and it is right that there is variety along the riverside with the wider design and place-making requirements secured via other elements of the plan. In this context, any buffer should be reviewed on a site-by-site basis and in the context of existing site conditions / emerging design proposals. Consideration of quantitative factors and other benefits such as biodiversity net gain and increased public access should be a consideration in the determination of planning applications which could be undermined by the current wording / requirement.</p> <p>Additional wording to be added to Criteria 5 is suggested as follows:  <b>Any buffer zone requirement will be reviewed on a site-specific basis and considered in the context of wider quantitative benefits seeking to improve the riparian habitat.</b></p>	<p>The policy states that for ordinary watercourses, the size of the buffer needs to be appropriate and thus would be considered on a case-by-case basis. For main rivers, the buffer must be at least 10 metres.</p> <p>The Environment agency (EA) responded to the Regulation 18 Issues and Options: Preferred Options consultation (Question 22/Policy ID11) advising a new policy for watercourses which included a 10m buffer zone for main rivers (main rivers are the watercourses that fall within the EA's remit). The EA was contacted to clarify the basis for the buffer and it advised that the buffer now forms part of its standing advice and has been incorporated into other Local Plans in the Thames area.</p>
Policy para 6	Needs to be revised to include additional flexibility. As per the above there are potentially significant design implications arising from a blanket requirement for banks to be returned to a natural state.	The policy "expects" banks to be returned to a natural state, which allows for flexibility if a robust justification is presented as to why this is not feasible.

	<p>Wording should acknowledge such a requirement needs to be reviewed on a site-by-site basis and in the context of existing site conditions and emerging design proposals.</p> <p>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, taking into account their availability, suitability and <u>likely economic viability</u>.</p> <p>Policy 124 of the NPPF 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>Given the very high level of importance attached to the restoration of the water environment, both locally and nationally, this is a reasonable requirement.</p>
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	<p>Support the policy. Section 3 should include all non-residential as well as residential developments with reference to the Water resources in the South East (WRSE) plan for water conservation. <a href="https://www.wrse.org.uk/">https://www.wrse.org.uk/</a></p>	<p>Residential developments are already subject to the highest national standard of water efficiency by Policy D2(1) (d) of the LPSS, which is currently the national 'optional building regulations' water efficiency standard of 105 litres per person/per day internal water usage. National policy prohibits the development of further technical standards for new dwellings (Written Ministerial Statement of March 2015).</p> <p>Where infrastructure is essential, it is of such importance that an exemption from the requirement is warranted.</p>
Left blank	<b>Bloor Homes</b>	Left blank



Left blank	<p>Object - this policy is not positively prepared, and potentially seeks works beyond the capability of developers and applicants. Whilst being aspirational, policies should also be deliverable (NPPF, Paragraph 16). Measures should be limited to works and improvements that are within the applicant's control, as to make the policy deliverable. Suggest the following changes to the Policy to ensure it is achievable.</p> <p><i>Development proposals that contain or are in the vicinity of a waterbody <b>within the applicant's control</b> are required to demonstrate that they have explored opportunities to improve its chemical and ecological status/potential. Where a waterbody is covered by the Water Environment Regulations, proposals are required to align with the objectives of the Thames river basin district River Basin Management Plan.</i></p>	<p>The policy does not compel developers to undertake works on land outside their control and is aimed at ensuring that developers explore opportunities for onsite works to support nearby waterbodies.</p> <p>Onsite works can assist the recovery of offsite habitats. This is particularly true with waterbodies where the surrounding green infrastructure contributes to the health and functioning of the water environment greatly, and surface runoff from a site can affect the health of a nearby waterbody.</p> <p>Minor modifications are proposed to the supporting text to make this clear as follows:</p> <p>4.147 ...Development proposals that contain or are in the vicinity of a waterbody covered by the WER should work with the relevant catchment partnership to <u>identify and incorporate</u> measures that will help to deliver WER and RBMP objectives...</p> <p>4.152 ... The Environment Agency and Wey Landscape Partnership (WLP) are updating the Wey Catchment Plan and producing a Habitat Restoration Strategy for the Wey catchment which identifies actions needed to bring the River Wey into good ecological status. The RBMP also identifies beneficial projects for rivers. New development should <u>incorporate measures that</u> support the delivery of these improvements.</p>
Policy para 4	<p><i>Development proposals which contain a <b>watercourse within the application boundary</b> are required to explore opportunities to improve and/or restore the flow and functioning of <del>a watercourse</del> it.</i></p>	<p>This requirement only applies to development affecting a watercourse (i.e. where onsite measures can have an impact) so would only apply in</p>

		<p>circumstances where onsite works are capable of having an impact.</p> <p>Minor amendments are proposed to make it clear that only onsite measures are sought.</p>
Policy para 8	<p><i>Development proposals are required to identify opportunities for Natural Flood Management, creating wetland features and reconnecting rivers with their floodplain, <b>where appropriate, deliverable and assessed to be viable</b>, in order to restore natural processes, enhance biodiversity and help manage flood risk.</i></p>	<p>As above.</p> <p>The water environment is of such importance that it is not reasonable to allow harmful development on viability grounds, or to allow opportunities to restore it pass by.</p>
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	<p>Object - Request that the wording of clauses 4 to 8 are reworded to ensure that the policy is positively prepared, in line with the requirements of paragraph 35 of the NPPF. As worded, the policy is ineffective and not positively prepared. TW seek the following changes to the policy. If made, the policy will be consistent with the requirements of paragraph 35 in the NPPF and it will ensure the policy is not so restrictive it inhibits development opportunities.</p>	Left blank
Policy para 4	<p>Development proposals <del>are required</del> <u>should seek</u> to explore opportunities to improve and/or restore the flow and functioning of a watercourse.</p>	<p>Disagree - “required to explore” simply means that sufficient work must be done to look for opportunities. It does not mandate specific works. Given the importance of the water environment and as this clause only relates to development affecting a watercourse, it is reasonable to require exploratory work.</p>
Policy para 5	<p>Development proposals are required to retain or reinstate an undeveloped buffer zone on both sides of a main river measuring a minimum of 10 metres from the top of the riverbank that is</p>	<p>The policy sets an expectation for development proposals to provide an appropriate buffer for ordinary watercourses. Omission of these words</p>

	supported by a working methods statement detailing how the buffer zone will be protected during construction, and a Landscape and Ecological Management Plan detailing how it will be enhanced in the long-term. For ordinary watercourses, an appropriate buffer <del>is expected that</del> is sufficient to protect and enhance the biodiversity and amenity value of the watercourse.	would reduce clarity of the policy in setting this expectation.
Policy para 6	Development proposals that include the culverting of watercourses, hard bank revetment or which prevent future opportunities for de-culverting and naturalisation of watercourse banks will not be permitted. Development proposals <del>are expected</del> <u>should seek</u> to return banks to a natural state.	The use of the word “expect” indicates that developments should achieve the outcome, but that it may be acceptable if a robust justification for not doing so is provided. Given the importance attached to the restoration of the water environment, we think this is appropriate.
Policy para 7	Where barriers to fish movement (e.g. weirs) are present in a watercourse, proposals <del>are expected</del> <u>should seek</u> to include the removal of that barrier, or measures to allow for the natural movement of fish within the watercourse where removal is not feasible.	The use of the word “expect” indicates that developments should achieve the outcome, but that it may be acceptable if a robust justification for not doing so is provided. This would include situations where removal of a barrier is outside the applicant’s control. Given the importance attached to the restoration of the water environment, this approach is appropriate.
Policy para 8	Development proposals <del>are required</del> <u>should seek</u> to identify opportunities for Natural Flood Management, creating wetland features and reconnecting rivers with their floodplains in order to restore natural processes, enhance biodiversity and help manage flood risk.	The use of the word “required” reflects the importance attached to the restoration of the water environment. This clause applies to development affecting a watercourse so in many cases the measures will fall within the applicant’s control. Where such measures would be outside the applicant’s control the planning process provides flexibility such that they would not be sought.
Left blank	<b>Iceni Projects Ltd</b>	Left blank

<p>Policy para 5</p>	<p>Whilst we support the stated intention of the policy to protect and enhance main rivers, the Plan does not provide any justification or explanation as to why specifically a 10 metre figure has been identified as necessary to achieve this aim. We are not aware of any specific policy or guidance that refers to a need for 10 metres to be provided either side of a river.</p> <p>This proposed 10 metre buffer does not align with the terms of the Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2016. These regulations require an 8-metre buffer from the main bank of the river, stating:</p> <p>“You may need to apply for permission to do any of the following regulated flood risk activities: any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river.</p> <p>Further to this we are aware of several planning applications in Guildford Borough adjacent to the River Wey, such as Bishops Nissan of Guildford, Walnut Tree Close (LPA ref: 17/P/02469), where the Environment Agency applied an 8 metre buffer.</p> <p>Having regard to the above, we consider that a 10 metre buffer from the top of riverbank identified in policy P12 (part 5) is not justified and is not consistent with legislation. We consider that in order to ensure the policy is sound, the buffer zone set out in Policy P12 should be 8 metres.</p>	<p>The Environment agency (EA) responded to the Regulation 18 Issues and Options: Preferred Options consultation (Question 22/Policy ID11) advising a new policy for watercourses which included a 10m buffer zone for main rivers (main rivers are the watercourses that fall within the EA's remit). The EA was contacted to clarify the basis for the buffer and it advised that the buffer now forms part of its standing advice and has been incorporated into other Local Plans in the Thames area.</p>
<p>Left blank</p>	<p><b>Guildford Residents' Association</b></p>	<p>Left blank</p>
<p>Policy para 5</p>	<p>Suggested additions:</p> <p>“5) ...and a Landscape and Ecological Management Plan detailing how <u>its value, including for amenity</u>, will be enhanced in the long-term. For ordinary watercourses, an appropriate buffer is expected that is sufficient to protect and enhance the biodiversity, <u>landscape</u> and amenity value of the watercourse.”</p>	<p>A Landscape and Ecological Management Plan would typically cover a range of matters, including amenity. The main rivers in the borough are already significant open spaces and this social value would be protected and enhanced by other policies. Where</p>

	<p>The reference to landscape and ecology along main rivers is welcome. Amenity should also be mentioned being of particular importance along a main river. This should be linked to a green buffer policy as proposed and an ambition to enhance amenity access along the Wey.</p> <p>The reference to biodiversity and amenity along ordinary watercourses is welcome. Landscape should also be a consideration along ordinary water courses given the significance of soft green edges to development for the character of Guildford.</p>	<p>ordinary watercourses provide open space, they will also be subject to the same policy.</p> <p>A minor modification is proposed to add the following to the supporting text: “<u>Landscape and Ecological Management Plans for main river buffer zones should cover all areas of public realm, amenity and green infrastructure as well as ecology.</u>”</p>
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	<p>[Comment refers to Issues and Options preferred option P12]</p> <p>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.</p>	<p>The proposed submission policy no longer includes the wording referred to.</p> <p>The revised policy includes substantial requirements for development to assist in the achievement of water quality targets. Paragraph 1 states that developments that would cause deterioration of water quality or prevent its improvement will be refused. Paragraph 2 requires developments to explore opportunities to improve water quality. Paragraphs 4-8 specify enhancement measures for developments affecting watercourses.</p>
Left blank	<b>Ripley Parish Council</b>	Left blank
Policy para 5	<p>The proposal to reconsider the EA 10m buffer for ordinary watercourses is insufficient and will inevitably lead to potential damage and pollution. It is not sufficient to consider this on a case by case basis with a stated minimum standard only regarded as</p>	<p>The 10 metre buffer is based on Environment Agency standing advice and applies only to main rivers.</p> <p>The policy as a whole, along with the proposed biodiversity policies, include protections and provisions that will prevent damage to ordinary</p>

	highly desirable, as it will be all too easy for the developer to manipulate this situation to their advantage.	watercourses and promote their restoration, including through setting an appropriate buffer.
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## Policy P13: Sustainable Surface Water Management

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	<p>[Comment relates to Local Plan: Strategy and Sites Policy P4: Flooding, flood risk and groundwater protection zones]</p> <p>Our comments are below with text added in red and struck through.</p> <p>p.56, Policy P4, point 2 Development in areas at medium or high risk of <b>all sources</b> of flooding, as identified on the latest Environment Agency flood risk maps and the Council's Strategic Flood Risk Assessment.</p> <p>Point 5 All development proposals are required to demonstrate that <del>land drainage will be an adequate</del> <b>surface water drainage system is provided to meet current guidance</b> and that <del>they there</del> will <del>not result in an</del> <b>be no</b> increase in surface water run-off. Proposals should have regard to appropriate mitigation measures identified in the Guildford Surface Water Management Plan or Ash Surface Water Study.</p> <p>Paragraph 4.3.46 <b>Development should follow the surface water drainage hierarchy as set out in Part H of the Building Regulations (Approved Document H - Drainage and Waste Disposal (2015 edition)).</b> <del>Drainage systems higher in the SuDS hierarchy, as defined by NPPG, will be favoured. However, To ensure effective use over their design life course, the Council will require appropriate funding to</del></p>	<p>The Surrey County Council Lead Local Flood Authority team were consulted during the drafting stage of Policy P13 and provided comments on an early draft. The proposed changes were incorporated into the policy.</p> <p>Regarding the comment on point 5, policy P13 deals with surface water management and incorporates current SCC guidance into policy. It includes the principle that surface water runoff rates must not increase.</p> <p>Regarding the comment on Paragraph 4.3.46, Policy P13 incorporates the surface discharge hierarchy for major developments and developments in areas at risk of flooding at policy paragraph 5 and paragraph 4.180. The supporting text above the policy sets out the need for management and maintenance and this is something that is considered at the planning application stage.</p>

	implement <b>evidence of the</b> management and maintenance requirements for any proposed <b>surface water</b> drainage mechanism or other system of water management <b>system will be required</b> . Applicants should also demonstrate that they have taken into account relevant recommendations of the Guildford Surface Water Management Plan or Ash Surface Water Study.	
Left blank	<b>Environment Agency</b>	Left blank
Left blank	Support the policy.	Left blank

## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Union4 Planning</b>	Left blank
Left blank	This policy is supported, with the addition of the following wording (underlined) at the end of point 4: 'Drainage schemes are expected to avoid the use of boreholes or other deep structures for the discharge of surface water to ground, except for clean roof water <u>or where consent specifically allows</u> '.	The policy uses the word expect, which allows deviation from the policy where the applicant can justify doing so. Any existing consent may be considered as part of the planning application process including by the LLFA / EA.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	We have three GBC Local Plan allocated sites in West Horsley, two approved and the third a part site approval, awaiting the rest to come forward. We therefore consider the flooding, surface water and sewage management measures submitted by developers in depth. There is always a preference for Attenuation Ponds, yet these are at the bottom of	Policy P13 sets out a discharge hierarchy and SuDS sustainability hierarchy. Attenuation ponds fall at the top of the SuDS sustainability hierarchy as they provide three types of benefits: flood reduction (water



	<p>the SuDS hierarchy, with no pollution control or environmental benefits provided.</p> <p>We believe that this policy could be strengthened by insisting on more sustainable methods of mitigation. For example, at Site A37 in West Horsley, not one green roof has been included, although at least each home is to have a water butt!</p> <p>Strengthen the policy to ensure more sustainable mitigation methods are used to prevent surface water flooding.</p>	<p>management), pollution reduction (water quality) and wildlife/landscape benefits (biodiversity). They also provide amenity benefits.</p> <p>Green Roofs are also at the top of the hierarchy and therefore would be favoured by Policy P13.</p> <p>The discharge hierarchy favours infiltration over discharge to a waterbody and discharge to sewer. As a result, the overall benefit of green roofs and attenuation ponds will depend on where the intercepted water is eventually discharged.</p> <p>Surrey County Council also refer to the <u>Water. People. Places. Guidance document</u> which provides guidance of how SuDS (including ponds) can be designed to deliver local biodiversity aims and allow communities to derive amenity value from them. Under the proposed biodiversity policies, ponds would be expected to be designed to support biodiversity, and where they provide permanent standing water the habitat could be of high value (see paragraph 4.81 under policy P8/P9 for the importance of standing water).</p> <p>Policy P13 provides greater detail on the use of SuDS and where they are appropriate.</p>
Left blank	<b>Thames Water</b>	Left blank

Left blank	<p>With regard to surface water drainage, 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.</p> <p>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. We therefore support the supporting text at paragraph 4.182 in this respect.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>We support the drainage hierarchy in Policy P13. However, we still request that the following be included in the Policy:</p> <p>“Surface water drainage - The discharging of surface waters to the foul sewer can be a major contributor to sewer flooding and should therefore be avoided.”</p>	<p>It is noted that the request is to include this statement in policy, but our view is that the inclusion of the discharge hierarchy in policy achieves the same outcome for major developments and developments in areas of flooding because discharge to a foul or combined sewer is a last resort and only permitted with the agreement of the sewerage undertaker (see para 4.180). The supporting text at 4.182 states “Discharge to a combined sewer will not generally be acceptable...” which is commensurate with “should be avoided” . .</p> <p>For other developments (which may not be subject to LLFA review), decision makers will review the application against the guidance provided in the supporting text, by the LLFA and in the NPPG, which also favour avoiding the discharge of surface water to foul sewers.</p> <p>Paragraphs 1-3 of the policy apply to all developments and include measures to reduce surface runoff and therefore the amount of water entering the sewerage system.</p>
Left blank	<p>In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage</p>	<p>The sequential test is set out in national policy and Policy P4 of the LPSS.</p> <p>The supporting text of both Policy P4 and proposed policy P13 make reference to sewer flooding. The LPSS was subject to consultation with Thames Water to ensure that the necessary waste infrastructure will</p>

	<p>treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p>	<p>be provided to support the proposed development. Policy ID1 of the LPSS requires infrastructure to be provided when first needed.</p>
Left blank	<b>Martin Grant Homes</b>	Left blank
Left blank	<p>We understand the principle of seeking drainage schemes which intercept as much rainwater and runoff as possible. To be effective, it is important that in decision-making this is considered in the context of what it is feasible to intercept on a given site, taking account of factors such as ground conditions. We recommend that the policy is amended to reflect this.</p>	<p>Consideration of feasibility is covered by the development management process. For major developments and developments in areas of flood risk the LLFA will be consulted and it will take ground conditions into account.</p> <p>A paragraph has been added to the start of the Reasoned Justification setting out the reason for intercepting as much water as possible to provide context.</p>
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	<p>Support the policy but it should cover grey water recycling for toilet flushing.</p>	<p>Policy D12 (6) expects developments to incorporate water recycling/reuse systems where possible.</p>
Left blank	<b>Bloor Homes</b>	Left blank

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Object - this policy is unnecessary duplication and replicates much of the themes from the NPPF Paragraph 159 – 169 on drainage, flooding and SUDS.

SUDS in major developments as general practice is established by Paragraph 169 of the NPPF, including the steps that need to be followed.

Recommend deletion of this policy and the Council to continue to be guided by national guidance in this regard.

The NPPF at paragraph 160 states “Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.” Policy D13 is a strategic policy (as set out in Appendix C) and with LPSS Policy P4 fulfils NPPF requirements by managing flood risk from surface water and sewer flooding and incorporating advice from the Environment Agency and the lead local flood authority.

Additionally, NPPF paragraph 167 states “When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.” The policy includes a number of measures that cover the matters that decision makers need to consider when judging whether this requirement has been met.

Deleting Policy P13 is therefore not considered to be in line with the NPPF.

The policy expands and clarifies the NPPF provisions by incorporating local LLFA guidance into policy. Alongside flood risk management, the policy delivers on other priorities such as biodiversity enhancement

		and efficient use of land through multifunctional uses (e.g. SuDS that provide amenity value).
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	The timing of SuDS design, as set out in para 4.185, is of paramount importance. There should be a requirement within P13 to demonstrate early consideration of drainage in the design and layout of any proposal.	P13 (6) states "SuDS are required to be considered from the earliest stage of site design". Applicants will need to demonstrate that this has been the case.
Monitoring indicators	Suggest this is linked to a desired feature of all SuDS, such as proportion of schemes with long term SuDS management plans, rather than focusing on the exceptional situation of an appeal or inquiry recording an inadequate SuDS scheme as a reason for refusal.	Monitoring indicators assess the effectiveness of the LPDMP policy. Ultimately the policy will be tested through the appeal process when an inspector will consider how much weight should be given to it in determining the appeal. It is for this reason that its success at appeal, in being used as a reason for refusal in dismissing appeals, is used as the monitoring indicator for the vast majority of the policies
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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.	The policy includes the SuDS hierarchy which promotes measures that support biodiversity. Additionally, policy P12 protects water quality in waterbodies and P13 (7) sets out design criteria for SuDS that ensure runoff is subject to adequate treatment to reduce pollutants.

## Policy P14: Regionally Important Geological / Geomorphological Sites

### Prescribed bodies

None.

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	We are concerned this policy is too minimalist and takes a 'hands off approach'. For example, "Every effort" is not sufficient within Clay Chalk mix areas including Blackwell Farm and within the Gravel Clay areas of the Wey Navigation Valley.	The policy requires development proposals to make "every effort" to "prevent" and "minimise" harm. It is considered this wording is effective in protecting RIGS from potential harm associated with development proposals.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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.	This comment refers to the wording of Policy P14 at the Regulation 18 Issues and Preferred Options Consultation rather than the Regulation 19 Proposed Submission document.  The policy protects RIGS quality features that do not appear on the list, where in Criterion 1 it states "and any unmapped features that meet the definition of a RIGS".

<p>Policy para 2</p>	<p>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 must reduce harm to the conservation interests of the Regionally Important Geological/Geomorphological Site through avoidance and mitigation measures.”</p>	<p>This comment refers to the wording of Policy P14 at the Regulation 18 Issues and Preferred Options Consultation rather than the Regulation 19 Proposed Submission document.</p> <p>The policy requires development proposals to make “every effort” to “prevent” and “minimise” harm. It is considered this wording is effective in protecting RIGS from potential harm associated with development proposals.</p>
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DRAFT

## Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Union4 Planning</b>	Left blank
Left blank	The level of design should be commensurate to the nature of the development proposed, particularly where the proposals relate to a functional development.	It is not accepted that there should need to be a compromise between high quality design and the building still being functional and fit for purpose. Even functional buildings are capable of being designed in such a way that respects its context and meets the ten characteristics of well designed places where relevant. Buildings and places that function well are an important facete of high-quality design as set out within the National Design Guide
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	Policy relies on the support of various other guidance documents which need to be progressed. This includes updating the Residential Design Guide SPD and adopting the outstanding Conservation Area Appraisals.	These documents are outside the scope of the LPDMP. There is considerable design guidance contained in the National Design Guide and local guidance contained within the Residential Design Guide SPD remains relevant. In the interim, the evidence contained in the draft CAAs can still be



		used to assess planning applications on a case by case basis.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	AVRs should be discussed with Parish Councils as a statutory body.	This is outside the scope of the LPDMP. The planning application process includes clear guidance on appropriate consultation.
Left blank	<b>Guildford Greenbelt Group</b>	Left blank
Left blank	Design Codes need to be in place to support this policy, to address issues of density, character and height. These are also needed on other allocated sites, not just strategic sites.	<p>Design codes (with masterplans) for sites are intended to set design parameters and are used to inform future design and mitigate risks associated with uncertainty such as when agreeing the broader principles of how a site may be developed at outline stage (without key design elements agreed). The need for a requirement for coding is, in this context, not generally evident when dealing with housing sites that are not strategic sites, nor developed in more than one phase or by more than one developer.</p> <p>For these sites, planning applications tend to address the detailed design of the site comprehensively and at the same time. This reflects a 'full planning application' including matters that would only generally be fixed at later 'reserved matters' for outline (or hybrid) permissions. These full design aspects are reflected as part of the design and access statement for the site. The need for a further design code to control future design is then superfluous as there is little or no uncertainty between the grant of full permission and site build out. The details of the design are before the decision maker,</p>

		<p>and design parameters can be controlled including through the use of planning conditions.</p> <p>The policy does however require at D4(10): ‘A design code will be required for any other site or part of a site where it is considered necessary to set design parameters.’</p>
Left blank	<b>Portland Capital</b>	Left blank
Policy para 5 and 6	<p>Policy should go further and align with the NPPF to encourage an uplift in densities in appropriate locations by recognising minimum density ranges.</p> <p>There is no definition of how it will be determined whether increased density is ‘detrimental’ as per wording at Criteria 6.</p> <p>While the need to recognise and respond to existing character is supported, policy should include greater flexibility to allow development of higher densities to come forward in appropriate locations and not preclude appropriate innovation.</p>	<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 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 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. 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). It is not possible to define how this will be assessed as it will vary on a site by site basis.</p> <p>The policy does enable sufficient flexibility for higher densities to come forward in appropriate locations – whether a location is</p>

		appropriate will be determined by whether the higher density development would not have a detrimental impact on the character of the area. If it would then this is not an appropriate location.
Left blank	<b>Barton Willmore LLP on behalf of Martin Grant Homes</b>	Left blank
Policy para 1	<p>The characteristics of well-designed places set out in the National Design Guide should be achieved in development, to the extent to which they are relevant to a given proposal. Some characteristics may apply only to certain scales or types of development and so the requirement to demonstrate they have been achieved should be applied flexibly. The wording is therefore recommended to be amended as follows:</p> <p>Development proposals are required to demonstrate how they will achieve the ten characteristics of well-designed places as set out in the National Design Guide, <u>where applicable</u>.</p>	The Reasoned Justification acknowledges that some characteristics are more relevant than others in different proposals.
Left blank	<p>Policy D4 should acknowledge that the amount of detail in terms of design will need to be appropriate to the type of planning application. For example, national guidance identifies that an outline planning application is required only to provide information about the proposed use or uses, and the amount of development proposed for each use, to allow consideration of the application (PPG paragraph 14-034-20140306), and as such will provide a higher level of information and will not cover detailed aspects of design.</p>	<p>The level of design detail provided may need to be greater for some sites even at outline stage, this includes strategic sites. As set out in para 5.18 of the Reasoned Justification: 'For strategic sites it is likely that an overarching strategic design code would be needed which should be agreed at an early stage. More detailed phase or area Design Codes should then be prepared following a clear hierarchy of the design evolution and following the principles set by a strategic code.'</p>

Left blank	Paragraph 130 of the NPPF sets out that developments should be 'sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)'. To be consistent with this, Policy D4 should allow for development which may be intentionally trying to create a new character through the use of higher densities, subject to this not having a significant adverse impact on the surrounding area.	This is considered to be covered by Draft Policy D4(6) which states: 'Development proposals are expected to make efficient use of land and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting.'
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Policy para 2	Should also make reference to Neighbourhood Plans, especially where local distinctiveness is recorded within the Neighbourhood Plan.	The policy states that development proposals must have regard to relevant national and local design guidance or codes. The supporting text clarifies that this includes neighbourhood plans (see para 5.7).
Left blank	Master plans and design codes should be agreed and signed off by local interest groups such as Community associations, Neighbourhood forums and Parish Councils.	This is the role of the Local Planning Authority however consultation with local residents and other stakeholders forms part of the planning application process.
Left blank	<b>Savills Planning on behalf of St Edward Homes Ltd</b>	Left blank
Left blank	Policy is ineffective and not positively prepared. Policy D4 repeats design guidance which is already available and a material considerations in the LPSS, various Supplementary Planning Documents and national guidance. The policy repeats guidance in the National Design Guide and so GBC should justify this repetition and duplication, otherwise it is inconsistent with paragraph 16e) of the NPPF which seeks to avoid unnecessary duplication.	It is considered that the policies in the emerging LPDMP provide additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker.

Policy para 6	<p>In accordance with the Paragraphs 124 and 125 of the NPPF the following amendments for Policy D4 are suggested, in the event the policy is retained:</p> <p>6) Development proposals are expected to make efficient use of land and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting. <u>In town centres higher densities shall be supported.</u></p>	<p>The policy supports increased densities in appropriate locations. It is not considered appropriate to apply blanket support to higher densities in Guildford town centre as its topography, significant heritage assets and important key views mean that not all parts of the town centre are considered appropriate to accommodate high density development /tall buildings.</p>
Left blank	<b>Savills Planning on behalf of Bloor Homes</b>	Left blank
Left blank	<p>Policy D4 repeats design guidance which is already available and are material considerations in the LPSS, various Supplementary Planning Documents and national guidance. The policy repeats guidance in the National Design Guide and so GBC should justify this repetition and duplication, otherwise it is inconsistent with paragraph 16e) of the NPPF which seeks to avoid unnecessary duplication.</p>	<p>It is considered that the policies in the emerging LPDMP provide additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker.</p>
Left blank	<b>DP9</b>	Left blank
Left blank	<p>Further flexibility on the approach to density should be applied in town centre locations, particularly when a site is located in a highly accessible location which offers the opportunity to deliver an increased number of homes.</p>	<p>The policy supports increased densities in appropriate locations. It is not considered appropriate to apply blanket support to higher densities in Guildford town centre as its topography, significant heritage assets and important key views mean that not all parts of the town centre are considered appropriate to accommodate high density development /tall buildings.</p>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank

Para 5.9	The supporting text for Accurate Visual Representations (AVRs) should state that these must include normal human visual field of view, i.e. approx. 45deg cone of vision, or as a normal camera view; all major proposals must include these. Where wide angle views are used to give an impression of the whole building these must carry a warning that they will not be seen as such in reality.	This level of detail and prescriptiveness is not appropriate in the LPDMP.
Left blank	The plan should contain density limits which vary depending on their location/designation	Policy D4 requires 'appropriate residential densities' that are demonstrated to result from a design-led 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.
Left blank	<b>Savills on behalf of Taylor Wimpey</b>	Left blank
Left blank	Question the need for another policy to address the same issues as LPSS Policy D1 and the Strategic Development Framework (SDF) Supplementary Planning Document (SPD) and for this reason consider this policy should not be applicable to strategic sites. <b>Strategic sites will be assessed against the approved Strategic Design Codes.</b> It has the potential to contradict other planning policy, can become a hindrance that impacts negatively on design as opposed to assists.	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 further detailed guidance and site specific design principles. Reference to the SDF SPD is included in the supporting text.

Policy para 6	<p>Request the following amendment is made to the policy in order to ensure the policy can be considered positively prepared, in line with the NPPF:</p> <p><i>“6) Development proposals are expected to make efficient use of land and increased densities may be appropriate, <u>particularly on strategic sites</u>, if it would not have a detrimental impact on an area’s prevailing character and setting.”</i></p>	<p>The extent to which higher densities are appropriate across certain sites or parts of sites will need to be considered on a case by case as it will depend on its context and the impact that this has on the character of an area. The policy is sufficiently positively worded to enable higher densities where these are shown to be appropriate. Additionally, the Strategic Development Framework SPD provides some guidance regarding indicative densities across the strategic sites.</p>
Left blank	<b>CBRE</b>	Left blank
Left blank	<p>Draft Policy D4 (7) notes that development proposals are expected to be designed so as not to hinder the potential future delivery of adjoining development sites. In the case of the Strategic Sites, it is considered that this should be strengthened in policy to be a required to ensure the effective delivery of multiphase, multi ownership developments.</p>	<p>LPSS Policy D1 requires masterplans for strategic sites to be prepared and agreed with the LPA. Furthermore, draft Policy D4(9) states: ‘Masterplans and Design Codes will also be required for any site that will be developed in more than one phase or by more than one developer. Failure to agree a Design Code approach is likely to result in the refusal of an application.’</p> <p>It is therefore considered that there is sufficient policy to ensure that sites are planned for and delivered in a comprehensive manner.</p>
Left blank	<b>Guildford Society</b>	Left blank
Policy para 2	<p>Should contain more explicit guidance by reference to what constitutes good design using examples of good and bad. This could include referring to Design Guides/Codes and SPD’s whether in place or in plan.</p>	<p>This is done in the supporting text at para 5.7.</p>

Policy para 3	For clarity purposes the issues listed in policy para 3 should be bulleted and the final sentence made into its own para.	Agreed. This does not change the wording or intent of the policy and is therefore proposed as a minor modification to the LPDMP.
Left blank	The Accurate Visual Representation text in para 5.9 in the Reasoned Justification should be included in the Policy itself.	Policy para 3 requires development proposals to respond positively to their context including significant views to and from the site. The use of AVRs is a means of demonstrating this requirement rather than being a policy requirement itself against which a proposal is assessed. It is therefore not policy but could be a validation requirement of information that needs to be submitted alongside a planning application once the LPDMP is adopted.
Left blank	Policy D4 should be positioned to accommodate new SPD's or Area Action Plans etc coming forward as a result of the Town Centre Master planning exercise now underway. Suggest following additional policy:  <u>12) Work is underway on the production of a Town Centre Masterplan this may result in supplementary policies that will have to be adhered too when designing new developments.</u>	Draft Policy D4(2) already provides a policy hook that would apply to any new SPDs that might be produced after adoption of the LPDMP. If an Area Action Plan is produced then this will contain its own policies and have the same status as the local plan as it would form part of the development plan.
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	Definition wording in para 5.15 "lower densities in more sensitive parts such as on the edge of the settlement [are required] to form a more sympathetic transition between the built up area of the new site and the surrounding countryside [and existing built form]" should be added to the list of points for the policy.	The policy already captures the issue of transitioning and changing character by requiring appropriate densities that respond to the context and local character of the area.



Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	Should include variety of design, particularly on large developments to avoid a repetition of old style housing estates where many houses looked the same.	One of the ten characteristics of well designed places as set out in policy para 1 and the National Design Guide (NDG) is identity. This ensures that places are attractive and distinctive. The NDG states that larger scale development sites may benefit from different character areas.
Left blank	Maximum building heights should be established for urban and rural areas. Without a policy specifying building heights, developers will be able to submit applications for tall tower blocks, which change the character of the town centre. Even if these applications are rejected by the Council, they could be pushed through on appeal. There should be no buildings above three stories in the setting of the AONB or in other sensitive areas.	Draft Policy D4 states that 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. Setting of height limits is not considered appropriate as it will vary depending on a site's location and context.
Left blank	Reflective materials/colours should be avoided in areas which are overlooked from the AONB. Adequate screening should be a requirement for any development overlooked from any part of the AONB.	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. LPSS Policy P1 states that 'The Surrey Hills Area of Outstanding Natural Beauty (AONB), as shown on the Policies Map, will be conserved and enhanced to maximise its special landscape qualities and scenic beauty.'
Left blank	The character of development – 'new development will be required to respond to the Guildford Town Centre Views SPD' – 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).
Left blank	Would like to see vernacular design encouraged in traditional Surrey/village settings and in areas which form	The policy requires high quality design which contributes to local distinctiveness by demonstrating a clear understanding

	the setting to the Surrey Hills AONB and a greater emphasis on energy efficient design	of, and responding positively to, issues such as surrounding context and prevailing character. The supporting text refers to vernacular design.
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	<p>Policy should address:</p> <ol style="list-style-type: none"> <li>1. Height – impact on views, townscape, landscape &amp; environment incl context of narrow roads. Criteria driven policy with clear expectations and limits. Solum not a precedent – era when no housing supply in a Plan.</li> <li>2. Bulk and massing – in relation to distinctive downland landscape setting</li> <li>3. Rise and fall of land - reflected in form of built environment. Views, distinctive, eg North Street, if tall buildings at bottom of slopes create roof top plateau and disguise landform</li> <li>4. Green character – including space for mature planting within plots, effective screening to achieve soft green edges to settlements, green corridors along routes into settlements</li> <li>5. Density - footprint allows space between buildings consistent with valued characteristics of town centre, garden suburbs and villages, including space for greenery</li> <li>6. Views - importance of views in and out</li> </ol>	<p>The policy requires that 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, landscape and topography.</p>
Left blank	<b>National Grid</b>	Left blank
Left blank	Utilities Design Guidance	A policy relating to this matter is considered unnecessary as this level of detail is more appropriate to be assessed on a

	<p>The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure.</p> <p>National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets.</p> <p>Therefore, to ensure that Design Policy D4 is consistent with national policy we would request the inclusion of a policy strand such as:</p> <p><u><a href="#">“x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”</a></u></p>	<p>site by site approach and using general good design principles that are expected for all development proposals. Additionally the National Grid would be able to comment on specific applications where this is considered to be an issue.</p>
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	The Council should prepare a Building Heights Strategy for the borough - treating the different areas on a zonal basis.	The Council has an adopted Guildford Town Centre Views SPD. This identifies key views that need to be protected. Any

	<p>The agreed strategy would be implemented by means of an SPD providing guidance on building height, that would be referenced in Policy D4.</p>	<p>development proposals that unacceptably harm these views will be refused. Draft Policy D4 requires that proposals respond positively to their context and specifically that consideration is given to the form and scale of buildings including their height. Each application will need to be considered on its own merits and in relation to their immediate context which can vary across even small areas.</p>
Left blank	<p>Reg 18 Policy H4 has been deleted and wording inserted in Policy D4, but more perspective guidance on min/max density for village sites would help prevent urbanisation and over intensification of development sites in villages.</p>	<p>Policy H4 has now been replaced by Policy D4 which requires 'appropriate residential densities' that are demonstrated to result from a design-led 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.</p>
Left blank	<p>Wording in para 5.15 "lower densities in more sensitive parts such as on the edge of the settlement [are required] to form a more sympathetic transition between the built-up area of the new site and the surrounding countryside [and existing built form]" be added to the list of points for the policy.</p>	<p>The policy already captures the issue of transitioning and changing character by requiring appropriate densities that respond to the context and local character of the area.</p>

## Policy D5: Protection of Amenity and Provision of Amenity Space

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Union4 Planning</b>	Left blank
Left blank	Protection of amenity can be secured through the imposition of appropriately worded conditions, attached to planning consents, setting, for example, noise limits and hours of operation. Such limits should however be reasonable and not to the detriment of the operation of the development, particular where it is located on an existing developed site.	The NPPF and Planning Practice Guidance sets out the tests that any proposed planning conditions must satisfy. The policy can provide the basis for justifying the use of any conditions that are considered appropriate.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	The policy needs to state that boundary treatments must be sustainable and give consideration to predominant types of boundary treatments within the local landscape setting.	This issue is covered by other policies. Draft Policy D4 requires development proposals to respond positively to local character and the landscape setting. Draft Policy P6/P7 requires development proposals to maximise biodiversity gain and that built features, including curtilages, should be permeable for wildlife.

Left blank	<b>Barton Willmore LLP on behalf of Martin Grant Homes</b>	Left blank
Left blank	<p>Amenity provision should be informed by the location, nature and size of a development. This is vital to ensure that usable and attractive open space is provided. For example, in some circumstances it may be appropriate to provide an attractive communal garden rather than balconies which may not be attractive to use due to noise from neighbouring uses or the orientation of the building. Paragraph 5.30 acknowledges that this may be case. Against this background, we recommend that the policy should set out that 'new build residential development proposals are expected to provide access to private or communal outdoor amenity space, where appropriate'.</p>	<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 lists the key considerations necessary to ensuring that any type of amenity space provided is well-designed and fit for purpose.</p>
Left blank	<p>Recommend the design of balconies, gardens and communal open spaces is considered on a case by case basis. We agree that, as set out in paragraphs 5.31-32 of the supporting text, outdoor space should be designed to maximise its usage and functionality and that balconies should form an attractive part of a building. However, to ensure this can be achieved, policy should avoid imposing an unjustified space requirement. We would therefore suggest that, if considered necessary, guidance on balcony size is provided within the supporting text.</p>	<p>The policy does not prescribe a minimum garden size as it is considered the qualitative standards are better at ensuring they are fit for purpose. However, in relation to balconies, there is a direct relationship between the balcony's size and its amenity value. The size of 4sqm is considered to be the smallest size that would still enable the balcony to provide a valuable and multi-functional form of amenity space.</p>
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	<p>Protection of amenity and provision of amenity space should include stated minimums with due reference to national standards and should be minimum usable space</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 are imperative in</p>

	<p>not overall external dimensions. The pandemic has taught us the value of private amenity space.</p>	<p>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. However, it is acknowledged that further guidance and standards may be forthcoming, particularly at a local or neighbourhood scale. In this regard, the policy notes that development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential separation distances.</p>
Left blank	<p><b>Savills Planning on behalf of St Edward Homes Ltd</b></p>	Left blank
Left blank	<p>Policy is ineffective. Support the objective of Policy D5, however the policy should be flexible to ensure developments in urban environments can be delivered using the best use of land despite any constraints.</p> <p>Suggest that the wording of this policy includes flexibility, particularly where this is already sufficient public amenity space nearby or where public realm improvements are proposed by a development.</p> <p>“2) All new build residential development proposals, including flatted development, <del>are expected</del> <u>should aim</u> to have direct access to an area of private outdoor amenity space, <u>where appropriate.</u> <del>When</del> <u>When</u> providing appropriate outdoor amenity space, both private and shared, development proposals are required to:</p> <p>a) <del>take into account</del> <u>consider where possible</u> the orientation of the amenity space in relation to the sun at different times of the year”.</p>	<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 lists the key considerations necessary to ensuring that any type of amenity space provided is well-designed and fit for purpose. The policy as drafted uses the term ‘expected’. It is not therefore a requirement however the applicant will need to demonstrate why the provision of private amenity space is not appropriate/feasible. This is considered justified given the valuable role of this form of space. The extent to which public amenity space can be considered as a substitute for private or shared amenity space will need to be considered on a case by case basis. The role and function of public amenity green space differs significantly with that of amenity space. For this reason there will need to be robust justification given as to</p>

		<p>why the provision of no amenity space should be considered appropriate.</p> <p>Do not consider that there is a practical differences between the terms 'take into account' and 'consider where possible'.</p>
Left blank	<b>Savills Planning on behalf of Bloor Homes</b>	Left blank
Policy para 2	<p>The requirement to have direct access to an area of private outdoor amenity space is not considered to be an absolute requirement to ensure amenity in developments, particularly for apartments. Residents of apartments which are sited close to public open space, new play areas or other landscaped areas would have access to these areas and so a requirement for a private / community area relating to the apartment block in every case is unnecessary.</p> <p>The policy does not define what a private outdoor amenity space is in terms of whether it means private per apartment, or private / communal relating to the apartment block (it is also taken to mean something other than a balcony). Either way if there is public open space proposed or existing in the vicinity of the apartment block the value to residents of outdoor amenity space associated to the apartment block only would be minimal in this respect.</p>	<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 lists the key considerations necessary to ensuring that any type of amenity space provided is well-designed and fit for purpose. The extent to which public amenity space can be considered as a substitute for private or shared amenity space will need to be considered on a case by case basis. The role and function of public amenity green space differs significantly with that of amenity space. For this reason there will need to be robust justification given as to why the provision of no amenity space should be considered appropriate.</p> <p>The definitions section defines amenity space as the outside space associated with a home. This would therefore include balconies. Private amenity space is private to that household whereas shared would be that which can also be accessed by other households in that development.</p>



Policy para 3	<p>The requirement for balconies to be designed as an integrated part of the overall design is not defined. The supporting text refers to bolt on type balconies being unattractive, however this is a subjective statement, and the policy should not be prescriptive as to stifle innovation and good design. In some contexts such balconies might be appropriate and deliver a meaningful private amenity space in an efficient manner. This should be a matter relating to the design quality of developments as a whole, rather than being precluded in a specific policy. Policy para 3(a) should be deleted.</p>	<p>The supporting text states that balconies should be multi-functional, long lasting and form an attractive part of the scheme. Bolt on structures do not tend to meet these design requirements however each will be assessed on its merits. Any proposals that include balconies should show how they intend to incorporate balconies early on in the design process.</p>
Left blank	<p><b>Holy Trinity Amenity Group</b></p>	Left blank
Left blank	<p>The policy should include the following requirements:</p> <ol style="list-style-type: none"> <li>1. Ridge heights of buildings not to exceed those of neighbouring properties except to reflect changes in the natural land levels.</li> <li>2. No clear side windows to any habitable room.</li> <li>3. Screens to rear balconies to prevent direct sideways views from them.</li> <li>4. Loss of light to rear gardens to be quantified, e.g loss not to exceed 30 percent of that available if the building did not exist.</li> <li>5. All dwellings that are not flats to have at least 6sqm of open surfaced amenity space, to provide for bicycle storage, bin storage, and natural drying of washing, and also at least 6sqm of natural green space.</li> </ol>	<p>Draft Policy D4(4) requires that development proposals have regard to building patterns, rhythms and lines. Draft Policy D9(3) requires frontage infill proposals to have regard to the existing form and scale of buildings including height.</p> <p>Draft Policy D5 already requires no unacceptable impact on the living conditions in terms of privacy and overlooking, and access to sunlight and daylight. This will need to be assessed on a case by case basis.</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 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</p>

		<p>considered that quantitative standards deliver a desired outcome then these have been set out in policy e.g. minimum space standards and balcony size. However, it is acknowledged that further guidance and standards may be forthcoming, particularly at a local or neighbourhood scale. In this regard, the policy notes that development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential separation distances.</p>
Left blank	<b>Savills on behalf of Taylor Wimpey</b>	Left blank
Left blank	<p>It is important that amenity space 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. As worded, the policy could be clearer in respect of a holistic approach to sites, notably larger scale and strategic sites. It is therefore ineffective and unjustified.</p>	<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 lists the key considerations necessary to ensuring that any type of amenity space provided is well-designed and fit for purpose. The extent to which public amenity space can be considered as a substitute for private or shared amenity space will need to be considered on a case by case basis. The role and function of public amenity green space differs significantly with that of amenity space. For this reason there will need to be robust justification given as to why the provision of no amenity space should be considered appropriate.</p>
Left blank	<b>Guildford Society</b>	Left blank

<p>Policy para 1</p>	<p>Unacceptable impact applies to other types of neighbouring properties e.g. Health Centre. Propose that Workplaces needed to be included particularly with Working From Home or in small local shared spaces becoming more prevalent.</p> <p>Propose the following amendment:</p> <p>1) Development proposals are required to avoid having an unacceptable impact on the living <b>or working</b> environment of existing residential properties <b>and in some case workplaces</b> or resulting in unacceptable living conditions for new residential properties, in terms of:</p>	<p>The policy applies to all residential properties so, in protecting a property's living environment, it would also protect the amenity of people that might be working from home as well.</p>
<p>Policy para 2</p>	<p>Although it cannot always be provided all residential developments should provide dual aspects.</p> <p>Propose the following additional requirement:</p> <p><b><u>d) To increase amenity designs should consider providing dual aspects wherever possible.</u></b></p>	<p>This policy is concerned with external amenity space and the protection of amenity only (not visual amenity)</p>
<p>Left blank</p>	<p><b>Compton Parish Council</b></p>	<p>Left blank</p>
<p>Left blank</p>	<p>Protection of amenity should apply during the building phase as well as after and this must include traffic volume, routes and working times.</p>	<p>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.</p>

## Policy D5a: External Servicing Features and Stores

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Savills Planning on behalf of Bloor Homes</b>	Left blank
Policy para 1	<p>This policy requires bin storage, cycle storage and electric vehicle charging points to be integrated into the built form of the proposals. It is not clear what this means and whether it would preclude the use of outbuildings and sheds for those purposes.</p> <p>Good design requires innovation and flexibility to respond to characteristics and constraints of various development sites. In terms of electric vehicle charging points, it may not be practically possible to integrate them in the built form of development, particularly where the associated parking space is remote from the building (such as terrace housing with shared parking areas). As this is a relatively new technology, the policy should not be restrictive as it can hinder innovation and other solutions. The policy should</p>	<p>It is not intended to preclude the provision within standalone outbuildings and sheds. The reasoned justification states, at para 5.36, that cycle parking should “provided through an enclosed and lockable shelter, store or compound.” This could be an outbuilding or shed, provided it meets the dimensions set out in the Parking SPD.</p> <p>Reference to ‘integrated into built form’ is not intended to mean that it must be connected to the main building. It is intended to mean that these features have been carefully considered as part of the design process from the outset and that their design and location is integrated within the scheme as a whole to fulfil their practical needs.</p>

	<p>remove the requirement for these items to be integrated into the built form.</p> <p>The policy should be amended to:</p> <p><i>Development proposals are required to demonstrate that:</i></p> <p><i>a) bin storage, cycle parking and electric vehicle charging points, whilst being designed to meet practical needs, <b>are integrated into the built form and</b> should not detract from the overall design of the scheme or the surrounding area</i></p>	
Left blank	<b>Savills on behalf of Taylor Wimpey</b>	Left blank
Policy para 1	<p>part 1a of this policy implies built in bin and cycle storage is required. This would be particularly challenging in regard to bin storage, as storage requirements and bin sizes change regularly. Suggested change:</p> <p>“1) Development proposals are required to demonstrate that:</p> <p>a) bin storage, cycle parking and electric vehicle charging points, whilst being designed to meet practical needs, are integrated into the <b>built form plot layout</b> and do not detract from the overall design of the scheme or the surrounding area”.</p>	<p>It is not intended to preclude the provision within standalone outbuildings and sheds. The reasoned justification states, at para 5.36, that cycle parking should “provided through an enclosed and lockable shelter, store or compound.” This could be an outbuilding or shed, provided it meets the dimensions set out in the Parking SPD.</p> <p>Reference to ‘integrated into built form’ is not intended to mean that it must be connected to the main building. It is intended to mean that these features have been carefully considered as part of the design process from the outset and that their design and location is integrated within the scheme as a whole to fulfil their practical needs.</p>
Left blank	<b>Guildford Society</b>	Left blank

<p>Policy para 1</p>	<p>Suggested amendment:</p> <p>1) Development proposals are required to demonstrate that:</p> <p>a) bin storage, cycle parking, <b><u>delivery set down lockers</u></b>, and electric vehicle charging points, whilst being designed to meet practical, <b><u>including easy access</u></b>, needs, are integrated into the built form and do not detract from the overall design of the scheme or the surrounding area</p>	<p>There is already a draft policy (Policy D8(3)(b)) for development proposals to consider the provision of mobility hubs in appropriate locations, which can include package delivery lockers as per the definition at para 5.77.</p> <p>The policy requires that these are designed to meet practical needs – easy access would be included within this consideration.</p>
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## Policy D6: Shopfront Design and Security

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	Suggests that GBC explores the option for avoiding vibrant colours on the High Street altogether, and instead opting only for neutral tones, which are more in keeping with a historic town centre.	This policy must be applicable to all types of shopfronts across the borough, not just those in the High Street, therefore it has to have a slight degree of flexibility. Nevertheless, it is considered that the suggestion being made is able to be managed by draft policy para 1 as this stipulates that <i>“Shopfronts are required to be designed to a high quality, including being responsive to, and where possible enhancing the character and appearance of their surrounding context and the building it forms part of...”</i> . The policy adds further strength by going on to say that <i>“development proposals are also required to contribute to the continued preservation or enhancement of the Borough’s heritage assets...”</i>
Left blank	<b>Guildford Society</b>	Left blank
Left blank	Policy should refer to the GBC Guidance on Shopfront Design and Security in Historic areas.	Not making specific reference to the SPD in the LPDMP does not preclude an SPD being produced nor lessen the weight

		that can be applied to it. Nevertheless, draft policy D6(1) does state that shop front design should be informed by national and local design guidance, and this will include current and future SPD's.
Left blank	<b>Guildford Residents Association</b>	Left blank
Policy para 2	<p>The retention of architectural details and features of interest contributes positively to the character and appearance of Guildford.</p> <p>In para 2) insert:</p> <p>2) All new and alterations to shopfronts are expected to use high quality sustainable materials and to be of a design <u>and colour</u> that retains, or relates well to the proportion, scale, detailing, period and character of the host building as a whole, as well as the wider street scene.</p>	<p>The National Design Guide sets out seven components required for good design, one of those stated relates to appearance, in which colour is covered – para 28 <a href="https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/671116/national-design-guide.pdf">National design guide.pdf (publishing.service.gov.uk)</a></p> <p>Therefore, the suggested amendment is considered to not be necessary.</p>
Left blank	<p>Explanatory text should be clear that perspex and similar fascia strips that obscure the architectural features or have a negative impact on the proportions of a building will be resisted.</p>	<p>This is considered to be covered by paragraph 5.48 which states clearly that “<i>any new works undertaken should not conceal or remove traditional detailing</i>”.</p>
RJ para 5.49	<p>Care should be taken to ensure this policy also relates well to modern purpose-built retail units, including for example along Ladymead, and ensures high level as well as overly deep fascia strips can be avoided. 5.49 should read “Oversized fascias which extend <u>or are positioned</u> above</p>	<p>As the comment mentions this policy must be applicable to all types of shopfront, including modern purpose-built retail units, which typically have large fascia strips or fascia mounts at a higher level than traditional retail units. The suggested inclusion of “positioning” into para 5.49 would prejudice these types of units, and therefore cannot be agreed to.</p>



	<p>the ground floor or obscure architectural features of value will not be supported...”</p>	<p>Nevertheless, there is confidence that draft policy D6(1) can be used to manage those situations where the positioning of signage above ground floor would be a concern as it sets out the following, <i>“Shopfronts are required to be designed to a high quality, including being responsive to, and where possible enhancing the character and appearance of their surrounding context and the building it forms part of...”</i>. The policy adds further strength by going on to say that <i>“development proposals are also required to contribute to the continued preservation or enhancement of the Borough’s heritage assets...”</i></p>
Left blank	<p><b>Holy Trinity Amenity Group</b></p>	Left blank
Left blank	<p>While we would agree with most of the aspirations, they are of no policy value unless there is a means of enforcing them.</p> <p>We ask that, within conservation areas (and not just for listed buildings) a planning application be required for all new shopfronts and changes to existing ones. If necessary deemed consent should be removed if this is in conflict with this control.</p>	<p>Amendments to permitted development is beyond the scope of the LPDMP.</p>
Left blank	<p><b>Barton Willmore and behalf of Martin Grant Homes</b></p>	Left blank
Left blank	<p>Martin Grant Homes supports the proposed policy approach in principle. However, it is not justified that shopfronts are expected to present an active frontage to the street scene ‘at all times’. This requirement is excessive as some shops may require shutters for security reasons when closed and</p>	<p>There is recognition of the importance of security for business premises, however this should not be to the detriment of the appearance of the host building or the amenity of the streetscape. There are various effective yet relatively unobtrusive security measures that can be used as an alternative to security shutters. Nevertheless, if security</p>

	<p>therefore will not have an active frontage. We therefore recommend the below wording as follows:</p> <p><u>'Shopfronts are expected to present an active frontage to the street scene during opening hours at all times and ensure access for all.'</u></p>	<p>shutters are considered necessary then these can equally be accommodated internally thus still allowing active frontages as well as natural surveillance.</p>
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	<p>We support this policy but, for the avoidance of doubt, request that 'shop front' is redefined such that corner shops include both front and side elevations visible in the street scene.</p>	<p>This request is not considered to be necessary. The definition is considered to be accurate and applicable to corner units, by virtue of the opening part of the definition "a street-level frontage with a display window".</p>

## Policy D7: Advertisements, Hanging Signs and Illumination

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	This policy should contain specific direction about signs in Conservation Areas, as in para 5.69	This is considered to be covered by draft policy D7(6) which states that “ <i>development proposals affecting heritage assets and their setting will be required to preserve or enhance and were appropriate better reveal their architectural and/or historical significance</i> ”
Left blank	<b>British Sign and Graphics Association</b>	Left blank
RJ paras 5.57, 5.59, 5.65, 5.68, 5.69,	<p>The changes since the Issues and Options version are refreshingly thoughtful and a significant improvement on the wholly negative sentiments of the earlier version. The British Sign and Graphics Association are glad to be able to support Policy D7 and supporting text. Suggest minor improvements to make the document more readable:</p> <ul style="list-style-type: none"> <li>In para 5.57, "Outdoor advertising is a very...." would read better ("has become" implies something recent -</li> </ul>	<p>The following minor mods are suggested as means of addressing some of the typo comments made to improve clarity.</p> <ul style="list-style-type: none"> <li>RJ para 5.57 “Advertisements <del>s are</del> <del>has become</del> a very important and significant part of the built environment”</li> </ul>

<p>5.70, &amp; 5.72</p>	<p>advertising has been important since ancient times - even the Sumerians used it!).</p> <ul style="list-style-type: none"> <li>• In 5.59, "this policy only applies to advertisements" (plural).</li> <li>• Para 5.65 "cumulative" and "accrual" mean the same thing - perhaps "cumulative impact".</li> <li>• Para 5.68 "statutory" should be "statutorily".</li> <li>• Para 5.69 final sentence "advertisements" needs an apostrophe.</li> <li>• Para 5.70 "advertisement" and "signage" are the same thing. Simply "Where an advertisement is to be fixed to a statutorily listed building ..." (for clarity - it does not apply to locally listed buildings).</li> <li>• Para 5.72 "is hidden from view" might be replaced with "is concealed as far as reasonably practical" - complete concealment might not be possible (ie a cable affixed to a concrete wall).</li> </ul>	<ul style="list-style-type: none"> <li>• RJ para 5.69 "the <u>advertisement's advertisements</u> acceptability will be guided by the published character appraisal of that area."</li> <li>• RJ para 5.70 "Where <u>advertisement or</u> signage is to be fixed to a <u>statutory</u> listed building Listed Building Consent will be required, irrespective of whether or not Advertisement Consent is required."</li> <li>• RJ para 5.72 "Care should also be taken to ensure that the wiring or cabling required to serve the illumination is <u>concealed as far as practical</u> <del>hidden from view</del> and does not harm or impede on architectural features and detailing"</li> </ul> <p>With regards to the typo comments made concerning RJ paragraphs 5.59, 5.65 and 5.68, given the context of the document these are not considered to be typos.</p>
<p>RJ para's 5.71 &amp; 5.72</p>	<p>In paragraph 5.71 "reasonably required" should be deleted - it is meaningless. Who is to decide what is "reasonably required". This is the applicant's business and not for the Council to determine. If the applicant think it is needed, then it is not for the Council to question (as advised in PPG paragraph ID 18b-027-20140306). Consequently, in para 5.72 "Where illumination is considered to be acceptable" must also be deleted.</p>	<p>'Reasonably required' is terminology that is used frequently within the regulations - <u>The Town and Country Planning (Control of Advertisements) (England) Regulations 2007</u> (<a href="http://legislation.gov.uk">legislation.gov.uk</a>)</p> <p>With regards to the request to amend para 5.72, this is also not accepted. There are, and will be, occurrences where illumination will not be deemed acceptable in terms of amenity and/or public safety or in instances where harm to a heritage asset is identified.</p>

Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	Within conservation areas, and not just for listed buildings, a planning application be required for all new shopfronts / advertisements and changes to existing ones. We believe that this was the practice in the past; the SPG on this subject makes no reference to its application being limited to listed buildings. Recent advertising changes in the High Street clearly degrade the Conservation Area status	Amendments to permitted development is beyond the scope of the LPDMP
Left blank	Advertising A boards on public space be prohibited from the Town Centre Conservation Area. These are unnecessary and outmoded and create clutter and trip hazards for pedestrians	Regulation of 'A board' advertising is likely to be difficult due to the complex rules around outdoor advertisement and signage as there are likely to be instances where the advertisement is either excluded from the planning authority's direct control or it has 'deemed consent' due to being located on land which is not identified as public highway. Equally, there may be cases where they are located within the public highway, thus can be regulated. Guidance on the specifics of this can be found through the following link - <a href="http://www.gov.uk/government/guidance/outdoor-advertisements-and-signs-a-guide-for-advertisers">Outdoor advertisements and signs: a guide for advertisers - GOV.UK (www.gov.uk)</a>
Left blank	If necessary deemed consent should be removed if this is in conflict with regulation, and an Advertisement Control area designated.	This is beyond the scope of the LPDMP
Left blank	Illuminated signs to be not allowed in Conservation Areas, except for businesses whose main trade is after dark.	The policy makes clear the following <ul style="list-style-type: none"> <li>that illuminated advertisement must not have a detrimental impact on the amenity of adjoining properties and wildlife habitats</li> </ul>

		<ul style="list-style-type: none"> <li>• that proposals will only be supported where there is no detriment to amenity by reason of method &amp; degree of illumination/luminance (amongst other things)</li> <li>• designs are responsive to, or enhance the appearance, character and vitality of an area by having regard to level &amp; method of illumination (amongst other things)</li> <li>• 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</li> </ul> <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>
Left blank	The increasing use of shopfronts in Conservation Areas as advertising hoardings needs to be more rigorously controlled.	Control of the use of shopfronts as advertising hoardings is difficult due to the complex rules around outdoor advertisement and signage as there are many instances where the advertisement is either excluded from the planning authority's direct control or it has 'deemed consent'. Guidance on this can be found through the following link - <a href="http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/362222/Outdoor_advertisements_and_signs_a_guide_for_advertisers.pdf">Outdoor advertisements and signs: a guide for advertisers - GOV.UK (www.gov.uk)</a>
Left blank	<b>Guildford Society</b>	Left blank
Left blank	The policy needs to allow for refusal of consent on the grounds of proliferation.	This is considered to be covered by policy para 1(h), which states that <i>"Development proposals for advertisement and signage are required to demonstrate that there is no harm to amenity or public safety by reason of cumulative clutter"</i>

Left blank	<p>We note that compared with the withdrawn policies 2003 Policies G8 and G9 the proposals are considerably stronger but are considerably weaker than the GBC Design Guidance for Advertisement and Signs. At the least, the new Policy should make affirmative reference to the Guidance.</p>	<p>Not making specific reference to the SPD in the LPDMP does not preclude an SPD being produced nor lessen the weight that can be applied to it. Nevertheless, draft policy D6(2) does state that shop front design should be informed by national and local design guidance, and this will include current and future SPD's.</p>
Left blank	<p>The society would like to see a presumption against moving image, television screen type advertisements/ 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 blanket prevent the use of the mediums suggested, as there may be some situations where they could be acceptable. Therefore, such a suggestion runs the risk of overstepping the regulations.</p> <p>Notwithstanding the above, the draft policy makes clear the following</p> <ul style="list-style-type: none"> <li>• that advertisement and signage are expected to be responsive to and enhance the appearance, character and vitality of an area, by having regard to their size, materials, construction, location, level and method of illumination and cumulative impact. D7(3)</li> <li>• proposals affecting heritage assets and their setting will be required to preserve or enhance and were appropriate better reveal their architectural and/or historical significance D7(6)</li> </ul> <p>Using the above, in tandem with draft policies D16 (Designated Heritage Assets) D17 (Listed Buildings) and D18 (Conservation</p>

		Areas), there is confidence that that these can be applied successfully to applications involving or affecting heritage assets in order to manage and ensure their preservation, conservation and/or enhancement.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	Compton PC does not support the introduction of any illuminated or neon shop-fronts or signs in the historic section of the High Street.	<p>The policy makes clear the following</p> <ul style="list-style-type: none"> <li>• that illuminated advertisement must not have a detrimental impact on the amenity of adjoining properties and wildlife habitats</li> <li>• that proposals will only be supported where there is no detriment to amenity by reason of method &amp; degree of illumination/luminance (amongst other things)</li> <li>• designs are responsive to, or enhance the appearance, character and vitality of an area by having regard to level &amp; method of illumination (amongst other things)</li> <li>• 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</li> </ul> <p>Using this policy in tandem with draft policies D17 (Listed Buildings) and 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>
Left blank	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 are covered
Left blank	<b>Guildford Residents Association</b>	Left blank
Policy para 1	In para 1) insert: 1) Development proposals for advertisement and signage are required to demonstrate that there is no harm to amenity, <u>character</u> or public safety by reason of:	Under the current regulations applications for advertisement consent can only consider impact on amenity and public safety, which forms the core principles to the policy, and against which such applications/cases would be assessed. The policy would be overstepping the regulations if it were to include the suggestion of character.
Left blank	The explanatory text should refer to size limits for projecting signs in some locations, to avoiding obtrusive use of moving images or totems, to use of vinyl infilling of windows or, as on the Friary, to banners stuck onto architectural features of buildings.	Under the current regulations applications for advertisement consent can only consider impact on amenity and public safety, which forms the core principles to the policy, and against which such applications/cases would be assessed. It would be unreasonable for the explanatory text to stipulate all that is suggested. There needs to be some flexibility with the policy, as each application must be assessed on its own merits and context. Therefore, such a suggestion runs the risk of overstepping the regulations as well as the NPPF.

## Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	<p>With regard to the reply to my question under the Reg18 consultation, I agree that traffic signage may be obligatory. However, the case I had in mind was an unnecessary active information sign installed in the line of view and, if I recall correctly, reminding drivers about COVID at a point where they need to concentrate on a pedestrian crossing near a school. It is not clear to me whether GBC have any involvement in the decision-making for these signs.</p>	<p>Public safety is one of only two matters which advertisement consent can be considered as directed by the regulations and has been 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 of the Local Planning Authority, traffic signage (as defined in section 64(1) of the Road Traffic Regulation Act 1984) being one.</p> <p>The scenario noted is out of the remit of GBC.</p>

## Policy D8: Public Realm

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Ockham Parish Council</b>	Left blank
Policy para 2	Need a new requirement: they do not compromise or remove existing Public Rights of Way.	Public Rights of Way are protected under separate legislation.
Left blank	This should contain a direction that any existing public realm should not be compromised or destroyed	This Policy sets out requirements for new and improved public realm proposals. There are other policies that prevent the unnecessary loss of valuable public realm including open space (LPDMP Policy ID5) and community facilities (LPDMP ID8). There is also separate legislation relating to the closure or diversion of existing highways or public rights of way.
RJ para 5.87	Reducing space for private cars is unrealistic as most households, particularly those out of urban areas, will want to retain their private vehicles.	The Policy seeks to enable the provision of mobility hubs in appropriate locations. In these locations there are greater opportunities for the use of sustainable forms of travel as an alternative to the private car
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank

Left blank	Suggest further safeguards to ensure that the public realm is clearly identified and retained in public ownership. A register of such land must be made available in the public domain; e.g. the council web site.	This is outside the scope of the LPDMP.
Left blank	<b>Savills Planning on behalf of St Edward Homes Ltd</b>	Left blank
Left blank	<p>It is important that the public realm includes tree and landscaping for all sorts of purposes, including biodiversity, good urban environment and shading. However, there can be technical constraints and other planning considerations that all contribute to the decision making process. The planning balance includes making efficient use of land, stringent highway requirements (which generally only permits certain trees), and as well as achieving an attractive environment. Therefore, flexibility is important to ensure the right decisions are made in this respect.</p> <p>The following amendments are proposed:</p> <p><i>2g) new streets <del>should seek to are tree-lined</del> incorporate tree planting where practically achievable, unless there are clear, justifiable <del>and compelling</del> reasons why this would be inappropriate, and their long-term maintenance is secured;</i></p>	The wording used in Policy D8 reflects the wording in para 131 and footnote 50 of the NPPF. To change the policy as suggested would be inconsistent with the NPPF.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	Given most of the public realm is under the control of Surrey County Council it is not clear how this policy will function.	GBC is the Local Planning Authority and grants planning permission. On larger schemes this is likely to include an element of public realm. Surrey County Council is a key stakeholder in this process as the Highway Authority. GBC

		will need to consider the extent to which development proposals which include an element of public realm accords with policy and will secure the long term maintenance and management of this through a legal agreement.
Left blank	<p>The policy should include content related to:</p> <ol style="list-style-type: none"> <li>1. Ongoing maintenance</li> <li>2. Guard against privatisation of streets</li> <li>3. Pedestrianisation of streets</li> <li>4. Removal of parking on main streets</li> <li>5. Prohibited areas for alcohol consumption</li> <li>6. On street dining and fees</li> <li>7. Speed limits</li> <li>8. Street trees to be planted in the ground not containers</li> <li>9. Tree planting in existing streets</li> </ol>	This is beyond the scope of the LPDMP.
Left blank	<b>Savills on behalf of Taylor Wimpey</b>	Left blank
Left blank	<p>Suggest modifications are included, to ensure that the policy is not overly onerous for developers and to ensure the policy is consistent with the LPSS. As worded the policy is ineffective.</p> <p>The following amendments are proposed</p> <p>“2g) all new streets <del>are tree-lined</del> incorporate tree planting unless there are clear, justifiable and compelling reasons why this would be inappropriate, and their long-term maintenance is secured;”</p> <p>3.56. In addition, the following text should be added to part 3:</p>	<p>The wording used in relation to tree-lined streets reflects the wording in para 131 and footnote 50 of the NPPF. To change the policy as suggested would be inconsistent with the NPPF.</p> <p>The suggested wording in relation to public art is already included as supporting text in the Reasoned Justification.</p>

	<p>“3)... d) <u>For strategic sites, public art strategies should be designed and approved in accordance with the Strategic Design Code submitted for each strategic site.</u>”</p> <p>These amendments are considered to improve the policy and ensure that it is consistent with adopted planning policy and the NPPF, and achieves the objective for quality public realm without being overly restrictive. In addition, it would be inappropriate in some locations to enforce that they are tree lined, however it is appreciated tree planting needs to be incorporated where possible. TW also suggests the policy cross refer to LPSS, as the Design Codes submitted with major strategic developments will include measures to ensure a quality public realm.</p>	
Left blank	<b>Guildford Residents’ Association</b>	Left blank
Policy para 2	<p>An additional bullet point under 2) should be a requirement to demonstrate that such proposals are of a scale and gradient consistent with the proposed use and with ease of access in the vicinity of buildings with raised thresholds.</p> <p>Public realm design should provide adequate space around buildings with raised thresholds. Raised thresholds are a common feature linked to flood risk management and where there are changes in ground level across the frontage of buildings. In these circumstances it is necessary to provide sufficient space both for smooth access to the relevant buildings and, also, for ease of circulation and beneficial use of amenity space in the vicinity. In these circumstances, design of public realm should be an early consideration and be assessed before building footprint is determined. Public realm that slopes away from buildings or undulates cause issues for</p>	<p>This is already addressed by LPSS Policy D1(9) which states: ‘All new development will be 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.’</p>

	many users including those using wheelchairs or pushchairs. Benches on awkward slopes have less amenity value.	
Policy para 3	An additional bullet point under 3) should be to consider the opportunity to provide a positive contribution to sustainable urban drainage.	Draft Policy P13: Sustainable Surface Water Management already addresses the requirements for SuDS. This includes that they are considered from the earliest stage of site design to ensure they are fully integrated into the development and that the greatest multifunctional benefits are realised.
Left blank	<b>Compton Parish Council</b>	Left blank
Policy para 3	Change policy 3 on public art to state: "Considered and assessed against the Council's Art Strategy and against public opinion via the use of on-line polling."	The policy requires proposals for public art to have been considered and assessed against the Council's Art Strategy. This strategy sets out requirements for consultation with residents and stakeholders.
Left blank	Add a policy requiring enhancement of the river frontage (in appearance and usage).	Draft Policy D11: The Corridor of The River Wey & Godalming Navigations already includes policy that seeks to improve visual and physical public access to and along the river by providing direct, safe and clear public access to and along the river.

## Policy D9: Residential Infill Development

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Highways England</b>	Left blank
Left blank	<p>The parking implications on the immediate locality are explicitly addressed by Policies H6 and D9 and the supporting text. The cumulative impacts of development on the broader transport system aren't addressed. We recommend Guildford Borough Council actively monitor and manage residential infill and housing conversions with a view to pre-empting traffic issues stemming from the cumulative effects. 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.</p>	<p>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. The adopted LPSS Policy ID3: Sustainable transport for new developments is relevant. This requires, at point (6), that 'New development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable, including the mitigation of its otherwise adverse material impacts, within the context of the cumulative impacts of approved developments and site allocations. This mitigation: (a) will maintain the safe operation and the performance of the Local Road Networks and the Strategic Road Network to the satisfaction of the relevant highway authorities, ...'</p>



## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Compton Parish Council</b>	Left blank
Policy D9 4a	Compton PC agrees with Policy D9 (subject to further clarification) Point C (“Proposals involving ‘back-land’ development must avoid long, narrow and isolated access points”) is too vague. How “long” and “narrow” must the access points be?	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. Draft Policy D9(4) requires safe and suitable access.
Policy D9 2	This Policy is 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 according to how many houses/facilities are built on a particular site.	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 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.
Left blank	The accumulative effect would need to be assessed so that adequate facilities / services accompany intensification (along with adequate CIL).	Infrastructure contributions and delivery is addressed in Policy ID1: Infrastructure and delivery and the Guildford borough Infrastructure Delivery Plan.
Left blank	<b>Guildford Residents Association</b>	Left blank
Policy D9 1b	In para 1b) insert:	Spacing between buildings is one component of what defines and contributes to an area’s character so consideration of this, alongside other factors that help to define character, is already

	<p>1. b) respond positively to the existing character, <b><i>spacing</i></b> and identity of the local area; Spacing between buildings is a trait requiring specific reference to ensure it is not overlooked as a consideration. Such a reference is not prescriptive. It requires that the new spacing responds positively including allowing space for landscaping between buildings where appropriate.</p>	<p>required by this policy. Spacing is also addressed in draft Policy D4(4): Achieving high quality design and local distinctiveness where it refers to layout – settlement pattern of roads, paths, spaces and buildings, urban grain, plot sizes, building patterns, rhythms and lines. It is one of many factors to be taken into account.</p>
Policy D9 1d	<p>In para 1d) insert:</p> <p>1. d) incorporate landscaping measures and ensure that sufficient amenity space, parking, bin storage and cycle parking are available and that they relate well to the buildings within the site <b><i>and within neighbouring properties.</i></b></p> <p>The explanatory text should be explicit that appropriate landscaping will be required within the site and that reliance cannot be placed on landscaping features in an adjoining property.</p>	<p>A decision maker can only take into account the landscaping measures, amenity space, parking, bin storage and cycle parking are available within the planning application site.</p>
Para 5.99	<p>Para 5.99 should be expanded to refer explicitly to avoiding infill that creates a terraced effect, resulting in a wall of development in an area where spacing between properties or groups of properties, often with some landscaping between, is a notable feature of the character.</p>	<p>Policy D9 requires residential infill development proposals to integrate well with surrounding development and the environment and respond positively to the existing character and identity of the local area. This would address proposals with an inappropriate terracing effect. Draft Policy D4(4): Achieving high quality design and local distinctiveness specifically refers to spaces and buildings, urban grain, plot sizes, building patterns, rhythms and lines.</p>
Left blank	<p>Para 5.101 is welcome. Suggest reference is also made here to the impact on neighbouring properties of access. Differences in ground levels should be added to the list of factors that can result in unacceptable impacts on amenity and</p>	<p>Draft Policy D9(4) requires safe and suitable access. Draft Policy D5(1) addresses protection of amenity and development proposals are required to avoid having an unacceptable impact on the living environment of existing residential properties or</p>

	privacy, alongside proximity, orientation and height of new development	resulting in unacceptable living conditions for new residential properties, in terms of: a) Privacy and overlooking b) Visual dominance and overbearing effects of a development.
Left blank	<b>West Clandon Parish Council</b>	Left blank
Left blank	The scope of the policy should be widened to include the 'limited infilling in villages' exception in Green Belt policy	Draft Policy D9 is a design policy not a Green Belt policy. For that reason it is not intended to provide policy to help determine whether a proposal is appropriate or inappropriate in the Green Belt. This is a matter for LPSS Policy P2 and the emerging Green Belt SPD. Draft Policy D9 is applicable to proposals inside and outside of the Green Belt. For a proposal in the Green Belt, the decision taker will first need to assess whether the proposal is appropriate in the Green Belt and, if it is appropriate, would still need to consider its design against draft Policy D9. Simply being appropriate does not mean that it cannot be refused on design grounds.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	The original policy title was Residential Intensification which better represents the need to have a policy that acknowledges and mitigates, or prevents, the impact of this on villages, whether still in, or out, of the Green Belt. It needs to cover infilling, windfall, and speculative back garden development, as well as the demolition of existing and replacement of new, or sometimes 2/3 new homes on the original plot. To us this is an intensification of land use and needs policy to control this.	The definitions section of Draft Policy D9 defines 'infill development' as: 'this includes any new residential development of a vacant site or the redevelopment of a developed site. It includes residential development within a garden'. It is therefore applicable in all instances referred to.

Policy para 3	Needs to include a reference to respecting the existing street scene, especially as this is about frontage development.	Taken together all the factors listed in policy para 3(a – d) contribute to creating the ‘street scene’. The policy states that regard must be had for all of these factors.
Left blank	There should be specific mention of the need to respect visual separation between buildings, frontage widths, distances from the road and existing boundary treatments.	Policy para 3 already includes a requirement to have regard to all these factors.
Left blank	The policy should also include a point to ensure that inappropriate sub-division of curtilages to size below that prevailing in the area will be refused.	Policy para 3 refers to the need to have regard to existing plot sizes. Policy para 1 states that proposals are required to respond positively to the existing character and identity of the local area.
Left blank	<b>Guildford Greenbelt Group</b>	Left blank
Left blank	The previous title of this Policy for Regulation 18 (Residential Intensification) better reflected the current and likely future situation of a mixture of types of development that are negatively impacting our Borough. It is not just about infilling, but also windfall development, which is happening at a greater pace than intended, ‘garden grabbing’ etc. There should be a more specific policy on back garden/green field development, if it cannot be accommodated within this policy. This impacts both urban and rural settings, and has a detrimental effect on our natural environment and the movement of wildlife.	The definitions section of Draft Policy D9 defines ‘infill development’ as: ‘this includes any new residential development of a vacant site or the redevelopment of a developed site. It includes residential development within a garden’. It is therefore applicable in all instances referred to. There is a section of the policy specifically related to backland development proposals. The definition states: ‘this normally comprises development on land behind the rear building line of existing housing or other development, usually on former garden land or partially enclosed by gardens’.
Left blank	GGG recommends that the prevention of inappropriate sub-division of existing curtilages to a size below that in the prevailing area is resisted. This will help preserve existing mature landscapes.	Policy para 3 refers to the need to have regard to existing plot sizes. Policy para 1 states that proposals are required to respond positively to the existing character and identity of the local area. Taken together all the factors listed in policy para

	<p>The policy also needs to cover protection of existing street scenes or prevailing layout of streets in the local area, including frontage width, building orientation, visual separation between buildings and distances from the road.</p> <p>Frontage development needs to ensure that it refers to protecting the existing street scene within the policy.</p>	<p>3(a – d) contribute to creating the ‘street scene’. The policy states that regard must be had for all of these factors.</p>
Left blank	<p>Recommend an addition to Policy D9 point 1b) respond positively to the existing character, and landscape setting, and identity of the local area.</p>	<p>This is already required by LPSS Policy D1(4) and Draft Policy D4(3) which address the need for development proposals to respond positively to the prevailing character and landscape setting.</p>
Left blank	<p>Include a point e) opportunities for the preservation, enhancement, or creation of green and blue infrastructure connections should be maximised, e.g., retention/creation of wildlife corridors.</p>	<p>This is already required by Policy P6/P7(9) which expects development proposals to create areas of new habitat and provide appropriate links and corridors between new and existing habitats, avoiding and reversing fragmentation and species isolation; and that development sites and built features are expected to be permeable for wildlife.</p>
Left blank	<p><b>Burpham Neighbourhood Forum</b></p>	<p>Left blank</p>
Policy para 2	<p>Question if this is legally enforceable, and we suggest a land registry Title block date is established such that any attempt to sub divide the plot, say, one year before submission of the ‘first’ planning application is clearly identified and therefore still subject to these policy requirements.</p>	<p>It would not be reasonable to require this to be submitted as part of a planning application.</p>

Left blank	The policy should make Reference to Neighbourhood Plans particularly where they have policies on infilling and these should take precedence in the Neighbourhood Plan areas.	Neighbourhood plans are recognised in their own right as part of the development plan. The supporting text at para 5.96 refers to the importance of taking into account local design guidance contained in neighbourhood plans.
Left blank	<b>Savills Planning on behalf of St Edward Homes Ltd</b>	Left blank
Left blank	<p>Policy is ineffective.</p> <p>As per the definition in paragraph 5.91 of the LPDMP infill development “includes any new residential development of a vacant site or the redevelopment of a developed site. It includes residential development within a garden. For the avoidance of doubt this does not carry the same definition as ‘limited infilling’ for Green Belt purposes.” Therefore this policy should be aimed at infill development only and not confuse this with development concerning larger-scale, allocated sites. This should be made clearer in the policy or as part of the Glossary so that there is no confusion.</p>	<p>This policy is applicable to any scale of development that meets the definition however the relevance of different parts of the policy will depend upon the nature of the scheme being proposed. As it applies to ‘infill’ sites it would not be relevant to the majority of the strategic sites as these comprise of either urban extensions or a new settlement but would apply to many other allocations that are located within the existing built up area.</p>
Left blank	<p>Whilst St Edward understand the importance of comprehensive masterplanning and ensuring that sites, where there are separate landownerships, do not prejudice the separate land parcels, there are other policies in the LPSS and LPDMP in place, such as those relating to design which cover this issue.</p> <p>3.54. St Edward suggest the following amends to the policy, indicated in red and strikethrough:</p> <p>“2) <del>Piecemeal development proposals will be resisted.</del> Where the Council considers that land has come forward which has been artificially subdivided, it will require appropriate infrastructure contributions commensurate with what would have been required on the larger site. Contributions will be</p>	<p>It is considered that the supporting text sufficiently clarifies the context within which this part of the policy will be assessed. Para 5.98 states: ‘Piecemeal development, where individual applications reflect artificial subdivision from a larger developable area can result in unintegrated development with poor layout, lack of infrastructure or affordable housing provision. Where reasons for bringing forward smaller portions of a developable area are sufficiently justified and it is not considered to be artificial subdivision, development proposals are expected to reflect how they may integrate with remaining undeveloped portions of the development site.’</p>

	<p>based on a level of development across the comprehensive area which the Council considers appropriate.”</p> <p>3.55. In addition, the following should be added to the supporting text definitions (additional text in red):</p> <p>“5.94 Piecemeal development - in the context of this policy relates to <u>small-scale</u> uncoordinated development where individual applications are submitted for development across a <del>larger</del> developable area.”</p>	<p>The expectation that development proposals integrate with their surroundings is considered justified and a key objective of good design. The policy as drafted is considered to provide sufficient flexibility to not prejudice the delivery of land under separate landownerships.</p> <p>To aid clarity a minor modification is proposed to the definition of ‘piecemeal development’:</p> <p><i>Piecemeal development</i> - in the context of this policy relates to uncoordinated development where individual applications are submitted for development across a larger developable area <u>where this is done in order to deliberately avoid infrastructure provision, contributions or affordable housing that are triggered at certain thresholds.</u></p>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	<p>It is not understood what “piecemeal” development means. Much infilling will be single property, or few.</p>	<p>To aid clarity a minor modification is proposed to the definition of ‘piecemeal development’:</p> <p><i>Piecemeal development</i> - in the context of this policy relates to uncoordinated development where individual applications are submitted for development across a larger developable area <u>where this is done in order to deliberately avoid infrastructure provision, contributions or affordable housing that are triggered at certain thresholds.</u></p>
Left blank	<p>It is not understood why villages have special objectives; these same issues apply in urban areas of the town, particularly those close to countryside. Make these general requirements.</p>	<p>It is considered that these issues are particularly relevant to villages where the transition from built up area to rural countryside is much more pronounced and can be more sensitive to change. There is also a greater likelihood of residential infill development proposals within these fringe</p>

		<p>areas. The transition from built up area to open countryside is relevant at the edges of urban areas too however these proposals are not likely to be the result of residential infill development and so would be addressed through the policy requirements set out in draft Policy D4(3) which requires development proposals to respond positively to their context including landscape.</p>
Left blank	<b>Savills Planning on behalf of Taylor Wimpy</b>	Left blank
Left blank	<p>Add clarity to the policy to ensure that it is clear which sites the policy is directed at, i.e. not strategic sites.</p> <p>As per the definition in paragraph 5.91 infill development “includes any new residential development of a vacant site or the redevelopment of a developed site. It includes residential development within a garden. For the avoidance of doubt this does not carry the same definition as ‘limited infilling’ for Green Belt purposes.” Therefore this policy should be aimed at infill development only and not confuse this with development concerning larger-scale, allocated sites. This should be made clear in the policy so that there is no confusion.</p>	<p>This policy is applicable to any scale of development that meets the definition however the relevance of different parts of the policy will depend upon the nature of the scheme being proposed. As it applies to ‘infill’ sites it would not be relevant to the majority of the strategic sites as these comprise of either urban extensions or a new settlement but would apply to many other allocations that are located within the existing built up area.</p>
Left blank	<p>TW understand the importance of comprehensive masterplanning and ensuring that sites, particularly where there are separate landownerships, do not prejudice the separate land parcels. Other policies such as those relating to design cover this issue.</p> <p>Suggest the following amends to the policy:</p> <p>“2) <del>Piecemeal development proposals will be resisted.</del> Where the Council considers that land has come forward which has been artificially subdivided, it will require appropriate</p>	<p>It is considered that the supporting text sufficiently clarifies the context within which this part of the policy will be assessed. Para 5.98 states: ‘Piecemeal development, where individual applications reflect artificial subdivision from a larger developable area can result in unintegrated development with poor layout, lack of infrastructure or affordable housing provision. Where reasons for bringing forward smaller portions of a developable area are sufficiently justified and it is not considered to be artificial subdivision, development proposals are expected to reflect how they may integrate with remaining undeveloped portions of the development site.’</p>



<p><i>infrastructure contributions commensurate with what would have been required on the larger site. Contributions will be based on a level of development across the comprehensive area which the Council considers appropriate.”</i></p> <p>If GBC do not agree with the deletion of this sentence then TW believe the following should be amended to the supporting text definitions (additional text in red and deletion in strikethrough):</p> <p><i>“5.94 Piecemeal development - in the context of this policy relates to <u>small-scale</u> uncoordinated development where individual applications are submitted for development across a <del>larger</del> developable area.”</i></p> <p>Overall, TW believe these changes are essential as the policy is not clear as it stands and is open to interpretation which could hinder allocated site. The point on comprehensive masterplanning is covered by adopted Policy D1 and the SDF SPD. TW request that the policy is altered as per the suggestion above.</p>	<p>The expectation that development proposals integrate with their surroundings is considered justified and a key objective of good design. The policy as drafted is considered to provide sufficient flexibility to not prejudice the delivery of land under separate landownerships.</p> <p>To aid clarity a minor modification is proposed to the definition of ‘piecemeal development’:</p> <p><i>Piecemeal development</i> - in the context of this policy relates to uncoordinated development where individual applications are submitted for development across a larger developable area <u>where this is done in order to deliberately avoid infrastructure provision, contributions or affordable housing that are triggered at certain thresholds.</u></p>
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## Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	The scope of the policy should be widened to include the ‘limited infilling in villages’ exception in Green Belt policy	Draft Policy D9 is a design policy not a Green Belt policy. For that reason it is not intended to provide policy to help determine whether a proposal is appropriate or inappropriate in the Green Belt. This is a matter for LPSS Policy P2 and the emerging Green Belt SPD. Draft Policy D9 is applicable to

		<p>proposals inside and outside of the Green Belt. For a proposal in the Green Belt, the decision taker will first need to assess whether the proposal is appropriate in the Green Belt and, if it is appropriate, would still need to consider its design against draft Policy D9. Simply being appropriate does not mean that it cannot be refused on design grounds.</p>
Left blank	<p>The actual policy wording should also mention the aspects covered in 5.96, which include biodiversity, and 5.100 as a requirement. Examples of inappropriate access arrangements could include safety issues, breaking up a roadside landscape feature such as a bank or tree line and removal of significant trees.</p>	<p>Draft Policy P6/P7(9) and (12) provides requirements for site design that creates /preserves wildlife linkages and biodiversity net gain. LPSS Policy D1(4) and Draft Policy D4(3) address the need to respond positively to the landscape setting. Draft Policy D9(4) requires safe and suitable access.</p>

DRAFT

## Policy D10: Noise Impacts

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	<p>We repeat our request for specific conditions, including:</p> <p><u>No increase in noisy activities or noise spillage will be allowed for established enterprises that adjoin or are close to established residential properties or areas.</u></p>	<p>The Noise Impacts policy cannot be applied retrospectively to existing development or to proposals that do not require planning permission. However, relevant existing developments are managed through the licensing regime.</p> <p>If a development proposal requires planning permission Policy D10 may apply including the Agent of Change principle, detailed in Paragraph 5.109, which is intended to address these types of potential issues. Criterion 5 stipulates this where:</p> <p>5) The applicant proposing the development proposal (or ‘agent of change’) is responsible for ensuring that:</p>

		<p>a) all potential Observed Adverse Effect Levels of noise, either impacting on or emanating from the proposed development proposal, are identified, and</p> <p>b) the prevention, avoidance and/or mitigation measures required to manage those noise impacts are implemented effectively.</p> <p>This ensures there will be no unacceptable adverse impact on sensitive receptors as a result of the development.</p>
Left blank	<u>New “noise generating” activities must be separated from residential areas.</u>	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. If the new activity would cause an unacceptable adverse effect on sensitive receptors in a residential area, then the planning application would be refused.
Left blank	<b>Sport England</b>	Left blank
Left blank	Sport England refers to our comments at the preferred options stage in which we comment that the approach to the Agent of Change principle is too narrow. Sport England notes that our comments have not been taken into account on this matter and that the focus of the policy is too narrow with an emphasis on noise only. Sport England considers that other impacts eg lighting should be included, especially as new development within close proximity to sports facilities which are floodlit may give rise to lighting issues.	<p>Since the Regulation 18 Issues and Preferred Options Consultation the document has evolved and been amended for the Regulation 19 Consultation, taking into account comments made during the previous consultation.</p> <p>New policy D10a: Light Impacts and Dark Skies has been added to the LPDMP. D10a follows a similar approach to Policy D10 to ensure lighting impacts are covered. Potential effects are required to be identified, then avoided or mitigated</p>

		as appropriate so there are no unacceptable adverse impacts on sensitive receptors.
Left blank	<b>Guildford Residents Association</b>	Left blank
Left blank	The introduction should refer to the increase in residential use of town centres making effective management of noise from clubs and pubs, including from outdoor smoking areas, more important.	<p>The Noise Impacts policy cannot be applied retrospectively to existing development or to proposals that do not require planning permission. However, relevant existing developments are managed through the licensing regime.</p> <p>If a development proposal requires planning permission Policy D10 may apply including the Agent of Change principle, detailed in Paragraph 5.109, which is intended to address these types of potential issues. Criterion 5 stipulates this where:</p> <p>5) The applicant proposing the development proposal (or 'agent of change') is responsible for ensuring that:</p> <ul style="list-style-type: none"> <li>a) all potential Observed Adverse Effect Levels of noise, either impacting on or emanating from the proposed development proposal, are identified, and</li> <li>b) the prevention, avoidance and/or mitigation measures required to manage those noise impacts are implemented effectively.</li> </ul> <p>This ensures there will be no unacceptable adverse impact on sensitive receptors as a result of the development.</p>

Left blank	<p>It should be explicit and clear that this policy will ensure noise from school play areas and pitches (including all weather surfaces) will be considered and managed appropriately where this would have an impact on adjoining residential areas. It should no longer be possible to permit development which means residents cannot sleep or work with their windows open in summer. Adequate landscaping within application sites and other mitigation should be required and should take account of relative land levels.</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. If the new activity would cause an unacceptable adverse effect on sensitive receptors in a residential area, then the planning application would be refused.</p> <p>Any mitigation measures would be determined on a case-by-case basis.</p>
Left blank	<p><b>Compton Parish Council</b></p>	Left blank
Left blank	<p>Lorries and motor bikes are especially noisy as is stop/start traffic. Greater consideration should be given to signage and suggested networks for lorries and motor bikes/motor bike shops where they pass through residential areas. Where possible, average speed cameras would also improve noise from acceleration/breaking as well as improve safety.</p>	<p>This is beyond the scope of the LPDMP.</p>

## Policy D10a: Light Impacts and Dark Skies

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Union4 Planning</b>	Left blank
Policy para 6	It is considered that part 6 should recognise that if lighting is required as an essential part of the ongoing operation of a site, a proactive view should be taken on the extent to which it could be deemed to cause light pollution.	<p>This is addressed under the policy criteria. If development constitutes light-generating development then it is required to submit a Light Impact Assessment to determine the potential impact of the development. The necessity for external lighting and the benefits they provide will be balanced against the impact of potential obtrusive light.</p> <p>If the impact is deemed unacceptable and cannot be mitigated through appropriate measures then the application will be refused.</p>
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	There should be a policy that any development with any lighting should be shaded such that no light escapes outside the property line or the overall development. ie	Paragraph: 001 Reference ID: 31-001-20191101 does not stipulate 'lighting should be shaded such that no light escapes outside the property line'. The NPPF 2021 states the impact of light pollution from artificial light should be limited, and the

	complying with latest Dark skies Government Guidance Paragraph: 001 Reference ID: 31-001-20191101	policy allows the impact to be assessed (alongside other considerations) by the planning decision maker on a case-by-case basis.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	However, clear and quantitative limits need to be applied and also reference made to the street lighting that is under the control of SCC. We ask that a condition be made that security lighting does not shine into any close residential property.	<p>It would be too prescriptive to impose quantitative limits on lighting as each development is assessed on a case-by-case basis where the necessity for external lighting and the benefits they provide will be balanced against the impact of potential obtrusive light.</p> <p>It is considered unnecessary to reference street lighting under the control of SCC as the LPDMP has no bearing on this.</p> <p>Paragraphs 5.153 to 5.155 of the Reasoned Justification states external (security) lightning that is not engineering operation does not constitute development and therefore does not require planning permission. Thus, it is beyond the control of the LPDMP and it outside the scope of the policy.</p>
Left blank	<b>Guildford Residents Association</b>	Left blank
Policy para 1	<p>In para 1) insert:</p> <p>1) ... Consideration must be given to potential adverse impacts on privacy, amenity, <b>views</b> and the natural environment, including wildlife, sensitive habitats, and sites designated for their nature conservation value.</p>	<p>It is deemed 'views' is adequately covered by the term amenity as this includes the attractiveness of a place. Adverse impacts on amenity by obtrusive light, could include impacts on visual amenity and the enjoyment of views of a place.</p>



		Further, Policy D4(3) reflects that development proposals should respond positively to significant views. It is considered that this would include in relation to any light impacts. Policy D4 also references the Guildford Town Centre Views SPD which indicates that consideration should be given to the impact of any development on night-time views.
Policy para 2	<p>In para 2) insert:</p> <p>2) ... Light Impact Assessments are required to clearly detail any potential significant adverse impacts, <b><u>including cumulative effects</u></b>, that artificial lighting may have on privacy, amenity, and the natural environment, including wildlife, sensitive habitats and sites designated for their nature conservation value</p> <p>The effect on the amenity of residents of additional lighting proposals at schools or sports facilities is a growing issue.</p>	<p>The Reasoned Justification details that Light Impact Assessments should be proportionate to the scale of the proposed development and the likely significant adverse impacts. The specific approach and methodology undertaken for each assessment should be tailored to address the specific issues driving the need for the assessment. Planning applications only assess the development proposed in relation to the existing built environment. The present situation is used to form a baseline for which the impact of new development is assessed against to determine if there will be any significant adverse impacts.</p> <p>Furthermore, Grampian conditions can be used to enact off-site works on land not controlled by the applicant to reduce the adverse impact on sensitive receptors.</p>
Para 5.166	The reference that “River channels and waterbodies with their wider corridors should be considered Intrinsically Dark Areas” is also welcome. However, the proposed use of directional and focused lighting would be insufficient to achieve this. The policy and reasoning should advise that, where possible, the layout of a development should avoid placing features that require lighting, such as roads, close to a watercourse.	This is considered unnecessary. The policy already stipulates that development are required to prevent and/or avoid unacceptable light spillage, this could be through measures such as the design and layout of the development. The policy ensures there is flexibility for each proposal to be designed in an appropriate manner, in relation to its context, on a case-by-case basis.
Left blank	<b>CPRE</b>	Left blank

<p>Policy para 6</p>	<p>We would like “remote” removed and this line amended to cover any development proposals of any Green Belt land that lies within the Surrey Hills AONB.</p>	<p>The entire Borough of Guildford suffers from some level of light pollution and the policy specifies remote in accordance with Policy P2 of the Planning Management Policies in the Surrey Hills Management Plan where it states “In remoter locations, with darker skies, development proposals causing light pollution will be resisted” (<a href="#">Management Plan   Surrey Hills</a>).</p> <p>Instead of a blanket approach, it is more appropriate to respond to specific local circumstances and the policy is designed to give the darkest areas a greater level of protection from further light pollution, in addition to that already stipulated in the policy. Additionally, some Neighbourhood Plans have policies related to this where this is locally justified by evidence.</p>
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
<p>Policy para 6</p>	<p>It is good that protection of the Surrey Hills from light pollution is included. However, light pollution, not just in remote areas but any part of the Surrey Hills AONB can harm both near and far views reaching into the surrounding hills, impacting on night skies and on the enjoyment of night skies. The night sky seen from all parts of the AONB and even from gardens bordering the AONB needs protection.</p>	<p>All areas of the Borough are protected from unacceptable light pollution by the policy. Development proposals are required to be designed to minimise obtrusive light and the policy allows the impact to be assessed (alongside other considerations) by the planning decision maker on a case-by-case basis, for areas within and outside the AONB.</p>

	<p>Perhaps the above sentence written under “Dark Skies” could be more inclusive of the Surrey Hills AONB, as by referring to one part only, it implies that other parts are not protected from light pollution.</p>	<p>The entire Borough of Guildford suffers from some level of light pollution and the policy specifies remote in accordance with Policy P2 of the Planning Management Policies in the Surrey Hills Management Plan where it states “In remoter locations, with darker skies, development proposals causing light pollution will be resisted” (<u>Management Plan   Surrey Hills</u>).</p> <p>Instead of a blanket approach, it is more appropriate to respond to specific local circumstances and the policy is designed to give the darkest areas a greater level of protection from further light pollution, in addition to that already stipulated in the policy. Additionally, some Neighbourhood Plans have policies related to this where this is locally justified by evidence.</p>
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## Policy D11: The Corridor of the River Wey & Godalming Navigations

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	We particularly agree with the changes made to and justifications provided to support Policies P12 and D11 and we support these policies	Noted

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Merrow Residents' Association</b>	Left blank
Policy para 2	The policy should specifically limit building heights so that they comply not only with the above limitation but also restrict building heights to maintain the historic character of this waterway.	The policy already requires that development proposals conserve and enhance the distinct character of the Navigations, including its visual setting (1a), establish a positive relationship with the Navigations' setting and waterfront character and its historic interest (1c) and protect, and where possible, enhance key existing views to, from, across and along the river (1d). It is therefore considered that strong policy provisions already exist to restrict inappropriate

		building heights which would impact upon the historic character of the waterway.
Left blank	<b>DP9</b>	Left blank
Policy para 2	<p>Any proposed improvements need to be considered against the existing context and each site should be considered on a case-by-case basis.</p> <p>We therefore believe that the policy wording should be amended to:  <i>“Development proposals adjoining the river are expected <b>where possible</b> to seek to improve visual and physical public access to and along the river by...”</i></p>	<p>Policy para 2 is an expectation rather than a requirement. Furthermore, it is an expectation <i>to seek to improve</i> that is being sought rather than the improvement itself (namely an expectation that one explores if one is able to do it). This provides sufficient flexibility for the applicant to demonstrate why in their case it was not possible to improve visual and physical public access to the river.</p>
Left blank	<b>Guildford Residents’ Association</b>	Left blank
Policy para 1	<p>An additional requirement under 1) should be to:  <u><i>Be set back sufficiently to avoid intrusion into the landscape setting or functioning of the river and of a scale that avoids overshadowing the river or an overbearing impact on riverside amenity.</i></u></p>	<p>This suggestion is not accepted. As the LPDMP is to be read as a whole, it is therefore considered that the contents of draft policy D11(1), particularly parts a) and b), when read in combination with draft policy P12(5), which relates to the retention or reinstatement of a minimum 10m undeveloped buffer zone on both sides of the riverbank would satisfactorily deal with what is being suggested here.</p>
Policy para 1(c)	<p>Bullet point 1c) needs amending to avoid being applied and causing harm in more rural parts of the Wey Corridor or near areas of high nature conservation importance such as the stretch by Weyside Urban Village.</p> <p>We suggest amending as follows:</p>	<p>It is considered that this is already addressed through the requirement at D11(1a) which states that development proposals are required to ‘conserve and enhance the distinct character of the Navigations, including its visual setting, amenity, recreational and ecological value, and architectural and historic interest’. This</p>

	<p>c) establish a positive relationship with the Navigations' setting and waterfront character and its historic <u>and ecological</u> interest, <i>taking full advantage of its location</i>, addressing the waterway as a frontage and opening up views in the town centre, <u>and enhancing the green buffer between the river and development outside the town centre;</u></p> <p>Opening up views of the river environment at Weyside Urban Village, in the vicinity of Riverside Park, would be a retrograde and damaging step and at odds with other policies in this Plan. At Weyside the policy objective should be for residents to be able to enjoy access to the river corridor through a buffer of trees, rather than for buildings to be seen from, and thereby destroy, the riverside environment</p>	<p>will ensure that nature conservation is considered as well as the varying character of the River Wey at different locations. Notwithstanding this, as the policy is to be read in conjunction with other policies in the draft LPDMP, and with that is considered that draft policies P6/P7, P8/P9 and P12 would provide further reinforcement.</p> <p>All development proposals would need to meet the requirements of D11(1a). The purpose of Policy D11(1c) is where there are development proposals that are found to be appropriate on the river frontage that these should enable views of the river from the buildings rather than turn their back on the river.</p>
<p>Policy par 2</p>	<p>Suggestion to insert the following:</p> <p>Development proposals adjoining the river are expected to seek to improve visual and physical public access to and along the river <u>and the green character of the river corridor</u> by:</p> <ol style="list-style-type: none"> <li>1. a) providing direct, safe and clear public access to and along the river;</li> <li>2. b) providing a 'joined-up' approach to river access, considering access and uses up and down stream, as</li> </ol>	<p>Not accepted. Draft policy paragraph 2 is solely concerned with improving visual and physical public access to the Corridor, and the suggestions being made are unrelated to this theme and thus are not appropriate in this context. Notwithstanding this, it is considered that the suggested additions are items which are satisfactorily covered by draft policy D11(1a) and to a certain extent D11(1b).</p>

	<p>well as across the river channel and the adjoining areas to the existing towpath;</p> <p><b><u>#) enhancing the ecological potential along each bank of the river with native landscape features;</u></b> and</p> <p>1. c) enabling and supporting the promotion of active and healthier lifestyles.</p>	
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
RJ para 5.169	<p>Support the policies, but we would ask for the following changes / additions:</p> <p>Under 5.169 clarify that all the navigation is a Conservation Area, but that some sections are also within other Conservation Areas.</p>	<p>RJ para 5.169 does clarify that all the navigation is a Conservation Area by stating the following:</p> <p><i>“the Navigation’s entire length is covered by one of five Conservation Area designations. The majority of its course throughout the borough is covered by the Wey &amp; Godalming Navigations Conservation Area, which was designated in 1999, however there are small sections that are encompassed within the following designations:</i></p> <ul style="list-style-type: none"> <li>• <i>Bridge Street Conservation Area</i></li> <li>• <i>Millmead and Portsmouth Road Conservation Area</i></li> <li>• <i>Ockham Mill Conservation Area</i></li> <li>• <i>St Catherines Conservation Area”</i></li> </ul>
Left blank	<p>There be no further development on the flood plain of the river, and that development beyond this be largely limited to new dwellings and limited provision of commercial services for planned extra residents, with a set back from the river.</p>	<p>It is considered that the points being made here are covered by a combination of LPSS policy P4 (Flooding, flood risk and groundwater protection zones) and LPDMP draft policy P12 (Water Quality, Waterbodies and Riparian Corridor). As such</p>

		the inclusion of this suggestion is not accepted. The Local Plan needs to be read as a whole.
Left blank	The riverside be everywhere returned to a natural state so that a continuous wildlife corridor is available, for the enjoyment of visitors as well as for wildlife	It is considered that the points being made here are satisfactorily covered by a combination of draft policies D11(1a) and D11(1b) as well as draft policy P12 (Water Quality, Waterbodies and Riparian Corridors).
Left blank	<b>Iceni Projects Ltd</b>	Left blank
Policy par 2	<p>We support the broad aims of this policy to open up access to the river for public enjoyment and to achieve the stated aims of the policy. We would however note that such opening up on land in private ownership would be subject to the landowner's support and the feasibility and desirability of doing so, depending on the nature of the site and the development proposals. For example, some sites may be on stretches of the river where there is no obvious destination or where there are practical reasons why public access would not be desirable. In such circumstances, the requirement to open up access to the riverfront would not be reasonable or deliverable.</p> <p>In order to address these points and ensure the policy is sound, we consider that the wording should be updated as follows:  "2) Development proposals adjoining the river are</p>	Policy para 2 is an expectation rather than a requirement. Furthermore, it is an expectation <i>to seek to improve</i> that is being sought rather than the improvement itself (namely an expectation that one explores if one is able to do it). This provides sufficient flexibility for the applicant to demonstrate why in their case it was not feasible or appropriate to improve visual and physical public access to the river.



	expected, <u>where feasible and appropriate</u> , to improve visual and physical public access to and along the river by...”	
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	Compton PC 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 LPDMP is to be read as a whole with this policy being read in conjunction with draft policy P12 (Water Quality, Waterbodies and Riparian Corridors).
Left blank	<b>Quod on behalf of Portland Capital</b>	Left blank
Left blank	<p>The approach relative to the provision of features seeking to enhance the riverside should be kept flexible where this may compromise wider delivery and be reviewed on a site-specific basis. 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.</p> <p>At present Policy P12 (Water Quality, Waterbodies and Riparian Corridors) has the potential to conflict with policy D11 in the context that that it seeks to impose a 10m buffer with no consideration of quantitative factors and other benefits to be delivered such as those referenced in Criteria 2 which could be undermined by such a requirement.</p> <p>The two policies need to be aligned with policy P12 updated to allow additional flexibility (recognition of quantitative factors) and a revised buffer requirement which is consistent with Environment Agency approach.</p>	<p>It is considered that there is no conflict with draft policy P12 particularly as paragraph 4.154 of the supporting text for P12, discusses access and recreation.</p> <p><i>“In order to protect and enhance main rivers, a minimum 10-metre undeveloped buffer on both sides 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. Such a buffer can make a contribution to the borough’s green infrastructure providing wildlife corridors that connect larger areas of habitat, space for recreation and leisure, areas of natural flood management and it can reduce pollution reaching aquatic habitats.”</i></p>

Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Policy para 1(c)	Section 1C states a desire to open up views which contradicts section 1A, which seeks to conserve and enhance its visual setting. This should be deleted from section 1C.	All development proposals would need to meet the requirements of D11(1a). The purpose of Policy D11(1c) is where there are development proposals that are found to be appropriate on the river frontage that these should enable views of the river from the buildings rather than turn their back on the river. These policy requirements are therefore not considered to be contradictory.
Policy para 2	<p>Section 2 which seeks to 'improve public access' is contradictory as it will destroy the area downstream below Stoke Lock in its entirety by changing the distinct character of the Navigations including its current semi enclosed visual setting, in direct contradiction of section 1A.</p> <p>We support the protection of the Heritage asset of the river but strongly suggest that the town centre area and the countryside areas are separated in policy terms such that the Countryside is not urbanised in anyway I.e. above the Tumble weir and below Stoke Lock should be classed as countryside.</p>	It is not considered necessary or desirable to split the policy. It is acknowledged that the River is not a homogenous entity and the approach and application of policy will vary depending on its location and context. Policy para 2 is an expectation to seek to improve access rather than a requirement. It will therefore be considered on a case by case basis whether in that instance it is appropriate or feasible. Policy para 1a is a requirement and all development proposals will need to demonstrate how they have responded to those requirements.

## Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	<p>Agree that the river and navigations are under-used assets. Plan's proposals are excellent. The council should further study how to incorporate the river and navigations more into the body of the town to become a key asset and improve well-being and attract tourists. Proposed options:</p> <ul style="list-style-type: none"> <li>• Extend the High Street down to the river so that the banks can easily be part of the social life of visitors to the town centre.</li> <li>• An area at the bottom of the High Street with gardens and cafes where shoppers and others could easily enjoy the waterside.</li> <li>• Remove A281 physical and view barrier.</li> <li>• Demise of Debenhams provides an opportunity to consider some radical ideas.</li> <li>• Putting the main road in a tunnel past the bottom of the High Street, diverting it west of the river before the Yvonne Arnaud Theatre or building a sweeping ramp from the High Street over the main road to the river.</li> <li>• The current small restricted car parking area southwest of the river could also be incorporated into the gardens</li> <li>• Improved economy to offset costs of works.</li> </ul>	Beyond the scope of the LPDMP

## Policy D12: Sustainable and Low Impact Development

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	Support the policy.	Left blank

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Thames Water</b>	Left blank
Left blank	<p>We support Policy D12 in relation to water efficiency, but as previously indicated, we consider that further text is required in relation to the use of planning conditions.</p> <p>The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the</p>	<p>The 105 litre standard is already implemented by virtue of Local Plan: Strategy and Sites (LPSS) policy D2 (1)(d). This policy requires ‘water efficiency that meets the highest national standard’ which the supporting text for D2 at 4.5.29 clarifies that for dwellings is currently the 105 litre standard. The relevant condition is applied in all schemes that include new dwellings.</p> <p>LPSS Policy D2 also requires all schemes to be water efficient and, in practice, refurbishments and commercial developments are also achieving the 105 litre standard.</p>

	<p>building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Proposed policy text:</p> <p>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</p>	<p>Compliance is demonstrated through submission of a sustainability statement (for majors) or sustainability information (for non-majors), as required by LPSS policy D2 (3). As a result, we do not think the implementation of an equivalent BREEAM standard is justified as doing so would introduce a new process cost for developers but result in the same outcome.</p>
Left blank	<b>Guildford Greenbelt Group</b>	Left blank
Policy para 1	<p>Point 1 of this policy refers to Fabric First and it would be useful if applicants/developers were required to indicate how they propose to work towards zero carbon.</p>	<p>It is assumed this comment means that applicants should show how their developments are zero carbon ready, or how they are adaptable for zero carbon operation.</p> <p>The new building regulations entering into force in June 2022 require new dwellings with wet heating systems (e.g. central heating) to be able to operate at a low temperature not greater than 55 degrees, and as a result these dwellings will be heat-pump ready. Commercial buildings are already built to this standard. Dwellings with direct electric heating systems will also be zero carbon ready and will decarbonise with the electricity grid.</p>

		<p>Policy D2 (2) requires developments to follow the energy hierarchy and D12 (1) clarifies that this means a ‘fabric first’ approach that prioritises energy efficiency (which includes good insulation and low air leakage rates). High levels of efficiency are necessary to ensure that low temperature and direct electric heating systems are effective and affordable, so the existing and proposed policies will assist in delivering zero carbon ready development.</p> <p>Details of how the energy hierarchy has been applied in the design of a proposed scheme must be included in energy statements (for major developments) or energy information (for minor developments) which allows decision makers to form a view on whether the energy hierarchy and ‘fabric first’ principles have been applied.</p> <p>Policy D2 (1) also strongly supports zero carbon development and Policy D14 (5) strongly encourages proposals to improve upon the maximum carbon emission standards set out in the policy.</p>
Left blank	<p>The policy, or certainly the justification, should make reference to the need to use natural building materials where possible in recognition of the need to reduce ‘lifetime’ waste of developments.</p>	<p>Not all natural building materials are sustainable (for example, limestone paving and primary aggregates) and some artificial materials, such as composite roof tiles composed of recycled aggregate and metal frames that can be reused or recycled post demolition, should be considered low waste.</p> <p>The use of timber in construction results in the sequestration of formerly atmospheric carbon within the building, and this benefit is acknowledged in the Climate Change, Sustainable Design and Construction SPD and can be accorded weight in planning decisions when considering the overall sustainability of a proposal.</p>

Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Policy para 2	Section 2a [sourcing local materials] needs to be defined. In reality, as there is no softwood saw mill within 50 miles of Guildford or Large capacity Brickworks within 100 miles this is an unsustainable statement.	Local sourcing is a commonly understood concept in construction. Realistically, the definition of 'local' will depend upon the material but in practice it means using the materials available locally rather than importing unusual materials over large distances, for example using bricks from regional kilns rather than importing Dutch bricks from the Netherlands.
Left blank	<b>Bloor Homes</b>	Left blank
Left blank	<p>Object on the basis that it is not required and duplicates on matters that are covered by the LPSS, Climate Change, Sustainable Design, Construction and Energy SPD, the NPPF and legislation. The policy should be deleted.</p> <p>Policy D2: Climate Change, Sustainable design, Construction and Energy of the LPSS already includes many of the requirements specified in the LPDMP Policies D12, D13, D14 and D15. Furthermore, the recently adopted Climate Change, Sustainable Design, Construction and Energy SPD already provides guidance to assist developers in complying with the requirements of Policy D2 of the LPSS.</p> <p>On this basis, it is not considered necessary to include further policies within the LPDMP. In addition, it would add considerably to the already lengthy and detailed policies and guidance on sustainable development of the GBC development plan (including relevant SPD).</p>	<p>LPSS Policy D2 is a strategic policy. D12 adds detail to D2 in order to improve implementation e.g. where Policy D2 implements the energy and waste hierarchies, D12 clarifies that the energy hierarchy requires a 'fabric first' approach and requires major developments to implement Site Waste Management Plans to manage waste sustainably.</p> <p>D12 also reinforces some of the guidance in the Climate Change, Sustainable Design, Construction and Energy SPD: while embodied carbon is already covered by the overarching requirement in policy D2 (1) to incorporate sustainable design and construction practice, policy D12 makes consideration of embodied carbon an explicit requirement, which reinforces the relevant guidance in the SPD. SPDs must follow policy and the SPD will be reviewed if necessary following adoption of the LPDMP.</p> <p>D12 is necessary as in practice some applicants appear not to have applied some elements of D2, such as the energy hierarchy, in their initial proposals. This has resulted in delays and revisions during the planning process, and in some cases schemes have been refused. Policy D12</p>

		<p>makes the requirements more clear and will therefore improve the planning process.</p>
Left blank	<p>A simple approach would be for the policy to state that the requirement for carbon emissions reduction and efficiency of buildings should be in accordance with the latest Building Regulations. This is the best mechanism for securing future changes in the interest of transparency and consistency. The Government is committed to a net zero policy and so Building Regulations are likely to alter overtime, but this is subject to wide consultation and transparent lead in times. This helps the development industry in preparing and reduces uncertainty based on location in this respect.</p>	<p>The issue of compliance with Building Regulations emissions standards is addressed against Policy D14.</p> <p>Regarding efficiency, the minimum fabric efficiencies (maximum u-values) set out in the Building Regulations that will enter into force in June 2022 are not stringent (they are 'limiting values' and are supposed to represent worst case scenarios) and as a result there is still benefit in including the fabric first requirement in Policy D12 (1).</p>
Left blank	<b>Thakeham Homes</b>	Left blank
Policy para 2	<p>Part 2 (b) requires development proposals to demonstrate that embodied carbon emissions have been minimised through sourcing materials locally and taking account of the embodied carbon emissions of materials. There is no further detail regarding the targets which are to be achieved or how this will be implemented through the planning process. Therefore, this part of the policy is meaningless unless further clarity is provided on what is required.</p>	<p>The policy and supporting text set out the need to assess the carbon content of selected materials against a respected materials rating database. Two such databases are listed the supporting text. While the policy does not include a qualitative standard or target for embodied carbon, the provision of this information by applicants will allow decision makers to undertake a qualitative assessment of whether schemes have sought to reduce embodied carbon in new materials. Evidence showing that applicants have considered embodied carbon should be included in their sustainability statements (major development) or sustainability information (minor development).</p>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank



Left blank	The policy should include reference to GBC declaration of a Climate Change Emergency.	There is a reference to the climate emergency declaration in the introduction at paragraph 5.189 to provide context for the policy. Including it in the policy itself would have no effect.
Left blank	Include the lost embodied energy in any proposal for building demolition.	Paragraph 3 of the policy “expects developments to consider the lifecycle of buildings and public spaces, including how they can be adapted and modified” which would include considering the embodied carbon cost of the adaptation and demolition of existing buildings.
Left blank	Addressing the profligate energy and materials consumption in large new houses – suggest the banning of new homes above 200sqm floorspace and the provision of new private swimming pools, resist open plan homes to ensure that only that part of the building in use need be heated, give preference to three storey and part terraced houses because of their efficiency in energy and materials consumption	Blanket restrictions on house sizes, prohibition of private swimming pools and the mandating internal layouts would not be justified. In terms of the presumption in favour of sustainable development – A scheme with larger homes, like all development, must be considered on its merits and against the policies in the development plan and other material considerations.  Existing policy (LPSS Policy D2 (1) ©) requires schemes to be designed to minimise energy use including through the use of massing and layout. This requirement favours energy efficiency building forms like terraces.
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	The policy is ineffective. This policy should be deleted as it is not necessary or consistent with National Planning Policy as stated in paragraph 35 and 16e) of the NPPF.	The Climate Change and Sustainable Development topic paper sets out a justification for including the policy and how it complies with the NPPF. The NPPF requires the planning system to support the transition to a low carbon future, contribute to radical reductions in carbon emissions, and encourage the reuse of resources and existing buildings (paragraph 152) which are matters that the policy directly

		addresses. Paragraph 153 directs plans to take a proactive approach to mitigating climate change, which means reducing carbon emissions, and take account of long-term implications for water supply. Alongside this, the NPPF throughout promotes sustainable development, which Policy D12 is aligned with by seeking to reduce the environmental impact of new development.
Left blank	Object to this policy on the basis that it is not required and duplicates on matters that are covered by guidance specifically intended to cover this matter. The policy should be altered to refer to the Climate Change, Sustainable Design, Construction and Energy Supplementary Planning Document (adopted 22 September 2020). It is essential that this SPD and the DMP document are aligned. However, the SPD should contain the detail on these areas and there is no need to repeat the same information in the DMP.	<p>LPSS Policy D2 is a strategic policy. D12 adds detail to D2 in order to improve implementation e.g. where Policy D2 implements the energy and waste hierarchies, D12 clarifies that the energy hierarchy requires a ‘fabric first’ approach and requires major developments to implement Site Waste Management Plans to manage waste sustainably.</p> <p>D12 also reinforces some of the guidance in the Climate Change, Sustainable Design, Construction and Energy SPD: while embodied carbon is already covered by the overarching requirement in policy D2 (1) to incorporate sustainable design and construction practice, policy D12 makes consideration of embodied carbon an explicit requirement, which reinforces the relevant guidance in the SPD. SPDs must follow policy and the SPD will be reviewed if necessary following adoption of the LPDMP.</p> <p>D12 is necessary as in practice some applicants appear not to have applied some elements of D2, such as the energy hierarchy, in their initial proposals. This has resulted in delays and revisions during the planning process, and in some cases schemes have been refused. Policy D12 makes the requirements more clear and will therefore improve the planning process.</p>
Left blank	The basis of this policy should have been tested in the LPSS.	The new plan has been subject to viability testing.

	It is also essential that GBC consider the viability of developments to ensure that the GBC housing trajectory is not compromised by making developments undeliverable.	
Policy para 6	<p>Given draft Policy D12 contains similar provisions as set out in the SPD, if GBC are minded to include this policy, TW do not have any specific comments on the wording other than in part 6 amending 'possible' to 'appropriate' as per the below (strikethrough wording should be removed and red text should be added):</p> <p><i>New developments are expected to incorporate measures to harvest rainwater and conserve water resources and, where appropriate <del>possible</del> water recycling/reuse systems.</i></p>	<p>Guildford borough is in an area classified as under 'serious' water stress and is one of the most water stressed regions in Europe. Therefore, there are unlikely to be instances where water reuse and recycling is possible but not appropriate – if it is feasible and viable it should be delivered.</p>
Left blank	<b>Guildford Society</b>	Left blank
Left blank	Should the notes have clear mention of standards such as Passivhaus as standards to be aimed at?	<p>Passivhaus is one of a number of approaches to delivering low carbon and/or energy efficient development and it is not considered appropriate to single out one approach. However, LPSS Policy D2 (1) offers strong support for zero carbon development and LPDMP policy D14 (5) strongly encourages exceeding the minimum standards set out in the policy.</p>
Policy para 3	Does this need to encompass all developments?	<p>The requirement to consider the lifecycle of buildings and public spaces is most relevant for major developments where specialist uses, such as purpose built student accommodation, may need to be adaptable to take account of changing study patterns. It would be disproportionate to apply the requirement to minor developments.</p>

Left blank	Should it be noted that off-site fabrication is encouraged if it lowers impact of building work?	Off-site fabrication is encouraged through LPSS policy D2 and Policy D12 as it entails low levels of construction waste and can result in energy efficient buildings, both of which are policy outcomes..
Left blank	<p>The Policy should refer to the adaptability in buildings. The era of rebuilding every 60 years may be coming to an end and buildings will need to adapt by reconfiguration to new uses and occupants.</p> <p>Suggested new policy clause (new para 4):</p> <p>“Adaptability Proposals for Development should consider how basic Building Structures can handle changing requirements over time e.g. Mixed Use development may need accommodate varying proportions of Commercial vs. Dwelling space”</p>	Policy paragraph 3 covers this where it addresses lifecycle of buildings and public spaces. The supporting text sets out that this should include consideration of adaptability.
Policy para 4	<p>Energy efficient heating etc can have design impacts e.g. Air Source Heating Heat Exchangers this policy need to cross refer to D4 on Design?</p> <p>Suggested addition to para 4:</p> <p>“Environmental Technology e.g. Air Source Heating, PV Cells can have a considerable impact on the look of a building and this must be considered to conform to Policy D4.”</p>	The plan is read as a whole and cross-reference to policy D4 is not necessary. The location of plant for building services is already a consideration in the planning decision making process and is addressed by Policy D5 (1) (b) which requires the visual impact of external servicing features to be minimised.
Left blank	<b>Guildford Residents’ Association</b>	Left blank
Policy para 2	<p>In the para on embodied carbon, para 2, insert:</p> <p>2) Development proposals are required to demonstrate that embodied carbon emissions have been minimised by: ...</p>	Paragraph 3 of the policy “expects developments to consider the lifecycle of buildings and public spaces, including how they can be adapted and modified” which

	<p>b) taking into account the embodied carbon emissions of materials based on information provided in a respected materials rating database, <b><u>including where relevant the option of adaptation of an existing building with its embodied carbon.</u></b></p>	<p>would include considering the embodied carbon cost of the adaptation and demolition of existing buildings.</p>
Policy para 3	<p>The introduction makes welcome reference to the desirability of buildings being designed to have a long useful life. This is of such importance for sustainable development and reducing carbon emissions that para 3) should be amended to require all development to consider longevity [not only major developments].</p>	<p>The requirement to consider the lifecycle of buildings and public spaces is most relevant for major developments where specialist uses, such as purpose-built student accommodation, may need to be adaptable to take account of changing study patterns. This is unlikely to be considered reasonable for minor or householder developments, e.g. developments of 9 homes or fewer, small commercial developments or extensions.</p>
Left blank	<p>This policy should place carbon emission reduction in the context of sustainable development. This will be important, for example, in guiding decisions relating to old buildings. Some older buildings of value will be irreplaceable assets in a sustainable development context and appreciation of this will be important in making informed decisions about the relative merits of adapting or replacing any such buildings.</p>	<p>The plan is read as a whole and protects buildings that are important for heritage reasons. Planning decision makers will balance the need to protect and enhance heritage assets and the natural environment.</p>
Left blank	<p><b>Martin Grant Homes</b></p>	<p>Left blank</p>
Policy para 4	<p>Part 4) sets out that improvements to existing buildings to a level significantly better than current standards for new buildings is encouraged. In our view, having regard to the potential challenges of retrofitting buildings, improvements which bring existing buildings in line with the standards stated in Policy D14 or at a national level, or as close to these standards as possible, should also be encouraged as this could have a marked impact on carbon emissions. As such,</p>	<p>Where a building undergoes a change of use (e.g. from commercial to residential) the building regulations often require upgrades to the building to make it acceptable for its new use. There is an aspiration for changes of use and refurbishment development to take the available opportunity to deliver upgrades that are better than the minimum required standard. As a result of this, the policy reserves</p>

	we recommend Part 4) is amended as follows: “Development proposals that will improve the energy efficiency and carbon emission rate of existing buildings are encouraged.”	support for those that deliver improvements that are significantly better than the required standard. . However, .
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	The whole-life environmental impact of new and existing buildings should be considered. Where a building is undergoing change of use, for example the Debenhams building, the carbon footprint could be reduced by reusing as much as possible the existing fabric of the building already on the site.	Policy D12 (5) where it addresses waste, encourages the reuse of demolition material in the new construction. LPSS Policy D2 (1) (a) and (b) directly require the reuse of demolition material. The policy at paragraph 3 “expects developments to consider the lifecycle of buildings and public spaces, including how they can be adapted and modified” which would include considering the embodied carbon cost of the adaptation and demolition of existing buildings.

### Other respondents

Paragraph	Main Issue Summary	GBC Response
Policy para 1-6	Whilst Policy D12: Sustainable and Low Impact Development 1-6) requires development proposals to demonstrate how they have followed a ‘fabric first’ approach and to demonstrate a ‘minimising of embodied emissions’ there is no reference to the selection of materials suited to reducing life time waste of developments. A reduction of ‘Lifetime waste’ in building design (eg. the use of natural building materials) CONSIDERABLY reduces a building’s overall carbon	Not all natural building materials are sustainable (for example, limestone paving, peat and primary aggregates) and some artificial materials should be considered low waste, such as composite roof tiles composed of recycled aggregate or steel frames that can be reused or recycled post demolition.  The use of timber in construction results in the sequestration of formerly atmospheric carbon within the

	<p>reduction by sequestration and long term waste (eg. land fill). Perhaps this could be included to this policy.</p>	<p>building and this benefit is acknowledged in the Climate Change, Sustainable Design and Construction SPD and can be accorded weight in planning decisions.</p>
<p>Left blank</p>	<p>The reply to points that I made under the Reg18 consultation concerning carbon costs was that they were too strict and would be considered unreasonable. However, it is becoming increasingly clear that if we are to protect younger and future generations then strict measures are necessary – especially in the realm of planning which cannot be regarded as exempt from the Climate Change Emergency (nationally and locally). Construction is a major source of upfront emissions and ongoing emissions are not the only issue. GBC has an opportunity to lead the way on this and it could encourage residents to do likewise.</p>	<p>The Regulation 18 comment referred to is summarised as follows:</p> <p>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.</p> <p>The principle set out in the Regulation 19 comment is acknowledged, however the local plan must operate within the existing planning system and that means that policies will undergo a test of reasonableness. Much of the requested assessment falls outside the scope of planning policy (for example, The potential for carbon sequestration on undeveloped land is subject to the behaviour of the current landowner and cannot be governed by planning unless change of use is sought.</p>

## Policy D13: Climate Change Adaptation

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	Support the policy.	Left blank

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	<p>West Horsley Parish Council have noted the response to our comments for Regulation 18. However, with particular reference to the element of flooding we are still extremely concerned that the LLFA continue to fail to recognise that surface water levels have significantly increased over the last 4/5 years in this village and the surrounding area. Flood maps are out of date and there is NO assessment of how surface water and sewage overflow will be managed from the cumulative impact of local developments/allocated sites in West and East Horsley. Indeed developers on two recent occasions have worked with the EA and LLFA to agree to new maps based on the developer's modelling have been accepted for two allocated sites in West/East Horsley. This cannot be allowed. Little acknowledgment has been taken of residents submissions of objection</p>	<p>Flood maps and agreements with the LLFA and EA regarding developments are beyond the scope of this policy.</p> <p>Policy P13, referenced at para 5.235 under Policy D13, provides greater detail on the use of SuDS and where they are appropriate. .</p>



with respect to these sites, yet they have lived here for years and have witnessed the changes.

The usual reliance on attenuation ponds must be challenged - this is the least sustainable option to prevent pollution and environmental damage.

Developers should be encouraged to use green roofs for example, a far more sustainable option.

Policy P13 sets out a discharge hierarchy and SuDS sustainability hierarchy. Attenuation ponds fall at the top of the SuDS sustainability hierarchy as they provide three types of benefits: flood reduction (water management), pollution reduction (water quality) and wildlife/landscape benefits (biodiversity). They also provide amenity benefits.

Green Roofs are also at the top of the hierarchy and therefore would be favoured by Policy P13.

The discharge hierarchy favours infiltration over discharge to a waterbody and discharge to sewer. As a result, the overall benefit of green roofs and attenuation ponds will depend on where the intercepted water is eventually discharged.

Surrey County Council also refer to the [Water. People. Places. Guidance document](#) which provides guidance of how SuDS (including ponds) can be designed to deliver local biodiversity aims and allow communities to derive amenity value from them. Under the proposed biodiversity policies, ponds would be expected to be designed to support biodiversity, and where they provide permanent standing water the habitat could be of high value (see paragraph 4.81 under policy P8/P9 for the importance of standing water).

		Policy P13 provides greater detail on the use of SuDS and where they are appropriate.
Left blank	<b>Guildford Greenbelt Group</b>	Left blank
Left blank	<p>Recommend stronger emphasis is given to the types of landscape and roof schemes that help to reduce surface water flooding. We need to look at any opportunity to slow down and absorb increased rainfall through the requirement to include green roofs in building design e.g., on garages. This would all help towards the natural cooling of buildings.</p>	<p>Policy P13, referenced at para 5.235 under Policy D13, provides greater detail on the use of SuDS and where they are appropriate.</p> <p>Regarding the natural cooling of buildings, Policy D13 already refers to the need to demonstrate how new buildings will incorporate passive heat control measures, and the exclusion of conventional air conditioning, in line with the cooling hierarchy.</p> <p>Beyond the hierarchy approaches (e.g. SUDS sustainability as per Policy P13 and cooling as per Policy D13) included in the LPDMP policies, it is considered unnecessary to place greater emphasis on some measures than others. Landscape and roof schemes would already be located favourably in accordance with these hierarchies.</p>

<p>Left blank</p>	<p>There is too much reliance by developers to deliver attenuation ponds which are at the bottom end of the SuDS hierarchy and achieve no environmental benefit.</p>	<p>Policy P13 sets out a discharge hierarchy and SuDS sustainability hierarchy. Attenuation ponds fall at the top of the SuDS sustainability hierarchy as they provide three types of benefits: flood reduction (water management), pollution reduction (water quality) and wildlife/landscape benefits (biodiversity). They also provide amenity benefits.</p> <p>Green Roofs are also at the top of the hierarchy and therefore would be favoured by Policy P13.</p> <p>The discharge hierarchy favours infiltration over discharge to a waterbody and discharge to sewer. As a result, the overall benefit of green roofs and attenuation ponds will depend on where the intercepted water is eventually discharged.</p> <p>Surrey County Council also refer to the <u>Water. People. Places. Guidance document</u> which provides guidance of how SuDS (including ponds) can be designed to deliver local biodiversity aims and allow communities to derive amenity value from them. Under the proposed biodiversity policies, ponds would be expected to be designed to support biodiversity, and where they provide permanent standing water the habitat could be of high value (see paragraph 4.81 under policy P8/P9 for the importance of standing water).</p>
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		Policy P13 provides greater detail on the use of SuDS and where they are appropriate..
Left blank	Our homes must be 'future proofed' and GBC must be encouraging more innovative and climate friendly designs, without relying on whether or not the scheme is 'viable'.	<p>Policy D13 includes requirements in relation to ensuring that buildings and open spaces are designed to be adapted and adaptable for future climate and weather conditions.</p> <p>Viability concerns should not result in poor quality design. In line with national policy and guidance, the Local Plan has been subject to viability testing and the proposed policies have been found to be suitable in viability terms and will not undermine the deliverability of the Local Plan.</p>
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	The document makes no comment on the use of cars which collectively are the most significant emitters of all. In Effingham, we want to create cycle paths to promote healthy lifestyles and reduce reliance on cars, for instance a cycleway from the village to the station along Effingham Common Road. We consider that GBC needs to do far more in this area and that its proposed policy document pays inadequate attention to this important area.	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, furthermore, Policy ID10 provides further detail regarding the cycle network and it is not considered necessary to cross-reference.

Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	Support but have concerns over the practical implications encompassed by the policy. We recommend additional wording to require the policy to be applied realistically and proportionately.	All policies in the Local Plan carry equal weight and will be applied by the planning decision maker on a case-by-case basis. It is not considered necessary to caveat “realistically and proportionately” in the policy as the planning process allows for consideration of appropriateness.
Left blank	<b>Bloor Homes</b>	Left blank
Left blank	Object - this policy overlaps and repeats the LPSS and Climate Change, Sustainable Design, Construction and Energy SPD. The policy should be deleted.	The primary purpose of Policy D13 is to make clearer the scope of LPSS Policy D2 (4) by setting out the specific issues that must be considered in applicant’s sustainability statements, which are not currently covered by adopted policy. This clarity will also make it clearer for decision makers whether climate change adaptation has been adequately addressed and ensure a smoother planning process.  The SPD forms guidance and will be updated if and when new policy is adopted and amendments are necessary.
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	<b>TW object to this policy on the basis that it is not required and duplicates on matters that are covered by guidance specifically intended to cover</b>	The primary purpose of Policy D13 is to make clearer the scope of LPSS Policy D2 (4) by setting out the specific issues that

	<p><b>this matter. This is not in line with national policy, as stated in paragraph 35 and 16e) of the NPPF.</b></p> <p>This policy does not require anything more or new compared to the Climate Change, Sustainable Design, Construction and Energy SPD. Planning applications should be considered against other relevant policies in the LPSS and to rely on guidance in adopted SPDs, the NPPF and Planning Practice Guidance.</p> <p>If GBC are minded to retain the policy, the following minor amendments are suggested:</p>	<p>must be considered in applicant's sustainability statements, which are not currently covered by adopted policy. This clarity will also make it clearer for decision makers whether climate change adaptation has been adequately addressed and ensure a smoother planning process.</p> <p>The SPD forms guidance, not policy, and will be updated if and when new policy is adopted and amendments are necessary.</p>
<p>Policy para 1</p>	<p><i>Development proposals are required to demonstrate how new buildings will: ...</i></p> <p><i>b) incorporate passive heat control measures, and the exclusion of conventional air conditioning, in line with the cooling hierarchy, <u>where appropriate</u>...</i></p>	<p>Overheating is well understood to be a key issue for the South East of England. At the same time, it is recognised that improving energy efficiency is key to meeting climate change mitigation targets, which means designing out energy use wherever possible. As a result, there will be very limited circumstances where it would be inappropriate not to follow the cooling hierarchy. The planning process includes sufficient flexibility for those circumstances..</p>
<p>Policy para 4</p>	<p><i>Development proposals are required to demonstrate adaptation for more frequent and severe rainfall events through measures including:</i></p> <p><i>a) retaining existing and incorporating new water bodies;</i></p> <p><i>b) designing planting and landscaping schemes to absorb and slow down surface water; and</i></p> <p><i>c) the use of permeable ground surfaces wherever <u>appropriate possible</u>.</i></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>

Left blank	<b>Guildford Residents' Association</b>	Left blank
Policy para 3c	Delete "as far as possible".	The use of 'as far as possible' sets a high bar in terms of retaining and incorporating green and blue infrastructure

### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	<p>Suggest that Policy D13: Climate Change Adaptation 4) Development proposals are required to demonstrate adaptation for more frequent and severe rainfall events through measures including: b) designing planting, landscaping <b>and roof structure schemes</b> to absorb and slow down surface water;</p> <p>Roof structure schemes that incorporate biodiverse green roofs both absorb a percentage of rainfall along with 'naturally cooling' the interior of the dwelling in times of high temperatures due to the substrate/earth and planting utilised. An effective passive heat control measure.</p>	<p>The proposed addition is considered unnecessary. The list of measures in paragraph 4 is not a closed list. Policy P13, referenced at para 5.235 under Policy D13, provides greater detail on the use of SuDS, which includes the SuDS hierarchy which favours green roofs.</p>

## Policy D14: Carbon Emissions from Buildings

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	Support the policy.	Left blank

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Hallam Land Management</b>	Left blank
Policy para 4	<p>The policy proposes that all new dwellings must achieve a reduction in carbon emissions of at least 31% compared to the existing targets in the Building Regulations.</p> <p>The Building Regulations is expected to introduce this requirement in 2025. This policy duplicates the requirements set out in the Building Regulations, is unsound and should be deleted.</p> <p>There is a risk that should this local policy be adopted it becomes outdated with any updates to the national</p>	<p>The 31% improvement on carbon emission standards for new homes will be introduced nationally in Building Regulations in June 2022 as an interim step towards Future Homes in 2025 which is proposed to see a further uplift on Part L standards and an end to gas heating.</p> <p>The Regulation 19 version of the policy included carbon emissions standards equal to the then proposed national Building Regulations standards because the Council is mindful that the improvement will enter into force during the plan period (now scheduled for June 2022) and therefore built the</p>



	<p>Building Regulations, therefore this policy is at risk of conflicting with national standards.</p> <p>The Government is introducing standards for carbon emissions through the Building Regulations; therefore, this policy should be deleted, and this matter controlled through national policy.</p>	<p>expected consequential uplift on build costs into the viability testing of the plan. One of the roles of the planning system is to seek public benefit from private development and the Council's view is that reducing carbon emissions from new buildings is a significant public benefit as it will mitigate climate change and indirectly reduce fuel poverty and improve air quality. The introduction of the new standards was confirmed in February 2022 (after the Regulation 19 consultation had begun) and as a result it is no longer necessary to include the specific percentage uplift on the TER in the policy. A minor modification is proposed to instead refer to Building Regulations standards.</p> <p>It is not agreed that the policy should be deleted. The policy includes amendments to LPSS policy D2 that brings the local plan into line with national policy regarding low carbon heat networks, and also includes encouragement for better carbon emission standards, which is positive. As a result, deleting the policy would not be beneficial.</p>
Left blank	<p>In accordance with the National Planning Policy Guidance (Paragraph: 009 Reference ID: 6-009-20150327) local planning authorities when setting any local requirements for a building's sustainability should do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards.</p>	<p>Local Planning Authorities are legally empowered to set standards for energy efficiency and low carbon energy in new developments through the Planning and Energy Act 2008, and the government's intention is that this power will remain in place. See the Climate Change and Sustainable Development Topic Paper para 3.20 for more information.</p>
Left blank	<b>West Horsley Parish Council</b>	Left blank
Policy para 4	<p>West Horsley Parish Council welcome the increased requirement for a 31% reduction in carbon emissions, but believe that to 'future proof' new homes, this should be increased to 40%. The Climate Emergency is real, and developers must accept that they have a major part to play</p>	<p>The Council considered whether to implement carbon emissions standards that were more demanding than the standards in the government's then proposed uplift (now confirmed for June 2022) which are the same as the standards proposed in the Regulation 19 version of the policy. The</p>

	<p>in this, given that construction contributes significantly to this.</p> <p>We remain concerned that allocated site approved developments are still being allowed where the total reliance is on the installation of gas boilers. This amounts to some 400 plus homes across West and East Horsley, all gas boilers.</p>	<p>Council has tested the increase on build costs that would result from improving emissions rates by 25%, 30% and 35% over 2013 Building Regulations standards (the extant standards) for a range of building types. The data shows that the costs increase significantly when carbon reductions increase from 30% to 35%, and the viability testing shows that this uplift on build costs, along with the wide range and significant impact of other development and policy costs, may jeopardise the viability of some schemes. As a result, the viability study recommends not requiring carbon emission standards higher than the June 2022 national standards at this point.</p> <p>As well as improving the maximum carbon emission standards, the changes in June 2022 mean that new buildings will be designed to accommodate low carbon heating systems, and gas fired heating is proposed to end through the introduction of the 'Future Homes' and 'Future Buildings' standards from 2025. In February 2022 (after the Regulation 19 consultation had begun) the government confirmed that the new carbon emission standards would be introduced in June 2022 (ahead of adoption of the LPDMP), and as a result a minor modification to the policy is proposed so that the policy refers to Building Regulations standards, rather than carbon reductions against a baseline of 2013 Building Regulations standards, as these now achieve the same standard.</p>
Left blank	<p>Developers should be required to install the necessary infrastructure at the start of building that would provide future residents with an element of choice that is more cost effective and sustainable.</p> <p>The policy needs provision that ensures developers are required to install the appropriate infrastructure to enable</p>	<p>The changes to Building Regulations that are now scheduled for June 2022 will require developments to install heating infrastructure that is suitable for low temperature heating technologies, like heat pumps.</p>

	the most sustainable options for heating and cooling are deliverable for the lifetime of the development.	
Left blank	<b>Guildford Greenbelt Group</b>	Left blank
Policy para 4	Request that within the policy it states that standards may be raised in line with future changes and demands from national policy and building regulations - so whichever is the higher figure. GBC has done this for Biodiversity net gain and MUST do this for Climate Change as both are critical to the preservation of our life and our environment.	A minor amendment has been proposed which aligns the policy with the national standards set out in the Building Regulations.
Policy para 4	As there is growing recognition that the targets of net zero, zero carbon, or whatever you want to call it may not be achieved in time, Government policy is likely (hopefully) to have to respond quicker, so GBC must future proof their policies. GGG would like to see the % reduction for carbon emissions increased from 31% to 40% which we believe will force developers to make changes. Somebody has got to be brave and make a start with this as the construction industry is one of the biggest emitters of carbon.	The Council considered whether to implement carbon emissions standards that were more demanding than the government's proposed uplift (now confirmed for June 2022), which are the same as the standards proposed in the Regulation 19 version of the policy. The Council has tested the increase on build costs that would result from improving emissions rates by 25%, 30% and 35% over 2013 Building Regulations standards (the extant standards) for a range of building types. The data shows that the costs increase significantly when carbon reductions increase from 30% to 35%, and the viability testing shows that this uplift on build costs, along with the wide range and significant impact of other development and policy costs, may jeopardise the viability of some schemes. As a result, the viability study recommends not requiring carbon emission standards higher than the June 2022 national standards at this point. As well as improving the maximum carbon emission standards, the changes in June 2022 mean that new buildings will be designed to accommodate low carbon heating systems, and gas fired heating is proposed to end through the introduction of the 'Future Homes' and 'Future Buildings' standards from 2025. In February 2022 (after the Regulation 19 consultation had

		<p>begun) the government confirmed that the new carbon emission standards would be introduced in June 2022 (ahead of adoption of the LPDMP), and as a result a minor modification to the policy is proposed so that the policy refers to Building Regulations standards, rather than carbon reductions against a baseline of 2013 Building Regulations standards, as these now achieve the same standard.</p>
Left blank	<p>The policy should be encouraging applicants/developers to put forward the most sustainable technical solutions and infrastructure that will lower carbon emissions.</p>	<p>Policy paragraph 5 states “Development proposals are strongly encouraged to improve upon the standards in paragraph 4.”</p>
Left blank	<p>At 5.243 it would help to put the statement 'the carbon emission standard applies to each new building individually'.</p>	<p>This suggested sentence was already at 5.243 but a minor modification has been proposed to remove this wording alongside a minor modification to alter the policy to require adherence to building regulations emissions standards rather than carbon reductions against 2013 standards. This was made following the government’s confirmation in February 2022 that the standards set out in policy will become the new national standards in June 2022.</p>
Left blank	<p><b>Blackwell Park Ltd</b></p>	Left blank
Policy para 5	<p>The policy also includes strong encouragement to improve on the standards in the Building Regulations Part L. Our client supports that the latest national standards must be met, and acknowledges the encouragement provided to go beyond this, and the reasons for it.</p> <p>However, in some instances going beyond required national standards can mean additional development costs that may mean that some other elements must be cut back.</p>	<p>This point is noted. The application of planning policy in decision making is a governance issue and not a matter for the Local Plan.</p> <p><i>The word “encourage” is used in line with the word’s common meaning. It is not an expectation, where an acceptable justification would be needed for not meeting the standard, or a requirement, which must be met and to not do so could be considered a reason for refusal of an application.</i></p>

	<p>Whilst the policy 'encourages' but does not 'require', it is important to be clear that this does not become interpreted as a requirement if the policy is adopted in this form, and that expectations are managed accordingly.</p>	
Left blank	<b>Homebuilders Federation</b>	Left blank
Policy para 4	<p>The policy is unsound as it repeats national policy.</p> <p>Policy D14 proposes that all new dwellings must achieve a reduction in carbon emissions of at least 31% compared to targets in the 2013 building regulations. The HBF supports the Government's phased approach we also consider it important that this is achieved through the Building Regulations and that it is unnecessary for local plans to seek to repeat national mandatory standards.</p> <p>Seeking to replicate such a standard in a local plan can create confusion for decision makers and applicants as to the standard that should be applied. In this case the situation is further confused given that the proposed changes to Building Regulations now being proposed by Government would lead to a 27% reduction in CO2 on current building regulations. Given this shift to securing improvements in energy efficiency through mandatory building regulations which will be introduced in the summer of 2022 we would suggest that policy D14 is unnecessary and should be deleted.</p>	<p>The Regulation 19 version of the policy included carbon emissions standards equal to the then proposed national Building Regulations standards because the Council is mindful that the improvement will enter into force during the plan period (now scheduled for June 2022) and therefore built the expected consequential uplift on build costs into the viability testing of the plan. One of the roles of the planning system is to seek public benefit from private development and the Council's view is that reducing carbon emissions from new buildings is a significant public benefit as it will mitigate climate change and indirectly reduce fuel poverty and improve air quality. The introduction of the new standards was confirmed in February 2022 (after the Regulation 19 consultation had begun) and as a result it is no longer necessary to include the specific percentage uplift on the TER in the policy. A minor modification is proposed to instead refer to Building Regulations standards.</p> <p>The 27% carbon reduction mentioned by the respondent refers to non-residential buildings only. Policy D14 was consistent with this standard for non-residential buildings.</p> <p>The policy includes amendments to LPSS policy D2 that brings the LPSS into line with national policy regarding low carbon heat networks and carbon emission standards, and also includes encouragement for better carbon emission standards, which is positive. As a result, deleting the policy would not be beneficial.</p>

Left blank	<b>Martin Grant Homes</b>	Left blank
Policy para 4	We note that the standards proposed in Part 4) are taken from the forthcoming changes to Building Regulations, as noted in paragraph 5.240 of the supporting text. To ensure consistency with adopted Building Regulations, which may be subject to change over time, we suggest that Policy D14 sets out that 'new buildings must achieve a reduction in carbon emissions in line with the standards set out in current Building Regulations'.	A minor modification has been proposed to amend the policy to refer to building regulations standards rather than carbon reductions against the 2013 national standards. This was made following the government's confirmation in February 2022 that the standards set out in policy would become the new national standards in June 2022.
Left blank	To provide clarity, we recommend that the SAP assessment methodology and carbon emission factors to be used in assessing reductions in carbon emissions should be specified within the policy or supporting text.	At time of writing, the final version of SAP for use in June 2022 is not set and the software is not available so these details cannot be confirmed at this point. However, the policy will be assessed against the methodology and emission factors that are used in the building control process at the time. It is important that the policy aligns with the methodology used in the building control process in order to avoid applicants having to produce multiple sets of SAP assessments using different methodologies and emission factors.
Left blank	<b>Blackwell Park Ltd and University of Surrey</b>	Left blank
Policy para 5	The policy also includes strong encouragement to improve on the standards in the Building Regulations Part L. Our client supports that the latest national standards must be met, and acknowledges the encouragement provided to go beyond this, and the reasons for it.  However, in some instances going beyond required national standards can mean additional development costs that may mean that some other elements must be cut back.	This point is noted. The application of planning policy in decision making is a governance issue and not a matter for the Local Plan.  The word "encourage" is used in line with the word's common meaning. It is not an expectation, where an acceptable justification would be needed for not meeting the standard, or a requirement, which must be met and to not do so could be considered a reason for refusal of an application..

	<p>Whilst the policy 'encourages' but does not 'require', it is important to be clear that this does not become interpreted as a requirement if the policy is adopted in this form, and that expectations are managed accordingly.</p>	
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	<p>This policy is of its 'time', and next year may be superseded. The wording of the policy should be rewritten to ensure it remains future proofed.</p>	<p>The building regulations are now confirmed to change in June 2022 and the policy aligns with the new standards. If standards are improved beyond the policy standards, the higher Building Regulation standard would take precedence.</p>
Left blank	<b>Bloor Homes</b>	Left blank
Policy para 4	<p>Object - this policy introduces a requirement for new dwellings to demonstrate a reduction in carbon emissions by 31%. This is a considerable increase compared to the requirements in Policy D2 of the LPSS (which requires 20%).</p> <p>Whilst the supporting text of Policy D14 refers to new national standards proposed by government in the forthcoming changes of Building Regulations. At the time of writing, the requirement is not part of the Building Regulations and instead is only part of a government consultation.</p> <p>On this basis it is subject to change, and so Bloor Homes does not consider it appropriate for GBC to introduce such an increase in carbon emission reduction targets at a local level. This would have repercussions on the viability of new development and would not allow Bloor Homes to adapt and innovate in line with the trajectory of national standards.</p>	<p>The Regulation 19 version of the policy included carbon emissions standards equal to the then proposed national Building Regulations standards because the Council is mindful that the improvement will enter into force during the plan period (now scheduled for June 2022) and therefore built the expected consequential uplift on build costs into the viability testing of the plan. One of the roles of the planning system is to seek public benefit from private development and the Council's view is that reducing carbon emissions from new buildings is a significant public benefit as it will mitigate climate change and indirectly reduce fuel poverty and improve air quality. The introduction of the new standards was confirmed in February 2022 (after the Regulation 19 consultation had begun) and as a result it is no longer necessary to include the specific percentage uplift on the TER in the policy. A minor modification is proposed to instead refer to Building Regulations standards.</p>

	<p>Bloor Homes is committed to sustainable construction and its role in tackling climate change. However, the carbon emission reduction targets need to be applied in a way that ensures construction techniques can adapt and innovate with sufficient time for this to take place.</p> <p>It is more appropriate for GBC to adopt the increase in targets set by Government via the Building Regulations, as it is subject to much wider industry consultation on a national scale.</p> <p>Policy D14 and in particular Part 4 should be deleted.</p>	<p>To clarify regarding the last point, the policy does adopt the increase in targets set by Government via the Building Regulations.</p>
Policy para 4	<p>GBC commissioned Local Plan Local Plan: Development Management Policies &amp; Stage 1 Community Infrastructure Levy (CIL) Viability Assessment December 2021 by Dixon Searle Partnership, recognises the increased burden to costs in respect of GBC's proposal to go beyond national standards. Rather than the report suggesting the Policy is removed, it suggests that any future CIL levy should be applied to take account of such additional costs. It also suggests that further testing is required for other typologies to fully understand the viability impact of the policy (paragraph 3.1.14)</p>	<p>The study at 3.1.14 states "Although this early testing indicated that an increased level of carbon reduction (at 35%) is potentially supportable, we noted a need to undertake further testing on different typologies in order to more fully understand the potential viability impact." However, this wording is included to document the process and the study then goes on to test different typologies (see the appendices).</p> <p>The study appropriately considers the impact on viability of the obligations that would result from the LPDMP and then proposes a CIL rate accordingly.</p>
Policy para 4	<p>The Policy would also result in an inconsistency with Policy D2 of the LPSS, which whilst referring to a 20% reduction in carbon emissions does allow for the minimum requirement to change subject to Building Regulations. This is considered to be appropriate.</p>	<p>Appendix D of the LPDMP includes a schedule of superseded policies and states that sections of Policy D2 will be superseded by Policy D14, including the 20% carbon reduction.</p>
Left blank	<b>Thakeham Homes</b>	Left blank



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The Council should prioritise a policy that sets a minimum proportion of carbon reduction by improvements to a building's fabric, as this lasts the lifetime of building, opposed to the lifespan of on-site renewable technology. Thakeham does however recognise that improvements to building fabric can only go so far.

Based on our experience, the Council should target a 31% improvement on Part L in order to future proof the policy and make it in line with emerging 'Future Homes Standard' which is the next step in Part L of Building Regulations. Thakeham is of the opinion that it will be feasible for developers to meet this solely through Fabric First improvements, therefore the minimum proportion of carbon reduction by improvements to a building's fabric should be 31%.

The Council considered whether to implement carbon emissions standards that were more demanding than the government's proposed uplift (now confirmed for June 2022) which are the same as the standards proposed in the Regulation 19 version of the policy. The Council has tested the increase on build costs that would result from improving emissions rates by 25%, 30% and 35% over 2013 Building Regulations standards (the extant standards) for a range of building types. The data shows that the costs increase significantly when improvements increase from 30% to 35%, and the viability testing shows that this uplift on build costs, along with the wide range and significant impact of other development and policy costs, may jeopardise the viability of some schemes. As a result, the viability study recommends not requiring carbon emission standards higher than the June 2022 national standards at this point. As well as improving the maximum carbon emission standards, the changes in June 2022 mean that new buildings will be designed to accommodate low carbon heating systems, and gas fired heating is proposed to end through the introduction of the 'Future Homes' and 'Future Buildings' standards from 2025. In February 2022 (after the Regulation 19 consultation had begun) the government confirmed that the new carbon emission standards would be introduced in June 2022 (ahead of adoption of the LPDMP), and as a result a minor modification to the policy is proposed so that the policy refers to Building Regulations standards, rather than carbon reductions against a baseline of 2013 Building Regulations standards, as these now achieve the same standard.

The standard for new dwellings proposed in the comment (a 31% carbon emissions reduction against 2013 standards achieved wholly through fabric) has not been tested. The LPSS includes policy that requires development to follow the energy hierarchy and this is reinforced by policy D12 which

		explicitly requires developments to follow the 'fabric first' approach. While these policies do not set a minimum carbon reduction through fabric measures alone, the Council will continue to scrutinise proposals to ensure these policies have been followed.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	Compton PC would prefer to see an interim climate-change mitigation policy introduced, which could be updated in the light of possible amendment to the Planning and Energy Act 2008. To introduce a more stringent carbon-reduction standard that is subject to "viability testing" would give developers the "wriggle room" to simply say that meeting the new standard is not viable.	This comment relates to the Issues and Options: Preferred Option (which was to wait for the outcome of the Future Homes consultation). Policy D14 was intended to form a stepping stone between the present time and the introduction of the national "Future Homes" standard in 2025. However, a minor modification has been proposed to amend the policy to refer to building regulations standards rather than carbon reductions against the 2013 standards. This is proposed because the government confirmed in February 2022 that the standards set out in policy would become the new national standards in June 2022.

### Other respondents

Paragraph	Main Issue Summary	GBC Response
Policy para 4	<p>Policy D14: Carbon Emissions from Buildings could provide more detail in: 5) Development proposals are strongly encouraged to improve upon the standards in paragraph 4.</p> <p>Paragraph 4) could add: "This is required to be achieved through improvements to the energy performance of the building 'including carbon sequestration from natural</p>	<p>The carbon reduction policy uses the national SAP/SBEM methodology which only takes account of regulated emissions (the emissions covered by Building Regulations) from building services. It does not take account of emissions from other sources, such as unregulated emissions (e.g. from appliances), embodied carbon and carbon sequestration. The language included in paragraph 4 reflected the language in the Planning</p>

	<p>building materials' and the appropriate renewable and low carbon energy technologies on site and/or in the locality of the development, or words to that effect.</p> <p>Given that carbon sequestration from construction materials is a key aspect in the reduction of carbon emissions an inclusion would be appropriate.</p>	<p>and Energy Act 2008 as this is the legislation that allows the Council to set carbon standards. However, a minor modification has been proposed to amend the policy to refer to building regulations standards rather than carbon reductions. This was made following the government's confirmation in February 2022 that the standards set out in policy would become the new national standards in June 2022.</p> <p>If the carbon reduction target is allowed to take account of unregulated emissions, the effect would be that standards would fall as schemes would likely provide easy and non-permanent measures, such as low energy appliances, or take into account sequestration from all the timber in the building, instead of long term measures like improving energy efficiency or providing low carbon energy. This would not be a desirable outcome.</p> <p>Policy D12 addresses embodied carbon emissions and LPSS Policy D2 addressed unregulated operational emissions already.</p>
Policy para 4	The 31% and 27% standards should be set higher.	<p>The Council considered whether to implement carbon emissions standards that were more demanding than the government's proposed uplift (now confirmed for June 2022) which are the same as the standards proposed in the Regulation 19 version of the policy. The Council has tested the increase on build costs that would result from improving emissions rates by 25%, 30% and 35% over 2013 Building Regulations standards (the extant standards) for a range of building types. The data shows that the costs increase significantly when improvements increase from 30% to 35%, and the viability testing shows that this uplift on build costs, along with the wide range and significant impact of other development and policy costs, may jeopardise the viability of some schemes. As a result, the viability study recommends not</p>

		<p>requiring carbon emission standards higher than the June 2022 national standards at this point. As well as improving the maximum carbon emission standards, the changes in June 2022 mean that new buildings will be designed to accommodate low carbon heating systems, and gas fired heating is proposed to end through the introduction of the 'Future Homes' and 'Future Buildings' standards from 2025. In February 2022 (after the Regulation 19 consultation had begun) the government confirmed that the new carbon emission standards would be introduced in June 2022 (ahead of adoption of the LPDMP), and as a result a minor modification to the policy is proposed so that the policy refers to Building Regulations standards, rather than carbon reductions against a baseline of 2013 Building Regulations standards, as these now achieve the same standard.</p>
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## Policy D15: Renewable and Low Carbon Energy Generation and Storage

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Ministry of Defence</b>	Left blank
Left blank	<p>In the event that proposals are received for wind turbines greater than domestic scale, the Council will consult with Gatwick Airport and NATS (the national air traffic system provider). In order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones, it is requested that the diction of Policy D15 Section 2.61 is supplemented with provision for the MOD to be consulted in line with current Planning Practice Guidance published on the Gov.uk website that acknowledges the potential effect of wind turbine generators and directs developers and Local Planning Authorities to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.</p> <p>The MOD request to be consulted on any development within the Aerodrome Height safeguarding zone that surrounds RAF Odiham, which consists of structures or buildings exceeding statutory safeguarding criteria.</p>	<p>This relates to the planning application process rather than the policy. The Ministry of Defence will be consulted on any proposals for wind turbines greater than domestic scale through the planning applications process. In line with current Planning Practice Guidance (Paragraph: 016 Reference ID: 5-016-20140306), it is proposed this information will be added to the supporting text of the policy through a minor modification.</p>

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	This policy requires future proofing to keep up with technology.	The policy is considered sufficiently broad with the term “renewable and low carbon energy generation and energy storage” covering current and future technology. Local Plans are reviewed every five years, if there is any significant change in technology this review would allow the policy to be updated to incorporate such technology.
Left blank	<b>Guildford Residents’ Association</b>	Left blank
Policy para 3	Suggested change: “Proposals are required to demonstrate that the design of the scheme, <u>including positioning, access and any lighting or fencing</u> , has sought to minimise visual impacts and that the management of the site will maximise opportunities for biodiversity while avoiding practices that are harmful to biodiversity.”	The design of a scheme would include consideration of positioning, access, lighting and fencing alongside other matters. The additional text is not considered necessary.
Left blank	A paragraph is needed in the policy on the special considerations that apply in the AONB and stressing the importance of not harming the natural beauty of the landscape. Prominent wind turbines would be particularly relevant in this respect.	The Local Plan (incorporating the LPSS and LPDMP, once adopted) will be read as a whole and includes adequate protections for landscape character/natural beauty and designations such as AONB and AGLV.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	Incorporate within the policy a stipulation that no land selected for large-scale renewable and low-carbon energy	The proposed policy does not allocate land for renewable energy development but sets the conditions for new

	<p>will impact the AONB or its setting, AGLV or the openness of the green belt.</p> <p>Place a greater emphasis on energy efficiency in terms of design.</p>	<p>renewable developments. The Local Plan (incorporating the LPSS and LPDMP, once adopted) will be read as a whole and with the NPPF includes appropriate protections for the landscape, AONB, AGLV and Green Belt. Developments that would result in adverse impacts would only be acceptable where the adverse impacts were outweighed by the benefits.</p> <p>It is beyond the scope of the policy to stipulate the energy efficiency of individual proposals. Energy efficiency in new development is covered by Policy D2 of the LPSS and by policy D13 of the LPDMP</p>
Left blank	<b>Campaign to Protect Rural England</b>	Left blank
Left blank	<p>Policy D15 (2) states that special circumstances may be considered where proposals for renewable and low carbon energy generation (such as wind turbines) are proposed in the Green Belt. This should be altered to state explicitly that proposals will not be considered for Green Belt land that lies within the Surrey Hills AONB.</p>	<p>It is not lawful to refuse to consider proposals.</p> <p>The Local Plan (incorporating the LPSS and LPDMP, once adopted) will be read as a whole and includes appropriate protections for the AONB, AGLV and Green Belt.</p> <p>The NPPF at para. 151 makes it clear that not all elements of renewable energy projects will constitute inappropriate development in the Green Belt, and that where they do permission may be granted if the project can demonstrate 'very special circumstances' which may include the wider environmental benefits. As a result, it is not possible for local plan policy to prohibit renewable energy developments on Green Belt land.</p>

**Other respondents**

Paragraph	Main Issue Summary	GBC Response
Left blank	<p>Although allocated land within the Green Belt is deemed 'harmful' unless the land meets the 'very special circumstances' test, it would be wise to continue to have open discussions as the methodology for renewable energy sites will continue to develop. In addition Surrey is known to be an area with great potential for solar energy.</p> <p>A consideration might be, that proposals associated with developers allocated sites that introduce an area within the site dedicated to renewable and low carbon energy generation and storage, that also become areas of high biodiversity net gain, could be strongly supported and encouraged.</p> <p>The Building Research Establishment (BRE) examples of recent renewable energy developments have seen net biodiversity gains as high as 178%. This might also address the issue of higher densities in GBC village environments.</p>	<p>The Local Plan (incorporating the LPSS and LPDMP, once adopted) will be read as a whole and contains policies that protect and enhance biodiversity. Policy D15 includes paragraph 3 which seeks to maximise the benefits to biodiversity on renewable schemes.</p> <p>D15(1) already provides support for proposals for renewable and low carbon energy generation and energy storage development, which would include on sites allocated for other forms of development. Policy P6/P7 introduces a requirement for new developments to achieve a net gain in biodiversity and the option remains for developers to consider providing biodiversity gains on land set aside for renewable energy generation and storage. Under policy D2 of the LPSS, the majority of developments already provide some low carbon energy on their development sites (mainly building based) and the improved standards proposed on Policy D13 are likely to see this increase.</p>
Para 5.246	<p>Whilst the National Grid will not be fully decarbonised by 2030 it will be very low in carbon intensity and will be fully decarbonised in the early lifetime of any solar development. Para 5.246 is therefore misleading and should be removed.</p>	<p>This point is acknowledged, but the text is correct where it states "The Council's ambition is for the borough to become zero carbon by 2030. This will require a significant or total reduction in the use of fossil fuels and a switch to low carbon energy. The national grid will not be fully decarbonised at that point so the amount of renewable and low carbon energy produced within the borough must also increase."</p> <p>The UK has committed to decarbonise the electricity system by 2035 (with recent announcements indicating this may be brought forward) and new low carbon energy schemes are required to achieve this aim. The government wants Local Plans to play a role in this; the NPPF (paragraph 155) requires plans to increase the use and supply of renewable</p>



		<p>and low carbon energy and heat. The Policy is in accordance with Surrey's Climate Change Strategy which aims to "support the national decarbonisation ambition by leading renewable energy generation expansion" with "15% of energy from solar PV by 2032".</p>
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## Policy D16: Designated Heritage Assets

### Prescribed bodies

None

### Other organisations

Paragraph Para/ policy para	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Barton Willmore LLP on behalf of Martin Grant Homes</b>	Left blank
Left blank	We note that the introduction to Historic Environment section of the consultation document is very much focused on designated heritage assets. The NPPF is clear that all heritage assets are important and should be conserved in a manner appropriate to their significance. This should be made clear within the Development Management Policies document.	Paragraph 5.264 sets out clearly that draft policy D16 relates to 'Designated Heritage Assets' and that 'Non-designated Heritage Assets' are covered by draft policy D20.
Left blank	As a general point, we propose that Policies D17, D18, D19 and D19a 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 draft policies D17, D18, D19 & D19a 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.

Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	We are broadly supportive of the policy. However, we think reference should be made Neighbourhood Plans and local amateur and professional historians as reference sources for specific sites and as consultees on planning applications.	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.
Policy para 3)	Section 3 implies harm to heritage assets is acceptable. "considered" needs to replace with "assessed".	There's nothing stated in the policy which implies that harm is acceptable. D16(3) simply sets out that in cases where harm is identified this harm will be considered in line with the requirements set out in the NPPF or national policy and guidance that may supersede it. It is considered that the suggestion of replacing the term 'considered' with 'assessed' will not add anything additional to the policy.
RJ para 5.277	Desk top Heritage assessments are not acceptable as part of planning applications. Applications must be supported by a full assessment including a site visit by a historian.	Desk based assessments are a widely used and recognised method of study, particularly when it comes to archaeology. Regarding archaeological assessments, there is a requirement that they comply with the <i>Code of Conduct</i> and other regulations of ClfA.  They also tend to be used as part of a suite of tools and processes that contribute towards an understanding of the heritage asset as set out in paragraph 5.274.

Left blank	<b>Guildford Residents Association</b>	Left blank
Policy para 1)	<p>In para 1) insert:</p> <p>All development proposals affecting designated heritage assets, including curtilage buildings and structures and their setting <u>and appreciation in views</u>, are required to be supported by an evidence-based Heritage Statement.</p>	<p>This request oversteps the NPPF and is deemed excessive. Appreciation in views is covered by the term setting, with the NPPF defining the setting of a heritage asset as the following.</p> <p><i>“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”</i></p> <p>And the historic environment PPG clarifying further that:</p> <p><i>“The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors...”</i></p>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Policy para 3)	<p>This section is weak and gives no clear planning objective to protect these assets, as the 2003 plan did. Item 3 of the policy should state that “Development proposals which result in harm to, or loss of, the significance of a designated heritage asset <u>will be refused</u> not that they will be “considered in line with national policy and guidance”.</p>	<p>The policy stipulates 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. Notwithstanding this, the addition of the suggested wording would result in the plan not being consistent with national policy, impacting on its soundness.</p>

<p>RJ para 5.281</p>	<p>Conservation Area Appraisals are not just a “useful tool” that can help with the assessment of significance – they are a “material consideration” in assessing planning applications; this is a potentially a serious side-lining of the appraisals. We ask that this section be rewritten.</p>	<p>In lieu of this comment the following minor mod to para 5.281 is suggested</p> <ul style="list-style-type: none"> <li>• “Supplementary planning documents such a Conservation Area Character Appraisals and the Guildford Town Centre Views SPD<sup>178</sup> <u>apart from being material considerations in determining relevant planning applications, are also useful tools that can</u> help with the assessment of significance.”</li> </ul>
<p>Left blank</p>	<p><b>Savills Planning on behalf of Bloor Homes</b></p>	<p>Left blank</p>
<p>Left blank</p>	<p>As has been mentioned in this representation, it is clear that local policies should avoid unnecessary duplication of policies and guidance. The NPPF, in Chapters 15 and 16, provides clear and legible guidance on how to approach Heritage matters, how to balance harm and how a decision maker should assess proposals that cause harm.</p> <p>Proposed policies D16, D17, D18 and D19 do not add anything over and above what is required for decision making in national guidance and relevant legislations concerning Conservations Areas and Listed Buildings. They appear to be unnecessary and repeat guidance and requirements already instilled in the planning system when dealing with heritage assets.</p>	<p>It is considered that this draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker. For example, this policy sets out the scope and content of heritage statements that will be required to accompany any application that involves a heritage asset. It also stresses the importance of providing these statements with adequate and accurate detailed information and sets out the LPA’s position for instances where this is not satisfied.</p>
<p>Para 5.262</p>	<p>If GBC wish that these policies remain in the plan, then Paragraph 5.262 of the LPDMP should be adjusted as it incorrectly implies that “setting” is a heritage asset, which is contradictory to the Historic England’s guidance.</p>	<p>In lieu of this comment, the following minor mod to para 5.262 (relating to draft policy D16) is suggested</p> <ul style="list-style-type: none"> <li>• “<u>Valued f</u>Features of <del>heritage significance the historic environment can</del> include, buildings, monuments, sites, <u>places, areas or</u> landscapes <del>and their setting</del>, and <u>those which are identified as having a degree of special interest</u></li> </ul>

		<u>or significance that merits consideration in planning decisions these</u> are referred to as heritage assets.”
Left blank	<b>Savills Planning on behalf of St Edward Homes Ltd</b>	Left blank
Left blank	<p>Proposed policies D16, D17, D18, D19, D19a and D20 do not add anything over and above what is required for decision making in national guidance and relevant legislation concerning Conservation Areas and Listed Buildings. They appear to be unnecessary and repeat guidance and requirements already instilled in the planning system when dealing with heritage assets.</p> <p>St Edward suggests that an effective measure would be to simply consider a single additional heritage policy, only where this would add anything locally distinctive or necessary to the LPSS, PPG and NPPF.</p>	<p>It is considered that this draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker. For example, this policy sets out the scope and content of heritage statements that will be required to accompany any application that involves a heritage asset. It also stresses the importance of providing these statements with adequate and accurate detailed information and sets out the LPA's position for instances where this is not satisfied.</p> <p>Whilst such a suggestion of consolidating this policy into a single policy with the proposed policies D16, D17, D18 &amp; 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.</p>
Para 5.262	If GBC wish that these policies remain in the plan, then Paragraph 5.262 of the LPDMP should be adjusted as it incorrectly implies that “setting” is a heritage asset, which is contradictory to the Historic England's guidance.	<p>In lieu of this comment, the following minor mod to para 5.262 (relating to draft policy D16) is suggested</p> <ul style="list-style-type: none"> <li>• <u>“Valued fFeatures of heritage-significance the historic environment can include, buildings, monuments, sites, places, areas or landscapes and their setting, and those which are identified as having a degree of special interest</u></li> </ul>

		<p><u>or significance that merits consideration in planning decisions these</u> are referred to as heritage assets.”</p>
Left blank	<b>Savills on behalf of Taylor Wimpey</b>	Left blank
Para 5.262	<p>Paragraph 5.262 of the GBC DMP incorrectly implies that setting is a heritage asset, which is contradictory to the Historic England guidance. This should be deleted.</p>	<p>In lieu of this comment, the following minor mod to para 5.262 (relating to draft policy D16) is suggested</p> <ul style="list-style-type: none"> <li>• <u>“Valued fFeatures of <del>heritage significance</del> the historic environment can</u> include, buildings, monuments, sites, <u>places, areas or</u> landscapes <del>and their setting</del>, and <u>those which are identified as having a degree of special interest or significance that merits consideration in planning decisions</u> <del>these</del> are referred to as heritage assets.”</li> </ul>
Left blank	<p>Overall, TW are broadly supportive of the policy’s content, although it is largely repetitive of adopted National and Local policy and the wording could be shortened and simplified in order to make it easier to follow.</p> <p>In summary, TW feel amendments should be made to this policy, TW suggest that Policy D17, D18 and D19 are unnecessary seeks that policies D17 to D20 are incorporated within this policy concisely.</p>	<p>It is considered that this draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker. For example, this policy sets out the scope and content of heritage statements that will be required to accompany any application that involves a heritage asset. It also stresses the importance of providing these statements with adequate and accurate detailed information and sets out the LPA’s position for instances where this is not satisfied.</p> <p>Whilst such a suggestion of consolidating this policy into a single policy with the proposed policies D16, D17, D18 &amp; D19 is</p>

		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.
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## Policy D18: Conservation Areas

### Prescribed bodies

None

### Other organisations

Paragraph Para/ policy para	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Quod on behalf of Portland Capital</b>	Left blank
Left blank	<p>Policy D18 needs to be closer aligned with NPPF wording (specifically paragraphs 199 – 208). The key policy test with regards to heritage is identified in paragraph 200 which states any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification.</p> <p>Emerging policy should give greater recognition to paragraphs 201 and 202 of the NPPF which relate to the balancing provisions with regards to heritage assets in cases of either substantial harm or less than substantial harm.</p>	<p>Draft policy D18 is to be read in conjunction with draft policy D16 which is an overarching policy for all designated heritage assets which include Conservation Areas, as reflected in para 5.268. It is considered, when taking in to account draft policy D16(3) as referenced in the Reasoned Justification at para 5.347, the policy does align with the NPPF.</p> <p>It is considered that this draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker. For example, this policy identifies certain key principles of development (policy para D18(3)) such as, the need for development to have regard to size and scale, but also sustainable and sympathetic building materials and detailing.</p>

	<p>Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.</p> <p>It is possible for development to come forward in sensitive locations that promotes a scale and density which is greater than the surrounding context while also responding to heritage assets and delivering significant public benefits. At present the policy appears overly restrictive with no recognition of the balancing provisions set out in the NPPF</p>	<p>There is also strong reference made within the policy to the retention of buildings and features of significance (policy para D18(2)), with clarity on what types of features are likely to be considered as having significance.</p>
Left blank	<p><b>Savills Planning on behalf of Bloor Homes</b></p>	Left blank
Left blank	<p>Proposed policies D16, D17, D18 and D19 do not add anything over and above what is required for decision making in national guidance and relevant legislations concerning Conservations Areas and Listed Buildings. They appear to be unnecessary and repeat guidance and requirements already instilled in the planning system when dealing with heritage assets.</p>	<p>It is considered that this draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context and clear guidance for the decision maker. For example, this policy identifies certain key principles of development (policy para D18(3)) such as, the need for development to have regard to size and scale, but also sustainable and sympathetic building materials and detailing. There is also strong reference made within the policy to the retention of buildings and features of significance (policy para D18(2)), with clarity on what types of features are likely to be considered as having significance.</p>

<p>RJ para 5.262</p>	<p>If GBC wish that these policies remain in the plan, then Paragraph 5.262 of the LPDMP should be adjusted as it incorrectly implies that “setting” is a heritage asset, which is contradictory to the Historic England’s guidance.</p>	<p>In lieu of this comment, the following minor mod to para 5.262 (relating to draft policy D16) is suggested</p> <ul style="list-style-type: none"> <li>• <u>“Valued Features of heritage significance the historic environment can include, buildings, monuments, sites, places, areas or landscapes and their setting, and those which are identified as having a degree of special interest or significance that merits consideration in planning decisions these are referred to as heritage assets.”</u></li> </ul>
<p>Left blank</p>	<p><b>Savills on behalf of Taylor Wimpey</b></p>	<p>Left blank</p>
<p>Left blank</p>	<p>The policy is unjustified and inconsistent with national policy as it is repetitive.</p> <p>Given the content of Policy D16 this policy does not seem necessary. Reference to Conservation Areas could be added to Policy D16 so that this policy can be removed. The reference in Policy D16 could include:</p> <p><u>“New development within or which would affect the setting of a Conservation Area is required to preserve and enhance the character and local distinctiveness of the area. It must pay due regard to the Council’s Conservation Area Appraisal for the relevant area”.</u></p> <p>Overall, TW feel it is appropriate to rely upon National guidance in tandem with Policy D3 Historic Environment of the LPSS. This policy therefore conflicts with the</p>	<p>It is considered that this draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker. For example, this policy identifies certain key principles of development (policy para D18(3)) such as, the need for development to have regard to size and scale, but also sustainable and sympathetic building materials and detailing. There is also strong reference made within the policy to the retention of buildings and features of significance (policy para D18(2)), with clarity on what types of features are likely to be considered as having significance.</p> <p>Whilst the suggestion of consolidating this policy into policy D16 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.</p>

	requirements of paragraph 16e) of the NPPF. Key points can be incorporated into Policy D16. Alternatively, GBC could add TW's suggested wording to Policy D16.	
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
RJ para 5.336	A clear statement is still needed that a CA Appraisal is a material consideration in application determinations, and that any approval will include a statement that the scheme is consistent with the appraisal.	<p>In lieu of this comment, the following minor mod to para 5.336 is suggested</p> <ul style="list-style-type: none"> <li>“These appraisal documents, <u>which are a material planning consideration</u>, undertake analysis that helps with justifying the reasons for designating the area. <u>These documents can be used as a material planning consideration in determining planning applications within these areas.</u>”</li> </ul>
Left blank	Article 4 restrictions must be mentioned. It is wrong that these require planning applications only for changes to residential frontages, and do not apply also to commercial units, particularly shops; it is vital that it is also applied to these, particularly those in the historic town centre where modification to the frontages of non-listed buildings must be controlled to maintain the character of the Conservation Area. We ask that all properties are included within the Article 4 requirement.	<p>Article 4 Directions are discussed in RJ paragraph 5.337.</p> <p>The application of Article 4 Directions are outside the scope of policy</p>
Left blank	A clearer policy is required for retention of traditional, and original materials for buildings in Conservation Areas and stating that plastic windows and doors are not allowed if fronting the road.	<p>This is not accepted as the building stock of Conservation Areas is so variable in terms of age and palette. The wording of Section 3b) allows for the use of original materials, but also provides some allowances for those circumstances where either:</p> <ul style="list-style-type: none"> <li>original materials cannot be sourced (due to extraction or manufacturing issues);</li> </ul>

		<ul style="list-style-type: none"> <li>• there is a technical reason (structural, theft prevention etc...) for an alternative material to be used in the interest of safeguarding the character; or</li> <li>• there is flexibility to introduce an alternative material without causing harm to the character of the area.</li> </ul> <p>Providing support to all of this is paragraph 5.353 which provides more clarity on this matter as well as providing examples of certain material types which will not be supported due to their detractive qualities. One of the materials stated clearly in all of this is uPVC (plastic).</p>
Left blank	<b>Ripley Parish Council</b>	Left blank
Left blank	<p>Ripley is widely regarded as one of the jewels in the crown of Surrey and although the centre of the village has been afforded some protection owing to its conservation status, this does not appear to have been sufficient as we have several buildings constructed over the past 40 years with little or no architectural merit. Whilst we welcome new technologies used in construction that offer advances in thermal gain, for example, it is important to recognise the rich historical tapestry that hundreds of years of building has created in Ripley. It is essential to consider the design aesthetically in order that it does not jar with its surroundings, and this should be more carefully considered and evaluated in all planning decisions. Let us build beautiful buildings as the Victorians did so successfully and leave a legacy of which we can all be proud.</p> <p>RPC feels very strongly that there is potential in this policy to further protect and enhance our village as a cultural asset and would welcome further discussion on this point.</p>	<p>Policy D4(3) addresses high quality design and representing local distinctiveness including a requirement that development proposals respond positively to aspects such as the history of a place, surrounding context and prevailing character.</p>

## Policy D19: Scheduled Monuments

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Union4 Planning</b>	Left blank
Left blank	The policy is supported, but it should be recognised that a number of ongoing operations are active within the vicinity of such heritage assets and it should be ensured that any adopted policy is not to the detriment of the efficient running of existing sites.	The policy has been designed in way which ensures that there is a balance between the protection and preservation of the scheduled monument without significantly prejudicing the use/operation of the site. However, it must be recognised that these are nationally important assets which are protected by law.
Left blank	<b>Barton Willmore LLP on behalf of Martin Grant Homes</b>	Left blank
Left blank	However, as discussed above, we propose that Policies D17, D18, D19 and D1Pa 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 and D19a 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.

	*D1Pa assumed to be D19a	It is considered that the emerging draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker. In this instance the policy provides additional detail and clarity regarding the requirement for preliminary archaeological desk-based assessments, setting out what is expected to be covered by such an assessment. It also goes on to set out the parameters when LPA are likely to be taking things further and requesting archaeological field examinations.
Left blank	<b>Savills Planning on behalf of Bloor Homes</b>	Left blank
Left blank	Proposed policies D16, D17, D18 and D19 do not add anything over and above what is required for decision making in national guidance and relevant legislations concerning Conservations Areas and Listed Buildings. They appear to be unnecessary and repeat guidance and requirements already instilled in the planning system when dealing with heritage assets.	It is considered that this draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker. In this instance the policy provides additional detail and clarity regarding the requirement for preliminary archaeological desk-based assessments, setting out what is expected to be covered by such an assessment. It also goes on to set out the parameters when LPA are likely to be taking things further and requesting archaeological field examinations.
Left blank	If GBC wish that these policies remain in the plan, then Paragraph 5.262 of the LPDMP should be adjusted as it incorrectly implies that “setting” is a heritage asset, which is contradictory to the Historic England’s guidance.	In lieu of this comment, the following minor mod to para 5.262 (relating to draft policy D16) is suggested <ul style="list-style-type: none"> <li>• <u>“Valued fFeatures of heritage significance the historic environment can include, buildings, monuments, sites, places, areas or landscapes and their setting, and those which are identified as having a degree of special interest or significance that merits consideration in</u></li> </ul>

		<p><u>planning decisions</u> these are referred to as heritage assets.”</p>
Left blank	<p><b>Savills on behalf of Taylor Wimpey</b></p>	Left blank
Left blank	<p>The policy is unjustified and inconsistent with national policy as it is repetitive.</p> <p>On this basis, reference could be added to Scheduled Monuments within Policy D16. This could be:</p> <p><u>“Proposals materially affecting a Scheduled Monument 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”.</u></p> <p>TW believe it is not necessary to have a specific policy on this and it should be deleted, as this can be covered in Policy D16. There is nothing locally distinctive in the policy that is not already covered in national guidance and other legislation.</p>	<p>It is considered that the emerging draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker.</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>



## Policy D19a: Registered Parks and Gardens

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>National Trust</b>	Left blank
Left blank	<p>Supportive of the additions to Policy D19a that aim to protect key views in relation to Registered Parks and Gardens, including preventing unsympathetic sub-division of the landscape.</p> <p>Notes that the requirement in the policy for development proposals to be accompanied by comprehensive information on the implications for the fabric or setting of a Registered Park and Garden has been removed in this version and requests that further explanation should be given in the Reasoned Justification as to what alternative measures or tests are in place to ensure that such analysis has been undertaken when development proposals come forward.</p>	<p>Whilst removed from this particular policy, it has not been removed from the LPDMP altogether, instead it has been relocated into draft policy D16(1) &amp; D16(2), as this policy section overarches all designated heritage assets. This is clarified in paragraph 5.380. There is also comprehensive guidance provided in Reasoned Justification for policy D16, specifically, paragraphs 5.272 – 5.285.</p>

<p>Policy Para 1a</p>	<p>The wording of 1a should be revised by replacing '<del>cause no unacceptable harm to the asset's significance</del>' with '<u>not cause substantial harm to the asset's significance</u>'. This change of wording would align Policy D19a with the wording in the guidance given in the National Planning Policy Framework paragraph 200 which uses the term 'substantial harm'.</p>	<p>Draft policy D19a(2) states that “<i>where harm to/loss of significance is identified this will be considered against policy D16(3) Designated Heritage Assets</i>” meaning that there is alignment with the NPPF. It is considered that the suggested wording would in fact not align with the NPPF, but instead go beyond it, when considering the wording and objectives of NPPF paragraphs 200, 201 and 202.</p> <p>With regards to policy D19a(1a) the intention of this section of the policy is to provide some valuable local context and guidance by specifying particular elements (layout, design, character etc...) that can contribute, directly or indirectly, to an assets special interest to which the LPA would not wish to see unacceptable harm.</p>
<p>Left blank</p>	<p><b>Barton Willmore LLP on behalf of Martin Grant Homes</b></p>	<p>Left blank</p>
<p>Left blank</p>	<p>The policy wording should not be more prescriptive than the NPPF to ensure that it is consistent with national policy.</p>	<p>It is considered that the emerging draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker. For example, the policy identifies particular elements (layout, design, character etc...) that can contribute, directly or indirectly, to an assets special interest to which the LPA would not wish to see unacceptable harm (D19a(1a), there is also points made regarding the unsympathetic sub-division of the landscape (D19a (1c)) and ensuring that development does not prejudice any potential for future restoration (D19(1d)).</p>

Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	We ask that this includes a policy to register (nationally) more of these. We would like to see the Castle Gardens so registered; they are now of historic as well as horticultural importance (currently only locally registered). The Plan needs to state that the responsibility for doing this lies with the Council.	This is beyond the scope of the policy.
Left blank	<b>Savills on behalf of Taylor Wimpey</b>	Left blank
Left blank	<p>The policy is unjustified and inconsistent with national policy as it is repetitive.</p> <p>On this basis, reference could be added to Registered Parks and Gardens within Policy D16. This could include:</p> <p><u>“Proposals materially affecting 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”.</u></p> <p>TW believe it is not necessary to have a specific policy on this and it should be deleted, as this can be covered in Policy D16. There is nothing locally distinctive in the policy that is not already covered in national guidance and other legislation.</p>	<p>Whilst such a suggestion of consolidating this policy into a single policy with the proposed policies D16, D17, D18 &amp; 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.</p> <p>It is considered that the emerging draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker. For example, the policy identifies particular elements (layout, design, character etc...) that can contribute, directly or indirectly, to an assets special interest to which the LPA would not wish to see unacceptable harm (D19a(1a), there is also points made regarding the unsympathetic sub-division of the landscape (D19a (1c)) and ensuring that development does not prejudice any potential for future restoration (D19(1d)).</p>

## Policy D20: Non-designated Heritage Assets

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Policy Para 1)	We support the broad thrust of this policy but section 1, should include 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 is reference to NPs in the introduction and within individual policies where they are most relevant – e.g. design and parking.</p> <p>Notwithstanding the above RJ paragraphs 5.389 &amp; 5.397 provide clarity that assets identified in Neighbourhood Plans are to be considered as non-designated heritage assets and therefore can be considered under this policy.</p>

Left blank	<b>Barton Willmore LLP on behalf of Martin Grant Homes</b>	Left blank
Policy para 3)	<p>The policy should reflect the exact wording of the NPPF and not be overly prescriptive. Part 3) should therefore be amended to reflect paragraph 203 of the NPPF which emphasises that a balanced judgement, considering benefits of development and harm, should be made in determining applications. Paragraph 203 states:</p> <p>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</p>	<p>Draft policy D20(3) states clearly that development proposals will be considered in line with national policy i.e. the NPPF. This will specifically include NPPF paragraph 203. The policy does not mention the NPPF by name or specific paragraph number as a means of futureproofing the LPDMP.</p>
Left blank	<p>For ease of reference and to be clear what the policy relates to, we consider that it may be helpful to amend the policy title to also refer to archaeology.</p>	<p>The name of the policy has been specifically chosen to reflect the terminology used in national policy. Introductory paragraphs 5.286-5.397 clearly set out what types of assets this policy will cover, with para 5.397 specifically providing clarity on 'Non-designated Heritage Assets of Archaeological Interest'.</p>
Left blank	<b>Savills Planning on behalf of Bloor Homes</b>	Left blank
Left blank	<p>It is not necessary to have a specific policy on this and it should be deleted, as this can be covered in Policy D3 of the LPSS and NPPF. There is nothing unique in the policy that is not already covered in national guidance and other legislation.</p>	<p>It is considered that this draft policy provides additional guidance and detail to the strategic policies in the LPSS and national policy/guidance. It is consistent with national policies however provides valuable local context for the decision maker. For instance, policy paragraph D20(2) expands on the NPPF and Policy D3 by stating clearly stating some key principles of development proposals affecting non-designated</p>

		<p>heritage assets, such as the expectation for them to “respond to and respect the special architectural and historical interest of the heritage asset and its local importance” and also “are designed and sited in a manner which conserves the asset, any features of interest and its setting”. One other example where additional guidance and detail is being provided is in draft policy D20(5) which sets out clear parameters regarding when an archaeological desk-based assessment will be required for non—designated heritage assets of archaeological interest.</p>
Left blank	<p>It is suggested that non-designated heritage assets are defined as those which have been specially defined as such through an appropriate source, made accessible to the public by the plan-making body. This could be by way of a Local List, or clear criteria for identification over a period of time or through consultation. As written in the PPG, identification should be based on “sound evidence”. Thus, clear process of these assets would help developers understand if surrounding features can be considered as non-designated heritage assets.</p>	<p>It is considered that paragraphs 5.389 – 5.398 provide the reader with sufficient background and understanding of each of the types of non-designated heritage asset.</p>
Left blank	<p><b>Holy Trinity Amenity Group</b></p>	Left blank
Left blank	<p>Ask that:</p> <p>The previous policy to treat Locally listed buildings the same as those statutorily listed be retained, except where there is an appeal that will be decided according to national rules.</p>	<p>Paragraph 203 of the NPPF makes it clear, in relation to applications that affect non-designated heritage assets, that “<i>a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset</i>”. However, this is in contrast to those policies which relate to designated heritage assets paragraphs 201 &amp; 202, which requires that any resultant harm is weighed against the public benefits of the proposal. Therefore, the request to treat locally listed buildings (non-designated heritage assets) the</p>

		same as statutory listed would be in direct conflict with the NPPF.
Left blank	Planning Permission be required for demolition of any locally listed building.	This is beyond the scope of the LPDMP
Left blank	The status of buildings designated in Conservation Areas Appraisals as “buildings of local Character” or “buildings of townscape merit” be noted as having some protection.	Clarification of assets identified in Conservation Area Appraisals and Neighbourhood Plans is set out in paragraph 5.389.
Left blank	As buildings from the Victorian period become older and fewer the need to upgrade designation to statutory listing becomes more important. We ask that a requirement be included to consider upgrading local to national listing as buildings become older and there are fewer of their type.	This is beyond the scope of the LPDMP
Left blank	<b>Savills on behalf of Taylor Wimpey</b>	Left blank
Para 5.388	<p>Object to paragraph 5.388</p> <p>The Planning Policy Guidance (July 2019) adds further detail stating that ‘Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.’ It goes on to refer to local/neighbourhood plans, conservation area appraisals/reviews, and importantly, the local Historic Environment Record (HER) as examples of where these assets may be identified, but specifically notes that such identification should be made ‘based on sound evidence’, with this information ‘accessible</p>	<p>The deletion of the suggested sentence for the reason that it is inconsistent with National Policy and leaves the policy open to interpretation which could impact allocated sites is not agreed with. It’s felt that the sentence about heritage assets is accurate and reflective of the NPPF’s definition within Annex 2 (page 67).</p>

to the public to provide greater clarity and certainly for developers and decision makers'. Thus, non-designated heritage assets are defined as those which have been specially defined as such through an appropriate source made accessible to the public by the plan-making body.

On this basis the following sentence should be deleted.

~~*“The definition makes it clear that heritage assets include those parts of the historic environment that may not be subject to a statutory designation (such as listing or scheduling).”*~~

TW believe this policy supporting text should be altered on the basis it is inconsistent with National Policy and leaves the policy open to interpretation which could impact allocated sites.



## Policy D21: Enabling Development and Heritage Assets

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	This appears reasonable but needs to be applied only with special justification for an historic town like Guildford.	As clearly stated in the RJ under paragraph 5.426 enabling development, by definition is a tool of last resort, after all other reasonable efforts that would secure the asset's survival have been exhausted.
Left blank	<b>Guildford Residents Association</b>	Left blank
Policy para 1(a)	In para 1) insert: 1a) the enabling development would not materially harm the significance of the heritage asset or its setting <u>or appreciation by the public</u> , and is the minimum necessary required to address the 'conservation deficit';	This request oversteps the NPPF and is deemed excessive. Appreciation of an asset, irrespective of whether that appreciation is public or not, is covered by the term setting, with the NPPF defining the setting of a heritage asset as the following.  <i>"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an</i>

		<p>asset, may affect the ability to appreciate that significance or may be neutral.”</p> <p>And the historic environment PPG clarifying further that:</p> <p><i>“The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors...”</i></p>
Policy para 1(b)	<p>In para 1) insert:</p> <p>1b) the enabling development is necessary to solve the conservation needs of the asset or place and not the financial needs of the present owner, <u>including public bodies</u>, or to compensate the price paid for the asset or site;</p>	<p>This suggestion is not accepted as it is not deemed necessary. Highlighting public bodies in the policy is not considered to be necessary as it they are captured under the term ‘present owner’.</p>
Policy para 1)	<p>In para 1) insert the following as a new policy paragraph</p> <p><u>the enabling development, including vehicular access, parking and infrastructure provision, would not harm rural character or the purposes of the AONB</u></p>	<p>The whole point of the policy as a tool of last resort, is to allow some degree of conflict with other planning policies as a means of securing the future conservation of a heritage asset that is at risk. To state policies/areas/circumstances where this would not be applicable would be in direct conflict with the sole objective of enabling development, thus overstepping paragraph 208 of the NPPF. Rural character and the AONB are subject to protections already offered by local / national policy.</p>
Left blank	<p>In para 5.451 delete the final bullet point. Provision of employment opportunities is not an appropriate justification in this context.</p>	<p>The Historic Environment PPG clearly states that “Public benefits may follow from many developments and could be anything that delivers economic, social or environmental</p>

		objectives as described in the National Planning Policy Framework ( <u>paragraph 8</u> ).” <u>020 Reference ID: 18a-020-20190723</u>
Left blank	The accompanying text should refer to assets owned by a public body having been acquired for the benefit of the people of Guildford.	The draft policy is to be applied without bias in terms of ownership, with assests owned by public bodies being considered in the same way as those which are not owned by public bodies, therefore there is no need to differentiate between the two within the supporting text. Equally, it is also worth noting that the list of potential public benefits set out in para 5.451 does include new or improved access to heritage assets and/or its setting.
Left blank	It should also refer to avoiding urbanisation of the countryside which is distinct from avoiding material harm to the setting of a heritage asset and its setting, which is sufficient in the context of an urban heritage asset.	The whole point of the policy as a tool of last resort, is to allow some degree of conflict with other planning policies as a means of securing the future conservation of a heritage asset that is at risk. To state policies/areas/circumstances where this would not be applicable would be in direct conflict with the sole objective of enabling development, thus overstepping paragraph 208 of the NPPF. The countryside is subject to protections already offered by local / national policy including in relation to AONB, Green Belt and countryside.
Left blank	<b>Barton Wilmore LLP on behalf of Martin Grant Homes</b>	Left blank
Policy para 3)	Part 3) should reflect the exact wording of paragraph 208 of the NPPF which states:  Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which	The wording for policy D21(3) is considered to be consistent with NPPF

	would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.	
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## Policy ID5: Protecting Open Space

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Sport England</b>	Left blank
Policy paragraph 1 a)	Sport England notes that the intention of the policy is also to protect land used for sport; playing fields and sports facilities which is welcomed by Sport England. Sport England considers that the actual policy wording under 1a could benefit from additional wording which places emphasis on the use of a robust evidence base or assessment to support the position that the “land is no longer needed as open space”.	This is dealt with in Paragraph 6.6 of the policy’s supporting text, which states that the onus is on the applicant to provide evidence to support their argument that there is a surplus of existing open space in respect of paragraphs 1a) and b) of the policy which would make development acceptable in terms of policy paragraph 1. It is not considered necessary in our view to revise the wording of the policy itself to emphasise what paragraph 1a) means by “... <i>where analysis has shown that:</i> ”, as the supporting text already does this adequately.
Policy paragraph 1 a)	The policy seems to be based on the requirements for demonstrating a surplus of provision, such that a loss can be justified. However, it doesn’t refer to the other parts of para 99 of the NPPF which permit the loss of land used for sport in the following circumstances:	The purpose of point 1) of the policy is to indicate the evidence that would be required to demonstrate the situations where it would be considered that an open space is clearly surplus to requirements. It was not intended to include further criteria of where development may be considered acceptable in principle for other reasons. These are already mentioned in NPPF paragraph 99 c) as well as in LPSS Policy ID4, paragraph (8),

	<ul style="list-style-type: none"> <li>•b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</li> <li>•c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</li> </ul> <p>Sport England considers that these elements of NPPF para 99 should be addressed within the policy.</p>	<p>and to repeat that paragraph here would simply be reiterating national policy and an existing Local Plan policy, rather than providing a local policy which supplements and accords with the NPPF’s position on protection of open space.</p> <p>Paragraph 6.10 does however refer to NPPF Paragraph 99 c) as an example of redevelopment of open space being justified by the alternative use providing benefits that outweigh the loss.</p>
Left blank	<p>Sport England welcomes the acknowledgement that the Council lacks an up to date and robust assessment of its playing pitch needs in the form of a Playing Pitch Strategy (PPS). A PPS will help to demonstrate compliance with para 98 of the NPPF, which sets out:</p> <p>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.</p>	Points noted.
Paragraph 6.11	<p>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</p>	<p>The Open Space, Sport and Recreation Assessment 2017 (OSSRA) provides the evidence of need for the quantitative, qualitative and access standards for all types of open space. The OSSRA satisfies the requirement in NPPF paragraph 98 for an up-to-date needs assessment, although the Council intends to supplement it in future with a playing pitch strategy (PPS), which will establish the proportion of the</p>

	<p>provision is needed, which plans should then seek to accommodate.</p>	<p>quantitative standard for Parks and Recreation Grounds that should be used for playing pitches. This is explained further in Policy ID6, paragraph 6.43 and footnote 264.</p> <p>The PPS when adopted will form a material consideration to determining planning applications and ultimately be used to update the standard for pitches in Policy ID6 on review of that policy.</p>
Left blank	<p><b>Thakeham Homes</b></p>	Left blank
Left blank	<p>This Policy seeks to afford greater protection for Open Spaces and sets out that exceedance of the minimum standards within the Open Space Sports and Recreation Assessment (OSSRA) does result in a surplus, this seems somewhat contradictory given that the OSSRA was carried out to assess existing Open Space and future requirements.</p> <p>The Adopted Local Plan: Strategy and Sites designated Open Spaces based (in part) on the GBC Assessment of sites for Amenity Value 2017. Some of these Open Spaces were designated solely on their aesthetic value and it does not simply follow that they are then suitable to be repurposed to other open space typologies, as this could have other significant impacts. Instead, their suitability should be individually assessed.</p>	<p>There is no contradiction within the policy. The policy affords significant protection for existing open space. Point 1) of the policy states that exceedance of the minimum standards does <i>not</i> mean that open space is surplus to requirements. Point 1 a) also indicates that only land no longer needed as open space may be considered potentially suitable for redevelopment. This is further clarified in paragraph 6.5, which states: <i>“The OSSRA’s audit of open space provision indicates wards of the borough in which minimum quantitative standards of provision have been met, as well as those wards in which there is a highlighted local quantitative deficit; however, it does not establish whether any sites are surplus to requirements, as all such provision may be well used.”</i></p> <p>Open spaces may be formally designated for a multitude of reasons including their aesthetic value, and be privately as well as publicly owned, as in the case of some of the sites identified in the Assessment of Sites for Amenity Value; however, Policy ID5 is intended to apply only to land that fits within one or more of the typologies of open space referred to in the Open Space, Sport and Recreation Assessment</p>

		<p>(OSSRA), which were also included in Table ID6a of draft Policy ID6. All of these typologies are publicly accessible and, as mentioned in paragraph 6.9, should be protected for their recreational value, even if they provide additional aesthetic or other benefits. This is in line with both the definition for open space at paragraph 6.3 and with NPPF paragraph 99.</p> <p>It would not be possible to demonstrate a surplus of land that provides aesthetic or biodiversity public benefits but that is not publicly accessible and provides no sport or recreational benefit, as in that case it could not be shown to be surplus in terms of point 1) a) or b) of Policy ID5. It would not fit into an open space typology, and – as the respondent points out – could not be simply replicated elsewhere by replacing it in another location. Other Local Plan policies can be used to assess proposals for redevelopment of these spaces, including LPSS Policies ID4: Green and Blue Infrastructure, paragraph (8) (for those formally designated on the Policies Map), D1: Place Shaping, and LPDMP Policy P8/P9: Protecting Important Habitats and Species. Paragraph 99 c) of the NPPF may also be of relevance in a few cases.</p> <p>To reaffirm this point, it is proposed to insert a new footnote from policy ID5, paragraph 1), after “land designated as Open Space”, worded as follows:</p> <p>“In this context, open space refers to land that fits into one or more of the typologies of open space assessed in the Open Space, Sport and Recreational Assessment (2017) and referred to in Table 6 (page 35) of that document. These open spaces are protected for sport and/or recreational purposes, though they may also have public value for aesthetic, biodiversity or other reasons.”</p>
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Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	<p>We ask that this be expanded as follows “Increased protection will be sought by pursuing, where appropriate, expansion of the AONB, and designation of land as Local Green Space, Right to Roam area, and Village Green.</p> <p>Views to and from the AONB are to be protected.</p>	<p>None of these types of land (AONB, Local Green Space, Right to Roam area, Village Green) fall within the general definition of open space, and they are treated differently within the NPPF with the level of protection afforded to AONBs and Local Green Space being significantly greater than for other types of open space (see NPPF paragraph 103 in relation to Local Green Space and 176-177 in relation to AONBs). Village greens and common land are protected under legislation (the Commons Act 2006) against development that would damage the land or undermine its designated purpose without the Secretary of State’s consent (S38 of the Act).</p> <p>Policy P1 of the Local Plan: Strategy and Sites protects the scenic beauty and setting of the AONB in line with the NPPF. It would not be reasonable to protect open space from development beyond the protection conferred by the NPPF or national legislation, nor reasonable to expect developers to contribute towards its expansion.</p>
Left blank	<p>We ask that it is clarified that to come under the “open space” category land must be open to all members of the public, except for allotments that may need security protection.</p>	<p>Whilst most open space will be publicly accessible, it is not true that open space must be accessible to the public to fit under the open space definition for the purpose of the policy. The NPPF Annex 2: Glossary defines Open Space as “<i>all open spaces of public value which offer important opportunities for sport and recreation and can act as visual amenity</i>”. This can include land that is not publicly</p>

		accessible but has public visual amenity, as explained in the definition in the policy's supporting text at paragraph 6.3.
Left blank	<b>Burpham Neighbourhood Forum</b>	
Left blank	Designated Open Space should under ALL circumstances remain as Open space, simply because any increase in population density brought about by development, enabled by this Local Plan, by its very nature will remove non designated open space and require more designated open space to serve the new development residents.	<p>Protection of all open space would not be in accordance with the NPPF which lists certain situations where development on open space may be permissible.</p> <p>There may be instances where there is already sufficient open space in the local area to meet the needs of any proposed residential development as well as the need of the existing local population; in such cases if it is demonstrated that the site in question is no longer needed as open space then there may be no reasonable argument to prevent its loss.</p>

### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	<p>The words "Views to and from the AONB" should be added to protect such views.</p> <p>These words in the 2003 Local Plan were very helpful and much used.</p>	Policy P1 of the Local Plan: Strategy and Sites already protects the scenic beauty and setting of the AONB. It would not be reasonable to protect open space from development beyond the protection conferred by the NPPF.

## Policy ID6: Open Space in New Developments

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	<p>We have reviewed the Draft Guildford Borough Local Plan: Development Management Policies Proposed Submission Local Plan, January 2022 alongside the Guildford borough Local Plan: development management policies Issues, Options and Preferred Options - Consultation and Duty to Cooperate Statement, January 2022 and our advice on and suggestions to policies H5, H6, P6, P7, P8, P9, P10, P12, P13, D11, D12, D13, D14, ID6, ID7 and ID10 as in our letter of 20 July 2020 have been applied. We acknowledge and accept the justifications made where the changes we suggested could not be applied.</p> <p>In respect to issues within our remit we consider the Proposed Submission Local Plan: Development Management Policies (2022) to be sound.</p>	Comments noted.

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Sport England</b>	Left blank

Left blank	<p>Sport England cannot support the approach advanced within the policy which is based on providing recreation and park space (which includes playing pitches) based on a standard per head of population. This is contrary to Sport England's policy which advocates the use of a robust assessment of the area's quantitative and qualitative sports pitch needs in accordance with para 98 of the NPPF to determine the quantum of sports provision to meet the needs for sport arising from new development. Sport England has produced the Playing Pitch Calculator which when used in conjunction with the PPS, can help to predict the level and type of new pitch provision needed to meet future generations</p>	<p>The Open Space, Sport and Recreation Assessment 2017 (OSSRA) provides the evidence of need for the quantitative, qualitative and access standards for all types of open space. The OSSRA itself satisfies the requirement in NPPF paragraph 98 for an up-to-date needs assessment, although the Council intends to supplement it in future with a playing pitch strategy (PPS), which will establish the proportion of the quantitative standard for Parks and Recreation Grounds that should be used for pitches.</p> <p>In the meantime, the proportion will be determined on a site-by-site basis based on evidence provided by the applicant and consultation with the Council's Parks and Leisure team and bodies such as Sport England. The PPS will form a material consideration to determining planning applications and ultimately be used to update the standard for pitches in Policy ID6 on review of the policy.</p>
Left blank	<b>Thakeham Homes</b>	Left blank
Left blank	<p>It would be very useful if there was further clarification within this policy and supporting text and tables;</p> <ul style="list-style-type: none"> <li>•Table ID6a appears to suggest an overall total of 2.68 hectares of open space is to be provided per 1000 population, it would be useful if this total was clearly stated (as per Table 2 of the accompanying topic paper).</li> <li>•Table ID6a, the Access Standard for Natural Green Space references Natural England's ANGSt standard. It would be useful if this could be clarified particularly since Table 18 of GBC's OSSRA identifies that many parts of the Borough do not meet the ANGSt standard in respect higher tier (20ha, 100ha and 500ha) natural green space sites.</li> </ul>	<p>Whilst the purpose of including a total quantity standard figure in the Open Space topic paper was to illustrate a comparison with other local authorities' open space policies, it is agreed that it may also assist developers to calculate the approximate total land take for open space within their sites. In this respect a minor modification is proposed to include a figure for the total open space standard per 1,000 people at the bottom of Table ID6a..</p> <p>The ANGSt standard is set out in paragraph 7.3.2 of the OSSRA which is available on the Council's website and is referenced in footnote 252 of the LPDMP, however, it is not referred to from the policy box. To improve clarity, we</p>

		propose to add a footnote from Table ID6a cross-referencing footnote 252.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	<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>Schemes below the on-site threshold will be expected to make an open space contribution, but in the form of a financial contribution in lieu of on-site provision. Financial contributions will go towards off-site open space provision or improvement to existing open space, depending on what the Council determines is most needed locally. Paragraph 3) of the policy reaffirms this point.</p> <p>Policy D4 paragraph (9) explains that masterplans and design codes will be required for sites that are developed by more than one developer or in multiple phases. The intention of this is to prevent situations where land may be artificially subdivided and thereby avoid providing on-site infrastructure including open space. Instead, it will create opportunities for developers to collaborate to meet wider policy requirements for infrastructure provision beyond their own site.</p>
Left blank	<b>CBRE</b>	Left blank
Paragraphs 6.17, 6.30 and 6.36	<p>Draft Policy ID6 is unclear in respect of the relationship between allotments and community growing space. The definition for allotments in paragraph 6.17 does not delineate if the allotment standards are for multiple plots or individual plots. Notwithstanding this, the supporting text in paragraph 6.36 states that community growing space will not be considered as a substitute for the provision of allotments on strategic sites. This is considered to conflict with the flexibility point noted in paragraph 6.30 which refers draft Policy ID6</p>	<p>A minor modification is proposed to paragraphs 6.17 to reflect that the size of allotments referred to in statutory legislation is a maximum size, rather than a minimum.</p> <p>There is no conflict between paragraphs 6.30 and 6.36 as they are unrelated to each other. Paragraph 6.36 states that community growing space will not be considered a substitute for provision of allotments on strategic sites, or for financial contribution towards allotments on these sites, whilst paragraph 6.30 states that for proposals that fall below the</p>

	could result in a proliferation of spaces which are poorly located/designed and impractical to manage.	on-site threshold in Table ID6a, on site open space provision may be permissible provided the space meets the minimum standards for site size, design and quality referred in policy paragraph (9).
Left blank	<p>On strategic sites which may come forward in phases such as Wisley Airfield, it is considered that flexibility to the provision of allotments and/or community garden space should be included, recognising the 95% of household survey respondents to the Open Space, Sport and Recreation Assessment (2017) who said they never use allotments. Flexibility for strategic sites would ensure the masterplan and subsequent applications, deliver an appropriate range of open space typologies across larger sites which would not undermine the overall design and character of the area.</p>	<p>The need for allotments was assessed through household surveys undertaken for the OSSRA and considered in its recommended quantity and access standards for them. The OSSRA also indicates that lack of allotment plots had been highlighted by consultation with parish councils.</p> <p>Paragraph 6.36 explains that Section 6.2 of the OSSRA recommends quality criteria for allotments, as well as quantitative standards for them. The qualitative criteria include provision of onsite and nearby facilities and are to be considered as requirements for new allotments required to be provided onsite through Policy ID6, in accordance with point 9) of the policy.</p> <p>There are no qualitative requirements in the policy for community growing spaces; hence policy point 6) and paragraph 6.36 state that community growing space should be considered as an addition to allotments and other types of open space rather than as a substitute for it.</p> <p>Furthermore, the standard of 0.25ha/1,000 for allotments represents only a modest uplift from average existing provision of 0.23ha/1,000 across the borough – see Section 6.2 of the OSSRA.</p>
Left blank	<b>Taylor Wimpey</b>	Left blank

Left blank	Adequate weight should be given to relevant SPDs and Policy D1 in the Local Plan (2019) and request for further clarity to the policy.	The Council does not see any conflict between Policy ID6 and LPSS Policy D1 or any of the adopted SPDs. It is not considered necessary to cross refer to other policies and the plan should be read as whole.									
Left blank	<p>As per Paragraph 35 of the NPPF (2019), the DMP must be consistent with National Policy. Thus, as worded the policy is ineffective, unjustified and inconsistent with national policy.</p> <p>There is currently a discrepancy between the ID6 proposed standards and those used within Part 3 of the Strategic Development Framework (SDF) SPD. Part 1 outlines the following:</p> <p>1)</p> <table border="1" data-bbox="365 871 1193 1334"> <thead> <tr> <th data-bbox="365 871 640 1062">Typology</th> <th data-bbox="640 871 913 1062">Quantity Standards (ha/1000 people)</th> <th data-bbox="913 871 1193 1062">Access standard (maximum distance from the new homes)</th> </tr> </thead> <tbody> <tr> <td data-bbox="365 1062 640 1198">Allotments</td> <td data-bbox="640 1062 913 1198">0.25</td> <td data-bbox="913 1062 1193 1198">480 Metres or 10 minutes walk time</td> </tr> <tr> <td data-bbox="365 1198 640 1334">Amenity Green Space</td> <td data-bbox="640 1198 913 1334">1 (total)</td> <td data-bbox="913 1198 1193 1334">720 metres or 15 minutes walk time</td> </tr> </tbody> </table>	Typology	Quantity Standards (ha/1000 people)	Access standard (maximum distance from the new homes)	Allotments	0.25	480 Metres or 10 minutes walk time	Amenity Green Space	1 (total)	720 metres or 15 minutes walk time	<p>Policy ID6 is underpinned by recent evidence on need for open space (the OSSRA, which addresses the requirement in NPPF paragraph 98 for an up-to-date needs assessment to inform planning policies covering open space) and is intended to supersede the saved 2003 Local Plan Policy R2 on adoption of the LPDMP.</p> <p>The current open space standards referred to in the Planning Contributions SPD and the Strategic Development Framework SPD (which these documents reference as being based on the Local Plan 2003 standards) will inevitably become out of date on adoption of the LPDMP, until they are revised later.</p>
Typology	Quantity Standards (ha/1000 people)	Access standard (maximum distance from the new homes)									
Allotments	0.25	480 Metres or 10 minutes walk time									
Amenity Green Space	1 (total)	720 metres or 15 minutes walk time									

	<table border="1"> <tr> <td data-bbox="369 199 638 300">Natural Green Space</td> <td data-bbox="645 199 913 300">1 (total)</td> <td data-bbox="920 199 1187 300">ANGSt Standard</td> </tr> <tr> <td data-bbox="369 304 638 475">Parks &amp; Recreation Ground</td> <td data-bbox="645 304 913 475">1.35 public &amp; private of which is a minimum of 0.8 is public</td> <td data-bbox="920 304 1187 475">720 metres or 15 minutes walk time</td> </tr> <tr> <td data-bbox="369 480 638 580">Play Space (Children)</td> <td data-bbox="645 480 913 580">0.05</td> <td data-bbox="920 480 1187 580">480 metres or 10 minutes walk time</td> </tr> <tr> <td data-bbox="369 585 638 676">Play Space (Youth)</td> <td data-bbox="645 585 913 676">0.03</td> <td data-bbox="920 585 1187 676">720 metres or 15 minutes walk time</td> </tr> </table>	Natural Green Space	1 (total)	ANGSt Standard	Parks & Recreation Ground	1.35 public & private of which is a minimum of 0.8 is public	720 metres or 15 minutes walk time	Play Space (Children)	0.05	480 metres or 10 minutes walk time	Play Space (Youth)	0.03	720 metres or 15 minutes walk time	
Natural Green Space	1 (total)	ANGSt Standard												
Parks & Recreation Ground	1.35 public & private of which is a minimum of 0.8 is public	720 metres or 15 minutes walk time												
Play Space (Children)	0.05	480 metres or 10 minutes walk time												
Play Space (Youth)	0.03	720 metres or 15 minutes walk time												
Policy paragraph 3)	<p>Draft policy ID6 requires further clarification of the detail and catchment distances between the differing types of Children's Play (LAP, LEAP &amp; 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.</p> <p>On this basis, TW propose the following changes to part 3:</p>	<p>The OSSRA (p53) indicates that the FiT open space standards were seen as unrealistically high and undeliverable, as they would require provision significantly above current levels and would result in a proliferation of play areas that can be difficult to maintain. The OSSRA therefore recommended amending the adopted quantitative and access standard for play space – which are based on the old FiT recommended standards – to the new standards listed in Table ID6a which tie in with the identified local need.</p>												



3) Where new open space is provided, it should meet the following quantity and access standards:

Typology	Quantity Standards (ha/1,000 people)	Access Standard (expected maximum distance from new homes)
Allotments	0.25	720 metres or 15 minutes walk time
Amenity Green Space	1 (total)	720 metres or 15 minutes walk time
Natural Green Space	1.35 public & private of which maximum 0.8 is public	720 metres or 15 minutes walk time (except playing pitches)
Play Space (Children)	0.05	480 metres or 10 minutes walk time - <u>only applicable to LEAPS - need alternative provision for LAPS and NEAPS to align with FIT standards and GBC alternative walking times in particular for strategic sites</u>

LAPs and LEAPs both come under the category of children's play space, however based on findings of the household surveys undertaken for the OSSRA they have the same access standard (480m /20 minute walk time) as each other. There is therefore no need to subdivide children's and youth play space further for LAPS and LEAPS.

Paragraph 4.26 of the Open Space Topic Paper **[check correct para no. in final pdf version]** explains that NEAPs fit within the Youth Play Space category and that a 15-minute walk time was chosen for this category based on responses to the surveys undertaken – see also pages 53-54 of the OSSRA.

	Play Space (Youth)	0.03	720 metres or 15 minutes walk time	
<p>Paragraphs 6.36 – 6.38</p>	<p>Section 6 sets out the requirement for Community Growing Spaces – TW object to these spaces not being considered in combination with allotments. Community growing gardens provide a popular shared doorstep facility as opposed to expansive allotments space which can require travel and are high maintenance. On strategic sites, such as FWA, there will be a Community Trust to manage the community growing spaces, these would be preferable to many residents and it would also assist in ensuring that the areas do not run derelict. The community cohesion associated with community growing spaces is also something that should be encouraged by GBC. On this basis, TW proposed part 6 is reworded as follows:</p> <p>New residential development proposals are expected to consider provision of community growing space in addition tandem with allotment provision to other types of open space.”</p> <p>In addition to this, the supporting text should be updated (6.36-6.38). In particular TW request that the following change is made (new text and deleted text outlined):</p> <p>“6.36 New <u>statutory</u> allotments provided onsite to comply with the <u>quantity</u> standards in policy ID6 <del>will be required to be of at least the minimum size for a statutory allotment (see definitions),</del> unless there is <u>evidence that</u> adequate existing</p>			<p>Maintenance for open space required under the policy is ensured by paragraph 6.41, which states that the responsibility for maintenance lies initially with the developer and/or a management company appointed by them, although there may be opportunities for transfer of ownership of the space to the Council subject to a one-off payment to cover its medium-term upkeep. There are no similar provisions in place for maintenance of community growing space, nor qualitative standards for them, whereas point 9) of the policy requires these standards to be met for allotments and all other open space typologies listed in Tables ID6a and ID6b.</p> <p>The definition for allotments at paragraph 6.17 requires individual allotments to be greater than 20 poles (100.5 sqm). A minor modification has been proposed to this paragraph in line with the wording of the Allotments Act 1922 to require provision of individual allotments measuring no greater than this size. This will increase flexibility for developers regarding the size that may be provided, and we consider will also overcome any potential issue that may</p>

	<p>provision of allotments of this size <u>are available</u> in the local area to meet <u>some or all</u> of the demand arising from the proposal. Applicants should be aware that community growing space will not be considered as a substitute for provision of allotments on strategic sites or for financial contribution towards allotments on non-strategic sites. <u>On strategic sites, where evidence demonstrates there is not the need / limited demand for formal allotment space, a review can be undertaken for initial phases of development to assess demand, which can inform the provision proposed within future phases.</u> The OSSRA (Section 6.2) provides some general quality 201 recommendations for new allotments. <u>As Allotments are distributed within a 15 minute walk and to encourage modal shift, they should only require limited space to drop-off/pick-up heavier materials."</u></p>	<p>otherwise have arisen of allotments becoming derelict due to lack of use.</p> <p>The Council would wish in any case to ensure adequate provision of (and protection for) statutory allotments, regardless of any issues that might potentially arise with short-term take-up on strategic sites. The scale of on-site provision required under the policy's quantitative standard is in line with the level of demand identified by the OSSRA and is not considered to be unreasonable, particularly given the above-mentioned increased flexibility over the size requirement.</p>
<p>Policy point 4) and paras 6.43 – 6.46</p>	<p>Sections 4 and reasoned justification 6.43-6.46 outline opportunities for the provision of outdoor sports space. The playing pitch strategy is not yet published, therefore the evidence base for these sections of the policy is unknown and therefore cannot be interrogated at this stage. TW consider it inappropriate for draft policy to be included in regard to the strategy, therefore part 4) should be deleted and replaced (see below). The following should be deleted:</p> <p><del>"4) The standard for parks and recreation grounds in Table ID6a includes an allowance for playing pitches. Where artificial grass pitches (AGP) are proposed in place of natural grass pitches, this is required to be justified by evidence of local need for this type of pitch."</del></p>	<p>The OSSRA provides the evidence of need for the quantitative, qualitative and access standards for all types of open space, including playing pitches. The OSSRA satisfies the requirement in NPPF paragraph 98 for an up-to-date needs assessment to inform Policy ID6.</p> <p>The inclusion of a requirement for justification for artificial grass pitch (AGP) in place of natural grass pitches was made on the advice of Sport England following direct consultation with them. Whilst AGPs can support a high intensity of usage compared to grass pitches due to being usable in all-weather conditions they frequently incur higher costs to maintain, are less likely to deliver biodiversity gains and may not be suitable for all grass pitch sports. This point is explained in paragraphs 6.44 – 6.45.</p>

<p>Policy point 4) / Definitions</p>	<p>The OSSRA 5.1.3 refers to Parks and Recreation grounds, which now include publicly accessible outdoor sports space pitches (including rugby and football) and non-pitch sports (including tennis and bowls). There is no further definition or guidance on what constitutes a sport (whether pitch or non-pitch). The FIT guidance provides a similarly restricted list, citing the most well-known pitch and non-pitch sports, which collectively may lead to missed opportunities to include other growth sports. TW believe an overarching definition of what constitutes a sport would take away some of the ambiguity around this topic, which could also reference those sports recognised by Sport England and UKsport. TW supports the wording used by The Council of Europe charter on sport, which uses the following definition. This should replace part 4):</p> <p><u>"Sport means all forms of physical activity, which through casual or organised participation, aim at expressing or improving physical fitness and mental well-being, forming social relationships or obtaining results in competition at all levels".</u></p>	<p>Paragraph 6.15 defines the Parks and Recreation Grounds typology as formal parks, recreation grounds and outdoor sports space. To improve clarity and distinguish this open space typology better from amenity green space, a minor modification is proposed to insert a definition for Parks and Recreation Grounds, consistent with the definition in the OSSRA. The proposed wording for this is as follows:</p> <p><u>6.19A Parks and Recreation Grounds – These include formal parks, recreation grounds and outdoor sports space, for both pitch and non-pitch sports. They also include the general open space surrounding play areas, sports facilities etc. used for general recreation (but not informal recreation space in and around housing developments which is separately classified as amenity green space).</u></p> <p>It is not considered necessary or possible to provide an exhaustive list all activities that could be viewed as sports, bearing in mind the large number of sports currently in existence, and new sports that may emerge in future. The definition for Parks and Recreation Grounds will include a reference to the OSSRA, which lists examples for some of the functions, including sports, which this typology is intended to include.</p>
<p>Policy point 4) and Table ID6a</p>	<p>There is no quantum or percentage given to the level of playing pitches that can be considered within the Parks and Recreation typology. It is not clear if this will be in addition to any sports standards coming forward or in tandem. On strategic sites, this could have significant effects on land budget and place making.</p>	<p>Paragraph 6.43 explains that the case-by-case approach to determining the proportion of Parks and Recreation Grounds that is expected to be playing pitches will be established based on local need, and that this need will be assessed taking account of the evidence in the OSSRA, as well as advice from the Council's Parks team and other bodies such as Sport England. It is the Council's view that this approach</p>

	<p>Whilst TW agree with the consideration of artificial grass pitches (AGP's) and artificial turf pitches (ATP's) as a potential for discounting sports provision on a case by case basis, however the policy and justification does not set out the mechanisms or equations on which these decisions will be made.</p> <p>TW object to the lack of flexibility and quantification set out within section 4 and its justification. This wording is not supported by NPPF paragraph 35 (a) as it is not positively prepared.</p>	<p>satisfies the test in NPPF paragraph 35 for a positively prepared strategy.</p> <p>Footnote 264 explains that the Council intends to produce a playing pitch strategy (PPS) that will establish the proportion for sites in future. As this has not yet been produced, its content cannot be referred to. However, it is intended that the PPS would form a material consideration to determining planning applications; and would ultimately provide the standard for pitches in Policy ID6 on future review of the policy.</p>
Policy point 4) and Table ID6a	<p>AGP are very beneficial for a number of reasons but notably allowing all year round use and multiple pitch and non-pitch sports to take place in the same area. These are appropriate for large strategic sites, and this has been strongly supported by the case officer for FWA. This unnecessary justification posed by the policy will discourage developers including AGP, even though they have potential to be highly beneficial. TW want this to be removed from the policy so that the necessary justification for the masterplan can be included within the planning application in the usual way. On this basis, TW propose part 4 of this policy is deleted.</p>	<p>The inclusion of a requirement for justification for artificial grass pitch (AGP) in place of natural grass pitches was made on the advice of Sport England following direct consultation with them. Whilst AGPs can support a high intensity of usage compared to grass pitches due to being usable in all-weather conditions, they frequently incur higher costs to maintain, are less likely to deliver biodiversity gains and may not be suitable for all grass pitch sports. This point is explained in paragraphs 6.44 – 6.45.</p>
Left blank	<b>Martin Grant Homes</b>	Left blank
Policy, Table ID6a	<p>With regard to the accessibility standards for the open space typologies, we welcome the amendment to 'expected maximum' distances within Table ID6a rather than absolute maximums. Following ridged accessibility standards can compromise the layout and design of certain schemes and</p>	<p>This proposed change to the policy is not considered necessary, as paragraph 6.25 explains that this means that site-specific considerations will be borne in mind when considering whether the 'expected maximum distances' in Table ID6a should be precisely met, or if longer distances</p>

	<p>not always take into consideration the best areas within a site for certain typologies. In this context, we recommend the final sentence of Part 1) should state:</p> <p><b>New open space is expected to meet the access standards in Table ID6a <u>where possible and appropriate.</u></b></p>	<p>might be permissible to take account of a proposed scheme's design and layout.</p>
Policy, paragraph 3)	<p>Taking account of this, Part 3) relating to financial contributions should be applied flexibly to reflect where open spaces are provided albeit a slightly further distance from new homes.</p>	<p>Paragraph 3) of the policy states that financial contributions will be sought only in cases where the quantitative standard (in the second column of Table ID6a), rather than the access standard (in the third column), is not met. This situation may arise either if a proposal does not meet the on-site threshold in Table ID6b, or it meets the threshold but on-site provision is shown not to be feasible – see policy paragraph 2).</p>
Policy, point 5)	<p>In relation to Part 5), the principle of seeking community use of privately owned pitches is supported. However, in some cases, community use may not be appropriate, or may only be appropriate at limited times, for example if there are particular security arrangements in place to protect school students. As such, the requirement should be applied flexibly depending on individual circumstances.</p>	<p>Paragraphs 6.47 – 6.48 outline the principle of community use agreements for any privately owned pitches proposed; these will need to demonstrate that the pitches are <i>reasonably</i> available for public use – although there may be certain periods when the public is not permitted to access the facility, such as the respondent describes. Paragraph 6.48 indicates that the proposed hours of public access and any intended charges for use will need to be detailed to address this point.</p> <p>This approach is sufficiently flexible as it will ensure that land does not need to be publicly owned to be considered a playing pitch. The NPPF describes open space as important for the health and well-being of communities, and it should</p>

		be expected that a reasonable element of public access is necessary to achieve this aim.
Policy, point 10)	We 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.	As paragraph 10) states “a range of benefits <u>including...</u> ”, it should be interpreted from this that not all the benefits listed in this paragraph are required to be delivered on all sites. However, Policy P6/P7 requires that all development is expected to deliver a biodiversity net gain, except for development exempted from this requirement by national policy or legislation. This will therefore mean that open space will be expected to achieve at least two benefits, including its primary intended benefit, and therefore may be classed as multi-functional space.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	This policy should include and designate New Local Green Spaces as part of the development process. These should include animal corridors across the development.	Local Green Space falls outside of the general definition of open space and is treated differently within the NPPF regarding the level of protection afforded to it which is significantly greater than for other types of open space (see NPPF paragraph 103). It would not be reasonable for a policy on open space provision to require provision of land that falls outside of the open space definition, and that is unable to be redeveloped in future in accordance with the criteria for redevelopment of open space in NPPF paragraph 99.
Left blank	<b>Quod on behalf of Portland Capital</b>	Left blank
Left blank	Policy wording should be updated to allow additional flexibility relative to the requirement to provide open space	Point 2) of the policy already states that development proposals meeting the on-site threshold in Table ID6b are

	<p>on site and requirement for financial contributions where this may compromise wider residential delivery.</p> <p>Such a requirement should be reviewed on a site-by-site basis. This is reflective of the consideration of viability identified within the NPPF and identifying land for homes. At Paragraph 68 it states:</p> <p>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> (Quod Emphasis)</p>	<p>expected to provide on-site open space unless it can be clearly shown not to be feasible.</p> <p>There is also flexibility within the access standards for new on-site open space in Table ID6a, as these are expected maximum distances from new homes, rather than fixed distances. Paragraph 6.25 clarifies that these access standards will be considered in respect of site-specific considerations to ensure as far as possible that the proposed design and layout of any scheme is not compromised.</p> <p>Whilst paragraph 68 of the NPPF relates to the identification of sites as part of a strategic housing land assessment rather than decision making on planning applications, the cumulative impacts of the policies of the LPSS and LPDMP have all been subject to viability assessment.</p>
Left blank	<p>Policy 124 of the NPPF 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>Current policy wording is likely to result in a conflict between the NPPF which seeks to maximise residential density and the efficient use of land in sustainable locations, and the need to provide open space in line with the emerging policy standards.</p>	<p>It is not agreed that there is any conflict with the NPPF. Paragraph 124 of the NPPF does not state that residential densities should be maximised.</p> <p>Point 2) of the policy states that open space should be provided on-site for all schemes meeting the on-site thresholds in Table ID6b unless it can be shown not to be feasible. It is up to the applicant in these cases to demonstrate that this is not feasible and in such cases a financial contribution in lieu may be considered as an alternative. This is a flexible approach and the requirement</p>



		to meet the standards in the policy should not have any impact on scheme viability.
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## Policy ID8: Community Facilities

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Burpham neighbourhood forum</b>	Left blank
2a; 5	<p>Concern that the phrase “conveniently accessed” is not defined as a distance. This could result in large travelling distances and closure of the existing facilities to the detriment of existing communities.</p>	<p>There are a wide range of types of community facility, in many cases with differing catchment areas. It is not considered that defining a specific distance or distances in policy is justified. Further, the use of the term ‘convenient access’ allows for qualitative aspects to be considered (in addition to quantitative measures). Physical proximity to a facility does not always translate into it being conveniently accessible to intended users.</p> <p>This wider consideration is detailed further at paras 6.55 and 6.59, with the latter pointing to factors that may be considered in making a planning judgement regarding the comparative convenience of access of proposed alternate or replacement facilities.</p>

	<p>This should not be used as an excuse to not facilitate supply of such new or needed community facilities in the adjacent communities.</p>	<p>Policy 2a expects new facilities to be located and designed so that they can be conveniently accessed by their intended users. This should not detract from the supply of facilities where they are needed, but rather ensure that they are located and designed appropriately.</p>
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## Policy ID9: Retention of Public Houses

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Hants Borders Branch CAMRA</b>	Left blank
Left blank	<p>It would help if it was clear that this policy applies to both closed public houses as well as those that are currently trading. I would suggest it explicitly states that pubs that have been closed in the last 5-years are covered by this policy.</p>	<p>The loss or partial loss of a public house as the result of change of use or demolition, which is referred to in paragraph 6.72, covers vacant premises as well as those currently occupied and trading as it relates to loss of the building's existing permitted use. This is considered implicit in the existing draft policy wording. It will however be further clarified by the forthcoming Marketing SPD.</p> <p>There is also no reasonable justification in our view to define a maximum number of years in which a public house has been closed for the policy to apply; the tests of marketing and evaluation of potential trade can be used to ascertain long term viability, regardless of the length of any period of vacancy.</p>
Para 6.68	<p>With respect to viability it is suggested that wording is included in the justification to the effect that applicants be asked to provide evidence in the form of trading accounts for the last</p>	<p>Paragraph 2(a) of the policy requires, for public houses outside the town centre boundary, <i>"a comprehensive evaluation of the public house's continued viability, with detailed consideration of</i></p>

	<p>three years in which the business was operating as a full-time business. Furthermore, this should be a requirement for public houses both within the town centre and throughout the rest of the Borough.</p>	<p><i>its existing and potential trade</i>". The Marketing SPD will provide further guidance as to the types of evidence that would be required in order to demonstrate that such evaluation has taken place. This is referred to in paragraph 6.68 (the definition for 'evidence of continued viability') and may include a similar form of evidence to that proposed by the respondent, albeit potentially covering a shorter period in line with the policy's requirement for an 18-month continuous marketing period.</p> <p>Paragraph 6.68 and footnote 278 also refer to CAMRA's Public House Viability Test as an appropriate method of evaluation.</p>
<p>Paras 6.72 – 6.75</p>	<p>Furthermore with respect to all evidence submitted it is suggested that text is added to confirm that procedures to ensure that submitted evidence is properly scrutinised. If the Council does not have the resources to carry this out in house a requirement on the applicant to cover the costs of such scrutiny should be considered for inclusion.</p>	<p>This relates to more detailed implementation of the policy and thereby falls outside of the scope of the LPDMP; however, should a requirement arise for an external resource to assess a developer's submitted evaluation of continued viability for a public house, it is expected that the Council would itself cover the cost of this work.</p>
<p>Para 6.69</p>	<p>With respect to reasonable walking distance, it is suggested that the explanatory text clarifies that 800m should be the distance which a customer should be required to walk to an alternative facility, rather than an 800m radius. There are instances where a public house may be geographically close by, but roads or rivers act as barriers, make the distance needed to travel to reach it significantly longer.</p>	<p>The definition for 'reasonable walking distance' in paragraph 6.69 already includes two means of measurement. These are not considered to need further clarification as they are intended to be used as a general principle. if the boundary of a public house falls within an approximate 800m radial catchment of the majority of properties that it serves but physical geography or barriers would mean it would take considerably longer than 10 minutes to reach it on foot, then it may not be considered to fall within reasonable walking distance. This is a matter that will be considered on a site-by-site basis.</p>
<p>Left blank</p>	<p><b>Holy Trinity Amenity Group</b></p>	<p>Left blank</p>

Left blank	<p>This must be linked to a policy of not giving permission for a change of use to A4 (pub) for large premises, say more than 80sqm.</p> <p>Change of use was granted to one of a the large Tunsgate units, fortunately not so far implemented. If it had been many historic pubs in the area would have been forced out of business.</p>	<p>It would not be justified or in the interest of effective plan-making to set a maximum size limit for which permission may be granted for a change of use to a public house. Such planning applications should be dealt with on their own merits, taking account of relevant Local Plan policies.</p>
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	<p>Nighttime public transport across the borough would benefit businesses such as public houses</p>	<p>Comment noted; however public transport services fall beyond the scope of the Local Plan to influence.</p>

## Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>National Highways</b>	Left blank
Left blank	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 National Highways assets.	Noted.
Left blank	<b>Environment Agency</b>	Left blank
Left blank	Advice on and suggestions to policy ID10 has either been applied or we acknowledge and accept justifications made where changes suggested at the Regulation 18 stage could not be applied.	Noted

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>National Trust</b>	Left blank
Left blank	There is potential to extend the Sustainable Movement Corridor	The map shows the potential for a cycle connection along Epsom Road, which would pass near to Clandon Park. Figure 5 in the Strategic Development Framework SPD

	(SMC) south from Gosden Hill Farm to join Clandon Park up to Guildford town centre via sustainable means of transport.	(consulted upon Jan-Feb 2020, adopted July 2020) - which was also previously published in the GBC-LPSS-25a examination document - showed the illustrative route of the SMC, which includes a potential additional or alternative section which is routed via the Epsom Road. However, this potential SMC section has not been included on the Policies Map as it is indicative.
Left blank	The Trust suggests that text should be added to the Reasoned Justification to cover the need for appropriate impact assessment before potential cycle routes are promoted.	The majority of routes identified have only been established at a concept level and the identification of improvements will, in such cases, require feasibility and design stages to be undertaken. This will involve undertaking road safety auditing and impact assessments, as appropriate, taking into account any relevant statutory designations.
Left blank	<b>Ockham Parish Council</b>	Left blank
Appendix A	The routes identified are unrealistic on many country lanes, certain routes in the parish cannot be considered part of a 'network' as they are impassable, muddy tracks or on narrow 40mph country lanes.	The mapped network of routes and infrastructure is not intended to solely be made up of current routes and infrastructure, it is to highlight that a connection between certain points could be established or improved.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	We support this policy in principle, but studies show that the use of cycle lanes is very limited and removes valuable road space for other vehicles which is already limited within Guildford.	The local cycle network is incomplete at present with short sections of infrastructure in place, but which do not join up. The development of a comprehensive Guildford borough cycle network will improve the coherence, directness, safety, comfort and attractiveness of the routes, helping to realise Government ambitions for a significant uplift in cycling for short journeys. The design of cycle infrastructure will need to be appropriate to the constraints, traffic volumes and speeds of the route and will not always involve segregated cycle lanes.



Left blank	<p>The Policy also makes reference to sustainable movement corridors which have not been out for public consultation since inception some five years ago. This policy is therefore premature.</p>	<p>It is not considered that this policy is premature. The policy will provide a further basis for any forthcoming Sustainable Movement Corridor Supplementary Planning Document (SMC SPD), and in particular cycle elements of SPD. SPD is guidance which provides further detail to the policy. There is a commitment to produce a SMC SPD, as is referred to in the LPSS Policy ID3. This document will be subject to a formal consultation process. Further information on sections of the SMC constructed to date can be found on the GBC website - <a href="https://www.guildford.gov.uk/article/23035/Find-out-about-the-Sustainable-Movement-Corridor-project">https://www.guildford.gov.uk/article/23035/Find-out-about-the-Sustainable-Movement-Corridor-project</a>.</p>
Left blank	<p><b>Merrow Residents Association</b></p>	Left blank
Left blank	<p>We are surprised that an SMC is marked on figure 2 of this policy that runs along the Epsom Road through Merrow towards the Clandon Cross Roads. So far as we are aware this is the first time that this route has been described as an SMC and so far as we are aware there has been no consultation on describing this route in this way. We find it disappointing that this revelation has been hidden in this consultation. We are aware that there has been some suggestion that the SMC in Gosden Hill Farm might pass through Park Lane into Merrow but that is another matter.</p>	<p>The route that is shown along Epsom Road, through Merrow, towards Clandon crossroads is not described, or labelled, as an SMC. Instead, the proposed cycle route as it extends along Epsom Road from the junction with the Upper High Street to the junction with Park Lane is shown as a 'lower standard route' – mainly due to some narrow sections of Epsom Road identified by Transport Initiatives/Urban Movement. Beyond the Guildford urban area, the A25/A246 is shown as an 'existing and proposed route' to reflect the existing infrastructure which exists on sections of this route, but which could be upgraded to bring in line with current guidance.</p> <p>Figure 5 in the Strategic Development Framework SPD (consulted upon Jan-Feb 2020, adopted July 2020) - which was also previously published in the GBC-LPSS-25a examination document - showed the illustrative route of the SMC. This includes a potential additional or alternative section which is routed via the Epsom Road. However, this potential SMC section has not been included on the Policies Map as it is indicative.</p>

Left blank	<p>We urge GBC to produce a specific policy on the SMCs in the Borough on which there could then be a useful and constructive dialogue. This is a suggestion that we have put to a number of Borough Councillors on a number of occasions in the last few months.</p>	<p>There is a commitment to produce a Sustainable Movement Corridor SPD, as is referred to in the LPSS Policy ID3. This document will be subject to a formal consultation process.</p>
Left blank	<p>We are also concerned to note that the SMC is defined as a corridor serving Blackwell Farm, the Weyside Urban Village and Gosden Hill Farm- there is no mention of the SMC in Merrow. That definition needs to be revisited.</p>	<p>The following minor modification is suggested at para 6.81:  “Sustainable Movement Corridor - will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists, <u>including</u> serving the new communities at Blackwell Farm, Weyside Urban Village and Gosden Hill Farm.”</p> <p>There is a more detailed explanation of where the SMC is proposed to link in para 4.6.26 of the LPSS.</p>
Left blank	<p>We are also concerned at the assumption that if E-Scooters were to be legalised that they would be permitted to use dedicated cycle lanes. We are surprised at this unwarranted assumption bearing in mind the number of accidents that have been recorded between E-Scooter riders and cyclists.</p>	<p>The legal position in relation to these vehicles and where they can be used is a national matter and is therefore the responsibility of the Department for Transport (DfT).</p> <p>The following minor modification is suggested to address this comment, at para 6.94:  “If e-scooters were to be legalised <u>by Government or allowed as part of a Government sanctioned trial by Surrey County Council</u> - either privately owned e-scooters or as part of a public hire scheme, or both - it <del>is envisaged</del> <u>may be</u> that e-scooters would be treated in the same vein as pedal cycles and therefore able to be used on the road or <del>on</del>-dedicated cycling infrastructure.”</p>

Left blank	<b>Barton Willmore on behalf of Martin Grant Homes</b>	Left blank
Left blank	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.	When a future Local Cycling and Walking Infrastructure Plan (LCWIP) is taken forward, the fifth stage of this is to prioritise improvements. In the interim it is considered that developments will progress at different timescales over the lifetime of the Plan and any developer contributions would be related to the development.
Left blank	<p>With regard to the delivery of improvements as part of development proposals, whilst it is agreed that new developments should make reference to the proposed policy maps and enhance cycling where possible within their site, they should not be required to deliver new routes which are outside of their land control.</p> <p>For example, there is a suggested greenway shown along the southern boundary of the Gosden Hill development site in the Surrey County Council Guildford Local Cycling Plan Map (included at Appendix A) providing a link towards West Clandon. Whilst land could be provided within the</p>	<p>We consider that the Policy ID10, at part 3b) identifies the mechanisms for realising improvements of cycle routes and infrastructure on the public highway or land in the control of the Local Highway Authority.</p> <p>Planning obligations are required to meet the tests set out in the NPPF (2021), namely that they must only be sought where they meet all of the following tests a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development.</p> <p>We do not consider it is necessary to caveat any routes with the word indicative as per Policy ID10 part 1) which states that the routes and infrastructure which comprise the Comprehensive Guildford Borough Cycle Network "will be the basis and starting point for the identification of improvements". The majority of routes identified have only been established at a concept level and the identification of improvements will, in such cases, require feasibility and design stages to be undertaken. This will involve undertaking road safety auditing and impact assessments, as appropriate, taking into account any relevant statutory designations</p>

	<p>Gosden Hill site to deliver part of this route as part to addressing the requirements of Policy ID3 'Sustainable transport for new developments', the developer should not be required to deliver the whole route or any part of the route outside of their land control which may lead to potential ransom issues.</p> <p>In this context, we suggest any proposed routes within Appendix A are caveated with the word 'indicative'. This will allow for greater flexibility in providing these routes should the drawn routes not be possible due to land ownership or design constraints.</p>	
Left blank	<p><b>Quod on behalf of Portland Capital</b></p>	Left blank
Left blank	<p>Any requirement to deliver site-specific requirements for cycle infrastructure will have viability implications for deliverability which should be recognised in final policy wording. This is reflective of the consideration of viability set out at paragraphs 68 and 124 of the NPPF outlined previously.</p>	<p>The Development Plan should be read as a whole. Policy ID1 in the LPSS provides policy on infrastructure and delivery, including viability. The policy in the NPPF on viability can also be considered in the determination of planning applications. We therefore do not propose to modify the final policy wording in the manner suggested.</p>

Left blank	<p><b>Savills on behalf of Taylor Wimpey</b></p>	Left blank
Left blank	<p>The map supporting the policy is unjustified and ineffective based on the present evidence base. Some of the suggested routes are not within the public highway and take a different alignment to the routes agreed with Stakeholders TW have consulted.</p> <p>The mapped routes which comprise the 'Comprehensive Guildford Borough Cycle Network' found in Appendix A broadly reflect the routes TW are developing in consultation with Surrey County Council with input from the GBC transport adviser. However, they do not reflect the TW-proposed routes upon which TW has consulted with stakeholders. In some cases the routes shown could not be delivered within the adopted highway. In some other cases the routes take a different alignment.</p> <p>The map and Policy should therefore be updated to reflect this, or be sufficiency adaptable to</p>	<p>The comments describing Taylor Wimpey's stakeholder consultation relate to Taylor Wimpey's pre-application activities and processes with Surrey County Council and Guildford Borough Council. This work is ongoing and the planning application has not been submitted as of May 2022.</p> <p>Policy ID10 at point 1) states the routes and infrastructure which comprise the Comprehensive Guildford Borough Cycle Network "will be the basis and starting point for the identification of improvements". This is not inconsistent with Taylor Wimpey's description of their pre-application activities and processes. The majority of routes identified in Appendix A have only been established at a concept level and the identification of improvements will, in such cases, require feasibility and design stages to be undertaken. This will involve undertaking road safety auditing and impact assessments, as appropriate, taking into account any relevant statutory designations</p> <p>We consider that the Policy ID10, at part 3b) identifies the mechanisms for realising improvements of cycle routes and infrastructure on the public highway or land in the control of the Local Highway Authority.</p>

	<p>respond to ongoing discussions, and agreements with Surrey County Council supporting major development proposals. A fixed map is likely to be unjustified or ineffective.</p>	
Left blank	<p><b>Holy Trinity Amenity Group</b></p>	Left blank
Left blank	<p>We strongly protest at the absence of any similar policy for walking and pedestrians and are deeply disappointed that this obvious omission, that we raised in the previous consultation, has not been rectified.</p> <p>We ask for a commitment by GBC to produce a policy for walking and pedestrians, including production of a new Walking Strategy, and support for infrastructure improvements that would include 20mph limits, proper pedestrianisation, pedestrian priority crossings, refuge islands for crossing places, enforcement of no parking or driving on pavements, banning of A-boards, widening of pavements, prohibiting the various actions that involve</p>	<p>Surrey County Council has identified that it will be preparing Guildford LCWIPs - see officer report to Surrey County Council's Executive in October 2021, available as reference 193/21 Surrey Infrastructure Plan - Phase 1 Schemes at: <a href="https://mycouncil.surreycc.gov.uk/ieListDocuments.aspx?CId=120&amp;MId=7768&amp;Ver=4">https://mycouncil.surreycc.gov.uk/ieListDocuments.aspx?CId=120&amp;MId=7768&amp;Ver=4</a>.</p> <p>In the interim, we will rely on the NPPF paras 92 and 112 and Local Plan: Strategy and Sites Policies ID3 and D1.</p> <p>Surrey County Council as the Local Transport Authority consulted, in 2021, on its Local Transport Plan 2022-2032. This includes non-location specific proposals for introducing 20mph zones, place based measures including low-traffic neighbourhoods and school streets, high quality pedestrian and cycle routes with convenient crossing facilities and widened and high-quality footways as part of and making best use of traffic enforcement powers as Government makes them available.</p>

	use and blockage of pavements etc.	
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	Remove or reroute the green cycle route to the west of Guildford. The route 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. Further south, the proposed route passes through a belt of ancient woodland, which would potentially cause harm to this sensitive natural habitat.	The network of routes in this area will be amended to tie in with that identified in the Strategic Development Framework SPD (SDF SPD), albeit the full potential network in the heart of the Blackwell Farm site has not been reproduced from the SDF SPD.
Left blank	<b>CRPE</b>	Left blank
Left blank	The development of cycle networks must not result in the intensification and urbanisation of open countryside. The policy should be amended to ensure that “mechanisms for improvements resulting from new development” do not have the potential to harm the character and experience of the AONB and protect the openness of areas of Green Belt.	The Development Plan and the NPPF must be read as a whole and would be considered together with any requirements that the Local Highways Authority would require when undertaking improvement works on the public highway. Protections for the Green Belt and AONB are reflected in the NPPF and LPSS Policy P2 (in the case of the former).

Left blank	<b>Ripley Parish Council</b>	Left blank
Left blank	A realistic approach must be taken for developments in a more rural setting. The road width of most rural lanes simply cannot provide for cycle lanes, without severely compromising safety for cyclists and all other road users.	The design of cycle infrastructure will need to be appropriate to the constraints, traffic volumes and speeds of the route and may not always involve segregated cycle lanes. Further to this, the majority of routes identified have only been established at a concept level and the identification of improvements will, in such cases, require feasibility and design stages to be undertaken. This will involve undertaking road safety auditing and impact assessments, as appropriate, taking into account any relevant statutory designations

## Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	One of the evidence sources quoted is the council's 'concept proposals for the routing of the Sustainable Movement Corridor'. A position statement on the status of the SMC should be issued and regularly updated to inform the planning process given that the implementation of the SMC is going to take place in stages, and there is currently a degree of uncertainty about the specification and phasing.	<p>There is a commitment to produce a Sustainable Movement Corridor SPD, as is referred to in the LPSS Policy ID3. This document will be subject to a formal consultation process.</p> <p>Further information on sections of the SMC constructed to date can be found on the GBC website - <a href="https://www.guildford.gov.uk/article/23035/Find-out-about-the-Sustainable-Movement-Corridor-project">https://www.guildford.gov.uk/article/23035/Find-out-about-the-Sustainable-Movement-Corridor-project</a>.</p>



		The development and delivery of projects by Guildford BC or Surrey County Council is subject to reporting and approval processes to committees where appropriate.
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## Policy ID11: Parking Standards

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	<p>Any mention of electric vehicle charging points (EVCP) should be changed to include the minimum standard of fast-charge points. Our transport policy team have advised that the current minimum requirements are for a 7kw Mode 3 with Type 2 connector – 230v AC 32 Amp single phase dedicated supply.</p>	<p>The draft Parking SPD contained the requested specification in Table C1 in the column headed ‘Charge Point Specification’. This was referred to from Policy ID11, 2) e) and 3) e). After the consultation on the Regulation 19 document had begun, ‘Approved Document S: Infrastructure for the charging of electric vehicles’ was published by the UK Government and will take effect on 15 June 2022. A proposed minor modification, at point 2) e) for strategic sites and at point 3) e) for non-strategic sites, states that “the provision of electric vehicle charging will provide at least the minimum requirements set out in the <a href="#">Parking SPD Building Regulations (Part S)</a>”. Further information in relation to the technical requirements which would be required to meet the Building Regulations can be found in Approved Document S.</p>
A response to the draft Parking SPD consultation which covers	<p>We note that for planning applications at non-strategic sites, Neighbourhood Plans, which are likely to contain minimum parking standards, will be given weight where they exist. We would like to support the implementing of ‘Maximum [car parking] Provisions’ as set out in Policy ID11 for all sites across the borough, not just those that are strategic.</p>	<p>Following feedback to the Regulation 18 consultation it was apparent that there was a strong desire for parking standards in existing and emerging Neighbourhood Plans to have primacy in those areas to which they apply. If the parking standards for both strategic and non-strategic sites were contained in the LPDMP and the policy did not give primacy to Neighbourhood Plans, these would, upon the</p>

<p>policy matters.</p>		<p>adoption of the LPDMP, supersede parking standards contained within existing Neighbourhood Plans as the most recently adopted Development Plan Document (DPD).</p> <p>However, the parking standards for strategic sites have been included in the Appendix of the DPD, cross-referenced from the policy. The rationale for this was due to the concern, that where a strategic site was located wholly or in part in a designated neighbourhood area, that a Neighbourhood Plan may set parking standards (generally minimums for off-street provision of car parking spaces) that could compromise the Council's objectives for sustainable development at these important sites and would, as a DPD, take precedence in all instances. There is a desire by the Council to address this circumstance, which it considers can most appropriately be achieved through setting policy direction and numerical standards for strategic sites as a strategic policy within the Local Plan owing to their strategic importance. This also ensures that these standards are not superseded by any subsequent Neighbourhood Plans or Neighbourhood Plans that are reviewed.</p> <p>For non-strategic sites in the town centre and suburban areas which are also outside Neighbourhood Planning areas, maximum residential car parking standards are set through the draft Parking SPD. Maximum parking standards are appropriate in the borough's urban areas in order to manage the local road network – with its challenges particularly of congestion, local air quality and severance – and also for optimising the density of development in urban centres and other locations that are well served by public transport. Further, this policy approach also allows for new developments to shape travel demands in ways that are cognisant of national and local Net Zero targets.</p>
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		Further, maximum non-residential car parking standards are set for all development and development locations in the borough given the importance of limiting parking at the destination, albeit Neighbourhood Plans will be able to set non-residential car parking standards except for on the strategic sites.
Left blank	<b>National Highways</b>	Left blank
Left blank	<p>The proposed policy covers a wide range of uses with maximum, minimum or expected numbers of parking spaces. One of the biggest opportunities for managing down traffic demand on the Strategic Road Network (SRN) is associated with limiting [car] 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>The draft policy provides for maximum vehicle parking standards for non-residential developments (the destination), except for some development types for which individual assessment and justification is required.</p> <p>The draft policy requires that for the provision of either car-free development or development in which the provision of parking is at lower than the defined maximum standards then this 'must be justified by a coherent package of sustainable transport measures'. Criteria are set out including for 'high public transport accessibility', as well as to requirements for 'excellent quality of walking and cycling access' to appropriate centres. We consider applicants should be able to take into account the qualities of bus and rail services, both existing and planned, as part of their evidence in respect of a development's public transport accessibility.</p> <p>The Development Plan, of which the draft LPDMP will form part as and when it is adopted, also includes the adopted LPSS. Policy ID3 Sustainable Transport for New Developments of the LPSS requires, at point 6), that 'New development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable...' as well other requirements for specific transport infrastructure and</p>

		services set out in the Infrastructure Schedule, which can be updated through revisions of the Guildford borough Infrastructure Delivery Plan, as well as in the site policies. The Infrastructure Schedule includes various proposed bus and rail schemes.
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### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	Revise and increase the number of [residential] car parking spaces in rural areas/villages to lessen the impact of inappropriate and pavement parking. The modal shift towards more sustainable transport is not happening. One of the new [residential] developments recently completed at Site A36 (10 new homes) on Saturday 13th February had a car in each parking space, the visitor spaces were full, and four additional cars were parked across the new pavements.	<p>In rural and village areas, the proposed expected standards for residential car parking match current levels of car availability, which are themselves reflective of differences in accessibility to key services and facilities by non-car modes. They are set at, or rounded up from (to the nearest .5), the average car availability levels observed. Furthermore, the policy allows for provision of unallocated parking, which can accommodate variation in car ownership/availability levels from household to household, as well as allowing for visitors, deliveries and servicing.</p> <p>Draft Policy ID11 5) d) states that “development proposals will be required to demonstrate that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users.”</p> <p>The Council’s proposed parking standards, if in place, would require a greater quantum of vehicle parking for a</p>

		<p>development with the specification of that described. In short, the application of the Council's proposed parking standards would suggest an 'expected' provision of 24 spaces including 2 visitor spaces compared to the 20 all-allocated spaces provided. In addition, the restricted internal dimensions of at least half of the garages in the permitted development would not count as providing a car parking space using the Council's proposed parking standards.</p>
Left blank	<b>Merrow Residents Association</b>	Left blank
Left blank	<p>The proposed Policy ID11 is an almost complete reversal [of that proposed in the Regulation 18 consultation] and now sets maximum [car parking] standards across all suburban areas and strategic sites. We fail to understand why this unacceptable change has been made. The rationale has not been explained either in the policy or in the SPD except by saying that the policy must cater for new developments where there will be no car parking provisions at all.</p>	<p>The draft Parking Standards Topic Paper, which was available alongside the Regulation 19 consultation, explains the evolution of the residential car parking standards from pages 10-25, based on further analysis of average car availabilities for each of the area typologies using Census data. The Reasoned Justification for the Policy should set out and explain the approach of the policy, as opposed to any policy evolution.</p> <p>Further, clarification of the approach has been given at para 6.119 of the Reasoned Justification to Policy ID11, which now states: "<u>Maximum parking standards are appropriate in the borough's urban areas in order to manage the local road network – with its challenges particularly of congestion, local air quality and severance – and also for optimising the density of development in urban centres and other locations that are well served by public transport. Further, this policy approach also allows for new developments to shape travel demands in ways that are cognisant of national and local net-zero targets.</u> Recent research has identified that modal shift is required at a UK scale to meet the Government's net-zero policy. The Committee on Climate Change's (2019) net-zero scenarios assume a 10% transport modal shift from private cars to other modes of transport by 2050. Similarly, Transport</p>

		<p>for Quality of Life (2018) find that ‘electrification [of vehicles] is insufficient on its own, and demand management to reduce traffic volumes will also be necessary.’</p>
<p>Left blank</p>	<p>We believe the setting of maximum [car] parking standards for suburban areas, including strategic sites, is fundamentally flawed: land is expensive in Guildford and no developer is likely to allocate more space for parking than the design and, crucially, location of the development justifies.</p>	<p>The maximum car parking standards for residential development are set at, or rounded up from (to the nearest .5), the average car availability levels observed in the Census data for the town centre and suburban areas. The policy gives flexibility in application, with additional unallocated parking required for visitors, deliveries and servicing at a rate of 0.2 spaces per dwelling applied only in circumstances where 50% or more of the total number of spaces, provided by use by residents themselves, is allocated. The non-residential car parking standards are based on those recommended by Surrey County Council as the Local Highway Authority. As stated in the reasoned justification at para 6.124 “Restricting car parking at the destination has been proven to influence mode choice. A study of commuters working in Cambridge investigated statistical associations between mode choice and personal and environmental characteristics (Dalton et al, 2013). Car availability was found to be a strong predictor of mode of travel to work and the absence of free car parking at work was associated with a markedly higher likelihood of walking, cycling, and public transport use.”</p>

Left blank	<p>We note that the National Planning Policy Framework (NPPF), Section 9, "Promoting Sustainable Transport" specifically advises against setting maximum standards other than in special cases. We recommend strongly that ID11 should set only minimum [car] parking standards in all areas of Guildford, including strategic sites and that these standards should reflect at the very least the current, (though frequently inadequate), levels.</p>	<p>The NPPF states that, at para 108, "Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework)."</p> <p>We consider that maximum car parking standards are necessary in urban areas in Guildford borough to manage the local road network. Congestion and various traffic externalities particularly affect the urban areas. In addition to congestion and traffic externalities which include local air pollution and severance, there is an opportunity to make more efficient use of land in the urban areas, with specific opportunities in Guildford town centre which is well served by public transport.</p>
Left blank	<p><b>Barton Willmore on behalf of Martin Grant Homes</b></p>	Left blank
Left blank	<p>As drafted, for strategic sites some requirements are set out in ID11 and the supporting appendices while other are detailed in the draft Supplementary Planning Document (SPD). For clarity and to ensure the policy is effective, we recommend that all information is provided within the policy. In this context, the need for an SPD is unclear.</p>	<p>At the Regulation 19 consultation stage, the standards for the strategic sites were split between an appendix to the LPDMP (for residential and non-residential car and cycle parking) and the draft Parking SPD (for EVCP provision), which was also consulted on from 21 January to 18 February 2022.</p> <p>Whilst there was an ambition initially for all parking standards for strategic sites to be contained in DPD, there was an acknowledgement that EVCP standards were likely to be introduced into Building Regulations in 2022. Thus, the inclusion of EVCP standards in the draft SPD was intended to reflect the rapid evolution of Government ambitions and requirements relating to EVCP in the time since the drafting</p>



		<p>of the Regulation 18 consultation document and the potential for further change over the plan period. As such, it was considered advantageous to set out EVCP standards for residential and non-residential development on both strategic and non-strategic sites in an SPD, which would provide greater flexibility for update.</p> <p>With the release, after the consultation on the Regulation 19 document had begun, of 'Approved Document S: Infrastructure for the charging of electric vehicles' by the UK Government, it is now confirmed that EVCP provision will be included within Building Regulations. Therefore, we propose a minor modification at point 2) e) of Policy ID11 stating that "the provision of electric vehicle charging will provide at least the minimum requirements set out in the <a href="#">Parking SPD Building Regulations</a>" (also repeated at 3) e) for non-strategic sites). With this change, no numerical parking standards for strategic sites are now included in SPD.</p> <p>In spite of this, the need for an SPD remains clear for a number of reasons. First, for non-strategic sites the inclusion of standards in the Local Plan (as opposed to SPD) was considered to be potentially inflexible (in the context of changing circumstances) and problematic in terms of the proposed approach to give primacy to Neighbourhood Plans and their setting of local parking standards (as the LPDMP would – unless specific provision is made otherwise in the LPDMP policy – supersede parking standards in existing Neighbourhood Plans). Thus, for non-strategic sites, the Council propose a more flexible approach, allowing for the nimble adjustment of parking requirements responding to future trends. This is considered to be most appropriately achieved by including these standards within the Parking SPD, with the SPD referenced in Policy ID11.</p>
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		<p>This approach also aligns with the intent to enable future Neighbourhood Plans to set their own local standards except in relation to strategic sites, alongside retaining those standards already set by Neighbourhood Plans (for non-strategic sites). It also provides clear and justified standards for areas that do not benefit from a Neighbourhood Plan along with the opportunity for a new Neighbourhood Plan to partially or wholly ‘hook in’ SPD standards within its policies.</p> <p>Finally, the draft Parking SPD contains considerable design guidance which would be too large to contain in, and beyond the reasonable scope of, the LPDMP.</p>
Left blank	<p>We recommend that 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.</p>	<p>The car parking standards for the strategic sites are maximum standards, for both residential and non-residential development. This provides the opportunity for an applicant to bring forward low-car proposals for a strategic site or for areas of a strategic site. The policy requires that low-car and car-free propositions are to be justified by a coherent package of sustainable transport measures.</p> <p>Further, a section entitled “<i>Future conversion and repurposing of car parking spaces</i>” is included in the draft Parking SPD, paras 5.29 to 5.31.</p>
	<p>We broadly agree with the cycle parking standards set out in Table B3 but note this includes a split for both long and short stay across many land use categories. Whilst the type and placement of cycle parking may vary depending on duration it is recommended that a flexible approach is taken on the type of provision required.</p>	<p>Further guidance on the type and placement of cycle parking best suited to various residential and non-residential development set out in the draft Parking SPD. As stated in para 6.128 of the Reasoned Justification for Policy ID11: “Cycle parking should be as convenient, if not more, than access to car parking.” It is also recommended that cycle parking should be designed into developments from the early stage of design.</p>

<p>A response to the draft Parking SPD consultation which covers policy matters.</p>	<p>Flexibility regarding garage layout to accommodate cycle parking should extend further to capture the potential of standalone provision within property curtilage.</p>	<p>There is the opportunity for cycles to be accommodated in a standalone structure, in which case a garage would follow 6m x 3m, as indicated in Manual for Streets.</p>
<p>Left blank</p>	<p><b>Home Builders Federation</b></p>	<p>Left blank</p>
<p>Left blank</p>	<p>This policy is not legally compliant and inconsistent with national policy.</p> <p>The Council cannot set policy outside of the local plan and as such it cannot require development to accord with guidance. If the Council wishes to set a standard with regard to parking, then this must be set out in the local plan to ensure that any changes to these standards are considered through the proper process of consultation and examination. If the Council wishes to refer to guidance, then it should be clear that development will need to take account of this guidance but not that it must accord with it.</p>	<p>We have prepared the Policy and a draft Parking SPD in parallel, which will allow the inspector who will examine the Submission version of the LPDMP to consider GBC's proposed approach, as follows.</p> <p>As discussed in Chapter 4 of the draft Parking Standards Topic Paper, which was available alongside the Regulation 19 consultation, there is no clear approach to the setting of parking standards across Local Planning Authorities with both a mix of DPD and SPD containing parking standards.</p> <p>There is a concern, specifically in relation to strategic sites, that Neighbourhood Plans may set car parking standards (generally minimums) that could compromise the Council's objectives for sustainable development at these sites. If parking standards were contained within an SPD, Neighbourhood Plans would, as DPDs, take precedence in all instances. There is a desire by the Council to address this potential scenario, which it considers can most appropriately be achieved through setting policy direction and numerical standards for strategic sites as a strategic policy within the Local Plan owing to such a policy's strategic importance. This</p>

		<p>also ensures that these standards are not superseded by any subsequent Neighbourhood Plans or their review.</p> <p>Concurrently, the Council consider that there is value in providing clarity with regard to parking standards in relation to non-strategic sites in the borough. However, inclusion of these standards in the Local Plan (as opposed to SPD) was considered to be potentially inflexible (in the context of changing circumstances) and problematic in terms of the proposed approach to allow primacy to Neighbourhood Plans and their setting of local parking standards. Thus, for the non-strategic sites, the Council propose a more flexible approach, allowing for nimble adjustment of parking requirements responding to future trends. This is considered to be most appropriately achieved by including these standards within the draft Parking SPD, with the draft SPD referenced in Policy ID11.</p> <p>This approach also aligns with the intent to enable future Neighbourhood Plans to set their own local standards except in relation to strategic sites, alongside retaining those standards already set by Neighbourhood Plans (for non-strategic sites). It also provides clear and justified standards for areas that do not benefit from a Neighbourhood Plan along with the opportunity for a new Neighbourhood Plan to partially or wholly 'hook in' SPD standards within its policies.</p> <p>Likewise, and specifically in relation to EVCP, in the time since the drafting of the Regulation 18 consultation document there has been a rapid evolution of Government ambitions and requirements relating to EVCP, culminating in the confirmation that EVCP provision will be included within the Building Regulations. As such, the policy now, for both strategic and non-strategic sites, refers to the Building Regulations as minimum provision to be provided.</p>
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Left blank	<p>It will not be necessary for further EVCP standards to be set out in local plans given the Government's intentions to bring forward regulations to mandate EVCPs. Whilst the Council have not set out their specific standards in the local plan it does make reference to the electric vehicle charging in points 2e and 3e of this policy. Given the Government's intentions we would suggest both of these points are removed from the policy.</p>	<p>After the consultation on the Regulation 19 document had begun, 'Approved Document S: Infrastructure for the charging of electric vehicles' was published by the UK Government and will take effect on 15 June 2022. A proposed minor mod, at point 2) e) for strategic sites and at point 3) e) for non-strategic sites, states that "the provision of electric vehicle charging will provide at least the minimum requirements set out in the <a href="#">Parking SPD Building Regulations (Part S)</a>".</p> <p>Whilst Building Regulations ensure that EVCPs will be provided for new development, material change of use or redevelopment of residential and non-residential buildings with car parking spaces, the inclusion of minimum standards in Policy ID11 allows for increased provision of EVCP to be taken into account by the planning decision maker.</p>
Left blank	<p>If the Council requires development to meet any proposed standards it will be important that full and proper consideration is given in the viability assessment as to the impact of requiring EVCPs. The Council's policy approach should not compromise the viability of development. The Council's viability assessment includes an allowance £500 per dwelling. However, the evidence supporting the Government's response to the consultation on EVCPs estimated an installation cost of between £615 to £1,115 per EVCP for off-street parking and between £975 and £2,947 per charge point for multi-occupancy surface parking. An allowance for such infrastructure should be explicitly included in the Council's viability assessment.</p>	<p>The £500/dwelling assumption (applied to all dwellings) is one that similar viability assessments have used.</p> <p>The Council's consultants have assumed £500 which includes our allowance for increasing market standardisation and reducing costs over time.</p> <p>Nevertheless, and although there are other cost contingency elements allowed for, it is acknowledged that in some cases the costs could amount to more than the explicit £500/dwelling allowance made. It is not appropriate to assume all high-end estimates/worst-case potential costs but were additional costs to be required as per the Department for Transport/ Office for Zero Emission Vehicle's estimates, this would not be a factor that amongst the many variables in overall viability would make a material difference to outcomes. Either way, these are cost levels that represent a very small proportion of overall cost or value on a scheme.</p>

	<p>There are also serious concerns about the capacity of the existing electrical network in the UK. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. Therefore, an allowance for such infrastructure should be explicitly included in the Council's viability assessment.</p>	<p>In terms of the power network capacity, while it is understood that in some instances there may be power network capacity issues, the nature and extent of these is not known and is perhaps unlikely to be until particular schemes are in planning phases. This is not expected to be an issue that impacts all developments. Therefore, rather than being an unknown variable reflected through specific assumptions in all local plan level tests, this is considered likely to be more appropriately tackled where relevant in the same way that other site-specific abnormal costs are. However, having noted the uncertainties and acknowledged that there may be potential cost implications, the Council is also of the view that network reinforcements will likely not all be funded by developments – there will be a role for investment by the network and charging providers who will distribute and sell the electricity used.</p>
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	<p>The developments proposed and new planning applications must have adequate parking provision. On street parking is not an alternative and developers should not rely on it.</p>	<p>Policy ID11 5) d) states that “development proposals will be required to demonstrate that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users.”</p>
Left blank	<b>Quod on behalf of Portland Capital (Iceni responded to SPD on behalf of Portland Capital)</b>	Left blank
Left blank	<p>Policy ID11 criteria 2c and 2e for strategic sites are the same as criteria 3c and 3e for non-strategic sites. The policy could be made clearer and simplified if these points are included under criteria 5 for all sites.</p>	<p>It is considered that the proposed drafting which splits out the policy elements into requirements for ‘strategic sites’ and ‘non-strategic sites’ gives clarity to the car, cycle parking and EVCP standards and keeps the numerical aspects of policy</p>

		together in the appendix to the LPDMP and the SPD for the 'strategic sites' and the 'non-strategic sites' respectively.
Left blank	<b>Iceni Project Limited on behalf of Portland Capital</b>	Left blank
A response to the draft Parking SPD consultation which covers policy matters.	Policy ID11 is generally clear as much of the detail is referred to in the Draft SPD, however, the wording within Policy ID11 for points 2)b and 2)c for strategic sites are essentially the same as points 3)c and 3)e for non-strategic sites. To simplify the policy these sentences could be covered under point 5) For all sites.	It is considered that the proposed drafting which splits out the policy elements into requirements for 'strategic sites' and 'non-strategic sites' gives clarity to the car, cycle parking and EVCP standards and keeps these numerical aspects of policy together in the appendix to the LPDMP and the SPD for the 'strategic sites' and the 'non-strategic sites' respectively.
A response to the draft Parking SPD consultation which covers policy matters.	Despite the requirement for 'Individual assessment/justification' to be undertaken there is no guidance is provided as to the criteria in which this assessment/justification needs to adhere to, which could lead to some discrepancy between sites and determining what extent of work is necessary and the factors which would suggest a site to be accessible, or not. Additionally, as with other authorities, there can be scale used to show how accessible a site is e.g., Poor, Good, Excellent.	It is recommended that the appropriate approach to assessment and justification, including in terms of methodology and evidence, would be established in discussion with Surrey County Council as the Local Highway Authority.
A response to the draft Parking SPD consultation which covers	It is assumed that, in Table A4 of the Draft Parking SPD, Residential would include for Residential Institutions as well as Dwelling houses, but it would be useful to clarify.	Table A4, in Appendix A of the draft Parking SPD (the contents of this table are duplicated as Table B3 in Appendix B of the LPDMP, minimum provision of cycle parking for residential and non-residential development) states that 'residential' includes 'All except sheltered/elderly housing or nursing homes' with separate standards for 'Sheltered/elderly housing or nursing homes'. This mirrors the

policy matters.		suggested guidance in the DfT's LTN 1/20 Cycling Infrastructure Design.									
A response to the draft Parking SPD consultation which covers policy matters.	The absence of a standard for the minimum provision of short-stay for residential use leads to a concern in regard to cycle parking for visitors.	<p>Proposed minor modification, Table A4 of Appendix A and B3 of Appendix B in the draft Parking SPD (and Table B3 of Appendix B in the LPDMP):</p> <table border="1"> <thead> <tr> <th>Development Type</th> <th>Minimum cycle parking spaces provided – short stay</th> <th>Minimum cycle parking spaces provided – long stay</th> </tr> </thead> <tbody> <tr> <td colspan="3">Residential</td> </tr> <tr> <td>All except sheltered/ elderly housing or nursing homes</td> <td><u>Individual assessment/ justification</u></td> <td>1 per bedroom</td> </tr> </tbody> </table> <p>Further information in terms of the location of short stay cycle parking can be found in the draft Parking SPD, page 5.46.</p>	Development Type	Minimum cycle parking spaces provided – short stay	Minimum cycle parking spaces provided – long stay	Residential			All except sheltered/ elderly housing or nursing homes	<u>Individual assessment/ justification</u>	1 per bedroom
Development Type	Minimum cycle parking spaces provided – short stay	Minimum cycle parking spaces provided – long stay									
Residential											
All except sheltered/ elderly housing or nursing homes	<u>Individual assessment/ justification</u>	1 per bedroom									
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank									
Left blank	We support the hierarchy of Neighbourhood Plans taking precedence over local plan policies but are extremely disappointed that the general [car] parking standards have the word Maximum included within them. When it is very clear that research done by Neighbourhood Forums, and the resulting Neighbourhood Plans democratically voted on, justify the need for Minimum standards for their communities.	<p>Parking policy resides at the heart of an integrated land use and transport strategy. Policy ID11 gives primacy to the parking standards set in Neighbourhood Plans, except in relation to strategic sites. In other areas of the borough, including the strategic sites, a strategic policy approach has been proposed.</p> <p>This strategic policy approach involves the application of maximum car parking standards in the borough's urban</p>									



	<p>To accept that Neighbourhood Plans are correct, then claim everyone else in the Borough should suffer a maximum standard is incoherent and disjointed.</p>	<p>areas and strategic sites. We consider that maximum parking standards are appropriate in the borough's urban areas in order to manage the local road network – with its challenges particularly of congestion, local air quality and severance – and also for optimising the density of development in urban centres and other locations that are well served by public transport. Further, this policy approach also allows for new developments to shape travel demands in ways that are cognisant of national and local Net Zero targets. For rural and village areas, with the exception of areas with Neighbourhood Plans, the residential car parking standards are expected standards, not maximums.</p> <p>The Council's proposed approach will be tested at the examination stage by the Inspector.</p>
Left blank	<p>The policy needs to be supported with firm Monitoring indicators and Quantifiable measured real-world Targets. – with reference to real life scenarios.</p>	<p>The proposed monitoring indicator is designed to assess the coherence of the policy when it has been used by the LPA to justify the refusal of planning permission.</p> <p>Ultimately the policy will be tested through the appeal process. Furthermore, the monitoring is undertaken by the Planning Policy team and needs to be proportionate. Monitoring of many issues is also undertaken by other GBC departments and external organisations.</p>
<p>A response to the draft Parking SPD consultation which covers</p>	<p>The suggested use of maximums for [car] parking standards in non- Neighbourhood Plan areas in the Borough are opposed. Surrey County Council, as Highway Authority, states in its own guidance that 'it is recognised that the county exhibits a wide range of social and economic circumstances that necessitate a flexible approach to identifying appropriate levels of car parking provision.' Imposing artificial maximums across</p>	<p>Parking policy resides at the heart of an integrated land use and transport strategy. Policy ID11 in the LPDMP, from which the draft Parking SPD hangs, gives primacy to the parking standards set in Neighbourhood Plans, except in relation to strategic sites. In other areas of the borough, including the strategic sites, a strategic policy approach has been proposed.</p>

<p>policy matters.</p>	<p>the Borough via this SPD is counter-intuitive to this need for flexibility.</p>	<p>This strategic policy approach involves the application of maximum car parking standards in the borough's urban areas and strategic sites. We consider that maximum parking standards are appropriate in the borough's urban areas in order to manage the local road network – with its challenges particularly of congestion, local air quality and severance – and also for optimising the density of development in urban centres and other locations that are well served by public transport. Further, this policy approach also allows for new developments to shape travel demands in ways that are cognisant of national and local Net Zero targets.</p> <p>In village and rural areas, the strategic policy approach provides for expected standards for residential parking, and maximum parking standards for non-residential development.</p> <p>For both urban areas and village and rural areas, the methodological approach used to calculate the proposed residential car parking standards was based on calculating average car availabilities for each of the area typologies using Census data, and so are reflective of relative accessibility of the different area types to key services and facilities by non-car modes.</p> <p>The Council's proposed approach will be tested at the examination stage by the Inspector.</p> <p>Whilst a Plan-led system is based on Development Plan Documents with Supplementary Planning Documents providing guidance, there is discretion for the planning decision taker in considering planning applications.</p>
<p>A response to the draft Parking SPD</p>	<p>The adoption of borough-wide maximum [car parking] standards outside of neighbourhood plan areas is not in compliance with the NPPF as no 'clear and compelling' justification has been presented in the parking Topic</p>	<p>In village and rural areas, in areas without a Neighbourhood Plan, the strategic policy approach provides for expected standards for residential parking.</p>

<p>consultation which covers policy matters.</p>	<p>Paper or SPD. Indeed, the parking topic paper acknowledges a direct trend between increased housing development and increased car ownership. No evidence has been presented in the Topic Paper to suggest future trends will differ.</p>	<p>Clarification has been made at para 6.119 of the Reasoned Justification in relation to the maximum standards of Policy ID11, which now states: <u>“Maximum parking standards are appropriate in the borough’s urban areas in order to manage the local road network – with its challenges particularly of congestion, local air quality and severance – and also for optimising the density of development in urban centres and other locations that are well served by public transport. Further, this policy approach also allows for new developments to shape travel demands in ways that are cognisant of national and local net-zero targets.</u> Recent research has identified that modal shift is required at a UK scale to meet the Government’s net-zero policy. The Committee on Climate Change’s (2019) net-zero scenarios assume a 10% transport modal shift from private cars to other modes of transport by 2050. Similarly, Transport for Quality of Life (2018) find that ‘electrification [of vehicles] is insufficient on its own, and demand management to reduce traffic volumes will also be necessary.”</p> <p>The draft Parking Standards Topic Paper, which was available alongside the Regulation 19 and draft Parking SPD consultations highlights, in Chapter 4 at ‘<i>Potential for growth since 2011</i>’, that the increase in licenced vehicles approximately tracks the increase in the housing stock and as such, average car availability rates per household within the borough have not changed substantially over this time. It did not show there was a direct trend between increased housing development and increased car ownership.</p> <p>The draft Topic Paper highlights, in Chapter 4, that travel demand is evolving as a result of a number of trends, as discussed in research by the Commission of Travel Demand (an independent group which has been assembled as part of the Research Council UK funded DEMAND Centre).</p>
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<p>A response to the draft Parking SPD consultation which covers policy matters.</p>	<p>The general turnaround in the Council's position between Regulation 18 and Regulation 19 stages has not been adequately explained or justified.</p>	<p>The draft Parking Standards Topic Paper, which was available alongside the Regulation 19 and draft Parking SPD consultations, explains the evolution of the residential car parking standards from pages 10-25, based on further analysis of average car availabilities for each of the area typologies using Census data. The Reasoned Justification for the Policy should set out and explain the approach to the policy, as opposed to any policy evolution.</p>
<p>A response to the draft Parking SPD consultation which covers policy matters.</p>	<p>We oppose the continued use of half parking spaces (0.5) spaces in standards for all developments. The SPD should specify that such requirements be rounded up, not down, in all circumstances.</p>	<p>The use of parking standards including half spaces per property (e.g. 1.5 spaces per unit for a 2 bed house on a strategic site) allows car parking standards to be set at values which most accurately reflect the observed car availability levels in the borough.</p> <p>When it comes to calculating the provision of off-street spaces for the development as a whole, the per-unit benchmarks for the housing mix will be added up, and any adjustment for the visitor, servicing and delivery parking applied. The total resulting number will be a whole number or will be rounded to a whole number. It may be appropriate to round up in the case of a village and rural setting whereas in an urban setting where maximums are to be applied, provision will be rounded down.</p>
<p>Left blank</p>	<p><b>Savills Planning on behalf of St Edward Homes Ltd</b></p>	<p>Left blank</p>
<p>A response to the draft Parking SPD consultation</p>	<p>Residents who live in city/ town centres in apartment developments typically own smaller vehicles (as opposed to the larger vehicles evidenced in the Parking SPD). It is suggested that the Parking SPD (and Policy ID11 of the proposed LPDMP) includes some flexibility</p>	<p>Evidence has not been given to quantify this claim, however new cars typically have larger dimensions than in previous times, as evidenced in the draft Parking Topic Standards Paper. The guidance concerning bay dimensions which</p>

<p>which covers policy matters.</p>	<p>to allow 2.4m X 4.8m spaces to be incorporated into schemes where it can be justified on a case by case basis. Such as for urban apartment developments with basement parking.</p>	<p>advocates a dimension of 2.4m x 4.8m has not changed since specified by the Government in PPG 13, 1994.</p>
<p>A response to the draft Parking SPD consultation which covers policy matters.</p>	<p>There is no need for every space to have a charging point (or the enabling infrastructure). St Edward propose that similar standards are adopted to those in the Surrey County Council Electric Vehicle Strategy 2018 for flatted developments. This would include 20% of spaces to have fast charge connections and a further 20% passive (i.e. with enabling infrastructure). This is particularly suitable for unallocated parking provision.</p>	<p>The proposals for EVCPs followed the Government’s plans for the provision of EVCPs to be installed via Building Regulations. After the consultation on the Regulation 19 document had begun, ‘Approved Document S: Infrastructure for the charging of electric vehicles’ was published by the UK Government and will take effect on 15 June 2022. As a consequence, we have proposed a minor modification, at point 2) e) for strategic sites and at point 3) e) for non-strategic sites, states that “the provision of electric vehicle charging will provide at least the minimum requirements set out in the <a href="#">Parking SPD Building Regulations (Part S)</a>”. Given the Government’s ambition to phase out the sale of petrol and diesel cars by 2030 this requirement is necessary in order to allow residents the opportunity to charge at home.</p>
<p>Left blank</p>	<p><b>Guildford Society</b></p>	<p>Left blank</p>
<p>Left blank</p>	<p>Should a comment be added to Reasoned Justification that: new developments should consider how car parking is planned to allow for reversion of parking areas to open space, or more accommodation. An example is that small temporary at edge Multi-storey parking might be provided that can be redeveloped as car numbers decline.</p> <p><i>[We assume that “small temporary at edge multi-storey parking” refers to a small temporary car park towards the edge of a development.]</i></p>	<p>A section entitled “<i>Future conversion and repurposing of car parking spaces</i>” is included in the draft Parking SPD, paras 5.29 to 5.31.</p>

Left blank	<b>Guildford Residents Association</b>	Left blank
Left blank	<p>We strongly oppose the use of maximum [car] parking standards in the mistaken belief this is a good way to drive behaviour change. The priority should be to reduce personal car use and promote more benign power sources, not necessarily to reduce car ownership. It is availability of attractive public transport that meets needs that drives behaviour change not removal of parking spaces. Inadequate parking provision simply pushes parking into surrounding residential areas, adds to on street parking issues and leads to loss of greenspace, landscaping and permeable surfaces in development as occupants seek to create off street parking spaces over time.</p>	<p>Parking policy resides at the heart of an integrated land use and transport strategy. Provision for car parking in new developments is one piece of the jigsaw which sets direction and complements other sustainable transport initiatives. Likewise, maximum car parking standards aim to help address congestion and other traffic externalities experienced in the local area in part as a consequence of current levels of private car usage which is itself facilitated by car ownership/availability.</p>
Left blank	<p>Instead, policy should provide for adequate well landscaped parking that does not dominate the street scene. Provision should be consistent with access to sustainable means of travel, availability of convenient electric/hydrogen powered car club vehicles, space for personal electric/hydrogen vehicles where required including vans for business use and recreation, and space for delivery vehicles and visitors.</p>	<p>It is considered that the draft policy does provide for development proposals to be brought forward which will be able to provide numerically adequate parking provision (based from Census data) and, in combination with other policy requirements, well landscaped parking that would not dominate the street scene.</p> <p>The methodological approach used to calculate the proposed residential car parking standards, based on calculating average car availabilities for each of the area typologies using Census data, are reflective of relative accessibility of the different area types to key services and facilities by non-car modes.</p> <p>The policy identifies access to a car club as an element to be demonstrated in car-free development propositions, and this could also be taken into account for low-car development propositions.</p>

		<p>The policy, in combination with the draft Parking SPD, sets minimum requirements for EVCP. After the consultation on the Regulation 19 document had begun, 'Approved Document S: Infrastructure for the charging of electric vehicles' was published by the UK Government and will take effect on 15 June 2022. As a consequence, we have proposed a minor modification, at point 2) e) for strategic sites and at point 3) e) for non-strategic sites, states that "the provision of electric vehicle charging will provide at least the minimum requirements set out in the <a href="#">Parking SPD Building Regulations (Part S)</a>". Finally, the policy, and in combination with the draft Parking SPD for non-strategic sites, includes standards for the provision of additional unallocated parking to allow for visitors, deliveries and servicing. This applies only in instances where the majority of car parking spaces are allocated.</p>
Left blank	<b>Guildford Residents Association (Richard Jarvis)</b>	Left blank
<p>A response to the draft Parking SPD consultation which covers policy matters.</p>	<p>There is surely a case for including the standards for Strategic Sites within the SPD, rather than in Appendix B to ID11.</p>	<p>At the Regulation 19 consultation stage, the standards for the strategic sites were split between an appendix to the LPDMP (for residential and non-residential car and cycle parking) and the draft Parking SPD (for EVCP provision), which was also consulted on from 21 January to 18 February 2022. Whilst there was an ambition for all parking standards for strategic sites to be contained in DPD, there was an acknowledgement that EVCP standards were likely to be introduced into Building Regulations in 2022. Thus, the inclusion of EVCP standards in the draft SPD was intended to reflect the rapid evolution of Government ambitions and requirements relating to EVCP in the time since the drafting of the Regulation 18 consultation document and the potential for further change over the plan period. As such, it was considered advantageous to set out EVCP standards for</p>

		<p>residential and non-residential development on both strategic and non-strategic sites in an SPD, which would provide greater flexibility for update.</p> <p>After the consultation on the Regulation 19 document had begun, 'Approved Document S: Infrastructure for the charging of electric vehicles' was published by the UK Government and will take effect on 15 June 2022. A proposed minor modification, at point 2) e) of Policy ID11 for strategic sites and at point 3) e) for non-strategic sites, states that "the provision of electric vehicle charging will provide at least the minimum requirements set out in the <a href="#">Parking SPD Building Regulations (Part S)</a>". With this, no numerical parking standards for strategic sites are now included in SPD.</p>
<p>A response to the draft Parking SPD consultation which covers policy matters.</p>	<p>We consider that the [car parking] standards set in the SPD should be treated as minimum standards (as in the Regulation 18 consultation) except in the town centre.</p>	<p>We consider that maximum parking standards are appropriate in the borough's urban areas in order to manage the local road network – with its challenges particularly of congestion, local air quality and severance – and also for optimising the density of development in urban centres and other locations that are well served by public transport. Further, this policy approach also allows for new developments to shape travel demands in ways that are cognisant of national and local net-zero targets.</p>
<p>A response to the draft Parking SPD consultation which covers</p>	<p>We ask for the [car parking] standards for villages and rural areas (Table A2) to be set as 'minimum', rather than 'expected' standards.</p>	<p>With expected standards, there is flexibility for a developer to propose car parking standards which are lower or higher than that 'expected', by providing evidence to back up such a proposal.</p>



policy matters.		
Left blank	<b>Savills on behalf of Taylor Wimpey</b>	Left blank
Left blank	<p>GBC need to review the wording within part 2c) of the policy – which deals with provisions for additional unallocated parking – in order to ensure that it is in line with national objectives and to ensure that it will not have detrimental effects on the masterplan, sustainability credentials and design of strategic sites. Taylor Wimpey suggest part 2c) is deleted. Over the scale of a strategic site, a literal application of 2c. would result in a significant provision of visitor parking, which would be unlikely to be justified to meet needs and wider sustainability objectives. It is not yet certain how Taylor Wimpey are proposing to allocate the residential parking but it is usual for a strategic site to allocate well over 50% of the parking. In the case for Former Wisley Airfield, this would mean, <math>2000 \times 0.2 = 400</math> additional parking spaces to the stock on site. 400 spaces is a minimum of approximately 5,000sqm, plus access space and landscaping. Considering the increased push towards modal shift and encouragement of sustainability, this policy seems to be conflicting. It is concerning that there is such a binary trigger for the extra visitor parking on strategic sites, where their size will generate such a large number of extra spaces. This has potential to pose significant issues to a masterplan, increasing the dominance of cars, where the national objectives are quite the opposite.</p>	<p>The parking requirement for visitors, deliveries and servicing, is intended to complement instances where a majority of allocated parking is provided for residents, set at maximum standards. The residential car parking standards are set at observed levels for the area typologies in the borough and therefore the visitor, delivery and servicing parking requirement allows that a new development is able to meet the parking needs of these users, whilst also potentially accommodating those who have higher than average car ownership. This also aims to incentivise a higher proportion of unallocated parking, which would give increased flexibility.</p> <p>It will be for an applicant, in preparing its masterplan for a strategic site, to decide how it would like to provide parking within the context set by the provisions of the draft policy and the draft Parking SPD. The draft policy provides optionality for the applicant in terms of the quantum of parking that it would like to propose for consideration through a planning application.</p>
Left blank	<b>Savills Planning on behalf of Bloor Homes</b>	Left blank

Left blank	<p>It is noted that GBC is proposing maximum [car] parking standards for strategic and non-strategic sites. Whilst maximum standards might be appropriate in urban settings, the Borough has a broad mix of urban, suburban and rural areas. It is suggested that the use of maximum standards for residential development is removed from the LPDMP.</p>	<p>The draft policy, in combination with the draft Parking SPD, sets out maximum car parking standards for residential development in the town centre, suburban areas and strategic sites but is not proposing maximum car parking standards for rural areas. The standards cater for the broad mix of urban, suburban and rural areas with the inclusion of 'expected standards' for 'Rural &amp; Village' areas as well as the opportunity to provide low car or car-free development in appropriate locations, as set out in the policy.</p>
Left blank	<p>GBC will not be able to alter the public need / habits and desire for private cars on its own; and instead this should be the role for national government, who has more ability to provide incentives and / or restrictions to promote that change. Bloor Homes considers it is more appropriate to provide choice to new residents and the level of parking the market desires. It is considered that the level of parking should be determined by market requirements and controlled by urban design policies and principles. The use of public transport can be promoted independently from parking provision, in order to provide choice to residents.</p>	<p>Parking policy is integral to a sustainable transport strategy and cannot be divorced from wider transport planning and spatial planning considerations. Parking provision must complement other sustainable travel initiatives such as the provision of public transport services.</p> <p>The role of Local Authorities with respect to transport is set out in the Government's Transport Decarbonisation Plan (2021), where it states against Strategic Priority 5: Place-based solutions to emission reduction that, "Local authorities will have the power and ambition to make bold decisions to influence how people travel and take local action to make the best use of space to enable active travel, transform local public transport operations, ensure recharging and refuelling infrastructure meets local needs, consider appropriate parking or congestion management policies, initiate demand responsive travel, as well as promoting and supporting positive behaviour change through communications and education."</p>
Left blank	<p>The LPDMP should include evidence to show where and how maximum [car] parking standards have been used successfully to promote public transport, but to also</p>	<p>Parking policy resides at the heart of an integrated land use and transport strategy and is part of a complex decision-set. It is considered that maximum car parking standards are appropriate in the borough's urban areas in order to manage</p>

	<p>consider the potential implications on the long-term urban design environment of new developments.</p>	<p>the local road network – with its challenges particularly of congestion, local air quality and severance – and also for optimising the density of development in urban centres and other locations that are well served by public transport, including the strategic sites. Further, this policy approach also allows for new developments to shape travel demands in ways that are cognisant of national and local Net Zero targets.</p> <p>The draft Parking Standards Topic Paper, which was available alongside the Regulation 19 consultation, includes evidence drawn from local Census data in Chapter 4, which underpins the setting of maximum residential car parking standards. The methodological approach used, based on calculating average car availabilities for each of the area typologies using Census data, are reflective of relative accessibility of the different area types to key services and facilities by non-car modes.</p> <p>Maximum car parking standards provide the opportunity for an applicant to bring forward low-car or car-free proposals for (or for areas of) a strategic site or non-strategic sites in urban areas. The policy requires that low-car and car-free propositions are to be justified by a coherent package of sustainable transport measures.</p>
<p>SPD response but applicable to policy</p>	<p>Bloor Homes is concerned that the scale of the garages where cycles are proposed to be stored is excessive, and would have ramifications for the layout, achieving high quality design and have implications for the efficient use of land for development. There is also associated build costs with constructing large buildings and this would impact viability, particularly as the larger garages are unlikely to attract higher sale values alone.</p>	<p>There is the opportunity for cycles to be accommodated in a standalone structure, in which case a garage could have the minimum internal dimensions of 6m x 3m - as indicated in Manual for Streets – and count as providing a car parking space.</p>

	<p>Furthermore, it is understood that GBC is committed to adopting the Community Infrastructure Levy (CIL) and so the provision of larger garages required by Standards would also increase CIL liabilities, again impacting viability. The Standards may have the impact of garage not being proposed by developer, which could have a negative impact, by reducing opportunities for cars to be parked out of sight parking and for general ancillary storage.</p>	
Left blank	<p><b>Compton Parish Council</b></p>	Left blank
Left blank	<p>There is no mention within the Policy of underground or multi-storey parking provision. New developments, particularly non-residential developments, should come with a requirement for parking to be underground, or in less visually sensitive areas, multi-storey car parks could be built. Compton PC would also like to see building above some of surface car parking across the borough.</p>	<p>The policy does not preclude underground or multi-storey parking provision or the building above surface car parking in the borough. Further detail is covered in the draft Parking SPD in a section entitled '<i>Underground and multi-storey car parks</i>', paras 5.7 and 5.8.</p>
Left blank	<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. However, the setting of car parking standards must be consistent with national policy, specifically paragraph 108 of the NPPF (2021). We consider maximum car parking standards are appropriate in the borough's urban areas in order to manage the local road network – with its challenges particularly of congestion, local air quality and severance – and also for optimising the density of development in urban centres and other locations that are well served by public transport, including the</p>

		strategic sites. Further, this policy approach also allows for new developments to shape travel demands in ways that are cognisant of national and local Net Zero targets.
Left blank	New homes often convert garages into offices and other residential spaces resulting in cars being parked on pavements and roads. Careful consideration should be given before consenting to change of use where off street parking is likely to cause obstruction.	Planning permission is not usually required for garage conversion however permitted development rights to enable conversion of a garage can be removed when planning permission is granted.
Left blank	<b>Ripley Parish Council</b>	Left blank
Left blank	Irrespective of the size of the development, Ripley Parish Council (RPC) feels very strongly that our own Neighbourhood Plan requirements are more suitable for any new development in our parish, given that we are a semi-rural village with limited public transport links, we anticipate that the car will continue to be the only viable transport option for most residents. Adequate allocated parking provision must be adhered to as set out in the Lovelace Neighbourhood Plan. It is another example of how local knowledge for a particular requirement should supersede an overall blanket policy set by GBC.	As stated in Policy ID11 at point 1) “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, should there be conflict, except in relation to strategic sites.”  The transport sustainability of the strategic sites is of high importance to their success and therefore the ability of the Local Planning Authority to set parking standards for these sites will contribute to this success. As the strategic sites will be masterplanned from the outset, and given their scale, they are required to deliver a range of measures to facilitate the use of sustainable modes of transport. Maximum parking standards set at levels for the urban areas of Guildford borough will complement these measures and allow their potential to be maximised. It is not considered that the proposed policy approach is a blanket approach, as proposed parking standards have been tailored geographically to local circumstance.

Left blank	<p>RPC would also strongly support adequate provision for EV charging points for all new homes, not just at Strategic Sites. Every development should be required to provide charging points, regardless of the size and number of units. Residents at smaller new developments should not be disenfranchised by the lack of suitable EV charging. This is not joined up thinking and is akin to saying that only residents living in huge new development villages will want to drive an electric car.</p>	<p>The EVCP standards as set out in Appendix C, Table C1 in the draft Parking SPD were to apply to both strategic and non-strategic sites. After the consultation on the Regulation 19 document had begun, 'Approved Document S: Infrastructure for the charging of electric vehicles' was published by the UK Government and will take effect on 15 June 2022. A proposed minor modification, at point 2) e) of Policy ID11 for strategic sites and at point 3) e) for non-strategic sites, states that "the provision of electric vehicle charging will provide at least the minimum requirements set out in the <a href="#">Parking SPD Building Regulations (Part S)</a>".</p>
Left blank	<b>Councillor Seabrook</b>	Left blank
<p>A response to the draft Parking SPD consultation which covers policy matters.</p>	<p>Greater emphasis needs to be given to long term cycle parking.</p> <p>Perhaps an additional category of 'long-stay public cycle parking' is needed to distinguish it from the existing definition for 'private' parking.</p>	<p>The numerical standards set out for long-term cycle parking follow that provided in DfT's Local Transport Note 1/20 guidance. Further design guidance in the draft Parking SPD aims to ensure cycle parking is attractive and secure, and notes that best practice guidance can be found in 'Standards for Public Cycle Parking' (The Bicycle Association, 2021).</p>
<p>A response to the draft Parking SPD consultation which covers</p>	<p>'Secure and lockable' should be mandated, rather than preferable.</p>	<p>The draft Parking SPD provides guidance, which will supplement Policy ID11: Parking Standards for New Development. Within the reasoned justification of the policy, specifically at para 6.129, it is specified that long term parking must be "more weatherproof and have greater security provided through an enclosed and lockable shelter, store or compound."</p>

policy matters.		
A response to the draft Parking SPD consultation which covers policy matters.	The number of car spaces allowed is so much greater than the minimum required long-stay cycle spaces. That does not encourage modal shift. For example, only one cycle space is required for 200 sqm of office space but a max of 6 car spaces is allowed.	The parking standards can be further updated to reflect trends in travel in future or new ambitions in this regard. Whilst promoting sustainable travel it is important to be mindful of the proportion of the population who use the car compared to the proportion who cycle.
A response to the draft Parking SPD consultation which covers policy matters.	It is accepted that residents of nursing homes are unlikely to ride bikes, but what about staff? 0.05 spaces per bedroom means only 1 space per 20 staff.	The numerical standards set out for long-term cycle parking follow that provided in DfT's Local Transport Note 1/20 guidance for 'Sheltered/ elderly housing or nursing homes'. These are minimum requirements and do not limit the level of cycle parking to be provided. There is also a short stay requirement for 0.05 spaces per residential unit which could be improved upon in development propositions.

**Other respondents**

Paragraph	Main Issue Summary	GBC Response
Left blank	<p>Change maximum [car parking] standards to 'minimum', or possibly 'expected'. While the aim of achieving modal shift is fully justified, the conditions for reducing car use in the medium term cannot be assured. In the interests of avoiding excessive on-street parking as a consequence of under-provision of spaces, the standards should be minima except in the town centre.</p>	<p>Parking policy resides at the heart of an integrated land use and transport strategy. A strategic approach has been proposed, with an exception to give primacy to the parking standards set in Neighbourhood Plans, except in relation to strategic sites.</p> <p>This strategic policy approach involves the application of maximum residential car parking standards in the borough's urban areas and strategic sites, expected residential standards in the borough's village and rural areas, and maximum non-residential standards across the borough. We consider that maximum parking standards are appropriate in the borough's urban areas in order to manage the local road network – with its challenges particularly of congestion, local air quality and severance – and also for optimising the density of development in urban centres and other locations that are well served by public transport. Further, this policy approach also allows for new developments to shape travel demands in ways that are cognisant of national and local Net Zero targets.</p> <p>The methodological approach used to calculate the proposed residential car parking standards, based on calculating average car availabilities for each of the area typologies using Census data, are reflective of relative accessibility of the different area types to key services and facilities by non-car modes.</p> <p>Policy ID11 5) d) states that “development proposals will be required to demonstrate that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users.”</p>



Left blank	Disagree with maximum [car parking] standards with no minimum for residential development.	<p>We consider that maximum car parking standards are necessary in urban areas in Guildford borough to manage the local road network. Congestion and various externalities affect the urban areas. In addition to congestion, there is an opportunity to make most efficient use of land in the urban areas, with specific opportunities in Guildford town centre which is well served by public transport.</p>
Left blank	Disagree with visitor parking requirement, it is complex and the rate of parking (0.2) is wrong.	<p>The visitors, deliveries and servicing parking requirement, which applies only in instances where the majority of residential car parking spaces are allocated, is intended to complement parking provision for residents. The parking standards for residents are, as maximum standards, more stringent than neighbouring authorities, who typically have set minimum residential car parking standards. The visitors, deliveries and servicing parking requirement is integral to the car parking standards in the policy. The residential car parking standards are set at observed levels for each of the area typologies and therefore the visitors, deliveries and servicing parking requirement allows that a new development is able to meet the parking needs of these users, whilst also potentially accommodating those who have higher than average car ownership, in instances where the majority of parking spaces are allocated and therefore less flexible in terms of who can use them. This also aims to incentivise a higher proportion of unallocated parking.</p> <p>The draft policy provides optionality for the applicant in terms of the quantum of parking that it would like to propose for consideration through a planning application.</p>

Left blank	Disagree with maximum [car parking] standards for non-residential development – this should be a minimum.	<p>The non-residential car parking standards are based on those recommended by Surrey County Council as the Local Highway Authority. As stated in the reasoned justification at para 6.124 “Restricting car parking at the destination has been proven to influence mode choice. A study of commuters working in Cambridge investigated statistical associations between mode choice and personal and environmental characteristics (Dalton et al, 2013). Car availability was found to be a strong predictor of mode of travel to work and the absence of free car parking at work was associated with a markedly higher likelihood of walking, cycling, and public transport use.”</p>
Left blank	No minimum residential parking requirement means in reality the supply of a charging point but no parking place.	<p>After the consultation on the Regulation 19 document had begun, ‘Approved Document S: Infrastructure for the charging of electric vehicles’ was published by the UK Government and will take effect on 15 June 2022. A proposed minor modification, at point 2) e) for strategic sites and at point 3) e) for non-strategic sites, states that “the provision of electric vehicle charging will provide at least the minimum requirements set out in the <a href="#">Parking SPD Building Regulations (Part S)</a>”. The Approved Document states, at 1.1, “Where no associated parking spaces are provided, there is no requirement to install an electric vehicle charge point.”</p> <p>Given this minor modification to the policy, Table C1 of Appendix C in the draft Parking SPD ‘EVCP Standards for Strategic and Non-Strategic Sites’ has been removed, but the reference that car-free development would be exempt from the provision of EVCP, excluding that the requirements will apply to any car parking spaces provided such as for drop off, deliveries, servicing and visitors, will be retained in the SPD.</p>

Left blank	<p>Maximum [car parking] standards for non-strategic residential development contradicts inclusion of Neighbourhood Plan requirements thus undemocratic imposition of maximums on non-Neighbourhood Plan areas.</p>	<p>The LPDMP, in combination with the draft Parking SPD, will set parking standards for non-Neighbourhood Plan areas and in instances where the Neighbourhood Plan is silent. These standards are proposed as maximum standards for residential development in town centre and suburban locations but are set as expected standards in rural and village locations. It is intended that the LPDMP and the Parking SPD will, in due course, be adopted by GBC, a democratic body which can bring forward DPDs and SPDs in accordance with its constitution.</p>
Left blank	<p>Expected standards for village and rural areas can be used to usurp Neighbourhood Plans.</p>	<p>As stated in draft Policy ID11, 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, should there be conflict, except in relation to strategic sites.</p>
Left blank	<p>The impressions and arguments are an agenda which simply does not fit into the lives of the existing residents of Guildford LPA as displayed by the multitude of Neighbourhood Plans which require minimum parking spaces and availability of visitor and delivery parking.</p>	<p>The setting of car parking standards must be consistent with national policy, specifically paragraph 108 of the NPPF (2021). We consider maximum car parking standards are appropriate in the borough's urban areas in order to manage the local road network – with its challenges particularly of congestion, local air quality and severance – and also for optimising the density of development in urban centres and other locations that are well served by public transport, including the strategic sites. Further, this policy approach also allows for new developments to shape travel demands in ways that are cognisant of national and local Net Zero targets.</p> <p>Whilst Neighbourhood Plans and their parking standards are supported through the Policy, a strategic approach to transport is required to provide an appropriate number of</p>

		<p>car parking spaces, based around the average car availability levels observed across different property sizes and types as well as area typologies. Further, the residential car parking standards include a visitor parking element, also catering for servicing and delivery vehicles, at a rate of 0.2 spaces per dwelling applied only in circumstances where 50% or more of the total number of spaces, provided by use by residents themselves, are allocated. This is set out in Policy ID11 at 2) b) and 3) c).</p>
<p>Left blank</p>	<p>Disagree with the requirements for low car development because “sustainable transport is neither identified in scheduling or in routes or costing per mile” and it is “currently inadequate with no sign of improvement”, the walking/cycling access criteria is not relevant and is part of an anti-car agenda and the use of planning obligations to restrict residents parking permits is contrary to Court of Appeal case of R (Khodari) v Royal Borough of Kensington and Chelsea Council [2017] EWCA Civ 333 (Khodari).</p>	<p>The sustainable transport proposals contained in Surrey County Council’s draft Local Transport Plan 4, alongside the Government’s Transport Decarbonisation Plan and related initiatives such as Bus Service Improvement Plans and Local Walking and Cycling Infrastructure Plans aim to deliver the level of ambition required to meet net-zero targets. Parking policy is integral to a sustainable transport strategy and cannot be divorced from wider transport planning and spatial planning considerations.</p> <p>In reference to restricting the ability of residents of car-free or low-car development to apply for parking permits, GBC and SCC use an approach whereby a Section 106 obligation is obtained to pay towards the cost of amending the Traffic Regulation Order for the Guildford Controlled Parking Zone to exclude the development in question from being eligible for residents’ on-street parking permits. This differs from the approach which was subject to the Court of Appeal ruling. However, a minor modification has been proposed to Policy ID11 at point 4) b) iv) “that the car-free status of the development can be <del>enforced</del> <u>assured</u> by planning obligations and/or on-street parking controls;” to clarify that the facilitation of car-free development can be achieved by means of planning obligation and/or on-street</p>

		parking controls, rather than any definite need for the use of planning enforcement processes.
Left blank	Disagree with 'car-free developments' as a concept except in the town centre as it excludes "50% of residents" who don't have excellent quality of walking and cycling access to a district centre or Guildford town centre, a lack of high public transport accessibility, the car club concept is flawed as it does not provide for regular journey to work, incentivisation of measures is never in perpetuity and monitoring may not result in appropriate remedy if proposals fail.	Requirements for car-free development are explicit and it is anticipated that a minority of developments in the borough in future could be car free. The planning decision maker will consider the evidence provided by the applicant in terms of whether high public transport accessibility is provided for users of a development and Surrey County Council, as the Local Transport Authority, would normally be expected to opine on this matter. Car clubs are a well-established concept in national and local policy, including the Government's Transport Decarbonisation Plan and Surrey County Council's Local Transport Plan 4. CoMoUK (the national advocacy group for shared transport) state that car clubs offer individuals and businesses occasional access to a personal vehicle without being tied to ownership. Car free developments may include a limited element of parking for those who are mobility impaired and require their own private vehicle. Incentivisation of measures is to establish habitual patterns of sustainable travel behaviours. The planning decision taker may take advice from Surrey County Council, as the Local Transport Authority, on the appropriate 'monitor and manage' arrangements for a particular development proposal. In addition, individuals considering whether to buy or rent in such future developments will have free choice, bearing in mind their own circumstances.
Left blank	The document relies on unreliable statistics many years out of date which have been manipulated to match the argument. Using documents superseded by change of	Vehicle licencing statistics were analysed to understand the change in car availability in Guildford borough between 2011, the year of the 2011 Census, and 2019 (the most recent DfT data set available at the time of analysis). With a difference between the two rates of 0.13%, the increase in

	<p>government direction or not available to the general public.</p>	<p>licenced vehicles approximately tracks the increase in the housing stock and as such, average car availability rates per household within the borough have not changed substantially over this time. As such, the data from the 2011 Census was considered to be an appropriate data set to analyse to represent 2019 conditions and did not need to be growthed.</p> <p>It is considered that Policy ID11 aligns with current Government direction as set out in the NPPF, paragraphs 107 and 108 namely.</p> <p>Documents listed in the 'Key Evidence' section of the Policy are all available to the public, either online or via a request to Surrey County Council, the Local Highway Authority.</p>
Left blank	<p>The concept of half of a car space is bizarre and would mean parking outside the curtilage of the property for both visitors and the second or third car on adjacent road side parking, with no real provision for visitors or delivery vehicles.</p>	<p>The practical application of residential car parking requirements was detailed in the Reasoned Justification at paragraph 6.121, but this referred only to instances with unallocated parking. A minor modification is proposed at paragraph 6.121 to read "<del>For example, the delivery of 5 two-bedroom houses in a suburban location, with a maximum car parking provision of 1.5 spaces each (a total of 7.5 spaces throughout the development), would be rounded down to 7. In the example of a development of a single property, the same rounding method would apply. Several worked examples are given in the Parking for New Development SPD. These include identifying the potential need for additional spaces for visitors, servicing and deliveries.</del>" Provision for visitors, servicing and delivery vehicles is set out in Policy ID11 at 2) b) and 3) c).</p>
Left blank	<p>The policy does not take account of:</p>	<p>Policy ID11 provides that new developments are able to provide for a level of residential car parking which matches current car availability, as they are set at, or rounded up</p>

	<ul style="list-style-type: none"> <li>• The 50% of the population which do not fit the following “A fit able person and a public transport system which by implication is integrated at a cost which is affordable for a family of 4.”</li> <li>• Inability to utilise ‘active travel’ through age or infirmity</li> <li>• Inability to carry 20kg+ for 15 minutes continuously; the 15-minute community proposal</li> <li>• Those outside the 50 metres to a bus stop; the blue badge criteria.</li> <li>• The lack of ‘planned’ public transport</li> </ul>	<p>from (to the nearest .5), the average car availability levels observed for the different area typologies. This, in turn, is reflective of differences in accessibility to key services and facilities for the area types and established travel habits. The standards combine a spatially-differentiated approach to the provision of vehicle parking for new residential developments with the focus of restraint increasing closer to Guildford town centre where opportunities for active and sustainable travel increase. The policy also supports the expansion of car club vehicles within the vicinity of potential car-free developments, providing choice to those who may not own a car, or have limited public transport options/ active travel opportunities to reach their destination.</p>
<p>A response to the draft Parking SPD consultation which covers policy matters.</p>	<p>Impractical objective to hope individuals will abandon their cars in favour of bicycles and/public transport therefore the level of residential car parking provision too low.</p>	<p>The car parking standards contained within the draft Parking SPD (referenced from Policy ID11 in the LPDMP) are based on observed average car availability for the different area typologies.</p>
<p>A response to the draft Parking SPD consultation which covers policy matters.</p>	<p>Reference to research statistics from 2006 and 2010 is a flaw. Research should look at future needs, not the past.</p>	<p>The standards look to future needs with the potential for low car and car-free development and car parking standards in areas well served by alternative modes of transport, amongst other aspects as set out in the Policy.</p> <p>Vehicle licencing statistics were analysed to understand the change in car availability in Guildford borough between 2011, the year of the 2011 Census, and 2019 (the most recent DfT data set available at the time of analysis). This rate was then compared with the change in housing stock</p>

		<p>within Guildford borough during this same period. GBC's Annual Monitoring Report (2020) shows an increase of 4.35% in housing stock between financial years 2010/2011 and 2019/2020. With a difference between the two rates of 0.13%, the increase in licenced vehicles approximately tracks the increase in the housing stock and as such, average car availability rates per property within the borough have not changed substantially over this time. As such, the data from the 2011 Census was considered to be an appropriate data set to analyse to represent 2019 conditions and did not need to be growthed.</p>
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## Appendices C and D

### Prescribed bodies

None

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Guildford Greenbelt Group</b>	Left blank
Appendix C	P11 Air Quality and Air Quality Management Ares should be upgraded to a strategic policy as it is so critical to the health and well-being of our residents. We are also facing extremely high levels in Guildford of air pollution, with the A3 being identified as one of the worst polluted roads in the UK.	The NPPF states non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. The Council considers that P11 meets this definition.

## Question 6 – Any other comments

*Do you have any other comments that have not been covered by the previous questions?*

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Defence Infrastructure Organisation obo Secretary of State for Defence</b>	Left blank
Left blank	<p>In line with the need to ensure matters of National Security are considered and the National Planning Policy Framework (NPPF) it is important that planning authorities and development plans recognise that MOD Establishments are of strategic military importance to the UK. As such operational development on MOD establishments should be supported. In turn, due to the need to maintain operational capabilities, development in proximity of MOD Establishments should be required to demonstrate that they align with the ‘agent of change’ principle found in paragraph 187 of the NPPFii. As such their development won’t lead to the need for mitigation from MOD activities. It is therefore suggested that emerging development plans include a specific policy to address those needs. Such a policy also needs to recognise the brownfield nature of MOD sites and the MOD’s commitments to bring forward proposals to reduce its built estate, as part of those proposals sites could be declared as surplus Such policies have been adopted in development plans across the UK.</p>	<p>The LPSS inset a number of MOD establishments from the Green Belt. This removed the need for development proposals to demonstrate ‘very special circumstances’ which helps to support appropriate development on these sites. The emerging LPDMP includes policy in relation to the agent of change which, when combined with NPPF policy, will prevent inappropriate development which impacts on the ability of the MOD to maintain operational capabilities.</p> <p>The appropriate level of contributions sought from MOD development proposals is outside the scope of the LPDMP.</p>

	<p>For MOD operational developments the associated community facilities needed are identified through nationally set guidance known as Joint Service Publications (JSPs). In summary, these seek to identify that the daily needs of service personnel are met within MOD establishments. It would not therefore be appropriate for CIL / Developer contributions policies not to take account of that level of existing provision and “double count” contributions needed. There are specific elements also related to service accommodation as outlined below.</p>	
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### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Thames Water</b>	Left blank
Left blank	<p>The LPDMP should contain the following proposed Water Supply and Wastewater/Sewerage Infrastructure Policy:</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</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 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 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>Such an approach was set out in the previous consultation, and we supported Part 2 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>Hence, a further text should be added to Policy as follows: “The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”</p>	<p>It is not considered that further generalised, supportive policy text is necessary in relation to the development or expansion of water supply or wastewater facilities. The LPSS allocates land for infrastructure including for a new sewage treatment works (also allocated in the Surrey Waste Local Plan), alongside setting out the key infrastructure on which the delivery of the Plan depends, which includes providing for upgrades to water supply and wastewater infrastructure. In the case of any further land that may be necessary for the development or expansion of water supply or wastewater facilities not allocated nor provided for in the Development Plan, the NPPF para 11 provides direction and the proposed text (which also reflects a form of presumption) would add nothing further.</p>
Left blank	<b>Guildford Greenbelt Group</b>	Left blank

Left blank	<p>Guildford Greenbelt Group are concerned that Regulation 18 Policy H4 Density has been removed, with some of the content placed in D4/D9. As these are, to a degree, non-strategic polices, density is something that we could afford to be more specific about, considering it is such an issue across our Borough, and is consistently referred to at Planning Committee. This is most notable with regard to allocated sites decisions, infilling and windfall. The residential Design Guide, dated 2004, is in dire need of review. The Borough lacks a Character Study, and very few Conservation Area Character Appraisals are in place, some awaiting adoption from three years ago. There is a smattering of adopted Neighbourhood Plans. So there is very little in the way of design coding that addresses the Government agenda of Building Beautiful and National Design Guidance.</p> <p>GGG believe there should be tighter controls on density, which also impacts height – a key issue for our Town Centre and our Villages. Sites approved already are destroying the character of our Borough and as this is not placed high enough in the planning balance.</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...</p> <p>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>
Left blank	<b>Gatwick Airport Ltd</b>	Left blank
Left blank	<p>Aerodrome Safeguarding is a legislative requirement for officially safeguarded aerodromes of which Gatwick Airport is one. Aerodrome safeguarding is the process used to ensure the safety of aircraft while taking off and landing or flying in the vicinity of aerodromes.</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>It is vital that the safe operation of the airport is not impacted upon by buildings, structures or works. The Guildford Borough area currently sits within our 30km wind turbine safeguarding area and we note with thanks that mention is made under para 5.261 of the above mentioned document with regard to this.</p> <p>Currently Guildford Borough sits outside of our safeguarding zone for development which is 15km. However later this year (date to be confirmed) the Gatwick Safeguarding zone relating to Instrument Flight Procedures (IFPs) is being extended and will include the Guildford Borough area. The exact trigger heights are still to be determined but it is likely that any buildings/structure over 90m (to be confirmed) will need to be referred to us for consultation.</p> <p>Given the above we would ask that the following policy be added to the Development Management Policies Document:</p> <p><b>Aerodrome Safeguarding Policy</b>  Development will only be supported if it is consistent with the continued safe Operation of Gatwick Airport.</p> <p>Where required, the Local Planning Authority will consult with the airport operator and/or the operator of technical sites (eg radar stations) on relevant proposals in the aerodrome safeguarded areas. Statutory consultation responses may require that restrictions are placed on the height of the proposed buildings/structures to avoid impact on the</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>
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	<p>aerodrome, in relation to Instrument Flight Procedures (IFPs) and/or navigational aids.</p> <p>Proposals that cannot be mitigated to the satisfaction of the statutory consultees are considered to be a hazard to aircraft safety and will be refused.</p> <p><b>Reasoned Justification:</b> 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 &amp; Country Planning process by way of ODPM/DfT Circular 01/2003 'Safeguarding of Aerodromes &amp; Military Explosives Storage Areas' Direction 2002.</p> <p>This policy will ensure that the requirements of aerodrome safeguarding are taken into account in the planning and design of development.</p> <p>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> <p>Once the new consultation maps are available and confirmation of the consultation trigger heights has been confirmed we will be in contact with you.</p>	
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	Welcome deletion of Policy H4, which was vague and provided little guidance on appropriate density. We	The desired outcome is high quality design and amenity space that is useable and fit for purpose – it is considered more effective that the plan contains a policy that includes the

	<p>recommend the Council adopt a policy similar to the Burpham Neighbourhood Plan policy B-EN1 in which density is guided by plot size, specifically percentages of open private space to building size, ensuring each home has suitable amenity space. This is preferable to an arbitrary density.</p>	<p>qualitative considerations and requirements that are imperative in achieving this (see draft Policy D5). 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. However, it is acknowledged that further guidance and standards may be forthcoming, particularly at a local or neighbourhood scale. In this regard, the policy notes that development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential separation distances.</p>
Left blank	<p><b>Savills Planning on behalf of St Edward Homes Ltd</b></p>	Left blank
Left blank	<p>Guildford Borough Council (GBC) need to consider the objectives of the LPDMP and crucially if it contributes to effective and efficient decision making. At present, the document repeats a lot of national guidance and policies in the adopted Local Plan: Strategy and Sites (2019) (LPSS) which could lead to contradictions between documents and complications to the decision making process.</p>	<p>It is considered that the policies in the emerging LPDMP provide additional guidance and detail to the strategic policies in the LPSS. It is consistent with national policies however provides valuable local context for the decision maker.</p>
Left blank	<p><b>Savills Planning on behalf of Bloor Homes</b></p>	Left blank
Left blank	<p>Guildford Borough Council (GBC) need to consider the objectives of this Plan and whether the policies it contain support an effective and efficient decision making process. At present, the document repeats national guidance and policies in the adopted LPSS (2019). It should be as concise as possible, as specified in the PPG (002). Development in the Borough must be guided by these documents anyway,</p>	<p>It is considered that the policies in the emerging LPDMP provide additional guidance and detail to the strategic policies in the LPSS. It is consistent with national policies however provides valuable local context for the decision maker.</p>



	thus repeating the policies serves only to complicate decision making.	
Left blank	<b>Merrow Residents' Association</b>	Left blank
Left blank	<p>Guildford needs a clear policy that covers both the height of buildings and the density of housing and that the starting point should be that no building should have more than 6 storeys in the town centre and this should be reduced to 3 storeys in areas outside the town centre.</p>	<p>Draft Policy D4 states that 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. Setting of height limits is not considered appropriate as it will vary depending on a site's location and context. 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.</p>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	<p>Object to the deletion of H4. To meet the requirements of providing more housing and using "densification" as one means of doing this, (imposed on us by Central Government), and the need to minimise the use of energy and materials and yet to protect the Green Belt, the previous well-established policy of requiring new development to be at a density of 30 – 50dph, except in the designated town centre, should be retained.</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>

Left blank	<b>Savills on behalf of Taylor Wimpey</b>	Left blank
Left blank	The document repeats a lot of National policy and polices in the adopted Local Plan Strategy & Sites (2019) (LPSS). 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 and in some cases works to reduce the visibility and understanding of the specific policies in this plan.	It is considered that the policies in the emerging LPDMP provide additional guidance and detail to the strategic policies in the LPSS. It is consistent with national policies however provides valuable local context for the decision maker.
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	Oppose the deletion of H4: Housing Density	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.
Left blank	Oppose the deletion of Policy E10: Rural Character (including Farm Diversification)	Policy E10 was removed from the document, as it was considered that its provisions are adequately addressed in the NPPF (in particular paragraphs 149-150 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.

Left blank	<p>The crucial contribution of biodiversity to landscape beauty, character and distinctiveness is given insufficient attention in the Protecting chapter.</p> <p>This has consequences for a borough which includes considerable swathes of countryside designated by parliament for its great natural beauty as AONB. It is also a concerning omission in relation to the scenic contribution of biodiversity and green features to the valued character and distinctiveness of Guildford. Valued, distinctive traits of Guildford include mature trees and other vegetation within and between plots, soft green edges that provide screening to settlements in views, and green corridors along routes (road and river) into settlements. This is flagged in part one of the plan and needs to be followed through in this DMP part of the plan.</p> <p>This chapter should set out an overarching ambition for policies to sustain the green character of Guildford from the perspective of natural beauty by promoting:</p> <ol style="list-style-type: none"> <li>1. Space for mature planting within plots</li> <li>2. Effective screening to achieve soft green edges to settlements and new developments</li> </ol>	<p>The Protecting Chapter includes policies that seek to protect biodiversity and deliver the best biodiversity outcomes and biodiversity net gain. The Design chapter seeks to deliver high quality design and responds to its context. Draft Policy D4 requires that development proposals respond positively history of a place, significant views (to and from), surrounding context, built and natural features of interest, prevailing character, landscape and topography. Development proposals are expected to demonstrate high quality design at the earliest stages of the design process, and then through the evolution of the scheme, including in relation to plot sizes and landscaping.</p>
Left blank	<b>Guildford Society</b>	Left blank
Left blank	<p>Oppose deletion of Policy H4 as by not having clarity on density and height the Council will face major difficulties in managing proposed developments in the future.</p>	<p>Draft Policy D4 states that 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. Setting of height limits is not</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. Other Towns have Area SPD's or Height SPD's to manage density and height effectively.</p>	<p>considered appropriate as it will vary depending on a site's location and context. 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.</p>
Left blank	<p><b>Send Parish Council</b></p>	Left blank
Left blank	<p>Believe that more prescriptive guidance on suitable min-max density for sites in village locations would help to avoid densities that are more suited to urban environments from being applied to village locations.</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>
Left blank	<p><b>Compton Parish Council</b></p>	Left blank
Left blank	<p>Oppose the deletion of H4: Housing Density</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</p>

		includes consideration of certain factors. Rather than density being the driving force behind a scheme, it is good design that is at the forefront.
Left blank	Oppose the deletion of Policy E10: Rural Character (including Farm Diversification)	Policy E10 was removed from the document, as it was considered that its provisions are adequately addressed in the NPPF (in particular paragraphs 149-150 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.
Left blank	Oppose the deletion of Policy ID7: Sport, Recreation and Leisure Facilities	Policy ID7 was removed from the document as its provisions were considered duplicated in the NPPF and other emerging LPDMP policies.

### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	<p>GBC should be more ambitious in going above and beyond the requirements of the NPPF in setting local policies that protect the environment, mitigate the effects of Climate Change, minimise Co2 emissions and prevent place-breaking (for example through infilling).</p> <p>National policy concerning the Biodiversity Crisis and Climate Change Emergency is lagging behind (until implemented in law) but these aspects are developing rapidly and all policies in the Local Plan should allow for higher standards emerging in the future (rather than</p>	These issues are covered by the main issue tables for P6/P7 (for biodiversity) and D14 (for climate change).

	preventing those higher standards from being imposed). In other words all these policies must be future-proof.	
Left blank	Need a policy on limiting height and mass of development in sensitive areas including Guildford town centre	Draft Policy D4 requires new development to respond to the surrounding context and prevailing character, and references height and massing. Setting of height limits is not considered appropriate as it will vary depending on a site's location and context. The Guildford Town Centre Views SPD adds provides further protection against inappropriate height if it harms one of the identified key views.
Left blank	The monitoring measure stated for most of the policies is unquantified and is based on the number of times a Planning Inspector overturns a GBC decision. There is therefore a perverse incentive (to avoid looking bad on this measure) to grant contentious applications and avoid appeals.	Monitoring indicators assess the effectiveness of the LPDMP policy. Ultimately the policy will be tested through the appeal process when an inspector will consider how much weight should be given to it in determining the appeal. It is for this reason that its success at appeal, in being used as a reason for refusal in dismissing appeals, is used as the monitoring indicator for the vast majority of the policies.

**Appendix 7 – LPDMP Regulation 18 Consultation  
Statement (2022)**

DRAFT

# Guildford borough Local Plan: development management policies Issues, Options and Preferred Options

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## Consultation and Duty to Cooperate Statement

January 2022

*This document has been updated since first publication in January 2022 as part of the Proposed Submission Local Plan: development management policies Regulation 19 consultation, in order to comply with The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018.*





## **Alternative formats**

If you would like to read this consultation document in a different format such as large print or a different language, please contact Planning Policy:

Telephone: 01483 444 471

Email: [Planningpolicy@guildford.gov.uk](mailto:Planningpolicy@guildford.gov.uk)

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## Appendices

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Appendix 2:	Guildford borough Local Plan: development management policies Issues, Options and Preferred Options consultation (2020) Consultation Response Form
Appendix 3:	Guildford Borough Council press release dated 3 June 2020
Appendix 4:	Main Issues (Regulation 18 consultation)

All documents relating to the Local Plan: development management policies consultation can be found along with other supporting information on the Guildford Borough Council website at: <https://www.guildford.gov.uk/article/25707/Part-2-of-our-Local-Plan>

## Figures

Figure One:	Twitter and Facebook post examples
Figure Two:	Options for providing feedback
Figure Three:	Chart showing number of comments per LPDMP Issues and Options questions

# 1. Overview

## **Guildford borough Local Plan: development management policies Issues, Options and Preferred Options Consultation Statement (Regulation 18)**

- 1.1 This Consultation and Duty to Cooperate Statement describes how Guildford Borough Council has undertaken community participation and stakeholder involvement in the production of the Local Plan; development management policies (LPDMP), in accordance with Regulation 18. This document responds to and fulfils the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and specifically Regulation 22(1) part (c).
- 1.2 Regulation 22(1) part (c) requires the submission to the Secretary of State of a statement setting out:
  - (i) which bodies and persons the local planning authority invited to make representations under Regulation 18
  - (ii) how those bodies and persons were invited to make representations under Regulation 18
  - (iii) a summary of the main issues raised by the representations made pursuant to Regulation 18
  - (iv) how any representations made pursuant to Regulation 18 have been taken into account
- 1.3 It also seeks to demonstrate that the Council has met the Council's legal 'Duty to Cooperate' as set out by the Planning and Compulsory Purchase Act 2004 (as amended) and by the National Planning Policy Framework. This places a legal duty on local planning authorities and county councils in England and public bodies to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

## 2. Introduction

- 2.1 This Consultation and Duty to Cooperate Statement sets out how Guildford Borough Council (the Council) undertook consultation on the Guildford borough Local Plan: development management policies Issues, Options and Preferred Options during 2020 in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It summarises who was invited to make representations, how we consulted, the comments that were received and how we took these into account.
- 2.2 It also sets out the reasons why the Council, upon reconsideration of the Regulation 19 LPDMP, does not consider the policies raise any cross boundary strategic matters, as defined by the Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended). This means that the legal Duty to Cooperate is not engaged as part of this plan's preparation but in any event sets out the steps that were taken to liaise with bodies who might have been subject to such a duty.
- 2.3 Consultation on the Guildford borough Local Plan: development management policies Issues, Options and Preferred Options document took place between Wednesday 3 June and Wednesday 22 July 2020 over a seven-week period.
- 2.4 The seven-week consultation period gave the community opportunities to provide input and comment on the issues, options and preferred options of the emerging version of the Local Plan: development management policies. This exceeds the six-week length of consultation stipulated in the Regulations for Regulation 18. See Appendix 1 for a list of the Local Plan consultees.
- 2.5 In total, approximately 1313 comments were received and approximately 97 people/organisations made representations at this stage.
- 2.6 This statement sets out what consultation has been undertaken in accordance with Regulation 18 during 2020, when, and with whom. This document fulfils the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and specifically Regulation 22(1) part (c) which states that a Consultation Statement has to be produced to set out:
  - which bodies and persons the Council invited to make representations under Regulation 18
  - how those bodies and persons were invited to make representations under Regulation 18
  - a summary of the main issues raised by the representations made pursuant to Regulation 18
  - how any representations made pursuant to Regulation 18 have been taken into account
- 2.7 This Regulation 18 Consultation and Duty to Cooperate Statement will assist the Inspector at the Examination in determining whether the borough's Local Plan has been prepared in accordance with legal and procedural requirements.

2.8 The document shows that the consultation carried out by the borough has complied with the statutory requirements set out in the Localism Act 2011, Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulation 18) and the Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020. It also shows that public involvement was carried out following the approach set out in the Council's Statement of Community Involvement (SCI). This is contained in our 'Statement of Community Involvement' document (2020) which can be found on the Council's website here: <https://www.guildford.gov.uk/sci>

### 3. Consultation on Guildford borough LPDMP Issues, Options and Preferred Options (2020)

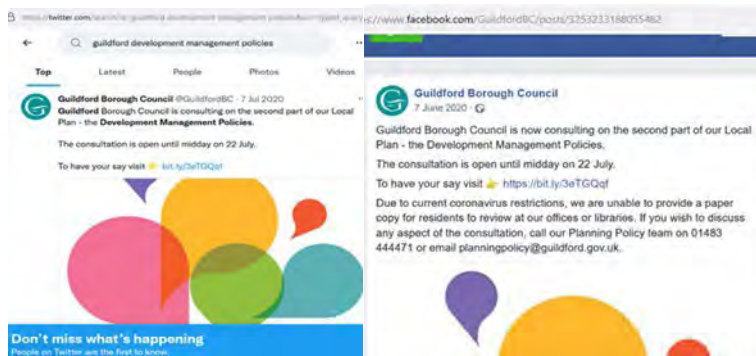
#### Regulation 18 consultation

- 3.1 This section of the Consultation and Duty to Cooperate Statement sets out how the Council undertook a consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 during 2020. Consultation on the Guildford borough Local Plan: development management policies Issues, Options and Preferred Options (2020) took place between Wednesday 3 June and Wednesday 22 July 2020 (a seven-week period).
- 3.2 The seven-week period meets the statutory requirements of the Regulations. It gave the community the opportunity to review and comment on the Guildford borough Local Plan: development management policies Issues, Options and Preferred Options (2020).

#### Promotion of the consultation period

- 3.3 The Local Plan: development management policies Issues, Options and Preferred Options (2020) consultation period was promoted through a range of means including emails, local media, social media and a variety of other methods:
- Press release highlighting and promoting the consultation on 3 June 2020 (see Appendix 3)
  - Repeat social media posts during consultation
  - Specific web page dedicated to the Local Plan, as part of the Council's website and links from the front page of the main Council website
  - Emails to approximately 2775 people from the database of Local Plan stakeholders
  - Letters to approximately 51 people were generated on 26 May 2020
  - Internal Council communications to officers and elected members
- 3.4 The press release was issued to local media on 3 June 2020 and remained on the News and Event page of the website thereafter. The press release explained how to leave feedback on the Plan and the deadline for doing so.
- 3.5 The Local Plan web page, which sits within the Council's main website, was utilised to make information on the consultation more accessible. The consultation homepage was available to view at <https://guildford.inconsult.uk/consult.ti/LPDMIO/consultationHome>. The consultation homepage included an explanation of the Local Plan and a link to a copy of the Local Plan: development management policies Issues, Options and Preferred Options (2020). All associated documents were available to download and 'how to comment' was explained.

**Figure 1: Twitter and Facebook post examples**



## Consultation methods

- 3.6 In-person consultation events did not take place with Covid related restrictions in place. The Covid-19 restrictions also meant that paper copies of the documents were not available to view at the Council office main reception at Millmead or in the Guildford borough libraries as they were closed to members of the public.
- 3.7 In view of the Covid-19 restrictions and the Council's obligations in terms of the Public Sector Equality Duty, we took extra steps to enhance the consultation to help consultees access the relevant information. These further activities were set out in the Council meeting order paper (5 May 2020) preceding the consultation and included:
- List Notification of the consultation in the local press, along with relevant Council contact information;
  - Posting letter notifications to those consultees on our consultation database that do not have an email address and incorporating additional consultation material which provided a hard copy summary of the policies adapted to allow it to be used as a template for an easy written response that can be submitted as part of the consultation process.
  - Posting letter notifications (and additional consultation material, as above) as well as sending email notifications to all parish councils with a request to make this available to local people, where it is within their means to do so taking into account current circumstances.
  - Including in all notifications, as well as the planned press release, contact information for the Council should consultees have difficulties accessing the online documents and wish to discuss the contents of the consultation document. [As part of any discussion with consultees, officers were asked to be open to considering whether necessary to provide a hard copy summary of the policies].
  - Maintaining the planned 7-week consultation period (rather than the required 6 weeks) despite the original rationale for extending the period due to it being intended to run over the May half-term now falling away. This was to take into account any delays in postal notifications and generally to allow more time to access material and to respond.

- 3.8 Throughout the consultation period the Planning Policy Team were available to answer email or phone queries. Details of the proposals were also easily accessible online.
- 3.9 The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020 alongside updates to our Statement of Community Involvement prior to the consultation period commencing meant we were still able to meet statutory requirements for Regulation 18 consultations.

### Feedback and questionnaire

- 3.10 Feedback from the community was sought primarily through consultation response forms, available both online on the Council website and attached to emails. A template for an easy written response was included with the letters. Comments could be made online via the Council's consultation system, Inovem, which made submitting comments on the Plan easy and accessible, allowing people to consider what they wanted to say and in their own time. Emails and letters were also accepted.

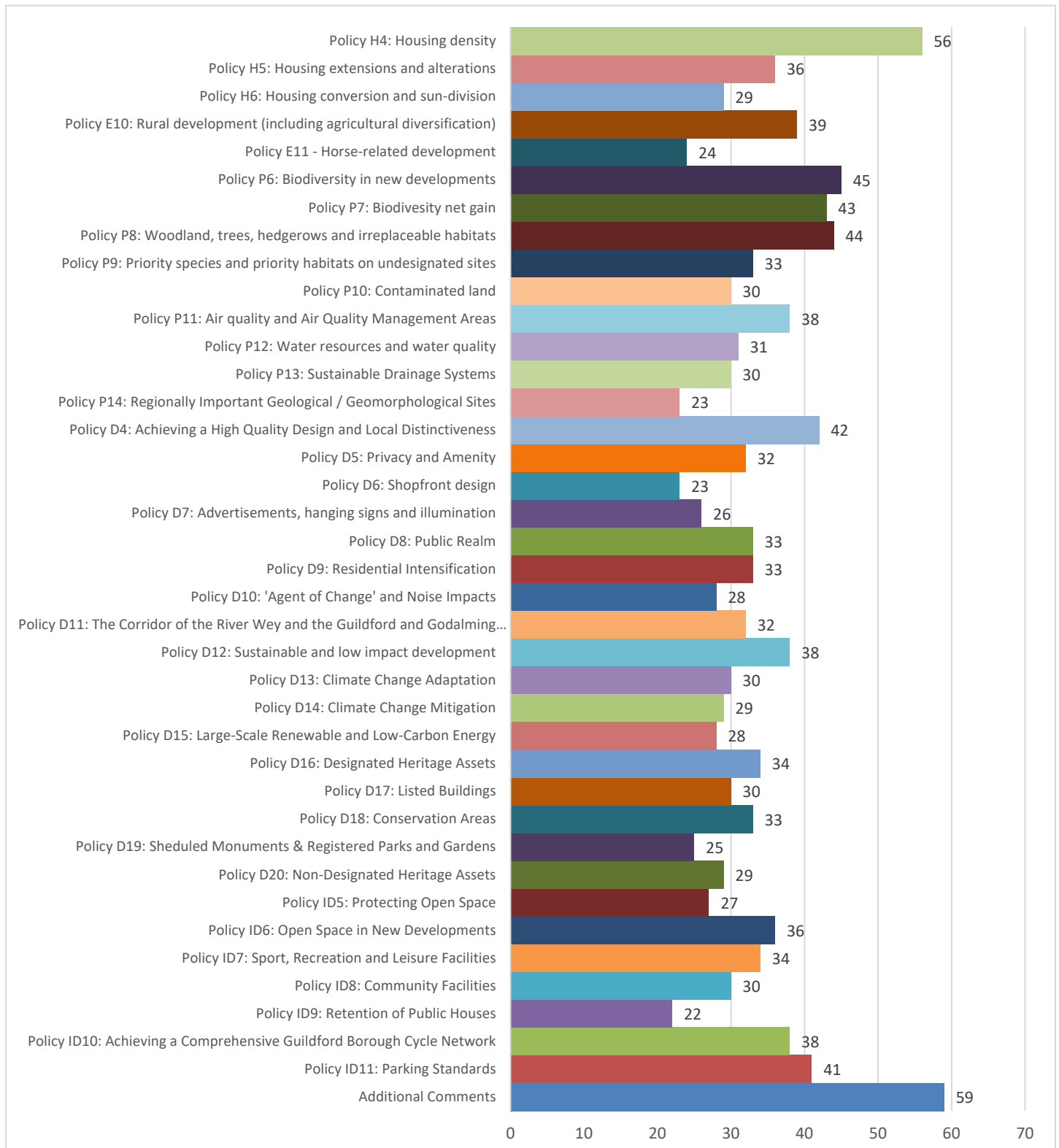
Options for providing feedback	
Online consultation system – Inovem	The primary questionnaire consisted of 39 questions. The online system allowed people to input and save their response. The portal can be accessed here: <a href="https://guildford.inconsult.uk/consult.ti/LPDMIO/consultationHome">https://guildford.inconsult.uk/consult.ti/LPDMIO/consultationHome</a>
Email and post	We set up a project postal and email address so people could send their written responses to us.
Consultation response form	This was attached to emails and letters

- 3.11 A copy of the consultation response form can be seen in Appendix 2. The 39 questions were grouped around the issues and preferred options subject matter:
- Housing policies
  - Economy policies
  - Protecting policies
  - Design policies
  - Infrastructure policies
  - Additional comments



3.12 As a result of this questionnaire and other feedback mechanisms, approximately 1313 comments were received from over 97 people, organisations and stakeholders during this consultation period. As illustrated in the chart below (Figure 3) the questions most frequently commented on were Question 39 for additional comments (59 comments received), followed by 56 comments on Question 1 on proposed Policy H1 on Housing Density.

**Figure 3: Chart showing number of comments per LPDMP Issues and Options questions**



## 4. Main Issues raised during Regulation 18 consultation

- 4.1 The Main Issues identified within the representations received during the Regulation 18 consultation in 2020 are set out in Appendix 4, along with the Council's response. For each policy, the representations have been split into three groupings – at the top of each policy table are the main issues raised by 'Prescribed Bodies' defined by Section 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as those with whom the Council has a Duty to Cooperate. This is followed by the main issues raised by other organisations/statutory consultees which are in turn followed by the main issues raised by individuals.

## 5. Compliance with the Duty to Cooperate

- 5.1 Introduced by the Localism Act 2011, the Planning and Compulsory Purchase Act 2004 (as amended) places a legal requirement on local planning authorities to engage constructively, actively and on an ongoing basis with other prescribed bodies in relation to strategic matters. Strategic matters are defined as those that would either 'have a significant impact on at least two planning areas' or concern a 'county matter', in other words in summary they raise cross-boundary issues.
- 5.2 A "county matter" has a relatively narrow definition and is in effect limited to matters relating to minerals, minerals waste, aggregates, manufacture of cement and waste. The policies in the draft LPDMP do not relate to, nor have they a significant impact upon, a county matter and therefore no strategic matters arise as a result of that part of the definition.
- 5.3 This leaves consideration of the second part of the definition and whether the policies within the draft LPDMP would 'have a significant impact on at least two planning areas'. The LPDMP forms the second part of the Council's new Local Plan. It follows on from the Local Plan: strategy and sites (LPSS) adopted in 2019. The LPSS sets the spatial development strategy and allocates specific sites in order to meet all development needs. It also includes a suite of strategic policies that set the overarching strategy to managing growth across the borough. The LPDMP does not allocate any sites and is only comprised of the more detailed development management policies.
- 5.4 Paragraph 21 of the NPPF requires that local plans identify which policies are strategic and which are non-strategic (see Appendix C of the draft LPDMP). However, simply because a policy is strategic in nature and necessary to address the strategic priorities of the area, it does not necessarily follow that the policy raises strategic matters that cross administrative boundaries. Having undertaken an appraisal of the strategic policies within the draft LPDMP, the Council is of the view that none result in any strategic cross-boundary matters because they are either:
- providing additional detail and clarification to requirements that are already set out in national policy in order to help provide clarity for both applicants and the decision maker when assessing development proposals,
  - providing for a local approach and have no/insignificant impact on neighbouring authorities; or
  - already reflecting a strategic approach that has had regard to potential cross boundary impacts.
- 5.5 The Council is therefore of the view that the legal duty to cooperate has not been engaged. Confirmation of this view was sought by writing to all neighbouring authorities and prescribed bodies. All neighbouring authorities and prescribed bodies have confirmed that they agree that there are no strategic cross boundary issues resulting from the LPDMP and therefore it is not necessary to agree any statements of common grounds.

5.6 Whilst the legal duty to cooperate may not be engaged, it is still imperative that in the process of plan-making every effort is made to ensure that the policies meet the NPPF tests of soundness. In order to do so, it is important that the prescribed bodies, who all have a statutory role within the planning system, are satisfied that the policies deliver effective outcomes insofar as it relates to their own planning remit. For this reason, the Council has ensured that there has been constructive, active and ongoing cooperation throughout the plan-making process. This has taken the form of both informal and formal engagement which is set out in more detail below.

### **Formal consultation**

5.7 The Regulation 18 consultation version of the LPDMP included not only 'issues and options' but went on to include a 'preferred option' for each policy area. It also provided significant detail in terms of the scope and content that each preferred policy might include. In doing so it ensured that the comments received, in particular from the statutory and prescribed bodies, was as meaningful and detailed as they could be. This increased the possibility of being in a position to be able to progress straight on to a Regulation 19 consultation. Please refer to Appendix 1 for a list of all consultees that were formally consulted.

5.8 As expected, this approach did result in very constructive and detailed comments from the prescribed bodies in terms of the amendments which they were seeking to ensure that the policies were effective and that they aligned with their strategic objectives. The following prescribed bodies submitted a formal representation at Regulation 18:

- Department for Education
- Environment Agency
- Highways England (now National Highways)
- Historic England
- Natural England
- Surrey County Council
- Surrey Nature Partnership
- Waverley Borough Council

5.9 Every effort was made to positively address the comments made and some of the key changes are reflected below.

- Environment Agency:
  - a) Additional policy in relation to the long-term management of biodiversity enhancement schemes in P6/P7
  - b) Additional 'priority habitats' added to P8/P9
  - c) New policy relating to watercourses and riparian corridors, including a requirement for a 10m buffer zone for main rivers, now forming part of P12
  - d) Significant additional sustainable surface water management criteria added to P13

- Historic England:
  - a) Policy related to enabling development (D21) put into a separate policy, which incorporates content no longer contained in Historic England guidance (a consequence of the introduction of an Enabling Development policy (para 202) within the NPPF) but which is considered to provide clear tests
  - b) Separated out the policies relating to Scheduled Ancient Monuments and Registered Parks and Gardens (D19 and D19a)
  - c) Provision of detailed supporting text providing thorough and comprehensive guidance to support the application of the heritage policies
  
- Natural England
  - a) Air quality policy widened to specifically include consideration of sensitive habitats and any sites designated for their nature conservation (P11)
  
- Surrey County Council
  - a) Additional policy relating to the need for preliminary archaeological site evaluation / archaeological desk-based assessments (D20)
  - b) Removal of prescribed marketing timescales and introduction of a more flexible approach to demonstrating that the retention of a community facility has been fully explored (ID8)
  
- Surrey Nature Partnership
  - a) Additional policy in relation to Natural Flood Management (P13)
  
- Waverley Borough Council
  - b) The Regulation 18 preferred option for Policy D15 was to allocate a site for large scale renewable and low carbon energy development. Given the uncertainty over where this site allocation may be located and the resulting potential cross boundary issues, Waverley Borough Council requested early joint discussions when further information was available. However, this potential cross boundary issue is no longer present as the alternative Regulation 18 policy approach has been taken forward instead in the Regulation 19 LPDMP – namely to not allocate specific sites and instead include a general policy governing renewable energy development proposals.

5.10 For a more detailed understanding about all the comments made by prescribed bodies and the resulting changes, please refer to the top of each policy's Main Issues table in Appendix 4.

## **Informal consultation**

- 5.11 Following the drafting of the Regulation 19 version of the LPDMP, a further informal consultation was undertaken with all the prescribed bodies that submitted a representation at Regulation 18 prior to the formal Regulation 19 consultation. Each prescribed body was sent a collation of the main issues they had raised together the Council's response (as contained in Appendix 4) and a copy of the draft Regulation 19 LPDMP. This process enabled the prescribed bodies to understand what changes had been made to the plan in light of their comments and gave them the further opportunity to raise any concerns or comments in relation to the emerging draft policies. The informal consultation occurred over a 4-week period from 2 August – 31 August 2021.
- 5.12 Overall, there was a positive response to the informal consultation and an acknowledgment of the changes that had been made in response to their Regulation 18 consultation comments. No further main issues were raised that caused the Council to consider alternative/amended policies to those reflected in the emerging Regulation 19 version of the LPDMP. There were however some useful comments which resulted in further, more minor, amendments being made to the policy/supporting text.

## **Ongoing targeted engagement**

- 5.13 Outside of the more 'structured' opportunities for engagement, a more targeted approach was undertaken in relation to the approach to biodiversity given its specialist and technical nature and the significant changes being proposed nationally by the emerging Environment Bill.
- 5.14 Further targeted engagement was undertaken with Natural England on the proposed policy approach in relation to biodiversity net gain (BNG) and how it sits alongside the provision of Suitable Alternative Natural Greenspace (SANG). Natural England confirmed that it supported the ambitious 20% biodiversity net gain requirement and were satisfied that the supporting text clearly details that all BNG on SANG must be above the minimum quality required for the functionality of the SANG, and states that this must be shown clearly within management plans, which provides the mechanism for which to assess the SANG and BNG. This ensures that the policy is consistent with their (then emerging) guidance.
- 5.15 The NPPF requires plans to take a strategic approach to the restoration of biodiversity and to operate at a landscape scale. Surrey's landscapes, Biodiversity Opportunity Areas and priority species and habitats cross district borders so it is important that biodiversity planning is coordinated by a central body. The Surrey Nature Partnership is the government mandated body for this role and is developing an approach for habitat restoration across Surrey. Local authorities must provide the planning policies that deliver the county approach, and it was therefore necessary for the Surrey Nature Partnership to be involved in policy development in order to ensure that policies both deliver the approach and are consistent across the wider area.

5.16 Alongside this, the context for biodiversity planning is changing rapidly at the national level and the Surrey Nature Partnership have been able to act as a critical friend, providing the expertise that is necessary to interpret and implement national approaches such as BNG. For this reason, there has been extensive ongoing engagement with the Surrey Nature Partnership which included multiple opportunities to comment and input on emerging policy wording for policies P6/P7, P8/P9 and P12 in particular. Their view on the approach to SANG and BNG was also sought to ensure it aligned with the views of Natural England.

## Appendices

- Appendix 1: Local Plan Consultees
- Appendix 2: Guildford borough Local Plan: development management policies Issues, Options and Preferred Options consultation (2020) Questionnaire and Comments Form
- Appendix 3: Guildford Borough Council press releases dated 3 June 2020
- Appendix 4: Main Issues (Regulation 18 consultations)

All documents relating to the Local Plan: development management policies consultation can be found along with other supporting information on the Guildford Borough Council website at: <https://www.guildford.gov.uk/article/25707/Part-2-of-our-Local-Plan>



## Appendix 1 - Local Plan Consultees

### Specific consultation bodies

Affinity Water  
Association of Train Operating Companies  
Civil Aviation Authority  
East Hants County Highway Authority  
EDF Energy  
Environment Agency  
Gatwick Airport Limited  
Guildford and Waverley CCG (NHS)  
Guildford Neighbourhood Police Team  
Highways England  
Historic England  
Homes and Communities Agency  
Homes England  
Inland Waterways Association  
Marine Management Organisation  
Mayor of London  
National Air Traffic Control Service NATS  
National Grid (Wood PLC)  
Natural England  
Network Rail  
North West Surrey CCG  
Office of Rail and Road  
Office of Rail Regulation  
Openreach newsites  
Police and Crime Commissioner for Surrey  
Savills (Thames Water Utilities Ltd)  
Scotia Gas Networks  
Scotland Gas Network  
Scottish and Southern Energy Power  
Distribution  
South East Water  
South West Trains  
Surrey Downs CCG  
Surrey Heartlands CCG  
Surrey Heartlands Health Care Partnership  
Surrey Heath CCG  
Surrey Police  
Surrey Water Company  
Sussex and Surrey Police  
Sutton and East Surrey Water Company  
Thames Water  
Thames Water Property Services  
The Coal Authority  
Transport for London  
UK Power Networks  
Vodafone (cable infrastructure team)  
Vodafone (property team)  
Waldon Telecom Ltd

### County Councils

Hampshire County Council  
Surrey County Council

### LPA's

Bracknell Forest Council  
Crawley Borough Council  
East Hampshire District Council  
Elmbridge Borough Council  
Epsom and Ewell Borough Council  
Hart District Council  
Mole Valley District Council  
Reigate and Banstead District Council  
Rushmoor Borough Council  
Spelthorne Borough Council  
Surrey Heath Borough Council  
Tandridge District Council  
Waverley Borough Council  
Woking Borough Council  
Wokingham Borough Council

### Parish Councils

Abinger Parish Council  
Albury Parish Council  
Artington Parish Council  
Ash Parish Council  
Bisley Parish Council  
Bramley Parish Council  
Compton Parish Council  
Cranleigh Parish Council  
East Horsley Parish Council  
East Clandon Parish Council  
Effingham Parish Council  
Ewhurst Parish Council  
Farnham Town Council  
Godalming Town Council  
Normandy Parish Council  
Ockham Parish Council  
Peaslake Community Council  
Peper Harow Parish Council  
Pirbright Parish Council  
Puttenham Parish Council  
Ripley Parish Council  
Seale and Sands Parish Council  
Send Parish Council  
Shalford Parish Council  
Shackleford Parish Council  
Shere Parish Council  
St Martha Parish Council  
Tilford Parish Council  
Tongham Parish Council  
Wanborough Parish Council  
West Horsley Parish Council  
West Clandon Parish Council

West End Parish Council  
Wotton Parish Council  
Wonersh Parish Council  
Worplesdon Parish Council

**Neighbourhood Forum**  
Burpham Neighbourhood Forum

## **General Consultation Bodies**

1 St Saviours Beavers/Cubs/Scouts  
1st Effingham Scouts  
1st Horsley Scout Group  
1st Merrow Scout Group  
1st Ripley Beavers, Cubs, Scouts  
4-Get-Me-Nots  
5th Guildford Scout Group  
7UK Services  
A L Tozer & Tozer Seeds Ltd.  
A.J. Panzarella LLC  
A2 Dominion Housing Group Ltd  
Abacus e-Media  
Abbeylands  
Abbot's Hospital  
Abbotswood Residents Association  
ABC Group  
Abri  
Acacia Home Care  
Academy of Contemporary Music  
ACE Surrey  
ACM  
Action for Children  
Action for Links for Living (ALL)  
Active Surrey  
Adams Hendry Consulting Ltd  
ADP UK  
AECOM  
Aetna Health Inc.  
Affinity Sutton  
Affinity Sutton Homes Group  
Age Concern Blackheath  
Age Concern Surrey  
Age UK Surrey  
AGM Design Build  
Ahmadiyya Muslim Association UK  
Airport Operators Association  
Airwave Solutions Ltd  
Alan Cook Consultancy  
Albury Park Freehold  
Albury Trust  
Alcis Ltd  
Aldertons Farm Residents Company Ltd  
ALDI Stores Ltd  
Alexander Dennis

AlixPartners  
Allen Fencing  
Alliance Planning Ltd  
Allianz Insurance PLC  
Allianz Management Services Ltd  
Amazon Development Centre  
AMEC E&I UK Ltd  
AMEC Environment & Infrastructure  
Amec Foster Wheeler  
Americare CSS  
Amphibian and Reptile Conservation  
Ancient Monuments Society  
Andrew Black Consulting  
Andy Trask Designs  
Angle  
ANGLE plc  
Angus Farquhar  
APA Planning Services Ltd  
Aquarian Quest, Inc.  
Arcus Consultancy Service LTD  
Armstrong Rigg Planning  
Arnold and Baldwin  
Arriva Southern Counties  
Arriva Surrey and West Sussex  
Arthritis Care  
Arthur Waller Properties Ltd  
Artington Walk Residents Association  
ASAP Architecture  
Asda  
Ash and farnham News & Mail  
Ash Citizens Advice Bureau  
Ash Grange County Primary School  
Ash Grange Sure Start Childrens Centre  
Ash Green Residents Association (AGRA)  
Ash Library  
Ash Manor School  
Ash Residents Association  
Ashill  
Ashill Developments  
Ashill Group  
Ashill Land Ltd  
Ashill Projects  
Aspect Ltd  
Associate Vail Williams  
Astenbell Ltd  
Aston Mead  
Avicam Homes Ltd  
Avison Young  
Aviva Investors  
B.P. Hydraulics Ltd  
B.W. Recycling, Inc.  
Badger Trust  
Bagnall Property Consulting  
Balmoral Homes Ltd  
Banks Solutions

Barclay Roe  
 Barlow Robbins Solicitors  
 Barnett Spooner  
 Barnwood Housing Co-operative Ltd  
 Barratt David Wilson Homes  
 Barratt Developments Plc  
 Barton Willmore LLP  
 Base Planning and Design Ltd  
 Basingstoke Canal Authority  
 Basingstoke Canal Society  
 Batcheller Monkhouse  
 Batcheller Wakefield  
 Beaufield Homes  
 Beckbridge Limited  
 Beechcroft Drive Residents Association  
 Bell Cornwell  
 Bell Cornwell LLP  
 BELLEVUE HOSPITAL  
 Bellfields Residents Association  
 Bellway  
 Belmont Preparatory School  
 Beltane Asset Management  
 Belvoir Letting Guildford  
 Bens Collectors Records  
 Berkeley Group  
 Berkeley Homes (Southern) Limited  
 Berkeley Homes (Southern) Ltd  
 Berkeley Homes Ltd  
 Berkeley Homes Southern Ltd.  
 Berkeley Strategic Land Ltd  
 BESMA  
 Bewley Homes PLC  
 Biddles  
 BIF  
 Binscombe Medical Centre  
 Biodiversity Working Group  
 Bircham Dyson Bell  
 Blackonyx Developments  
 Blackwater Valley Countryside Partnership  
 Blackwater Valley Enterprise Trust  
 Blackwater Valley Friends of the Earth  
 Blackwell Park Ltd  
 Bloor Homes  
 Blue Cedar  
 Blue Sky Performance Improvement  
 Blue Sky Planning Limited  
 BOC Limited  
 Bookham Vanguard  
 Boughton Hall Ave Residents Association  
 Bovis Homes Ltd  
 Boxgrove County Primary School  
 Boxgrove Park Residents Assoc.&Nbhd wtch  
 Boxgrove Park Residents Association  
 Boxgrove Sure Start Children's Centre  
 Boyer Planning Ltd  
 Boyer Planning Wokingham  
 Brasier Freeth Surveyors  
 BREEAM  
 Bridge End Farm, Ockham  
 British Geological Survey  
 British Horse Society  
 British Property Federation  
 British Sign & Graphics Association  
 British Toilet Association  
 British Trust - Conservation Volunteers  
 Broadway Malyan  
 Broadway Malyan Planning  
 Brook Residents Group  
 Brownies  
 Bryan Jezeph Consultancy  
 Bryan Smith Associates  
 BT Group plc  
 Buglear Bate and Co  
 Building Controls Solutions Ltd  
 Burgess International - Chartered Survey  
 Burghclere Estates LLP  
 Burneston House Dental Surgery Ltd  
 Burpham Community Association  
 Burpham Foundation Primary School  
 Burpham Neighbourhood Forum  
 Burpham Neighbourhood Plan  
 Burrows Cross Area Residents' Assoc  
 Burry and Knight  
 Bushy Hill Junior School  
 Bushy Hill Youth Club  
 Byways & Bridleways Trust  
 C & H Marketing  
 C Brewer & Sons Ltd  
 C R Toogood & Company Ltd  
 C.A.B.  
 C.P Backhurst & Co Ltd  
 CALA Homes  
 CALA Homes Southern Home Counties  
 Caldecotte Consultants  
 Camargue Ltd  
 Cameron and Cole LLP  
 Campaign for Planning Sanity  
 CAMRA Campaign for Real Ale  
 Canal & River Trust  
 Cannon Davis Commercial Interiors Ltd  
 Capgemini UK  
 Capita  
 Capita Health and Wellbeing  
 Capita Property and Infrastructure  
 Car Parking & Sustainability  
 Care for Guildford  
 Careers Support Group  
 Carers Support Guildford  
 Carlans Vehicle Contract  
 Carter Jonas LLP

Carter Planning Ltd  
 Carterwood  
 Casa Developments Ltd.  
 Cassidy Slyfield Ltd.  
 Castle Green Bowling Club  
 Castle Land and Development  
 Catesby Property Group  
 Catholic Parishes of Guildford  
 Causeway Land Investments LLP  
 CBRE Ltd  
 cctvtraining.com ltd  
 CEMEX UK Properties  
 Centaur Consulting Limited  
 CEP Associates Ltd  
 CgMs  
 CGMS Consulting  
 Charles Church Properties  
 Charles Russell LLP  
 Charlotteville Jubilee Trust  
 Charnock Environmental  
 Chelgate  
 Chemical Business Association  
 Chestnut Planning  
 Chilworth C of E Infant School  
 Chilworth2gether  
 Chinthurst Farm  
 Christ Church Guildford  
 Christ's College  
 Church of England  
 Churches Together In England  
 Circle Eight Film Group  
 Cirrus Properties  
 Citygrove  
 Civic Trust  
 CJC Wing Trust  
 CLA, Country Land & Business Association  
 Clament Limited  
 Clandon C of E Infant School  
 Clandon Regis Golf Club  
 Clifford Chance LLP  
 Clinical Commissioning Group (NHS)  
 Coast to Capital LEP  
 Cobham Conservation and Heritage Trust  
 Cobham Green Belt Group  
 Coinford Design and Build  
 Colin Smith Planning Ltd  
 Colliers CRE  
 Community Foundation for Surrey  
 Compton Village Association  
 Compton Village Club  
 Concept Developments  
 Concept2 Group  
 Conifer Developments Limited  
 Connectivity Associates Ltd  
 Consultant Supported Living  
 Council for British Archaeology  
 Council for Romany and other Travellers  
 Countryside Land and Business Assoc.  
 Countryside Properties (UK) Ltd  
 Countryside, Crest, Taylor Wimpey  
 County of Volusia  
 Courage  
 CPRE  
 CPRE Surrey  
 Craggy Island Climbing Centre  
 Cranley Road Area Residents' Association  
 Cranmore School  
 Crest Nicholson South  
 Cross Group  
 Crossroads Care Surrey  
 Crown Estate Commissioners  
 Crownhall Estates Ltd  
 CSJ Planning Consultants Ltd  
 CTC  
 Cube  
 Cubit Consulting  
 Curchods  
 Curtin&Co  
 Custom Homes  
 Cycling Embassy of Great Britain  
 Cyclists Touring Club  
 D & M Planning Limited  
 Dagero Ltd  
 Dairy Crest Group PLC  
 Dairy Crest Ltd  
 Dalton Warner Davis LLP  
 Damarel System International Ltd  
 Dan  
 Dandara Ltd  
 David J Archer Company Ltd  
 David Lock Associates  
 David Ogilvie Design  
 Davis Langdon  
 Davis Planning  
 Day Group Ltd.  
 DC Planning Ltd  
 Dean Lewis Estates  
 Deeprise Engineering Ltd  
 Defence Infrastructure Organisation  
 DEFRA  
 Deloitte LLP  
 Deloitte Real Estate  
 Dental Practice Guildford  
 Dentons  
 Department for Education  
 Dept Culture Media and Sport  
 Derbyshire Gypsy Liason Group  
 Derek Horne & Associates Ltd  
 Design Analysis Partnership  
 Design Council

Design South East  
 Designhive  
 Development Plan Services  
 Development Planning Consultants  
 DHA Planning  
 Diabetes Society  
 Dialogue  
 Diocese of Arundel and Brighton  
 Diocese of Guildford  
 Direct Design  
 Disability Alliance and Network  
 Disability Challengers  
 Disabled Motoring UK  
 Disabled Persons Railcard Office  
 District Councils Network  
 DLP Planning Consultants  
 DMH Stallard LLP  
 Dolphin Networks  
 Downsedge Residents' Association  
 Downside & Hatchford Village Hall  
 Downton Homes  
 Dowsett Mayhew  
 DP9  
 DPDS Consulting Group  
 DPDS Regional Ltd  
 DPP Ltd  
 Dray Court  
 Drayton House School  
 Drivers Jonas  
 Drivers Jonas Deloitte  
 DTZ Consulting  
 DTZ on behalf of Royal Mail  
 DTZ Piedad Consulting  
 EAD  
 Eadie, McFarland & Co. Est. 1971  
 East Guildford Residents Association  
 ECA Architecture and Planning  
 Eden Park  
 Edge 4 Planning Limited  
 Education and Skills Funding Agency  
 Education Funding Agency  
 Edward Caush & Associates  
 Edward Kingston Ltd  
 Edwin Road Residents Association  
 Effingham Residents' Association  
 Effingham Residents Co Ltd  
 Effingham Village Plan  
 Effingham Village Recreation Trust  
 Ellmer Construction (HQ)  
 Ellwood Art  
 Elmhurst hospital  
 Emmanuel Church  
 Employment Services Partnership  
 Engel Construction  
 Engineering  
 English Rural HA  
 Enterprise & Growth, University of Surrey  
 Enterprise First  
 Enterprise M3  
 Environet UK Ltd  
 ES group  
 ESP Global Services  
 Evolve Dynamics  
 Experience Guildford  
 Explore Learning Ltd  
 Exploring Surrey's Past  
 Fairlands Players  
 Fairlands, Liddington Hall and Gravetts Lane  
 Community Association  
 Fairview New Homes Limited  
 Farming and Wildlife Advisory Group  
 Farmline  
 FAT(Food and Thought)Young Adult's Group  
 FCP  
 Federation of Small Businesses  
 Fields Behind Shalford Village Hall Pres  
 Fields in Trust  
 Finch  
 Fire & Rescue  
 First Merrow Scout Group  
 First Regional Estates Ltd  
 First Wessex  
 First Wessex Housing Group  
 Firstplan  
 FLAG/FLGCA  
 FLGCA  
 Foddy Consult  
 Footsteps Registered Charity  
 Forestry Commission  
 Forsters LLP  
 Foxtons  
 Frank Taylor Planning  
 Free Running Group  
 Freight Transport Association  
 Friends International Guildford  
 Friends of Effingham Common  
 Friends of Normandy Wildlife  
 Friends of the Earth  
 Friends of the Hurtwood  
 Friends, Families and Travellers  
 Furze Hill Residents Association  
 Fusion Online Limited  
 Fusion Online Ltd  
 Futura Medical plc  
 Future Create  
 Future Planning and Development  
 G Live/Town Centre Forum  
 G R Planning Consultancy Ltd  
 G4 residents association  
 GACC

Garden Hopper  
 Gardens trust  
 Gardiner & Associates  
 Garlick's Arch Ltd  
 Gascoignes  
 Gateway TSP  
 G-BUG: Guildford Bike User Group  
 GCP Capital Partners LLP  
 Genesis Town Planning Ltd  
 George Abbot School  
 Gerald Eve LLP  
 Gerry Lytle Associates Architects  
 Gerry Lytle Associates Ltd  
 Ginger Townplanning  
 Girl Guiding Surrey West  
 GL Hearn Limited  
 Gladman Developments Ltd  
 Glaston Hill Farms Ltd  
 Gleeson Developments Ltd  
 Gleeson Land  
 Gleeson Strategic Land  
 Glenesk School  
 Goadsby and Harding Commercial  
 Godalming College  
 Godfrey Chappels Ltd  
 Godstone Highway Depot  
 GoinGreen  
 Gosden House School  
 Grant Consultancy  
 Greater London Authority  
 Green Issues Communications  
 Green Issues Communiqué  
 Green Reach Limited  
 Greenacre & Co  
 Greencroft Residents Association  
 Greenoak Housing Association  
 Gregory Gray Associates  
 Grenke Leasing Ltd  
 Grillo LLP  
 Grove Heath North Residents Association  
 GRPlanning  
 Guide Dogs  
 Guide Dogs for the Blind  
 Guildbury  
 Guildford & Godalming Athletic Club  
 Guildford & Waverley Care & Repair  
 Guildford Access Group  
 Guildford Action  
 Guildford Action for Community Care  
 Guildford Adult Learning Centre  
 Guildford Allotments Society  
 Guildford and District Jewish Community  
 Guildford and Godalming Interfaith Forum  
 Guildford and Godalming Wayfarers  
 Guildford Angling Society  
 Guildford Arabic Education Centre  
 Guildford Art Society  
 Guildford Arts  
 Guildford Baptist Church  
 Guildford Boat House  
 Guildford Borough Council (Economic Development)  
 Guildford Borough Council/Access group  
 Guildford Bowling Club  
 Guildford Business Forum  
 Guildford Business Forum Rural Group  
 Guildford Cathedral  
 Guildford Cathedral Church of Holy Spirit  
 Guildford Chamber of Commerce  
 Guildford Children's Centre  
 Guildford Citizens Advice Bureau  
 Guildford City Cricket Club  
 Guildford City FC  
 Guildford City Football Club  
 Guildford College  
 Guildford College Group  
 Guildford College of Further and Higher  
 Guildford Community Church  
 Guildford Community Family Trust  
 Guildford County Court  
 Guildford County School  
 Guildford Cricket Club  
 Guildford Cycle Forum  
 Guildford Dental Practice  
 Guildford Diocese  
 Guildford Diocese Education  
 Guildford Divisional Police  
 Guildford East Scout District  
 Guildford East Scouts  
 Guildford Environmental Forum  
 Guildford Freiburg Association  
 Guildford Goldhawks Basketball Club  
 Guildford Golf Club  
 Guildford Green Belt Group  
 Guildford Grove Children Centre  
 Guildford Grove Primary School  
 Guildford Hard of Hearing Support Group  
 Guildford High School for Girls  
 Guildford Holiday Fun  
 Guildford Homestay  
 Guildford Institute  
 Guildford Labour Party  
 Guildford Lions Club  
 Guildford Mental Health Consortium  
 Guildford Methodist Church  
 Guildford Motor Club  
 Guildford Nepalese Community  
 Guildford Orthodontics  
 Guildford Park Community Church  
 Guildford Poyle Charities

Guildford Private Renters Association  
 Guildford Pubwatch  
 Guildford Rambling Club  
 Guildford Residents Association, EGRA  
 Guildford Rowing Club  
 Guildford Rugby Club  
 Guildford Schools and Sport  
 Guildford Scout Council  
 Guildford Shakespeare Company Trust  
 Guildford Society  
 Guildford Society (planning)  
 Guildford Society / St Catherines Association  
 Guildford Society Position Paper  
 Guildford Sunset Homes  
 Guildford Theatre School  
 Guildford United Reformed Church  
 Guildford Vision Group  
 Guildford Voluntary Service/Action  
 Guildford Ying Wah Chinese School  
 Guildford YMCA  
 Guildford Youth Council  
 Guildford, Woking & Waverley FoE  
 Guildfordians Rugby Club  
 Guildowns Group Practice  
 GVA  
 GVA Grimley Ltd  
 H.C. Webb Estates Ltd  
 Hallam Land Management Ltd  
 Halow Project  
 Harestone RDP  
 Harlequin Group  
 Hart Builders  
 Harvey Water Softeners Ltd  
 Headway Surrey  
 Healthwatch Surrey  
 Heart Wood Wealth  
 Heathrow Airport  
 HECS  
 Hedleys Solicitors  
 Heine Planning  
 Henry Dolan & Associates Communications  
 Heritage Property Services  
 Hermes Investment Management  
 HGH Consulting  
 Highwood Group  
 Hillier Almshouses  
 Hi-speed Services LTD  
 HLR Consulting Ltd  
 HM Revenue & Customs  
 Holly Lodge County Primary School  
 Holmbury Cricket Club  
 Holmbury Playgroup  
 Holmbury St. Mary Holmbury Parish News  
 Holmbury Village Hall  
 Holmwood Close Residents Association  
 Holy Trinity Amenity Group  
 Holy Trinity Church  
 Holy Trinity Housing Association Ltd  
 Holy Trinity Junior School  
 Home Builders Federation  
 Home Group Housing Association Ltd  
 Home Group Ltd  
 Homeowner  
 Home-Start Guildford  
 Hoopers Probate genealogists  
 Hope Church  
 Horsley Countryside Preservation Society  
 Horsley Sports Club  
 House of Fraser  
 Houston Morris Architects  
 Howard Hutton & Associates  
 Howard of Effingham School  
 Howmanyhomes.org  
 HRG Worldwide  
 Hungarian Cultural Group Guildford  
 Hunt Kendall  
 Hunter Page Planning  
 Huntington's Disease Association  
 Hyder Consulting  
 i-Bid  
 i-build  
 Icen Projects Ltd  
 Indigo Planning Limited  
 individual  
 Information Strategies  
 Inland Homes  
 Insight Town Planning Limited  
 Institute of Directors  
 InterCall  
 Interviewing Services  
 Interviewing Services Ltd  
 IoD Surrey  
 Irish Traveller Movement in Britain  
 Islamic Society  
 Islamic Welfare Association of Surrey  
 IWA Guildford & Reading Branch  
 Jacob's Well Residents' Association  
 Januarys  
 JB Planning Associates (for Countryside Properties)  
 JB Planning Associates  
 JDC  
 Jencar Engineering  
 Jewel Consulting Ltd  
 Jillings Hutton Planning  
 JMN Developments  
 Jobcentre Plus  
 John Arnold  
 John Cooper Associates  
 John Moore Trust

Johns Associates Ltd  
 Joining In: Men's Group  
 Jones Day  
 Jones Lang LaSalle  
 JPC Consultants  
 Judith Ashton Associates  
 just a resident  
 Kahootz  
 Kalon Biological Ltd  
 Kebbell Development Ltd  
 kendall Cars  
 Kennet Properties (Thames Water)  
 Kennet Properties Limited  
 Kentucky Fried Chicken (GB) Limited  
 Keystone Legal  
 Kiely Planning Limited  
 Kier Group Plc  
 Kings College for the Arts & Technology  
 Kirkwells Town Planning  
 Kirkwood Care Ltd  
 Kitewood Estates  
 Knightsbridge Property Development Corp  
 Kossway  
 Lacey Simmons Ltd  
 Ladywell Convent  
 Laing Homes South West Thames  
 Lambert Smith Hampton  
 Land Securities  
 Land to the East of White Lane, Ash  
 Landowners Consortium Wisley  
 Lanesborough Prep School  
 Lanesborough Preparatory School  
 Langdale Planning  
 Langham Homes  
 Lanpro Ltd  
 Larkspur Art Specialists  
 Latchmere Properties Ltd  
 Latham Interiors  
 Lawn Tennis Association  
 Legal & General  
 Leigh & Glennie Ltd  
 Leith Planning  
 Level Consulting Ltd  
 Lichfields  
 Lightwood Property  
 Lightwood Strategic  
 Lilly UK  
 Line Planning  
 Lionhead Studios  
 Ilanaway Investments  
 Lo  
 Loates-Taylor Shannon Architects  
 Local Care Group  
 Local Government Association  
 Lockrite  
 Lockwood Day Centre  
 London & Hampton Developments  
 London & Scottish International Ltd  
 Long term care  
 Love Interiors  
 LPD Projects Ltd  
 LRM Planning Ltd  
 Lucas Design  
 Lucas Land and Planning  
 Luken Beck  
 Lynx Hill Residents' Association  
 Lysons & Sleeman & hoare Ltd Architects  
 M & G Real Estate  
 Macfarlane + Associates Ltd  
 MacGarvie and Co Ltd  
 Maddox and Associates  
 Maddox Associates  
 Mandalay Hotel  
 Marks and Spencer  
 Markwell & Markwell  
 Martin Grant Homes  
 Martineau  
 Mast Sanity  
 Maven Plan  
 Mayer Brown  
 McCloskey & Bingham  
 McConnell Planning  
 Medpharm Ltd  
 Meeting Point (Social Group for 50+)  
 Member of Parliament  
 Mera Management  
 Mercer Real Estate Partners  
 Mercy Medical Center  
 Merrow C of E Infant School  
 Merrow Dramatic Society  
 Merrow Methodist Church  
 Merrow Residents' Association  
 Merrow Village Club & Hall  
 MGA  
 Michael Conoley Associates  
 Michael Shanly Homes  
 Michael Williams Planning  
 Miller Developments  
 Millgate Developments Ltd  
 Millmead Court  
 Ministry of Defence  
 Ministry of Justice  
 Mitchell Evans Partnership  
 MJ Gleeson  
 MK IP Works LTD  
 Moat  
 Mobile Operators Association Ltd  
 Mole Valley Liberal Democrats  
 Monday Chat  
 Mono consultants Ltd



Montagu Evans LLP  
 Morgan Crucible  
 Morrison Supermarkets  
 Mothers' Union  
 Motion Transport Planning  
 Mott MacDonald  
 Mount Alvernia Hospital  
 Mount Green Housing Association  
 MRPP Planning  
 MTS Health Limited  
 Mulberry Property Investment Limited  
 Munro studios  
 Munro studios CGI  
 Musgrave Retail Partners GB  
 MVA Consultancy  
 N Giles Ltd  
 NaCSBA  
 Nathaniel Lichfield & Partners  
 National Bat Helpline  
 National Federation of Gypsy Liaison Gro  
 National Federation-Housing Associations  
 National Gardens Scheme Charitable Trust  
 National Planning Forum  
 National Rifle Association  
 National Small Bore Rifle Association  
 National Trust  
 Neame Sutton Limited  
 Neighbourhood Planning  
 Neighbourhood Watch  
 Neonova Design  
 New Earth Solutions  
 New Hope Centre  
 New Life Baptist Church  
 Newark Lane Residents Association  
 Newcourt Residential  
 Newman Davis & Company  
 Newship Group  
 Nexus Planning Ltd  
 NFU  
 NFU South East Region  
 NHS  
 NHS - Surrey and Sussex Area Team  
 NHS England - Hampshire Area Team  
 NHS England South  
 NHS Guildford and Waverley CCG  
 NHS Property Services Ltd  
 NHS Surrey and Sussex Area Team  
 Nichecom  
 Nicholas James Group  
 NLP Planning  
 No. 5 Chambers  
 No. 5 Project  
 Normandy Action Group  
 Normandy United Reformed Church  
 Norrells Drive Pte Ltd

Norrells Drive Association  
 North Wyke Farm, Normandy  
 Northmead Junior School  
 Northumberland Estates  
 NTR Planning  
 Number Five Project  
 NYU Hospitals Center  
 NYU Medical Center  
 Oades Plant Hire  
 Obsidian Lands Promotion (Guildford) Ltd  
 Obsidian Strategic  
 Ockham & Hatchford Residents Association  
 One Efficiency  
 Online imaging  
 Onslow County Infant School  
 Onslow Village Residents Association  
 Open Spaces Society  
 OptimEyes-UK  
 Orchard Rd residents group  
 Orestan Land Ltd.  
 OSP Architecture  
 Our Place @ Bellfields Yth & Comnty Ctr  
 Outline - Gay Lesbian  
 Owen Shipp Commercial  
 Owen Shipp Surveys  
 Owner Land West of Normandy  
 P&DG  
 PACE CNY  
 Paint Ball Games  
 Pakistan Muslim Welfare Association  
 Pancentric Digital  
 Pannell Kerr Forster  
 Paradigm Planning Ltd  
 Park Barn & Westborough Community Assoc  
 Park Barn Centre  
 Parkinsons UK  
 Parkwood Consultancy Services  
 Parkwood House  
 Parsons Brinckerhoff Ltd  
 Partners of Loseley Park  
 Pathfinder Project Consultancy Limited  
 Paton Development  
 Paul Dickinson & Associates  
 Paul Newman Property Consultant  
 Paul Winter & Co - Specialist Planning L  
 Peacock and Smith  
 Peaslake Community Fund  
 Peaslake School  
 Peck Properties  
 Pegasus Group  
 Pegasus Planning Group  
 Pelham Planning Associates Ltd  
 Penningtons Manches LLP  
 Perry Hill Ward Residents Association  
 Persimmon Homes Ltd.

Persimmon Homes Thames Valley  
 Peter Brett Associates  
 Peter Pendleton & Associates Ltd  
 Peveril Securities  
 Pewley Down Conservation Volunteers  
 Pewley Down Infant School  
 P-Fava.Consulting  
 Pharmacomm  
 PHFCE  
 Phillip Sears Designs  
 Phillips Planning Services Ltd  
 Phyllis Tuckwell Hospice  
 Pinders  
 Pinewood Group  
 Pirbright Laboratory  
 Pirbright Village Primary School  
 Places for People  
 PlanInfo  
 Planit Consulting  
 Planning and Design Group (UK) Ltd.  
 Planning Inspectorate  
 Planning Issues  
 Planning Magazine  
 Planning Perspectives LLP  
 Planning Potential  
 Plant Heritage  
 Plantation Cafe  
 Planview Planning Ltd  
 Planware Ltd  
 Pleydell Smithyman Limited  
 Police Station  
 Pond Meadow Special School  
 Porta Planning  
 Portal Planning  
 Power Race Graphics  
 Poyle Road Campaign Group  
 PPA  
 Printing House Sq. Residents Association  
 Priors Field School  
 Profesional Driving Services  
 Project Oasis North Downs  
 Propernomics  
 Property Consultant  
 Property Transfer Co-ordination  
 Protect Clandon Group  
 PRP  
 PTS of Westchester  
 Puttenham Church of England School  
 Puttenham Golf Club Ltd  
 Q+A Planning Ltd  
 Qinetiq Ltd  
 Qualidigm  
 Quartzelec  
 Queen Eleanor's C of E Junior School  
 Queen Elizabeth Park Residents Assoc.

Quod Planning  
 Radian  
 Radian Housing Group windsor  
 Raglan Housing Association  
 Ramblers Association  
 Ramsey  
 Rapleys LLP  
 Recycling company  
 Red Clam Ltd  
 Red Hot Yoga Ltd  
 Redrow  
 Reflected Reality  
 Regulatory Services, Guildford Borough Council  
 Renaissance Classics  
 Rentwood Resource Centre  
 Reside Developments Ltd  
 Residents Association Beechcroft Drive  
 Retired Historian, but still active as v  
 Reve pavilion Natural Health Clinic  
 rg+p Ltd.  
 RGJE Ltd  
 RGP- Transport Planning & Infrastructure  
 Richard Bonny Architectural Design  
 Ripley C of E Infant School  
 Ripley Carriage Ltd  
 Ripley Court Educational Trust  
 Ripley Court School  
 Riverside echg  
 Road Haulage Association  
 Robinson Escott Planning LLP  
 Rokers  
 Roland Way MCIAT  
 Romans, Land and Development  
 Rookwood Residents Association  
 Roseacre Gardens Residents Assoc.  
 Rosebery Housing Association  
 Rosemary Simmons Housing Association  
 Rotary  
 Rowen Properties  
 Royal Automobile Club  
 Royal British Legion  
 Royal British Legion Industries  
 Royal Grammar School  
 Royal Horticultural Society  
 Royal Mail  
 Royal Mail (Cushman & Wakefield)  
 Royal Society for the Protection of Birds  
 Royal Surrey County Hospital  
 RPS - Planning, Transport & Environment  
 RPS Planning & Development  
 RPS Plc  
 RSPB  
 RSPB South East Office  
 RT Design  
 Rubix Estates

Rural Group  
 Rural Solutions  
 Ruston Planning Limited  
 RVS Onward Stroke Club Guildford  
 Ryde Farm Estate  
 Rydes Hill Convent Prep School  
 Rydon  
 Rydon Homes Ltd  
 Safeguard Coaches Ltd  
 Sainsbury's Supermarkets Ltd.  
 Sallie Hair and Beauty  
 Salvation Army  
 Sanctuary  
 Sandfield County Primary School  
 SANG SOLUTIONS  
 Sanitrox Ltd.  
 Sanofi Aventis  
 Sansom Centre (MS)  
 Sapphire Asset Management  
 Save Hog's Back Campaign  
 Save Send Action Group  
 Save the Children UK  
 Saversminimart  
 Savills (UK) Ltd  
 Savills Planning  
 SCC Adult Services  
 SCC Youth Development Service  
 Schofield Lothian  
 Scott Brownrigg  
 Scott Brownrigg Planning  
 Scott Planning Associates  
 Scott Wilson  
 SE Coast Ambulance Service  
 Seale and Sands Royal British Legion  
 Send C of E Infant School  
 Send Parish Church  
 Send Village Online  
 Seniors Lunch Club  
 Sentinel Builders  
 Seven Signs  
 Seymour Estate Agents  
 Seymours Guildford  
 SGN  
 Shalford Conservation Society  
 Shalford Infant School  
 Shalford Village Bowling Club  
 Shalford Village Hall  
 Shanly Homes  
 Shawfield County Primary School  
 Shawfield Day Centre  
 SHCCG  
 Shelter  
 Shere & Peaslake Scout Group  
 Shere C of E Infant School  
 Shere Manor Estate  
 Shft  
 SHIFA  
 Shipleys LLP  
 Showman  
 Showmans Guild of Great Britain  
 Shrimplin Brown  
 Shrimplin Planning & Development  
 Sight for Surrey  
 Sigmet Planning  
 Simmons & Sons  
 Simply Planning  
 SITA  
 SITEC  
 Skills Funding Agency  
 Sladen Estates Ltd  
 Smith & Williamson  
 Smiths Gore  
 Snaky Lane Community Wildlife Group  
 Social and Recreational Project  
 Society f/t Protection of Ancient Buildings  
 Solum Regeneration  
 Solve Planning  
 Soughton Properties Limited  
 South Downs National Park Authority  
 South East Coast Ambulance Service  
 South East Planning Aid  
 South East Water c/o Adams Hendry Const  
 South East Water Ltd  
 South West Trains  
 Southern Gas Networks  
 Southern Planning Practice  
 Southern Water  
 Sovereign  
 sp2 Consulting Limited  
 Sparks - Land & Development  
 Special Products  
 Sport and Recreation Alliance  
 Sport England  
 Sports Council South East Region  
 Squires Garden Centres  
 Squires Planning  
 SSA Planning Limited  
 St Bede's C of E Junior School  
 St Catherine's School  
 St Catherines Village Association  
 St Clare's Church  
 St Franics Rectory  
 St John the Evangelists Church  
 St John's Ambulance County HQ Brigade  
 St John's Seminary  
 St Josephs Catholic Primary School  
 St Joseph's Church  
 St Joseph's RC Junior School  
 St Mark's Church Wyke  
 St Mary C of E Church

St Mary's C of E Infant School  
 St Mary's Church  
 St Nicolas C of E Infant School  
 St Nicolas' Church  
 St Paul's C of E Infant School  
 St Peter's Catholic Comprehensive School  
 St Peters School Merrow  
 St Peter's Shared Church  
 St Saviours Church & Centre  
 St Teresa's Prep School  
 St Thomas of Canterbury Catholic Primary  
 St. Catherines' Village Association  
 St. Luke's Park Residents Association  
 St. Modwen Properties PLC  
 St. Peters Shared Church  
 Stagecoach  
 Stagecoach Guildford  
 Stagecoach Guildford North  
 Stamford Associates Limited  
 Star Oyster  
 Status Environmental Limited  
 Steer Davies Gleave  
 Stellco Developments Ltd  
 Stevens and Bolton LLP  
 Stocton Road Residents Association  
 Stoke next Guildford Residents Associati  
 Stoughton Action Group  
 Stoughton Infant School  
 Stoughton Youth Centre  
 Strategic Aviation Special InterestGroup  
 Strategic Planning Advice Ltd  
 Strathmoor Developments Limited  
 Streetcar  
 Strutt & Parker LLP  
 Stuart Hicks Design Services  
 Super Camps  
 Supergonk  
 Surrey Advertiser Ltd  
 Surrey Amphibian and Reptile Group  
 Surrey Archeological Society  
 Surrey Army Cadet Force  
 Surrey Association for Visually Impared  
 Surrey Badger Protection Society  
 Surrey Bat Group  
 Surrey Chambers of Commerce  
 Surrey Coalition of Disabled People  
 Surrey Community Action  
 Surrey Connects  
 Surrey Countryside Access Forum  
 Surrey County Council Education (Secondary)  
 Surrey County Council Public Health  
 Surrey County Playing fields Association  
 Surrey Economic Partnership  
 Surrey Education Business Partnership  
 Surrey Federation of W.I's  
 Surrey Fire and Rescue Service  
 Surrey Gardens Trust  
 Surrey Gypsy Traveller Communities Forum  
 Surrey Hampshire Borders CAMRA  
 Surrey Hants Borders Branch CAMRA  
 Surrey Heathland Project  
 Surrey Hills AONB  
 Surrey Hills Conservation Volunteers  
 Surrey Hills Enterprises  
 Surrey Historical Association  
 Surrey History Service  
 Surrey Independent Living Council  
 Surrey Industrial History Group  
 Surrey Islamic Society, Surrey Universit  
 Surrey Law Society  
 Surrey Minority Ethnic Forum  
 Surrey Museums Consultative Committee  
 Surrey Nature Partnership  
 Surrey Playing Fields  
 Surrey Police's Lesbian & Gay  
 Surrey Quality Leisure Services  
 Surrey Satellite Technology Ltd  
 Surrey Scouts  
 Surrey Sports Park  
 Surrey Traveller Community Relations  
 Surrey Wildlife Trust  
 Surrey Women's Aid  
 Surrey Young Farmers Clubs  
 Surrey Youth Focus  
 Surya Hotels Ltd  
 Sustainable Land PLC  
 Sustainable Land Products Limited  
 SVM- Building Services Design  
 SWT Countryside Services Ltd  
 Synergy - Construction and Property  
 Consultants  
 Talk Surrey - Stroke Recovery  
 Tanner Tilley  
 Taylor Wimpey plc  
 Taylor Wimpey South West Thames Ltd  
 Taylor Wimpey Strategic Land  
 Tenet Health System  
 Terence O'Rourke for M&G Real Estate  
 Terence O'Rourke Ltd  
 Terence O'Rourke Ltd for M&G Real Estate  
 Tesni  
 Tetlow King Planning  
 Tetra Tech Planning  
 TGCG  
 Thai Terrace Restaurant  
 Thakeham Homes  
 Thakeham Homes Ltd  
 The Auto-Cycle Union Limited  
 The Bahai Community of Guildford  
 The Barn Youth Project

The Barn, Effingham  
 The Bat Conservation Trust  
 The Boileroom  
 The Cafe  
 The Celia Cross Greyhound Trust  
 The Chine Consultancy Advice Ltd  
 The Church of St. John the Evangelist  
 The Clandon Society  
 The Conservation Studio  
 The Co-operative Group  
 The Co-operative Group and Scape Living  
 The Court Residents Association  
 The Deltic group  
 The Disabled Persons Transport  
 The Electric Theatre  
 The Fairlands Practice  
 The Forum of Mobility Centres  
 The Friary  
 The Georgian Group  
 The Glass and Knob Connection  
 The Good Intent Public House  
 The Guildford Institute  
 The Guildford Society  
 The Gypsy Council  
 The Herald Players  
 The House Group  
 The House of Commons  
 The Howard Partnership Trust  
 The Learning Corporation LLP  
 The Lifetrain Trust  
 The London Green Belt Council  
 The Losely Estate  
 The Mandolay Hotel  
 The Matrix Trust  
 The Milestone Society  
 The Motor Neurone Disease Association  
 The National Trust  
 The National Trust - London and SE  
 The Nomads  
 The Northumberland Estates  
 The Nuance Group UK Ltd  
 The Pirbright Institute  
 The Planning Bureau Ltd  
 The Planning Bureau Ltd (for McC&Stone)  
 The Planning Inspectorate  
 The Raleigh School  
 The Ripley Society  
 The RSPB  
 The Shah Jahan Mosque  
 The Showmen's Guild of Great Britain  
 The Spinney Sure Start Children's Centre  
 The Student Health Centre  
 The Surrey and Hampshire Canal Society  
 The Surrey Hills Board  
 The Surrey Hills Society  
 The Theatres Trust  
 The Trustee's of the Tyman Pension Scheme  
 The Twentieth Century Society  
 The Tyman Pension Scheme  
 The University of Surrey Students' Union  
 The University of The Third Age  
 The Victorian Society  
 The Wey and Arun Canal Trust  
 The Wilky Group  
 The Willows  
 The Woodland Trust  
 The York Road Project  
 Theatres Trust  
 Theatretrain  
 Three Valleys Water  
 Tibbalds Planning and Urban Design  
 Tillingbourne Junior School  
 Tilthams Green Residents Association  
 TMA Chartered Surveyors  
 Tongham Community  
 Tongham Scout Group  
 Tongham Wood Improvement Group  
 Tormead School  
 Tourism South East  
 Towers Watson  
 Town Centre Chaplaincy  
 Town Centre Signage Group  
 Town Planning Bureau  
 Tozer Seeds Ltd  
 Trans Lease Services  
 Transform Housing & Support  
 Traveller Law Reform Project  
 Travellers' Times  
 TREG Consulting  
 Tribal MJP  
 Troy Planning and Design  
 TSG Consulting  
 Tudor Cottage  
 Tudors  
 Tunsgate Square Shop  
 Turley  
 Turley (for land securities)  
 Tyman Pension Scheme  
 Tyting Society  
 UCA  
 UK Association of Preservation Trusts  
 UKIP Woking Branch  
 UNICHEM LTD  
 Union4 Planning  
 UniS LGBT+ Society  
 Universities Superannuation Scheme Ltd.  
 University of Surrey  
 University of Surrey Students Union  
 University of Turin  
 Unlimited Mind

Unofficial Onslow Village Website	Weyfield Primary Academy
Urban Saints Youth Group	Weyfield Residents Association
Urbangroup Property Development	Weymount Neighbourhood Group
Vail Williams LLP	White and Sons
Vail Williams LLP (for Thakeham Homes)	White Lion Walk Centre Manager
Vaughan House, Hostel for Men and Women	White Young Green PlanningWhitmoor
VC Godalming Haslemere - Surrey Hills	Common Association
Verve Planning	Williams Brothers
Vincent Homes - Bespoke New Housing	Williams Property Management
Vincent Knight	Windacres Ltd (residents)
Vinci Construction	Wisley Action Group
Virgin Media	Wisley Property Investments Ltd
Vision Engineering Ltd	Woking College
Vision for Guildford Ltd - GVG	Wokingham Borough Council
Visionhall Information Systems Ltd	Wood E&I Solutions UK Ltd
Visit Britain	Wood Plc
Visit Surrey CIC	Wood Street County Infant School
Voluntary Action South West Surrey	Wood Street Village Association
Volunteer Centre Ash	Woodcock Bros Wimbledon Limited
Volunteer Centre Guildford	Woodhams - Family Trees
Vortal Properties Ltd	Woodlands Park Residents Association
W. DAVIES solicitors	Woodstreet Village Association
WAAG	Woolf Bond Planning
Waitrose Ltd	Working Property Ltd
WallMates Ltd	Worplesdon and District Bridleways Assoc
Ward Member for Burpham	Worplesdon County Primary School
WASHA	WS Planning
Waterden Dental Practice	WS Planning & Architecture
Watkin Jones Group	WSP
WBDRA.	WYG Environmental Planning Transport Lim
Welbeck Land	WYG Group
West Surrey Badger Group	WYG Limited
West Surrey Divisional Commander	WYG Planning
West Waddy ADP	Wyke Primary School
Westborough & District Residents Org.	Wynngate
Westfield (Friary Centre)	YMCA
Wey & Arun Canal Trust	Yomen Club
Wey and Arun Canal	Yvonne Arnaud youth Theatre
Wey Estates Ltd	Zinhome Limited
Wey House School	
Wey Valley Indoor Bowling Club	

We also notified all other residents, business owners and other stakeholders on our database who have asked to be notified of future Local Plan consultations. A total of 2775 emails were sent out, and 51 letters.

**Appendix 2 - Guildford borough Local Plan: development management policies Issues, Options and Preferred Options consultation (2020) Consultation Response Form**



GUILDFORD  
BOROUGH

[www.guildford.gov.uk](http://www.guildford.gov.uk)

**Tracey Coleman**  
Director of Planning and Regeneration

<Name>  
<Address Line 1>  
<Address Line 2>  
<Town>  
<County>  
<Postcode>

<Date>

## Draft Local Plan: Development Management Policies Issues and Preferred Options Consultation

Dear Sir or Madam,

Guildford Borough Council has produced a **Local Plan: development management policies - Issues and Preferred Options** document and will be consulting on the document from **12:00 midday Wednesday 3 June to 12:00 midday Wednesday 22 July 2020**.

I am writing to you because you have previously indicated that you would like to receive notifications about planning policy consultations. If you would prefer to receive email notifications, or no longer wish to receive these notifications in the future, please email us at [planningpolicy@guildford.gov.uk](mailto:planningpolicy@guildford.gov.uk).

If you would like to comment on the draft 'Local Plan: development management policies - Issues and Preferred Options' document, please visit the consultation homepage at <https://guildford.inconsult.uk/consult.ti/LPDMIO/consultationHome>. Please use the 'Online questionnaire' to respond to the consultation.

Alternatively, you can let us know your views by emailing [localplan@guildford.gov.uk](mailto:localplan@guildford.gov.uk), or by returning the enclosed paper questionnaire by post to: Planning Policy, Guildford Borough Council, Millmead House, Millmead, Guildford, Surrey, GU2 4BB.

Due to current Covid-19 restrictions, paper copies of the documents will not be available to view at the Council office main reception at Millmead or in the Guildford borough libraries. Should circumstances change during the consultation period, paper copies will be made available for viewing in these locations. In view of these restrictions, we have enclosed a summary of the Local Plan: development management policies - Issues and Preferred Options document, which sets out the content of each preferred policy option and provides space for you to let us know your thoughts on the preferred options identified and whether you have other comments on what the plan should contain. If you would like more detail of these proposals, please view the Local Plan: development management policies - Issues and Preferred Options document online, or if you are unable to do so, please contact the planning policy team: via email: [planningpolicy@guildford.gov.uk](mailto:planningpolicy@guildford.gov.uk), or phone: 01483 444 471.

Your comments will be published alongside your name, but your personal details, such as your email or postal address, will not. Verbal or anonymous comments cannot be taken into consideration.

We look forward to hearing from you,

Yours faithfully,  
Tracey Coleman  
Director of Strategic Services



## Draft Local Plan: Development Management Policies Issues and Preferred Options Consultation

### Consultation Response Form

#### Introduction

The Council adopted the Local Plan: strategy and sites in 2019. We have now started to work on the second part of the Local Plan, the 'Local Plan: development management policies' document. This document will provide further and more detailed planning policies to use when we determine planning applications.

The 'Local Plan: development management policies' document is currently in the early stages of its production. This Regulation 18 'Issues and Options' consultation, which invites comments on the draft 'Local Plan: development management policies – Issues and Preferred Options' document is the first opportunity to comment on the plan as it moves through the various stages of its production.

The document identifies a series of key issues for the borough and the policy options that could help address them. It then highlights the Council's preferred policy options for potential development management policies that will guide decision-making on development applications across Guildford borough.

As part of this consultation we are seeking your thoughts on the preferred options identified and whether you have other comments on what the plan should contain.

#### Consultation

In order to assist our residents who do not have access to the online document, or who may be unable to respond by email or online, we have produced this brief summary of the Regulation 18 'Local Plan: development management policies – Issues and Preferred Options' consultation document. The summary includes a brief overview of the aim and content for each preferred option in relation to each policy issue, followed by the relevant consultation question.

There are 39 questions in total, which replicate the question boxes in the full Issues and Preferred Options document. You may respond to as many questions as you wish throughout the questionnaire. If you would like to view the full 'Local Plan: Development Management Policies - Issues and Preferred Options', please visit the consultation homepage at <https://guildford.inconsult.uk/consult.ti/LPDMIO/consultationHome>. If you are unable to do so, please contact the planning policy team.

**HAVE YOUR SAY** - You may respond to the consultation in the following ways:

- **Online:** by using the 'Online questionnaire', found on the website linked above (this is our preferred method of response),
- **Email:** by emailing [localplan@guildford.gov.uk](mailto:localplan@guildford.gov.uk), or
- **Post:** by completing the enclosed questionnaire and returning this by post to: Planning Policy, Guildford Borough Council, Millmead House, Millmead, Guildford, Surrey, GU2 4BB. You can also write a letter.

If you email or write to us, please indicate clearly which question/preferred option each of your comments relates to.

After the consultation, we will publish your comment with your name, but will not publish personal details such as your email or postal address.

We will consider all comments submitted as part of this Regulation 18 consultation prior to preparing the next version (Regulation 19) of the draft Local Plan, which will be subject to further consultation. We will also publish an Interim Consultation Statement identifying main issues raised and our response to these. If submitting the questionnaire, you may use additional pages of paper to ensure that you have responded fully, please note which question each additional sections of comments relates to.

The consultation will be open from **12:00 midday Wednesday 3 June to 12:00 midday Wednesday 22 July 2020**. Comments submitted outside of this period will not be accepted.

## How to read this plan

### Green boxes

contain the relevant policies from the adopted Guildford borough Local Plan: strategy and sites 2015-2034. **These policies are not part of this Regulation 18 consultation.**

### Blue boxes

contain the summary of the preferred policy options in the draft Local Plan: development management policies – Issues and Preferred Options document, including their aims and how these aims are intended to be achieved.

### Pink boxes

contain the consultation questions and give the opportunity for you to respond and make suggestions.

## Document Summary

### Chapter 2: Housing

#### **Existing relevant policies from the adopted Local Plan: strategy and sites (2019) – for information purposes only.**

Policy H1: Homes for all

Policy H2: Affordable homes

Policy H3: Rural exception homes

#### Policy H4: Housing density

Please refer to pages 10 to 16 of the full Issues and Preferred Options document.

#### **Policy Aim**

The aim of this policy is to enable appropriate residential densities in high quality design-led schemes.

#### **How this will be achieved**

This is achieved by having a policy that requires making the best use of land whilst meeting a range of criteria such as taking into account the site size, characteristics and location, urban grain, appropriate building form and sizes for the site and the context and local character of the area. Higher densities are expected in Guildford Town Centre, on strategic sites allocated in the LPSS or within 500 metres of transport interchanges (defined in the LPSS).

#### **Question 1:**

Do you agree with the preferred option to address housing density in Guildford?

Do you have any other comments or suggestions?

Please write your response here:



### Policy H5: Housing extensions and alterations

Please refer to pages 17 to 21 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to achieve high quality designs for extensions and alterations.

#### How this will be achieved

This is to be achieved by setting out a policy with detailed design criteria for extensions and alterations that requires consideration of the impact on the street scene, neighbours and the existing property. Extensions and alterations must respect the existing context, scale and character of the adjacent buildings and immediate surroundings, not have an unacceptable impact on the privacy, sunlight and daylight of occupants in adjacent buildings and be consistent with the form, scale, character and proportion of the existing building.

Proposals for basement extensions are required to be well-designed, proportionate and ensure that their potential impact on the local environment, trees, tree roots, garden area, architectural character of the property, neighbouring properties and residential amenity is acceptable, and have no adverse impact on local ground water conditions, flooding or drainage issues. Applications are expected to include a structural impact report to show that there is no adverse impact to land and the structural stability of the application site and adjacent properties.

Development of a residential annex will be permitted if the extension is subordinate in scale to the main residence, it is integrated into the main dwelling house unless it is an outbuilding, it clearly shares either bathroom or kitchen facilities with the main dwelling house, it cannot be used as a self-contained dwelling and it would share the vehicular access and garden area.

#### Question 2:

Do you agree with the preferred option to address housing extensions and alterations in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

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

Please refer to pages 22 to 24 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to achieve high quality conversions and sub-divisions of buildings to flats, studios or bedsits.

#### How this will be achieved

This is achieved by setting out a policy ~~with~~ that supports high quality development involving the conversion of dwellings into flats, studios or bedsits provided that the balance of housing types and character of the immediate locality is not adversely affected, there is sufficient amenity space available and it would not be detrimental to the amenity of neighbouring residents.

#### Question 3:

Do you agree with the preferred option to address housing conversion and sub-division in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

## Chapter 3: Economy

### Relevant policies from the Local Plan: strategy and sites

Policy E1: Meeting employment needs

Policy E2: Locations of new employment floorspace

Policy E3: Maintaining employment capacity and improving employment floorspace

Policy E4: Surrey Research Park

Policy E5: Rural economy

Policy E6: The leisure and visitor experience

Policy E7: Retail and leisure uses in Guildford Town Centre

Policy E8: District Centres

Policy E9: Local Centres and isolated retail units

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

Please refer to pages 25 to 31 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to support economic growth and local communities in rural areas.

#### How this will be achieved

This will be achieved by encouraging certain new economic uses and expansion of such uses in these areas, where proposed uses are not in conflict with national Green Belt policy or other Local Plan policies.

The National Planning Policy Framework (NPPF) indicates the broad types of development considered appropriate in principle in the Green Belt (paragraphs 145-146). Provided a development proposal fits into these categories and complies with other Local Plan policies, then a rural development policy could support small-scale outdoor sport or outdoor recreational facilities in these areas. Similarly, it could support the conversion of vacant or redundant agricultural buildings to small-scale business, or recreational uses.

The policy would support a wider range of new uses in rural areas not protected by Green Belt designation, provided they require a countryside location, and respect the countryside's character, in accordance with Policy P3 of the Local Plan: Strategy and Sites (2019). Such uses could include small-scale tourist attractions and leisure facilities, farm diversification proposals and small-scale business enterprises.

Any support for a proposed 'main town centre use' in a rural area under the policy would be subject to it passing, as necessary, a sequential test, and impact test. These tests are explained in paragraphs 86-90 of the NPPF; main town centre uses are defined in the NPPF's glossary.

**Question 4:**

Do you agree with the preferred option to address rural development in Guildford?  
Do you have any other comments or suggestions?

Please write your response here:



### Policy E11: Horse-related development

Please refer to pages 32 to 36 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to address the adverse impacts that may arise from the approval of planning applications for horse-related development.

#### How this will be achieved

This will be achieved by setting criteria related to visual (i.e. landscape character), neighbourhood amenity and biodiversity impacts, bridleway erosion and impacts on highway safety.

The policy would support small-scale horse related development if planning applicants demonstrate that their proposed development satisfactorily addresses these criteria. The neighbourhood amenity impacts include impacts on neighbouring or nearby properties by reason of noise, smell, overlooking and other general disturbance.

The policy would also give particular consideration to the cumulative effects of proposals in the vicinity of the proposed application site and wider area.

For development to be supported, it must also ensure adequate availability of land for proper animal care, including stabling, grazing and exercise, in line with the Government's most recently published standards (currently Defra's *Equine Code of Practice for the Welfare of Horses, Ponies, Donkeys and their Hybrids*).

#### Question 5:

Do you agree with the preferred option to address horse-related development in Guildford?

Do you have any other comments or suggestions?

Please write your response here:



## Chapter 4: Protecting

### Relevant policies from the Local Plan: strategy and sites

Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value

Policy P2: Green Belt

Policy P3: Countryside

Policy P4: Flooding, flood risk and groundwater protection zones

Policy P5: Thames Basin Heaths Special Protection Area

### Policy P6: Biodiversity in new developments

Please refer to pages 43 to 51 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is maximise biodiversity gains in all new developments

#### How this will be achieved

This would be achieved by establishing biodiversity as a priority in new developments, requiring biodiversity measures, landscaping, planting schemes and tree planting to support the Surrey wide strategic approach, and take account of biodiversity strategies and provide resilience to climate change. Buildings should include features that support biodiversity and sites that contain or are adjacent to sensitive habitats should include design measures that protect them.

#### Question 6:

Do you agree with the preferred option to address biodiversity in new developments in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

### Policy P7: Biodiversity net gain

Please refer to pages 52 to 57 of the full Issues and Preferred Options document.

#### **Policy Aim**

The aim is to provide clarity and detail for the requirement for developments to aim to achieve biodiversity net gain set out in policy ID4.

#### **How this will be achieved**

This would be achieved by clarifying that net gain in biodiversity means a minimum gain of 20%, applying to all new developments, barring exceptions such as brownfield sites. It sets out a methodology that accords with the emerging national net gains approach, allowing off-site measures where it cannot be achieved on-site, or a financial contribution if neither are achievable. The policy supports proposals for new biodiversity sites.

#### **Question 7:**

Do you agree with the preferred option to address biodiversity net gain in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

**Policy P8: Woodland, trees, hedgerows and irreplaceable habitats**

Please refer to pages 58 to 63 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to protect important woodlands, trees, hedgerows and irreplaceable habitats.

**How this will be achieved**

This is achieved by identifying specific habitats that will be considered irreplaceable, refusing harmful developments except in wholly exceptional cases, setting a methodology for assessing harm, and setting out a specific approach to protecting ancient woodland and significant trees.

**Question 8:**

Do you agree with the preferred option to address woodland, trees, hedgerows and irreplaceable habitats in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

**Policy P9: Priority species and priority habitats on undesignated sites**

Please refer to pages 64 to 66 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to protect species and habitats that are not covered by Policy ID4 (which protects designated sites).

**How this will be achieved**

This is achieved by requiring developments on or adjacent to sites with priority species or habitats to enhance the relevant features and setting an approach to mitigation. Priority habitats and species are those protected by law, identified in Surrey Nature Partnership and Natural England strategies and the NPPF, and habitat compensation sites. Wildlife corridors and biodiversity 'stepping stones' also receive protection.

**Question 9:**

Do you agree with the preferred option to address priority species and habitats on undesignated sites in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

### Policy P10: Contaminated Land

Please refer to pages 67 to 69 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to support the remediation of despoiled, contaminated or unstable land on appropriate sites, whilst preventing increased risk to sensitive receptors from potential sources of contamination.

#### How this will be achieved

This is achieved by placing requirements on developers to ensure that all appropriate investigations and assessments are carried out and provided with the application in order to determine the extent to which land is contaminated and that the land is made fit for its intended purpose through the implementation of any necessary remediation, design and site layout measures.

#### Question 10:

Do you agree with the preferred option to address contaminated land in Guildford?

Do you have any other comments or suggestions?

Please write your response here:



### Policy P11: Air Quality and Air Quality Management Areas

Please refer to pages 70 to 73 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to ensure new development does not have adverse impact on air quality and seeks opportunities to actively improve air quality.

#### How this will be achieved

This is achieved by placing requirements on developers to ensure that new development does not give rise to adverse impacts on health and quality of life from air pollution, seeks to reduce exposure to poor air quality across the borough, and improve levels of air pollutants in Air Quality Management Areas (AQMA).

#### Question 11:

Do you agree with the preferred option to address air quality and Air Quality Management Areas in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

**Policy P12: Water resources and water quality**

Please refer to pages 74 to 77 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to ensure new development does not have an adverse impact on water quality.

**How this will be achieved**

This is achieved by placing requirements on developers to seek opportunities to improve water quality, avoid a detrimental impact on the flow or quantity of groundwater, and contribute towards Water Framework Directive water bodies maintaining or achieving 'Good Ecological Status'.

**Question 12:**

Do you agree with the preferred option to address water resources and water quality in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

### Policy P13: Sustainable Drainage Systems (SuDS)

Please refer to pages 78 to 81 of the full Issues and Preferred Options document.

#### **Policy Aim**

The aim of this policy is to provide greater clarity on what the Council expects from developers in relation to the SuDS schemes.

#### **How this will be achieved**

This is achieved by placing requirements on developers to ensure that proposals for major development incorporate SuDS where required by the lead local flood authority and that the SuDS schemes satisfy technical standards and design requirements.

#### **Question 13:**

Do you agree with the preferred option to address sustainable drainage systems in Guildford?

Do you have any other comments or suggestions?

Please write your response here:



**Policy P14: Regionally Important Geological/Geomorphological Sites**

Please refer to pages 82 to 83 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to protect Regionally Important Geological/Geomorphological Sites (RIGS).

**How this will be achieved**

This is achieved by having a policy that grants permission for development where the value of RIGS sites will not be harmed unless clear justification is provided.

**Question 14:**

Do you agree with the preferred option to address sustainable drainage systems in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

## Chapter 5: Design

### Relevant policies from the Local Plan: strategy and sites

Policy D1: Place shaping

Policy D2: Climate change, sustainable design, construction and energy

Policy D3: Historic environment

### Policy D4: Achieving High Quality Design and Local distinctiveness

Please refer to pages 87 to 91 of the full Issues and Preferred Options document.

#### Policy Aim

This policy aims to enable the consistent delivery of high-quality and sustainable design, that is fit for purpose across the borough, whilst ensuring the protection of character and local distinctiveness. Or in cases where there is less of an urban context, to create distinctive and attractive new environments that sit harmoniously within their surroundings.

#### How this will be achieved

This is to be achieved by setting out a range of detailed considerations and good design principles that need to be considered and addressed by development applications to achieve the high quality of development sought by the borough. This will include consideration of the following main components of good design, context, movement, layout, form & scale, appearance, landscape, materials and detailing.

#### Question 15:

Do you agree with the preferred option to address high quality design and local distinctiveness in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

### Policy D5: Privacy and Amenity

Please refer to pages 92 to 93 of the full Issues and Preferred Options document.

#### Policy Aim

This policy aims to seek to protect the quality of life of all occupiers and neighbours or, in the case of mixed-use development, the viability of business premises, from issues such as detrimental loss of daylight and sunlight, loss of privacy and outlook, harmful noise, odour, vibrations and air pollution.

#### How this will be achieved

This is achieved by setting out detailed amenity considerations and design principles that need to be considered and addressed by all development applications to ensure good design in the provision of amenity, amenity uses and privacy.

Development will be expected to protect privacy and amenity of communities, all occupiers and neighbours; maximises opportunities for the provision of private outdoor amenity space, and provide sensitive lighting schemes that achieve their purpose, without adverse glare or light spillage on close and longer views.

#### Question 16:

Do you agree with the preferred option to address privacy and amenity in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

### Policy D6: Shopfront design

Please refer to pages 94 to 95 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to:

- Provide a consistent and integrated approach towards the design and appearance of shop fronts.
- To achieve high quality shop fronts that are accessible to all through inclusive design
- To encourage high quality and thoughtful design that is both sympathetic to the scale and character of the host building and streetscape and contributes positively to the vitality of the areas daytime and evening economy without detriment to safety and security.

#### How this will be achieved

This is to be achieved by stipulating that development applications for improvements to or wholesale replacement of shop front units need to be well designed and allow for easy access for all. Where security measures are proposed, the policy will seek to ensure that these are of an appropriate design, with a presumption against features and materials that will cause harm to the character and appearance of the street.

#### Question 17:

Do you agree with the preferred option to address shopfront design in Guildford?

Do you have any other comments or suggestions?

Please write your response here:



### Policy D7: Advertisements, hanging signs and illumination

Please refer to pages 96 to 97 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to:

- Provide a consistent and integrated approach towards the design and illumination of advertisements and signage
- Ensure that the design and management of signs and adverts improve and enhance the visual amenity of the area, and don't cause conflict with road and pedestrian safety

#### How this will be achieved

This is achieved by setting out design principles that need to be considered and addressed by development applications in order to ensure an appropriate and consistent design of advertisement and illumination within the borough.

Generally, there is a presumption that signage and advertisement must be of a high-quality design, that its sensitive to the visual appearance of the building, the surrounding street scene and general views. Where works directly or indirectly impact on a heritage asset, the presumption will be that works would be permitted where it can be demonstrated that it would not result in adverse harm to the integrity of the building's design, historical character, structure or setting.

There is also a presumption against proposals for internal and/or external illumination, unless it can be demonstrated that the premises rely principally on trading after dark.

Proposals that create a hazard to pedestrians or road users or cause visual intrusion through light pollution will be resisted.

#### Question 18:

Do you agree with the preferred option to address advertisements, hanging signs and illumination in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

### Policy D8: Public Realm

Please refer to pages 98 to 100 of the full Issues and Preferred Options document.

#### Policy Aim

This policy aims to ensure that development creates or contributes to a safe, attractive, high quality, inclusive and legible streets and spaces that positively contributes to local character and identity and encourages appropriate levels of activity and social interaction.

#### How this will be achieved

This is achieved by setting out a detailed criteria for assessing the public realm element of new development proposals. This will include consideration of general principles such as design, materials, connectivity, legibility and context, as well as the consideration of public art.

The policy also aims to enable opportunities for flexible multi-use community spaces, as well as on street 'alfresco' dining, with moveable furniture to be achieved.

In the case of public art, the policy recognises its value to the quality of the environment when it is well considered, designed and appropriate, but also stipulates that it will be considered and assessed against the Council's Art Strategy.

#### Question 19:

Do you agree with the preferred option to address public realm in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

### Policy D9: Residential Intensification

Please refer to pages 101 to 103 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to enable residential intensification and development within inset villages that respects the prevailing characteristic of the area.

#### How this will be achieved

This is achieved by setting design principles that will apply to residential intensification schemes, including specific criteria for schemes within villages inset from the Green Belt.

In the case of residential intensification section of the policy, this has been designed to provide support to those proposals that make the best use of land, whilst establishing or enhancing a sense of place and identity, which avoids isolated and piecemeal development. Layouts ought to have a positive relationship with existing neighbouring development, taking into account appropriate back to back or back to front distances. To ensure that proposals come forward in an integrated manner, designs should ensure that landscaping, parking, refuse storage and collection facilities are planned from the outset.

Furthermore, where the Council considers that land has come forward which could be incorporated into a more comprehensive scheme, it will require appropriate infrastructure contributions from individual proposals, which may be lower than the normal thresholds.

Where villages are now inset from the Green Belt, proposals will be expected to respect the prevailing grain of development, introduce forms of development which reflect the character and context of the village, ensure that the transitional edge of village character is maintained and avoid layout that are overly formalised.

#### Question 20:

Do you agree with the preferred option to address residential intensification in Guildford?

Do you have any other comments or suggestions?

Please write your response here:



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

Please refer to pages 104 to 109 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to ensure that new development can be integrated effectively with existing businesses, community facilities and 'noise-sensitive' uses such as residential uses, by developing a policy that articulates the 'agent of change' principle and manages noise impacts. The principle of 'agent of change' is that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

#### How this will be achieved

This is achieved by setting design principles that will apply to residential intensification schemes, including specific criteria for schemes within villages inset from the Green Belt.

#### Question 21:

Do you agree with the preferred option to address the 'Agent of Chance' principle and noise impacts in Guildford?

Do you have any other comments or suggestions?

Please write your response here:



**Policy D11: Corridor of the River Wey and the Guildford and Godalming Navigation**

Please refer to pages 110 to 112 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to support the protection and enhancement of these corridors, including their visual quality, setting, amenity, ecological value, architectural and historic interest and views within and from.

**How this will be achieved**

This is achieved by supporting development which promotes high quality contextual design; seeks to improve access to, from and positively contributes to enhancing the landscape and biodiversity of the riparian environment.

**Question 22:**

Do you agree with the preferred option to address the corridor of the river Wey and Guildford and Godalming Navigation in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

### Policy D12: Sustainable and low impact development

Please refer to pages 119 to 125 of the full Issues and Preferred Options document.

#### **Policy Aim**

The aim of this policy is to provide greater detail to supplement adopted Policy D2 where it supports sustainable and low impact development.

#### **How this will be achieved**

This is achieved by setting requirements for schemes to follow an energy efficiency first approach, choose materials with low embodied carbon (except for conservation and heritage reasons), ensure buildings are adaptable and incorporate water efficiency measures. Schemes of £400,000 should implement Site Waste Management Plans to reduce waste.

#### **Question 23:**

Do you agree with the preferred option to address sustainable and low impact development in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

**Policy D13: Climate Change adaptation**

Please refer to pages 126 to 129 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to deliver climate change resilient development.

**How this will be achieved**

This is achieved by requiring buildings to be designed and constructed to provide for the comfort, health and wellbeing of occupants taking account of the expected climate impacts, incorporate passive cooling measures. Schemes are required to minimise the urban heat island effect through choice of materials, site design and use of green and blue spaces and to be adapted for more frequent and severe rainfall events and wildfires when in high risk areas.

**Question 24:**

Do you agree with the preferred option to address climate change adaptation in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

**Policy D14: Climate Change mitigation**

Please refer to pages 130 to 131 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to deliver climate change mitigation measures.

**How this will be achieved**

The Council is not proposing a policy at this stage as the government is currently considering a change to national standards that could result in a reduction in maximum allowed carbon emissions from new dwellings and a more effective method of measuring performance. Once the outcome is known, the Council will consider whether a local policy should be developed. The Council currently has a policy in place (policy D2 of the LPSS) that requires new buildings to perform at least 20 per cent better on carbon emissions than national standards.

**Question 25:**

Do you agree with the preferred option to climate change mitigation in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

**Policy D15: Large-scale renewable and low-carbon energy**

Please refer to pages 132 to 135 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to facilitate large scale renewable and low carbon development.

**How this will be achieved**

This is achieved by allocating land for low and zero carbon energy developments while requiring new energy developments to protect biodiversity.

**Question 26:**

Do you agree with the preferred option to large scale renewable and low carbon energy in Guildford?

Do you have any other comments or suggestions?

Please write your response here:



### Policy D16: Designated heritage assets

Please refer to pages 142 to 147 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to set out a positive strategy for the conservation and enhancement of all designated heritage assets

#### How this will be achieved

This policy has been designed to provide more clarity with regards to the following three issues, supporting information, loss of significance and enabling development.

In the case of supporting information, this will be achieved by placing a requirement on developers to submit proportionate evidence and justification for every application affecting a designated heritage asset in accordance with our validation criteria.

With regards to loss of significance, the policy would stipulate that proposal which result in harm to, or loss of significance are to be considered in line with the policies set out in the NPPF (specifically paragraphs 194 -196).

Applications that are to be considered as enabling development will be required to validate compliance with all the tests set out in Historic England's Enabling Development Policy, in addition to demonstrating that alternative solutions are inappropriate. This would be subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development restoration of the heritage asset

#### Question 27:

Do you agree with the preferred option to address designated heritage assets in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

### Policy D17: Listed Buildings

Please refer to pages 148 to 151 of the full Issues and Preferred Options document.

#### Policy Aim

The policy aims is to provide more operational detail for proposals which specifically affect listed buildings, directly or indirectly, to ensure their continued protection.

#### How this will be achieved

This is achieved by setting out a policy with a range of detailed considerations and best practice principles that need to be considered and addressed by development applications to safeguard the significance of a listed building and/or its setting.

For development to be supported, alterations, extension and repair work must respect the architectural and/or historical significance of the listed building by having due regard to matters such as design, appearance, context & character; reinforcing the intrinsic character of the asset; and the safeguarding of structural integrity, plan form and historical features.

Proposals that seek to adapt to, or mitigate the effects of climate change, will be supported provided that they safeguard the special interest and significance of the heritage asset or its setting. Where conflict arises between the climate mitigation objectives and the conservation of heritage assets, this will be assessed against public benefit.

#### Question 28:

Do you agree with the preferred option to address listed buildings in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

### Policy D18: Conservation Areas

Please refer to pages 152 to 156 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to provide more operational detail for development proposals which affect development which specifically affect Conservation Areas, to ensure their continued protection.

#### How this will be achieved

This will be achieved by setting out a range of detailed considerations and best practice principles that need to be considered and addressed by development applications to ensure the preservation and enhancement a conservation area and/or its setting.

The policy is designed to support development that preserves and/or enhances townscape features, such as building/building groups, historical settlement patterns, plot widths, historic building lines and open spaces, that contribute positively to the area's character and appearance. It also seeks to ensure that all new development, including extensions and alterations to existing buildings, is of a high-quality design, that reinforces or compliments the prevailing character, by having regard to matters such as, scale, height, massing, form, and materials.

There is also a presumption for the retention of attractive/significant traditional materials, features and detailing, such as original doors, windows, chimneys and boundary walls, where they exist.

#### Question 29:

Do you agree with the preferred option to address conservation areas in Guildford?

Do you have any other comments or suggestions?

Please write your response here:



### Policy D19: Scheduled Monuments & Registered Parks and Gardens

Please refer to pages 157 to 161 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to provide more operational details for development proposals that specifically affect Scheduled Monuments and Registered Parks and Gardens, to ensure their continued protection.

#### How this will be achieved

This is achieved by identifying a presumption against substantial harm to or loss of these assets.

Additionally, there will be an expectation that in the case of Scheduled Ancient Monuments, for consideration to be given to the condition and management of the monument, its existing and future security and the desirability of increasing its understanding, interpretation and public access.

Proposals which affect a registered historic park and garden will be expected to preserve or enhance its special historic interest/significance. With a presumption that development which detract from the enjoyment, layout, design, character, appearance, setting, or key views from the park will be resisted, and features that form an integral part of its significance, retained. Works which would prejudice its future restoration will also be considered unfavourable.

#### Question 30:

Do you agree with the preferred option to address Scheduled Monuments & Registered Parks and Gardens in Guildford?

Do you have any other comments or suggestions?

Please write your response to questions 27, 28, 29 and 30 here:

### Policy D20: Non-designated heritage assets

Please refer to pages 162 to 167 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to ensure that the value and significance of the borough's non-designated heritage assets are recognised and safeguarded so that they can continue to contribute to the richness of the historic environment and help to inform future development and regeneration.

#### How this will be achieved

This is achieved by identifying a presumption for their retention and enhancement, as well as placing requirements on developers to support all applications with a proportionate evidence and justification.

#### Question 31:

Do you agree with the preferred option to address non-designated heritage assets in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

## Chapter 6: Infrastructure

### Relevant policies from the Local Plan: strategy and sites

Policy ID1: Infrastructure and delivery

Policy ID2: Supporting the Department for Transport's "Road Investment Strategy"

Policy ID3: Sustainable transport for new developments

Policy ID4: Green and blue infrastructure

### Policy ID5: Protecting Open Space

Please refer to pages 170 to 172 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to provide detail and clarity for policy ID4 in order to enhance protection open space. It clarifies the approach by setting criteria that must be met in order for open space to be considered surplus and confers additional protection on open spaces that have a specific importance. It allows development that is beneficial to open spaces.

#### How this will be achieved

This is achieved by preventing the loss of existing open space except for narrow circumstances defined in the NPPF.

#### Question 32:

Do you agree with the preferred option to address protecting open space in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

**Policy ID6: Open Space in new developments**

Please refer to pages 173 to 178 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to ensure that new developments provide new open spaces that provide best value in terms of multi-functional benefits.

**How this will be achieved**

This is achieved by setting size thresholds at which new developments must provide different types of open space on site, setting out the amounts of different types of open space that must be provided in order to meet needs, and sets quality criteria for new open spaces.

**Question 33:**

Do you agree with the preferred option to address open space in new developments in Guildford?

Do you have any other comments or suggestions?

Please write your response here:



**Policy ID7: Sport, recreation and leisure facilities**

Please refer to pages 179 to 180 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to support the appropriate provision of sport, recreation and leisure facilities.

**How this will be achieved**

This is achieved by supporting development that provides, increases or improves opportunities for public sport, recreation and leisure, including schemes for new, replacement and extensions to existing facilities, and engineering works, if they support and enhance the rights of way network. Large facilities must restrict built development to only that necessary and, where they would have high water usage, do not abstract from environmental stock or the public water supply.

**Question 34:**

Do you agree with the preferred option to address sport, recreation and leisure facilities in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

**Policy ID8: Community facilities**

Please refer to pages 181 to 186 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to ensure that community facilities are accessible to serve residents' needs.

**How this will be achieved**

This is achieved by expecting that community facilities are accessible by walking, cycling and public transport, co-locating compatible facilities together, resisting their loss to other uses and supporting complementary or ancillary uses associated with community facilities.

**Question 35:**

Do you agree with the preferred option to address community facilities in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

### Policy ID9: Retention of Public Houses

Please refer to pages 187 to 192 of the full Issues and Preferred Options document.

#### Policy Aim

The aim of this policy is to prevent the loss of public houses to other uses.

#### How this will be achieved

This will be achieved through new requirements for assessing planning applications for change of use involving the loss, or partial loss, of a public house. These include for the business to be marketed as a public house and alternative community facility for a continuous period of at least 18 months.

For public houses outside the boundary of the town centre (beyond which there are fewer accessible alternative venues), applicants will also be required to undertake and provide details of:

- public consultation to ascertain the value of the public house to the local community;
- an evaluation of the public house's continued commercial viability; and
- an assessment of alternative licensed premises within easy walking distance of the public house which is the subject of the application; and whether such alternative premises offer similar facilities.

#### Question 36:

Do you agree with the preferred option to address the retention of public houses in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

**Policy ID10: Achieving a comprehensive Guildford borough cycle network**

Please refer to pages 193 to 196 of the full Issues and Preferred Options document.

**Policy Aim**

The aim of this policy is to achieve a comprehensive Guildford borough cycle network.

**How this will be achieved**

This will be achieved by updating the Policies Map using the cycle network plan outputs from the following sources:

- Guildford BC's Route Assessment Feasibility Study, for the Guildford urban area.
- Surrey CC's Guildford Local Cycling Plan, particularly for the rest of the borough outside of the Guildford urban area.

The Policies Map will therefore show specific routes along which the Council, working with Surrey County Council the Local Highway Authority and other partners, will undertake or promote measures to encourage cycling, including improvements to the safety and convenience of the routes, the designation of cycle tracks, the designation of cycle lanes, and the signposting and the provision of cycle parking facilities.

The policy will require that new developments have regard to the Guildford borough cycling plan, as represented on the updated Policies Map, in addressing the requirements of Policy ID3 Sustainable transport for new developments in the Local Plan: Strategy and Sites.

**Question 37:**

Do you agree with the preferred option to address achieving a comprehensive Guildford borough cycle network in Guildford?

Do you have any other comments or suggestions?

Please write your response here:



### Policy ID11: Parking Standards

Please refer to pages 197 to 201 of the full Issues and Preferred Options document.

#### Policy Aim

The aims of this policy are:

- in Guildford town centre to optimise the density of, and to limit the level of car trip making associated with, new residential developments.
- in the rest of the borough to avoid the problems of congested on-street parking in new residential developments and overspill parking on adjacent local streets.
- to achieve appropriate provision of car parking associated with non-residential developments across the borough.

#### How this will be achieved

This will be achieved by:

- defining standards for the provision of off-street parking for new developments in the borough, specifically with maximum car parking standards for residential developments in Guildford town centre, minimum car parking standards for residential developments in the rest of the borough, and expected vehicle parking standards for non-residential developments across the borough.
- defining minimum cycle parking standards for new developments across the borough.
- defining electric vehicle charging standards for new developments across the borough.

#### Question 38:

Do you agree with the preferred option to address parking standards in Guildford?

Do you have any other comments or suggestions?

Please write your response here:

## Additional Comments

**Question 39:**

Do you have any other comments or suggestions for issues that should be considered within the Plan?

Please write your response here:

## Appendix 3 - Guildford Borough Council press releases 3 June 2020

PR 12237

For Immediate Release

03 June 2020

### Share your views to shape sustainable development in our borough from 3 June

Sustainable development, protecting natural habitats, supporting the rural economy and high-quality design across the borough are at the heart of Guildford's preferred approach to the second part of its Local Plan.

The Local Plan is our plan that shapes and controls the future development of Guildford borough. We adopted the Local Plan: strategy and sites (the first part of the Local Plan) last year which focused on allocating sites to meet identified need in terms of housing and employment. Now we are producing detailed policies, called Development Management Policies, that will be used to ensure future development meets the highest standards in terms of design quality and meeting the climate change emergency. They will protect the special character of the borough and will be used to guide decisions on whether or not planning applications are granted permission.

From 3 June you will be able to have your say on the preferred policy approaches when a seven-week public consultation begins. The consultation runs until 12pm on 22 July.

Cllr Jan Harwood, Lead Cllr for Climate Change says: "Sustainable development, protecting our environment and supporting economic growth across the borough are at the heart of new policies which form part of Guildford's adopted Local Plan. We'd like to hear your views on the specialist planning policies that will help protect the unique character of our borough and ensure we have the highest quality development in Guildford and our surrounding villages. Please do get involved and share your views when the consultation opens - you can help us make a difference."

We want to hear your comments on the 38 policies covering topics which include:

- Ensuring high-quality, sustainable design is in keeping with the attractive historic character of our borough
- Protecting the natural environment and local wildlife including woodland, trees and other habitats
- Minimising the impact of any new development on air quality in the borough
- Promoting high quality standards of energy, water and carbon efficiency to reduce the effect of climate change
- Protecting and enhancing accessibility to good quality open space and community facilities
- Encouraging people out of their cars by creating a Guildford borough-wide cycle network

The consultation presents 'issues and options' relevant to Guildford and goes on to suggest a 'preferred option' or approach for each policy. All comments received will be considered as part of preparing the next version of the plan that will form the basis of the document submitted to the Secretary of State for examination.

To comment visit <https://guildford.inconsult.uk/consult.ti/LPDMIO/>. Due to the current coronavirus restrictions, we are unable to provide a paper copy for residents to review at our Council offices or libraries. If you wish to discuss any aspect of the consultation, you can call our Planning Policy team on 01483 444471 or email [planningpolicy@guildford.gov.uk](mailto:planningpolicy@guildford.gov.uk).

### Ends

Notes to Editor: Press contact: Claire Andrews, Communications Officer; tel: 01483 444337 or e-mail: [claire.andrews@guildford.gov.uk](mailto:claire.andrews@guildford.gov.uk) . For all the latest Guildford Borough Council news go to [www.guildford.gov.uk](http://www.guildford.gov.uk) and follow us on Twitter @GuildfordBC

## **Appendix 4 - Main Issues (Regulation 18 consultations)**

## Policy H4: Housing Density

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
Left blank	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'.
Left blank	<b>Environment Agency</b>	Left blank
Left blank	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.
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	<p>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 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>Policy H4 is now deleted and aspects relating to density incorporated within proposed Policy D4 ‘Achieving high 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>
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank

Page 12 to 20	<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.</p> <p>Comment: the term 'unsustainable' is not defined. We need a mix of homes across the borough please see previous comments on high density Homes.</p> <p><b>Box:</b> 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.</p> <p>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.</p> <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>
Left blank	<p>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.</p>	<p>The 500 metres &amp; transport interchanges criterion is no longer incorporated in the proposed policies.</p>
Left blank	<p>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.</p> <p>This section should list Neighbourhood Plans as a further source of design Guidance.</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</p>

Left blank	Left blank	read as a whole and appropriate weight given to its component parts, so replication in the Local Plan is not necessary.
Left blank	<b>Downsedge Residents Association</b>	Left blank
Left blank	<p>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;"</p> <p>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.</p> <p>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 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>	Policy H4 has now been replaced by Policy D4 which requires 'appropriate residential densities' that are demonstrated to result from a design-led 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 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).
Left blank	<b>East Horsley Parish Council</b>	Left blank



Left blank	<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>
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	<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</p>

Left blank	Left blank	considering relevant Neighbourhood Plan policies.
Left blank	<b>Guildford Residents Association</b>	Left blank
Left blank	<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>
Left blank	<b>Merrow Residents Association</b>	Left blank
Left blank	<p>I support this option but the policy should also have due regard to personal wellbeing, welfare and security We would be expecting:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> </ul>	<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 in an average density across a site being within such a range, it is often the location of different development forms</p>

Left blank	Left blank	across a site which are more important in considering whether a proposal is appropriate.
Left blank	<ul style="list-style-type: none"> <li>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</li> </ul>	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.
Left blank	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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 Mellow and Burpham.</li> </ul>	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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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.	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

Left blank	Left blank	impact on an area's prevailing character and setting.
Left blank	<b>Martin Grant Homes</b>	Left blank
Left blank	<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. 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>
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	<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</p>

Left blank	Left blank	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 Development Plan so specific mention in the Local Plan is not necessary.
Left blank	<b>Woodland Trust</b>	Left blank
Left blank	<p>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)</p>	<p>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</p>

Left blank	Left blank	linkages between them wherever possible.
Left blank	<b>Home Builders Federation</b>	Left blank
Left blank	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.
Left blank	<b>West Clandon PC</b>	Left blank
Left blank	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.
Left blank	<b>Weyside Urban Village</b>	Left blank
Left blank	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'.
Left blank	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	Policy D4 (4) states 'Development proposals will be expected to demonstrate high quality

Left blank	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.	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.
Left blank	<b>Worplesdon Parish Council</b>	Left blank
Left blank	Housing density needs to include size of houses.	Density differs to housing sizes. Housing mix, including sizes, is addressed in LPSS policy H1 (1).
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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:	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,

Left blank	<p>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.</p> <p>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.</p> <p>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 <u>DPHa</u> for the local area within a 300metre radius of the site within a tolerance of +/- 25%.</p> <p>Thirdly: There should be a policy on Height in the Borough.</p>	<p>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.</p> <p>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>
Left blank	<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</p>



Left blank	Left blank	scale and the character of the local area.
Left blank	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.	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.
Left blank	<b>Blackwell Park Ltd and the University of Surrey</b>	Left blank
Left blank	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.	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.
Left blank	<b>Cranley Road Residents Association</b>	Left blank
Left blank	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: <ul style="list-style-type: none"> <li>• To protect strategic views and townscapes.</li> <li>• 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.</li> <li>• To protect established character near transport hubs in rural settlements.</li> <li>• To avoid the route of the sustainable movement corridor becoming a linear high-rise wall carving up the town scape of Guildford.</li> </ul>	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.

Left blank	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.	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.
Left blank	Reasons why higher density may be inappropriate should be exemplified in the policy.	It is not appropriate for a policy to give examples.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	<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</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.

Left blank	<p>applicant is allowed something which is then refused to someone else. Densities in designated 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"> <li>• Designated sites where dwelling numbers are already specified</li> <li>• Designated town centre - a limit of 130dph would be reasonable</li> <li>• Area within 400m of the centre boundary, or the main station - 85 dph.</li> <li>• No extra dwellings to be allowed in Conservation Areas where the average density is already 50dph or higher.</li> </ul> <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>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 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>
Left blank	<b>Merrow Residents Association</b>	Left blank
Left blank	<p>We agree with the preferred option. We would be expecting:</p> <ul style="list-style-type: none"> <li>• a set of structured and challenging target density rings around Guildford and the main villages</li> <li>• consciously maximising the density around the hubs and closest to the best travel connections</li> </ul> <p>keeping the suburban and country areas to lower densities where the transport hubs are weaker</p>	<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</p>

Left blank	Left blank	transport hubs has now been removed as considered unnecessary.
Left blank	<ul style="list-style-type: none"> <li>• making better use of energy efficient building structures and design, allowed by higher density building</li> <li>• 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</li> </ul>	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.
Left blank	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	Housing space standards are addressed by LPSS policy H1(3) Homes for all. The Burpham 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.
Left blank	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.

Left blank	<b>Normandy Action Group</b>	Left blank
Left blank	<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 (Marrow) 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 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>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 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>
Left blank	<b>Burpham Community Association (BCA)</b>	Left blank
Left blank	<p>Do you agree with the preferred option to address housing density in Guildford? Yes, but...</p> <ol style="list-style-type: none"> <li>1) Further consultation should be held to determine what density is appropriate for each of the strategic sites</li> <li>2) It is not valid to consider Guildford East (i.e. Marrow) Railway station as a transport interchange until/unless there is a binding commitment to build it – at present this seems very unlikely.</li> </ol>	<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</p>

Left blank	Left blank	that result from a design-led approach. This will help determine the appropriate density for strategic sites.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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.	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.
Left blank	<b>Councillor Ruth Boswell</b>	Left blank
Left blank	<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?</p> <p>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>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</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

	<p>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>schedule.</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>
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Left blank	<b>Portland Capital</b>	Left blank																									
Left blank	<p>Portland Capital are supportive of promoting higher density residential development in sustainable locations such as the town centre. GBC's Annual Monitoring report (2018-2019) identifies: <b>Table 1: Previous Housing Completions</b></p> <table border="1" data-bbox="360 411 1601 715"> <thead> <tr> <th data-bbox="360 411 801 443">Monitoring Period</th> <th data-bbox="801 411 1003 443">2015/16</th> <th data-bbox="1003 411 1205 443">2016/17</th> <th data-bbox="1205 411 1406 443">2017/18</th> <th data-bbox="1406 411 1601 443"></th> </tr> </thead> <tbody> <tr> <td data-bbox="360 475 801 507">2018/19</td> <td data-bbox="801 475 1003 507"></td> <td data-bbox="1003 475 1205 507">Total</td> <td data-bbox="1205 475 1406 507"></td> <td data-bbox="1406 475 1601 507"></td> </tr> <tr> <td data-bbox="360 539 801 571">Completions</td> <td data-bbox="801 539 1003 571">387</td> <td data-bbox="1003 539 1205 571">294</td> <td data-bbox="1205 539 1406 571">299</td> <td data-bbox="1406 539 1601 571">351</td> </tr> <tr> <td data-bbox="360 603 801 635">,331</td> <td data-bbox="801 603 1003 635"></td> <td data-bbox="1003 603 1205 635"></td> <td data-bbox="1205 603 1406 635"></td> <td data-bbox="1406 603 1601 635"></td> </tr> <tr> <td data-bbox="360 667 801 699">Delivery against target (562)-175</td> <td data-bbox="801 667 1003 699"></td> <td data-bbox="1003 667 1205 699">-268</td> <td data-bbox="1205 667 1406 699">-263</td> <td data-bbox="1406 667 1601 699">-211</td> </tr> </tbody> </table> <p data-bbox="360 699 1601 730">917</p> <p data-bbox="360 730 1601 826">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 data-bbox="360 826 1601 858">Section 11 of the NPPF relates to making effective use of land. Paragraph 123 states:</p> <p data-bbox="360 858 1601 994"><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. In these circumstances:</u></i></p> <p data-bbox="360 994 1601 1201"><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 data-bbox="360 1201 1601 1297"><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 data-bbox="360 1297 1601 1430"><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</u></i></p>	Monitoring Period	2015/16	2016/17	2017/18		2018/19		Total			Completions	387	294	299	351	,331					Delivery against target (562)-175		-268	-263	-211	<p data-bbox="1601 300 2056 675">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.'</p> <p data-bbox="1601 675 2056 1185">In this light, a prescriptive approach to setting 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.</p> <p data-bbox="1601 1185 2056 1430">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</p>
Monitoring Period	2015/16	2016/17	2017/18																								
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	<p><u>making efficient use of a site</u> (as long as the resulting scheme would provide acceptable living standards).</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>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>
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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 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.	Agree. Policy H4 is deleted and density issues addressed within policy D4 'Achieving high quality design and reflecting local distinctiveness'.
Left blank	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

Left blank	Left blank	details on specific factors including heritage.
Left blank	<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>	<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>
Left blank	<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"> <li>• <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></li> <li>• <i>the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and</i></li> <li>• <i>the importance of securing well-designed, attractive and healthy places.</i></li> </ul> <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>	<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.'</p>

Left blank	Left blank	Revised policy D4 is consistent with the NDG & NPPF.
Left blank	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 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.	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 applying a mathematical calculation. Policy D4 now reflects a requirement for 'appropriate residential densities' that result from a design-led approach.
Left blank	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.
Left blank	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.
Left blank	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	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

Left blank	<p>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.</p>	<p>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.</p>																		
Left blank	<p>At local level, character has been extensively considered within existing and emerging Neighbourhood Plans as follows:</p> <table border="1" data-bbox="369 742 1545 1141"> <thead> <tr> <th>Neighbourhood Plan</th> <th>Approach to Character</th> </tr> </thead> <tbody> <tr> <td>Burpham</td> <td>Approach to character set out in appendix 2</td> </tr> <tr> <td>West Horsley</td> <td>Approach to Character set out in appendix C</td> </tr> <tr> <td>East Horsley</td> <td>Significant reference to Housing Design Styles</td> </tr> <tr> <td>Lovelace</td> <td>Design guide in appendix C5</td> </tr> <tr> <td>Effingham</td> <td>Separate Village Design Statement</td> </tr> <tr> <td>Send</td> <td>Separate Character Assessment</td> </tr> <tr> <td>West Clandon</td> <td>Separate Character Assessment</td> </tr> <tr> <td>Puttenham</td> <td>Separate design guide</td> </tr> </tbody> </table> <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</p>	Neighbourhood Plan	Approach to Character	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>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 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>
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Left blank	<p>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>	<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 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>
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	<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"> <li>1. Under the preferred option at point 1c there should be reference to the character of the landscape setting which is equally important.</li> <li>2. Specific densities for specific 'characters/types' of areas needs to be provided within the proposed policy.</li> <li>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.</li> <li>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.</li> <li>5. Reference to Neighbourhood Plans should be included as these give specific local knowledge and density measurements that must be taken into consideration.</li> </ol>	<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</p>

Left blank	Left blank	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.
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	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.	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.
Left blank	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.	The reference to transport interchanges is removed from the proposed policies as it is considered unnecessary.

Left blank	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”.	Left blank
Left blank	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 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.	The reference to strategic sites is now removed. Policy D4 requires all 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.
Left blank	I <b>object</b> 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.	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.
Left blank	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.	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.
Left blank	It does require that a lot more oversight and careful explanation, seen the less prescriptive way decisions are being made for each particular case.	The reasoned justification for Policy D4 will explain the policy in detail.

Left blank	<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>
Left blank	<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.</p>	<p>Conversions of buildings to housing alone will not meet the overall need for additional housing within the borough.</p>
Left blank	<p>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 <b>height limitations</b>. 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).</p>	<p>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 &amp; heights for the site.</p>
Left blank	<p>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</p>	<p>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</p>



Left blank	<p>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.</p>	<p>states 'Development should respond positively to the history of a place...landscape and topography.'</p>
Left blank	<p>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.</p>	<p>Updated Policy D4 requires appropriate residential densities that result from a design-led approach.</p>
Left blank	<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"> <li>a) the site size, characteristics and location,</li> <li>b) the urban grain of the area and appropriate building forms and sizes for the site, and</li> <li>c) the context and local character of the area</li> </ul> <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>	<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>
Left blank	<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</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>

Left blank	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	Left blank
Left blank	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.	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.
Left blank	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.	Updated Policy D4 requires development proposals to reflect appropriate residential densities that take into account appropriate heights, the context and local character.
Left blank	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".	Reference to transport interchanges has now been deleted.

## Policy H5: Housing extensions and alterations

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	<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.</p> <p><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 <a href="#">Flood Zone and flood risk tables 1, 2 and 3</a> 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 <a href="#">flood risk standing advice (FRSA)</a>, unless it is located within 20 metres of a main river.</p> <p><i>2. 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 &amp; 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>

Left blank	<p><b>3. <u>Basement extensions</u></b> 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’.</p> <p>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><b>4. <u>Annexes</u></b> 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>	Left blank
Left blank	<b>Historic England</b>	Left blank
Left blank	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. Additional wording added to reasoned justification inserting reference to this.
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	Yes, in general support. Further explanatory [text] might be added to emphasise not compromising urban Green Infrastructure/BNG provision opportunities	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.

## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Thames Water</b>	Left blank
Left blank	<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> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol>	<ol style="list-style-type: none"> <li>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. 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.</li> <li>2. Text added to the reasoned justification of the policy relating to having pumped devices for basement developments that include a waste outlet.</li> </ol>
Left blank	<b>Burpham Community Association</b>	Left blank

Left blank	<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>
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
<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.</p> <p>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'.</p> <p>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>
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	<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.</p> <p>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>
Left blank	<b>Downsedge Residents Association</b>	Left blank

Left blank	<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)c and height is referenced in (1) a. 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>
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	<p>1. We <b>agree</b> with Policy H5 with the below caveats: The shift towards more home working, less commuting &amp; 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>
Left blank	<b>East Horsley Parish Council</b>	Left blank
Left blank	1.We agree with one exception: In Paragraph 1(a) there is a reference to respecting the existing context, scale and character	1.To consider a proposal, whilst the wider context is relevant it is the immediate surrounding area that is most pertinent. To just

Left blank	<p>of the adjacent buildings and immediate surrounding area. However, 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:</i>  Delete the word "immediate" from Paragraph 1(a) of Policy H5;  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.</p>	<p>state 'surrounding area' is considered too broad and 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>
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	<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.  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.  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>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	<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.  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</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>



Left blank	<p>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 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><b>Options.</b></p> <ul style="list-style-type: none"> <li>• Extensions must not increase the size (volume) of the house from that of the original by more than 40%.</li> <li>• Driveways and pavement crossovers must not be multiplied.</li> <li>• Permitted development rights will be removed for certain areas.</li> </ul> <p>5. No extensions to be allowed for 5 years after the purchase, including for new houses</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>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. <u>Article 4 directions</u> 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 (<u>PPG Para: 038 Reference ID: 13-038-20190722</u>)</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>
Left blank	<b>Guildford Residents Association</b>	Left blank

Left blank	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	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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>West Clandon</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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> . 2. The policy either needs extension or an appendix to provide more detail. Other authorities provide far greater guidance in a	1. Agree, wording of policy reviewed to include during construction and once built. 2. Permitted development rights frequently change, and some are temporary so reference within the LPDMP is not

Left blank	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.	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.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Para 2.15	<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>1. The main difference between the <u>Local Plan 2003</u> Policies H8 Extensions to dwellings in urban areas &amp; 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, height, design, appearance and character of, and have no unacceptable impact upon, the adjacent buildings and immediate surrounding area this addresses both urban and rural settings.</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 LP is unnecessary.</p> <p>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</p>

<p>Left blank</p>	<p>sympathetically is required.</p> <p>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. .</p> <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</p>	<p>addresses 'character types' and gives detailed design advice on matters such as context, urban structure and grain.</p> <p>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.</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. <u>Article 4 directions</u> 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 (<u>PPG Para: 038 Reference ID: 13-038-20190722</u>)</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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Left blank	<p>detrimental impact on the character of existing communities.</p> <p>9. Part 20 of the <u>Town and Country Planning (Permitted Development and Miscellaneous Amendments) (England) (Coronavirus) Regulations 2020</u> (see Part 2 Section 22) will allow the construction of new developments on detached blocks of flats 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>	Left blank
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	A policy is needed but there are significant aspects missing that need to be included.	1. The policy as now drafted includes the wording on extensions and alterations taking into account the proportions of the

Left blank	<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>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>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 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>
Left blank	<b>The Woodland Trust</b>	Left blank
Left blank	<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 <b>SPD on Home improvements and extensions (December 2019)</b>: <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</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>

Left blank	<p>recommend setting a proposed ratio of tree replacement, which reflects the Woodland Trust guidance on <b>Local Authority Tree Strategies</b> (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 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 <b>Residential developments and trees - the importance of trees and green spaces</b> (January 2019)</p>	Left blank
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	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.
Left blank	<p>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</p>	<p>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.</p>

Left blank	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).	Left blank
Left blank	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.
Left blank	Would wish to see minimum standards referenced.	Minimum space standards are referenced in LPSS policy H1.
Left blank	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.	Without these safeguards a separate dwelling would be created, which would require a different application for a new dwelling house.
Left blank	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.	Height is addressed in Criteria (1) and roof extensions would fall for consideration under part one of this proposed policy as they are an extension/alteration. Density and parking are matters addressed by other policies in the Local Plan.



## Policy H6: Housing conversions and sub-division

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
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</p>	<p>1, 2 &amp; 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 &amp; 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 &amp; 3 a site specific flood risk assessment will be required, which includes the consideration of access and egress.</p>

Left blank	working in areas of flood risk require particularly careful consideration, as they could increase the scale of any evacuation required.	Left blank
Left blank	<b>Historic England</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	<p>We agree with the preferred option but...</p> <ol style="list-style-type: none"> <li>1) The relevant Neighbourhood Plan should be one of the applicable policy documents for all questions</li> <li>2) If the conversion or sub- division increases the likely occupancy then parking provision must be in accordance with the Neighbourhood Plan.</li> </ol>	<ol style="list-style-type: none"> <li>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.</li> <li>2. Parking is addressed in greater detail in LPDMP policy ID11. The Council has added new policy criteria stating that</li> </ol>

Left blank	Left blank	'sufficient amenity space, parking, bin storage and cycle parking is available'.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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'.
Left blank	<b>Cranley Road Area Residents Association</b>	Left blank
Left blank	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.
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	We <b>agree</b> with the aims and requirements of Policy H6 as proposed in the Preferred Option with the below caveats: <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ol>	<ol style="list-style-type: none"> <li>1. The Council has defined 'immediate locality' in the context of this policy.</li> <li>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.</li> <li>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'.</li> </ol>
Left blank	<b>East Horsley Parish Council</b>	Left blank
1 (a)	We agree with the aims and requirements of Policy H6 as proposed in the Preferred Option with one exception:	1. The Council has defined 'immediate locality' in the context of this policy.


Left blank	<p>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.</p> <p><b>SUGGESTIONS</b></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>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, 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>
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	<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>
Left blank	<b>Guildford Residents Association</b>	Left blank
Left blank	<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>

Left blank	Left blank	The Council has defined 'amenity space' in the context of this policy. This issue is explored further in LPDMP policy D5 on amenity.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	<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>
Left blank	<b>Merrow Residents Association</b>	Left blank
Left blank	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.	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'.
Left blank	<b>West Clandon</b>	Left blank
Left blank	The preamble aspires to high quality of design etc and yet this is not mentioned in the policy. There is refence in the preamble to Policy H1(8) in the LPSS which is also silent on design.	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.
Left blank	<b>Worplesdon Parish Council</b>	Left blank

Left blank	Need for sufficient parking, or in certain areas in the Town Centre or by rail stations, car free.	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’.
Left blank	<b>Shalford Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	<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</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>



Left blank	<i>accommodation is limited to one unit, or 1 in 5 units in larger conversions;</i>	Left blank
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	<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><sup>1</sup> <a href="https://www.warwickdc.gov.uk/download/pbsa_consultation_draft.pdf">https://www.warwickdc.gov.uk/download/pbsa_consultation_draft.pdf</a></p> <p><sup>2</sup> <a href="https://www.oxford.gov.uk/info/20113/houses_in_multiple_occupation">https://www.oxford.gov.uk/info/20113/houses_in_multiple_occupation</a></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>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, licencing<sup>1</sup>, review and enforcement are outside the scope of this policy.</p> <p>4. <u>Article 4 directions</u> 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 (<u>PPG Para: 038 Reference ID: 13-038-20190722</u>) 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>

<sup>1</sup> For information, the Council do run a licensing 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>

Left blank	<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>	Left blank
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	<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 <u>Guildford Lettings Accreditation Scheme</u> to help raise standards and promote good landlords, plus an enforcement policy to take action where necessary.</p>
Left blank	<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>
Left blank	<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><u>Article 4 directions</u> 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 (<u>PPG Para: 038 Reference ID: 13-038-20190722</u>)</p>



Left blank	<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'</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.</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>
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## Policy E10: Rural development (including agricultural diversification)

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
Left blank	Agree.	Support for preferred option noted.
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	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.

Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	Compton PC suggests that the wording of this policy be amended so that only <b>small-scale</b> 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 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 paragraphs 149-150 in relation to Green Belt) and in other adopted and emerging Local Plan policies.
Left blank	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.	Agreed – this matter was covered in the preferred approach wording under the paragraph headed ‘Non-agricultural uses within farm holdings’.
Left blank	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.	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 paragraphs 149-150 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.

Left blank	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.	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.
Left blank	<b>Cranley Road Residents' Association</b>	Left blank
Policy E10	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. 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.	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 149 (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.
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	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.	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 paragraphs 149-150 in relation to Green

Left blank	Left blank	Belt) and elsewhere in other adopted and emerging Local Plan policies.
Left blank	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)	This would conflict with paragraph 150 of the July 2021 NPPF (paragraph 146 in the February 2019 NPPF) and the presumption in favour of sustainable development under NPPF paragraph 11.
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	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.	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.
Policy – Countryside (second paragraph)	Please add 'light pollution' to noise in the paragraph starting 'New buildings in the countryside..' under the Countryside heading.	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 paragraphs 149-150 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.	RE9 design criteria are covered under LPSS Policy D1.

Left blank	The Policy needs to comment on transport e.g. even small-scale business enterprises can generate traffic volumes in narrow roads.	Transport and highways issues are covered elsewhere e.g. in Policy ID3 of the LPSS.
Left blank	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>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>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
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 paragraphs 149-150 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.
Left blank	<b>Merrow Residents' Association</b>	Left blank

Left blank	<p>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.</p>	<p>Points on retained policies R6 and R8 covered by new LPDMP policy on sports and recreational facilities.</p>
Left blank	<p>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.</p>	<p>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 149 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.</p>
Left blank	<p>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).”</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. Policy D10: Noise Impacts deals separately with the impact of noise on sensitive receptors, including residents and the natural environment.</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, paragraphs 149-150 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.</p>
Left blank	<p>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</p>	<p>This was adequately covered by the existing wording which states that proposals for non-agricultural uses should support the farm’s agricultural operation.</p>

Left blank	development. This shouldn't become a route to development of a financially unviable farm.	Left blank
Left blank	<b>National Trust</b>	Left blank
Left blank	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.
Left blank	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 paragraphs 149-150 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.
Left blank	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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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	Noted.



Left blank	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.	Left blank
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	<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"> <li>• To limit the size and number of properties which can be built through infilling.</li> <li>• To ensure that any infilling is reflective of the prevailing character and density of the surrounding area.</li> <li>• For limited infilling projects to be in compliance with policies</li> </ul>	<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&amp;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>

Left blank	<p>of the neighbourhood plan policies.</p> <ul style="list-style-type: none"> <li>• For consideration to be provided on the cumulative impact of sequential 'limited infilling' developments on the existing community.</li> </ul>	Left blank
Left blank	<b>Sport England</b>	Left blank
Left blank	<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 paragraphs 149-150 in relation to Green Belt) and elsewhere in other adopted and emerging Local Plan policies.</p>
Left blank	<b>Surrey Hills AONB</b>	Left blank
Left blank	<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>

Left blank	<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 paragraph 84 (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. 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>
Left blank	<b>Surrey Wildlife Trust</b>	Left blank
Left blank	<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>
Left blank	<b>West Clandon Parish Council</b>	Left blank
Left blank	<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</p>

Left blank	Left blank	to the NPPF exceptions under paragraphs 149 and 150, and any sequential test requirements in the case of main town centre uses.
Left blank	The policy should address light pollution as well as noise.	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.
Left blank	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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
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”).
Left blank	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.
Left blank	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.

Left blank	<b>The Woodland Trust</b>	Left blank
Left blank	<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>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>	<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>

### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	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	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

Left blank	panels to complement livestock where the panels are not overly visably obtrusive	to balance considerations such as this when assessing the impact of planning applications.
Preferred Option	Impact on views within to and from the AONB should be included in the Preferred Option Box.	This point is adequately covered by the existing LPSS Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value.
Left blank	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.	We disagree, as to not support such development in principle would be in conflict with paragraph 84 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>
Paragraph 3.3	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.	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.
Paragraph 3.9	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	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.

Left blank	<p>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>	Left blank
Left blank	<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 paragraphs 149-150 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 150 considers the reuse of buildings within the Green Belt as not inappropriate provided they are 'of permanent and substantial construction'.</p>
Left blank	<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>
Left blank	<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 here.....I feel it needs to read as more supportive of our rural businesses and not just the economy of GBC.</p> <p>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>	<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>

## Policy E11: Horse Related Development

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Nature Partnership</b>	Left blank
p.31; para. 3.16	<p><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).</p>	New wording has been added to the policy’s introduction to address this point.

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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) d) 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 changed accordingly in the wording of point 1) e) of the Regulation 19 policy.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	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 150 d)).
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	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.

Left blank	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.	Lighting of external areas has been added to point 1) d).  The issue of manure is related to smell which we feel was adequately covered in paragraph 2) d) of the preferred option policy (renumbered as paragraph 1) d) in the Regulation 19 policy).
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	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.
Left blank	<b>Merrow Residents’ Association</b>	Left blank
Left blank	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.  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	Noted. The BHS and Defra guidance are referenced within the supporting text and footnotes and are given increased material weight in decision-making on planning applications by virtue of inclusion within the policy of the need for equine-related development to comply with the latest Government published guidelines and standards.  The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 were also reviewed but not considered to warrant any amendments to this policy. The obligations that these Regulations impose on

Left blank	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762420/animal-welfare-licensing-hiring-out-horses.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762420/animal-welfare-licensing-hiring-out-horses.pdf</a> . 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.	local authorities and operators of activities requiring a licence are already legal requirements.
Left blank	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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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 statement and transport assessment requirements for larger-scale commercial developments within the proposed policy wording.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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.	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.  The Regulation 18 draft policy E11 had only a single criterion targeted at commercial developments (related to transport assessments). An additional criterion has been

Left blank	Left blank	included to capture a point from policy R13 that was absent in the Regulation 18 draft policy E11.
Left blank	<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>	Policy E11 has been renamed and its scope widened to cover 'Animal Related Development'. The horse specific criteria have been retained separately, with the inclusion of more general criteria related to all animals.
Left blank	<b>West Clandon Parish Council</b>	Left blank
Left blank	The policy should include requirements about light pollution from outdoor arenas and the need for control of rodents.	<p>Lighting of external areas has been added to paragraph 1) d) in the Regulation 19 policy.</p> <p>Rodents and other wild animals are a fact of life in the countryside and cannot be controlled through planning policies.</p>
Left blank	<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>". 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) c)). Additional wording in relation to impact on landscape character has also been incorporated in point 1) a).</p>
Left blank	<b>West Horsley Parish Council</b>	Left blank

Left blank	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 animal-related developments. Unauthorised caravans which require planning permission are dealt with by enforcement rather than planning policy.
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## Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	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.
Left blank	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) e) ensures that adequate land for grazing and exercising for equine animals 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)

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Natural England</b>	Left blank
Left blank	<p>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.</p>	Noted.
Left blank	<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"> <li>• Identifying opportunities for new multi-functional green and blue infrastructure,</li> <li>• Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) and climate resilient,</li> </ul>	<p>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.</p>

Left blank	<ul style="list-style-type: none"> <li>Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape,</li> <li>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,</li> <li>Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore),</li> <li>Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habits.</li> </ul> <p>Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.</p>	Left blank
Left blank	<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> <p>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>	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.
Left blank	<p>Consideration could also be given to whether the plan recognises the role of ecosystems and soils in carbon sequestration.</p>	References have been added to the role of ecosystems and soils in carbon sequestration in the supporting text.
Left blank	<b>Environment Agency</b>	Left blank
Left blank	<p>We welcome this policy which seeks to prioritise biodiversity in all new developments.</p>	Noted.
Left blank	<p>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.</p>	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.

Left blank	<p>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).</p>	<p>The proposed policies will deliver biodiverse developments that improve connectivity between habitats including within urban areas.</p> <p>The Council intends to produce a Green and Blue Infrastructure SPD which will further address ecological connectivity within settlements.</p>
Left blank	<p><i>Green and Blue Infrastructure Supplementary Planning Document (SPD)</i></p> <p>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.
Left blank	<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.</p> <p>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</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>



Left blank	<p>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>	Left blank
Left blank	<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)	<p>Requirement 7 of policy P6 should require developments to control/eradicate invasive species where present, as well as avoiding their spread.</p>	<p>This has been amended to require eradication, or control if not possible, where invasive species are present on development sites.</p>
Policy para 9)	<p><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.</p>	<p>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.</p>

Policy para 10)	<p>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.</p>	<p>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.</p> <p>Text has been added to the supporting text setting out the reasoning provided.</p>
Left blank	<p>Policy P6 should also require developments to enhance watercourses and their riparian corridors where a watercourse flows through or directly adjacent to the site.</p> <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>Adopted policy ID4(7) states “The ecological, landscape and recreational value of watercourses will be protected and enhanced. 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.</p> <p>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>

Left blank	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.	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 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.
Left blank	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.
Left blank	<b>Historic England</b>	Left blank
Left blank	Agree; protection and enhancement of biodiversity very often has direct, as well as incidental, benefits for the historic environment.	Noted.
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	Largely supported. Minor corrections to the supporting text proposed.	Noted. Corrections have been made.

## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Hills AONB Board</b>	Left blank
Left blank	Strongly support.	Noted.

Left blank	<b>Woodland Trust</b>	Left blank
Section 5	<p>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.</p> <p>Further guidance is available in the Trust publication, Emergency Tree Plan for the UK (2020).</p>	<p>A minimum 30% tree cover target would not be achievable in all development (e.g. a town centre regeneration site).</p> <p>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> <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 Surrey<sup>2</sup>.</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>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	<p>Agree with the policy, subject to modifications. Current problems include:</p> <ul style="list-style-type: none"> <li>• Landscaping and gardens are increasingly planted to be low maintenance and to mature rapidly</li> <li>• Inadequate tree planting including on GBC land and SCC highways land</li> <li>• Garden space lost to extensions (particularly single storey extensions which waste space)</li> <li>• Loss of front gardens to hard surfaces</li> </ul> <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 Development and would therefore not be subject to planning policy.</p>

<sup>2</sup> See [https://surreynaturepartnership.files.wordpress.com/2020/03/tree-planting-for-climate-change-mitigation-in-surrey\\_snp-january-2020\\_final.pdf](https://surreynaturepartnership.files.wordpress.com/2020/03/tree-planting-for-climate-change-mitigation-in-surrey_snp-january-2020_final.pdf)

Left blank	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.
Left blank	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.
Left blank	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.
Left blank	<b>Normandy Action Group</b>	Left blank
Left blank	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 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 <b>and protect existing irreplaceable habitats (such as ancient woodland and ancient or veteran trees)</b> ”	The protection of irreplaceable habitats is covered by policy P8/P9. The policy wording reflects the NPPF wording.
Left blank	<b>Weyside Urban Village</b>	Left blank
Left blank	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	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.

Left blank	useful for defined boundaries to be set out as part of any eventual policy or as an Appendix.	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Cranley Road Residents' Association</b>	Left blank
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.
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	The policy needed but the proposed policy is not strong enough. It is essential that robust policies are designed to	This policy focuses on biodiversity provision in new development. Other policies protect existing biodiversity.

Left blank	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.	The new policy references the mitigation hierarchy which prioritises existing biodiversity over new.
Left blank	<b>Guildford Residents’ Association</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Bridge End Farm</b>	Left blank
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	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

Left blank	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.'	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.
Left blank	<b>Merrow Residents' Association</b>	Left blank
Left blank	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.
Left blank	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.	Further detail is provided in the supporting text. The reference to permeable boundaries has been added.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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.	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.
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	Agree with amendment: It should require improvement or recovery of biodiversity including creating environments suitable for reintroduction of lost species.	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 Recovery Strategy (LNRS). It will be down to the body that produces the LNRS (which will be set by the



Left blank	Left blank	Environment Act) to decide which habitats should be targeted in order to restore lost species. 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.
Left blank	<b>East Horsley Parish Council</b>	Left blank
Left blank	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.	Neighbourhood plans are Development Plan Documents (DPD) in their own right and will be read alongside the Local Plan and other DPDs.
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	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.	Neighbourhood plans are Development Plan Documents (DPD) in their own right and will be read alongside the Local Plan and other DPDs. 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 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.
Left blank	<b>Shalford Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Portland Capital</b>	Left blank
Left blank	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	The design part of the policy sets out how biodiversity should be approached in the design and delivery of new developments. It

Left blank	<p>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>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)	<p>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.</p>	<p>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).</p> <p>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.</p>
Left blank	<b>Thames Water</b>	Left blank
Left blank	<p>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.</p>	The two policies have been combined.
Left blank	<b>Hallam Land Management</b>	Left blank

Policy para. 6 a)	<p>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”.</p> <p>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 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>	<p>The reference to prioritising biodiversity has been deleted and the policy now requires developments to maximise biodiversity gains as a general principle.</p>
Left blank	<b>Reach Plc</b>	Left blank
Left blank	<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>
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	<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</p>	<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-arboreal habitat). The use of ‘expect’ indicates that applicants should do so unless they can demonstrate it is not justified.</p>

Left blank	<p>strengthened. This policy needs to be much stronger, specific and more demanding.</p> <ul style="list-style-type: none"> <li>• There is no accountability for delivering, e.g. new tree planting at point 5 is expected to focus on, it should say <b>MUST</b> focus on.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<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>
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	<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 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</p>	<p>The reference to prioritising biodiversity has been deleted and the policy now requires developments to maximise biodiversity gains as a general principle.</p>

Left blank	<p>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>	Left blank
Policy para 2)	<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>
Policy para 5)	<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>
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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) 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.

Para 4.55	[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.	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.  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.
Policy para 9)	Current lighting practices do not follow this concept of 'Dark Skies'.	The majority of lighting does not need planning permission and 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

Paragraph	Main Issue Summary	GBC Response
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	<p>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.</p> <p>This is just an excuse to reduce costs.</p>	<p>With light management wildflowers can be maintained.</p> <p>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 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 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.	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.
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.	The referenced text has not been used in the draft plan. 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.
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.	The plan includes a policy on sustainable drainage that requires designs to follow technical guidance. SuDS designs will be subject to 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 thorough 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	Local volunteer involvement could be arranged through developer pre-application consultation or bespoke engagement. This has been added to the information about community engagement.

Left blank	kick start it would be appropriate ? I acknowledge that it may be best addressed outside the planning policy.	Left blank
4.53 Policy para 2)	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 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).	It is agreed that land outside BOAs can have high biodiversity value. BOAs indicate areas where specific habitat measures will have the greatest biodiversity benefit and do not identify the areas of highest biodiversity value.  Paragraph 3 links development to biodiversity strategies which will indicate the best biodiversity outcomes for all areas, including those outside of BOAs. Developments outside BOAs will be required to achieve net gains in biodiversity using those strategies.  Policy P8/P9 covers important and sensitive habitats and species including on sites outside of BOAs.
4.66	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.  It would be better not to allow offsetting because the big developers will just do it rather than produce biodiverse developments.  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.	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.  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.  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.
Left blank	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.

Left blank	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.
Left blank	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.
Left blank	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.
Left blank	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.	The policies as a whole promote biodiversity generally and do not only support rare species.
Left blank	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.	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.
Left blank	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	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.
Left blank	A large scale map to show the exact boundaries of the BOAs will be needed.	This will be included in the policies map.

Left blank	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	Noise and light impacts are covered by other policies.
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## Policy P7: Biodiversity net gain (incorporated into new Policy P6/P7 Biodiversity in New Developments in the LPDMP)

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
Left blank	Agree	Noted
Left blank	<b>Environment Agency</b>	Left blank
Left blank	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.
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Wildlife Trust</b>	Left blank
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.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.	<p>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.</p> <p>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.</p>
Left blank	<b>Bridge End Farm</b>	Left blank
Left blank	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.
Left blank	<b>Woodland Trust</b>	Left blank

Left blank	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.	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. The plan includes policies on open space and biodiversity in new developments which will promote the greening of urban areas generally.
Left blank	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.	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. 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.
Left blank	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.	Noted. Policy P8/P9 protects irreplaceable habitats including Ancient Woodland.
Left blank	<b>Weyside Urban Village</b>	Left blank
Left blank	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.	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.
Left blank	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	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.

Left blank	an adopted policy at 20% squeezes the viability balance where the land deal is already in place.	Left blank
Left blank	<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.</p> <p>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.</p> <p>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>
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	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.	Agreed. Policies are proposed that protect existing biodiversity and the policy incorporates the mitigation hierarchy, which prioritises avoidance of harm.
Left blank	<b>Homebuilders' Federation</b>	Left blank
Left blank	<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,</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</p>



Left blank	<p>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>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, 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.</p>
Left blank	<p>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.</p>	<p>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.</p>
Left blank	<b>West Clandon Parish Council</b>	Left blank
Policy para 6)	<p>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</p>	<p>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</p>

Left blank	available.” And if not? It cannot be intended that in such cases no payment will be required.	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.
Left blank	<b>Blackwell Park</b>	Left blank
Left blank	<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>
Left blank	<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</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> <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.</p>

Left blank	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.	Left blank
Left blank	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.
Left blank	<b>Thames Water</b>	Left blank
Left blank	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.
Left blank	<b>Shalford Parish Council</b>	Left blank
Left blank	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.
Left blank	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	The Defra Metric provides a method for establishing the baseline. The Environment Bill has not yet passed but it is likely

Left blank	diversity stripping ahead of submission for planning be prevented?	<p>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>
Left blank	<b>Portland Capital</b>	Left blank
Left blank	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.
Left blank	<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 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 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>
Left blank	<b>Ripley Parish Council</b>	Left blank
Left blank	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	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.

Left blank	Gain is clear.	Left blank
Left blank	<b>Hallam Land Management</b>	Left blank
Left blank	<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> <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.</p>
Left blank	<b>Martin Grant Homes</b>	Left blank
Left blank	<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>	<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.</p>
Left blank	<p>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.</p> <p>The pressure on available space within the Borough is reflected in land prices, which will inevitably have a significant bearing on</p>	<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</p>

Left blank	offset costs.	doing so. As a result, the addition of wording “subject to viability” is not considered necessary.
Left blank	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.
Left blank	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”.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Ockham Parish Council</b>	Left blank

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.
Left blank	<b>Taylor Wimpey</b>	Left blank
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)	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: "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" OR "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.	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 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.  The standard proposed in the Environment Bill is "at least" 10 percent, which the policy conforms with.

Left blank	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.	Left blank
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 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.</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 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.</p>
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.	<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.</p>
Left blank	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	The Environment Bill specifies a net gain of “at least” 10%. Stating this in policy would not go beyond national policy.



Left blank	developers), or reference to a percentage figure should be removed altogether and instead state that developments should be guided by National standards.	Left blank
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 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.	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 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).  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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	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.	The policies are followed by a definitions section that defines any terms. Acronyms are defined when first used.
Para 4.73	We are unsure on what these costing are based and should be properly referenced.	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.
Para 4.76	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	The policy has been amended so that any nationally BNG exempt developments are also exempted by the policy (including self builds).

Left blank	to master plan BNG as part of the overall scheme. An Individual building their own home would not necessarily have sufficient space or budget to accommodate this, which is one of the reasons that self build homes are exempt from CIL.	Left blank
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## Other respondents

Paragraph	Main Issue Summary	GBC Response
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.
Policy para	Concern over how recipients of finance for biodiversity	Biodiversity sites used for offsetting will be governed by national

7)	offsetting will be subject to compliance with the objective.	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.
Left blank	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.  It is impossible to have any gain in biodiversity under the current plan, as it will destroy much of the existing biodiversity.	Under the proposed policy, development of LPSS sites will lead to an improvement in biodiversity.  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.
Left blank	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.	The policy implements the mitigation hierarchy which will protect existing biodiversity. The biodiversity policies include protections for important biodiversity features.
Left blank	Detail is needed as to how the policy/net gains would be enforced.	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.
Left blank	Despite the numbers quoted in the text, there must be some anxiety that P6 and P7 will inhibit house building.	The plan will be subject to viability testing to establish any impacts on house building.

## Policy P8: Woodland, trees, hedgerows and irreplaceable habitats (incorporated into new Policy P8/P9 Protecting Important Habitats and Species in the LPDMP)

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	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.
Left blank	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 <a href="https://surreynaturepartnership.org.uk/our-work/">https://surreynaturepartnership.org.uk/our-work/</a> . The document provides guidance on assessing whether habitats should be considered irreplaceable. This guidance has been referenced in the definitions under policy P8/P9.
Left blank	<b>Environment Agency</b>	Left blank
Left blank	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.
Left blank	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 Council. This should include details of how these habitats will be monitored and managed to ensure	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.

Left blank	their continued protection and enhancement.	Left blank
Left blank	<b>Historic England</b>	Left blank
Left blank	Agree. Woodlands, parkland and hedges are often significant components of historic landscape character.	Noted.
Left blank	<b>Surrey Nature Partnership</b>	Left blank
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</u> of 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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Martin Grant Homes</b>	Left blank
Left blank	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	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: <a href="https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management">https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management</a> 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 (excluding the woody species criteria). These criteria are that the hedgerow contains: protected species, endangered, vulnerable or rare

Left blank	<p>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 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>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>
Left blank	<b>Surrey Wildlife Trust</b>	Left blank
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>
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	<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>
Left blank	<b>Woodland Trust</b>	Left blank

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. The policy also states that if a greater buffer is specified by national policy, the greater buffer will apply.
Left blank	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.
Left blank	We would further encourage the specification where possible of UK sourced and grown tree stock for new	Policy P6/P7 places a requirement for native and UK sourced planting.

Left blank	planting, in line with policy P6 above, to support biodiversity and resilience.	Left blank
Left blank	<b>Normandy Action Group</b>	Left blank
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.</p> <p>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. The policy also states that if a greater buffer is specified by national policy, the greater buffer will apply.</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.
Left blank	<b>Weyside Urban Village</b>	Left blank
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>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</p>



Left blank	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 Policy 7 and confirm those habitats that truly are irreplaceable against those that are of very high or high value.	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.
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. The policy also states that if a greater buffer is specified by national policy, the greater buffer will apply.
Left blank	<b>Guildford Residents’ Association</b>	Left blank
Left blank	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: <a href="https://surreynaturepartnership.files.wordpress.com/2020/08/irreplaceable-habitats-guidance-for-surrey_final_aug2020.pdf">https://surreynaturepartnership.files.wordpress.com/2020/08/irreplaceable-habitats-guidance-for-surrey_final_aug2020.pdf</a> However, it has not produced a definitive list. The policy provides for future documents to be published.
Left blank	<b>Compton Parish Council</b>	Left blank
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.

Left blank	Left blank	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. The policy also states that if a greater buffer is specified by national policy, the greater buffer will apply.
Policy para 4)	Roads should not be used to separate ancient woodland from housing development. Building a road adjacent to ancient woodland could have a negative impact on this sensitive environment in terms of noise, air pollution and wildlife.	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)	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.
Left blank	<b>National Trust</b>	Left blank
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.
Left blank	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

Left blank	Left blank	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.
Left blank	<b>Ripley Parish Council</b>	Left blank
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.
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	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	This policy is focused on biodiversity so protects biodiverse hedgerows. The plan contains design policies that cover issues such as boundary treatments and landscaping.

Left blank	the 1997 regulations but are important for greening the built environment.	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. 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.
Left blank	<b>East Horsley Parish Council</b>	Left blank
Left blank	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.	Neighbourhood Plans are development plan documents in their own right and do not need policy support from the Local Plan.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Policy para 4b)	The buffer zone of 15m seems very low.	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.
Left blank	There should be clear guidance if there is the presence of OPM.	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 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.
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	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)	<p>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.</p>	<p>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.</p> <p>The supporting text sets out information about which hedgerows are covered.</p>
Policy para 2)	<p>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”.</p>	<p>This point is agreed. ‘Unequivocal and credible’ has been replaced with ‘robust’, a more commonly used planning term.</p>
Policy para 4c)	<p>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, the text “delineated by a physical feature such as a cycle lane, path or road” should be removed.</p>	<p>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 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</p>

Left blank	Left blank	linkages. As a result, our view is that the benefits of delineation outweigh the possible disbenefits in terms of habitat fragmentation. The policy has been amended to refer to lightly trafficked roads as it is acknowledged that busy roads could lead to fragmentation.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Para 4.93	[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.	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.
Para 4.99	'Important' [hedgerow] in this context needs clear definition, as does the procedure for assessing this matter.	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.
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

Paragraph	Main Issue Summary	GBC Response
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)	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	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

Left blank	<p>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>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)	<p>15 metres is insufficient buffer for ancient woodland. The buffer should be much larger.</p> <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>The minimum 15m proposed buffer is consistent with Natural England's standing advice. The policy states that if a greater buffer is specified by national policy, the greater buffer will apply.</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>
Left blank	<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>

Left blank	The policy is impossible as long as the proposed greenfield development remains in the plan.	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.
Left blank	<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 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"> <li>• Attempts to actively prevent birds from nesting in trees</li> <li>• 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.</li> </ul> <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"> <li>• 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).</li> <li>• Placing a specific embargo on the removing, damaging or otherwise interfering with relevant hedges (or other habitat) around, or on, an actual or prospective</li> </ul>	<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>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>



Left blank	<p>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).</p> <ul style="list-style-type: none"><li>• 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.</li></ul>	Left blank
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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)

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	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.
Left blank	<b>Surrey Nature Partnership</b>	Left blank
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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Wildlife Trust</b>	Left blank

4.106	<p>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>"</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 it is included in a topic paper, the amendment will be made.</p>
Left blank	<p><b>Compton Parish Council</b></p>	Left blank
Left blank	<p>The mitigation hierarchy gives developers "wobble 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>
Left blank	<p><b>Weyside Urban Village</b></p>	Left blank
Left blank	<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. 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. 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 considered on a case-by-</p>

Left blank	Left blank	case basis. The metric would form a starting point for drafting the compensation package.
Left blank	<b>National Trust</b>	Left blank
Left blank	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.
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	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.
Left blank	<b>Effingham Parish Council</b>	Left blank
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.
Left blank	<b>East Horsley Parish Council</b>	Left blank
Left blank	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.

Left blank	<b>Taylor Wimpey</b>	Left blank
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: (...)</p> <p>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. 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)	<p>Part 1 of the policy lists out the priority habitats and species the policy is referring to.</p> <p>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.</p>	<p>Agreed. “Habitats sites” has been removed.</p>
Left blank	<p>It is not clear what “habitat register” is being referred to in part d) of the policy, so this should also be defined.</p>	<p>The reference to “habitats register” refers to the registered habitat sites proposed in the Environment Bill for off site biodiversity net</p>

Left blank	Left blank	gains. These words have been replaced with “biodiversity net gain sites” and are defined in the supporting text.
Left blank	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.
Left blank	<b>Martin Grant Homes</b>	Left blank
Left blank	<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>
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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</p>

Left blank	Left blank	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. 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.
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

Paragraph	Main Issue Summary	GBC Response
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 point in 1) to allow for sites that have high, but currently unrealised, habitat and associated biodiversity potential.	Refusing planning applications on the basis of future biodiversity value (rather than current value) would not be reasonable. However, the protection for ancient woodland takes into account soils that have potential to support ancient woodland habitat.
Left blank	The policy should be to protect all habitats, not just priority habitats.	The plan will protect important biodiversity features and provide net gains for biodiversity. 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.

Left blank	<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>
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## Policy P10: Contaminated Land

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	Policy supported.	Noted.
Left blank	<b>The Environment Agency</b>	Left blank
Left blank	<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

Paragraph	Main Issue Summary/Respondent	GBC Response
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Left blank	<b>Cranleigh Road Area Residents Association</b>	Left blank
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.
Left blank	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'.
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Residents Association</b>	Left blank
Policy	We support the inclusion of such a policy. The wording would benefit from being more definite, as for example:  '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:  a) the full nature and extent of contamination must be established...  b) where evidence of contamination exists, the land must be...  c) appropriate remedial measures are to be included...	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.

Left blank	d) prior to either occupation or use, a 'Verification Report' shall...'	Left blank
Left blank	<b>Taylor Wimpey</b>	Left blank
Policy point (1)	Proposed amendment: "1)...and associated works are to be carried out to industry best practice guidelines <u>at the time of application</u> ,.."	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.
Policy (1) (a)	Proposed amendment: "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> ,.."	Planning conditions will be applied to approved decision notices where appropriate, it is not considered necessary to articulate this within the policy itself.
Left blank	TW support the alternative option which is to not to have a policy on contamination.	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.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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.	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.  The development plan should be read as a whole. Other proposed policies (currently P6/P7 and P8/P9), alongside Policy

Left blank	Left blank	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.
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	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.
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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

Left blank	Left blank	the redevelopment of any potentially contaminated site within the borough.
Left blank	<b>Merrow Residents' Association</b>	Left blank
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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>East Horsley Parish Council</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary	GBC Response
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Left blank	Left blank	Left blank
Left blank	Agree with preferred option. Please make the requirements more definite.	The policy wording has been finalised to improve clarity for the Regulation 19 consultation.
Left blank	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.
Left blank	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

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	Supported.	Noted.
Left blank	<b>Natural England</b>	Left blank
Left blank	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>
Left blank	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	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

Left blank	and Natural England's detailed advice on the procedure for air quality assessment.	effect of other approved developments and site allocations, to have significant adverse impacts on air quality. 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.
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## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Guildford Residents Association</b>	Left blank
Left blank	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: '1) Is designed to minimise the potential adverse impact of development on health and quality of life from air pollution.'	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.  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.  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.
Left blank	<b>Cranleigh Road Area Residents Association</b>	Left blank



Left blank	The policy should give more attention to cumulative effects and require assessment of impact on air quality at peak times including congestion.	<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>
Left blank	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>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>
Left blank	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.	This Criterion has been removed from the policy.
Left blank	<b>The Guildford Society</b>	Left blank
Left blank	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>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</p>

Left blank	Left blank	<p>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>
Left blank	<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"> <li>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).</li> <li>d) the proposed development would be likely to result in the increase of pollution levels within an Air Quality Management Area (AQMA).</li> </ul>
Left blank	<b>Taylor Wimpey</b>	Left blank
Policy P11 (1)	<p>Suggested amendment to improve clarity:</p> <p>“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”.</p>	<p>The policy wording has been redrafted in order to make reference to significant adverse impacts. This represents industry best practice and is sufficiently clear.</p>
Policy P11 (4)	<p>“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:</p> <p>“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”.</p>	<p>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.</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</p>

Left blank	Left blank	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.
Left blank	<b>Savills</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Vision Group</b>	Left blank
Left blank	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.
Left blank	<b>The Woodland Trust</b>	Left blank
Left blank	Trees and hedgerows can improve air quality by absorbing pollutants, for example, by planting trees to shield school playgrounds, and should be considered as part of any mitigation strategy.	Noted. Criteria (4) requires that, where an Air Quality Assessment identifies the potential for significant adverse 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:	Criteria (2) now requires that development must not result in significant adverse impacts on sensitive receptors, including

Left blank	1) Will only permit development where it will not give rise to adverse impacts on health, amenity, or the natural environment from air pollution.	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)	<p>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.</p> <p>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.</p>	<p>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>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.</p>
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	<p>Agree, but would like to add to the policy:</p> <ol style="list-style-type: none"> <li>1. Minimising the impact of traffic congestion in high pollution areas</li> <li>2. Providing facilities for low-pollution transport,</li> <li>3. Controlling dust and emissions from industrial, farming, construction and demolition operations</li> </ol>	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. 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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	This is obviously an area of significant concern in our Borough. There should clearly be more AQMAs.	The designation of AQMAs is outside the scope of the policy.
Left blank	What are the levels around the Borough? It would be helpful to publish a table of levels and encourage additional monitoring.	GBC Regulatory Services are responsible for the collection and publication of data. It is outside the scope of this policy.

Left blank	There is no guidance provided as to how developers will be expected to ensure that air quality is improved.	<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>
Left blank	<b>Shalford Parish Council</b>	Left blank
Left blank	Define "adjacent to"?	This has been removed from the policy.
Left blank	Tree protection and planting should be implemented within AQMA's to reduce pollution.	<p>Strategy for addressing air quality within AQMAs is developed by GBC's Regulatory Services. The relevant Air Quality Action 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>

Left blank	Left blank	Criteria (5) also states that proposed avoidance and mitigation measures are expected to be designed to maximise their ecological and aesthetic value.
Left blank	How will the effects of development which leads to increased traffic to the area be managed and mitigated?	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.
Left blank	<b>Reach Plc</b>	Left blank
Left blank	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.
Left blank	<b>Merrow Residents Association</b>	Left blank
Left blank	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.
Left blank	<b>Ripley Parish Council</b>	Left blank

Left blank	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.
Left blank	<b>Compton Parish Council</b>	Left blank
Policy P11 (1)	Proposed amendment: “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”.	Policy wording has been added in order to strengthen the protection of Air Quality Management Areas: Criteria (3)(c) and (d) require that an Air Quality Assessment is submitted where:  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).  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.
Left blank	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	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

Left blank	area should therefore include the accumulative impact of pollution from traffic on existing AQMA's and borderline areas.	significant adverse impacts on sensitive receptors from any source of emissions to air.
Left blank	We would also like to see the re-establishment of a permanent air quality monitoring station.	This is outside the scope of this policy.
Left blank	<b>Ockham Parish Council</b>	Left blank
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>
Left blank	<b>West Clandon Parish Council</b>	Left blank
Left blank	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 (AQMA's) 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>'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>



Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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

Paragraph	Main Issue Summary	GBC Response
Left blank	Agree with preferred option. There should be an air quality action plan covering the whole borough.	This is outside the scope of the policy.
Left blank	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.
Left blank	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.

Left blank	<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>
Left blank	<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

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Nature Partnership</b>	Left blank
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.
Left blank	<b>The Environment Agency</b>	Left blank
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.
Left blank	Recommended that a separate policy on watercourses and their riparian corridors is included. This will help to protect and enhance the ecological value of watercourses, in addition to the quality and quantity of water resources, which is covered in Policy P12.	The model policy provided by the Environment Agency has been used as the basis for a new policy, which has then been combined with the water quality policy. The protects and enhances the ecological value, quality and quantity of watercourses as well as other waterbodies.

Left blank	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.
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>The Woodland Trust</b>	Left blank
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.
Left blank	<b>Cranleigh Road Area Residents Association</b>	Left blank
Left blank	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.

Left blank	Left blank	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.
Left blank	<b>Guildford Residents Association</b>	Left blank
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.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	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.
Left blank	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: 3) Requires new development that is likely to have a <u>material</u> or <u>severe</u> impact on underground or surface water bodies	The revised policy sets out more clearly the requirements placed on developments that could adversely impact waterbodies. 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

Left blank	covered by the Water Framework Directive and the <a href="#">South East Thames</a> River Basin Management Plan....”	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. 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.
Left blank	<b>Merrow Residents Association</b>	Left blank
Left blank	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.	Water efficiency measures, including rainwater harvesting, are covered in adopted policy D2 and proposed policies D12 and P13.
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	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: a) the flow or quantity of groundwater; and b) the quality of surface or groundwater resources.	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).
Left blank	<b>Ripley Parish Council</b>	Left blank
Left blank	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 adversely affected by the introduction of large new developments nearby.	Proposed policy P13 and existing policy P4 address the issue of flooding. The policies require development not to exacerbate existing problems.
Left blank	<b>Shalford Parish Council</b>	Left blank
Left blank	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.

Left blank	<b>Portland Capital</b>	Left blank
Left blank	<p>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.</p>	<p>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.</p> <p>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.</p>
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	<p>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.</p>	<p>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.</p>
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	<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>
Left blank	<b>Thames Water</b>	Left blank

Left blank	<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>
Left blank	<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 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>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>

**Other respondents**

Paragraph	Main Issue Summary	GBC Response
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Left blank	<p>Agree with preferred option.</p> <p>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>
Left blank	<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

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	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>
Left blank	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.
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	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.

Left blank	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.
Left blank	<b>The Environment Agency</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	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 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	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: <ul style="list-style-type: none"> <li>• it will not result in pollution of groundwater</li> <li>• there are clear and overriding reasons why the discharge cannot reasonably be made indirectly, and</li> <li>• there is adequate evidence to show that the increased pollution risk from direct inputs will be mitigated</li> </ul>

Left blank	infiltration systems is addressed in the policy P13.	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Weyside Urban Village</b>	Left blank
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.
Left blank	<b>Cranleigh Road Area Residents Association</b>	Left blank
Left blank	<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> 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.	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.

Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	SuDS should <b>always</b> 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>
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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, 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</p>

Left blank	Left blank	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.
Left blank	<b>Shalford Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Merrow Residents Association</b>	Left blank
Left blank	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.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	<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 Council does not have the relevant expertise, the policy does not require or encourage the use of SuDS on these developments.</p>

Left blank	Left blank	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.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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.	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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	Recommended additions: 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.	The SuDS sustainability hierarchy produced by the LLFA has been included. 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.
Left blank	<b>Ripley Parish Council</b>	Left blank
Paragraphs 4.140 – 4.141	As per paras 4.140-4.141, the robustness of systems in areas surrounding proposed large new developments needs to be inspected.	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.
Left blank	<b>Thames Water</b>	Left blank
Left blank	It is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It	The policy includes a discharge hierarchy which places discharge to combined sewer as the least favourable option and

Left blank	<p>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.</p> <p>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.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the new Local Plan:</p> <p><b><i>“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.”</i></b></p>	<p>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.</p> <p>The proposed text has not been included as the supporting text sufficiently covers this point.</p>
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## Policy P14: Regionally Important Geological/Geomorphological Sites

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	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
Left blank	<b>Historic England</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	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.
Left blank	<b>Normandy Action Group</b>	Left blank
Left blank	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	Policy P14 protects designated Regionally Important Geological/Geomorphological Sites. The protection of AGLV is outside the scope of the policy.

Left blank	<p>Geomorphological: “of or relating to the form or surface features of the earth”).</p> <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. We propose a new paragraph in the Issues section of Policy P14 as follows in order to maintain protection for AGLV designated land:</p> <p>“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>AGLV is a landscape designation. While it is acknowledged that landscape has a relationship with geomorphological features, the protection of landscape is not the purpose of the preferred option. 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>
Left blank	<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>
Left blank	<b>Guildford Society</b>	Left blank

Policy Para 1)	Agree however in (1) the reference to biodiversity looks odd: these are geological sites.	The reference to biodiversity has been changed to “conservation interests”.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary	GBC Response
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”.
Left blank	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

Left blank	Left blank	to impacts on “conservation interests” in new Policy P14. The new policy is consistent with the biodiversity policies.
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## Policy D4: Achieving high quality design and local distinctiveness

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Guildford Society</b>	Left blank
Left blank	<ol style="list-style-type: none"> <li>1. Policy should reference the use of the South East Design Panel</li> <li>2. Needs considerable strengthening on matters of consultation and links to Neighbourhood plans</li> <li>3. Consideration of the forthcoming Building Better Building Beautiful Commission report when released if timing allows</li> <li>4. Blanket policy G5 of the 2003 plan should be included in the LPDMP</li> <li>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)</li> </ol>	<ol style="list-style-type: none"> <li>1. LPSS Policy D1 references the use of Design Review Panel</li> <li>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.</li> <li>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.</li> <li>4. The content is considered to be covered by the suite of policies included in the LPSS and the emerging LPDMP.</li> </ol>

Left blank	Left blank	<p>These policies have also been prepared in accordance with the NPPF and National Design Guide.</p> <p>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 must be considered together on a case by case basis. In relation to density – appropriate density is an outcome of designed 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"> <li>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</li> <li>2. Not clear how smaller sites are covered by this element of the policy</li> </ol>	<ol style="list-style-type: none"> <li>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.</li> </ol>

Left blank	Left blank	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.
Left blank	Incorporate more ambitious standards to ensure mass, scale and basic amenity are incorporated, suggestions made include <ul style="list-style-type: none"> <li>• Private internal space</li> <li>• Private outside space</li> <li>• Spatial quality</li> <li>• Aspect and outlook</li> <li>• Spacing</li> <li>• Mass as part of views</li> <li>• Sustainable design</li> <li>• Height</li> </ul>	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.
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	<b>Supports alternative option of being assessed against Local Plan Strategy &amp; Sites 2019, NPPF, National Design Guide and PPG and where relevant the Strategic Design Codes</b> <ol style="list-style-type: none"> <li>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.</li> <li>2. Questions over duplicity with Policy D1 and the SDF SDP and consider that this policy should not be applicable to strategic sites</li> </ol>	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.
General Principle (4)	Consider this is already addressed in Policy D1 & SDF SPD with the suggestion that it is removed and added to the supporting text.	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.
Left blank	<b>Bridge End Farm</b>	Left blank

General Principle (4)	Consider this is already addressed in Policy D1 & SDF SDP with the suggestion that it is not appropriate or necessary for inclusion	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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	Concerns about the cumulative impact of incremental development – Suggestions made: <ul style="list-style-type: none"> <li>• 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</li> <li>• embodied energy to be considered in a quantitative way and must be related to a stated design life of the building</li> </ul>	Each planning application must be assessed on its own merits. Embodied carbon is addressed in emerging Policy D12.
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	<ol style="list-style-type: none"> <li>1. Policy needs to ensure that the full spec provided in the 2003 policy is carried forward into the new ones</li> <li>2. Reference to Neighbourhood Plans, the existing built form and consideration of space around buildings</li> </ol>	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol>
Left blank	<b>Weyside Urban Village</b>	Left blank
Left blank	<ol style="list-style-type: none"> <li>1. High quality design can respect local character without necessarily directly reflecting it</li> <li>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</li> </ol>	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</i>



Left blank	Left blank	<p><i>not always be desirable to reflect locally distinct patterns of development. These sites must 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)
Left blank	<b>The Woodland Trust</b>	Left blank
Left blank	<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"> <li>1. Incorporation of existing trees, hedgerows and other important natural features (5h)</li> <li>2. Make a positive contribution to the natural environment (6d)</li> <li>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)</li> </ol>	These aspects are all covered by the emerging biodiversity policies. The plan needs to be read as a whole.
Left blank	<b>Martin Grant Homes</b>	Left blank

Left blank	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.
Left blank	<b>Hallam Land Management Ltd</b>	Left blank
Left blank	<ol style="list-style-type: none"> <li>1. Questions the need for further Development Management Policy concerning design in the case of the Strategic Sites given the existence of the SPD</li> <li>2. Suggests recognition in the supporting text of this fact</li> </ol>	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.
Left blank	<b>Cranley Road Area Residents Association</b>	Left blank
Left blank	<ol style="list-style-type: none"> <li>1. Policy should specify green approaches along transport routes and edge of settlement</li> <li>2. The following should be captured in the policy <ul style="list-style-type: none"> <li>• Spacing between buildings to allow for green features</li> <li>• Management of building heights to respect topography and views</li> </ul> </li> </ol>	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 (7e)	<ol style="list-style-type: none"> <li>1. Should also refer to the importance of views into and out from settlements more general</li> </ol>	The policy requires that development proposals demonstrate a clear understanding of, and respond positively to, issues such as significant views, and surrounding landscape and

Left blank	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.
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	<ol style="list-style-type: none"> <li>1. Recommend specific mention of Nationally Described Space Standards as a way of dealing with minimum space requirements</li> <li>2. Reference to Neighbourhood Plans &amp; Council Landscape and Townscape Character Assessments as relevant considerations</li> </ol>	<ol style="list-style-type: none"> <li>1. This is already required as part of LPSS Policy H1</li> <li>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.</li> </ol>
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
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	<ol style="list-style-type: none"> <li>1. Needs to ensure that the full spec provided in the 2003 policies is carried forward into these new ones.</li> <li>2. Reference to the existing build form and consideration to space around buildings</li> </ol>	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol>
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.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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)
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	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.
Left blank	<b>Merrow Residents' Association</b>	Left blank
Left blank	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.
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	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

Left blank	Left blank	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.
Left blank	<b>Portland Capital</b>	Left blank
Left blank	<ol style="list-style-type: none"> <li>1. Encourage uplift in densities in appropriate locations by recognising minimum density ranges</li> <li>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.</li> <li>3. Policy is conflicting in that it seeks to ensure development respects and responds to history of place and surrounding context while also encouraging sites to consider the opportunity to create site specific identities</li> <li>4. Policy should include greater flexibility to allow development of higher densities to come forward in appropriate locations and not preclude appropriate innovation</li> </ol>	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>3. The policy has been amended to say that 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.</li> <li>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.</li> </ol>
Left blank	<b>Reach Plc</b>	Left blank

Left blank	<ol style="list-style-type: none"> <li>1. Approach needs to balance achieving high quality design and delivering schemes which are viable thus a need for flexibility</li> <li>2. Suggestion that the general principles should be applied, subject to site and development specific issues</li> <li>3. Principles such as form scale and massing should be considered and applied in the round</li> </ol>	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.
Left blank	<b>East Horsley Parish Council</b>	Left blank
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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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	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.
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Downsedge Residents' Association</b>	Left blank
Left blank	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

Left blank	Left blank	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.
Left blank	<b>Sport England</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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.

Left blank	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.
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	LPDMP should contain minimum technical housing standards as an appendix.	LPSS Policy H1 already requires that developments meet the minimum space standards.



## Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	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.
Left blank	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.
Left blank	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.

Left blank	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.
Left blank	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"> <li>• explain the design principles and concepts that have been applied to the development;</li> <li>• demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account</li> </ul>

## Policy D5: Privacy and Amenity

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.
Left blank	<b>Taylor Wimpey</b>	Left blank
(2)	<p>Suggested amendment:            2) ensure developments <u>encourage private, semi-private and public outdoor amenity space</u>". <del>maximise opportunities for provision of private outdoor amenity space,</del></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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	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.
Left blank	<b>Send Parish Council</b>	Left blank

Left blank	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Needs reference to respecting and protecting dark skies.</li> <li>• Boundary treatments should reflect the local character and blend in with the existing landscape setting.</li> </ul>	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.
Left blank	<b>Savills obo Weyside Urban Village</b>	Left blank
Left blank	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.
Left blank	<b>Cranley Road Area Residents Association</b>	Left blank
Left blank	Should refer to development being sensitive to established building lines	This matter is addressed in emerging Policy D4.
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	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. However, it is acknowledged that further guidance and standards may be forthcoming, particularly at a local or neighbourhood scale. In this regard, the policy notes that development proposals are required to have regard to relevant national and local design

Left blank	Left blank	guidance or codes, including in relation to garden sizes and residential separation distances.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Needs reference to respecting and protecting dark skies.</li> <li>• Boundary treatments should reflect the local character and blend in with the existing landscape setting.</li> </ul>	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.
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	Must include the Neighbourhood Plan off-street parking space requirements (which are concerned with the amenity value for neighbours).	<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>
Left blank	<b>Merrow Residents' Association</b>	Left blank
Left blank	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.

Left blank	Left blank	However, it is acknowledged that further guidance and standards may be forthcoming, particularly at a local or neighbourhood scale. In this regard, the policy notes that development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential separation distances.
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Needs reference to respecting and protecting dark skies.</li> <li>• Boundary treatments should reflect the local character and blend in with the existing landscape setting.</li> </ul>	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.
Left blank	<b>Guildford Vision Group</b>	Left blank
Left blank	Question whether elements listed in 3) of 'factors to be considered', sit appropriately alongside the Air Quality Policy?	These factors can have an impact on people's amenity which is separate to the issue of air quality.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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.	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.
Left blank	Need to set minimum standards for amenity space as Waverley has done - minimum of 20 square metres to be	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

Left blank	provided per dwelling, or in the case where a private balcony is provided then this can be reduced to 15 square metres.	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. However, it is acknowledged that further guidance and standards may be forthcoming, particularly at a local or neighbourhood scale. In this regard, the policy notes that development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential separation distances.
Left blank	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.
Left blank	<b>Cllr Ruth Brothwell</b>	Left blank
Left blank	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. However, it is acknowledged that further guidance and standards may be forthcoming, particularly at a local or neighbourhood scale. In this regard, the policy notes that development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential separation distances.

Left blank	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.
Left blank	<b>Downsedge Residents' Association</b>	Left blank
Left blank	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. However, it is acknowledged that further guidance and standards may be forthcoming, particularly at a local or neighbourhood scale. In this regard, the policy notes that development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential separation distances.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>East Horsley Parish Council</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary	GBC Response
Left blank	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. However, it is acknowledged that further guidance and standards may be forthcoming, particularly at a local or neighbourhood scale. In this regard, the policy notes that development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential separation distances.
Left blank	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.
Left blank	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.

## Policy D6: Shopfront Design

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Cranley Road Area Residents Association</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Society</b>	Left blank

Left blank	The 2003 Policy G7 has a clause on respect for local character, this is missing from the new Policy.	<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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
Left blank	There should be a reference to the GBC Guidance on Shopfront Design and Security in Historic areas.	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.
Left blank	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>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"> <li>• Are expected to use high quality materials; and</li> <li>• 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</li> </ul>

Left blank	Left blank	<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>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	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.	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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	Policy should refer to the need to respond to local character and setting and respect the character and style of the existing building	<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"> <li>• 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.</li> <li>• 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.</li> </ul>

Left blank	Left blank	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	Need a coherent style or options guide which over-rides each shop or companies desire for their own standard	<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"> <li>• Design being responsive to the architectural form and design of the host building and wider street setting</li> <li>• Setting out the key architectural components for good shopfront design</li> <li>• Ensuring that features and details of historic or architectural interest are retained</li> </ul>
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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>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>

Left blank	Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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.
Left blank	<b>Worplesdon Parish Council</b>	Left blank
Left blank	Needs to include lighting and control of lighting.	The policy makes reference to security lighting, however advertisement illumination is covered in proposed policy D7.
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	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.	<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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>

Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary	GBC Response
Left blank	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.
Left blank	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.
Left blank	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.

Left blank	2003 Policy G7 has a clause on respect for local character, this is missing from the new Policy.	<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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
Left blank	There should be a reference to the GBC Guidance on Shopfront Design and Security in Historic areas.	<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

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
Left blank	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>The authority already has supporting guidance on this topic - GBC Design Guidance for Advertisement and Signs.</p> <p><a href="https://www.guildford.gov.uk/media/4481/SPG-Adverts-and-Signs/pdf/Adverts_and_signs_SPG_230404.pdf?m=636063567589930000">https://www.guildford.gov.uk/media/4481/SPG-Adverts-and-Signs/pdf/Adverts_and_signs_SPG_230404.pdf?m=636063567589930000</a></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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Theatres Trust</b>	Left blank
Left blank	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.	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.
Left blank	<b>Cranley Road Residents' Association</b>	Left blank

Left blank	It is helpful to provide size limits for projecting signs for locations where these are potentially appropriate. This provides a level playing field.	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.
Left blank	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>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 reasons why it was deemed not appropriate to include reference to vinyl window stickers in this policy are:</p> <ul style="list-style-type: none"> <li>• Not all can be defined as advertisement – e.g. blocked coloured vinyl's.</li> <li>• If they are internally applied then they do not require advertisement consent.</li> </ul> <p>Nevertheless, detailed reference to this form of advertisement could be picked up by way of a revision to the SPD.</p>
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.

Left blank	<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"> <li>• Not all can be defined as advertisement – e.g. blocked coloured vinyl's.</li> <li>• If they are internally applied then they do not require advertisement consent.</li> </ul> <p>Nevertheless, detailed reference to this form of advertisement could be picked up by way of a revision to the SPD.</p>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	The policy should include conformance to the associated detail SPG/SPD	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

Left blank	Left blank	not preclude an SPD being produced nor lessen the weight that can be applied to it.
Left blank	A-boards to be banned, at least in the Town Centre CA, and "TO LET" projecting boards. (Other LAs have done this).	<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"> <li>1. Advertisement excluded from the planning authority's direct control</li> <li>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</li> <li>3. Advertisement for which the planning authority's 'expressed consent' is always needed</li> </ol> <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"> <li>• Notice, sign advertisement must be at ground level</li> <li>• Total area for all forecourt advertising must not exceed 4.6 square metres on each forecourt frontage to the premises</li> <li>• It must not be illuminated</li> </ul> <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>

Left blank	Left blank	<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> <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"><li>• 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.</li><li>• If two boards are joined together to form a single advertisement, a total surface area of 2.3 square metres is permitted.</li><li>• 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</li><li>• No advertisement board is allowed to extend outwards from the wall of a building by more than 1 metre.</li><li>• 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.</li></ul>
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Left blank	Banners across the High Street should also be banned except possibly for minimal limited periods to advertise public (not commercial) functions.	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.
Left blank	Limit extent to which shop windows and building site hoardings can be used for advertisements.	<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"> <li>1. Advertisement excluded from the planning authority's direct control</li> <li>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</li> <li>3. Advertisement for which the planning authority's 'expressed consent' is always needed</li> </ol> <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"> <li>• Have any letters, figures, symbols or similar features in the design over 0.75m in height</li> <li>• Have its highest part at more than 4.6m above ground-level</li> </ul>

Left blank	Left blank	<ul style="list-style-type: none"> <li>• Have its highest part above the level of the bottom of the 1<sup>st</sup> floor window in the wall where the advertisement is</li> <li>• Be illuminated, unless the illumination is intended to indicate that medical or similar services or supplies are available at the premises</li> </ul> <p>There is an additional criterion, specifically for shops which states</p> <ul style="list-style-type: none"> <li>• The advertisement may be displayed only on an external wall which has a shop window in it</li> </ul> <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"> <li>• They are illuminated (for example, a sign hanging internally within the shop window)</li> <li>• The building is mainly used to display advertisement; or</li> <li>• The advertisement is within 1m of any window or other external opening through which it can be seen from outside the building.</li> </ul> <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"> <li>• Be more than 38 square metres in area</li> <li>• Be more than 4.6 metres above ground level</li> </ul>
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Left blank	Left blank	<ul style="list-style-type: none"> <li>• Be displayed more than 3 months before building or construction work commences</li> </ul> <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>
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	Does not support the introduction of any illuminated or neon shop-fronts or signs in the historic section of the High Street.	<p>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 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"> <li>• that illuminated advertisement must not have a detrimental impact on the amenity of adjoining properties and wildlife habitats</li> <li>• that proposals will only be supported where there is no detriment to amenity by reason of method &amp; degree of illumination/luminance (amongst other things)</li> </ul>



Left blank	Left blank	<ul style="list-style-type: none"> <li>designs are responsive to, or enhance the appearance, character and vitality of an area by having regard to level &amp; method of illumination (amongst other things)</li> <li>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</li> </ul> <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
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Policy para (3)	Presumption against proposals for internally and/or externally illuminated fascias and hanging signs in Guildford High Street should be applicable to other 'main' shopping centres.	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 change the policy can be applied to all forms of illuminated advertisements that require advertisement consent.
Left blank	<b>British Sign and Graphics Association</b>	Left blank
Left blank	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.	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:

Left blank	<p>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.</p>	<ul style="list-style-type: none"> <li>• set a clear rational and consistent approach to the provision of advertisement</li> <li>• to set parameters to ensure that the quality and character of a place does not suffer</li> </ul>
Policy para (1)	<p>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-lit and illumination, per se, cannot be said to be out of place.</p>	<p>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> <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"> <li>• that proposals will only be supported where there is no detriment to amenity by reason of design, size, colour, position, materials, amount, type &amp; scale of text, cumulative clutter &amp; method &amp; degree of illumination/luminance</li> <li>• designs are responsive to, or enhance the appearance, character and vitality of an area by having regard to designs are responsive to, or enhance the appearance, character and vitality of an area by having regard to level &amp; method of illumination</li> <li>• signage is integrally designed to respect the entire elevation and proportions of the building, taking account of any architectural features and detailing.</li> </ul>

Left blank	Left blank	<ul style="list-style-type: none"> <li>proposals that would result in harm, to or concealment of architectural features and detailing of historic or architectural significance will not be supported</li> <li>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</li> </ul> <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 (1), (2) and (3)	<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"> <li>that proposals will only be supported where there is no detriment to amenity by reason of design, size, colour, position, materials, amount, type &amp; scale of text, cumulative clutter &amp; method &amp; degree of illumination/luminance</li> <li>designs are responsive to, or enhance the appearance, character and vitality of an area by having regard to designs are responsive to, or enhance the appearance, character and vitality of an area by having regard to level &amp; method of illumination</li> </ul>

Left blank	Left blank	<ul style="list-style-type: none"> <li>• signage is integrally designed to respect the entire elevation and proportions of the building, taking account of any architectural features and detailing.</li> <li>• proposals that would result in harm, to or concealment of architectural features and detailing of historic or architectural significance will not be supported</li> <li>• 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</li> </ul> <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)	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>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.</p> <p>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>
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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.	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

Paragraph	Main Issue Summary	GBC Response
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	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

Left blank	Left blank	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?	<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"> <li>1. Advertisement excluded from the planning authority's direct control</li> <li>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</li> <li>3. Advertisement for which the planning authority's 'expressed consent' is always needed</li> </ol> <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"> <li>• Notice, sign advertisement must be at ground level</li> <li>• Total area for all forecourt advertising must not exceed 4.6 square metres on each forecourt frontage to the premises</li> <li>• It must not be illuminated</li> </ul> <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>

Left blank	Left blank	Given all the above we conclude that a ban on A-boards would be futile and would be overstepping the regulations.
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## Policy D8: Public Realm

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Cranley Road Residents' Association</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Compton Parish Council</b>	Left blank



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.
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	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.
Left blank	<b>Merrow Resident's Association</b>	Left blank
Left blank	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.
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	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.
Left blank	(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.
Left blank	(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.
Left blank	<b>Woodland Trust</b>	Left blank

Left blank	<p>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, 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 “(3) incorporate existing trees, green space and other important natural features to enhance the overall environmental quality for people and nature.”</p>	The policy has been amended to include a requirement for trees and other planting to be incorporated.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	There is a 1995 SPG on Street Cafes but it needs updating: the new Policy D8 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.
Left blank	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.	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>
Left blank	A statement on the desirability of having greenery and planting in the public realm?	The policy has been amended to include a requirement for trees and other planting to be incorporated.
Left blank	We are puzzled to the reference to charging points – as this whole policy appears focussed on the provision of car free areas.	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.
Left blank	<b>Weyside Urban Village</b>	Left blank
Left blank	The general principles within Policy D8 could be expanded to provide further measures to help a space to be a local	The policy has been amended to include a requirement for maximising opportunities for activity and enjoyment, and

Left blank	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 to be included in the design of public open space for visual aesthetic as well as encouraging biodiversity.	encouraging interaction and community cohesion. Tree planting for shading/cooling and biodiversity is addressed by emerging policies D13 and P6.
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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
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.
Left blank	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.
Left blank	<b>Guildford Vision Group</b>	Left blank
Left blank	Ignores the potential of the riverside through the town as a vibrant area of public realm. While many elements come	LPSS Policy S3 seeks to deliver an attractive and safe public realm and improved access and views to the river Wey.

Left blank	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 comprehensively and sensitively exploited as attractive public realm. It should not be used for surface car parking.	Emerging Policy D11 seeks to enhance the public realm value of the river and encourage greater access to it.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary	GBC Response
Left blank	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.
Left blank	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.
Left blank	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.

## Policy D9: Residential Intensification

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Highways England</b>	Left blank
Left blank	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).
Left blank	<b>Historic England</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Guildford Residents' Association</b>	Left blank
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.
Left blank	<b>Woodland Trust</b>	Left blank
Left blank	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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank

Left blank	<p>“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.</p>	<p>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 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>
Left blank	<p><b>Merrow Resident’s Association</b></p>	Left blank
Left blank	<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>



Left blank	The policy should also specify that buildings must be in keeping with their setting and do not harm views to and from an AONB.	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 quality design and local distinctiveness references landscape and views so it is considered unnecessary to repeat in this policy.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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.
Left blank	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>

Left blank	Left blank	<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 pattern of roads, paths, spaces and buildings, urban grain, plot sizes, building patterns, rhythms and lines.</p>
Left blank	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.	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.
Left blank	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.	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.
Left blank	<b>Compton Parish Council</b>	Left blank
Policy para 1(c)	Too vague. How “long” and “narrow” must the access points be?	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.

Policy para 1(f)	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 according to how many houses/facilities are built on a particular site.	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 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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Cllr Brothwell</b>	Left blank
Left blank	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 metrageage.	Each application will be determined on its own merits and each site’s characteristics will vary.

Left blank	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.
Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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</p>

Left blank	Left blank	including in relation to layout – settlement 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.
Left blank	<b>Downsedge Residents' Association</b>	Left blank
Left blank	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 and reinforce locally distinct patterns of development, including landscape setting.</p>

Left blank	Left blank	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.
Left blank	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.	Proposed policy D9 includes a requirement for incorporation of landscaping measures. 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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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.	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.
Left blank	<b>West Clandon Parish Council</b>	Left blank
Left blank	Need clarification that this policy is not applicable in villages still washed over by the Green Belt where limiting infilling can occur	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 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

Left blank	Left blank	regarding distinguishing this policy from Green Belt policy and the different tests that apply.
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## Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	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.
Left blank	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.

Left blank	Left blank	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

### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Sport England</b>	Left blank
Left blank	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.
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank

Left blank	<p>There is an increasing problem of noise-spillage from pub outdoor-spaces, which are often adjacent to residential developments.</p> <p>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"> <li>• No increase in noisy activities or noise spillage will be allowed for established enterprises that adjoin or are close to established residential areas.</li> <li>• New “noise generating” activities must be separated from residential areas.</li> </ul>	<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>
Left blank	<b>Guildford Borough Council Regulatory Services</b>	Left blank
Left blank	<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 any Observable Adverse Effects can be prevented, avoided or mitigates as set out in the policy, the application will be refused.</p>

Left blank	<b>The Theatres Trust</b>	Left blank
Left blank	<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) <b>*must*</b> consider their proximity to noise-generating uses. Applications for noise generating uses (should) <b>*must*</b> also consider their proximity to noise-sensitive uses.</p> <p>(Where appropriate) <b>*Where development would potentially impact on existing uses,*</b> applications (should) <b>*must*</b> 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) <b>*will*</b> 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>
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	<p>Reference could be included on the impact of noise on wildlife and the local environment.</p>	<p>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.</p> <p>The definition of 'sensitive receptor' provided in the supporting text also clarifies that this includes wildlife and the natural environment:</p>

Left blank	Left blank	<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.
Left blank	<b>Guildford Vision Group</b>	Left blank
Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Shalford Parish Council</b>	Left blank
Left blank	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.

Left blank	Left blank	Through this process, the proposed development could be determined as appropriate or otherwise. The policy cannot be applied retrospectively to existing development.
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
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.
Left blank	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.	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.

## Policy D11: Corridor of the River Wey ad Guildford and Godalming Navigation

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	Support	Noted
Left blank	<b>Environment Agency</b>	Left blank
Left blank	<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"> <li>• the removal of barriers and impounding structures</li> <li>• the installation of fish passes (where it is not possible to remove barriers)</li> <li>• improvements to floodplain connectivity and restoration/creation of priority habitat</li> <li>• reversing the impacts of historic land drainage practices and restoring natural geomorphological processes</li> <li>• reducing impacts from diffuse and point source pollution</li> </ul> <p>We recommend this policy includes a map to help distinguish between:</p> <ul style="list-style-type: none"> <li>• the Wey Navigation only;</li> <li>• the River Wey only; and</li> </ul>	<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> <p>We have requested GIS data from the a number of sources that definitively identifies stretches of the Wey as navigation and river but this data is not available. Therefore, we are unable to include a map in the policy. The status of a stretch of watercourse will be established on a case-by-case basis.</p>

Left blank	<ul style="list-style-type: none"> <li>the combined River/Navigation;</li> </ul> <p>The policy should detail how potential conflicts between the two will be avoided/managed.</p>	Left blank
Left blank	<b>Historic England</b>	Left blank
Left blank	Support	Noted

## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	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>
Left blank	<b>Sport England</b>	Left blank
Left blank	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.
Left blank	<b>Send Parish Council</b>	Left blank

Left blank	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.
Left blank	<b>Guildford Residents' Association</b>	Left blank
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.
Left blank	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.
Left blank	<b>Weyside Urban Village</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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	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.



Left blank	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."	The policy now also now makes specific reference to both 'water frontage character' and 'historic interest'.
Left blank	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.
Left blank	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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
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.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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	The policy now includes a specific reference to the protection and enhancement (where possible) to key existing views, to,

Left blank	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.	from and along the river including those identified in the Guildford Town Centre Views SPD.
Left blank	<b>National Trust</b>	Left blank
Left blank	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.	The Navigation's conservation status has been highlighted within the supporting text of the policy. However the policy does now 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
Left blank	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.	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.
Left blank	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.	Agreed. To strengthen this particular point the following amendments to the Policy have been made: <ul style="list-style-type: none"> <li>• 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.</li> <li>• The need to protect and where possible enhance key existing views</li> <li>• Establish a positive relationship with the Navigations setting and waterfront character and its historic interest.</li> </ul>

Left blank	Left blank	<ul style="list-style-type: none"> <li>The protection/conservation of landscape features, building, structures and archaeological remains that are associate with the river's unique history and heritage.</li> </ul>
Left blank	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.
Left blank	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
Left blank	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.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Portland Capital</b>	Left blank
Left blank	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	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.

Left blank	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.	Left blank
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	<b>Reach Plc</b>	Left blank
Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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	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.

Left blank	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.	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.
Left blank	<b>Shalford Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>G-BUG</b>	Left blank
Left blank	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"> <li>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.</li> </ul> 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

Paragraph	Main Issue Summary	GBC Response
Left blank	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.
Left blank	Policy should reference views within, to and from the River Wey Corridor	Agreed - The policy has been amended to provide this clarity.
Left blank	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
Left blank	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.
Left blank	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.
Left blank	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, habitat and wildlife corridor and to ensure that their physical form are protected and/or enhanced, as well as their water quality and quantity.
Left blank	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.”.	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.  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.  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.

## Policy D12: Sustainable and Low Impact Development

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
Left blank	Agree	Noted
Left blank	<b>Highways England</b>	Left blank
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
Left blank	<b>Environment Agency</b>	Left blank
Left blank	<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>
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	Supported	Noted



Left blank	<b>Surrey County Council</b>	Left blank
Left blank	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 provide additional detail for Policy D2 1a) and b) that requires the efficient use and reuse of mineral resources and waste minimisation.	Noted
Left blank	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.
Left blank	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>
Left blank	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:	A reference to the document has been added to the introduction of the climate change section.

Left blank	<a href="https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy">https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy</a>	Left blank
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## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Thames Water</b>	Left blank
Left blank	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.
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	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, water saving measures will always be appropriate. Using "where appropriate" would suggest that there may be instances when it would not be.

Left blank	Left blank	The use of “where possible” allows for considerations of viability and feasibility but avoids suggesting that water efficiency may not be appropriate.
Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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	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.

Left blank	sleep period without dying of lack of 'oxygen' this policy should refer to BS EN 15251:2007.	Left blank
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.
Left blank	<b>National Trust</b>	Left blank
Left blank	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.
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	Strong reference needed to the reuse of existing buildings and demolition materials given that construction waste accounts	The policy includes a requirement for new developments to consider lifecycle emissions, which includes adaptability to

Left blank	for around a third of the UK's construction and demolition business.	<p>extend their useful lives and how construction materials can be reused or recycled after demolition.</p> <p>The policy includes support for retrofitting of existing buildings to improve energy efficiency and carbon emission rates. This will help 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>
Left blank	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.	Provision of EV charging points is addressed under ID11 Parking Standards.
Left blank	<b>Guildford Society</b>	Left blank
5.98/policy para. 3	<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 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.</p>

Left blank	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.
Left blank	<b>Woodland Trust</b>	Left blank
Left blank	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.
Left blank	<b>Merrow Residents' Association</b>	Left blank
Left blank	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 have no attached green space and no requirements for irrigation). However, the word "expect" indicates that it should be provided in most cases.  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.
Policy para 1).	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).	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.  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.

Left blank	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.	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 been highlighted in the Climate Change, Sustainable Design, Construction and Energy SPD.
Left blank	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.
Left blank	<b>Guildford Bike User Group (G-BUG)</b>	Left blank
Left blank	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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank



Left blank	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.
Left blank	<b>Weyside Urban Village</b>	Left blank
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.
Left blank	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.
Left blank	<b>Guildford Residents' association</b>	Left blank
Left blank	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.
Left blank	<b>Hallam Land Management</b>	Left blank

Left blank	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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary	GBC Response
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.
Left blank	All buildings should be carbon neutral.	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).
Left blank	All buildings should incorporate solar panels on the south facing side of the roofs	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.
Left blank	Rainwater harvesting systems should be on new buildings.	Policy D12 includes a requirement for water harvesting.
Left blank	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?	The national plan for the UK is to decarbonise electricity generation whilst moving heating away from gas and oil to electricity.  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.
Left blank	The policy/policy aims are in conflict with the level of growth proposed in the Local Plan: Strategy and Sites. <ul style="list-style-type: none"> <li>The water reserves in the borough are not adequate to meet the proposed level of growth. Population</li> </ul>	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.

Left blank	<p>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</p> <ul style="list-style-type: none"> <li>• 5.85 shows that eliminating energy need is the first priority – incompatible with growth.</li> </ul>	A local plan cannot eliminate energy need by refusing growth as this would not meet national requirements for local plans.
Left blank	Close collaboration with other Councils and indeed other countries should be established.	<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 APSE energy team which enables communication and collaboration with other councils nationally.</p>

## Policy D13: Climate change adaptation

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	<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:  <a href="https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy">https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy</a></p>	A reference to the strategy has been included in the supporting text.
Left blank	<b>Natural England</b>	Left blank
Left blank	<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
Left blank	<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

Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	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.
Left blank	<b>Environment Agency</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Weyside Urban Village</b>	Left blank
Left blank	Criterion 3 could include reference to building flood resilient housing as another measure to assist in minimising the urban heat island effect.	<p>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.</p> <p>The proposed change has not been added to the policy as it would imply that building houses in areas of flood risk is</p>

Left blank	Left blank	commonplace or routinely acceptable, which does not accord with policy P4 or national policy.
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	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).
Left blank	<b>Merrow Residents' Association</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	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.
Left blank	Does 'scheme' here refer to all projects, irrespective of size?	"Schemes" has been changed to "New developments" for clarity.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	D13 introduces requirements to prevent overheating, and to cope with more frequent and severe rainfall events. It is not	It is acknowledged that there can be a conflict between low energy design that maximises solar receipts for passive

Left blank	clear how the overheating prevention measures interact with other Policies.	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.
Left blank	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 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.
Left blank	<b>Surrey Wildlife Trust</b>	Left blank
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.
Left blank	<b>Woodland Trust</b>	Left blank
Left blank	Need a more ambitious and strategic approach to deploying natural solutions in urgent response to the climate crisis. 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. 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	The benefits of woodland in climate change adaptation are noted and agreed. The deployment of natural solutions would best be addressed through biodiversity policy. Flooding is addressed through other policies, which refer to the use of natural solutions. The biodiversity policies cover the multifunctional benefits of green space. 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



Left blank	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.	prevent buildings overheating is also set out in the Climate Change, Sustainable Design, Construction and Energy SPD.
Left blank	<b>Hallam Land Management</b>	Left blank
Left blank	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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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	Noted. This is a matter for planning decision makers taking account of the plan as a whole.

Left blank	the development should be withheld as clearly the site isn't appropriate for the proposal	Left blank
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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.
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	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. The preferred option for this policy does not require anything more or new from the Draft Climate Change, Sustainable Design, Construction and Energy SPD.	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.

Left blank	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>
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	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.
Left blank	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.
Left blank	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.	<p>Agreed. The policies in the plan seek to preserve green and blue infrastructure and to favour natural water management measures.</p> <p>The plan includes a policy covering SuDS which sets out best practice in sustainable drainage.</p>
Left blank	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

Left blank	Left blank	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.
Left blank	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.
Left blank	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.
Left blank	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.  I have no confidence in the vague statements made by water suppliers in response to planning applications.	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.

## Policy D14: Climate Change Mitigation

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	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: <a href="https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy">https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy</a>	A reference to the strategy has been included in the supporting text.
Left blank	<b>Natural England</b>	Left blank
Left blank	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.	Comment addressed in Biodiversity section
Left blank	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.	Comment addressed in Biodiversity section

Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	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.	The new policy adopts a standard of a 31% carbon reduction (against 2013 standards) for new dwellings and 27% for other buildings. This ensures the plan is consistent with the government's proposed new standards (Part L uplift). An extra clause has been added to encourage development to exceed this standard. Policy D2 offers strong support for zero carbon development.
Left blank	<b>Environment Agency</b>	Left blank
Left blank	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.	A reference to Water Resource Management Plans for the relevant water companies has been added to the supporting text for Policy D12.

## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Woodland Trust</b>	Left blank
Left blank	<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>Noted. The strategic approach deploying natural solutions is best be addressed through biodiversity policy.</p> <p>The benefits of woodland are noted and agreed. Regarding flooding, the SuDS policy notes the benefits of planting to slow down flood water and supports Natural Flood Management.</p> <p>Policy D13 Climate Change Adaptation 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>

Left blank	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).	The plan includes Open Space policies which safeguard green areas and require developments to provide more. Tree planting does not require planning permission (unless it constitutes a change of use) so allocating land 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.
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	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. The new policy adopts a standard of a 31% carbon reduction (against 2013 standards) for new dwellings and 27% for other buildings. This ensures the plan is consistent with the government's proposed new standards (Part L uplift). An extra clause has been added to encourage development to exceed this standard. Policy D2 offers strong support for zero carbon development.
Left blank	<b>Parish Councils</b>	Left blank
Left blank	Agree: Effingham, East Clendon, Shalford, East Horsley, Ash, West Horsley	Noted
Left blank	<b>Surrey Wildlife Trust</b>	Left blank
Left blank	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.	The new policy adopts a standard of a 31% carbon reduction (against 2013 standards) for new dwellings and 27% for other buildings. This ensures the plan is consistent with the government's proposed new standards (Part L uplift). An extra clause has been added to encourage development to exceed this standard. Policy D2 offers strong support for zero carbon development.

Left blank	<b>Guildford Society</b>	Left blank
Left blank	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. The new policy adopts a standard of a 31% carbon reduction (against 2013 standards) for new dwellings and 27% for other buildings. This ensures the plan is consistent with the government's proposed new standards (Part L uplift). An extra clause has been added to encourage development to exceed this standard. Policy D2 offers strong support for zero carbon development.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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.	The new policy adopts a standard of a 31% carbon reduction (against 2013 standards) for new dwellings and 27% for other buildings. This ensures the plan is consistent with the government's proposed new standards (Part L uplift). An extra clause has been added to encourage development to exceed this standard. Policy D2 offers strong support for zero carbon development..
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Home Builders' Federation</b>	Left blank
Left blank	Improvement in building standards should be consistent across the country and allow for a reasonable transition	The new policy adopts a standard of a 31% carbon reduction (against 2013 standards) for new dwellings and 27% for other



Left blank	<p>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.</p>	<p>buildings. This ensures the plan is consistent with the government's proposed new standards (Part L uplift). An extra clause has been added to encourage development to exceed this standard. Policy D2 offers strong support for zero carbon development.</p> <p>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.</p>
Left blank	<b>Worplesdon Parish Council</b>	Left blank
Left blank	<p>No policy is proposed until the outcome of the Future Homes Consultation. A policy would then need to be consulted upon.</p>	<p>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.</p>
Left blank	<b>Martin Grant Homes</b>	Left blank
Left blank	<p>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.</p>	<p>Noted.</p> <p>The new policy adopts a standard of a 31% carbon reduction (against 2013 standards) for new dwellings and 27% for other buildings. This ensures the plan is consistent with the government's proposed new standards (Part L uplift). An extra clause has been added to encourage development to exceed this standard. Policy D2 offers strong support for zero carbon development.</p> <p>This decision follows the outcome of the Future Homes consultation and new information regarding Future Buildings.</p>
Left blank	<b>West Horsley Parish Council</b>	Left blank

Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary	GBC Response
Left blank	<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</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>The new policy adopts a standard of a 31% carbon reduction (against 2013 standards) for new dwellings and 27% for other buildings. This ensures the plan is consistent with the government's proposed new standards (Part L uplift). An extra clause has been added to encourage development to exceed this standard. Policy D2 offers strong support for zero carbon development.</p> <p>Putting the proposed standards in policy ensures that the standard is not subject to a government delay or U-turn.</p>

Left blank	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.	Left blank
Left blank	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 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.
Left blank	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>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>The new policy adopts a standard of a 31% carbon reduction (against 2013 standards) for new dwellings and 27% for other buildings. This ensures the plan is consistent with the government's proposed new standards (Part L uplift). An extra clause has been added to encourage development to exceed this standard. Policy D2 offers strong support for zero carbon development.</p>

Left blank	Left blank	This higher standard will further support the use of heat pumps.
Left blank	<p>Is there a policy that supports or requires solar energy on roof space (for new developments and fitting to existing buildings)?</p> <p>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>The new policy adopts a standard of a 31% carbon reduction (against 2013 standards) for new dwellings and 27% for other buildings. This ensures the plan is consistent with the government's proposed new standards (Part L uplift). An extra clause has been added to encourage development to exceed this standard. Policy D2 offers strong support for zero carbon development. This would likely increase the use of rooftop solar.</p>

## Policy D15: Large scale renewable developments

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	<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:  <a href="https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy">https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy</a></p>	A reference to the strategy has been added to the supporting text.
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	Supported.	Noted
Left blank	<b>Waverley Borough Council</b>	Left blank
Left blank	<p>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.</p> <p>In light of this, we will need further information about the site allocations in the future before we can make a comment on this</p>	<p>It is agreed that renewable energy developments can have cross boundary impacts.</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.</p>

Left blank	<p>approach and would welcome early joint discussions on any sites being considered for allocation which could have cross-boundary impacts.</p> <p>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.</p>	Left blank
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## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	<p>The Policy is vague. It might be better expressed in another Council document.</p> <p>Careful cost benefit analysis is essential before any commitment is made.</p> <p>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.</p>	<p>The preferred option has not been taken forward.</p> <p>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.</p> <p>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.</p>

Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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), Areas of Great Landscape Value and on the openness of the green belt. This should be incorporated within the policy.	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 and includes protections for the AONB, AGLV and Green Belt.
Left blank	<b>Merrow Residents' Association</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	<b>Blackwell Park</b>	Left blank

Left blank	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 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.	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.
Left blank	<b>Portland Capital</b>	Left blank
Left blank	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.
Left blank	<b>Gatwick Airport</b>	Left blank
Left blank	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.
Left blank	<b>NATS [air traffic control]</b>	Left blank
Left blank	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	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.



Left blank	on aviation can be sought by contacting NATS Safeguarding, natssafeguarding@nats.co.uk or http://www.nats.aero/windfarms	Left blank
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	<p>Agree, with reservation. Paragraph 152 of the NPPF states “Local planning authorities should support community-led initiatives for renewable and low 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>The LPSS at para 4.5.32 states “The Council supports delivery of decentralised energy schemes with an 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>
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	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>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>
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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.	The option of allocating sites for renewable and low carbon energy has not been taken forward.

Left blank	<b>Parish Councils</b>	Left blank
Left blank	Agree: East Clandon, Effingham, Shalford, East Horsley, Ash	Noted

### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	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.	The plan includes policies that protect landscape, the AONB and important views.
Left blank	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.	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.
Left blank	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.	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.
Left blank	The Preferred Option lessens, but does not prevent the possibility of a development occurring on unallocated land.	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.
Left blank	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	Policy D2 of the LPSS requires new buildings to achieve a carbon reduction rate that is 20% lower than the national

Left blank	<p>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>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>
Left blank	<p>Concerns about allowing renewable developments on open space due to:</p> <ul style="list-style-type: none"> <li>• Impacts on existing biodiversity.</li> <li>• Loss of carbon sequestration potential</li> <li>• Loss of biodiversity gain potential (the Environment Bill will introduce new demands for land for biodiversity).</li> <li>• Impact on views into and out of AONB, AGLV and other countryside land</li> </ul> <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>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 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>
Left blank	<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>
Left blank	<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>

Left blank	Agree provided that monitoring is in place	[Not sure what this means]
Left blank	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.
Left blank	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 <b>and least damaging</b> 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.

## Policy D16: Designated Heritage Assets

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	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.	<p>Historic England (HE) are only consulted in certain circumstances, irrespective of whether the scheme is for enabling development or not, the most pertinent being:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> </ul> <p>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.</p>
Left blank	<b>Historic England</b>	Left blank
Left blank	Note that Historic England has recently (30 June 2020) published updated guidance on enabling development in Good	The preferred option had been to refer to Historic England's policy strategy that had been set out in the pre-June 2020

Left blank	Practice Advice Note 4: Enabling Development and Heritage Assets.	<p>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"> <li>• That it is the minimum necessary required to address the conservation deficit;</li> <li>• That it is necessary to solve the conservation needs of the asset and not the financial needs of the scheme;</li> <li>• 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;</li> <li>• That it has been accompanied by a conservation management plan</li> </ul>
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### Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Bridge End Farm</b>	Left blank
Left blank	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.

Left blank	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.
Left blank	<b>Guildford Residents' Association</b>	Left blank
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.
Left blank	<b>Martin Grant Homes</b>	Left blank
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.
Left blank	<b>Guildford Society</b>	Left blank
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.
Left blank	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.
Left blank	<b>Taylor Wimpey</b>	Left blank
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.

Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	<p>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>	<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"> <li>Listed Buildings;</li> <li>Conservation Areas;</li> <li>Schedule Monuments;</li> <li>Historic Parks &amp; Gardens</li> <li>Locally Listed Buildings;</li> <li>Article 4 Directions;</li> <li>County Sites of Archaeological Importance</li> <li>Areas of High Archaeological Potential</li> <li>Landscape Character Assessment</li> </ul> <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"> <li>Locally designated Historic Parks and Gardens</li> <li>Heritage at Risk</li> </ul>



Left blank	Left blank	<p>Residential Character - Residential Design Guide SPG War Memorials</p> <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>
Loss of Significance (2)	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	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.
Left blank	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.	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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	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"> <li>• must demonstrate a clear understanding of the contribution made by setting to a heritage assets significance; and</li> </ul>

Left blank	Left blank	<ul style="list-style-type: none"> <li>explain how the asset and its setting will be affected by a proposal</li> </ul> <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.
Left blank	<b>National Trust</b>	Left blank
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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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.	<p>It is difficult for the Local Authority to provide what its being asked here as the act of statutorily listing (and de-listing) 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</p>

Left blank	Left blank	ancillary object or structure within the curtilage of the building, which forms part of the land and has done so since before 1 <sup>st</sup> 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.
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## Other respondents

Paragraph	Main Issue Summary	GBC Response
Supporting Information (1)	'Expects' is not strong enough	Agreed – This is to be amended to 'must be supported'
Left blank	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.
Left blank	Compulsory that the developer includes CGI imagery alongside any planning application connected or neighbouring a heritage site	<p>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' 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</p>

Left blank	Left blank	means of assessing the likely impact of development on the townscape/landscape setting or nearby heritage asset.
Left blank	Preservation of Historical Buildings is important, but development of the site must include surrounding residents if said development impacts them	<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"> <li>• must demonstrate a clear understanding of the contribution made by setting to a heritage assets significance; and</li> <li>• explain how the asset and its setting will be affected by a proposal</li> </ul> <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

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
Left blank	Agree	Noted
Left blank	<b>Surrey County Council</b>	Left blank
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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Martin Grant Homes</b>	Left blank
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.

Left blank	Left blank	<p>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 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.
Left blank	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.
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	<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</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

Left blank	<i>“Development proposals are required to consider alterations, additions or other works, directly, indirectly or cumulatively affecting the special interest of a statutory listed or curtilage listed building and their settings”.</i>	many note that while they <i>“support the implementation of national policy it does not constitute a statement of Government policy itself”</i>  Additionally, it has been designed to provide some additional clarity for users.
Left blank	<b>Guildford Residents’ Association</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	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.

Left blank	Left blank	Left blank
Left blank	<b>The National Trust</b>	Left blank
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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Vision Group</b>	Left blank
Left blank	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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	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



Left blank	Left blank	policy D18: Conservation Areas makes provision for them within the supporting text.
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	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 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.
Left blank	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).	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.

## Policy D18: Conservation Areas

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	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.
Left blank	<b>Historic England</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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
Left blank	<b>Effingham Parish Council</b>	Left blank

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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	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</p>

Left blank	Left blank	policy - Policy P6/P7: Biodiversity in New Developments, in relation to proposed planting and landscape schemes
Left blank	<b>Reach PLC</b>	Left blank
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 <b>OR</b> 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.
Left blank	<b>Quod/Portland Capital</b>	Left blank
Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank

Left blank	A clear statement is needed that a CA Appraisal is a material consideration in application determinations, and that any approval will include a statement that the scheme is consistent with the appraisal.	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 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.
Left blank	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.
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	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

Left blank	Left blank	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.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Martin Grant Homes</b>	Left blank
Left blank	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.
Left blank	<b>The Woodland Trust</b>	Left blank
Left blank	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.
Left blank	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	The matter of tree planting is addressed in the emerging policy P6/P7: Biodiversity in New Developments.

Left blank	<p>ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.</p> <p>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.</p>	Left blank
Left blank	<b>The National Trust</b>	Left blank
Left blank	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.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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"> <li>Listed Buildings;</li> <li>Conservation Areas;</li> <li>Schedule Monuments;</li> <li>Historic Parks &amp; Gardens</li> </ul>

Left blank	Left blank	<p>Locally Listed Buildings;  Article 4 Directions;  County Sites of Archaeological Importance  Areas of High Archaeological Potential  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> <p>Locally designated Historic Parks and Gardens  Heritage at Risk  Residential Character - Residential Design Guide SPG  War Memorials</p> <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>
Left blank	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.	This is outside of the scope of the Policy. However, the supporting text does make reference to the Council's commitment to preparing character appraisals



Left blank	Left blank	for those Conservation Area that do not yet have an appraisal in place.
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	Conservation Areas should have the protection of Article 4 Directions	Article 4 Directions are outside the scope of policy
Left blank	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.
Left blank	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.
Left blank	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 <u>article 15 of the Development Management Procedure Order</u> (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

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
Left blank	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.
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Gardens Trust</b>	Left blank
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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	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

Left blank	Left blank	harm to setting, and that it respects the integrity of landscape and key views.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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>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>
Left blank	<b>Martin Grant Homes</b>	Left blank
Left blank	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>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>
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	<p>Policy does not seem necessary given the content of Policy D16</p> <p>Suggestion of:</p> <p><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</p>

Left blank	Left blank	<p>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>
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## Policy D20: Non-designated Heritage Assets

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	<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.</p> <p>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)	should specifically state that “archaeological desk-based assessment” will be required on archaeologically-sensitive sites.	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.
Left blank	<b>Historic England</b>	Left blank

Left blank	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.
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## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Merrow Residents' Association</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.
Left blank	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

Left blank	<b>Martin Grant Homes</b>	Left blank
Left blank	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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Reach PLC</b>	Left blank
Left blank	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
Left blank	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

Left blank	Left blank	removal of buildings and structures that do not contribute to significance.
Left blank	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.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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

Paragraph	Main Issue Summary	GBC Response
Left blank	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.
Left blank	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
Left blank	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.
Left blank	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

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Department for Education</b>	Left blank
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.
Left blank	<b>Historic England</b>	Left blank
Left blank	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.	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.
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	Supported.	Noted.

## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
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.	<p>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.</p> <p>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.</p>
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 99 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?	<p>Paragraph 1) is aligned with NPPF paragraph 99.</p> <p>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.</p>
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

Left blank	Left blank	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.
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	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.	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.  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.
Left blank	This policy should emphasize that the loss of open space will be resisted and that provision will be positively encouraged.	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.
Left blank	<b>East Horsley Parish Council</b>	Left blank
Left blank	Agree with the aims and requirements of Policy ID5 Preferred Option but we do not believe they are sufficient. ID5 makes no	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

Left blank	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.	usually also by neighbourhood plan policy and do not require further protection or clarification of NPPF provisions.  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.
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	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.	SANGs are not designated by the Local Plan. They are protected by NPPF paragraph 181(c), 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.  Common land is designated through a legal process and also benefits from legal protection.  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.  References to SANGs and Commons have been added in a footnote to the supporting text to clarify the above points.
Left blank	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.	This is largely outside the scope of this policy. Biodiversity is addressed under other emerging Local Plan policies, in particular P6/P7: Biodiversity in New Developments; and Policy D10a: Light Impacts and Dark Skies. Policy ID5 requires all developments on open spaces to achieve biodiversity net gains.

Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	It is recommended that 4) is strengthened by adding '...and does not harm its character or the local environment (by light pollution, for example)'.	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. Light pollution is adequately addressed in Policy D10a: Light Impacts and Dark Skies.
Left blank	This policy should emphasize that the loss of open space will be resisted and that provision will be positively encouraged.	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. Proposed policy ID6 sets standards for provision of open space in new residential developments.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.	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.
Left blank	A clause needs to be added to avoid developments that cause light, noise pollution.	Noise and light pollution are already adequately covered by Policy D10: Noise Impacts and Policy D10a Light Impacts and Dark Skies.
Left blank	<b>Guildford Vision Group</b>	Left blank
Left blank	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.

Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	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 carries the same weight at Local Plan policy. A reference to Local Green Space has been added to the supporting text.
Left blank	Every dwelling should have some Amenity Green Space, however small.	Policy ID6 includes standards for provision of public Amenity Green Space.
Left blank	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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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.

Left blank	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.
Left blank	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.
Left blank	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. 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. A reference to Local Green Space has been added to the supporting text to clarify this.
Left blank	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.” 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).	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 paragraph 99(a) only (paragraph 97(a) in the earlier February 2019 NPPF). 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



Left blank	Left blank	necessary to include further reference to this process in Local Plan policy.
Left blank	<b>Ripley Parish Council</b>	Left blank
Left blank	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 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.	This policy provides clarity for the protection applied to open 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. Protecting views of the countryside is beyond the remit of this policy.
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	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.	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. 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. A reference to Local Green Space has been added to the supporting text to clarify this.
Left blank	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.
Left blank	<b>Shalford Parish Council</b>	Left blank

Left blank	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.
Left blank	<b>Sport England</b>	Left blank
Left blank	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>Paragraph 1 of the policy makes it clear that exceedance of minimum standards will not justify development of open space on the basis that it 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> <p>The Open Space, Sport and Recreation Assessment 2017 (OSSRA) satisfies the requirement in NPPF paragraph 98 for an up-to-date needs assessment, although the Council intends to supplement this in future with a playing pitch strategy.</p>
Left blank	<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:</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#assessing-needs-and-playing-pitch-strategy-guidance">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#assessing-needs-and-playing-pitch-strategy-guidance</a></p>	<p>The Council intends to produce a Playing Pitch Strategy (PPS) which will supplement its 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 Grounds typology includes an allowance for sport pitches.</p> <p>The supporting text references the PPS.</p>

Left blank	<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> <p>The Open Space, Sport and Recreation Assessment 2017 (OSSRA) satisfies the requirements of paragraph 98, although the Council intends to supplement the OSSRA with a playing pitch strategy in future</p>
Left blank	<b>West Horsley Parish Council</b>	Left blank
Policy para. 4)	Point 4 needs clarifying.	<p>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.</p> <p>Explanation has been added to the supporting text.</p>
Left blank	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.
Left blank	<p>Reference to Neighbourhood Plans should be included.</p> <p>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.</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.

Left blank	Left blank	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.
Left blank	<b>Woodland Trust</b>	Left blank
Left blank	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.	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 gains on open space sites where development occurs. The biodiversity policies provide general support for tree planting in the right locations.

### Other respondents

Paragraph	Main Issue Summary	GBC Response
Policy para 4)	it is hard to see how a development on the open space will be beneficial	Works that constitute development may be necessary to maintain or improve open space. The supporting text explains the meaning of beneficial development and gives examples. These might include engineering works to improve drainage or upgrading existing facilities on the site.

## Policy ID6: Open Space in New Developments

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	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.
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	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.
Left blank	<b>Surrey Nature Partnership</b>	Left blank
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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Surrey Wildlife Trust</b>	Left blank

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.
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	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.
Left blank	Why is the play space standard for 'youth' only 0.03ha?	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.  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.
Left blank	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

Left blank	Left blank	off site. There is still an emphasis on play space being accessible and within walking distance of homes.
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Society</b>	Left blank
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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<p>The NPPF at paragraph 98 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 28m<sup>2</sup> per person to 26.8m<sup>2</sup> 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</p>

Left blank	Left blank	<p>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 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. 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.
Left blank	<b>Woodland Trust</b>	Left blank
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"> <li>• No person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.</li> <li>• 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.</li> </ul>	<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>



Left blank	<b>Bridge End Farm</b>	Left blank
Left blank	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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Weyside Urban Village</b>	Left blank
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

Left blank	Left blank	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.
Left blank	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.
Left blank	<b>Guildford Vision Group</b>	Left blank
Left blank	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.
Left blank	<b>Compton Parish Council</b>	Left blank

Left blank	<p>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.</p>	<p>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 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 this is an appropriate requirement.</p>
Left blank	<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>
Left blank	<p><b>Portland Capital</b></p>	Left blank
Left blank	<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</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 58). As a result, it is not necessary to include a viability clause in the policy.</p>

Left blank	<p>(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-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>	Left blank
Left blank	<b>Martin Grant Homes</b>	Left blank
Left blank	<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</p>

Left blank	Left blank	the layout and design of a scheme.
Left blank	<b>Hallam Land Management</b>	Left blank
Left blank	<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>
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
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>
Left blank	<b>Ripley Parish Council</b>	Left blank

<p>Policy paragraphs 2) and 3)</p>	<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 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>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 98) As a 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>
<p>Left blank</p>	<p><b>West Horsley Parish Council</b></p>	<p>Left blank</p>
<p>Left blank</p>	<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>Left blank</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 homes whilst the draft Policy ID6 proposes to require contributions for open space for schemes of 11 or more homes.</p> <p>Major residential development is defined in the NPPF as 10 dwellings or more, or a site of 0.5 hectares or more, however the minimum threshold for open space contributions has been set at 11 or more dwellings. This was primarily to tie in with the threshold of 11 or more units in the Government’s Written Ministerial Statement</p>

Left blank	Left blank	UIN HLWS47 on small-scale developers (made on 28 November 2014), below which the statement advised that tariff-style contributions should not be sought from proposed residential development.
Left blank	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.	The plan includes policies that govern character and design.
Left blank	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.
Left blank	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.
Left blank	<b>Ockham Parish Council</b>	Left blank
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.
Left blank	<b>Sport England</b>	Left blank
Left blank	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 is in	This comment appears to relate to the provision of playing pitches only.

Left blank	<p>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 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.</p>	<p>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 recreation grounds space that will be used for pitches. In the meantime, the proportion will be established on a case-by-case basis.</p>
Left blank	<p><b>Taylor Wimpey</b></p>	Left blank
Left blank	<p>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.</p>	<p>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.</p>
Left blank	<p>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<sup>2</sup> per person whilst the proposed ID6 policy is 26.8m<sup>2</sup> per person.</p>	<p>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.</p> <p>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.</p>



<p>Policy para 3)</p>	<p>ID6 requires further clarification of the detail and catchment distances between the differing types of Children’s Play (LAP, LEAP &amp; 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.</p> <p>On this basis TW propose the following changes to part 3:</p> <ul style="list-style-type: none"> <li>• Play Space (Children) - 480 meters of 10 mins walk time – <u>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></li> </ul>	<p>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 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>
<p>Policy para 4)</p>	<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</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</p>

Left blank	<p><u>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 Parks and Gardens and Amenity Green space typologies affording alternative opportunities for informal fitness and recreation activities.”</u></p>	<p>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>
Policy para 4)	<p>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.</p>	<p>Noted. The Council will consult on the draft Playing Pitch Strategy when it has been drafted.</p>
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"> <li>• Allotments: 480 meters of 10 mins walk time – <u>additional provision at 720m in Strategic Sites</u></li> </ul> <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>

Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	The names of documents should be written in full rather than using 'OSSRA' or other acronyms.	Acronyms are explained in the text when first used. Some documents have lengthy names and repeating their names breaks up the flow of the text.
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." <a href="https://morphocode.com/the-5-minute-walk/">https://morphocode.com/the-5-minute-walk/</a>	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.
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	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	This point is agreed. The policies protect existing open space and the standards for open space in new

Left blank	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.	development aim to increase provision above current levels.
Left blank	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

Paragraph	Main Issue Summary	GBC Response
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"> <li>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.</li> <li>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.</li> </ul> <p>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>	<p>The NPPF at paragraph 98 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's Open Space, Sports and Recreation Assessment provides an up-to-date needs assessment and the proposed standards for all types of open space in Policy ID6 are based on its recommendations. 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 28m<sup>2</sup> per person to 26.8m<sup>2</sup> 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.</p> <p>The respondent's point that no contribution would be required for children's play space on schemes below 50 dwellings, or for youth play space and parks and recreation grounds on schemes below 250 dwellings is incorrect. The policy will require on-site</p>

Left blank	Left blank	<p>provision where this is indicated in the table (by a tick), with financial contributions towards offsite provision or enhancement of existing open spaces required below these thresholds. The policy wording and table format 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>
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. 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)	Agree with preferred option, but not necessarily with the specified standards. What is the evidence on which the standards are based?	The standards have been established primarily through the Open Space, Sport and Recreation Assessment.
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

Left blank	.	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.
Left blank	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

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	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.
Left blank	<b>Highways England</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Albury Parish Council</b>	Left blank
Left blank	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	Policy ID11 sets out parking standards for new developments, whilst LPSS Policy ID3 requires development that would generate significant amount of

Left blank	exceptions in the AONB, associated requirements should be considered.	movement to undertake assessment and produce a travel plan. The Plan is intended to be read as a whole.
Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	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.
Left blank	[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 considered duplicated in the NPPF and other emerging LPDMP policies. The part of policy ID7 that dealt with water usage (through its proposed requirement for water collection and storage measures) is now covered in Policy P13: Sustainable Surface Water Management.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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."	The plan includes policies that govern character and design. It is not necessary to repeat those provisions in a further policy.
Left blank	<b>Guildford Residents' Association</b>	Left blank



Left blank	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.	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 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.
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.	Floodlighting is addressed in 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 other proposed policies. 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.
Left blank	<b>Guildford Vision Group</b>	Left blank
Left blank	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 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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	Walking links from the urban residential areas to open countryside space are poor. Commit to improving these.	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

Left blank	Left blank	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.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	<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"> <li>• R6 – Intensification of recreational use (which deal with improvement to recreational facilities through new floodlighting and all-weather surfaces)</li> <li>• R7 – Built facilities for recreational use (which deals with replacement and extensions to existing recreational buildings within settlements)</li> <li>• R8 – Golf courses (which sets out the design and extent of new golf course developments)</li> <li>• R9 – Noisy sports, adventure games and similar activities</li> <li>• R10 Water based recreational activities.</li> </ul> <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>The 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 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 unnecessary and unjustified, whilst paragraph (3) is covered by other policies dealing with climate change and water resources.</p>
Left blank	<b>Ripley Parish Council</b>	Left blank
Left blank	<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</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</p>

Left blank	<p>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>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 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>
Left blank	<b>Sport England</b>	Left blank
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?	<p>The planning process includes a test of reasonableness and the draft policy stated that link provision enhancement should be provided “where possible”.</p> <p>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?	<p>The planning process includes a test of reasonableness and the draft policy stated that link provision enhancement should be provided “where possible”.</p> <p>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>

### Other respondents

Paragraph	Main Issue Summary	GBC Response
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Left blank	Left blank	Left blank
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.
Left blank	<p>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.</p> <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>Policy ID7 was omitted in the Regulation 19 consultation document, however protecting the AONB was beyond its scope and already addressed by LPSS 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>
Left blank	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.	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.

Left blank	<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 most 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>
Left blank	<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 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 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

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Department for Education</b>	Left blank
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 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 <del>within urban areas and villages</del> provided that:</p> <p>a) they are appropriate in design terms  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</p>

Left blank	<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>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> <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>
Left blank	<b>Surrey County Council</b>	Left blank
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.</p> <p>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>

Left blank	Left blank	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.
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## Other organisations

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Guildford Residents Association</b>	Left blank
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.
Left blank	<b>Guildford Society</b>	Left blank
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>
Left blank	<b>Guildford Vision Group</b>	Left blank
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.



Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
General	<p>It is not considered that the binary approach of GBC in the preferred option for ID8 between proposals for new community 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>The Local Plan addresses community facilities as per NPPF para 92 across several policies, including policy E6, ID1 and 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>

Left blank	Left blank	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.
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.
Left blank	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.
Left blank	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.
Left blank	<b>Theatres Trust</b>	Left blank

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	<p>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.</p> <p>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.</p>	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 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.
Left blank	<b>East Clandon Parish Council</b>	Left blank
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-</p>

Left blank	Left blank	site infrastructure is sought, and secured via s106 legal agreements. These contributions may be pooled together toward items of infrastructure to address cumulative impacts.
Left blank	<b>Easy Horsley Parish Council</b>	Left blank
General	<p>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.</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>
Left blank	<b>Ripley Parish Council</b>	Left blank
General	The policy should reference s106 (or CIL if adopted) and contributions to adequately fund the maintenance and/or	Reference has been made in the supporting / introductory text that Council requires contributions via s106

Left blank	replacement of community buildings. Ripley Village Hall reflects a lack in funding in spite of it being a key infrastructure requirement in the Local Plan.	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.
Left blank	<b>Send Parish Council</b>	Left blank
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>Community Facilities must be a requirement of all strategic sites, and housing developments that propose to deliver 500 new homes</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> <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>
Left blank	<b>West Horsley Parish Council</b>	Left blank

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>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>	<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> <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>
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**Other respondents**

Paragraph	Main Issue Summary	GBC Response
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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.

## Policy ID9: Retention of Public Houses

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>East Clandon Parish Council</b>	Left blank
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.
Left blank	<b>East Horsley Parish Council</b>	Left blank



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 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:</i>  <i>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>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 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>
Left blank	<b>Guildford Society</b>	Left blank
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>
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Policy ID9	<p>Proposed additions:</p> <p>Permission will not normally be given for new A4 use in the designated town centre.</p> <p>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 87.</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>

Left blank	<b>Send Parish Council</b>	Left blank
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.	<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 community value.</p> <p>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.</p>
Left blank	<b>West Horsley Parish Council</b>	Left blank
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.	<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 community value.</p> <p>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.</p>

## Other respondents

Paragraph	Main Issue Summary	GBC Response
Policy ID9	<p>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.</p>	<p>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.</p> <p>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.</p>

## Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Environment Agency</b>	Left blank
Left blank	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.
Left blank	<b>Highways England</b>	Left blank
Left blank	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.
Left blank	<b>Surrey County Council</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>East Horsley Parish Council</b>	Left blank

Left blank	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.	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.  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>
Left blank	This policy should also include provision for improving the safety of cyclists, (e.g. cyclist & driver education and publicity, road surface improvements, etc.)	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.
Left blank	<b>The National Trust</b>	Left blank
Left blank	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.	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.
Left blank	<b>Surrey Hills AONB</b>	Left blank
Left blank	Lacks proposals for linking with other towns through the AONB.	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.

Left blank	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.
Left blank	<b>Shalford Parish Council</b>	Left blank
Left blank	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>
Left blank	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.	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. 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. 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.
Left blank	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

Left blank	Left blank	<p>connection. The map is not exhaustive and future proposals for further links will be considered and supported if feasible.</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>
Left blank	<b>Ripley Parish Council</b>	Left blank
Left blank	<p>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.</p>	<p>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.</p>
Left blank	<b>Guildford Society</b>	Left blank
Left blank	<p>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.</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> 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.</p>
Left blank	<p>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.</p>	<p>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.’</p> <p>The Transport Initiatives/Urban Movement proposals for the gyratory are indicative concepts which the consultants</p>

Left blank	Left blank	<p>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> <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>
Left blank	<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>
Left blank	<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>



Left blank	<b>The Woodland Trust</b>	Left blank
Left blank	<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>
Left blank	<b>Guildford Vision Group</b>	Left blank
Left blank	<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>
Left blank	<b>Cllr Seabrook</b>	Left blank
Left blank	<p>This policy is a good start but does not go far enough. It should also:</p> <ul style="list-style-type: none"> <li>• Show how the strategic sites are integrated into the network</li> <li>• Consider speed limits</li> <li>• Promote cycle routes between settlements</li> <li>• Specify minimum requirements for cycle lanes, tracks etc</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• The inclusion of the SCC map highlights proposed connections between settlements</li> </ul>

Left blank	Left blank	<ul style="list-style-type: none"> <li>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></li> </ul>
Left blank	<b>West Clandon Parish Council</b>	Left blank
Left blank	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/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. 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.
Left blank	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>

Left blank	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.
Left blank	<b>G-BUG (Guildford Bike User Group)</b>	Left blank
Left blank	G-BUG's aspiration is for segregated cycle lanes along all A-roads connecting Guildford to neighbouring towns and villages.	<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>
Left blank	<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"> <li>1. Recognising the priorities defined in the Report, for example providing cyclists with safe routes across the town centre, especially the gyratory</li> </ol>	<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"> <li>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</li> </ol>

<p>Left blank</p>	<ol style="list-style-type: none"> <li>2. Providing sufficient and secure cycle parking (cycle parking is also addressed by Question 38, but the Transport Initiatives/Urban Movement Feasibility Report provides much more detailed recommendations)</li> <li>3. Meeting best standards for cycle infrastructure</li> <li>4. Introducing low traffic neighbourhoods with 20mph speed limits, modal filters etc</li> <li>5. Integration with the proposed town-wide bike share scheme (eg docking stations)</li> <li>6. Providing wayfinding and signposting</li> <li>7. Reference to the Guildford Godalming Greenway: for the avoidance of doubt, this must be explicitly included in the network plans.</li> <li>8. The policy should include developing safe cycling routes to schools</li> </ol>	<p>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 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"> <li>2. The Transport Initiatives/Urban Movement report has been used to inform ID11: Parking Standards and further information is available in the Parking SPD.</li> <li>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.</li> <li>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.</li> <li>5. The bike share project was deferred in 2020.</li> <li>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></li> <li>7. The Guildford Godalming Greenway is included in the Policies Map.</li> <li>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</u></li> </ol>
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Left blank	Left blank	<u>further requirements identified as part of the planning application process.</u> This may include provision to schools, where appropriate.
Left blank	<b>Worplesdon Parish Council</b>	Left blank
Left blank	Need to add without an adverse impact on the safe operation of the pedestrian and bus networks.	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.
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	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.	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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	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>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</p>

Left blank	Left blank	Borough Council and/or Surrey County Council which detail local cycling infrastructure improvements, such as a Local Cycling and Walking Infrastructure Plan.”
Left blank	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.
Left blank	<b>Merrow Residents Association</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	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

Left blank	Left blank	<p>LPDMP Reg 19 consultation states: <u>The mechanisms for improvements resulting from new development are:</u></p> <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>
Left blank	Policy needs to consider the provision of secure cycle storage facilities at "end of journey" locations.	This is addressed in Policy ID11: Parking Standards.
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	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.
Left blank	<b>Send Parish Council</b>	Left blank

Left blank	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.
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	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.



Left blank	<b>Martin Grant Homes (Barton Willmore LLP)</b>	Left blank
Left blank	It is not certain if all of identified 'suggested routes' can be achieved without the need for third party land. New developments should not be required to deliver new routes which are outside of their land control.	It is not the intention of the policy to identify land ownership. Requirement (3), as drafted for the LPDMP Reg 19 consultation states " <u>The mechanisms for improvements resulting from new development are:</u> a) <u>constructing or improving cycle routes and infrastructure on land within the applicant's control;</u> b) <u>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> "
Left blank	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.	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.
Left blank	Pragmatism is required when considering the delivery of new developments where there may be an element of reducing road capacity to deliver cycle schemes	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.
Left blank	Infrastructure for charging e-bikes should be considered in key locations.	This topic has been addressed the Parking SPD.
Left blank	Any policy should also make an allowance for the provision of e-scooters, which are currently subject to trials across the UK.	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

Left blank	Left blank	infrastructure.
Left blank	<b>Wornesh Parish Council</b>	Left blank
Left blank	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.	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.
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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.	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>
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	Reference to Neighbourhood Plans should be included where possible cycle ways have been or could be identified.	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.

Left blank	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.
Left blank	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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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

Paragraph	Main Issue Summary	GBC Response
Left blank	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> "
Left blank	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	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</u>

Left blank	<p>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.</p> <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><u>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>
Left blank	<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>
Left blank	<p>This preferred option seems incomplete ("the policy will require").</p> <p>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>
Left blank	<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

### Prescribed bodies

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Highways England</b>	Left blank
Left blank	<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

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>East Horsley Parish Council</b>	Left blank
Left blank	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 by including the Electric Vehicle Charge Point (EVCP) standards in the draft Parking SPD, which provides greater flexibility for update
Left blank	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, should there be conflict, except in relation to strategic sites.”</u>
Left blank	<b>Shalford Parish Council</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	<b>Ripley Parish Council</b>	Left blank

Left blank	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.	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.
Left blank	<b>The Guildford Society</b>	Left blank
Left blank	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.	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.
Left blank	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.	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.
Left blank	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.	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.

Left blank	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.	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.
Left blank	The 2003 Plan had a section on parking for disabled drivers. There does not appear to be a counterpart in the new Plan.	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.
Left blank	Neither the 2003 Plan or this Plan included policy requiring the provision for car clubs in new residential settlements. This should be considered.	<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...</u>  <u>iii. access to a car club for residents and/or users;</u>"</p>
Left blank	<b>Guildford Vision Group</b>	Left blank
Left blank	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.	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 standards for Guildford town centre are more restrictive than for other areas of the borough, aiming to



Left blank	Left blank	ensure sustainable transport measures are prioritised over the private vehicle.
Left blank	<b>Cllr Seabrook</b>	Left blank
Left blank	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.
Left blank	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.	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.  The Reasoned Justification and the draft Parking Supplementary Planning Document provides further design guidance in relation to the delivery of secure cycle parking.
Left blank	<b>G-BUG</b>	Left blank
Left blank	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

Left blank	Left blank	provided in the draft Parking Supplementary Planning Document.
Left blank	<p>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').</p> <p>A policy should be added to enable 'Park and Cycle' from Park and Ride sites, by providing bike [storage at Park and Ride locations]</p>	<p>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.</p>
Left blank	<b>Albury Parish Council</b>	Left blank
Left blank	<p>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.</p>	<p>'Sui generis' covers all other uses which are not mentioned specifically, and these will be considered on the basis of individual assessments.</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>The provision of EVCP was covered in the Issues, Options and Preferred Options Consultation document. Requirement (2)(e) and (3)(e) set out the policy requirements for the provision of EVCP in the Reg 19 consultation document.</p>
Left blank	<b>Worplesdon Parish Council</b>	Left blank
Left blank	<p>It is welcome that visitor parking is included but what about unallocated parking to stop inconsiderate parking on streets.</p>	<p>It is considered that unallocated parking provides for any site user, including visitors. In Policy ID11, as drafted for the LPDMP Reg 19 consultation version. The policy states, at (2)(b) and (3)(c), that "<u>the provision of additional</u></p>

Left blank	Left blank	<u>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.
Left blank	Car parking management plans need to be included.	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.
Left blank	Car free developments in appropriate places need to be included.	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.
Left blank	Table 5 – Land use A2 missing. What about B1 development above 2500sqm? Hotels and residential institution – what about staff parking?	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.  For hotels and residential institutions, the parking standards make allowance for staff parking.
Left blank	Table 6 – no differentiation between long term and short-term cycle parking standards.	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.
Left blank	Table 7 – electric vehicle charging spaces need passive spaces as well	Requirements for enabling infrastructure to permit future connections were included in the standards presented in

Left blank	Left blank	the Issues, Options and Preferred Options consultation. EVCP standards, which include enabling infrastructure to permit future connections, are now contained within the draft Parking SPD, which enables greater flexibility for update.
Left blank	<b>Burpham Community Association</b>	Left blank
Left blank	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, should there be conflict, 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>
Left blank	<b>Merrow Residents Association</b>	Left blank
Left blank	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, should there be conflict, except in relation to strategic sites”</u>

Left blank	Left blank	<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>
Left blank	<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>
Left blank	<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 (5)(d) of Policy ID11, as drafted for the LPDMP Reg 19 consultation version states that “development proposals will be required to demonstrate that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users.”</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 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</p>

Left blank	Left blank	<p>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, should there be conflict, except in relation to strategic sites”</u></p>
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	<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>
Left blank	<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 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.</p>

Left blank	<b>Guildford Residents' Association</b>	Left blank
Left blank	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>
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	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.	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

Left blank	Left blank	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.
Left blank	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.	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.
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	The Borough's Parking Standards should be in line with SCC.	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.
Left blank	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.	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



Left blank	Left blank	unallocated (including visitor) spaces which could provide greater flexibility to accommodate the variation in car availability levels between dwellings.
Left blank	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 by including the EVCP standards in the draft Parking SPD, which provides greater flexibility for update.
Left blank	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, should there be conflict, except in relation to strategic sites."</u>
Left blank	<b>Home Builders Federation</b>	Left blank
Left blank	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.	<p>The DfT and Office for Low Emission Vehicles (OLEV (now renamed Office for Zero Emission Vehicles)) held a consultation on 'Electric vehicle chargepoints in residential and non-residential buildings' in 2019. It was proposed then that the Government intended to introduce future EVCP standards via Building Regulations, however it was considered that as consultation proposals they were not suitably advanced as to be mirrored for GBC's parking standards in the drafting of the Reg 18 consultation document.</p> <p>The outcome of the consultation has been published and the final EVCP requirements are planned to be implemented via Building Regulations. The Government intends to lay the implementing regulations in Parliament in 2021. In the meantime, the Government's consultation response identifies its proposed standards and we have sought to mirror these in our proposed standards. However, the standards are now contained in the draft Parking SPD. It is envisaged that the inclusion of the</p>

Left blank	Left blank	EVCP standards in SPD will enable GBC's requirements to be altered in future to be able to respond to any ratcheting of ambitions by Government or GBC, the latter which could take into account the rate of change observed in the vehicle fleet in the area.
Left blank	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 and so in this regard matches the Government's consultation proposal.
Left blank	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.	We understand that this scenario has been considered in the Government's proposals and exemptions will apply.
Left blank	<b>Martin Grant Homes (Barton Willmore LLP)</b>	Left blank
Left blank	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>

Left blank	<p>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 through the course of a day, consequently a lower overall provision should be identified where unallocated parking is provided.</p>	<p>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, 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>
Left blank	<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.</p>	<p>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.</p>
Left blank	<p>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>	<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>
Left blank	<p><b>Reach PLC (Litchfields)</b></p>	Left blank
Left blank	<p>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</p>	<p>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.</p>

Left blank	promote the inclusion of sustainable transport initiatives, such as shuttle bus services, travel plans and cycle parking facilities which would enable members of staff, guests and visitors to use sustainable/ non car modes of travel.	Left blank
Left blank	<b>Wornesh Parish Council</b>	Left blank
Left blank	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>
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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.
Left blank	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.

Left blank	<p>Outside of the town centre, large houses have been built with inadequate parking for residents and in Guildford the expansion of existing houses and HMOs has brought significant pressure on local parking.</p>	<p>The revised standards are benchmarked against local car availability levels whilst the approach to allocated/ 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>
Left blank	<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, should there be conflict, except in relation to strategic sites.”</u></p>
Left blank	<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"> <li>• Provision of adequate, safe, secure and managed cycle parking.</li> <li>• Provision of car clubs and payment towards ongoing membership for proposed residents (with access available to the wider community)</li> <li>• Provision of electric vehicle charging points for any on-site provision.</li> <li>• Remove ability of residents of new housing developments to apply for parking permits</li> <li>• Expansion of existing Controlled Parking Zones (CPZs) where site is close to areas not currently covered by CPZs</li> </ul>	<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.</p> <p>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"> <li>• The standards set out requirements for EVCP separately.</li> <li>• 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 amending the Traffic Regulation Order. The result is that residents of</li> </ul>

Left blank	Left blank	<p>these new developments have not been able to obtain parking permits for the CPZ.</p> <ul style="list-style-type: none"> <li>• The CPZ can also be expanded however this LPDMP cannot achieve this. This could be agreed by the Guildford Joint Committee.</li> </ul>
Left blank	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.	Policy H6 Requirement (1)(c) states that sufficient parking must be available for residential conversions and subdivisions. The draft Parking Supplementary Planning Document provides further detail in relation to parking provision for HMO's, extensions and conversions.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	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>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) and 2021 update (Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development). Surrey CC's parking guidance is non-statutory guidance.</p>
Left blank	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.	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 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

Left blank	Left blank	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.
Left blank	<b>Ockham Parish Council</b>	Left blank
Left blank	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.	The Reg 18 document was an Issues, Options and Preferred Options consultation. The Reg 19 consultation document refines the policy further.
Left blank	<b>Weyside Urban Village</b>	Left blank
Left blank	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.	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.  Similarly, the approach to the allocation of spaces provides for further flexibility dependent on local circumstances.
Left blank	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 standards are sufficiently evidenced based and are therefore needlessly high.	See response above.
Left blank	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.

Left blank	<p>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>	<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>
Left blank	<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, this is a clear over provision that would create poor quality and underused parking areas.</p>	<p>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.</p>
Left blank	<p><b>Taylor Wimpey (Savills)</b></p>	Left blank
Left blank	<p>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.</p>	<p>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.</p>



Left blank	<b>Burpham Neighbourhood Forum</b>	Left blank
Left blank	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, should there be conflict, except in relation to strategic sites.”</u></p>
Left blank	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.
Left blank	Table 3 - Residential development within Guildford town centre - Provision of car parking spaces. 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.	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)

Left blank	Left blank	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> The draft Parking Supplementary Planning Document contains further explanation regarding the rounding up or down of provision.
Left blank	Table 4 - Food retail (above 1000m <sup>2</sup> ) * - 1 car space per 14m <sup>2</sup> . 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.	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.
Left blank	Exhibition Hall figures need revisited, with consideration of HGVs Trailers and cars during set up.	This would be considered as part of the planning application process through the preparation of a transport assessment.
Left blank	Doctor and dentist parking should be reconsidered, including disabled parking.	The standards for doctors and dentists are now “individual assessment”, giving more flexibility based on site specific circumstances.  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.

### Other respondents

Paragraph	Main Issue Summary	GBC Response
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fre	<ol style="list-style-type: none"> <li>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.</li> <li>2. Further omissions are residential hostels and old people's homes.</li> <li>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.</li> <li>4. One cycle parking space per two students is too low for residential colleges.</li> <li>5. The 2003 Plan had a section on parking for disabled drivers. I could not find a counterpart in the new Plan.</li> <li>6. Neither Plan included provision for car clubs in new residential settlements. This should be considered.</li> </ol>	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>3. The standards for doctors, dentists and veterinary practices are now "individual assessment", giving more flexibility based on site specific circumstances.</li> <li>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 that all residential developments, except sheltered/ elderly housing or nursing homes, should have 1 space per bedroom.</li> <li>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.</li> <li>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</u></li> </ol>
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Left blank	Left blank	<u>required to demonstrate...iii. access to a car club for residents and/or users;"</u>
Left blank	<p>Prefer the alternate option although it depends on the implementation of the preferred policy.</p> <ol style="list-style-type: none"> <li>1. Minimum parking standards outside the town centre should not be the same for properties in the town</li> <li>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</li> <li>3. Minimum spaces will create space wastage where on street parking is available as opposed to an expected number of spaces however, with flexibility dependent on location and surroundings, it may be more appropriate for anything "excluding Guildford town centre".</li> <li>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?</li> </ol>	<p>1, 2 &amp; 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, should there be conflict, except in relation to strategic sites."</u> This allows for locally-determined policy, whilst allowing for flexibility in application in other areas based on factors such as location and development type.</p>
Left blank	<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>

Left blank	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.	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.
Left blank	How should provision be made for car club parking?	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>
Left blank	An overview of electric charging points would be worth preparing, to understand the implications of their introduction.	This would be beyond the scope of the Local Plan: Development Management Policies. Further information on EVCPs can be found in Surrey CC's <u>Electric Vehicle Strategy</u> .
Left blank	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.	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.
Left blank	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.	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.

## 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

**Table 1: Representations made by duty to cooperate prescribed bodies**

**Prescribed bodies**

Paragraph	Main Issue Summary/Respondent	GBC Response
Left blank	<b>Historic England</b>	Left blank
Left blank	<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.</p> <p>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>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</p>

Left blank	<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>there is depth to all of these policies and that they are reinforced by 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>
Left blank	<b>Natural England</b>	Left blank
Left blank	<p>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.</p>	That is correct.
Left blank	<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</p>	References such as this have been deleted as they are not relevant to the plan.



Left blank	Habitats Regulations development is not guaranteed permitted development.	Left blank
Left blank	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 <a href="#">Natural Capital Atlas</a> . 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.	Noted.
Left blank	<b>Surrey Nature Partnership</b>	Left blank
Left blank	No further comments. To the best of our knowledge the plan appears comprehensive.	Noted.
Left blank	<b>Department for Education</b>	Left blank
Left blank	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. 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). 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.	Noted.

Left blank	<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 Development<sup>1</sup> (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. 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>	Left blank
Left blank	<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</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>

Left blank	<p>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 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>Expectations with regard to community facility provision (including schools) to 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>
Left blank	<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>

Left blank	<b>Surrey County Council</b>	Left blank
Left blank	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.	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.  Local Plan 2003 Policy HE11 on scheduled ancient monuments was not saved in 2007 however emerging Policy D19 will cover this issue.
Left blank	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: <a href="https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy">https://www.surreycc.gov.uk/people-and-community/climate-change/what-are-we-doing/climate-change-strategy</a>	This strategy has been referred to in the supporting text for the climate change policies.
Left blank	<b>Environment Agency</b>	Left blank
Left blank	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.	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.

**Table 2: Representations that requested the inclusion of additional policies not proposed within the Regulation 18 version**

**Other organisations**

<b>Requested by</b>	<b>Missing policy</b>	<b>GBC Response</b>
Surrey County Council	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>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>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</p>

<p>Left blank</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><b>Explanation:</b></p> <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.</p> <p>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).</p> <p>Wind turbines within 30km of ARP have the potential to impact on radar utilised by the airport.</p> <p>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.</p> <p><b>Strategic Policy: Aerodrome Safeguarding</b></p> <p>Development will only be supported if it is consistent with the continued safe operation of Gatwick Airport.</p> <p>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).</p>	<p>back would be used to determine the application.</p>
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Left blank	<p>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> <p><b>Reasoned Justification</b></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 &amp; Country Planning Process by way of ODPM/DfT Circular 01/2003 'Safeguarding of Aerodromes &amp; 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>	Left blank
<p>Guildford Vision Group</p> <p>Left blank</p> <p>Residents for Guildford and Villages / Guildford Green Belt Group</p> <p>Left blank</p> <p>Left blank</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</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>

Left blank	<p>directly from the rushed production of Policy S3 in the LPSS.</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>	Left blank
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West Horsley Parish Council	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.	Policy E11: Horse Related Development has been renamed 'Animal Related Development' and its scope has been widened to cover all animals. The horse specific criteria have been retained separately within the policy, with the inclusion of more general criteria related to all animals.
West Horsley Parish Council  Residents for Guildford and Villages / Guildford Green Belt Group	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.  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.	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.  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 policies (where planning permission is required)?
West Horsley Parish Council  East Clandon Parish Council	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	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.  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.  With regards to extensions and replacement

<p>Residents for Guildford and Villages / Guildford Green Belt Group</p>	<p>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>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</p>

Left blank	Left blank	<p>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 considering the merits of a dark sky policy within their area.</p>
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.

<p>Holy Trinity Amenity Group</p>	<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"> <li>• Continuing trend to combine small retail units into large ones.</li> <li>• 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.</li> <li>• Permissible uses in High Street are too restrictive. Policy needs changing to reflect changed needs.</li> <li>• Inactive ground floor frontage – in particular restaurants should have an active frontage.</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• We are not reviewing town centre/district centre boundaries as part of the LPDMP</li> <li>• 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 permission. Furthermore, some changes of use from E use class to residential can now occur under Permitted Development.</li> <li>• LPSS Policies S3 and D1 combined with emerging LPDMP Policy D8 all seek to achieve active ground floor frontages, natural surveillance and lively streets</li> </ul>
<p>Residents for Guildford and Villages / Guildford Green Belt Group</p>	<p>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>	<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')). The retail evidence base<sup>1</sup> 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> <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>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>
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<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>
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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.

**Table 3: Representations made by other bodies and individuals**

**Other organisations**

<b>Paragraph</b>	<b>Main Issue Summary/Respondent</b>	<b>GBC Response</b>
Left blank	<b>Taylor Wimpey</b>	Left blank
Left blank	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 polices 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.	It is considered that where overlap exists that this is justified as the LPDMP provides additional detail.
Left blank	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.	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.
Left blank	<b>Merrow Residents' Association</b>	Left blank
Left blank	We feel that these policies do not give enough prominence to the need to conserve water by harnessing rain water in new developments	This is addressed by emerging policy D12
Left blank	We feel that these policies do not give enough prominence to the need to conserve the green spaces in the borough	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.

Left blank	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.	This is addressed by Policy ID1 which requires that infrastructure is provided when needed to support development.
Left blank	There is no specific policy covering the Green Belt (Policy P2 in the LPSS)	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.
Left blank	There is no specific policy covering the AONB	This is addressed by LPSS Policy P1
Left blank	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.
Left blank	<b>Bridge End Farm</b>	Left blank
Left blank	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.
Left blank	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.



Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.
Left blank	<b>Guildford Vision Group</b>	Left blank
Left blank	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.
Left blank	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.
Left blank	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"> <li>• Support for wider pedestrianisation</li> <li>• Opening up the riverside</li> <li>• Tackling the gyratory and congestion.</li> </ul> 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	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.

Left blank	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.	Left blank
Left blank	<b>Effingham Parish Council</b>	Left blank
Left blank	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.
Left blank	<b>West Horsley Parish Council</b>	Left blank
Left blank	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.
Left blank	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>
Left blank	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	All design policies are applicable in all areas. LPSS Policy D1 and LPDMP Policy D9 include specific considerations for villages.

Left blank	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.	Left blank
Left blank	<b>West Clandon Parish Council</b>	Left blank
Left blank	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>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>
Left blank	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?	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.
Left blank	<b>Holy Trinity Amenity Group</b>	Left blank
Left blank	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.	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 consultation was seeking views on whether there were any other options.

Left blank	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.
Left blank	<b>Hallam Land</b>	Left blank
Left blank	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.
Left blank	<b>Send Parish Council</b>	Left blank
Left blank	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.
Left blank	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.

Left blank	<p>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, 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>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 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>
Left blank	<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 wording has been considered in drafting the new policies.</p>
Left blank	<p><b>West Horsley Parish Council</b></p>	Left blank
Left blank	<p>It is disappointing that there is virtually no reference to Neighbourhood Plans throughout the topic papers and suggested policies. Once adopted</p>	<p>NPs are adopted in their own right. They are part of the Development Plan, carry their own weight and sit</p>

Left blank	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>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>
Left blank	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.
Left blank	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.	<p>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 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</p>

Left blank	Left blank	<p>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>
Left blank	<b>East Clandon Parish Council</b>	Left blank
Left blank	<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> <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>
Left blank	<p>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.</p>	<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>
Left blank	<p>The LPDMP has little to say on infrastructure provision.</p>	<p>This is addressed in the LPSS.</p>
Left blank	<p>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</p>	<p>For most policies there is no other reasonable alternative however the purpose of the Regulation</p>

Left blank	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	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'
Left blank	The Local Plan 2003 included the following which is missing from the LDMP: <ol style="list-style-type: none"> <li>1. List of scheduled monuments</li> <li>2. Lists of SSSIs, SNCIs and RIGS. RIGS are given in the new P14.</li> <li>3. Notifiable installations.</li> <li>4. Glossary. Many 'Definitions' are scattered throughout the new Plan. A single Glossary would be better.</li> </ol>	<ol style="list-style-type: none"> <li>1. The supporting text includes a list of scheduled monuments.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>
Left blank	<b>Guildford Society</b>	Left blank
Left blank	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.	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.
Left blank	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	The suite of policies is considered necessary to ensure high quality sustainable development



Left blank	Council already lists information that may be required for a full planning application under 36 different headings.)	Left blank
Left blank	<b>Residents for Guildford and Villages / Guildford Green Belt Group</b>	Left blank
Left blank	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.	Where specific concerns have been raised these have been addressed under the relevant policy.
Left blank	<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 seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.  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.”  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</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>

Left blank	not be effective or justified without further reference to them where appropriate.	Left blank
Left blank	Concern over the way in which the policies of the plan are laid out within the DMP.	The Regulation 18 document does not contain any policy wording. Where specific concerns have been raised these have been addressed under the relevant policy.
Left blank	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.	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.
Left blank	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 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.	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 ensure that the inspector can understand the issues raised throughout plan preparation.
Left blank	<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).</p> <p>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</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.</p>

Left blank	<p>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>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>
Left blank	<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>
Left blank	<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>
Left blank	<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</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>

Left blank	<p>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>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, provided and/or funded by new development.</p>
Left blank	<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>

Left blank	Left blank	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 considering the merits of a dark sky policy within their area.
Left blank	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.
Left blank	<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.</i></p> <p><i>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>	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.
Left blank	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	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.

Left blank	<p>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 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>	Left blank
Left blank	<b>Compton Parish Council</b>	Left blank
Left blank	<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.
Left blank	<b>East Horsley Parish Council</b>	Left blank
Left blank	<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</p>	<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>

Left blank	<p>the Local Plan Part 1 and subject to extensive national policies but there are no less than five further Historic Environment polices within the DMP (Policies D16 to D20) providing further clarification of Policy D3. 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>	Left blank
Left blank	<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>
Left blank	<b>M&amp;G Real Estate</b>	Left blank
Left blank	<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 base<sup>1</sup> 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> <p>The role of town centres is evolving. This is a response to changing consumer habits and digital technology, which both create opportunities</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>

Left blank	<p>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 facilities 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>	Left blank
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### Other respondents

Paragraph	Main Issue Summary	GBC Response
Left blank	<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"> <li>• 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.</li> <li>• 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</li> </ul>	Any SANG proposal must be agreed by Natural England for it to be designated as such.



Left blank	<p>tree cover is not conducive to solo walkers feeling 'safe'.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• COVID may remain with us and require even wider planned pathways which would compromise the ancient woodland status.</li> <li>• Any access via the Research threatens integrity of ancient woodland.</li> </ul>	Left blank
Left blank	<p>Policies in the DMP 2020 are generally weaker than those in Local Plan 2003</p> <ol style="list-style-type: none"> <li>1. lack of clear guidance</li> <li>2. One general policy, to replace a number of policies which previously gave specified guidance in LP 2003, does not give the same protection</li> <li>3. No policy for AONB or Green Belt.</li> <li>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</li> <li>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.</li> </ol>	<ol style="list-style-type: none"> <li>1. Where specific concerns have been raised these have been addressed under the relevant policy.</li> <li>2. Where specific concerns have been raised these have been addressed under the relevant policy.</li> <li>3. The LPSS adequately addressed Green belt and the AONB</li> <li>4. LPSS Policy P1(4) references the AONB Management Plan which includes policies that protects views.</li> <li>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.</li> </ol>
Left blank	<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</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.</p>

Left blank	of them have given to the preparation of their Neighbourhood Plans.	<p>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>
Left blank	A policy on dark skies should be included, particularly for the AONB.	<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 considering the merits of a dark sky policy within their area.</p>

Left blank	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.
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	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	The proposals for Weyside Urban Village include community uses which could include a café.

Left blank	community can just drop in. The Weyside Cafe would be ideal.	Left blank
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	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.
Left blank	AONB must be preserved and protected (along with the associated flora and fauna and their habitats)	This is addressed by LPSS Policy P1.
Left blank	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.
Left blank	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.

Left blank	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'
Left blank	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.)	The suite of policies is considered necessary to ensure high quality sustainable development
Left blank	<p>The following were included in the 2003 plan but are missing from the new plan:</p> <ol style="list-style-type: none"> <li>1. List of scheduled monuments</li> <li>2. Lists of SSSIs, SNCIs (RIGS are listed in the new P14)</li> <li>3. Notifiable installations. Four gas installations are given in the 2003 plan.</li> <li>4. Glossary. Many 'Definitions' are scattered throughout the new Plan. A single Glossary would be better.</li> </ol>	<ol style="list-style-type: none"> <li>1. A list of scheduled monuments has been included in the supporting text.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>