

## Minor modifications to the Submission Local Plan (2017)

The proposed minor modifications to the Submission Local Plan: Strategy and Sites are set out below. Modified text is red. New text is shown as underlined and deleted text is shown as ~~strikethrough~~. Corrected typographical and formatting errors have not been displayed in this schedule.

The Minor Modifications listed in this Schedule have, where relevant, been applied to the recommended Main Modifications to the Submission Local Plan which accompanied the Inspector’s final report.

Paragraph or Section	Proposed Modification
<b>Preamble and Introductory text</b>	
Contents Page	General factual update, in addition to: 3. Our vision and <u>ambition</u> <del>objectives</del>
Foreword	Factual Update to Foreword
Introduction	<p>1.9 [...] To demonstrate how we have addressed this duty, we have published a Duty to Cooperate topic paper that describes who we have cooperated with, the matters we have discussed and when and where we met. <del>We have produced the topic paper alongside this Proposed Submission Local Plan and will submit it to the Secretary of State for consideration and Examination in Public.</del></p> <p>[...]</p> <p>1.14 We will publish a Policies Map alongside the Local Plan that will:</p> <ul style="list-style-type: none"> <li>• identify areas we want to protect including the Surrey Hills Area of Outstanding Natural Beauty, the Special Protection Areas and the Metropolitan Green Belt</li> <li>• <del>illustrate safeguarded sites and designated safeguarding areas identified in the Minerals and Waste Development Framework</del></li> <li>• identify strategic sites and strategic infrastructure</li> <li>• set out the areas to which specific policies apply.</li> </ul>

Paragraph or Section	Proposed Modification
	<p>1.15 Our key diagram <a href="#">in section 2</a> illustrates the broad locations identified for strategic development within the borough over the plan period. The symbols on the key diagram are indicative and do not represent precise locations or sites. More detailed diagrammatic information is illustrated on the Policies Map.</p>
Diagram	<p>‘Stages of preparing the Local Plan: strategy and sites’ diagram removed.</p>
Key facts about the borough	<p>2.14a Significant, recurrent traffic congestion is experienced during peak hours on the A3 trunk road, <del>both as it runs</del> through the urban area of Guildford, with queuing extending back onto the dual carriageway section of the eastbound A31, and to the east between the Ripley junction and the A3/M25 (Junction 10) Wisley interchange junction...</p>
Key facts about the borough	<p>2.33 The borough is located within the Enterprise M3 Local Economic Partnership (LEP) area. The LEP aims to drive economic growth over a region covering most of Surrey and Hampshire by working with key partners (including Local Authorities), businesses and central government. The LEP published its ‘Strategic Economic Plan, Growth Deal and Delivery Plan’ in March 2014. <a href="#">The Enterprise M3 Strategic Economic Plan identifies Guildford as a Growth Town.</a> Whilst the document does not form part of the development plan, it provides an important overview of the LEP’s priorities and plans for delivering economic prosperity in the region.</p> <p>2.33a Surrey Nature Partnership (SyNP) is the nature partnership for Surrey recognised by the government. The NPPF requires us to collaborate and consult with the SyNP when drawing up plans. The SyNP has produced ‘Naturally Richer: a Natural Capital Investment Strategy for Surrey’ (2015), to plan and coordinate investment in the natural environment of Surrey. The State of Surrey’s Nature (2017) provides a base line against which to measure changes in biodiversity and identifies priorities for nature conservation and investment.</p> <p>2.35 The process includes an appraisal of options to demonstrate that those chosen are the most suitable when tested against reasonable alternatives. Each policy and site has been appraised. We <del>will</del><a href="#">have published</a> the SA as a separate document to support the Local Plan. Full details of the SA can be found on the Council’s website via the following link: <a href="http://www.guildford.gov.uk/newlocalplan/sustainabilityappraisal">www.guildford.gov.uk/newlocalplan/sustainabilityappraisal</a>.</p>

Paragraph or Section	Proposed Modification
Our vision and objectives; Spatial vision	<p>The role of Guildford town centre as the largest retail, service, administrative and commercial centre in Surrey will be maintained and enhanced. The major town centre redevelopment of North Street will include 41,000 sq m of comparison retail floorspace together with 6,000 sq m of food and drink uses and up to 400 flats. <u>The redevelopment of Guildford Railway Station will deliver significant station improvements and assist in increasing station capacity, whilst making a contribution to meeting housing need on a brownfield site, in a highly sustainable location within the town centre.</u> All development within the town centre will need to respect and enhance the unique setting and historical character of the town and be of the highest design and environmental standards. There will be significant ongoing investment in the public realm specifically designed to enhance the pedestrian experience of using the town centre.</p> <p>Factual Update to Spatial Vision, in addition to:</p> <p>3.2 We will aim to implement our spatial vision by striving to achieve the thirteen strategic objectives identified below. Each objective falls within one of the <del>four</del> core themes running through this document and the Council's Corporate Plan (2015<del>8</del>-2020<del>3</del>).</p>
Table: Environment row, Ambition column	To <u>maintain, conserve</u> <del>protect</del> and enhance the environment and balance the needs of all residents and visitors with the desired outcome of improved overall wellbeing.
<b>Policy S1: Presumption in favour of sustainable development</b>	
Reasoned Justification	<p>4.1.4 [...] In accordance with policies in the NPPF that protect important natural and heritage assets, the presumption will not automatically apply to; habitats sites (including sites protected under the Birds and Habitats Directives), designated as Sites of Special Scientific Interest (SSSIs), <del>development requiring appropriate assessment because of its potential impact on a habitats site<sup>8</sup></del>; land designated as Green Belt or Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets, or locations identified as at risk of flooding.</p> <p><del><sup>8</sup> This includes not new residential development within 5km of the Thames Basin Heath Special Protection Area and residential development of over 50 net new dwellings within 7km of the Thames Basin Heath Special Protection Area. See Policy P5 Thames Basin Heaths Special Protection Area.</del></p>

Paragraph or Section	Proposed Modification
<b>Policy S2: Planning for the borough – our spatial development strategy</b>	
Introduction	<p>4.1.6 <del>Our Development will be directed to preference is to focus growth in</del> the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate). <u>In sequential order. T</u>hese locations are:</p> <ul style="list-style-type: none"> <li>• Guildford town centre</li> <li>• <u>Guildford, and Ash and Tongham</u> urban areas</li> <li>• inset villages</li> <li>• identified Green Belt villages.</li> </ul>
	<p>4.1.8 Whilst these sustainable locations are our preferred locations for new development, they <del>are have been</del> unable to accommodate all of the new development <u>that is required in order to meet identified needs we need. For this reason, the plan allocates sites outside of the existing built up</u> <del>We will therefore release allocated land for development in other areas. The following spatial hierarchy has been applied as part of developing the plan's spatial strategy for meeting planned growth: These include:</del></p> <ul style="list-style-type: none"> <li>• countryside beyond the Green Belt <del>around Ash and Tongham</del></li> <li>• urban extensions <del>to Guildford</del></li> <li>• new settlement at the former Wisley airfield</li> <li>• <del>development around extensions to</del> villages <del>(including some expansion).</del></li> </ul> <p>4.1.9 <del>These will be phased according to deliverability and identified need</del> <u>Development will be phased across the plan period.</u> We anticipate that smaller allocated sites will provide the majority of supply in the first five years. <del>whilst Larger development sites, including the larger</del> strategic development sites, will deliver the majority of new development in the 6-10 and 11-15 year periods of the plan. The strategic development sites are: [...]</p>
Policy	<p>(2a) <u>Provision has been made for at least</u> 36,100 – 43,700 sq m of office and research and development (B1a and b) floorspace <u>(net)</u>; 3.7– 4.1 hectares of industrial (B1c, B2 and B8) land <u>(gross)</u>; and <u>approximately</u> 41,000 sq m of comparison retail floorspace <u>(gross)</u>.</p>

Paragraph or Section	Proposed Modification
	<p>(3) <del>We will identify</del><u>Provision has been made for</u> 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 <del>we the Council</del> will seek to <u>make provision for</u><del>provide</del> 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople who do not meet the definition. <del>The Council</del><u>We</u> will also seek to make provision for 8 permanent pitches to meet potential additional need of households of unknown planning status.</p>
Key Evidence	<ul style="list-style-type: none"> <li>• <u>Review of Housing Needs Evidence across West Surrey HMA (Guildford Borough Council, 2017)</u></li> <li>• Land Availability Assessment (Guildford Borough Council, 201<u>7</u><del>6</del>)</li> </ul>
<b>Policy S3: Delivery of development and regeneration within Guildford Town Centre</b>	
Introduction	<p><u>Introduction</u></p> <p>4.1.12 Guildford town centre has a unique setting and historic character and is the largest retail, service, administrative and commercial centre in the county of Surrey (measured by floorspace and number of units<sup>1</sup>). With good transport accessibility by rail and road, it is one of the key town centres in the South East outside of London.</p> <p>4.1.13 The town centre is centred on two linear features, the River Wey, and the High Street that rises up the valley side from Town Bridge. Related to this, the centre has striking topography, with attractive views to the surrounding countryside south and east of the town centre. It is renowned for its picturesque historic High Street and lanes off it, known as ‘gates’ which link the High Street, the Castle and the other key shopping street, North Street. The setting and the historic street pattern in the central area of the town centre are a vital part of its special character as is the range and concentration of heritage assets.</p>

<sup>1</sup> Experian

Paragraph or Section	Proposed Modification
	<p><u>4.1.14 The NPPF states that policies should recognise that residential development often plays an important role in ensuring the vitality of centres and therefore should encourage residential development on appropriate sites. The Council is committed to ensuring that the policies and allocations within the Local Plan, including those within the Guildford Town Centre, are deliverable and its objectives are realised over the plan period. Furthermore, the Council remains committed to supporting any further opportunities for future development and regeneration within the town centre that reinforces its important role and function. The Guildford Town Centre is intended to function as the key focus for a more intense vibrant mix of uses including residential, office, retail, leisure, tourism, entertainment, and arts and cultural facilities.</u></p> <p><u>4.1.15 The Council is facilitating the delivery of development through a range of proactive measures. These include:</u></p> <ul style="list-style-type: none"> <li>• <u>Driving and unlocking key development projects that form a basis for the delivery of the Local Plan (such as at North Street, A6; Guildford Park Road and Bright Hill car parks, A11 and A12);</u></li> <li>• <u>Playing a lead role, working with other delivery partners, in infrastructure interventions that realise growth and regeneration opportunities;</u></li> <li>• <u>Advancing and collaborating on key regeneration opportunities as part of the Guildford Town Centre Regeneration Strategy, which include leveraging its own landholdings as part of efforts to promote mixed use and higher density development supporting the vitality and vibrancy of the town centre.</u></li> </ul> <p><u>4.1.16 In undertaking and further to these actions, the Council will explore the use of a range of mechanisms at its disposal to support regeneration and the accelerated development of housing and mixed-use schemes. These include using, where appropriate, compulsory purchase powers, granting permission in principle, assisting in land assembly and playing a coordinating role with its development partners around development opportunities.</u></p> <p><u>4.1.17 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.</u></p>

Paragraph or Section	Proposed Modification
Reasoned Justification	<p>4.1.19 This policy and the Town Centre Regeneration Strategy will help deliver the following objectives:</p> <ul style="list-style-type: none"> <li>(a) enhance the vibrancy of Guildford Town Centre</li> <li>(b) create and foster high quality design</li> <li>(c) protect the town's heritage <del>and overall feel</del> <u>and character as an historic market town</u></li> <li>(d) respect existing townscape at both the street and roof level</li> <li>(e) create an enhanced and more positive public realm</li> <li>(f) reduce the concrete environment atmosphere</li> <li>(g) realise the Council's 'drive to, not through' concept to reduce the impact of traffic in the town centre, complementing future environmental improvements</li> <li>(h) <u>improve walking links from</u> <del>link</del> the Town Centre to the train station</li> <li>(i) open up the River Wey and improve connections to the river</li> <li>(j) assist in meeting Guildford's housing demand</li> <li>(k) ensure schemes are sustainable and do not <u>block</u> future development potential</li> <li>(l) promote and create an investment friendly environment</li> </ul> <p>[...]</p> <p>4.1.24 The public realm includes publicly-owned streets, squares, pathways, parks, publicly accessible open spaces, rights of ways, and any public or private building and facilities that are accessible by all.</p>

Paragraph or Section	Proposed Modification
<b>Policy H1: Homes for all</b>	
Policy	<p><b>Housing <del>M</del>mix and standards</b></p> <p>[...]</p> <p><u>(2a) All new residential development must conform to the nationally described space standards as set out by the Ministry of Housing, Communities and Local Government (MHCLG).</u></p> <p><b>Accessible homes</b></p> <p>(3) On residential development sites of 25 homes or more, 10% of new homes will be required to meet Building Regulations M4 (2) category 2 standard (<del>to be</del> 'accessible and adaptable dwellings'), and 5% of new homes will be required to meet Building Regulations M4 (3)(b) category 3 ('wheelchair user-<del>accessible</del> dwellings-<del>standard</del>'), or any subsequent legislation on making homes accessible and adaptable.</p>
Policy	<p>(6a) <u>In addition to site allocations within this Local Plan, Accommodation for Gypsy, Traveller or Travelling Showpeople (whether they meet the Planning Policy for Traveller Sites definition or not) should be provided on development sites of 500 homes or more whilst there remains an identified need in our borough. For 500 to 999 homes two pitches or plots should be provided, for 1,000 to 1,499 homes four pitches or plots, for 1,500 to 1,999 homes six pitches or plots and for 2,000 or more homes eight pitches or plots.</u></p>
Definitions	<p>4.2.1a Evidence of <del>active and comprehensive appropriate</del> marketing <u>in relation to self-build plots will be included in a forthcoming Supplementary Planning Document-is defined in appendix A2. 'Existing housing' in H1 (2) means housing in existence at the time of the planning application.</u></p>
Reasoned Justification	<p>4.2.10 [...] <u>Accessible dwellings should be provided on parts of residential development sites that are not designated for self-build and custom-build houses.</u></p>

Paragraph or Section	Proposed Modification
Reasoned Justification	<p>4.2.23 [...] A total of <del>59-57</del> Gypsy and Traveller pitches (net) and 8 Travelling Showpeople plots (net) have been identified in the site allocation policies. The TAA (2017) found no evidence of need for a transit site within our borough. The Council will keep this position under review and, should the need for a transit site arise, will work with neighbouring authorities to address this.</p> <p>4.2.24 Sites allocated for ‘Gypsy and Traveller pitches (sui generis)’ shall be considered for use by “Gypsies and Travellers” as defined by Planning Policy for Traveller Sites and/or for those who do not meet that definition, according to their needs as identified in the council’s Traveller Accommodation Assessment (2017) (and any updates) and in accordance with Planning Policy for Traveller Sites (or any updates which may be issued in the future). <u>In addition to Local Plan site allocations</u>, Gypsy, Traveller and Travelling Showpeople accommodation is required within development sites of 500 homes or more, <u>whilst there remains a need in Guildford Borough</u>, to help create sustainable, mixed communities with suitable accommodation for all. The loss of pitches or plots will be strongly resisted.</p>
Footnote in paragraph 4.2.23	<p><sup>14</sup> <u>Planning Policy for Traveller Sites 2015 paragraph 9 states that Local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area.</u></p>

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Paragraph or Section	Proposed Modification
<b>Policy H2: Affordable Homes</b>	
Introduction	4.2.30 Guildford borough is generally a prosperous area of the country, offering a good quality of environment in its towns and rural areas, in close proximity to a wealth of employment and leisure opportunities. This does come at a price. High demand to live here and limited supply <u>of existing and new housing</u> are amongst the factors that have contributed to the borough being one of the least affordable areas of the country, outside of London, to live in.
Definitions	<p><b><u>Definitions</u></b></p> <p><u>4.2.33a</u> 'Designated Rural Areas' are rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks, Areas of Outstanding Natural Beauty and other areas designated by order of the Secretary of State as a rural area. These are areas designated as rural by the Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the South East) Order 1997 or as Designated Protected Areas by the Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 (Statutory Instrument 2009 No. 2098). Within Guildford borough, they include the following parishes: Albury, East Clandon, Effingham, Normandy, Ockham, Pirbright, Puttenham, Ripley, Seale and Sands, Shackleford, Shalford, Shere, Wanborough, West Clandon, West Horsley (as defined on map available from the Homes and Communities Agency – see <a href="https://www.gov.uk/government/publications/designated-protected-areas">https://www.gov.uk/government/publications/designated-protected-areas</a>) and Wisley.</p>
Reasoned Justification	<p>4.2.36 <u>Other than where specified in Policy H2</u>, Affordable housing should be provided on the development site in order to contribute towards mixed communities. [...]</p> <p>[...]</p> <p>4.2.42 In calculating the number of affordable homes to be provided on a site, fractions of homes will sometimes be required. In order to avoid requirements for fractions of homes we will therefore round up any part requirement of an affordable housing dwelling in line with common convention at 0.5 of a home, and down at 0.4<u>9</u> or less.</p> <p><u>4.2.43</u> A replacement home, as part of a development scheme, would count when determining whether the scheme meets the minimum threshold for which an affordable housing contribution is required, although would not count when calculating the number of affordable units needed.</p>

Paragraph or	Proposed Modification												
Key Evidence	<ul style="list-style-type: none"> <li>• <del>Guildford Local Plan Viability and Affordable Housing Study (Guildford Borough Council, 2014)</del></li> <li>• <a href="#">Local Plan and CIL Viability Study (Guildford Borough Council, 2016)</a></li> <li>• <a href="#">Local Plan Viability Update (Guildford Borough Council, 2017)</a></li> </ul>												
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<b>Policy H3: Rural Exception Homes</b>	
Footnote to Policy paragraph (1)	<sup>16</sup> <u>The planning policy definition of gypsies and travellers is set out in Planning Policy for Traveller Sites 2015: Annex 1 Glossary.</u>
Footnote to Policy paragraph (2)(b)	<sup>17</sup> <u>This is the minimum land value likely to trigger an owner to sell the land.</u>
Reasoned Justification	4.2.47 [...] In the <del>villages and</del> parishes listed in the legislation we can secure rural exception housing in perpetuity, secured by planning obligation. [...]
Reasoned Justification	4.2.50 [...] Developers may also carry out their own surveys, provided these are verified by the Council and the Rural Housing Enabler. <del>The need for affordable pitches for Travellers' accommodation is reported in Guildford's Traveller Accommodation Assessment 2013.</del>
Footnote to paragraph 4.2.47	<sup>18</sup> This is because they are not designated as "rural areas" by the Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the South East) Order 1997 ( <u>Statutory Instrument 1997 No. 625</u> ), or as <u>Designated Protected Areas by the Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 (Statutory Instrument 2009 No. 2098)</u> . East Horsley and Send therefore are not exempt from the right to acquire or right to enfranchise, and so affordable housing cannot automatically be secured in perpetuity <u>through the legislation</u> . [...]
Reasoned Justification	4.2.53 [...] Where agreement cannot be reached, external consultants will be appointed at the developer's cost to provide an independent assessment of the scheme's viability. <del>Any market housing must improve the mix of market housing in the village, and must be integrated into the rural exception development.</del>

Paragraph or Section	Proposed Modification
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<b>Policy P1: Surrey Hills Area of Outstanding Natural Beauty</b>	
Policy	<p>(1) The Surrey Hills Area of Outstanding Natural Beauty (AONB), as <del>designated</del><u>shown</u> on the Policies Map, will be conserved and enhanced to maximise its special landscape qualities and scenic beauty.</p> <p>(2) In accordance with <del>the NPPF national planning policy</del>, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest.</p> <p>(3) <del>High priority</del><u>Great weight</u> will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting.</p>
Reasoned Justification	<p>4.3.6 In considering major applications in the AONB, the Council will have regard to the criteria outlined in Paragraph <del>172-116</del> of the NPPF. Whether a proposal constitutes ‘major development’ will be considered on a case-by-case basis, taking into account relevant factors such as the <del>nature</del><u>size</u>, scale and setting of the proposed development, <del>and whether it could have a significant adverse impact on the purposes for which the area has been designated.</del></p>
Reasoned Justification	<p>4.3.8 Natural England has subsequently agreed to undertake a review of the AONB boundary and will consider further evidence presented to them. A date has not yet been set for the commencement of the review but the work is included within Natural England’s current work programme. Prior to the completion of the review, the identified candidate areas will <del>retain their current status as AGLV</del><u>not be given any greater status than their current AGLV designation.</u></p>

Paragraph or Section	Proposed Modification
<b>Policy P2: Green Belt</b>	
Introduction	4.3.13 The following villages are <del>now inset from</del> <u>no longer washed over by</u> the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, West Horsley and Wood Street Village.
Introduction	4.3.17 Whilst the general extent of the Green Belt has been retained, land has been removed from the Green Belt in order to enable development around Guildford urban area, selected villages, and at the former Wisley airfield. <del>The Green Belt boundary has also been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence.</del>
Policy Criterion (c)	iii. Limited infilling may also be appropriate <del>and</del> in the following villages, where it can be demonstrated that the site should be considered to be within the village:
Reasoned Justification	<p><b>Reasoned justification</b></p> <p>4.3.18 Whilst most forms of development are considered inappropriate in the Green Belt, <del>national planning policy</del> <u>the NPPF</u> lists certain exceptions which are not inappropriate. These are set out in paragraphs <del>89-145</del> and <del>90-146</del> of the National Planning Policy Framework. The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land subject to the impact on the openness of the Green Belt.</p> <p>4.3.19 <del>Further clarification is provided below in relation to extensions or alterations of buildings, replacement buildings and limited infilling. We will also prepare a Green Belt Supplementary Planning Document (SPD) which will provide further detail and guidelines to help inform development proposals. In assessing proposals, account will be taken of the forthcoming Green Belt Supplementary Planning Document (SPD), which will be prepared to support this policy. This will set out guidelines and considerations that the Council will take into account when assessing Green Belt planning applications. This will help provide greater clarity to any applicants.</del></p>

Paragraph or Section	Proposed Modification
	<p style="text-align: center;"><del><b>Extensions or alterations</b></del></p> <p><del>4.3.20 In assessing whether an extension or alteration is disproportionate, account will be taken of the forthcoming Green Belt Supplementary Planning Document (SPD), which will be prepared to support this policy. This will set out guidelines including guidance on the scale of development that the Council is likely to consider appropriate and how this will be calculated. This will help provide greater clarity to any applicants wishing to extend their homes although any guideline figures therein would still need to be considered in relation to other design criteria.</del></p> <p>[...]</p> <p style="text-align: center;"><del><b>Replacement buildings</b></del></p> <p><del>4.3.22 In assessing whether the replacement building is materially larger, account will also be taken of the forthcoming Green Belt Supplementary Planning Document (SPD) which will provide guidance on the scale of development which is likely to be considered appropriate.</del></p>
Reasoned Justification	<p><b>Limited infilling</b></p> <p>4.3.24 Development within villages in the Green Belt is limited to small scale infilling. This reflects the need to protect the openness of the Green Belt. Case law has now established that <del>this exception-limited infilling</del> is applicable to all villages and not restricted to sites that fall within identified settlement boundaries in local plans. Instead, the decision-maker is required to consider whether the site is, <del>as a matter of fact,</del> <u>located</u> within the village, <u>identified boundaries being at most a relevant consideration. The policy defines, and applies to, all those settlements in the borough which are considered to be villages and in which limited infilling may therefore be appropriate.</u></p>
<b>P3: Countryside</b>	
Introduction	<p>4.3.31 The remaining land designated as countryside on the Policies Map lies immediately to the west and south of the urban area. <del>It and</del> forms the <del>natural</del> boundary of the Blackwater Valley <del>to the west and the A31 to the south</del>. The Blackwater Valley contains the A331, which connects the A31 and Tongham in the south with Ash Vale in the north and Frimley beyond. It also provides an important open gap between Ash and Tongham, and the town of Aldershot to the west.</p>

Paragraph or Section	Proposed Modification
Introduction	<p><u>4.3.32a It also covers the area of land between the extended Ash and Tongham urban area and Ash Green village. This provides an important anti-coalescence role that prevents further merging between the Ash and Tongham urban area and Ash Green village.</u></p>
<p><b>P4: Flooding, flood risk and groundwater protection zones</b></p>	
Introduction	<p>4.3.36 To fulfil its statutory obligations under the Flood and Water Management Act <u>(2010)</u> and contribute to the achievement of sustainable development, the County Council is required to produce a Local Flood Risk Management Strategy and engage with Risk Management Authorities, including Guildford Borough Council, <u>the Environment Agency and Thames Water</u>, <del>with regard in regards</del> to flood risk management.</p> <p>4.3.37 The River Wey and various other watercourses pass through the borough and have contributed to localised flood events in the recent past, including within Guildford town centre. Nationally, flood events have become increasingly frequent and severe. Such trends are likely to continue <del>elsewhere and</del> within the borough <u>and elsewhere, increasing</u> as a result of climate change. The NPPF requires Local Planning Authorities to take account of climate change, including factors such as flood risk, through the preparation of their Local Plans. New development should be carefully planned to ensure that vulnerability to the range of impacts associated with climate change is not increased.</p>
Footnote to para 4.3.42	<p><sup>20</sup> <u>For the most up-to-date information on groundwater sources, see the Environment Agency's protection position statements: <a href="http://www.gov.uk/government/publications/groundwater-protection-position-statements">http://www.gov.uk/government/publications/groundwater-protection-position-statements</a>.</u></p>
Reasoned Justification	<p>4.3.44 Within each flood zone new development should be directed to areas of lowest risk first and, following this, to areas suited to the vulnerability of the proposed use. Land-uses considered to be most vulnerable to flooding must be located in areas of lowest flood risk first unless <del>it can be shown that there are there are demonstrated to be</del> overriding reasons to prefer a different location. NPPG will be referred to when assessing the vulnerability of a land use to flood risk. Its definition of 'essential infrastructure' will also be utilised in assessing planning applications in the undeveloped functional floodplain.</p>

Paragraph or Section	Proposed Modification
Reasoned Justification	4.3.48 Sustainable Drainage Systems (SuDS) should be provided on all new development unless it can be demonstrated that such measures are inappropriate and suitable alternative drainage mechanisms are proposed. Drainage systems higher in the SuDS hierarchy, as defined by NPPG, will be favoured. However, to ensure effective use over their life course, the Council will require appropriate funding to implement management and maintenance requirements <u>for any proposed drainage mechanism or other system of water management</u> . Applicants should also demonstrate that they have taken <u>into account</u> <del>regard to</del> relevant recommendations of the Guildford Surface Water Management Plan or Ash Surface Water Study.
<b>Policy P5: Thames Basin Heaths Special Protection Area</b>	
Definitions; Zone of Influence	4.3.54 [...] Proposals for student accommodation, <u>care homes</u> and other types of permanent accommodation not listed in paragraph 4.3.51 may not need to provide avoidance and mitigation measures. [...]
Definitions; New dwellings that do not require planning permission	4.3.56 [...] Where avoidance and/or mitigation measures are required, these should be provided in line with the approach set out in this policy and <del>the Thames Basin Heaths Special Protection Area Avoidance Strategy</del> (the strategy). [...]
Definitions; Strategic Access Management and Monitoring (SAMM)	4.3.62 SAMM refers to measures undertaken on the SPA to reduce the impact of visitors and monitoring of both visitors and bird populations. Access management measures are provided strategically across the whole SPA to ensure that adverse impacts are avoided and that SANGs function effectively. <del>This is</del> <u>These are</u> funded through developer contributions and <del>coordinated by Natural England in partnership with</del> <u>delivered by</u> landowners and other stakeholders. <u>Natural England acts as host to the SAMM project.</u>

Paragraph or Section	Proposed Modification
<b>Policy E1: Meeting Employment Needs</b>	
Introduction	<p><b>Employment needs</b></p> <p>4.4.1 The NPPF states that one of the roles of the planning system is to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, <del>and innovation</del> <u>and improved productivity</u>. It goes on to say local planning authorities should <del>plan positively and proactively to meet the development needs of business and support an economy fit for the 21st century help create the conditions in which businesses can invest, expand and adapt.</del></p>
	<p><b><u>Retail needs</u></b></p> <p><u>4.4.5a Guildford town centre is a highly successful destination for shopping, which ranked 11 in the top 500 British retail centres for vitality in 2014 and second among the top five centres in the South East. It scored 29 in the Javelin VenueScore centre 2016 rankings, an improvement from 32 in 2014. The centre has also proven to be one of the most economically resilient in the country in times of economic downturn<sup>21</sup>, primarily due to its largely affluent population and attractive environment.</u></p> <p><u>4.4.5b Nevertheless, centres are constantly changing. As nearby similar sized centres such as Kingston upon Thames and Woking improve, so must Guildford town centre. As well as providing for shopping and employment needs, we must also improve the overall experience for visitors. Improvements may include a focus on leisure and other town centre uses that encourage people to visit, reducing the dominance of traffic congestion and surface car parks, and enhancements to the riverside, buildings and public spaces between them.</u></p> <p><u>4.4.5c We will work with our partners to deliver the Local Plan, and to progress further opportunities highlighted in the Guildford Town Centre Regeneration Strategy. Partners include Experience Guildford (Guildford's Business Improvement District), major land- owners including the North Street Regeneration site, Surrey Country Council as local highway authority, the Environment Agency, and the National Trust as owner of the River Wey.</u></p> <p><u>4.4.5d The preference is to locate new retail proposals on town centre sites, to make most effective use of these sites and ensure the town centre's continued economic performance and vitality in line with the NPPF. Policies E7-E9 deal with proposals for new retail and leisure developments and with proposals involving a loss of existing retail (A1) and other</u></p>

Paragraph or Section	Proposed Modification
	<p><u>A-class uses from primary and secondary shopping frontages and district and local centres. As the most accessible location in the borough, Guildford town centre is the most suitable location for larger, mixed-use developments including retail and housing. Large-scale retail schemes will be located, wherever possible, within the Primary Shopping Area (PSA). The boundary of Guildford town centre, its PSA and ground floor primary and secondary shopping frontages are illustrated on the Policies Map. The shopping frontages are also listed in Appendix B.</u></p> <p><u>4.4.5e The borough-wide targets for retail and employment needs are set out in Policy E1 below:</u></p> <p>_____</p> <p><u><sup>21</sup> Second most credit crunch resistant retail centre in the UK (Source: CACI Retail Footprint Study 2010/11)</u></p>
Footnote to table following policy paragraph (1a)	<p><u><sup>23</sup> Note that convenience retail need arising from development on the mixed-use strategic sites allocated in the Plan (A25, A26 and A35) is additional to the identified overall borough-wide need and is shown separately in the Retail and Leisure Study Update 2014 (see Para. 7.71, Table 7.5).</u></p>
Definitions	<p><b>Definitions</b></p> <p><del>4.4.6 The Strategic Employment Sites were identified in the ELNA. The sites are all larger than 1.5 ha and all have at least 7,000 sq m of employment floorspace, most have more than 10,000 sq m of floorspace. Together the sites make up more than 170 ha of employment land and more than 500,000 sq m of employment floorspace.</del></p> <p><del>4.4.7 The identified Locally Significant Employment Sites listed in the above policy are shown on the Proposals Map however the list is not exhaustive. All sites which meet the definition will be classified as Locally Significant Employment Sites. The sites were identified from the non-strategic sites in the ELNA and local knowledge. They are single buildings of approximately 3,000 sq m or greater, clusters of two or more buildings in the urban area or rural clusters, which are important to retain to support the rural economy.</del></p>
Reasoned justification	<p><del>4.4.11 The need to renew and refurbish employment floorspace, especially office space, is imperative if the borough is to retain existing occupiers and compete effectively for new occupiers looking to locate in the area. There is a particular need for grade A (the best office space) and good quality second-hand floorspace.</del></p>

Paragraph or Section	Proposed Modification
Reasoned Justification	<p><u>4.4.11b</u>The Guildford Retail and Leisure Study Addendum (2017) provides the latest figures for the need (capacity) for retail and leisure floorspace for the borough as a whole, and for Guildford town centre, up to and beyond 2034, the end date of the Local Plan. The study used 2014-based ONS Sub National Population Projections and data on expenditure and retail sales growth based on national data and a household survey. The market shares that informed the previous 2014 Retail and Leisure Study Update were adjusted in the 2017 study to take account of new store openings and committed new retail schemes. The figures also take into account changes in special forms of trading (SFT), such as increased proportion of expenditure on internet sales.</p> <p><u>4.4.11c</u>The anticipated proportion of retail sales via the internet is increasing nationally, and mobile phone retailing is growing. It is becoming increasingly clear that the successful large ‘bricks and mortar’ retailers are increasingly becoming multi-channel retailers (selling both in store and online), which is both changing, and being influenced by, people’s shopping habits. To ensure the continued success of the town centre’s economy in future, it will be necessary to monitor the impact of these trends and to take account of market signals and up-to-date local evidence on retail needs.</p> <p><u>4.4.11d</u>The retail and leisure study acknowledges the volatility of retail markets and the difficulty of long-term capacity forecasting due to the impact of economic, demographic and market trends on longer-term assumptions and forecasts. The Plan therefore seeks to meet the borough’s retail needs to 2030, rather than to the end of the Local Plan period, though still takes account of forecast growth over the longer term. For the same reason, the Plan’s North Street allocation wording has been made flexible to allow for variation in the retail floorspace requirement to take account of changes to retail need highlighted in future updates of the study.</p> <p><u>4.411e</u> The headline figures for comparison retail need (gross floorspace), assuming Guildford town centre retains a constant market share, are 1,614 sq m to 2020; 15,664 sq m to 2025; 40,289 sq m to 2030 and 46,664 sq m to 2034. These figures are cumulative. The vast majority of the comparison floorspace will be provided in one development, on the site fronting North Street (site allocation A6). This site presents a rare opportunity to provide a significant amount of new retail, food and drink, and leisure floorspace all on one centrally-located and well-linked site, alongside new flats and improvements to the environment and appearance of this area.</p>
Reasoned justification	<p><u>4.4.13</u> Implementation of this policy will be via the development management process.</p>

Paragraph or Section	Proposed Modification											
Key evidence	<ul style="list-style-type: none"> <li>• <a href="#">Retail and Leisure Study Update 2014 (Guildford Borough Council, 2015) and Addendum 2017</a></li> <li>• <a href="#">The Guildford Town Centre Regeneration Strategy (Guildford Borough Council, 2017)</a></li> <li>• <a href="#">Guildford Borough Corporate Plan 2018 – 2023 (Guildford Borough Council, 2018)</a></li> </ul>											
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Paragraph or Section	Proposed Modification
<b>Policy E2: Location for new employment floorspace</b>	
Introduction	<p>4.4.14 The NPPF states planning policies should <del>promote competitive town centre environments and set out policies for the management and growth of centres over the plan period</del><u>support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation</u>. Guildford town centre is the preferred location for new office and research &amp; development floorspace due to its size and transport links. There is currently a limited supply of sites in the town centre for new employment floorspace but this may change over the plan period and remains the most sequentially preferable location. Industrial, warehousing and storage uses are generally less compatible with residential development and due to the larger vehicles needed are often best located with good access to the road network.</p>
Policy	<p><u>(0a) The Plan aims to ensure sustainable employment development patterns, promote smart growth (see glossary) and business competitiveness, and allow flexibility to cater for the changing needs of the economy.</u></p> <p><u>(0b) The following will be supported:</u></p> <ul style="list-style-type: none"> <li><u>(a) the retention, creation and development of small local business by encouraging a range of types and sizes of new premises including incubator units, managed workspace and serviced office accommodation</u></li> <li><u>(b) the provision of essential ancillary employment facilities close to places of employment</u></li> <li><u>(c) rural economic development opportunities</u></li> <li><u>(d) proposals which come forward to redevelop outmoded employment floor space and cater for modern business needs.</u></li> </ul>
Definitions	<p>4.4.18 The bus station in Guildford town centre is defined as a public transport interchange. When it is replaced <del>on-site or</del> by a suitable alternative arrangement to be located either partly or wholly on or off site this will be defined as a public transport interchange.</p>

Paragraph or Section	Proposed Modification											
Reasoned Justification	4.4.23 <del>The need to renew and refurbish employment floorspace, especially office space, is imperative.</del> To ensure the supply of premises is suitable for modern business needs, <del>renewal including redevelopment of existing offices is encouraged, and</del> the borough is <u>able</u> to retain existing occupiers and compete effectively for new occupiers looking to locate in the area. There is currently need for grade A and good quality grade B premises. <del>There is a particular need for grade A (the best office space) and good quality second-hand floorspace.</del> This will be particularly encouraged in the most sustainable locations in terms of public transport accessibility.											
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Paragraph or Section	Proposed Modification
<b>Policy E3: Maintaining employment capacity and improving employment floorspace</b>	
Introduction	<p><u>4.4.25a Sufficient land has not been identified within the urban area to meet the employment land requirements so it has been necessary to allocate new employment sites. There needs to be a degree of choice and flexibility of floor space to ensure that the local property market can operate efficiently and allow businesses in the borough to grow. If enough suitable land, choice and flexibility are not provided, the Local Plan may not meet the needs of the borough's businesses. In time, this could lead to existing businesses moving out of the borough and new and small businesses not being able to establish themselves or invest in the borough. The retention of existing and the creation of new incubator and move-on units is key to supporting new businesses in the borough and helping existing small businesses to thrive. A priority in our economic strategy is to increase the amount of incubator and start-up space for new and emerging SMEs.</u></p>
Policy	<p>(0e) When developed, the new employment land at Burnt Common <u>(site allocation A45)</u>, together with the existing employment floorspace, will be treated as an Industrial Strategic Employment Site.</p> <p>[...]</p> <p>(0g) When developed, the new industrial employment land on the west side of the Former Wisley Airfield <u>(site allocation A35)</u>, will be treated as a Locally Significant Employment Site.</p>
Definitions	<p>4.4.29 <u>The Strategic Employment Sites and Locally Significant Employment Sites were identified in the ELNA. are identified in policy E1 and on the Policies Map. The sites are all larger than 1.5 ha and all have at least 7,000 sq m of employment floorspace, most have more than 10,000 sq m of floorspace. Together the sites make up more than 170 ha of employment land and more than 500,000 sq m of employment floorspace.</u></p> <p><u>4.4.29a The identified Locally Significant Employment Sites listed in the above policy are shown on the Policies Map however the list is not exhaustive. All sites which meet the definition will be classified as Locally Significant Employment Sites. The sites were identified from the non-strategic sites in the ELNA and local knowledge. They are single buildings of approximately 3,000 sq m or greater, clusters of two or more buildings in the urban area or rural clusters, which are important to retain to support the rural economy.</u></p>

Paragraph or Section	Proposed Modification									
Reasoned justification	<p>4.4.31 Policy E3 seeks to sustain and enhance employment in the borough through the protection of sites as set out in the policy. It aims to protect employment floorspace to ensure there is sufficient supply to accommodate existing and future need. <del>As set out above, the new Local Plan seeks to protect existing major employment sites and protect its locally strategic employment sites to comply with the NPPF. Loss of these sites to alternative uses runs the risk of constraining employment growth and limiting economic diversification.</del> As set out in the policy a more flexible approach will be applied to the change of use in locations outside town centres and key existing employment locations, however as a significant number of sites are being lost through permitted development, the policy seeks to ensure existing and future need is accommodated.</p>									
Reasoned justification	<p><del>4.4.32a Three of the Strategic Employment Sites (The Pirbright Institute, Lysons Avenue, Ash Vale and Henley Business Park, Normandy) have been identified as having land which falls within 400m of the SPA. Two of the Public Transport Interchanges (Ash and Ash Vale stations) have been identified as having land which falls within 400m of the SPA. Development on these sites which falls within the 400m exclusion zone (as defined in Policy P5) will require a project-level HRA.</del></p> <p><del>4.4.33 The policy will be implemented via the development management process.</del></p>									
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<b>Monitoring Indicators</b>										
<b>Indicator</b>	<b>Target</b>	<b>Data source</b>								
Net change in permitted and completed B1 (a, b, c), B2 and B8 <del>floor space (sq m)</del> in the borough, Strategic Employment Sites and Locally Significant Employment Sites	Net increase of 36,100 - 43,700 sq m B1a and B1b use class floorspace to 2034 in the borough  Net increase of Industrial land (B1c, B2 and B8) of 3.7 – 4.1ha to 2034 in the borough	Planning applications and appeals and building completions data								

Paragraph or Section	Proposed Modification
<b>Policy E4: Surrey Research Park</b>	
Introduction	<p>4.4.34 The NPPF <del>requires planning authorities to plan proactively to meet the development needs of business and support an economy fit for the 21st-century</del> <u>states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It goes on to say that the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.</u> Paragraph <del>2482</del> requires the Council to <del>“support existing business sectors” and to “plan positively for the location, promotion and expansion of</del> <u>make provision for</u> clusters or networks of knowledge <u>and data-</u>driven, creative or high technology industries”.</p>
<b>Policy E5: Rural Economy</b>	
Introduction	<p>4.4.43 The NPPF states that planning policies should support <del>economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development, which includes economic, social and environmental dimensions</del> <u>a prosperous rural economy that enables the sustainable growth and expansion of all types of business in rural areas.</u></p>
Key evidence	<ul style="list-style-type: none"> <li>• Guildford Borough Corporate <del>Strategy Plan 20185 – 20230</del> (Guildford Borough Council, 201 <del>86-update</del>)</li> <li>• Guildford Borough Rural Economic Strategy 2017-2022 (Guildford Borough Council, 2017)</li> <li>• <del>Surrey Rural Strategy 2010 – 2015, (Surrey Rural Partnership, 2010)</del></li> <li>• <u>A Rural Statement for Surrey (Surrey Countryside and Rural Enterprise Forum, 2016)</u></li> </ul>

Paragraph or Section	Proposed Modification
<b>Policy E6: The leisure and visitor experience</b>	
Introduction	4.4.54 Many of the borough’s entertainment and cultural activities are concentrated within central Guildford; the area offering a mix of shops, restaurants, performance venues, galleries and attractions including the Guildhall, Guildford Castle, Yvonne Arnaud Theatre, G Live, <u>Electric Theatre</u> and Guildford Museum...
Reasoned Justification	4.4.61 Proposals for new visitor and business accommodation and other leisure and tourism uses on unallocated land will be required to adhere to the sequential test outlined in the NPPF. This means that new facilities will be encouraged to locate in our town and district centres. If there are not any town centre sites available, edge of centre locations may be considered. Only if there are not any town centre or edge of centre sites available will out-of-centre locations be <del>accepted</del> <u>considered</u> . Applicants proposing new leisure uses outside the town or district centres will be required to submit an impact assessment if the additional leisure floorspace exceeds 500 sq m. The assessment should clearly identify and explain the proposed development’s likely impact on the vitality and viability of the town or district centre.
<b>Policy E7: Guildford Town Centre</b>	
Policy title	<b>Policy E7: <u>Retail and leisure uses in</u> Guildford Town Centre</b>
Introduction; including attached footnote	<p><del>4.4.69 Guildford town centre is lively and economically resilient. It has proved to be one of the most resilient centres in the country in times of economic downturn<sup>2</sup>, primarily due to its largely affluent catchment population and attractive environment.</del></p> <hr/> <p><del><sup>2</sup>Second most credit crunch resistant retail centre in the UK (Source: CACI Retail Footprint Study 2010/11)</del></p>

Paragraph or Section	Proposed Modification
Introduction	<p><del>4.4.74 The role of Guildford town centre as the key retail and service centre for Surrey county will be reinforced, and it will become a more attractive place to live, to visit and to work in. We will ensure the public realm is enhanced and insist that all new development will be of the highest design and environmental standards. We will also take opportunities to reconnect the town centre to the amenity of the riverside.</del></p>
Policy	<p><del>(1) By 2034, Guildford town centre will have:</del></p> <ul style="list-style-type: none"> <li><del>• a new retail-led, mixed-use development of 41,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site within its primary shopping area.</del></li> <li><del>• developments of other town centre uses that contribute to the liveliness of the town centre including food and drink, more gyms and cinema screens;</del></li> <li><del>• approximately 1,300 new homes, particularly on upper floors as part of mixed use developments.;</del></li> </ul> <p><b><u>Proposals for new retail and main town centre leisure uses</u></b></p> <p><del>(1) In order to strengthen the liveliness and economic resilience of Guildford town centre, new retail and leisure uses located within the centre will be supported. Where no suitable sites are available within the centre, sites on the edge of the centre will be considered.</del></p>
Policy	<p><b><u>Proposals for loss of A1 retail and other Class A uses</u></b></p> <p>(3) Within the Primary Shopping Frontage as defined on the Policies Map proposals for change of use of existing ground floor shops (Class A1) to other uses will not be permitted.</p>

Paragraph or Section	Proposed Modification											
Reasoned justification	<p><del>4.4.84 Consumer habits are changing and to be a successful town centre in the future will involve strengthening the retail offer and diversifying to include other town centre uses. The town centre will become more important as a focus for our leisure time, and the enhancement of the riverside, buildings and public spaces between them will contribute to this diversification.</del></p> <p>4.4.85 National planning policy sets out two tests for applications for certain main town centre uses <u>that are not in a centre and not allocated in this Local Plan. These are</u> the sequential and retail impact tests. In considering proposed developments of any main town centre use on sites outside of designated centres that are not allocated for such uses, the sequential test must be applied. Retail and leisure proposals over 500 sq m on unallocated land outside of designated centres must be accompanied by an impact assessment. This will help to preserve the liveliness of our centres, and to protect them from significant adverse impacts from new retail and leisure developments in less suitable locations.</p>											
Monitoring Indicators	<table border="1"> <thead> <tr> <th data-bbox="421 767 958 807">Indicator</th> <th data-bbox="958 767 1503 807">Target</th> <th data-bbox="1503 767 2040 807">Data source</th> </tr> </thead> <tbody> <tr> <td data-bbox="421 807 958 911">Number of ground floor retail (A1) uses lost to other use classes within the Primary Shopping Frontage</td> <td data-bbox="958 807 1503 911"><u>N/A</u></td> <td data-bbox="1503 807 2040 911"><u>Town centre retail surveys</u></td> </tr> <tr> <td data-bbox="421 911 958 1222"><u>Number of applications approved in the Secondary Shopping Frontage that would result in more than two permitted ground floor non-retail uses (A1) adjacent to each other or more than one third of the defined street level frontage (as defined in Appendix B) in permitted non-A1 use.</u></td> <td data-bbox="958 911 1503 1222"><u>None</u></td> <td data-bbox="1503 911 2040 1222"><u>Town centre retail surveys and planning applications</u></td> </tr> </tbody> </table>			Indicator	Target	Data source	Number of ground floor retail (A1) uses lost to other use classes within the Primary Shopping Frontage	<u>N/A</u>	<u>Town centre retail surveys</u>	<u>Number of applications approved in the Secondary Shopping Frontage that would result in more than two permitted ground floor non-retail uses (A1) adjacent to each other or more than one third of the defined street level frontage (as defined in Appendix B) in permitted non-A1 use.</u>	<u>None</u>	<u>Town centre retail surveys and planning applications</u>
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Paragraph or Section	Proposed Modification
<b>Policy E8: District Centres</b>	
Policy	<p><b><u>Proposals for new retail and main town centre uses</u></b></p> <p>(3) In order to strengthen the liveliness and economic resilience of the borough's District Centres, retail and other main town centre use development located within the centre and consistent with the scale and function of that centre will be supported. Where no suitable sites are available within the centre, sites on the edge of designated centres will be considered. We will not apply this sequential approach to proposals for town centre uses of less than 100 sq m (gross) in rural areas.</p>
Policy	<p><b><u>Proposals for loss of A1 retail and other Class A uses</u></b></p> <p>(6) Within the District Centres shown on the Policies Map, proposals for change of use of an A1 retail use at ground floor to another A Class use will be permitted where all of the following criteria are met:</p>
Policy	<p>(9) Residential (Class C) uses and offices within the B1 Use Class are not considered to be suitable main town centre uses for the ground floor level of a District Centre <del>Primary Shopping Area.</del></p>
Definitions	<p><b><u>4.4.87e District Centres comprise at least 30 non-residential units, including a supermarket and local services such as a bank, and public and community facilities such as a meeting hall.</u></b></p>
Key evidence	<ul style="list-style-type: none"> <li>• <del>Guildford Retail and Leisure Study Update 2014 (Guildford Borough Council, 2015) and Addendum 2017</del></li> <li>• Guildford Borough Council land use surveys, <del>to 2016</del></li> </ul>

Paragraph or Section	Proposed Modification
<b>Policy E9: Local centres and isolated retail units</b>	
Policy	<p><b><u>Proposals for new retail and main town centre uses</u></b></p> <p>(5) In order to strengthen the liveliness and economic resilience of the borough's Local Centres, proposals for retail and other main town centre uses consistent with the scale and function of that centre will be supported. Where no suitable sites are available within the centre, sites on the edge of designated centres will be considered. We will not apply this sequential approach to small-scale development proposals for main town centre uses in rural areas.</p>
Policy	<p><b><u>Proposals for loss of A1 retail and other Class A uses</u></b></p> <p>(8) Within the Local Centres shown on the Policies Map, proposals for change of use of an A1 retail use at ground floor to another A Class use will be permitted where all of the following criteria are met:</p>
Key evidence	<ul style="list-style-type: none"> <li>• <del>Guildford Retail and Leisure Study Update 2014 (Guildford Borough Council, 2015) and Addendum 2017</del></li> <li>• Guildford Borough Council land use surveys, <del>to 2016</del></li> </ul>

Paragraph or Section	Proposed Modification
<b>Policy D1: Place Shaping</b>	
Introduction	<p>4.5.2 The NPPF <del>states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. attaches great importance to the design of the built environment and states that good design should contribute positively to making places better for people.</del> Urban design and architecture can contribute to health outcomes through encouragement of more active lifestyles. Development should be encouraged to create places that create mixed communities catering for the needs of different types of people, including the young and old, encourage walking and cycling, improve access to public transport, and ensure that new development connects with existing parks and open spaces for recreation. Building exteriors and public realm should be designed in a way that contributes to pedestrian friendly environments.</p> <p>4.5.3 We need to accommodate growth over the plan period including the provision of <del>adequate</del> <u>sufficient</u> residential and economic development <del>in order to meet identified needs</del> as outlined elsewhere in this Plan.</p> <p>4.5.4 It will be important to ensure that new housing and employment areas are designed to respect the existing character of the borough, and create great places for people to live in or use. <del>The development of the strategic sites offers the opportunity of creating their</del> <u>own identity and character.</u></p>
Definitions	<p><del>4.5.6 Local landmarks are prominent buildings within the village such as churches, village schools, public houses and war memorials. This is not an exhaustive list and does not exclude other buildings being referred to as local landmarks as it will differ between villages. Accessible places are those where the public would reasonably have access and which make provision for safe and convenient access by people with disabilities.</del></p>
Reasoned Justification	<p>4.5.7 It is important <del>at this strategic stage in the local planning process</del> that we set out how we will plan positively to achieve very high quality <del>and inclusive</del> design for all developments. <del>National planning policy</del> <u>The NPPF</u> requires the inclusion of a robust policy for design quality, <del>ultimately the NPPF gives local planning authorities the power to and states that permission should be</del> <u>refused for</u> development of poor design that fails to take opportunities available for improving the character and quality of an area and the way it functions. This policy forms the strategic element with</p>

Paragraph or Section	Proposed Modification
	<p>more detailed policy to follow as we <del>prepare the Development Management Policies DPD</del> <del>form the development control policies.</del></p> <p>4.5.8 We want to create places that we can be proud of, that are inclusive and promote community and healthy living. We are keen to encourage a mix of uses, particularly on larger sites, but also on smaller sites. This provides the potential to create places where services and facilities are readily accessible to residents, in particular through walking or cycling. We <del>are keen to see</del> <u>want to create</u> places that allow access to facilities and support the use of sustainable modes of transport.</p> <p>4.5.8a <del>Access to an efficient broadband connection is crucial for residents to efficiently go about day-to-day activities. It also stimulates economic growth and enables digital inclusion of vulnerable communities along with improving access to education facilities and improving the skills base. It further supports efforts to reduce carbon emissions by minimising the need to travel. We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design. This should include taking account of the existing grain and street patterns and established building lines, local building vernacular and considering the effects upon views, topography, natural features, skylines, landscape setting and character, and the setting of designated and non-designated heritage assets. The relationship of the built environment to the landscape must be taken into account and the transition from urban to rural character will need to be reflected in the design of new development with the green approaches to settlements respected. Balanced with this is a requirement to develop with flair, imagination and style, reflecting our position as a regional centre and County town. These design considerations will be set out in more detail in the Local Plan Development Management Policies Document DPD. This approach is not confined to our urban areas but will be appropriate applicable throughout the borough.</del></p> <p><u>4.5.8b</u> <del>Historically, development has been focused in the urban areas of Guildford and Ash and Tongham only. The Plan identifies a number of strategic sites for development and we will expect masterplans for these sites to be produced as part of the planning process.</del></p>
Key Evidence	<ul style="list-style-type: none"> <li>• <u>Secured by Design, Design Guides (Various years, available online at: <a href="http://www.securedbydesign.com/industry-advice-and-guides/">http://www.securedbydesign.com/industry-advice-and-guides/</a>)</u></li> <li>• <u>Rural Economic Strategy 2017-2022 (Guildford Borough Council, 2017)</u></li> <li>• <u>The Building Regulations 2010, Physical Infrastructure for high speed electronic communications networks, R1 In-building physical infrastructure (2016 edition)</u></li> </ul>

Paragraph or Section	Proposed Modification
<b>Policy D2: Sustainable design, construction and energy</b>	
Policy title	Policy D2: <del>Climate change, S</del> <b>ustainable design, construction and energy</b>
Introduction	<p><b>Sustainable development</b></p> <p>4.5.9 <del>The NPPF states that Achieving sustainable development means that plans should secure net gains achieving growth while “ensuring that better lives for ourselves don’t mean worse lives for future generations” within economic, social and environmental objectives (NPPF, paragraph 8). Environmental objectives include using natural resources prudently, minimising waste, mitigating and adapting to climate change and moving to a low carbon economy. In environmental terms, this means taking into account the impact of our consumption patterns on the environment’s ability to provide both for ourselves and for future generations, and living within the environmental limits of one planet. In practice, this means being careful about how much we consume, reusing materials and favouring renewable resources over finite resources.</del></p> <p>4.5.10 <del>The NPPF sets out the government’s vision of sustainable development, and highlights the key themes that should be addressed including:</del></p> <ul style="list-style-type: none"> <li><del>water supply and demand (paragraphs 94 and 99)</del></li> <li><del>minimisation of waste and pollution (paragraphs 7, 17, 109, 110, 143 and 156)</del></li> <li><del>promotion of renewable, low carbon and decentralised energy (paragraphs 93 and 97)</del></li> <li><del>the prudent use of natural resources (paragraph 7)</del></li> <li><del>radical reduction of greenhouse gas emissions and (paragraph 93), and management of the risks of climate change through suitable adaptation measures in new developments (paragraphs 14, 94, 99 and 156).</del></li> </ul> <p><b>Climate change and the low carbon economy</b></p> <p>4.5.11 <del>The NPPF identifies climate change as a key challenge for the planning system to address and requires it to assist in the movement towards a low carbon economy.</del> The South East of England is likely to face significant challenges from a changing climate and changing weather patterns. To avoid the costs associated with retrofitting and replacement, new buildings should be future proofed; suited to, and easily adaptable for, the range of climate conditions and weather patterns we are likely to see over the next century, and adaptable to new technologies. The buildings we build today are likely to be with us into the next century, so the benefits of building adaptable and <del>energy and resource</del> efficient developments will last a long time.</p>

Paragraph or Section	Proposed Modification
Introduction	<p><b><u>Resources and waste</u></b></p> <p>4.5.13 <del>The efficient use of water is a particularly important issue in our borough.</del> [...]</p>
Introduction	<p>4.5.15 Early engagement between developers and the Council to help achieve the greatest sustainability benefit is encouraged. <del>Applicants for planning permission should submit statements that set out how the requirements set out in policy D2 will be met.</del> The Council will support this work by signposting relevant advice and providing guidance through the Sustainable Design and Construction Supplementary Planning Document (SPD).</p>
Policy Criterion (1)	<p>(1) Proposals for zero carbon development are strongly supported. Applications for development, including refurbishment, conversion and extensions to existing buildings should include information setting out how sustainable design and construction practice will be incorporated including (where applicable):</p> <ul style="list-style-type: none"> <li>(a) the efficient use of mineral resources and the incorporation of a proportion of recycled and/or secondary aggregates</li> <li>(b) waste minimisation and reusing material derived from excavation and demolition</li> <li>(c) the use of landform, layout, building orientation, massing and landscaping to reduce energy consumption</li> <li>(d) water efficiency that meets the highest national standard and</li> <li>(e) measures that enable sustainable lifestyles for the occupants of the buildings, <u>including electric car charging points</u></li> </ul> <p>[...]</p> <p><b><u>Climate change mitigation, decentralised, rRenewable and, low carbon and decentralised energy</u></b></p> <p>[...]</p> <p>(9) New buildings must achieve a reasonable reduction in carbon emissions of at least 20 per cent <del>below measured against</del> the relevant Target Emission Rate (TER) set out in the Building Regulations 2010 (as amended) (Part L). This should be achieved through the provision of appropriate renewable and low carbon energy technologies <u>on site and/or</u> in the locality of the development and improvements to the energy performance of the building. Where it can clearly be shown that this is not possible, offsite offsetting measures in line with the energy hierarchy should be delivered.</p>

Paragraph or Section	Proposed Modification
Definitions	<p><b><u>Definitions</u></b></p> <p>4.5.16 Zero carbon development means <del>zero carbon as defined nationally. At present, this means</del> development where emissions from all regulated energy use are eliminated or offset. This definition may be reviewed in the future.</p> <p>4.5.16a <del>The definition of major development includes residential development of 10 dwellings or more (gross) and non-residential development of 1,000 sqm gross new floorspace or more.</del> Sustainability and energy statements should set out a level of detail proportionate to the scale of development.</p> <p>4.5.17 The energy and waste hierarchies set out the sequence of steps that should be followed to make development more sustainable. The sequence of steps in the hierarchies will sometimes depend upon the full life cycle approach to impacts. As an example, landfill may be preferable to energy recovery for some materials. Decisions in this regard should be based on information or guidance from a reliable and authoritative source.</p> <p><del>4.5.18 Embodied carbon means carbon dioxide emitted during the manufacture, transport and construction of materials and the end of life emissions released when materials are recycled, incinerated or otherwise disposed of. The embodied carbon in a material is often identified through a life cycle analysis.</del></p> <p><del>4.5.18a Direct carbon emissions refers to the carbon emissions that result from the construction and occupation of a development, including the emissions from building services like lighting and heating.</del></p> <p><del>4.5.18b The lowest level of carbon emissions (direct and embodied) means that direct and embodied carbon emissions have been eliminated as a first step, then minimised and finally offset.</del></p>
Definitions	<p>4.5.20 The “national standard” for water efficiency refers to any nationally described standard for water consumption in new developments. The “highest national standard” refers to the standard that has the lowest water consumption. At the present time, the highest national standard is the “optional requirement” described by regulation 36 paragraph 2(b) of the Building Regulations 2010 <u>(as amended)</u> which sets a water efficiency standard for new dwellings of 110 litres per occupant per day. [...]</p>
Definitions	<p>4.5.23 Decentralised energy means energy that is produced near where it is used, <del>rather than</del> <u>as opposed to energy produced</u> at a large plant <del>further away</del> and supplied <u>to energy users</u> through the national grid. Energy can refer to electricity and heat. 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>

Paragraph or Section	Proposed Modification
Definitions	<p><del>4.5.25 Where the policy refers to communal heating/cooling networks it means systems that distribute heating and cooling to a number of dwellings within one building but do not use (C)CHP as their source (i.e. they do not include power generation). Distribution networks mean systems that connect two or more distinct buildings. For the purposes of this policy, energy efficient heat pumps are considered to be renewable heating technologies.</del></p>
Definitions	<p>4.5.27 Sufficiently large or intensive developments are defined as any of the following:</p> <ul style="list-style-type: none"> <li>(a) residential only developments of at least 50 dwellings per hectare and/or at least 300 dwellings</li> <li>(b) residential only developments of 50 dwellings or more that are located near a significant source of heat</li> <li>(c) mixed developments of 50 dwellings or more that include either two or more non-residential uses or a single use that would generate significant amounts of heat <u>or heat demand, such as a swimming pool.</u></li> </ul>
Reasoned justification	<p>4.5.31 The NPPF <del>describes the role of</del> <u>requires the</u> <u>planning system as helping to secure</u> <u>shape places in a way that contributes to</u> “radical reductions” in greenhouse gas emissions and <u>states that helping to meet the plans should take a proactive approach to mitigating and adapting to climate change in line with the</u> objectives of the Climate Change Act 2008, which includes CO<sub>2</sub> emissions reductions targets of 34 per cent by 2020 and 80 per cent by 2050 against a 1990 baseline. The UK has a further target for generating 15 per cent of energy (including heat) from renewable sources by 2020. These national targets are ambitious so our borough’s efforts at carbon reduction and increasing renewable energy must also be ambitious.</p> <p><del>4.5.32 National policy, guidance and legislation indicates that local planning policy should focus on sustainable design while building regulations focus on technical standards. Therefore, new developments are required to implement sustainable design and construction measures that address carbon emissions, waste and climate change adaptation.</del></p>

Paragraph or Section	Proposed Modification
<b>Policy D4: Character and Design of New Development</b>	
Introduction	<p><b>Introduction</b></p> <p><del>4.5.45a One of the core planning principles of the NPPF is to always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.</del></p> <p><del>4.5.46 High quality design that responds to its local context will be required on all new development. In addition to the site allocations, it will also be required on the range of other development sites that will continue to come forward through redevelopment, infilling or conversions. Some of these sites will have been identified within the latest Land Availability Assessment (LAA), whilst some will unexpectedly come forward through the planning application process.</del></p> <p><del>4.5.47 The purpose of this policy is to ensure that whilst seeking to promote the efficient use of land, this does not negatively impact upon the quality of the local environment. All new development must contribute towards achieving high quality and attractive places.</del></p>
<b>Policy ID1: Infrastructure and Delivery</b>	
Introduction	<p>4.6.1 The timely provision of suitable, adequate infrastructure is crucial to the well-being of the borough's population, and of its economy. The Guildford borough Infrastructure Delivery Plan summarises the capacity and quality of existing infrastructure, including planned improvements. <u>The non-site specific and more general infrastructure requirements are set out in the Planning Contributions Supplementary Planning Document 2017, which will be updated as required.</u> Historically infrastructure provision and upgrading has not always kept pace with the growth of population, employment and transport demands, and in parts of the borough some infrastructure is currently at or near to capacity, or of poor quality.</p>
Policy Criterion (4)	<p>(4) <del>If appropriate, t</del>The imposition of Grampian conditions <del>should shall</del> be considered as a means to secure the provision of infrastructure when it is needed. If the timely provision of infrastructure necessary to support new development cannot be secured in line with this policy, planning permission will be refused.</p>

Paragraph or Section	Proposed Modification
Reasoned justification	<p><u>4.6.5a Through the planning system, the Council is able to ensure that there is adequate infrastructure in place to support new development. For instance, where applicable, developers will be required to demonstrate that there is adequate wastewater capacity and surface water drainage both on and off the site to serve the development, and that it would not lead to problems for existing or new users. Where there is an infrastructure capacity constraint, the Council will require the developer to set out what appropriate improvements are necessary and how they will be delivered and may use the planning system to ensure timely provision (e.g. through the imposition of Grampian-style conditions related to development phasing).</u></p>
Reasoned justification	<p>4.6.10 We will allocate a “neighbourhood” portion of our CIL funds to parish councils in accordance with national legislation. Parishes and Neighbourhood Forums that have an adopted Neighbourhood Plan will be allocated a larger proportion to spend on their priorities to support development <u>(although CIL receipts cannot be released to the latter).</u></p>
Key evidence	<ul style="list-style-type: none"> <li>• Draft Guildford borough Infrastructure Delivery Plan 2016 (Guildford Borough Council, 2016)</li> <li>• <u>Guildford borough Proposed Submission Local Plan “June 2016”</u>: Strategic Highway Assessment (Surrey County Council, 2016)</li> <li>• Local Plan <u>and CIL Viability and Affordable Housing</u> Study (Guildford Borough Council, 2016<del>4</del>)</li> <li>• <u>Local Plan Viability Update (Guildford Borough Council, 2017)</u></li> <li>• The Community Infrastructure Levy Regulations 2010, as amended</li> <li>• <u>Water Quality Assessment Stage 1 Technical Statement and Stage 2 Final Report (Guildford Borough Council, 2017)</u></li> </ul>
<b>Policy ID3: Sustainable transport for new developments</b>	
Key evidence	<ul style="list-style-type: none"> <li>• <u>A Sustainable Parking Strategy for Guildford 2016 (Guildford Borough Council, 2016)</u></li> </ul>

Paragraph or Section	Proposed Modification
<b>Policy ID4: Green and Blue Infrastructure</b>	
Introduction	4.6.31 The term green and blue infrastructure describes all green and blue spaces in and around our settlements and in the wider countryside. This includes parks and open spaces, private gardens, agricultural fields and allotments, hedges, trees and woodlands, green roofs and walls, <del>waterway</del> <u>watercourse</u> s, reservoirs and ponds. These spaces meet a range of needs including relaxation, exercise, sport and recreation, visual amenity, wildlife habitat, flood risk management and agriculture. The diversity of potential uses means that by planning for green and blue infrastructure we can make a significant contribution to wellbeing and sustainability across the social, environmental and economic dimensions.
Introduction; Blue Infrastructure	4.6.40 <del>The Water Framework Directive (WFD) requires all member states to achieve good ecological and good chemical status for all groundwater and surface-water waterbodies by 2027 at the latest.</del> <u>The Water Framework Directive (WFD) requires all member states to achieve good ecological and good chemical status for all groundwater and surface-water waterbodies by 2027 at the latest.</u> This is assessed against a set of standards including water quality (both its chemistry and biology) and river morphology (for example, preserving or restoration to a naturally meandering course, preserving floodplains and providing backwater ponds). Much of the River Wey in the borough currently achieves 'moderate' status, with some tributaries achieving only 'poor' or 'bad'. The River Wey directly upstream from the borough is largely 'poor'. The River Blackwater also largely achieves 'moderate' status, but is a tributary of the River Loddon and therefore falls within the neighbouring River Loddon catchment. This is a strategic issue due to the cross boundary nature of the impacts, and the importance of our <del>waterway</del> <u>watercourse</u> s for the ecological health of the borough. Significant pressures on the River Wey include pollution from waste water, agriculture and various sources in towns and from transport infrastructure, and the constraints to its natural function imposed by physical modifications to the river.
Policy	(5) <del>Development will not be permitted</del> <u>Permission will only be granted for development proposals</u> within or adjacent to national sites <del>unless where</del> it can be <del>shown</del> <u>demonstrated</u> that doing so would not be harmful to the nature conservation interests of the site.

Paragraph or Section	Proposed Modification											
Key evidence	<ul style="list-style-type: none"> <li>• <a href="#">Thames River Basin Management Plan (2015)</a></li> <li>• <a href="#">Water Framework Directive (2000)</a></li> <li>• <a href="#">Water Quality Assessment Stage 1 Technical Statement and Stage 2 Final Report (Guildford Borough Council, 2017)</a></li> </ul>											
Monitoring Indicators	<table border="1"> <thead> <tr> <th data-bbox="421 520 960 560">Indicator</th> <th data-bbox="960 520 1500 560">Target</th> <th data-bbox="1500 520 2045 560">Data source</th> </tr> </thead> <tbody> <tr> <td data-bbox="421 560 960 663">Amount of open space</td> <td data-bbox="960 560 1500 663">No loss of open space, identified deficits gone by 2034</td> <td data-bbox="1500 560 2045 663">Planning applications and appeals Open space, sports and recreation assessment</td> </tr> <tr> <td data-bbox="421 663 960 866">Amount of new SANG provided or funded</td> <td data-bbox="960 663 1500 866">All qualifying developments to deliver new SANG or funding for strategic SANG in line with prevailing standards Delivery of strategic SANGs identified in Infrastructure Delivery Plan</td> <td data-bbox="1500 663 2045 866">Planning applications, <del>and</del> appeals <u>and s106/CIL receipts</u></td> </tr> </tbody> </table>			Indicator	Target	Data source	Amount of open space	No loss of open space, identified deficits gone by 2034	Planning applications and appeals Open space, sports and recreation assessment	Amount of new SANG provided or funded	All qualifying developments to deliver new SANG or funding for strategic SANG in line with prevailing standards Delivery of strategic SANGs identified in Infrastructure Delivery Plan	Planning applications, <del>and</del> appeals <u>and s106/CIL receipts</u>
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Paragraph or Section	Proposed Modification
<b>Site Allocations</b>	
Multiple site allocations	Factual update, adding ' <u>SPZ1</u> ' to relevant sites where this should be a Key Consideration.
Multiple site allocations	Factual update, adding ' <u>Principal Aquifer</u> ' to relevant sites where this should be a Key Consideration.
Summary Table	Factual update, reflecting numbering changes to Site Allocation Policies, and amending the Site Capacity of A25 to 1,700 to rectify a previous error.
<b>Site Policy A6 – North Street redevelopment, Guildford</b>	
Requirements	(13) Avoid development of <del>high or medium vulnerability</del> <u>more or highly vulnerable</u> uses in flood zone 2 (medium risk) and flood zone 3 (high risk)
<b>Site Policy A7 – Land and buildings at Guildford railway station</b>	
Allocation	<p>The site is allocated for a comprehensive mixed use redevelopment to include:</p> <ul style="list-style-type: none"> <li>(1) Approximately <u>350438</u> homes (C3), and</li> <li><del>(2) Approximately 500 sq m of additional comparison retail (A1), and</del></li> <li><del>(3) Approximately 700 sq m of additional convenience retail (A1), and</del></li> <li><del>(4) Approximately 1,500 sq m food and drink (A3), and</del></li> <li><del>(5) Provision of 1 gym (D2)</del></li> </ul>

Paragraph or Section	Proposed Modification
	<p><u>(2) Approximately 2,838sqm of retail, financial &amp; professional service, food and drink and leisure (A1/A2/A3), and</u>  <u>(3) Approximately 1,635sqm of office space (B1/Sui Generis)</u></p>
Requirements	<p>(4) Site layout will be compatible with the proposals for the Sustainable Movement Corridor or, subject to timing, not compromise the future provision of the Sustainable Movement Corridor, including maintaining access along Station View access road to <u>the direct pedestrian and cycle route provided through the redevelopment of the Policy A5 site</u>  <del>the Safeguarded land for Sustainable Movement Corridor Town Centre Phase 2 site</del></p>
<b>Site Policy A8 - Land west of Guildford railway station, Guildford Park Road, Guildford</b>	
Ownership	<p><del>Guildford Borough Council</del> <u>Network Rail</u></p>
<b>Site Policy A9: Land to the rear of 77 to 83 and between 99 to 103 Walnut Tree Close, Guildford</b>	
Title	<p>A9: <u>Land to the rear of</u> 77 to 83 <u>and between 99 to 103</u> Walnut Tree Close, Guildford</p>
<b>Site Policy A22: Lane north of Keens Lane, Guildford</b>	
Requirements	<p>(1) The care home will be located within 400m of the Thames Basin Heaths SPA, subject to agreement with Natural England that it will have no <u>impact-adverse effects</u> on the <u>integrity of the</u> SPA. In order to <u>exclude-avoid adverse effects</u> <del>a likely significant effect on the interest features of the SPA:</del> [...]</p>
<b>Site Policy A23: Land north of Salt Box Road, Guildford</b>	
	<p><u>(4) Site is a proposed burial ground; special consideration is required regarding the depth to groundwater. Please refer to the Environmental Agency's Groundwater protection position statements guidance.</u></p>

Paragraph or Section	Proposed Modification
<b>Site Policy A24: Slyfield Area Regeneration Project, Guildford</b>	
Key considerations	<p>(3) The site borders a <a href="#">the River Wey</a>, Local Nature Reserve, Site of Nature Conservation Interest (SNCI) and a small area of ancient woodland</p> <p>[...]</p> <p>(9) <a href="#">SPZ1 and historic landfill on part of site</a></p>
Requirements	<p><a href="#">Infrastructure Transport strategy</a></p> <p>(1) An improved junction on the A3 comprising the relocated A3 southbound off-slip, a new A3 southbound on-slip and connection via a new roundabout to the A3100, with associated infrastructure on the A3100 corridor within Burpham</p> <p>[...]</p> <p><a href="#">Other infrastructure</a></p> <p>(9) When determining planning application(s), and attaching appropriate conditions and obligations to planning permission(s), regard will be had to the delivery and timing of delivery of the key infrastructure requirements on which the delivery of the plan depends, set out in the Infrastructure Schedule in the latest Infrastructure Delivery Plan, or otherwise alternative interventions which provide comparable mitigation</p>
<b>Site Policy A26: Blackwell Farm, hogs Back, Guildford</b>	
Description	<p><a href="#">Area (size) 8678</a></p>
Requirements	<p>(14) Bespoke SANG to avoid <a href="#">adverse</a> effects on the integrity of the SPA (See the IDP for further information)</p>

Paragraph or Section	Proposed Modification
<b>Site Policy A27: Warren Farm, White Lane, Ash Green</b>	
Requirements	(1) <u>Ensure that S</u> sufficient capacity is available within Ash Vale wastewater treatment works to accept wastewater from this development within its permitted limits
<b>Site Policy A28: Land to the east of White Lane, Ash Green</b>	
Title	A28: Land to the east of White Lane, Ash <u>Green</u>
Requirements	(1) <u>Ensure that S</u> sufficient capacity is available within Ash Vale wastewater treatment works to accept wastewater from this development within its permitted limits
<b>Site Policy A29: Land to the south and east of Ash and Tongham</b>	
Requirements	(3) <u>Ensure that S</u> sufficient capacity is available within Ash Vale wastewater treatment works to accept wastewater from this development within its permitted limits
<b>Site Policy A35: Former Wisley Airfield, Ockham</b>	
Requirements	(12) Bespoke SANG to <del>mitigate impacts</del> <u>avoid adverse effects</u> on the <u>integrity of the</u> SPA (See the IDP for further information)
Opportunities	(1) Reduce <del>the flood</del> risk <u>of flooding</u> elsewhere <u>as far as practicable</u>
<b>Site Policy A33: The University of Law, Guildford</b>	
Allocation	The site is allocated for <u>approximately</u> 112 student bedspaces (sui generis)

Paragraph or Section	Proposed Modification
<b>Site Policy A38: Land to the west of West Horsley</b>	
Requirements	(4) Bespoke SANG <u>to avoid adverse effects on the integrity of the SPA</u> (see the IDP for further information)
<b>Site Policy A43: Land at Garlick’s Arch</b>	
Requirements	<u>Transport strategy</u> (0a) “Main vehicular access to the site allocation provided <u>from</u> <del>on</del> the A247 <del>frontage</del> ”
<b>Site Policy A45: Land at the rear of the Talbot, High Street, Ripley</b>	
Allocation	The site is allocated for approximately <del>18-26</del> homes (C3) and <del>200-90</del> sq m of retail or service uses (A1 – <del>A45</del> )
Requirements	(1) The retail or service uses (A1 – <del>A45</del> ) should front the High Street, providing a shop frontage to add to the liveliness of the centre
<b>Site Policy A58: Land around Burnt Common warehouse, London Road, Send</b>	
Requirements	(0b) Necessary and proportionate contribution towards an off site walking and cycle network between the village centre of Send, the <del>Burnt Common warehouse land at Garlick’s Arch</del> site and Clandon railway station
<b>Site Policy A55: The Orchard, Puttenham Heath Road, Puttenham</b>	
Existing use	<del>Temporary</del> Traveller accommodation (one pitch) (sui generis) and private residential garden
LAA Reference	Site <u>13992418</u>

Paragraph or Section	Proposed Modification
<b>Appendix A: Glossary</b>	
Definition of Affordable Housing	<p><u>Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:</u></p> <p>a) <b><u>Affordable housing for rent:</u></b> meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).</p> <p>b) <b><u>Starter homes:</u></b> is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household’s eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.</p> <p>c) <b><u>Discounted market sales housing:</u></b> is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.</p> <p>d) <b><u>Other affordable routes to home ownership:</u></b> is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.</p>

Paragraph or Section	Proposed Modification
	<p><u>Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices and housing need in accordance with our allocations policy. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</u></p> <p><del>Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices and housing need in accordance with our allocations policy. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</del></p> <p><del>Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.</del></p> <p><del>Affordable rented housing is let by registered providers local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). Guildford's affordable rent which is 70%, or LHA equivalent, whichever is lower.</del></p> <p><del>Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.</del></p> <p><del>Homes that do not meet the above definition of affordable housing, such as 'low cost market' housing, may not be considered as affordable housing for planning purposes.</del></p>
<p>Definition of Affordable Rented Housing</p>	<p><u>In Guildford borough, affordable rent is 80% of market rent, or Local Housing Allowance (LHA) equivalent, whichever is lower. Although the Council requires this from developers and housing associations, rent is often lower than this for the Council's own new-build stock. For a full list and definitions of the types of housing classed as affordable, see the entry for Affordable housing.</u></p>

Paragraph or Section	Proposed Modification
Definition of Business Incubation Centres	<u>Business incubation centres help new and startup companies to develop by providing services such as management training or office space. They often provide small services offices on short leases at lower rents.</u>
Definition of Designated Rural Areas	<u>National Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985.</u>
Definition of Entry-level exception site	<u>A site that provides entry-level homes suitable for first time buyers (or equivalent, for those looking to rent), in line with paragraph 71 of the NPPF.</u>
Definition of Intermediate housing	<u>Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing. For a full list and definitions of the types of housing classed as affordable, see the entry for Affordable housing.</u>
Definition of Intermediate affordable housing	<del>See definition under Affordable Housing.</del>
Definition of Large scale major development	<del>A large scale major development is one where the number of residential units to be constructed is 200 or more. Where the number of residential units to be constructed is not given in the application a site area of 4 hectares or more should be used as the definition of a major development. For all other uses a large scale major development is one where the floor space to be built is 10,000 square metres or more, or where the site area is 2 hectares or more.</del>

Paragraph or Section	Proposed Modification
Definition of Lifetime homes	<del>A series of sixteen design criteria (including stairs, entrances and so on) intended to make homes more easily adaptable for lifetime use thereby ensuring that homes are useable by people of varying age and ability, thus extending the building's useful life.</del>
Definition of Out of Centre	<u>A location which is not in or on the edge of a centre but not necessarily outside the urban area.</u>
Definition of Out of Town	<u>A location out of centre that is outside the existing urban area.</u>
Definition of Primary Shopping Area	<u>Defined area where retail is concentrated.</u>
Definition of Protected Species	A species <u>legally</u> protected by <u>wildlife legislation, including</u> the Wildlife and Countryside Act <u>(as amended)</u> 1981, <u>and the Conservation of Habitats &amp; Species Regulations 2010.</u>
Definition of Smart Growth	<p><u>The Corporate Strategy (2016) highlights Guildford's role as a "smart growth" hub and establishes that one of the Council's key priorities is promoting innovation and growth in high value clusters, particularly to encourage economic growth through knowledge, innovation and creativity. This means helping business to improve their productivity without damaging our quality of life or environment.</u></p> <p><u>Surrey Connects described Smart Economic Growth as driving sustainable economic growth through knowledge, innovation and creativity, with a focus on extracting 'more from less' so we can all benefit from a prosperous economy and a high quality of life.</u></p>

Paragraph or Section	Proposed Modification
Definition of Social rented housing	<p><del>See definition under Affordable housing.</del></p> <p><u>Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.</u></p>
Definition of Special Area of Conservation (SAC)	<p><del>An SSSI additionally designated a Special Area of Conservation under the European Community's Habitats Directive 1992 (92/43/EEC), in order to maintain or restore priority natural habitats and wild species. Together with SPA's, SAC's comprise the European Union's 'Nature 2000' network of habitats of pan-European nature conservation importance.</del></p> <p><u>Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.</u></p>
Definition of Special Protection Area (SPA)	<p><del>An SSSI additionally designated a Special protection Area under the European Community's Directive (79/409/eeec) on the conservation of wild birds 1979, because of the need to protect threatened birds, their eggs, nests and habitats.</del></p> <p><u>Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.</u></p>

Paragraph or Section	Proposed Modification
<b>Appendix A1: Maps showing 500m catchment of Public Transport Interchange</b>	
Whole Appendix	Amend 'buffer' to ' <u>catchment</u> '
<b>Appendix C: Infrastructure Schedule</b>	
Schemes LRN7, BT2, BT3, and AM3	[...] <del>Land at</del> former Wisley airfield site
BT3	<del>Significant-Extended and/or new bus servicesnetwork serving to serve</del> the Land at Former Wisley Airfield site and <del>key destinations including the existing which will also serve</del> Effingham Junction railway station and/or Horsley railway station, Guildford and Cobham to be provided and secured in perpetuity
BT5	<del>Significant-Extended and/or new bus servicesnetwork serving to serve</del> the Gosden Hill Farm site and <del>key destinations including the existing which will also serve the</del> eastern suburbs of Guildford and the town centre to be provided
BT6	<del>Significant-Extended and/or new bus servicesnetwork serving to serve</del> the Blackwell Farm site and <del>key destinations including the existing which will also serve the</del> western suburbs of Guildford and the town centre to be provided
SED3	A 6FE secondary school at Blackwell Farm strategic development site. <u>To be located so as to ensure convenient access via public transport and from the urban area of Guildford.</u> <del>To be located to the north of the site.</del>

Paragraph or Section	Proposed Modification
<b>Appendix D: Evidence Base</b>	
Research	<p><b><u>Assessment of Sites for Amenity Value (2017)</u></b></p> <p><u>This document assess open land within villages proposed to be inset from the Green Belt to identify land that has public amenity value and should be protected as Open Space in line with the NPPF.</u></p>
Research	<p><b><u>Guildford Borough Council Local Plan and CIL Viability Study, Final Report (2016)</u></b></p> <p><u>The Study includes a Plan viability assessment (PV) of the Guildford borough Submission Local Plan to provide evidence that the policy requirements in the Plan do not threaten the development viability of the Plan as a whole. The Study also tests the Plan’s affordable housing policy in the context of the PV assessment.</u>  <a href="http://www.guildford.gov.uk/newlocalplan/developmentviability">http://www.guildford.gov.uk/newlocalplan/developmentviability</a></p> <p><b><u>Guildford Borough Proposed Submission Local Plan “June 2016”: Strategic Highway Assessment Report (Surrey County Council, June 2016)</u></b></p> <p><u>The strategic highway assessment follows and builds on earlier assessments, but is different in that, firstly, it assesses the growth scenario that represents the spatial strategy in the Proposed Submission Local Plan, and secondly, it assesses the mitigation provided by the highway schemes from the programme of transport schemes that are considered necessary for the delivery of the plan.</u>  <a href="http://www.guildford.gov.uk/transport">www.guildford.gov.uk/transport</a></p>
Research	<p><b><u>Local Plan Viability Update (Guildford Borough Council, 2017)</u></b></p> <p><u>This report supplements the aforementioned Viability Study by addressing the impact on Plan viability of the changes made to policies in the Submission Local Plan: strategy and sites 2017.</u>  <a href="http://www.guildford.gov.uk/newlocalplan/developmentviability">http://www.guildford.gov.uk/newlocalplan/developmentviability</a></p> <p><b><u>Local Plan and Affordable Housing Viability Study (2014)</u></b></p> <p><u>The study tests the circumstances in which the Council can expect the residential property market to deliver the required levels of affordable housing and suitable rates for CIL.</u>  <a href="http://www.guildford.gov.uk/article/3959/Affordable-Housing-Viability-Study">www.guildford.gov.uk/article/3959/Affordable-Housing-Viability-Study</a></p>

Paragraph or Section	Proposed Modification
Research	<p><b><u>Review of Housing Needs Evidence across West Surrey HMA (2017)</u></b></p> <p><u>This report brings together evidence on Objectively Assessed Housing Need (OAN) across the West Surrey Housing Market Area (HMA).</u>  <a href="http://www.guildford.gov.uk/shma">http://www.guildford.gov.uk/shma</a></p>
Research	<p><b><u>Strategic Highway Assessment for the Proposed Submission Local Plan (Surrey County Council, June 2016)</u></b></p> <p><del>The strategic highway assessment follows and builds on earlier assessments, but is different in that, firstly, it assesses the growth scenario that represents the spatial strategy in the Proposed Submission Local Plan, and secondly, it assesses the mitigation provided by the highway schemes from the programme of transport schemes that are considered necessary for the delivery of the plan.</del></p> <p><del><a href="http://www.guildford.gov.uk/transport">www.guildford.gov.uk/transport</a></del></p>
Research	<p><b><u>Surrey Hills AONB Areas of Search Natural Beauty Evaluation Report (2013)</u></b></p> <p><u>The document identifies ‘areas of search’, which are judged to meet the natural beauty criteria of an AONB. The findings have been submitted to Natural England for consideration of an extension to the Surrey Hills AONB.</u>  <a href="http://www.guildford.gov.uk/newlocalplan/protectinganddesign">http://www.guildford.gov.uk/newlocalplan/protectinganddesign</a></p>
Research	<p><b>Water Quality Assessment</b></p> <p>The Water Quality Assessment provides an assessment of the impact of local plan proposals on water quality by examining impacts on wastewater infrastructure. <u>It also assesses the impacts on the environmental capacity of the water bodies receiving effluent (wastewater).</u>  <a href="http://www.guildford.gov.uk/newlocalplan/infrastructureanddelivery">www.guildford.gov.uk/newlocalplan/infrastructureanddelivery</a></p>

Paragraph or Section	Proposed Modification
<b>Appendix E: Superseded Policies</b>	
Policy P3	RE4 Countryside beyond the Green Belt R11 Blackwater Valley <u>H6 Replacement dwellings in the countryside</u> <u>H9 Extensions to dwellings in the countryside</u>
Policy D2	D2 <u>Climate change</u> , <u>Sustainable design, construction and energy</u>
Policy E7	E7 <u>Retail and leisure uses in</u> Guildford Town Centre
<b>Appendix G: Policy and Monitoring</b>	
Whole Appendix	Whole appendix removed.
<b>General</b>	
Whole Plan	Amended paragraph numbers, Policy criteria, Site Allocation Policy numbers and Appendix numbers to reflect consecutive numbering.
Whole Plan	Minor grammatical and typographical errors have been corrected throughout.

Paragraph or	Proposed Modification	
Whole Plan; Various Paragraphs	The following paragraphs have been moved from one part of the Plan to another:	
	<b>Original Paragraph Number</b>	<b>Moved to:</b>
	Policy E1, Policy Criteria (2) and (3)	Policy E2
	Policy E1, Policy Criteria (4), (5), (6), (7), (8), (9), (10) and (11)	Policy E3
	Policy E1, Paragraphs 4.4.6, 4.4.7, 4.4.9, and 4.4.11a	Policy E3
	Policy E7, Paragraphs 4.4.67 and 4.4.68	Policy S3
	Policy E7, Paragraph 4.4.70, 4.4.78, 4.4.79, 4.4.80, 4.4.81, 4.4.82, 4.4.83, and 4.4.87	Policy E1
	Policy E7, Key Evidence, Bullet 2	Policy E1
	Policy E7, Monitoring Indicators, Table rows 1 and 2	Policy E1
	Policy D4, Paragraphs 4.5.48, 4.5.49a, 4.5.50, and 4.5.52	Policy D1
	Policy D4, Key Evidence and Monitoring Indicators	Policy D1
Whole plan	Amend all references to ‘national planning policy’ to ‘The NPPF’ as follows: “ <del>National planning policy</del> <u>The NPPF</u> ”	