



# COMPTON PARISH COUNCIL

21-10-22

Mr David Reed BSc DipTP DMS  
Planning Inspector  
c/o Programme Officer- Mr Robert Young  
Guildford Borough Council  
Millmead  
Guildford  
GU2 4BB

Dear Mr Reed

Compton Parish Council have responded to each iteration of the GBC Local Plan: Development Management Policies with our concerns and recommendations to assist in ensuring Guildford has workable policies in the best interests of Guildford and its' residents. We welcome the opportunity to participate in the hearing to ensure the DMP enable development of the right form and in the right place for Guildford. The policies should not only enable the attractive aspects of Guildford to remain but also provide the much needed social and affordable homes alongside the correct mix of market housing whilst taking into account Climate Change, infrastructure, sustainability and character.

H7 Compton PC considers any potential viability review of affordable housing ratios should be in the public domain and only permissible in exceptional circumstances

When affordable housing ratios are lower than agreed, the council should reserve the right to postpone development if by doing so a greater level of affordable housing could be delivered in the future.

Compton PC have concerns over viability and the affect on proportion of affordable homes. See our comment on height standard required.

Compton PC have concerns that allocated sites get split and each developer can then bring forward market homes and evade s106 and affordable home provision.

ID10 achieving a comprehensive GBC cycle network. Compton PC feel the proposals do not go far enough to create a joined up comprehensive safe cycle network that will contribute sufficiently to achieve the desired modal shift in transport and movement within the Borough. Our roads are typically narrow and do not facilitate safe cycle lanes. Many of the proposed routes peter-out often joining major roads with no bridge, pelican crossing or underpass to enable onward journey to main destinations. For example, the proposed cycle route from Weyside urban village leaves one having to cross the A3 A25 junctions and then use busy roads to get to the station or town centre. The western greenway incorporates steep routes and involves crossing a major A road (A31) where there have been fatalities. Compton PC is concerned that parts of the cycle network proposed pass-through Ancient Woodland with potential harm to the woodland itself and the habitat of species included protected species – Bats, Badgers etc.

Whilst modal shift is supported, in reality it is unsafe on busy roads such as the B3000 where several very serious and at least one fatal accident involving cyclists have happened recently. Cycle lanes should be sufficiently wide and preferably separate from mainstream traffic.

P6/7 Biodiversity in New Developments. To ensure developments are beneficial and do not cause harm Compton PC believe Policy P6 does not go far enough. Buffer zones should be of adequate size to mitigate according to the site and development. Buffer zones around sensitive areas should be specified. Words such as expect are too weak and should be replaced by requires and must. For, example, the policy "requires

proposals to be guided by other national, regional and local biodiversity strategies.” And “Where sites contain or are adjacent to sensitive habitats, appropriate buffers and, where necessary, barriers must be incorporated in order to protect the habitats from the impacts of the development, including those resulting from recreational use. Schemes should be designed to avoid light pollution. If a lighting strategy is provided, it must take account of the potential impacts on wildlife. Guildford has important underground water as well as rare chalk streams and therefore ensuring pollution is reduced and the environment can sustain critically important habitats is crucial.

P7 Biodiversity net gain. Compton PC fully endorse GBC policy to require a biodiversity net gain of 20pct. We believe GBC have robust reasons for this policy. Compton PC are concerned at the use of glyphosates and then wild seed planting and look to real measures to ensure biodiversity is established and maintained on new developments.

P11 Air Quality and AQMAs,

Compton PC have serious concerns regarding Air Quality having an AQMA declared on our main street as well as in neighbouring Shalford.  
Compton PC query point 7, which states:

"A 'Verification Report' must be submitted to the Council and approved prior to the development's occupation or use, which demonstrates the agreed avoidance and mitigation measures have been implemented effectively.

We ask for this to be changed to: "A 'Verification Report' must be submitted to the Council and approved prior to planning approval, which demonstrates the agreed avoidance and mitigation measures have been implemented effectively. " There is no point in building houses or offices that can't be occupied due to unacceptable levels of pollution and any new developments should not impact further on declared AQMAs.

D12. Compton PC generally agrees policy D12 but has concerns on the impact of development of both new and existing buildings to minimise the carbon footprint. Too often new developments will demolish the old and not re-use the existing fabric or materials.

D13 Climate Change adaption. Compton PC agrees with policy D13 and stresses the importance of Climate Change considerations being at the heart of all decisions.

D14 Compton are in general agreement with the GBC line on this. Compton PC would prefer to see an interim climate-change mitigation policy introduced, which could be updated in the light of possible amendment to the Planning and Energy Act 2008. To introduce a more stringent carbon-reduction standard that is subject to “viability testing” would give developers the “wriggle room” to simply say that meeting the new standard is not viable.

The construction industry is one of the biggest emitters of carbon and the NPPF demands, sustainable developments.

Compton PC recommend the required carbon emissions target is raised to 40% for domestic buildings and 30% for non-domestic buildings.

D15 Large scale renewable and low carbon energy.

Compton PC could only support this Policy under the proviso that any land selected for large-scale renewable and low-carbon energy would have zero impact on Areas of Outstanding Natural Beauty (including their settings), Areas of Great Landscape Value and on the openness of the green belt as well as not reducing much needed good quality farmland.

Do you have any other comments or suggestions?

Incorporate within the policy a stipulation that no land selected for large-scale renewable and low-carbon energy will impact the AONB or its setting, AGLV or the openness of the green belt. Place a greater emphasis on energy efficiency in terms of design. Brownfield first should also apply as Guildford has many acres of surface car parks which should be utilised for solar above cars rather than taking more countryside.

Viability. Compton PC has serious concerns over the use of viability to reduce provision of social and affordable homes. Design standards including having a height standard (variable according location, critical views and ground height) would ensure developers know what they can build when they bid for land as opposed to paying over the odds expecting to build high only to be restricted and then use viability to ensure no affordable homes or other benefits are provided with the development.

Matter 7 Other Policies.

Policy P8. A major concern has been the protection of Ancient Woodland, Veteran and Ancient trees and their habitats.

We have held discussions with Natural England who supported our request for stronger policies in this respect. Whilst we were able to obtain a small change, we strongly believe this should go further. Whilst Compton PC supports GBC's aim to protect irreplaceable habitats, the PC does not feel that the wording of Policy P8 provides this protection. In particular Bullet Point 2, which allows the loss, damage or deterioration of irreplaceable habitats by development, if "there are wholly exceptional reasons and the exceptional benefits of the development proposal outweigh the loss of the habitats, demonstrated through unequivocal and credible evidence". The term "exceptional" is a subjective and Compton PC feels that these "exceptional reasons" and "exceptional benefits" need to be spelt out for the policy to have meaning.

Compton PC would like to see the buffer zone around ancient woodland increased to 50m in line with recommendations by the Woodland Trust We also disagree with the suggestion that a road should be used to separate ancient woodland from housing development. Building a road adjacent to ancient woodland could have a negative impact on this sensitive environment in terms of noise, air pollution and wildlife.

The PC is concerned that Point 5 is too weak and the words "Site design is expected to incorporate significant trees plus their root structures and understory within the public realm" should be changed to "Site design is required to incorporate significant trees ...).

Compton submitted comments and concerns about a number of other policies, which mirrored comments for the majority of Parish Councils who submitted a response, as well as groups more reflective of the Town Centre resident groups. These included H4 Density (concerning its removal), H5 Housing Extensions & Alterations, P8/9 Protecting Important habitats and Species, D4 Achieving High Quality Design and Respecting Local Distinctiveness and D9 Residential Infill Development. We also have significant concerns with regard to a policy on Height (see above), a matter which we do not believe is significantly covered through D4. Compton PC remain concerned at Developments coming forward without adequate infrastructure, something not always in the gift of the Borough, despite the Local Plan calling for infrastructure first.

Compton have concerns regarding Air Quality P11 as stated above. Levels on the A3 which runs through Compton are the highest in the Country outside London measured at around 90. Levels in the Street Compton are so high an AQMA has been declared.

We also have concerns with regard to the Monitoring Indicators where GBC have not acknowledged the importance of this, despite our raising the issue and other Councils covering this in their policies. Throughout the documents references are to a measure against the number of appeals which we believe is inadequate. We are of the firm belief that additional 'measures of success' or KPIs should be included throughout the document e.g., for Policy P11 Air Quality a powerful measure would be that Guildford's Air Quality has actually improved through application of this policy. This applies to many others. Other Council's Development Management Plans include specific measures as Monitoring Indicators.

**Ramsey Nagaty**  
**Compton Parish Councillor**  
GBC Ward Councillor for Shalford

cc Joanna Cadman Parish Clerk