
Guildford Local Plan: Development Management Policies Main Modifications consultation comments

MM1 Policy H7: Review Mechanisms

Agent	Barton Willmore
Respondent	Martin Grant Homes
Comment ID	LPDMPMM/31
Main Modification	MM1 Policy H7: Review Mechanisms
Comment	<p>We write on behalf of our client Martin Grant Homes (MGH) in response to Guildford Borough Council’s consultation on proposed Main Modifications to the Guildford Local Plan: Development Management Policies.</p> <p>As background, MGH owns (freehold) the Gosden Hill strategic site allocated for residential mixed-use development in Policy A25 of the adopted Guildford Borough Local Plan: Strategy and Sites (April 2019). MGH have participated in all previous stages of the Development Management Policies’ preparation to date. The representations below build upon the representations previously made, both orally and in writing.</p> <p>MM1</p> <p>We have previously commented on the need for clarity on when reviews will be undertaken. The modifications proposed to paragraph 1) of the policy and paragraph 2.33 of the supporting text provide some additional clarity. However, overall, we consider that the policy does not provide clarity for applicants in accordance with NPPF paragraph 35 and fails to be effective. In particular, there is a need for certainty on when review mechanisms will be required.</p> <p>Moreover, we are concerned that no modification has been proposed to ensure that any surplus identified within a review process is shared between the Council and applicant. This lack of sharing prospective returns disincentivises the applicant from maximising the profitability of the development, as it effectively gives the Council a ‘first charge’ on any additional returns generated from the scheme until any deficit against the policy compliant cap is met. It is therefore likely to be less effective in securing additional contributions than if adopting a model which equitably shares any surplus up to the policy compliant maximum.</p> <p>We welcome the addition to paragraph 2.39, referencing a dispute resolution process in the event of a disagreement over the review process or outcome. This is a positive addition which is necessary to include in case of any disagreements.</p>

	<p>We remain of the view that an SPD should be prepared to provide further guidance for applicants, on the viability review process, methodology, terms of engagement and viability review formulae to be included in Section 106 Agreements.</p> <p>Without these amendments, there is a lack of clarity and transparency, resulting in the policy not being sound.</p>
Attached files	
Agent	Savills
Respondent	Taylor Wimpey
Comment ID	LPDMPMM/35
Main Modification	MM1 Policy H7: Review Mechanisms
Comment	TW did not submit a representation at the Regulation 19 stage, and thus has no comment to make.
Attached files	230131 GBC DMP - Main Mods.pdf
Agent	
Respondent	GRA (Amanda Mullarkey)
Comment ID	LPDMPMM/41
Main Modification	MM1 Policy H7: Review Mechanisms
Comment	<p>The expectation of a late stage review is welcome but does not go far enough to prevent brinkmanship by developers. Only by being mandatory does it prevent developers offering a low but certain guaranteed quantum up front or a quantum determined by review later (cf North Street). Value engineering only happens after the application stage and inevitably reduces costs below assumptions made at the point affordability is calculated initially. Mandatory late stage reviews would enable focus on the most appropriate affordable homes contribution up front and confidence this can also be adjusted later as required. Uncertainty as to whether there will be a late stage review is exploited as a</p>

	negotiating position by developers.
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Attached files	
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MM2 Policy H8: First Homes

Agent	
Respondent	Normandy Parish Council (Mrs Briony Howarth)
Comment ID	LPDMPMM/14
Main Modification	MM2 Policy H8: First Homes
Comment	<p>It is obvious in reading the documentation the Policy Document concentrates on the at the primary effort by GBC and the Inspector was in the production of the Local Plan accepted in 2019 which contained predominately the number of Houses, Infrastructure and areas where development was to be concentrated in.</p> <p>This Development Management Policy was produced to fill in the “gaps” that were not concentrated on in the original Local Plan namely areas such as “biodiversity”, cycle paths, First homes, Air Quality etc.</p> <p>Both MM1 & MM2 refer to affordable homes and generally refer to the number of houses of that status that should be included in any developers plans when a substantial number of homes on a site are considered. This is generally 25% but can vary if in agreement with the Council is either on-site, off-site or a financial contribution in lieu of on-site development in line with the councils adopted affordable housing requirement.</p> <p>These affordable homes are expected to be first homes.</p> <p>An interesting observation with respect to affordable housing is shown as after paragraph 2.53.</p> <p>It is recognised that, due to relatively high average market house prices in the Borough, the national policy expectation for a minimum of 25% First Homes, combined with application of the price cap, may lead to provision of First Homes under the policy being predominantly or primarily in the form of one-bedroom homes. Where there is agreement that compliance with this level of provision may lead to an adverse planning outcome in relation to site design and/or housing mix/tenure there may be scope for some flexibility. Any substitute for First Homes would be the provision of other forms of affordable housing so that the requirements of Policy H2 are still met. Early engagement with the Council’s Housing team is advised to establish any specific factors that should be considered in terms of local housing needs that may impact on the desired tenure mix.</p>

Attached files	
Agent	Barton Willmore
Respondent	Martin Grant Homes
Comment ID	LPDMPMM/32
Main Modification	MM2 Policy H8: First Homes
Comment	<p>Within our earlier representations, we commented on the need for some flexibility in tenure mix, rather than imposing a specific requirement on all sites regardless of context, to ensure that suitable and viable proposals can be delivered. We therefore support the amendments proposed as part of MM2 to allow for some flexibility in affordable housing tenures provided as part of development.</p>
Attached files	
Agent	Savills
Respondent	Taylor Wimpey
Comment ID	LPDMPMM/36
Main Modification	MM2 Policy H8: First Homes
Comment	<p>TW support the removal of the word “required” in Policy paragraph (1).</p> <p>TW support the additional supporting text added as new paragraph 2.54 (after 2.53), which increases the flexibility on the provision of First Homes, owing to the likely outcome of predominantly one-bedroom homes within GBC. This might well be the case with larger strategic sites such as Wisley New Settlement.</p> <p>TW support the provision of other forms of affordable housing as a substitute for First Homes, should their provision lead to an adverse planning outcome set out within the additional supporting text.</p>
Attached files	

Agent	CBRE
Respondent	Harris Family (Julian and Nicola Harris)
Comment ID	LPDMPMM/42
Main Modification	MM2 Policy H8: First Homes
Comment	Paragraph 2.53: The proposed wording at Paragraph 2.53 is supported, as it allows for flexibility on larger sites where the provision of First Homes may lead to an adverse planning outcome for the site design or unit mix. It is considered this should be reflected in the policy text itself.
Attached files	CBRE Representations GBC DM Policies Main Mods FINAL.pdf

MM3 Policy P6/P7: Biodiversity in New Developments

Agent	
Respondent	Defence Infrastructure Organisation (SoSD n.a. n.a.)
Comment ID	LPDMPMM/13
Main Modification	MM3 Policy P6/P7: Biodiversity in New Developments
Comment	<p>Please see the attached letter.</p> <p>[Text of letter reproduced below]</p> <p>Firstly, we would like to thank the Planning Authority for the opportunity to comment on the above document. This letter is on behalf of the Secretary of State for Defence (SoSD).</p> <p>As you will be aware we submitted comments at the earlier stages of the plan (our reference PIR/GBCLDP/02- 22). These covered three main areas:</p> <ol style="list-style-type: none">1. Suggesting a policy be included on MOD establishments2. Commenting on Policies P6/P7 on Biodiversity in New Developments seeking a clearer evidence base justifying the requirement for 20% Biodiversity Net Gain; and3. Neighbourhood planning. <p>It is noted that the schedule of modifications does not appear to respond to matters 1 and 3 above, nor has the evidence provided sought to address those issues. So, we would welcome further engagement with the Planning Authority regarding their consideration of those issues raised.</p> <p>Regarding matter 2 above, we have reviewed the evidence provided to the Local Plan inquiry and the later “targeted consultation” as well as now the proposed main modifications (your reference MM3) and believe these are based on a false presumption that previously developed</p>

land will be exempted from the requirement to provide biodiversity net gain and that the requirement for a 20% uplift is not clearly supported by a reasoned justification contrary to:

- Paragraph 8 (3), Part 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which states that “A local plan ... must contain a reasoned justification of the policies contained in it”.

As explained in the earlier representations, the MOD has significant land holdings in the Borough, it is currently envisaged to bring forward significant redevelopment proposals at its previously developed sites in the Borough, particularly at Pirbright. The policy as proposed to be amended at MM3 would therefore run contrary to the requirements of Paragraph 8(3) as stated above and to paragraph 97 of the National Planning Policy Framework by not taking into account wider security and defence requirements.

For those reasons we wish to object to the modifications and seek further discussions with the Planning Authority on the above matters.

Attached files [202301 GBC L-Plan MM Ltr.pdf](#)

Agent

Respondent Normandy Parish Council (Mrs Briony Howarth)

Comment ID LPDMPMM/15

Main Modification MM3 Policy P6/P7: Biodiversity in New Developments

Comment

<p>MM3 P6/ P7 Para 1</p>	<p>....gain on site, subject to delivering other planning priorities, a</p>	<p>Adding in subject to delivering other planning priorities could significantly weaken protection of existing biodiversity and biodiversity gain. Need to be clear that that Biodiversity Gain has high priority and is not pushed down the priority order.</p>
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Para 12	...qualifying development proposals, after the national scheme comes into effect, are required	Why wait? The National scheme is not due until Autumn 2023 at the earliest. This could result in significant biodiversity loss and the loss of opportunity for biodiversity gain on numerous developments within GBC. Yet in Para 4.44 GBC notes that this area, along with much of Surrey has had highly significant biodiversity loss and it is very important to protect and enhance biodiversity. By adding in this phrase, GBC shows it is not taking biodiversity gain seriously.
Para 4.16	Whole of added in section	This needs to be worded more strongly to put biodiversity on an equal footing with other key priorities. It should not be side-lined or ignored.
Para 4.47	Whole Clause	By providing off-site areas for biodiversity gain, this gives developers a Get-Out clause to not consider biodiversity protection or gain when proposing developments. Wording needs to be changed to stress that Off-site areas should be last resort only and only permitted on a case-by-case basis.

Attached files

Agent	LRM Planning Ltd.
Respondent	Hallam Land Management Ltd (c/o agent c/o agent)
Comment ID	LPDMPMM/25
Main Modification	MM3 Policy P6/P7: Biodiversity in New Developments
Comment	<p>Please refer to the accompanying Representations.</p> <p>[Text of representation reproduced below]</p> <p>The modifications proposed to this policy continue to exceed the requirements within the Environment Act and should be amended to avoid</p>

potential viability and delivery pressures on developers across the Borough.

Hallam welcome and agree to the amendment to Policy P6/7 (12), to ensure the requirement for biodiversity net gain in Guildford is implemented after the 'National Scheme comes into effect'. This is critical to ensure the infrastructure and mechanisms for on site and off site delivery of net gains are accessible and achievable for developers.

During the Examination Hearings the Council presented evidence as to why they consider it acceptable to require a greater biodiversity net gain in Guildford compared to the national requirement. However, this instead demonstrates the need to strongly encourage developers to exceed the 10% rather than set a minimum requirement of 20%. This approach would be consistent with the national approach and ensure schemes are not delayed due to a higher requirement.

Hallam agree with the Council that there are situations where due to the baseline of a site, the scheme can achieve a biodiversity net gain which exceeds the 10% requirement and the proposed 20% requirement. However, it must be acknowledged that should a site have a high baseline, achieving a gain is difficult and a 20% gain would be both a challenge for developers and above that required by national legislation.

The amended wording to Policy P6/7 at paragraph 4.47 does not fully address the proposed offsite scheme, when it refers to '*the Council intend to offer developers opportunities for off-site biodiversity net gain at its Tyting Farm site and will encourage other sites to be provided in the Borough to ensure the local availability of alternative options*'.

Should the 20% requirement be adopted then there needs to be an offsite scheme secured by the Council which is available and accessible to developers to help them achieve the above national approach requirement. The wording should instead state '*the Council will offer developers opportunities for off-site biodiversity net gain at its Tyting Farm site, as evidenced in the preparation of this policy, and will bring forward additional sites within the Plan Period across the Borough to provide local availability of offsite credits for biodiversity net gain.*'

Alongside the above amendment there should be wording to secure the delivery of this offsite credit bank and make it accessible to developers prior to the Environment Act being implemented. Hallam continue to support the need to deliver biodiversity net gain, however, do not agree a higher requirement of 20% is necessary in Guildford and recommend the policy is amended.

Attached files

[230201 Development Management Policies Main Modification Consultation_.pdf](#)

Agent

Respondent

Surrey County Council (Sir or madam)

Comment ID	LPDMPMM/30
Main Modification	MM3 Policy P6/P7: Biodiversity in New Developments
Comment	<p>As responsible authority for the Local Nature Recovery Strategy, Surrey County Council welcomes and supports the content of Policy P6 / P7 – Biodiversity in New Developments and Policy P8 / P9 - Protecting Important Habitats and Species. We have one comment relating to the proposed Main Modifications:</p> <p>At MM3, P6/ P7, Policy Paragraph 13:</p> <p><i>Where previously developed land is exempted from biodiversity net gain under the relevant regulations, a minimum net gain will not be required unless the site supports at least one protected or priority species population or habitat, or an assemblage of species with an otherwise demonstrably high biodiversity value. Where these are present, a measurable 20% net gain for those features will be required.</i></p> <p>The Defra biodiversity metric only considers habitats (it excludes faunal protected species / species of conservation concern). As such, the metric cannot be used for faunal species. To avoid confusion, the wording of the paragraph should be amended to clarify it is solely of relevance to habitats, assemblages of plants and protected plant species.</p>
Attached files	
Agent	Barton Willmore
Respondent	Martin Grant Homes
Comment ID	LPDMPMM/33
Main Modification	MM3 Policy P6/P7: Biodiversity in New Developments
Comment	<p>We welcome the proposed amendment to paragraph 1) of the policy which appropriately recognises that other planning priorities will be important alongside biodiversity gain, and that gain should only be maximised subject to these other priorities also being deliverable. The additional supporting text at paragraph 4.16 is also welcomed in this regard.</p> <p>We remain of the view that there is insufficient evidence to justify the proposed minimum requirement for a 20% biodiversity net gain,</p>

	<p>significantly beyond the minimum 10% requirement set to be imposed nationally through secondary legislation under The Environment Act 2021. The Council’s evidence was released at a late stage and, as discussed at the hearing and as raised in our subsequent written submission, there are significant doubts regarding the availability and cost of securing off-site BNG credits. In our view, the introduction of a requirement above that nationally prescribed should be pursued through a future review of the Local Plan Strategy and Sites. In conclusion, we maintain that the requirement is unsound.</p> <p>Notwithstanding our views on the soundness of the requirement, there is a need for clarity on when the requirement will come into force, particularly in respect of the transitional arrangements which will apply. It is encouraging that the requirement will not come into force until the Government imposes the national requirement through secondary legislation, currently anticipated in November 2023. However, for transitional arrangements to be effective, only applications submitted after the minimum 20% requirement comes into force should be expected to achieve this level. Any alternative approach could unreasonably impose an additional requirement on applications part-way through their determination.</p>
Attached files	
Agent	Savills
Respondent	Taylor Wimpey
Comment ID	LPDMPMM/37
Main Modification	MM3 Policy P6/P7: Biodiversity in New Developments
Comment	<p>TW support the addition of after the “National scheme comes into effect” in policy paragraph (12) which recognises the requirement for the policy to conform with National Policy.</p> <p>TW object to the requirement for 20% BNG set out within Policy 13, which is greater than the 10% required within the Environment Act and is likely to be an onerous requirement for many developers and negatively impact upon the viability of the delivery of development upon previously developed land.</p> <p>TW support the inclusion of “viability” within paragraph 4.16 and paragraph 4.44.</p>

	TW support GBC initiatives, such as at Tyting Farm, to offer developers opportunities for off-site biodiversity net gain. Wisley New Settlement, might, in time be another candidate site to provide other developers alternative off-site opportunities to achieve BNG.
Attached files	
Agent	
Respondent	GRA (Amanda Mullarkey)
Comment ID	LPDMPMM/43
Main Modification	MM3 Policy P6/P7: Biodiversity in New Developments
Comment	20% biodiversity net gain is welcome. However, the policy should be drafted to avoid 20% onsite provision being a driver for taller buildings given the sensitivity of this issue in Guildford's downland landscape. Provision should be a mix of on and offsite where fully onsite provision would result in a taller building with greater negative impact on the landscape.
Attached files	
Agent	CBRE
Respondent	Harris Family (Julian and Nicola Harris)
Comment ID	LPDMPMM/44
Main Modification	MM3 Policy P6/P7: Biodiversity in New Developments
Comment	Policy Paragraph 1 and Paragraph 4.16: The introduction of 'subject to the delivery of other planning policies' is supported at Policy Paragraph 1 and Paragraph 4.16. This allows for greater flexibility where achieving a high Biodiversity Net Gain (BNG) could adversely impact other policy aspirations such as the delivery of housing, affordable housing, or amenity space.

Paragraph 4.16: As noted throughout our previous representations, the minimum 20% biodiversity net gain requirement exceeds the national BNG Environment Act requirement. Whilst we are supportive of the inclusion of viability within paragraph 4.16, it is considered that the modifications to paragraph 4.44 should also reference that the viability will be taken into consideration on a site by site basis.

Attached files

[CBRE Representations GBC DM Policies Main Mods FINAL.pdf](#)

MM4 Policy D14: Carbon Emissions from Buildings

Agent				
Respondent	Normandy Parish Council (Mrs Briony Howarth)			
Comment ID	LPDMPMM/16			
Main Modification	MM4 Policy D14: Carbon Emissions from Buildings			
Comment	<table border="1"><tr><td>MM4 D14</td><td>All changes</td><td>The changes proposed weaken the Carbon Reduction commitments for all dwellings, and especially other buildings. It is recognised that the Building Regulations Target Emission Rates are now in force, but this does not prevent GBC pushing for higher reductions. The changes appear to remove the requirement for the TER to apply to other buildings. This should be re-instated so the TER applies to all new developments, whether dwellings, offices, retail or other uses.</td></tr></table>	MM4 D14	All changes	The changes proposed weaken the Carbon Reduction commitments for all dwellings, and especially other buildings. It is recognised that the Building Regulations Target Emission Rates are now in force, but this does not prevent GBC pushing for higher reductions. The changes appear to remove the requirement for the TER to apply to other buildings. This should be re-instated so the TER applies to all new developments, whether dwellings, offices, retail or other uses.
MM4 D14	All changes	The changes proposed weaken the Carbon Reduction commitments for all dwellings, and especially other buildings. It is recognised that the Building Regulations Target Emission Rates are now in force, but this does not prevent GBC pushing for higher reductions. The changes appear to remove the requirement for the TER to apply to other buildings. This should be re-instated so the TER applies to all new developments, whether dwellings, offices, retail or other uses.		
Attached files				
Agent	LRM Planning Ltd.			
Respondent	Hallam Land Management Ltd (c/o agent c/o agent)			
Comment ID	LPDMPMM/26			
Main Modification	MM4 Policy D14: Carbon Emissions from Buildings			
Comment	Please refer to the accompanying Representations. [Text of representation reproduced below]			

	<p>Hallam welcome the modifications proposed to this policy, which do not require carbon emission reductions which do not align with the national approach and timescale. The removal of specific criteria for this reduction ensures that the policy is no longer at risk of becoming outdated with any changes to the Building Regulations. However, Hallam maintain the opinion that this policy is unnecessary as it duplicates the requirements set out and controlled by the Building Regulations. This policy should be deleted, and matters regulated at a national level.</p>
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Attached files	
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	230201 Development Management Policies Main Modification Consultation_.pdf
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MM5 Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

Agent	
Respondent	Mr John Gentleman
Comment ID	LPDMPMM/2
Main Modification	MM5 Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Comment	<p>The inspectors modifications seem to make the document more reasonable in general.</p> <p>Regarding cycle and pedestrian ways' and conflict between the two groups, (I fall into both groups) most folk will give and take but bad manners in both groups are seen on occasion. Can I suggest a few polite signs reminding folk of equal right of way and to be kind to each other. Thanks for reading this.</p> <p>John Gentleman. 18-12-22</p>
Attached files	

Agent	
Respondent	Guildford Green Belt Group (Mrs Catherine Young)
Comment ID	LPDMPMM/10
Main Modification	MM5 Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Comment	<p>Guildford Greenbelt Group wish to comment of the following:</p> <p>Reference paragraph 6.91: Additional lighting adds to the local energy requirement (and Council tax) when we should be trying to reduce this as part of the Climate Emergency. Lighting can have a negative impact on biodiversity - both flora and fauna - and spoils naturally dark skies areas, of which we have several notable areas across the Borough and designated in Neighbourhood Plans. We are also extensively covered</p>

	<p>by the AONB.</p> <p>Where it says that infrastructure should be integrated we would like the following added:</p> <p>Infrastructure should be integrated, well signed (<i>avoiding street clutter</i>), lit (<i>in exceptional circumstances</i>) with high quality surfaces etc...</p>
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Attached files	
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Agent	
Respondent	Surrey County Council (Sir or madam)
Comment ID	LPDMPMM/29
Main Modification	MM5 Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Comment	<p>At MM5 there is reference to low traffic neighbourhoods. As detailed in Local Transport Plan 4, Surrey County Council is making use of the term Liveable Neighbourhoods.</p> <p>The Healthy Streets for Surrey Design Guide was adopted by Cabinet as County Council policy in October 2022. It sets out the standards the County Council will be seeking when considering development proposals and in delivering public realm schemes.</p>
Attached files	

Agent	Barton Willmore
Respondent	Martin Grant Homes
Comment ID	LPDMPMM/34
Main Modification	MM5 Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

Comment	<p>We support the proposed modification to paragraph 1) of Policy ID10, and corresponding changes to the supporting text at paragraph 6.85, to make clear that Comprehensive Guildford Borough Cycle Network will be the starting point only for the identification of improvements and that the majority of routes have only been established at a concept level, with further feasibility and design work to be undertaken. As we have commented within earlier representations, sites should not be required to deliver new routes which are outside of their land control. In this regard, the proposed change is welcome in that it allows for greater flexibility in providing these routes should the drawn routes not be possible due to land ownership or design constraints.</p> <p>Paragraph 2) of the policy reiterates the need for cycle infrastructure requirements identified within site allocation policies to be delivered. This is superfluous given site-specific requirements are already set out within allocation policies, with clear reference to the relevant policy and statutory tests. Paragraph 2) also refers to the potential for further requirements to be identified as part of the planning application process, without providing any clarity or certainty on how and why additional requirements may be proposed, and so is not effective. Paragraph 2) should therefore be deleted or otherwise expanded to include a footnote referencing Regulation 122 of the CIL Regulations and paragraph 57 of the NPPF 2021.</p> <p>We trust that the enclosed representations are duly made and look forward to receiving confirmation of receipt.</p>
Attached files	
Agent	Savills
Respondent	Taylor Wimpey
Comment ID	LPDMPMM/38
Main Modification	MM5 Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Comment	<p>TW support the removal of “basis and” within Policy Paragraph (1) and for the Comprehensive Guildford Borough Cycle Network as represented on the map in appendix A forming the starting point rather than the basis for the identification of improvements. This helps to demonstrate the indicative nature of the Map.</p> <p>TW support the inclusion of “may include” within Policy Paragraph (2). This clearly recognises the role that technical work supporting planning applications can play in reaching optimal solutions.</p>

TW object to the policy text, as follows: For consultation purposes, The indicative mapped routes which comprise the ‘Comprehensive Guildford Borough Cycle Network’ can be found in Appendix A.

TW support the inclusion of “In rural areas, this could include the designation of Quiet Lanes, development of greenways, speed limits or traffic calming measures”, within paragraph 6.80.

TW support the inclusion of “starting point” to describe the map, within paragraph 6.85.

TW support the inclusion of “Further to this, the majority of routes identified have only been established at a concept level and the identification of improvements will, in such cases, require feasibility and design stages to be undertaken. This will involve undertaking road safety auditing and impact assessments, as appropriate, considering any relevant statutory designations”, within paragraph 6.85. TW however would wish to see greater consideration given to alternative routes that serve an equivalent purpose, and consideration given within the text to the review or removal of routes that are unlikely to serve significant identified demand by the average cyclist (the definition contained within GBC LP policy A35).

TW support the amendments proposed within paragraph 6.91, which broadly reflect the suggested additions outlined within Appendix 1 of the TW regulation 19 Examination Statement.

TW support the inclusion of “Shared use facilities may be appropriate in some rural settings such as greenways and Quiet Lanes”, which reflects the suggest additions by TW within Appendix 1 of the Reg19 Examination Statement (Matter 5 Policy ID10) .

Attached files

Agent	CBRE
Respondent	Harris Family (Julian and Nicola Harris)
Comment ID	LPDMPMM/45
Main Modification	MM5 Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
Comment	Paragraph 6.80: The proposed changes to the Paragraph 6.80 seek to clarify that for rural areas, cycle network infrastructure may include

	<p>designation of Quiet Lanes, development of greenways, speed limits and traffic calming measures. The introduction of this wording is supporting.</p> <p>Paragraph 6.93: The statement at Paragraph 6.93 in respect of shared use facilities in rural areas is also supported.</p>
Attached files	CBRE Representations GBC DM Policies Main Mods FINAL.pdf

MM6 Policy ID10: Guildford Borough Cycle Network

Agent	
Respondent	Guildford Green Belt Group (Mrs Catherine Young)
Comment ID	LPDMPMM/11
Main Modification	MM6 Policy ID10: Guildford Borough Cycle Network
Comment	<p>Guildford Greenbelt Group attended the Inspector's Hearings and wish to make the following comments with regard to Appendix A, Guildford Borough Cycle Network (Map):</p> <p>It is not reasonable or sound to add a cycleway along Long Reach, West Horsley. This road is a narrow country lane where two small cars would struggle to pass each other comfortably and has a variable speed limit of 40mph to 30mph as it reaches Farleys Close towards East Lane. This proposed change is purely at the insistence of Taylor Wimpey in order to facilitate their proposed planning application for new homes at the Former Wisley Airfield site (A35). They are NOT creating any new cycle ways. They are instead relying on existing country lanes and roads, all of which are totally inappropriate for the average cyclist. Surely it cannot be acceptable to allow a developer to have a map altered just to facilitate their proposed development.</p> <p>We trust that the Inspector would look carefully at this, and take into consideration that GBC are also NOT supportive of this change.</p> <p>We would also ask the Inspector to note that Ockham Road North is not a dedicated cycleway as indicated on the map - in fact Taylor Wimpey have notably not put this forward as one of their proposed cycleways to Horsley Railway station deeming it unsuitable for cyclists.</p>
Attached files	

Agent	
Respondent	Surrey Police (Mike Jones)
Comment ID	LPDMPMM/18
Main Modification	MM6 Policy ID10: Guildford Borough Cycle Network

Comment	<p>Thank you for your correspondence of 15th December 2022, advising me of the modifications to the local plan for which you seek advice from a crime prevention viewpoint.</p> <p>The following matters are referenced in the Secured by Design, Design Guide, Homes 2019, appropriate section referred to below.</p> <p>https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_update_May.pdf</p> <p>NM5 Cycle networks</p> <p>See section 8 - regarding layout, permeability, and lighting</p>
Attached files	
Agent	Savills
Respondent	Taylor Wimpey
Comment ID	LPDMPMM/39
Main Modification	MM6 Policy ID10: Guildford Borough Cycle Network
Comment	<p>TW support the inclusion of the route along Long Reach, West Horsley.</p> <p>However, TW maintain their objection to this policy on the basis that the Map in Appendix A Comprehensive Guildford Borough Cycle Network continues to include on-road links along Old Lane between Martyrs Green and Forest Road and Ockham Road North between Long Reach and Horsley Station. The evidence base agreed with the County Highway Authority as part of the Wisley Airfield planning application demonstrates that in these locations deliverable cycle improvements capable of being made within the existing carriageways, would be limited in nature and unlikely to be suitable for the average cyclist.</p> <p>Please refer to Figure 2.1 – TW’s suggested revisions to DMP Appendix A, within the TW Reg 19 comment Examination Statement (Matter 5 Policy ID10).</p>

Attached files

MM7 Policy ID11: Parking Standards

Agent		
Respondent	Normandy Parish Council (Mrs Briony Howarth)	
Comment ID	LPDMPMM/17	
Main Modification	MM7 Policy ID11: Parking Standards	
Comment	<p>"the provision of electric vehicle charging will provide at least the minimum requirements set out in the Building Regulations (Part S) Parking SPD; "</p> <p>"the provision of car parking in new residential development in Guildford town centre or suburban areas, for use by residents themselves, will not exceed will have regard to the maximum standards set out in the Parking Standards for New Development SPD; "</p>	<p>"The provision of electric vehicle charging has been changed from Supplementary Planning Document (SPD) 2006 to Building Regulations S, 2010. The SPD provisions will be superceded by the provisions of Building Regulations S. I have explained the difference between the two regulations as below. This change will house builders and others to develop new housing as well as encourage land owners to change the use of the premises. As a result of this , there will be more housing in the area which will put considerable constratints on the available resources and have impact on the environment."</p> <p>"Building Regulations Part S: New Electric Vehicle Charging Rules: Building Regulations Part S provides a requirement for new homes and existing homes undergoing large renovations (of 10 more or dwellings) to have facilities for charging electric vehicles at home that may be parked on associated parking spaces at that home. The document applies to the following projects: -New residential and non-residential buildings -Buildings undergoing a material change of use to dwellings, such as converting a barn into a home -Residential and non-residential buildings undergoing a major renovation where 10 or more dwelling are being created -Mixed-use buildings that are either new or undergoing a major renovation. All buildings undergoing a change of use, such as a barn conversion, will require an EV charger under Part S. Where one or more dwellings with associated parking result from material change of use, then at least one associated parking space per dwelling must have access to an electric vehicle charge point. "</p>
Attached files		
Agent		
Respondent	Surrey Police (Mike Jones)	

Comment ID	LPDMPMM/19
Main Modification	MM7 Policy ID11: Parking Standards
Comment	<p>The following matters are referenced in the Secured by Design, Design Guide, Homes 2019, appropriate section referred to below.</p> <p>https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_update_May.pdf</p> <p>-----</p> <p>NM7 Car Parking</p> <p>Cycle Parking</p> <p>Policy ID11</p> <p>Paragraph 6.98 - The provision of high-quality cycle parking</p> <p>See section 56 – regarding secure external storage facilities and bicycle security</p> <p>Paragraph 6.101 - Allocated parking</p> <p>See Section 16 – regarding secure parking and the Park Mark award.</p> <p>Paragraph 6.121 – Visitor parking</p>
Attached files	
Agent	
Respondent	Merrow Residents' Association (Mr Keith Meldrum)
Comment ID	LPDMPMM/22
Main Modification	MM7 Policy ID11: Parking Standards

Comment	<p>On parking standards we are disappointed that there is no reference to minimum parking standards since they are contained in GBC policies at the present time. This omission is unfortunate since we have severe car parking problems both in Guildford itself and in Merrow. There are no curbs on the number of cars that anyone can own and therefore home owners in Guildford are at liberty to own as many cars as they wish. There is very little free space for roadside car parking in Merrow at the present time making it even more crucial that any new development has adequate on site car parking for the cars that the new residents may own. The availability of on site car parking is becoming even more important as more people work from home or leave their car at home using buses and cycles to get to work. We understand and accept that we need more homes in the Borough but we don't need more car owners seeking on street car parking spaces and overflowing to other areas because of an inadequacy in new on site car parking.</p> <p>One recent example in Merrow makes the point very clearly. An application for the demolition of a house on the corner of Holford Road and Epsom Road, and its replacement with a block of flats, was withdrawn (22/P/00711). This application didn't meet the current minimum parking standard and could have been refused for that reason alone. In the absence of a minimum parking standard the application might have had legs and its approval would have led to additional on street parking in a very busy area of Merrow. It is of course possible that the highways authority would have recommended refusal in any event, as they did, but a minimum parking standard would have put the issue beyond doubt and made it that much more difficult for the applicant to succeed if the application were to go to appeal.</p> <p>-----</p> <p>We also hope that the Inspector might consider a minimum parking standard in areas outside the town centre in Policy ID11.</p>
Attached files	
Agent	
Respondent	Surrey County Council (Sir or madam)
Comment ID	LPDMPMM/28
Main Modification	MM7 Policy ID11: Parking Standards
Comment	<p>As a result of the new Building Regulations, where undercover parking areas (multi-storey car parks, basement or undercroft parking) are proposed, we are requiring that the developer and the LPA liaise with Building Control Teams and the Local Fire Service to understand any</p>

	<p>additional requirements.</p> <p>An update to the Surrey County Council Vehicle, Cycle and Electric Vehicle Parking Guidance (2021) is currently being completed to reflect the new Building Regulations and LTP4 and will include additional guidance on EV charging points, e-bike charging facilities and adaptive cycle parking.</p>
Attached files	
Agent	Savills
Respondent	Taylor Wimpey
Comment ID	LPDMPMM/40
Main Modification	MM7 Policy ID11: Parking Standards
Comment	TW broadly supports all the amendments to the policy which provides for additional flexibility in the interpretation of ID11.
Attached files	
Agent	
Respondent	GRA (Amanda Mullarkey)
Comment ID	LPDMPMM/46
Main Modification	MM7 Policy ID11: Parking Standards
Comment	While being fully committed to a more sustainable Guildford, including being able to travel in and out from the centre in any direction without an individual car, we place on record that we consider the proposed policies on maximum parking standards and the prospects of many major developments with no/minimal parking provision, to be a grave mistake.

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- | | |
|-----------------------|--|
| | <ul style="list-style-type: none">- Schemes need adequate well landscaped, of street spaces for electric vehicles with an appropriate mix of car club and individual vehicles. Vehicles from schemes with inadequate provision are being parked on streets throughout Guildford.- Green landscaping is removed by occupants to create parking spaces. Adequate parking provision and green landscaping are required.- Schemes have inadequate access for drop off and pick up (including buses and taxis), trade vans and space for electric charging. |
| Attached files | |

Other comments (unrelated to Main Modifications)

Agent	
Respondent	Transport for London (Richard Carr)
Comment ID	LPDMPMM/3
Main Modification	Other comments (unrelated to Main Modifications)
Comment	Thank you for consulting Transport for London. I can confirm that we have no comments to make on the Local Plan: Development Management Policies - Main Modifications 2022
Attached files	

Agent	
Respondent	Canal & River Trust (Sir or Madam)
Comment ID	LPDMPMM/4
Main Modification	Other comments (unrelated to Main Modifications)
Comment	Thank you for this recent consultation. I can confirm that the Canal & River Trust have no land or water ownership within Guildford BC and therefore have no comments to make.
Attached files	

Agent	
Respondent	Gatwick Airport Ltd. (Amanda Purdye)
Comment ID	LPDMPMM/5

Main Modification	Other comments (unrelated to Main Modifications)
Comment	<p>Thank you for your email dated 15 December 2022, regarding the above-mentioned planning policy consultation.</p> <p>I can confirm that we have no objections or comments to make with regard to the main modifications 2022.</p> <p>The comments in our previous response dated 13 January 2022, requesting an aerodrome safeguarding policy still stand, see attached.</p>
Attached files	PL Policy Response LGW4651 13-01-22.pdf
Agent	
Respondent	Roger Bower
Comment ID	LPDMPMM/6
Main Modification	Other comments (unrelated to Main Modifications)
Comment	<p>You asked for comment;</p> <p>The only plan I trust which is really to the benefit of Guildford residents is the one outlined by, THE GUILDFORD SOCIETY</p> <p>They have the best architects and designers compared to any the Borough Council employ.</p> <p>But Guildford Borough always think they know best which is why we are in the mess we are today.</p> <p>Guildford Borough Council consists of a disorganised rabble despite the change from a Conservative majority who were bad enough.</p> <p>You lot are no better.</p> <p>Would you please circulate this email to all those responsible for planning.</p>
Attached files	

Agent	
Respondent	Surrey Fire and Rescue Service (Sir or Madam)
Comment ID	LPDMPMM/7
Main Modification	Other comments (unrelated to Main Modifications)
Comment	Having read the main modifications, there are no comments from Surrey Fire and Rescue Service either as a regulator or as a statutory body.
Attached files	

Agent	
Respondent	Rushmoor Borough Council (Sir or Madam)
Comment ID	LPDMPMM/8
Main Modification	Other comments (unrelated to Main Modifications)
Comment	<p>Thank you for consulting Rushmoor Borough Council on the Guildford Local Plan: Development Management Policies – Main Modifications.</p> <p>We have no comments to make at this time, but please continue to notify us of future consultations.</p>
Attached files	

Agent	
Respondent	Highways England (Beata Ginn)
Comment ID	LPDMPMM/12
Main Modification	Other comments (unrelated to Main Modifications)

Comment

Thank you for your email dated 15th December 2022 inviting National Highways to comment on the Main Modifications to the Guildford Borough Local Plan (Development Management Policies) following the Hearing Sessions that took place during November 2022.

The Guildford Local Plan sets the strategic planning policies for the Borough, taking account of key factors such as population and economic growth, climate change and environmental character and the general scale and distribution of new development which is required to meet Guildford's needs to 2034 and contributes to local unmet need in accordance with duty to cooperate requirements.

The Guildford Local Plan was submitted to the Secretary of State for Levelling Up, Housing and Communities with Hearing Sessions taking place during November 2022. A rolling list of action points and amendments from the hearing sessions were requested by the Planning Inspector, known as main modifications, for which further review and comment are required.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals or Policies that have the potential to impact the safe and efficient operation of the SRN, in this case the A3 and M25.

The documents provided for review detail a number of minor changes to the Local Plan text. The text changes are relatively minor, and there are no changes that we would deem have an effect upon the SRN. We therefore have no objection to the proposed main modifications.

Please continue to consult National Highways as the Guildford Local Plan progresses and as further details come forward we would expect to be consulted on individual proposals. We would expect any planning applications submitted for individual sites identified within the Local Plan to be accompanied by a Transport Assessment detailing the impacts of trips generated and distributed onto the SRN, and a Travel Plan detailing measures to reduce the numbers of these trips. There should also be consideration given to the cumulative impact of all Local Plan development proposed in the vicinity when further details are available.

Attached files**Agent**

Respondent	Surrey Police (Mike Jones)
Comment ID	LPDMPMM/20
Main Modification	Other comments (unrelated to Main Modifications)
Comment	<p>Viewing the plan, it appears that there is no reference to public safety in relation to crime and terrorism.</p> <p>-----</p> <p>The following matters are referenced in the Secured by Design, Design Guide, Homes 2019, appropriate section referred to below.</p> <p>https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_update_May.pdf</p> <p>-----</p> <p>Policy ID5 Protecting Open Space</p> <p>See Section 9 – regarding communal areas and play space</p> <p>-----</p> <p>I would ask that planning conditions are considered that developments achieve a Secure By Design Accreditation, this would ensure that these modifications attain appropriate standards that are regulated by Secured by Design and communicated and monitored by Designing Out Crime Officers to ensure compliance.</p> <p>The National Planning Policy Framework demonstrates the government’s commitment to creating safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life.</p> <p>The Crime & Disorder Act 1998 heightens the importance of taking crime prevention into account when planning decisions are made. Section 17 of the Act places a clear duty on both police and local authorities to exercise their various functions with due regard to the likely effect on the prevention of crime and disorder.</p> <p>Please consider giving due weight to theses matters in the Local Plan modifications which would demonstrate your authority’s commitment to</p>

	work in partnership and comply with the spirit of The Crime & Disorder Act.
Attached files	
Agent	
Respondent	Merrow Residents' Association (Mr Keith Meldrum)
Comment ID	LPDMPMM/21
Main Modification	Other comments (unrelated to Main Modifications)
Comment	<p>As an apolitical organisation we are pleased to have the opportunity to comment on the main modifications to the Development Management Policies (DMPs) but at the same time we are extremely disappointed that these modifications do not cover the height of buildings nor make the amendments we were seeking on parking standards.</p> <p>Policy D4. Achieving high quality design</p> <p>We are not alone in seeking a policy on building heights in the Borough. We have suggested such a policy in the various consultations where we have commented and we put this suggestion to the Inspector Mr Reed both before he examined the DMPs in public and also in person when we attended the hearings and discussed our concerns with him. Since that time GBC have approved plans for high buildings on the St Mary's Wharf site (21/P/02232) and the planning committee have refused a planning application for the development of North street (22/P/01336) where the height of the proposed buildings was one of the issues in contention. This should be taken with the concerns raised in Council by our own councillors- concerns that have been brushed aside by officers who have taken the view that constraints on building heights should be addressed on a case by case basis and that the height of buildings can be considered with reference to Policy D4.</p> <p>We submit that the wording in Policy D4 which states that <i>'Development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place. Development proposals should respond positively to the history of a place, significant views (to and from), surrounding context, built and natural features of interest, prevailing character, landscape and topography'</i> is far too inexact and weak. For instance more needs to be said on how the policy defines the use of the words 'understanding of the place' and 'significant views' since such terms are extremely subjective. What we need is clarity for both developers and the local authority and Policy D4 fails to do that so far as the height of buildings is concerned.</p>

We are absolutely clear that Guildford needs a height policy if we are to avoid a plethora of high rise developments. We have two new sites within the town centre with tall buildings (the Solum development and St Mary’s Wharf) and more will follow unless the brakes are applied either with a policy on height or a SPD. As we have indicated a number of apolitical organisations in the town share our view-a view that now has political overtones which does tend to mask the core of the issue. We need a height policy so that developers are aware of what is required at the time that they are considering the financial viability of a site that they are considering purchasing and so that they can include reference to this policy in any viability assessment that they conduct on the development of the site and the number of affordable or social housing homes that they would be able to provide.

We therefore hope that the Inspector can be persuaded to include a modification to Policy D4 so that GBC is required to have a policy on building height that could be achieved through a SPD.

Attached files

Agent

Respondent Historic England (Sir or Madam)

Comment ID LPDMPMM/23

Main Modification Other comments (unrelated to Main Modifications)

Comment
The issues and matters in the consultation document are beyond the remit and concern of Historic England and consequently we have no comments to make at this stage.

Attached files

Agent

Respondent Natural England (Paige Eke-goodwin)

Comment ID LPDMPMM/24

Main Modification	Other comments (unrelated to Main Modifications)
Comment	Natural England have no comments to make on this consultation.
Attached files	
Agent	
Respondent	Waverley Borough Council (Mark McEvoy)
Comment ID	LPDMPMM/27
Main Modification	Other comments (unrelated to Main Modifications)
Comment	<p>This is a general comment not specific to any particular Main Modification.</p> <p>Thank you for the opportunity to comment on the proposed submission development management policies main modifications. As with our responses to previous consultations, Waverley's interest relates to cross-boundary issues. We do not anticipate that any of main modifications would have any cross-boundary impacts. Waverley values joint co-operation with its adjoining boroughs and districts and looks forward to further collaboration in the future.</p>
Attached files	

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