West Horsley Parish Council

Appendix 5a: DRAFT Response to Local Plan Part 2: Development Management Policies

Issues and Preferred Options: Consultation Comments and GBC Responses

Regulation 19 Consultation: Proposed responses

This submission is made by West Horsley Parish Council (WHPC).

We have chosen to present this in a tabular format for ease of reference.

General Observations that we would like noted:

1. **Neighbourhood Plans.** It is disappointing that there is virtually no reference to Neighbourhood Plans throughout the topic papers and suggested policies. Once adopted Neighbourhood Plans are part of the Borough's Development Plan, and carry full weight in the decision-making process. WHPC recommends that the proposed policies should make reference to Neighbourhood Plans and a general reference to these should be provided in the introduction.

GBC Response: NPs are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with. So, replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added.

There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g., design and parking.

2. **Policy P2: Green Belt.** Two issues are frequently debated at Planning Committee – infilling, and proportionality/harm to the openness of the Green Belt for extensions to homes in the Green Belt. In contrast to this, villages no longer in the Green Belt are seeing significant extensions to homes which are quite often totally out of keeping with the local character of our village. GBC has an opportunity here to address these by having policies to support and provide further clarification for Policy P2: Green Belt in the adopted Local Plan (part one). Policy P2 as it exists is open to interpretation and does not provide clear definitions and guidance on these key issues, as well as many others. This does not help Planning Officers who do not have clear guidance to follow.

GBC Response: It is considered the Policy P2 provides sufficient policy context for the decision maker to determine whether a proposal is appropriate in the Green Belt. With regards to infilling, emerging Policy D9 provides additional policy guidance from a design aspect to consider whether proposals are of a sufficiently high-quality design. With regards to extensions and replacement buildings, it is not considered desirable to set a percentage figure for what is considered to be 'proportionate' or 'materially larger'. This assessment goes beyond a floorspace/volumetric calculation. It also needs to be considered spatially, with reference to the massing, scale and general visual perception of the proposal. For this reason, it is considered that the flexibility offered by not having a prescriptive percentage enables the decision maker more scope to consider all aspects of the proposal in arriving at their decision. However, there is a commitment to produce a Green Belt SPD which will provide additional guidance in relation to Policy P2.

3. **Enforcement Notices.** WHPC recommends that a review is made of Enforcement Notices, closed and open, over the last few years. This will enable GBC to ascertain the key issues that reoccur which could be covered by additional policies, or clearer definitions in the policies existing and proposed.

GBC Response: It is considered that the emerging plan addresses the policy content necessary for Guildford. Development Management has been involved in their preparation to ensure that it addresses any policy gaps that are considered to exist.

4. **Dog Related Development – Policy required as per E11 Horse Related Development.** In connection with the comments above re Enforcement Notices it is quite apparent that there are a growing number of dog related activities springing up on local green fields and Green Belt land. This is for dog walking and exercising, and brings with it fencing of fields and associated structures/equipment. Whilst being in favour of growing the rural economy, WHPC feels that this aspect needs managing through a specific policy and licensing.

GBC Response: Policy E11: Horse Related Development has been renamed 'Animal Related Development' and its scope has been widened to cover all animals. The horse specific criteria have been retained separately within the policy, with the inclusion of more general criteria related to all animals.

5. **Residential Design Guide (2004).** This document is mentioned in several places. While still referenced, its dated approach would potentially carry little weight in planning application decisions, especially with the existence of the National Design Guidance. However, the many and varied character areas that make up the Borough of Guildford need to be clearly defined. WHPC recommends that the Residential Design Guide is updated urgently. Again, reference should be to local Neighbourhood Plans.

GBC Response: The National Design Guide provides comprehensive and detailed policy guidance to ensure that development responds positively to its context. Character will be assessed in more detail as part of each individual planning application. The Government has published the draft National Design Model Code with the expectation that local authorities prepare Local Design Codes. This will be prepared however it sits outside of the LPDMP process.

West Horsley Parish Council - Comments on the preferred Policy Options

Topic/Policy	Page Ref	Agree/ Disagree	Comments
Housing	10		
H4: Housing Density WHPC accept this response and acknowledge that Density now sits within D4. The design led approach is welcomed but there must be assurance that this is given sufficient weight in the planning balance to prevent decimation of existing character. A one-page summary/appendix perhaps alongside the Glossary to list and clarify the constraints would be useful as a quick reference.	12	Agree, providing reference is made to Neighbourhood Plans. This policy needs much clearer guidelines and detail – it is too loose.	1. Under the preferred option at point 1c there should be reference to the character of the landscape setting which is equally important. 2. Specific densities for specific 'characters/types' of areas needs to be provided within the proposed policy. 3. Planning Officers are at a disadvantage is there is no guidance on this which leads to highly inappropriate densities proposed by developers with no regard to local character. 4. It would be helpful within this policy to explain why Guildford Borough is so heavily constrained re Green Belt, Woodland etc which will influence density. 5. Reference to Neighbourhood Plans should be included as these give specific local knowledge and density measurements that must be taken into consideration. **GBC Response:** Neighbourhood Plans are adopted in their own right, are part of the Development Plan, carry their own weight and sit alongside the GBC

			Local Plans. The development plan must be read as a whole, so replication in the Local Plan is not necessary. Density issues are now within proposed Policy D4. Criterion (3) states development should respond positively to context, character and landscape. It requires 'appropriate residential densities' that result from a design-led approach, which considers context and local character. Throughout the plan 95 constraints facing Guildford are recognised.
H5: Housing Extensions & Alterations Accept that this policy is well supported by the Residential Alterations & Extensions Guide, 2018, however, WHPC remains concerned that this is not always adhered to by the planning department, especially in relation to proportion and boundary clearances. It is accepted that this is guidance only, not policy, but without further policy protection for the issues that we have faced we believe it needs to be given more weight in balancing decisions. The Green Belt SPD is long overdue. It was mentioned as coming in the LP part 1 but has not yet been produced. Could this be given priority? Recent application issues where a study or home office is added, where it clearly meets the space standards of a bedroom, is enabling developers to achieve higher number of bedrooms	17	Agree if comments are taken into consideration. A policy is needed but there are significant aspects missing that need to be included.	1. There is an opportunity within this policy to tackle the increasing issue that is raised time and time again at Planning Committee over proportionality. It is worth considering the approach other District and Borough Councils take, as GBC is often criticised over its rigid application of some policies. Given that each application is considered on its own merits there could be clearer definitions and more flexibility. 2. A clear policy is needed on outbuildings/sheds/ outdoor offices/gyms etc especially as we will see increased working from home as a result of Covid-19. 3. Roof Extensions need to be included in the same way that Basement extensions are addressed. There are many issues with applications where the owner wishes to convert the roof into a third floor as habitable accommodation, but this can fundamentally alter the street scene and character of the local area as it is introducing a third floor. Clear definition is needed here re what is/is not allowed. 4. Reference is required to Neighbourhood Plans. 5. Clear guidance on this is needed as Policy P2 is open to interpretation. **GBC Response:**

than Housing mix policy H4 and the SHMA as well as NP Policies.			1.The policy as now drafted includes the wording on extensions and alterations taking into account the proportions of the existing building. Each application is determined on its own merits. 2. Outbuildings are not considered as extensions or alterations to a house and are considered separately in planning policy terms. Existing LPSS Policy D1 and emerging policy D4 would apply to outbuildings. 3.Roof extensions would fall for consideration under part one of this proposed policy as they are an extension/alteration. More detailed guidance on roof extensions is provided in The Residential Extensions SPD. 4.Neighbourhood Plans are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts, so replication in the LP is unnecessary. 5. Green belt issues are outside the scope of this policy, however a future Green Belt SPD could provide clear guidance on the application of LPSS Policy P2: Green Belt.
H6: Housing Conversion and sub-division Comments accepted	22	Agree	1. It is paramount that where homes are sub-divided that the local character is respected in the design and finished appearance. 2. This should also be considered in the wider village context and not just restricted to individual roads. **GBC Response:** Acknowledged, although specific response not listed.
Additional comments on Housing Comments accepted			There appear clear guidelines for Housing in Urban Areas and there are polices covering development in the Green Belt and Countryside. But there is no clear policy for Housing in Rural Areas that has been removed from the Green Belt. This aspect needs to be considered. It is important that we do not lose the thrust and specification of the policies in the saved Local Plan 2003 which currently provides clear

			guidance that leaves little open to interpretation. These new policies must do the same. **GBC Response:** All design policies are applicable in all areas. LPSS Policy D1 and LPDMP Policy D9 include specific considerations for villages.
Economy	25		
E10: Rural Development Comments accepted	28	Agree if suggested additions included	1. Countryside – needs a point to include shops that are set up in conjunction with rural business e.g., not farm shops as such, but shops that sell from the premises of the rural activity e.g., Silent Pool Gin and others within the Surrey Hills Enterprise Scheme. 2. Tighter definitions are needed as in the saved 2003 Local Plan. 3. This policy needs to also have reference to the impact of buildings on locally and nationally important views e.g., from the AONB, and reference to the Surrey Hills Management Plan. **GBC Response:** This was covered under point 2) ("Other farm diversification proposals, for example activity centres and arts and craft shops"). Had this policy been taken forward then some aspects of its wording would have been tightened in the final policy, taking account of other representations, however parts of the 2003 Local Plan policies were unnecessary to reproduce as they are either superseded by the Local Plan: Strategy and Sites and/or the NPPF. This is adequately covered by LPSS Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value.
E11: Horse Related Development Comments accepted, but the Enforcement and Legal teams clearly need more resource as there seems	32	Agree if suggested additions included	1. The Policy needs to include a reference to the management of small caravans that often appear on the site of stables or where horses are being kept, which are clearly being lived in.

little progress on the number of enforcement investigations. WHPC are extremely pleased that this policy has been renamed to Animal Related Development as this is an ever-increasing problem locally, with structures, hard standing for car parking, fencing, flood lighting, and other exercise related equipment taking over our green fields.			2. Some structures that are being built in the Green Belt do not have planning permission such as additional stable blocks so this needs to be tightened. **GBC Response:** These are not considered to be animal-related developments. Unauthorised caravans which require planning permission are dealt with by enforcement rather than planning policy.
Additional Comments on Economy See above WHPC acknowledge that you do not need planning permission to work at home, but how do you then control			There is a real need for a Policy on Dog Related Development. Reference the number of Enforcement Notices, the increasing number of structures and associated equipment that is appearing across our countryside and green fields. This needs to be taken under urgent control. **GBC Response:** Policy E11: Horse Related Development has been renamed 'Animal Related Development' and its scope has been widened to cover all animals. The horse specific criteria have been retained separately within the policy, with the inclusion of more general criteria related to all animals. There is no reference to Homeworking which is still a saved 2003 LP Policy E5 – this is significantly more important in the context of Covid-19. **GBC Response:** You do not require planning permission to work at home. Applications for outbuildings/ extensions that might facilitate working from home would need to be judged against other policies including Green Belt/design/alterations and extensions policies (rather than a policy on

conversion of outbuildings, roof-raising for loft conversions, internal readjustments for supposed 'studies' that become bedrooms etc? Are there general space standards for studies/home offices?			the proposed use of that building). Potential impacts on traffic generation and amenity that would be caused through the development/increased usage of the site is also covered by other policies.
Protecting	37		
P6: Biodiversity in New Developments Comments accepted as the changes made have strengthened the policy. WHPC hope that GBC will hold developers to account if they do not deliver on this. WHPC also welcome the referral to site clearance in advance of applications being submitted as we have several examples of this locally.	43	Policy needed but proposed is not strong enough	1. Of grave concern are the facts stated at 4.6 and 4.7 whereby Guildford Borough's situation is significantly worse than elsewhere in the country and nationally. Critical levels have been reached in priority habitats. This needs urgent attention and so the policy wording needs to be considerably strengthened. 2. Biodiversity has not been seen as a priority as stated at 4.24 and it is obvious that during Planning Committee debates it is not given the time of day, even where there is a Neighbourhood Plan Policy to strengthen the case for reducing the impact of loss. 3. Neighbourhood Plans are simply given lip service in this area, as are other local and national policies, with mere conditions added in, putting the onus on the developer to deliver the net biodiversity increases required – but is this ever followed up? 4. There is a lot of good intention but no accountability for delivering, e.g., new tree planting at point 5 is expected to focus on, it should say MUST focus on. 5. A specified net increase in biodiversity should be demanded for **ALL** levels of development, there should not be a get out clause to supply elsewhere in the Borough.

			6. 4.38 refers to OPM but is only given three lines – it pales into insignificance and should have far more detail provided. Guidelines on buffer zones should be given as avoidance strategies. 7. Point 9 in the preferred options needs the lighting element as a separate point, it is not only the impact on wildlife, but also the environment overall and there should be mention here of Dark Skies. 8. Again, reference to Neighbourhood Plans as both West Horsley and Effingham have policies on this. **This policy needs to be much stronger, specific and more demanding.** **GBC Response:** The word expect has been used because there are likely to be some instances where it is not beneficial to group trees together (e.g., where this would fragment a non-arboreal habitat). The use of 'expect' indicates that applicants should do so unless they can demonstrate it is not justified. The policy on biodiversity net gain sets a standard for all levels of development, but not all types of development. Certain types are proposed to be exempt nationally. While we are proposing to increase the amount of gain, we do not think that there is adequate justification to diverge from the national exemptions. OPM is largely not a planning matter as it dealt with through legislation other than planning legislation. It may be a planning matter where it falls on or around a development site and would present a risk to future occupiers of a development. A buffer zone is not necessary as where OPM is identified it must be eradicated. Policy D10a sets out policy that prevents harm from lighting. This includes a reference to neighbourhood plan policy in the supporting text. The Development Plan is read as a whole. Neighbourhood Plans are Development Plan

			documents in their own right and their policies do not need to be referenced in the policy.
P7: Biodiversity Net Gain Comments accepted	52	Agree to an extent	1. As above, this policy needs to be really strong, e.g., 4a) states avoiding impacts on biodiversity as far as possible feels very woolly and open to avoidance and non-delivery. 2. Reference needed to Neighbourhood Plans. **GBC Response:** The mitigation hierarchy has been removed to the supporting text. The phrase "as far as possible" has been removed as this is inherent in the hierarchy. Neighbourhood Plans are part of the Development Plan, carry their own weight and sit alongside the Local Plan. 172 The Development Plan must be read as a whole and appropriate weight given to its component parts. Reference to Neighbourhood Plans in the Local Plan would not alter the weight given to Neighbourhood Plans.
P8: Woodland, trees, hedgerows and irreplaceable habitats Comments accepted and changes welcomed, especially the detailed justification for hedgerows.	58	Agree to an extent	1. At point 4b) the buffer zone of 15m seems very low. 2. There should be clear guidance if there is the presence of OPM. **GBC Response:** The policy sets a requirement for an appropriate buffer at a minimum of 15 metres, in accordance with Natural England standing advice. Where this would not be sufficient, the policy would require a wider buffer. OPM is largely not a planning matter as it dealt with through legislation other than planning legislation. It may be a planning matter where it falls on or around a development site and would present a risk to future occupiers of a development. In these cases, it will need to be eradicated in order to make the development acceptable in health terms. Policy P6 sets a requirement for the control or eradication of invasive species like OPM.

P9: Priority Species and Habitats on undesignated sites	64	Agree	
P10: Contaminated Land	67	Agree	1. As long as the proposed policy does not detract from the guidance and requirements of the NPPF. 2. This is a specialist area and we need to be very clear what we expect this Policy Area can achieve.
P11: Air Quality and Air Quality Management Areas Comments accepted	70	Agree	1. This is obviously an area of significant concern in our Borough. There should clearly be more AQMAs. 2. What are the levels around the Borough? It would be helpful to publish a table of levels and encourage additional monitoring. 3. There is no guidance provided as to how developers will be expected to ensure that air quality is improved. **GBC Response:** The designation of AQMAs is outside the scope of the policy. GBC Regulatory Services are responsible for the collection and publication of data. It is outside the scope of this policy. Standard assessment processes, 'best practice' and 'good principles' are set out in referenced guidance documents. Criteria (4) requires that, where appropriate, applicants must detail the appropriate avoidance and mitigation measures that will be implemented to prevent significant adverse impacts on sensitive receptors from any sources of emissions to air. The avoidance and mitigation measures that may be implemented in a development are numerous and varied. It is considered appropriate for the applicant to propose such measures in the first instance. However, Criteria (8) provides that, where required, planning obligations will be used to secure contributions to measures to tackle poor air quality. Criteria (7) requires that a 'Verification Report' is submitted and approved prior to the development's occupation or use, which demonstrates the measures have been implemented.

P12: Water Resources and Water Quality	74	Agree	
P13: Sustainable Drainage Systems Having three sites allocated in the Local Plan and reading first-hand what mitigation measures developers have been allowed to bring forward, there is heavy reliance on Attenuation Ponds, yet these are at the bottom of the Hierarchy, with no pollution control of environmental benefits provided. Why are we not insisting on more sustainable methods e.g., green rooves? There are 139 new homes approved for Manor Farm in West Horsley and 35 approved at Oaklands Farm – not one single house has a green roof or some of the other more sustainable recommendations.	78	Agree with additions	1. Reference is made to Policy P10, but this should be P13. 2. It would be helpful to include a hierarchy of SuDS options and their effectiveness. 3. Again, there should be reference to Neighbourhood Plans in this section as local situations need to be carefully acknowledged and referenced. **GBC Response:** The SuDS sustainability hierarchy produced by the LLFA has been included. The Development Plan is read as a whole and where a neighbourhood plan is in place its policies will be used to make planning decisions.
P14: Regionally Important Geological/ Geomorphological Sites	82	Agree	
Additional Comments on Protecting			None
Design	84		
D4: Achieving High Quality Design and Local Distinctiveness	87	Agree to an extent	1. This is an extremely important policy area and it needs to ensure that the full spec provided in the 2003 policies is carried forward into these new ones.

The wording in this policy is now more detailed and stronger which is welcomed. It is important that those Neighbourhood Plans coming forward are encouraged to produce Local Design Codes in the absence of an up-to-date Design Guide for Guildford Borough as a whole. The Residential Design Guide is still referred to but, produced in 2004, it needs to be revised.			2. Reference to Neighbourhood Plans should be included under the General Principles point 1. 3. Reference to the existing build form should be included and an element of consideration to space around buildings. 4. All points made are valuable, but it is a little hard to believe GBC will see these through when they have just approved two planning applications that will lead to the building of 31 new homes in West Horsley's Conservation Area, with a density double that of the immediate area. 5. Within 'Character of Development' as well as including town centre views at point e reference should be made to strategic views in Neighbourhood Plans and views from and into the AONB/Surrey Hills Management Plan. **GBC Response:** 1. The content is considered to be covered by the suite of policies included in the LPSS and the emerging LPDMP. These policies have also been prepared in accordance with the NPPF and National Design Guide. 2. The policy requires that development proposals demonstrate a clear understanding of, and respond positively to, issues such as surrounding context and prevailing character. The policy requires that a design led approach is demonstrated at all stages of the design process – this includes when considering the site's layout, and the form and scale of its buildings and spaces.
D5: Privacy and Amenity West Horsley PC notes that there will now be a policy focusing on Light Pollution and Dark Skies which is welcomed. However, we would still like to see some protection against the prolific use of close boarded fencing,	92	Agree	1. Needs reference to respecting and protecting dark skies. 2. Clarity around the use of extensive glazing and the impact on protected areas, whilst also protecting the privacy of occupiers is also required within this policy. 3. Replanting and boundary treatments should be included with in this encouraging native hedges rather than close boarded

especially where it is completely out of character in our village. All the allocated sites approved so far have this as an allowable feature and it is out of character and not environmentally friendly, severally limiting the movement of wildlife across the village and impacting on our established wildlife corridors. This must be addressed.			fencing. Boundary treatments should reflect the local character and blend in with the existing landscape setting. **GBC Response:** The policy requires consideration of the living environment of existing residential properties as well as the living conditions of new properties, including in relation to matters such as privacy and artificial lighting. Emerging Policy D10a addresses issues to do with light impacts and light pollution whilst other design policies ensure that development responds positively to local character and the landscape setting.
D6: Shopfront Design Comments accepted and changes welcomed.	94	Agree. Needs additions	1. The need to respond to local character and setting should be included. 2. Shopfronts should also respect the character and style of the existing building. **GBC Response:** Agreed – The policy has been amended to provide additional emphasis on local distinctiveness and contextual design. This is achieved by: • Citing that shopfronts are required to be designed to a high quality that is responsive to or enhances the character and appearance of their surrounding context. • Having an expectation that their design retains or relates well to the proportion, scale, detailing, period and character of the host building as a whole and the wider street setting. • Expecting that shopfronts that contribute positively to the established character and appearance of the building they form part of, or the surrounding context to be retained. • Expecting the retention of original features and details where they are of architectural or historic interest, or where they contribute to the character and appearance of the street scene.
D7: Advertisements, hanging signs and illuminations	96	Agree	This is very clear and specific

D8: Public Realm	98	Agree	This is very clear and specific
D9: Residential Intensification The policy title has changed to Residential Infill Development. WHPC are concerned as the previous title appeared to cover not just infill development, but also that of windfall and speculative back garden development, as well as the demolition of existing and replacement of new, or sometimes 2/3 on the original plot. To us this is intensification of land use and needs policies to control this. WHPC preferred the old title which was more reflective of the situation within our village. Could it be made clear in this policy that all types of intensification are covered. Policy Point 3 needs to include a reference to respecting the existing street scene, especially as this is 'frontage' development. There should also be specific mention of the need to respect visual separation between	101	Agree	This is very clear and specific 1. A reference to Neighbourhood Plans for particular local requirements is required. This should have been referenced as guidance in the decisions for 19/P/01210 and 20/P/00409 in West Horsley's Conservation Area. It is galling to read this and have had both these applications approved whereby the density for 31 houses at 20 The Street is double that of the immediate surrounding area. **GBC Response:** Neighbourhood Plans are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans. The development plan must be read as a whole and appropriate weight given to its component parts, so additional referencing and weighting to NP within the LP is considered unnecessary. Additional reference to neighbourhood plans to be added to this policy reasoned justification.

buildings, frontage widths, and distances from the road. The Policy should also include a point to ensure that inappropriate sub-division of existing curtilages to a size below that prevailing in the area.			
D10: 'Agent of Change' and Noise Impacts Comments accepted and changes welcomed.	104	Agree	A very welcome policy. 1. Reference could be included on the impact of noise on wildlife and the local environment. **GBC Response:** Criteria (2) has been amended to require that applicants for noise generating uses clearly identify any likely adverse noise effects arising from the proposed development on existing nearby 'sensitive receptors', including potential adverse effects on the natural environment.
D11: Corridor of the River Wey and Guildford and Godalming Navigations Comments accepted and the addition of a Dark Skies/Light Pollution Policy welcomed.	110	Agree	1. Point 5 should make reference to Dark Skies (page 111) **GBC Response:** The matter of dark skies and light impact is addressed in emerging policy D10a Light Impacts and Dark Skies. Given that the plan is to be read as a whole it has been concluded that is not necessary for it to be cited in policy. Instead, this has been referenced with the policy's supporting text.
Additional Comments on Design			None
Climate Change and Sustainability	113		
D12: Sustainable and Low Impact development Comments accepted and changes welcomed.	119	Agree	1. Strong reference needed to the reuse of existing buildings and demolition materials given that construction waste accounts for around a third of the UK's construction and demolition business.

			GBC Response: A reference to the reuse of existing buildings rather than demolition has been added to the policy.
D13: Climate Change Adaption WHPC have noted the comments in response. With particular reference to the element of flooding we are still extremely concerned that the LLFA continue to fail to recognise that surface water levels have significantly increased in our village and obviously those in the immediate locality. Flood maps are out of date and there is no assessment of how surface water will be managed from the cumulative impact of local developments. Developers are not being asked to provide enough adaption and mitigation to address this, e.g., a requirement for green rooves on garages would go some way to address this, and is notably higher up on the SuDS hierarchy than the usual attenuations ponds, which are notably at the bottom of the hierarchy for pollution and environmental protection.	126	Agree	1. Reference required to Neighbourhood Plans SuDS schemes. 2. Given how critical this is, has this policy been benched marked against other Council's policies known to be exemplary in the Climate Change approach? **GBC Response:** The Development Plan includes both the Local Plan and Neighbourhood Plans and is read as a whole so planning decisions must take relevant neighbourhood plan SuDS policies into account in areas where these exist. Officers and members are aware of the work being undertaken in other local authority areas. The Council works closely with other Surrey Local Authorities through the Surrey Planning Working Group and communicates more widely through the Association of Public Service Excellence (APSE) low carbon energy group.
D14: Climate Change Mitigation WHPC welcome the increased requirement for 31% reduction in	130	Agree	As above. GBC Policy name changed to Carbon Emissions from Buildings

carbon emissions. We remain concerned that the recent Manor Farm development in West Horsley for 139 new homes (Allocated Site A37) has been approved, claiming that it will achieve this, but still using gas boilers. Part of site A39 for 35 new homes has also been approved with gas boilers and Site A38 in East Horsley at reserved matters stage, is also gas boilers. By the time these are all built there will be an expectancy from Government to replace gas boilers, so each household will face bills in excess of £10,000 to £15,000 to achieve this, and higher. Why are developers not required to put the necessary infrastructure in place at the start of builds to deliver alternative solutions?			
D15: Large Scale Renewable and Low Carbon Energy Comments accepted and changes welcomed.	132		1. Before commenting on this the process for assessment of these areas needs to be determined, and an indication of where these areas are likely to be located. 2. The focus should be on Brownfield land rather than Green Belt. 3. The likely impact on biodiversity is a significant concern. **GBC Response:** The alternative option that has been taken forward includes criteria that will be used in the assessment of proposals for renewable and low carbon energy development. Additionally, the plan includes policy covering heritage, Green Belt, landscape and other matters which will

			apply. The point about biodiversity is acknowledged. A key issue for solar farms is management of the site, and has been addressed in the policy. Biodiversity is protected more broadly through biodiversity policies in the plan.
Additional Comments on Climate Change			None
Historic Environment	136		
D16: Designated Heritage Assets Comments accepted.	142	Agree but see note	More emphasis should be put on the setting, including the immediate area outside the curtilage. **GBC Response:** This policy instructs that the supporting information: • must demonstrate a clear understanding of the contribution made by setting to a heritage assets significance; and • explain how the asset and its setting will be affected by a proposal However, supplement to this is a suite of other emerging heritage policies all of which contain asset specific policy relating to setting.
D17: Listed Buildings Comments accepted.	148	Agree but see note	Should also reference Neighbourhood Plans and the character area assessments in taking decisions particularly with regards to settings of listed buildings within settlement areas. **GBC Response:** Disagree – The plan needs to be read holistically. Emerging policy D4: Achieving High Quality Design and Respecting Local Distinctiveness provides references to Neighbourhood Plans therefore it is considered to not be required in policy here. The same can be said for Conservation Area Character Appraisals, as emerging policy D18: Conservation Areas makes provision for them within the supporting text.

D18: Conservation Areas Comments accepted and changes welcomed. Note – we are not sure what has happened to our CACA which had been consulted on but seems to have disappeared. We now have a 30 plus housing estate in the middle of our Conservation Area (part of Site A36) that seems to go against the principles of many of this new policy, so the policy is welcomed for future protection.	152	Agree but see note	1. Should refer to Neighbourhood Plans. 2. GBC should take note of its own policies when taking decisions that impact on Conservation Areas, particularly with regard to density and keeping open spaces. 3. West Horsley has had a Conservation Area Character Appraisal but is stuck between the end of consultation and adoption, the Policy should ensure that all future Appraisals are included not just those listed. 4. Particular reference to methods of boundary identification between properties with recommendation that no close boarded fencing is used and only native species planted. **GBC Response:** Disagree – Emerging policy D4: Achieving High Quality Design and Respecting Local Distinctiveness provides references to Neighbourhood Plans therefore it is considered to not be required in policy here. The supporting text provides a complete list of all Conservation Areas. It also addresses and provides clarity on what steps are to be taken, by both applicants and the Local Planning Authority, in cases where a Conservation Areas does not currently benefit from a Conservation Area Character Appraisal. As each conservation area has its own unique character it would be unfair of the policy to categorically prohibit close boarded fencing and state that only native species hedging is planted. For example, closed boarded fencing is likely to be deemed more appropriate in the more suburban conservation areas of the borough. Further still, in areas that are not restricted by an Article 4 Direction, property owners will still be able to undertake works to their boundaries under their permitted development without any limitations to design and material palette of these constructions. Therefore, the emerging policy has been designed

			to account for the variances in character across each of the conservation areas by focusing on local distinctiveness. Notwithstanding, the above the supporting policy text does provide a reference to the emerging biodiversity policy - Policy P6/P7: Biodiversity in New Developments, in relation to proposed planting and landscape schemes.
D19: Scheduled Monuments & Registered Parks and Gardens Comments noted.	157	Agree but see note	Views from Registered Gardens and Parks should be protected as much as views into them. There are places where an historic park has been broken up in the past but the surrounding area still retains elements of that setting and it needs to be protected. **GBC Response:** The policy has been amended to give additional emphasis to the matter of setting and views. It now cites that development proposals are required to demonstrate that, amongst other things, it causes no unacceptable harm to setting, and that it respects the integrity of landscape and key views.
D20: Non-Designated Heritage Assets	162	Agree	
Additional Comments on Historic Environment			None
Infrastructure	168		
ID5: Protecting Open Space Comments noted and changes welcomed.	170	Agree with additions	1. Point 4, page 171 needs clarifying. 2. This policy should emphasise that the loss of open space will be resisted and that provision will be positively encouraged. 3. Reference to Neighbourhood Plans should be included. 4. Reference to Local Green Spaces must be included – this level of designation has the same value as Green Belt and cannot be ignored, especially as these spaces are identified through Neighbourhood Plans.

			GBC Response: The last criterion of the policy supports development which would improve or help to maintain an open space. Examples could include engineering works to improve drainage or new or upgrades to existing facilities, such as a cricket pavilion. Explanation has been added to the supporting text. Policy ID5 and paragraph (8) of LPSS Policy ID4: Green and blue infrastructure both protect open space in line with the NPPF. Policy ID6 sets out requirements for provision of open space alongside new residential developments. Neighbourhood Plans are development plan documents of equal status to the Local Plan. Where they identify Local Green Spaces, they are protected by the NPPF and usually also by neighbourhood plan policy and do not require further protection or clarification of NPPF provisions. Local Green Spaces cannot be treated the same way as other forms of open space because the NPPF allows open space to be developed in specific circumstances and does not apply those same exceptions to Local Green Space. Reference to Local Green Space has been added to the supporting text to clarify this.
ID6: Open Space in New Developments Comments noted and changes welcomed.	173	Agree with additions	1. Crucial to provide space for new communities and links to other open spaces via the establishment of green networks/infrastructure. 2. Reference should be made to increased wellbeing for residents and the value of the outdoors. **GBC Response:** Supporting text has been included that references the value of open space for well-being. We assume this is a comment regarding major applications being defined as 10 or more homes whilst the draft Policy ID6 proposes to

			require contributions for open space for schemes of 11 or more homes. Major residential development is defined in the NPPF as 10 dwellings or more, or a site of 0.5 hectares or more, however the minimum threshold for open space contributions has been set at 11 or more dwellings. This 384 was primarily to tie in with the threshold of 11 or more units in the Government's Written Ministerial Statement UIN HLWS47 on small-scale developers (made on 28 November 2014), below which the statement advised that tariff-style contributions should not be sought from proposed residential development.
ID7: Sport, Recreation and Leisure Facilities	179	Agree	
ID8: Community Facilities Comments noted.	181	Agree with additions	1. Needs reference to Neighbourhood Plans under the Local Strategies and evidence list. 2. Community Facilities should be a requirement of all strategic sites, and housing developments that propose to deliver 500 new homes – thresholds for these needs defining. 3. People need to be able to walk to a shop or get a local paper otherwise the sites will not be sustainable. 4. The value of Community Facilities cannot be emphasised enough – they should be encouraged and promoted at every opportunity to capitalise on the growth of the community spirit as a result of Covid-19. **GBC Response:** The policy sets expectations regarding the location of community facilities such that they are conveniently accessed by intended users via public transport, walking and cycling. Furthermore, the SDF SPD provides an expectation that the strategic sites should be designed as 'walkable neighbourhoods,' with homes located within easy and convenient walking and cycling distance of places and facilities that

			residents need to access on a day-to-day basis, such as schools, local shops, recreation facilities and employment. Expectations with regard to community facility provision (including schools, GP surgeries, community halls) to support development included in the LPSS are already identified in the Plan's infrastructure schedule and the Infrastructure Delivery Plan. Policy on provision is already reflected in the site allocation policies (e.g., community uses, services, new local centre) and requirements (e.g., community building, GP surgery, early years provision) for identified strategic sites. Where justified in terms of the statutory tests, contributions to community facility provision including off-site infrastructure, is sought, and secured via s106 legal agreements. These contributions may be pooled together toward items of infrastructure to address cumulative impacts.
ID9: Retention of Public Houses Comments noted and changes welcomed.	187	Agree	1. Reference to Neighbourhood Plans should be made where local pubs add value to the community and have been identified as assets of community value – there are opportunities for pubs to expand their services to the community and these should be encouraged. **GBC Response:** A reference to the importance of public houses in neighbourhood plans has been added to the introduction alongside the existing wording in relation to assets of community value. In regard to support for other uses for pubs, not all community uses would require planning permission and therefore some would be beyond the remit of planning policy to support. This includes the temporary changes of use to takeaways which is currently permitted development during the COVID-19 pandemic. In nonpandemic times, a change of use to a hot food takeaway would not necessarily be automatically supported.
ID10: Achieving a Comprehensive Guildford Borough Cycle Network	194	Agree	1. Achieving a cycle network across the Borough must be seen as a priority especially given the recent months where the

Comments noted.			emphasis has been on maximising the use of private transport vs public, and increased bike ownership across the Borough. Like it or not, cycling is here to stay and the Borough has a responsibility to provide safe and accessible cycle routes, both for work and leisure. 2. Reference to Neighbourhood Plans should be included where possible cycle ways have been or could be identified. 3. Green networks/infrastructure are critical to our future. 4. Looking at the map, some joined up thinking to make the connections work is obviously required. **GBC Response:** Neighbourhood Plans (NPs) are adopted in their own right. They are part of the Development Plan, carry their own weight and sit alongside the GBC Local Plans (LPs). The development plan must be read as a whole and appropriate weight given to its component parts. Para 30 of the NPPF explains how conflict between policies in the NP and LP is to be dealt with, so replication in the LP is not necessary. Where particularly relevant to a policy area, a reference to neighbourhood plans has been added. There will be reference to NPs in the introduction and within individual policies where they are most relevant – e.g., design and parking. These issues are covered in more detail in LPSS Policy ID4: Green and Blue Infrastructure and Development Management Policy ID8: Public Realm. Surrey CC, as the local Highways Authority, are a key partner in realising this network, who in turn, have influence over the shaping of the network at a county level.
ID11: Parking Standards Comments noted, and additions welcomed, but will it actually address	197	Agree to an extent	1. It is essential that the Borough's Parking Standards are brought up to date as soon as possible, and that they should be in line

and reduce the 'pavement parking' challenges that we are facing in reality within our village?			with SCC. There is no point in any discrepancy between the two. 2. Parking spaces in residential areas outside the town centre are not realistic for 3 or more bedrooms, and certainly should be increased for houses with 4 or more bedrooms, with allowance for the increase car usage among young adults. Two of the new developments proposed for West Horsley are located in unsustainable areas with extremely limited public transport so will be car reliant. **GBC Response:** A bespoke policy on parking standards has been prepared for Guildford borough and is presented in the Reg 19 consultation. This has taken into account representations on the Issues and Options consultation, local car availability by dwelling type and size across the borough, the latest Government policy, guidance and consultation proposals for planning, cycling infrastructure and electric vehicles, as well as local political priorities. We have had regard to Surrey CC's Vehicular and Cycle Parking Guidance (2018) and 2021 update (Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development). Surrey CC's parking guidance is non-statutory guidance. We have analysed Census data to better understand car availability by dwelling type and size across the borough. The Census data showed the average 3 bed household in rural & village areas of Guildford borough having a car availability level of 1.78 cars and 2.48 for 4 or more bedrooms, with lower averages in urban areas. This has led to a composite approach comprising of maximum residential car parking standards in the town centre, suburban areas and strategic sites, and expected standards in rural and village areas, benchmarked at local car availability levels. Further, we have set out an approach to ensure the

			delivery of unallocated (including visitor) spaces which could provide greater flexibility to accommodate the variation in car availability levels between dwellings.
Additional Comments on Infrastructure			1. The measure of the number of dwellings and the associated provision of open space seems inconsistent with GBC's reference to major applications being 10 or more houses. This is out of sync and needs clarity. 2. Opportunities to provide open space should also be seen as an opportunity to reinforce local character and landscape settings e.g., increased provision could offset smaller garden provision. 3. The importance of open space needs to be highlighted with reference to mental health and wellbeing needs, and the growing importance of community space should be acknowledged. 4. Where there is no guidance through the NPPF, GBC could be more demanding of developers to retain the character of our Borough. **GBC Response:** This is addressed through the various design policies. 5. With all these policy proposals there needs to be reference to Neighbourhood Plans. 6. There is no mention of Local Green Spaces. These are not included in P2 so need to be covered within this section of Policies.