



East Horsley

Parish Council

Clerk and Responsible Financial Officer: Mr Nicholas Clemens

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Guildford Borough Council Planning Policy,
Millmead House,
Millmead,
Guildford GU2 4BB

GBC Local Plan Part2, Development Management Policies: *Consultation comments*

This submission is made by East Horsley Parish Council ('EHPC') in connection with GBC's consultation of the proposed Local Plan Part 2: Development Management Policies: Issues & Preferred Options ('DMP').

The DMP consultation raises questions on 38 selected topics, asking whether or not we agree with GBC's preferred option in each case and seeking comments or suggestions on the proposed policy outlines.

The schedule below sets out EHPC's responses on each of these 38 topics. Firstly, however, we comment on two issues which we believe are missing from the DMP:

a) Detailed Green Belt policies are absent from the DMP

Protecting policies within the DMP begin with Policy P6 because P1 to P5 are included within Part 1 of the Local Plan, including Policy P2 on the Green Belt. However, there are no further Green Belt policies included within the DMP document as presented.

This is somewhat strange, given that the main objective of the DMP is to provide more operational details to planning officers beyond the broad policies set out in the Local Plan Part 1. By contrast, for example, 'Historic Environment' is addressed by Policy D3 in the Local Plan Part 1 and subject to extensive national policies but there are no less than five further Historic Environment policies within the DMP (Policies D16 to D20) providing further clarification of Policy D3.

However, for the Green Belt no further detailed policies are included within the DMP to offer additional operational details beyond Policy P2. Given that the Green Belt represents 84% of land within the borough and is a complex subject frequently addressed in planning applications, we find it hard to understand why this approach is being taken.

b) Neighbourhood Plans are largely ignored

There is hardly any mention of Neighbourhood Plans throughout the entire DMP. Only one policy, Policy D9, acknowledges Neighbourhood Plans with the brief comment “...and as appropriate within Neighbourhood Plans.” There are also brief references to parking policies within the Effingham and Burpham Neighbourhood Plans, since they offer a partial model for DMP Policy ID11.

Currently there are 10 Neighbourhood Areas approved within Guildford borough with four adopted Neighbourhood Plans and the remainder at various stages of approval. By the time the DMP is adopted, it is likely that the majority of areas outside of the Guildford metropolitan area will be covered by Neighbourhood Plans. Neighbourhood Plans are part of the Local Development Plan and are regularly cited in ongoing planning assessments. Therefore, it would seem logical for the DMP to include some references of them, particularly since many Neighbourhood Plans address a similar range of issues to those dealt with in the DMP.

In the schedule which follows we suggest particular policies in the DMP which would benefit from reference to Neighbourhood Plans, although in reality such references could potentially be included within almost every policy.

Yours sincerely,

N.S.Clemens

Mr Nicholas Clemens,
Clerk & Responsible Financial Officer,
East Horsley Parish Council

GBC DEVELOPMENT MANAGEMENT POLICIES: Consultation comments

a) HOUSING

Question 1: Housing Density (Policy H4)

We agree with the aims and requirements of Policy H4 as proposed in the Preferred Option with one exception:

Paragraph 2 of Policy H4 requires 'higher density development' at the strategic sites. However, we do not agree that this should be a presumption within this policy. The NPPF requires the 'efficient use of land' but this is not the same thing as requiring the largest possible number of houses to be built upon it. The supporting text argues that strategic sites because of their scale can establish their own character - it is assumed therefore they can effectively ignore the character of their surrounding areas in this process. We believe this argument is fallacious. The GBC strategic sites are not of such a vast scale that they can be established without any reference to the general character (and hence density) of their surrounding communities. Some of these surrounding communities are high density urban settlements, but some are low density rural villages. As such we believe there should be no automatic presumption towards high density development at the strategic sites under this policy.

SUGGESTION:

Delete the words 'strategic sites' from Paragraph 2 of Policy H4.

Question 2: Housing Extensions & Alterations (Policy H5)

We agree with the aims and requirements of Policy H5 as proposed in the Preferred Option with one exception:

In Paragraph 1(a) there is a reference to respecting the existing context, scale and character of the adjacent buildings and immediate surrounding area. However, we believe the restriction to the 'immediate surrounding area' is too limiting. Around one third of the inhabitants of Guildford borough live in distinctive village settlements away from the main Guildford urban area. In such locations to limit an assessment of a development to its impact on the 'immediate surrounding area' may fail to appropriately reflect the wider general character of a particular village, which we believe should be a relevant contextual factor in any new development within that village.

SUGGESTIONS:

- a) Delete the word "immediate" from Paragraph 1(a) of Policy H5;*
- b) Since parts of Guildford borough have adopted Neighbourhood Plans containing various Design Codes, which form part of their Local Development Plan, a reference to their applicability would also be appropriate within this policy.*

Question 3: Housing conversion & subdivision (Policy H6)

We agree with the aims and requirements of Policy H6 as proposed in the Preferred Option with one exception:

In Paragraph 1(a) there is a reference to supporting housing conversion providing the balance of housing types and character of the 'immediate locality' would not be adversely affected. As discussed in Policy H5 above, we believe the reference to 'immediate locality' should be revised. In village locations to limit an assessment of a development to its impact on the 'immediate locality' may fail to appropriately reflect the wider general character of a particular village, which we believe is a relevant contextual factor.

In addition we believe with flat conversions that the issue of local parking, and in particular the impacts of a new development for on-street parking in the vicinity, are often critical factors in assessing such projects. Whilst we appreciate Parking Standards are also addressed by Policy ID11, because of its particular significance to flat conversions we suggest that including a specific reference to parking would also be helpful within Policy H6.

SUGGESTIONS:

- a) *Delete the word "immediate" from Paragraph 1(a) of Policy H6;*
- b) *Add an extra criterion addressing the sufficiency of off-road parking provisions;*
- c) *Since parts of Guildford borough have adopted Neighbourhood Plans containing various Design Codes, which form part of their Local Development Plan, reference to their applicability would also be appropriate within this policy;*

b) ECONOMY**Question 4: Rural development (Policy E10)**

We agree with the aims and requirements of Policy E10 as proposed in the Preferred Option.

Question 5: Horse-related development (Policy E11)

We agree with the aims and requirements of Policy E11 as proposed in the Preferred Option.

c) PROTECTING

Question 6: Biodiversity in new developments (Policy P6)

We agree with the aims and requirements of Policy P6 as proposed in the Preferred Option.

SUGGESTION:

Since parts of Guildford borough have adopted Neighbourhood Plans which include Biodiversity polices that form part of their Local Development Plan, a reference to their applicability would also be appropriate within this policy.

Question 7: Biodiversity net gain (Policy P7)

We agree with the aims and requirements of Policy P7 as proposed in the Preferred Option.

Question 8: Woodlands, trees, hedgerows & irreplaceable habitats (Policy P8)

We agree with the aims and requirements of Policy P8 as proposed in the Preferred Option.

SUGGESTION:

Since parts of Guildford borough have adopted Neighbourhood Plans containing policies relating to trees and hedgerows which form part of their Local Development Plan, reference to their applicability would also be appropriate within this policy.

Question 9: Priority species and habitats on undesignated sites (Policy P9)

We agree with the aims and requirements of Policy P9 as proposed in the Preferred Option.

SUGGESTION:

Since parts of Guildford borough have adopted Neighbourhood Plans containing policies relating to the protection of species and habitats which form part of their Local Development Plan, reference to their applicability would also be appropriate within this policy.

Question 10: Contaminated land (Policy P10)

We do not support the preferred option in Policy 10 concerning development on contaminated land. This is a highly sensitive subject where critical roles are played by other statutory authorities. For this reason we support Alternative Option 1 to rely upon NPPF and PPG and not to have a specific policy in the DMP for this topic.

Question 11: Air Quality & Air Quality Management Areas (Policy P11)

No comments. Whilst we fully support the aims of improving local air quality and air quality management, we do not feel qualified to give an opinion about the technical details referenced in Policy P11.

Question 12: Water resources & water quality (Policy P12)

We agree with the aims and requirements of Policy P12 as proposed in the Preferred Option.

Question 13: Sustainable Drainage Solutions (Policy P13)

We agree with the aims and requirements of Policy P13 as proposed in the Preferred Option.

Question 14: Regionally important geological/geomorphological sites (Policy P14)

We have no opinion on the Preferred Option for Policy P14.

d) DESIGN & THE HISTORIC ENVIRONMENT

Question 15: Achieving high quality design and local distinctiveness (Policy D4)

We agree generally with the aims and requirements of Policy D4 as proposed in the Preferred Option, with one suggestion:

SUGGESTION:

Since parts of Guildford borough have adopted Neighbourhood Plans containing Design Code policies of various kinds which form part of their Local Development Plan, reference to their applicability would also be appropriate within this policy, eg. as part of Paragraph 1 of General Principles.

Question 16: Privacy & Amenity (Policy D5)

We agree generally with the aims, requirements and considerations of Policy D5 as proposed in the Preferred Option, with one suggestion:

SUGGESTION:

Since boundary screening is an important element for ensuring neighbouring privacy, we suggest it would be helpful to include this item within the list of supporting criterion, potentially with encouragement for green boundary solutions.

Question 17: Shopfront Design (Policy D6)

We agree with the aims and requirements of Policy D6 as proposed in the Preferred Option.

Question 18: Advertisements, hanging signs & illumination (Policy D7)

We agree with the aims and requirements of Policy D7 as proposed in the Preferred Option.

Question 19: Public realm (Policy D8)

We agree with the objectives and requirements of Policy D8 as proposed in the Preferred Option.

Question 20: Residential intensification (Policy D9)

We agree with the aims and requirements of Policy D9 as proposed in the Preferred Option.

We also note that Paragraph 1 of Policy D9 is the only place within the body of the DMP policies which includes the comment: “....and as appropriate within Neighbourhood Plans.”

Question 21: ‘Agent of change’ & noise impacts (Policy D10)

We agree with the aims and requirements of Policy D10 as proposed in the Preferred Option.

Question 22: Corridor of the River Wey & Guildford/Godalming Navigation (Policy D11)

We have no comments on Policy D11.

Question 23: Sustainable & low impact development (Policy D12)

We agree with the aims and requirements of Policy D12 as proposed in the Preferred Option.

Question 24: Climate change adaptation (Policy D13)

We agree with the aims and requirements of Policy D13 as proposed in the Preferred Option.

Question 25: Climate change mitigation (Policy D14)

We agree with GBC’s preferred option for Policy D14 to await the outcome of the Future Homes consultation before GBC propose a policy for this topic.

Question 26: Large scale renewable & low carbon energy (Policy D15)

We agree with the aims and requirements of Policy D15 as proposed in the Preferred Option.

Question 27: Designated Heritage Assets (Policy D16)

We agree with the aims and requirements of Policy D16 as proposed in the Preferred Option.

Question 28: Listed Buildings (Policy D17)

We agree with the aims and requirements of Policy D17 as proposed in the Preferred Option.

Question 29: Conservation Areas (Policy D18)

We agree with the objectives and requirements of Policy D18 as proposed in the Preferred Option.

Question 30: Scheduled monuments & registered parks and gardens (Policy D19)

We agree with the objectives and requirements of Policy D19 as proposed in the Preferred Option.

Question 31: Non-designated heritage assets (Policy D20)

We agree with the objectives and requirements of Policy D20 as proposed in the Preferred Option.

e) INFRASTRUCTURE

Question 32: Protecting Open Space (Policy ID5)

We agree with the aims and requirements of Policy ID5 as proposed in the Preferred Option but we do not believe they are sufficient.

Specifically, we note that Policy ID5 makes no reference to Local Green Spaces as designated by adopted Neighbourhood Plans. This designation represents a strong level of protection given to local spaces by a Neighbourhood Plan, as selected by local residents for their importance and significance, and which may or may not coincide with the spaces as identified by GBC in the OSSRA.

SUGGESTION:

Revise the scope and requirements of Policy ID5 to include reference to Local Green Spaces as designated by adopted Neighbourhood Plans.

Question 33: Open space in new developments (Policy ID6)

We agree with the aims and requirements of Policy ID6 as proposed in the Preferred Option.

Question 34: Sport, recreation & leisure facilities (Policy ID7)

We agree with the aims and requirements of Policy ID7 as proposed in the Preferred Option.

Question 35: Community Facilities (Policy ID8)

We agree with the aims and requirements of Policy ID8 as proposed in the Preferred Option, with one proviso.

Specifically, we note that no provision is made in Policy ID8 for the development of community facilities at new Strategic Sites where high demand may put unreasonable pressure on existing local facilities without supporting provision. Cumulative increases in demand from multiple smaller developments within a particular area may also put pressure on existing community services and as such we believe this issue should also be considered as part of this policy.

SUGGESTION:

A policy on the provision of local community services should be a requirement for all Strategic Sites.

Question 36: Retention of Public Houses (Policy ID9)

We agree with the aims and requirements of Policy ID9 as proposed in the Preferred Option with one additional suggestion.

Notwithstanding the important role that pubs can play within communities, their rate of closure suggests many are facing viability issues. For pubs outside of the town centre, the weight of evidence should be towards demonstrating whether a pub can be viable in the long term or not (e.g. either by a developer or the community through an ACV business plan).

SUGGESTION:

Redevelopment or change of use of public houses should only be resisted if a pub can be demonstrated to be viable over the long term.

Question 37: Achieving a comprehensive Guildford borough cycle network (Policy ID10)

We agree with the aims and requirements of Policy ID10 as proposed in the Preferred Option.

We also support the inclusion of the GBC Route Assessments Feasibility Study to create a denser cycling network although we note there are significant gaps outside of the urban area. However, in our opinion the policy does not do enough to ensure the general safety of cyclists. Cycle network provision outside of the urban area needs to be given greater consideration to ensure the safety of cyclists.

SUGGESTION:

This policy should also include provision for improving the safety of cyclists, (e.g. cyclist & driver education and publicity, road surface improvements, etc.)

Question 38: Parking standards (Policy ID11)

We agree with the aims and requirements of Policy ID11 as proposed in the Preferred Option with two suggestions:

SUGGESTIONS:

a) We are uncertain whether the specific charging requirements set out for Electric Vehicles will continue to be realistic in the face of rapidly changing technologies. It may be more effective simply to have a policy which refers to best industry practise at the time;

b) Since parts of Guildford borough have adopted Neighbourhood Plans containing policies relating to car parking standards which form part of their Local Development Plan, reference to their applicability would also be appropriate within this policy.

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