

**RESPONSE TO GBC CONSULTATION ON DEVELOPMENT MANAGEMENT POLICIES**

**Q1 H4: Housing density**

We support the inclusion of a policy on housing density and agree with the broad aims set out in H4. However, the absence of any specific guidance on acceptable ranges of density is unsatisfactory and we wish to see more definition of what is and is not acceptable.

We are concerned about the height of development particularly in the town centre, and have advocated a limit of six storeys. We suggest specific mention of visual impact and height as factors to be taken into account in 'context and local character'.

NPPF para 123(b) says 'it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range'. Given the varied character and density of housing across the borough, density ranges could be set based on the prevailing density of existing settlements as identified in the Landscape Character Assessment and Guidance 2009, and proximity to a transport hub.

**Q2 H5: Housing extensions and alterations**

We welcome the inclusion of this policy. We note that the Extensions and Alterations SPD 2018 is referenced. 1(b) raises the question of what would constitute 'unacceptable impact'. Are there minimum standards that can be referenced? We propose that 1(c) should include specific mention of materials.

**Q3 H6: Housing conversions and subdivisions**

We welcome the inclusion of this policy. We wish to see the addition of reference to the application of minimum space standards. There should be adequate provision for storage, e.g. bicycles, parking, and we urge the adoption of minimum external amenity standards.

**Q4 E10: Rural development (including agricultural diversification)**

We agree with the need to include a policy dealing with rural development. The problem with the text of E10 is the degree of conditionality – as in 'the policy might support...' and 'the policy could support...'. The policy should be more specific about the criteria.

Please add 'light pollution' to noise in the paragraph starting 'New buildings in the countryside..' under the Countryside heading.

**Q5 E11: Horse related developments**

We support the inclusion of this policy. It would be helpful to specify all the government standards and guidance that apply to such development and the advice from reputable industry organisations. We would like to see lighting of external arenas added to the list of potential detrimental effects in 2(d), and the issue of manure warrants special mention – including 'smell' is not sufficient.

**Q6 P6: Biodiversity in new developments**

We support the inclusion of this policy. Please spell out 'Biodiversity Opportunity Area' when BOA is first mentioned. We suggest a reference to a borough level map of BOAs (i.e. more detailed than the county map shown in Policy ID4).

In 6), there should be mention of 'roosting' as well as 'nesting'.

Q7 P7: Biodiversity net gain

We agree that it is worthwhile to include this policy, expanding on the requirement in Policy ID4. Given the uncertainty over the Environment Bill, the approach adopted is sensible. We support the requirement for a net gain of at least 20%, while noting that this will focus attention on the assessment of the existing situation.

Q8 P8: Woodland, trees, hedgerows and irreplaceable habitats

We support the inclusion of this policy. In the application of the policy, it is likely that the definition of what is 'irreplaceable' will be significant. Does Surrey Nature Partnership hold a list of such habitats in the borough? Clearly, SNP does identify SNCIs and other important sites, but at what stage are they identified as irreplaceable?

Q9 P9: Priority species and priority habitats on designated sites

We support the inclusion of this policy. Affording protection on undesignated sites is welcome.

Q10 P10: Contaminated land

We support the inclusion of such a policy. The wording would benefit from being more definite, as for example:

'1. Where development is proposed on land that is known or suspected to be contaminated, including land which is suspected of being affected by contamination from adjacent land, then:

- a) the full nature and extent of contamination must be established...
- b) where evidence of contamination exists, the land must be made fit...
- c) appropriate remedial measures are to be included...
- d) prior to either occupation or use, a 'Verification Report' shall be ...'

Q11 P11: Air quality and Air Quality Management Areas

We support the inclusion of this policy. However, the planned growth in the LPSS is likely to have an adverse impact on air quality across the borough, which is at odds with the aim of reducing exposure to poor air quality. With this in mind, we suggest revision of the wording of the first statement as follows:

'1) Is designed to minimise the potential adverse impact of development on health and quality of life from air pollution.'

In the justification statement, there is reference to the Air Quality Action Plan 2019,<sup>a</sup> which was concerned with the Compton AQMA, rather than the whole borough.

Q12 P12: Water resources and water quality

We support the inclusion of this policy. '1) Opportunities...' should perhaps read '1) Ensures that opportunities...'. The policy is focused on new development, but the issue could arise where there is a change of use such as conversion of offices to residential.

Para 4.137 explains that this policy is focused on water quality. We are also concerned about water supply, given the scale of development planned in LPSS, and the fact that the borough is in an area of severe water stress. How will this be addressed?

Q13 P13: Sustainable Drainage Systems

We support the inclusion of this policy. It serves to reinforce the requirement set out in LPSS Policy P4. The consequences of climate change and with the potential increase in risk of flooding add to the significance of SuDS.

Q14 P14: Regionally Important Geological/Geomorphological Sites

The objective of this policy is supported. We note that there is a link with other policies concerned with biodiversity – is P14 consistent with the requirements in P6 and P7?

Q15 D4: Achieving a High Quality Design and Local Distinctiveness

We regard this policy as essential. We support the policy objectives. Under General Principles, the wording of 1) could usefully be strengthened by changing ‘have regard to’ to ‘comply with’. And we recommend including specific mention of Nationally Described Space Standards after ‘other guidance’, as a way of dealing with minimum space requirements.

Given the inclusion of ‘local distinctiveness’ in the title, we suggest that mention should be made of Neighbourhood Plans, and also the council’s Landscape and Townscape Character Assessments as being relevant considerations.

Q16 D5: Privacy and Amenity

We support this policy in principle. However, the provisions are non-specific and that could prove unsatisfactory in their application. So we would prefer to see the council set minimum standards for external amenity as has been done by other authorities.

Q17 D6: Shopfront Design

We agree with the preferred option.

Q18 D7: Advertisements, hanging signs and illumination

We agree with the preferred option.

Q19 D8 Public Realm

We support the inclusion of this policy. We would like to see an addition to the objectives which is designed to seek opportunity for the introduction of green planting. Is objective 6) referring to charging points for electric vehicles? How do vehicles and parking fit into public realm projects?

In objective 2) after ‘user friendly for all’ it may be appropriate to add ‘including the disabled’.

Q20 D9 Residential Intensification

The inclusion of this policy is welcome.

In 1)d) ‘are appropriate’ is redundant. In 1)e) it may be worth adding ‘including cycles’ after ‘parking’, and add ‘external amenity’ as a consideration.

In 2) we would like to see mention of local landscape, and also of ensuring respect for views, particularly in and out of an AONB.

Q21 D10: ‘Agent of Change’ and Noise Impacts

We agree with the preferred option. The policy provides a comprehensive interpretation of how to apply the new Agent of Change guidance.

**Q22 D11: The Corridor of the River Wey and the Guildford and Godalming Navigation**

We agree with the preferred option. 2) includes ‘walkways and/or cycle routes..’. This might be rephrased to have walkways as the primary aim, with cycle routes where appropriate.

We request the inclusion of a requirement to take views into account. In the town centre, there is an SPD to cover this point, but the issue is important for the whole length of the river in the borough.

**Q23 D12: Sustainable and low impact development**

We agree with the preferred option. The requirements are necessary and may need to evolve over the life of the plan as regulations and technology change. We suggest that consideration be given to extend the coverage to include repurposed buildings to improve sustainability as far as is practicable.

**Q24 D13: Climate Change Adaptation**

We support the inclusion of this policy. There will be a growing need to add specificity to D2 for implementation. It would perhaps be helpful to add a suitable reference for ‘cooling hierarchy’.

Does ‘scheme’ here refer to all projects, irrespective of size?

**Q25 D14: Climate Change Mitigation**

We accept that it is better to wait for central government to clarify the position. The policies and regulations covering energy efficiency, insulation, ventilation etc will surely require collation and checking for consistency in due course.

**Q26 D15: Large-Scale Renewable and Low-Carbon Energy**

We prefer the alternative option, i.e. to not allocate land for such developments but to have a general policy with criteria that prevent negative impacts.

**Q27 D16: Designated Heritage assets**

We agree with the preferred option. We propose that in 1) ‘Expects...’ should be changed to ‘Requires...’.

**Q28 D17: Listed Buildings**

We agree with preferred option. We are keen to see a stronger commitment to protecting list buildings from demolition and to protecting the setting of listed buildings, as provided for by the 2003 Plan policies HE3 and HE4.

**Q29 D18: Conservation Areas**

We agree with the preferred option. We want greater use of Article 4 Directions as a way of increasing protection. They should cover listed buildings as a matter of course.

[Editing point in 3) ‘compliments’ should be ‘complements’]

**Q30 D19: Scheduled Monuments & Registered Parks and Gardens**

We agree with the preferred option.

**Q31 D20: Non-Designated Heritage Assets**

We agree with the preferred option. The link to Neighbourhood Plans in 2) is welcome.

Q32 ID5: Protecting Open Space

We agree with the preferred option. It is recommended that 4) is strengthened by adding ‘...and does not harm its character or the local environment (by light pollution, for example)’.

Q33 ID6: Open Space in New Developments

We support the preferred option, with reservations. It is not clear how ‘best value in terms of multi-functional benefits’ will be measured. Why is the play space standard for ‘youth’ only 0.03ha?

We think that small developments should provide play space for children

Q34 ID7: Sport, Recreation and Leisure Facilities

We agree with the preferred option. Are there sufficient safeguards elsewhere in other policies to guard against impacts arising from lighting and noise, for example? If not, we argue for their inclusion here, and in particular we urge that AONB is protected.

Q35 ID8: Community Facilities

We agree with the preferred option. It is noted that the range of facilities covered in the definitions is extensive. We question whether 3)c) is strong enough to ensure alternative provision. Does ‘made available’ mean the same as ‘provided’ in this context?

Q36 ID9: Retention of Public Houses

We agree with the preferred option.

Q37 ID10: Achieving a Comprehensive Guildford Borough Cycle Network

We agree with the preferred option. There needs to be clarity in the policy about what is the definitive ‘cycling plan’ and ‘cycle network’, or simply reference to the finalised Policies Map.

Q38 ID11 Parking Standards

We agree with the preferred option for parking standards. The distinction between the town centre and new residential developments outside the centre, as set out in aims 1) and 2) is welcome. We support policies that help minimise on-street parking.

How should parking for car clubs be dealt with?

Table 5 dealing with parking for non-residential development includes reference to ‘town centres’ in A3, A4 and A5. Should this refer to the Town Centre, as elsewhere in the document?

Table 6 dealing with cycle parking covers provision for flats/houses without garages or gardens. In such cases, what constitutes a parking space?

We support the inclusion of a requirement for electric vehicles charging points as set out in Table 7. How will the implications for power supply requirements be assessed and managed?

Q39 Additional comments

These policies contribute to the framework for development, which involves the Strategy and Sites policies, and the SPDs. The inter-connections are complex, and many matters are addressed in all three levels of the hierarchy. To help keep track, we suggest that the Topic Papers produced for the LPSS examination, e.g. on Green Belt and Countryside, Transport etc., are regularly updated.