Burpham Neighbourhood Plan

2015–2035

BNF 11: Consultation Statement

Part 2 of 4

The Neighbourhood Planning (General) Regulations 2012

Regulation 15 (2) (c) documentation

October 2014

Reg. 14: Consultation Responses
15. (1) Where a qualifying body submits a plan proposal to the local planning authority, it must include—

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<td>1</td>
<td>(a) a map or statement which identifies the area to which the proposed neighbourhood development plan relates; This can be located in Appendix 1 of the Policies (BNF 2)</td>
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<td>2</td>
<td>(b) a consultation statement; This document See also documents BNF 10, 12 and 13</td>
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<td>3</td>
<td>(c) the proposed neighbourhood development plan; and The Policies document (BNF 1 and Appendices)</td>
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<td>4</td>
<td>(d) a statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act. This document (BNF 9)</td>
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<td>5</td>
<td>(2) In this regulation “consultation statement” means a document which—</td>
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<td>6</td>
<td>(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan; Consultation statement Part 1: Details of Contacts, Calendar of events &amp; Publicity</td>
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<td>(b) explains how they were consulted; (BNF 10)</td>
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<td>8</td>
<td>(c) summarises the main issues and concerns raised by the persons consulted; and This Document plus Consultation responses. (BNF 13)</td>
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<td>9</td>
<td>(d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan. Explanation of modifications to policies, after consultation with: Relevant bodies, Members of the public and Commercial entities. (BNF 12)</td>
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Please Note!

Policies marked ‘Obs/Obsolete’ were deleted from the plan following the Regulation 14 Consultation and further consideration of the responses and relationships with other policies in the plan.

In addition a number of policies were retained but renamed.
Introduction
This document contains the responses from the Regulation 14 consultation. The policy numbers and content of those policies therefore reflects the wording of the draft policies at the start date of the Regulation 14 Consultation. Therefore, they are different to those policies presented in this Regulation 15 submission. The differences reflect the amendments and changes suggested and advised by the various responders’. In some cases, the changes have resulted in the deletion of a Policy in its entirety, which are included below where relevant. Other polices have been merged, renumbered or re-ordered to form a numerically correct and logical sequence of policies within the final submission documents.

Text of Legal Notification for Section 14 letter
The following text was distributed by letter to every household in Burpham at the start of the Regulation 14 Consultation.
2nd June 2014
Dear Burpham Resident,
Burpham Neighbourhood plan pre-consultation and publicity stage (section 14 neighbourhood planning General planning regulations 2012)
I am delighted to present for pre-submission consultation and publicity the Burpham Neighbour Plan 2014 – 2034. This is a formal process we are required to undertake prior to submission of the Neighbourhood plan to Guildford Borough Council. This process must meet certain requirements which are described below, along with details of how these requirements are being met.
14. before submitting a plan proposal to the local planning authority, a qualifying body must —
Publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area —
Details of the proposals for a neighbourhood development plan;
The Burpham neighbourhood forum has prepared a comprehensive neighbourhood plan entitled ‘Burpham Neighbourhood plan 2014 – 2034’. Covering issues such as Standards of Environment and Land use development, Parking, Community uses and Local Green spaces, amongst others. Please refer to the plan for further details.
Details of where and when the proposals for a neighbourhood development plan may be inspected; on the web site 24 hours a day at:
http://www.burphamneighbourhoodforum.org/index.html
Electronic copies of the can be obtain by Email request to jim.allen1@talktalk.net.
Hard copy of the plan can be obtained for the charge of £30.00 please email to arrange payment and dispatch address.
Details of how to make representations; and
By Web site: Representations can be made by submission directly via the web site for each individual policy – please use the comments form on each page.
By Email: to jim.allen1@talktalk.net
By Mail to: The Burpham Neighbourhood Forum, 1 Bowers Cottages, Bowers Lane, Burpham, Guildford, Surrey GU4 7ND.
The date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
Please submit representations by 17:00 on 14th July 2014
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(b) Consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and

Various statutory and other organisations are being contacted as part of this consultation process – a full list can be obtained if required by emailing jim.allen1@talktalk.net

(c) Send a copy of the proposals for a neighbourhood development plan to the local planning authority.

2nd June 2012 an email was sent to; Mr Dan Knowles Neighbourhood planning Officer at Guilford Borough Planning department – a hard copy of the plan has also been submitted to council offices at Millmead.

Overseeing your future!

This is an exciting step in the adoption of the Burpham Neighbourhood Plan which will help guide development for the next 20 years. I strongly encourage you to take the time and opportunity to view the Neighbourhood plan on line, and respond with your views accordingly. If you have any questions please do not hesitate to contact us.

Best wishes
Ros Pollock.

Comments received during consultation

General

Comment Number 2
From Natural England

Statement Where a Neighbourhood Plan could potentially lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats Regulations. One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive.

Action: Recommendation: SEA carried out by GBC and found no policy in the plan requires SEA

Comment Number 7
From Natural England

Statement Local environmental record centres hold a range of information on the natural environment. A list of local records centre is available at: http://www.nbn-nfbr.org.uk/nfbr.php

Action: Recommendation: Contacted: 22/07/14 - no one available until August Surrey Biodiversity Information Centre M c/o Surrey Wildlife Trust, School Lane, Pirbright, Woking, Surrey. GU24 0JN Tel: 01483 795448 | Fax: 01483 486505 | E-mail: alistair.kirk@surreywt.org.uk

Comment Number 13
From SCC

Statement Traffic and transport - Problem factors

The commentary includes a statement that in Burpham the problem factors are aggravated by "poorly thought out road markings and badly timed pedestrian crossings. The plan supports the retiming of these crossings to reflect the requirements set nationally by the Government". However, all but one of the crossings referred to are toucan crossings which
accommodate pedestrians and mounted cyclists and the crossing timings for these facilities and associated road markings all conform to UK design standards.

**Action:** 20/05/14 This problem has been forward via our country councillor back to the 'roads' as the timings are all set at maximum delays for both Pedestrians and vehicles even while remaining with the envelope of conformity cause serious delays on activation.

**Recommendation:** The current situation is unsustainable as it leaves cars with engines running stationary for longer than is in reality necessary meaning pollution levels are considerable higher than would other be the case. While conforming with current UK design standard does not mean the specific design has been used correctly in the specific location.

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**Comment Number 18**

**From** Thames Water

**Statement** Thames Water are the statutory sewerage undertaker for the whole of the Guildford Borough and the statutory water undertaker for the southern part of the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Development) Regulations 2012. We have the following comments on the Neighbourhood Plan:

**Action:**

**Recommendation:** Noted

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**Comment Number 21**

**From** Thames Water

**Statement** Sustainable Drainage Systems (SUDS)

Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness.

With regard to surface water drainage, we consider that the following paragraph should be included in the Neighbourhood Plan: “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”

**Action:** Amended “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”

**Recommendation:** Noted

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**Comment Number 33**

**From** Burpham Neighbourhood Forum:

**Statement**

Date: 20th December 2013

Business Owners, Retail Owners, Land Owners, Burpham Ward

Dear Sir/madam,

Burpham Neighbourhood Forum Consultation with local business and landowners.

In June 2011 the Burpham Community formed the ‘Burpham Neighbourhood Forum’ under the Localism Act 2011.

Anyone aged 14 and over, currently living or working in the ward of Burpham can contribute to the formation of the ‘Burpham Plan’.

It is an opportunity to establish planning policies for the future development and use of land within the Burpham ward.

The residents of Burpham were consulted in May 2013 and a preliminary plan is in place.
We are now writing to all businesses, retail outlets and landowners to seek your view. The plan is available on http://www.burphamneighbourhoodforum.org. Your views and comments will be added and/or amended into the plan. Can I ask you to seriously consider contributing to the plan, which if passed, will be legally in place for 20 years. All replies to be returned to the above address by ------

Yours sincerely
Secretary,
Burpham Neighbourhood Forum

Action:  No Responses Received
Recommendation:  Noted

Comment Number 35
Title  General
From  Burpham Neighbourhood Forum

Statement
Date: 20th December 2013
Business Owners
Retail Owners
Land Owners
Burpham Ward
Dear Sir/madam,
Burpham Neighbourhood Forum Consultation with local business and landowners. In June 2011 the Burpham Community formed the ‘Burpham Neighbourhood Forum’ under the Localism Act 2011. Anyone aged 14 and over, currently living or working in the ward of Burpham can contribute to the formation of the ‘Burpham Plan’. It is an opportunity to establish planning policies for the future development and use of land within the Burpham ward. The residents of Burpham were consulted in May 2013 and a preliminary plan is in place. We are now writing to all businesses, retail outlets and landowners to seek your view. The plan is available on http://www.burphamneighbourhoodforum.org. Your views and comments will be added and/or amended into the plan. Can I ask you to seriously consider contributing to the plan, which if passed, will be legally in place for 20 years. All replies to be returned to the above address by ------

Yours sincerely
Secretary,
Burpham Neighbourhood Forum

Action:  Sent to all commercial premises and land owners in Burpham
Recommendation:  Noted

Comment Number 39
Title 96   obs B-FD 5b Water supply and sewage infrastructure obs
From  Thames Water

Statement
Policy FD6 - Water Supply and Wastewater/Sewerage Infrastructure
Thames Water support the policy as it is in line with their previous representations.
A key sustainability objective for the preparation of the Neighbourhood/Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states:

“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver......the provision of infrastructure for water supply and wastewater....”

Paragraph 162 of the NPPF relates to infrastructure and states:

“Local planning authorities should works with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment....”

The new web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).

It is therefore important that the Neighbourhood Plan considers the net increase in water and waste water demand to serve proposed developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided. Thames Water therefore support Policy FD6.

Action: Recommendation: Noted - Appendix 8 now reflects concerns

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Comment Number 243
From  Martin Grant

Statement 1.1  This Statement has been prepared by Barton Willmore LLP on behalf of Martin Grant Homes (MGH) who own land at Gosden Hill Farm, to the north east of Guildford, hereinafter referred to as ‘Gosden Hill’. It sets out MGH’s representations to the draft Burpham Neighbourhood Plan (‘the draft NP’) which has been published by the Burpham Neighbourhood Forum (‘the BNF’) for consultation until 14th July 2014.

1.2  Following on from the current consultation, Burpham Neighbourhood Forum intends to submit the draft NP to Guildford Borough Council (‘GBC’) who will undertake further public consultation on the draft NP before appointing an independent examiner to assess its soundness. Subject to the examiner’s findings, and if found sound, it will be taken to a public referendum and made part of the Development Plan for Guildford Borough if it is supported by a majority vote.

Action: Recommendation: 1.1 - Noted

1.2  - The use of the word Soundness refers to the Local Plan NOT Neighbourhood plan with must be 'in General conformity'

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Comment Number 244
Title  Gosden Hill - The majority outside the NP Area
From  Martin Grant

Statement 1.3  Gosden Hill is located outside but immediately adjoining the built-up urban area of Guildford (Burpham), falling wholly within the administrative boundary of GBC. It is bound by the A3 to the north, one of two main arterial routes into and out of Guildford, Merrow Lane to the west and the Guildford-London railway line to the south.

The settlement of West Clandon lies to the east of Gosden Hill, beyond ancient woodland and agricultural land at Desdwell Manor Farm (both of which lie outside the potential developable area). The site presently comprises undulating land including Gosden Hill Farm and a number of residential and farm buildings.
1.4 Due to physical constraints, there is insufficient land available within the Boroughs’ existing urban area to accommodate the objectively assessed needs of the growing population, taking account of economic as well as demographic needs. As confirmed in GBC’s emerging Guildford Borough Local Plan (‘the emerging GBLP’) (published July 2014), GBC considers that this will require the release of Green Belt land for future developments which are capable of making a valuable contribution towards meeting housing needs, whilst also delivering supporting infrastructure, services and facilities, for the new development and benefit of the wider area.

1.5 Whilst currently located within the Green Belt, Gosden Hill has been identified as a strategic urban extension to Guildford within the emerging GBLP in conjunction with its release from the Green Belt.

**Action: Recommendation:**

1.3 - This statement is partially incorrect in that approx one third of the site is adjoining the Built up area and is in effect a duel carriageway width away from it. The remaining is separated from the Urban area by Ancient woodland & common land as of 1st August 2014 is wholly in the green belt only three (3) of the residential properties are in the Burpham Ward Plan area.

1.4 - this is yet to be tested by an inspector.

1.5 - At this stage it is only one of a number of possible sites as the plan is only in draft.

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**Comment Number 249**

**From** GBC

**Statement 1.1** This document is Guildford Borough Council’s response to the draft Burpham Neighbourhood Plan (the plan). These comments are submitted during the consultation required by regulation 14 of the Neighbourhood Planning (General) Regulations 2012.

1.2 There is much to commend the plan. It is clear that a lot of work has been put in and that the intentions are to seek the best outcome for the Burpham community. The plan includes a large number of policies that cover a wide variety of issues, and demonstrates a level of ambition that is admirable. We acknowledge that neighbourhood planning is not an easy activity and that it places significant burdens on the volunteers involved.

1.3 In order to proceed to referendum, and then be made (adopted) by the Council, Neighbourhood plans must to meet the basic conditions set out in the Town and Country Planning Act 1990. Therefore, these comments often focuses on compliance with the basic conditions. However, our comments also cover other aspects of plan making, including soundness and good practice. In some cases we have highlighted significant issues, both in terms of basic conditions compliance and other aspects.

1.4 These comments are made for the purpose of helping the plan, with the aim of enabling it to pass through examination, proceed to referendum and ultimately be made by the Council. We continue to offer our support and advice to help overcome the issues we have identified and will be happy to engage with the neighbourhood forum to this end after the consultation period has ended.

1.5 We would also like to offer an independent health check of the plan prior to submission. This service is provided by the Neighbourhood Planning Independent Examiner Referral Service (NPIERS), a body that supplies examiners for neighbourhood plan examinations. This would enable the plan to be reviewed against the basic conditions by an independent expert.

**Action: Recommendation:**

1.1 - No Comment

1.2 - Noted

1.3 - Noted - we note the comments are above and beyond the statutory requirements

1.4 - Noted we will continue to engage with the council

1.5 - We note the offer of assistance
2.1 The basic conditions that apply to neighbourhood plans and
neighbourhood Orders, set out in paragraph 8(2) of Schedule 4B to the Town and Country
Planning Act 1990, are as follows.

a. To have regard to national policies and advice contained in guidance issued by the
Secretary of State.
b. To have special regard to the desirability of preserving any listed building or its setting
or any features of special architectural or historic interest that it possesses. This applies only to
Orders.
c. To have special regard to the desirability of preserving or enhancing the character or
appearance of any conservation area. This applies only to Orders.
d. To contribute to the achievement of sustainable development.
e. To be in general conformity with the strategic policies contained in the development plan
for the area of the authority (or any part of that area).
f. To not breach, and otherwise be compatible with, EU obligations.
g. To meet prescribed conditions in relation to the Order (or plan) and prescribed matters
have been complied with in connection with the proposal for the order (or neighbourhood
plan).

2.2 Conditions (b) and (c) apply only to neighbourhood development Orders (not
neighbourhood plans) so are not relevant here.

2.3 The only adopted strategic policy currently in force in the existing Local Plan is
policy NRM6 of the South East Plan which deals with development that is likely to have a
significant impact on the Thames Basin Heaths Special Protection Area (SPA). We have
produced a Strategic Environmental Assessment (SEA) screening report which concludes
that policies within the plan will not lead to development that significantly effects our SPAs.
Therefore the plan as a whole meets basic condition (e).

2.4 The EU obligations referred to in condition (f) relate to protecting the environment,
the use of Environmental Impact Assessment (EIA) and conservation of wild habitats, flora
and fauna. The SEA screening shows the plan is unlikely to lead to development that has
significant environmental effects or require an EIA. Therefore the plan as a whole meets
basic condition (f).

2.5 The prescribed conditions in basic condition (g) refer to impacts on European sites
(important habitats), European marine sites, and developments that may require an
Environmental Impact Assessment. We believe the plan as a whole meets basic condition
(g) for the reasons given in 2.4.

2.6 Therefore, the basic conditions that we will consider are as follows.
1. To have regard to national policies and advice contained in guidance issued by the
Secretary of State.
2. To contribute to the achievement of sustainable development.

Action: Recommendation: 2.1 - Noted
2.2 - Noted
2.3 - Noted that NO SEA is required and meets the Basic requirement in 2.1 (E)
2.4 - Noted that the Neighbourhood plan meets EIA & SEA conditions 2.1 (F)
2.5 - Noted that the plan meets 2.1 (G)
2.6 - Noted that the Neighbourhood plan meets basic conditions B,C, E,F,G
Statement 2.7 Regarding basic condition 1, the two main sources of national policy and advice that apply are the National Planning Policy Framework (NPPF) and the National Planning Policy Guidance (NPPG).

2.8 The NPPF states that neighbourhood plans must plan positively to support local development (paragraph 10) and align their ambitions with the strategic needs and priorities of the wider local area (paragraph 184). Paragraph 47 of the NPPF requires local planning authorities to boost significantly the supply of housing, which establishes this as a policy objective. The emerging evidence base identifies a significant strategic need for housing, especially affordable housing. The plan therefore needs to be aligned with the priority of boosting the supply of housing and especially affordable housing.

2.9 The NPPG and NPPF (paragraph 173) state neighbourhood plans need to be deliverable. The NPPF further states that sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. In summary, the plan should not place obligations or burdens that make development unviable or prevent the plan being delivered.

2.10 Regarding basic condition 2, the NPPF (paragraph 7) states that meeting the social dimension of sustainable development means providing the supply of housing required to meet the needs of present and future generations. Therefore, to meet basic conditions 1 and 2 it is clear that neighbourhood plans explicitly should not seek to reduce the potential provision of housing.

2.11 The NPPG states that neighbourhood plans must contribute to improvements in environmental, economic and social conditions or mitigate/offset any potential adverse effects arising from the proposals in the plan. This means that neighbourhood plans must seek positive change and positive development rather than seeking to maintain the status quo.

2.12 The section of the plan entitled ‘History of the plan’ acknowledges that the plan is required to support development. However, taken as a whole, the plan restricts rather than supports development. This does not meet basic conditions 1 or 2.

2.13 We support the use of restrictive policies that prevent inappropriate development in sensitive areas, but we recommend that for the plan to meet the basic conditions and be adopted, this must be balanced by positive policies that enable and encourage development in places and ways that are appropriate.

Action: Recommendation: 2.7 - Noted

2.8 - Para 10 NPPF does not specifically mention Neighbourhood Plans and refers to 'take into account local Circumstances' not as stated 'support local development' - Para 47 is aimed at Local authorities - it is unclear which plan 2.8 refers to (last sentence). The council has already acknowledged our conformity with the Strategic Policy in the current Development plan. We Note that GBC has not Brought Forward a Local Plan since 2003, which continues to contain some relevant policies which together with the NPPF consists of the relevant planning policy context against which the Neighbourhood Plan should be considered.

The Government has confirmed Neighbourhood plans do not need to wait for LPA's to bring forward New Local plans, In relation to the last sentence of para 184. The NP does not Promote less development set out in the current Local Plan - the NP is designed to welcome the application for new housing within the Urban Area subject to the development controls within the plan.

2.9 - We note the interpretation of Para 173

2.10 - Noted the interpretation of Para 7 - it Seeks to promot sustainable development via the planning system in th broader sens and NOT explicitly within any Neighbourhood Plan
2.11 - We Note the interpretation of the NPPG
2.12 - amendment to this section has been made
2.13 - We note the agreement of the use of restrictive policies in ‘inappropriate development and sensitive Areas

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Comment Number 252
From GBC

Statement 2.14 The NPPG states that ‘proportionate, robust evidence should support the choices made and the approach taken’ and ‘sufficient and proportionate evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable solutions’.

2.15 Policies in the plan are generally not accompanied by adequate supporting text that sets out the evidence, and in some cases no evidence or supporting text is presented at all. We suggest that policies need a reasoned justification that clearly sets out the supporting evidence and explains how decisions have been reached. This should include commentary that explains how the policy need has been identified.

2.16 The supporting text could include:

- reference to evidence from community and stakeholder engagement activities: the residents survey, public meetings and workshops, stakeholder engagement activities (including local groups, businesses, service providers, developers etc.), consultations etc.
- National or local policy and guidance
- reference to evidence from external sources
- reference to the evidence collected by the forum and presented in the appendices

2.17 We note that the document includes an exhaustive list of references at Appendix 4 and states that these have been used to inform the plan. In order to clearly demonstrate that policies are underpinned by evidence, we suggest using these sources in the supporting text for the policies, reproducing relevant evidence where appropriate. The text should provide some analysis to show how the evidence has lead to the policy as written. In summary, there needs to be a clearer link between evidence and policy.

2.18 We have concerns over robustness of some of the evidence that has been produced by the forum (see comments against the appendices).

2.19 Neighbourhood planning must be a community driven process so it is particularly important that the supporting text demonstrates that the views of the community have been sought and that these views have been represented in the policy.

2.20 The plan must present adequate and robust evidence in order to demonstrate that basic condition 1 has been met. In the absence of a sustainability appraisal, it is important that the supporting text explains how the most sustainable option has been selected to demonstrate that the plan meets basic condition 2.

Action: Recommendation: 2.14 - The plan is supported with and by Proportionate and robust evidence including Housing; Density, Character, and Age, Community survey, Statutory consultees (twice), Flora and Fauna and Historic. The key consideration is proportionate Neighbourhood Forums do not have the resources of LA's

2.15 - No Specific requirements in legislation to provide supporting text either by length or content, but it is included where it provides addional clarity and not for its own sake. We Note the interim arrangements for saving local plan policies including those saved by GBC do not make provision for the saving of supporting text. Therefore GBC does not have any supporting text at this time.

2.16 - Noted
2.17 Evidence in the plan is in the form of background documentation - plans already passed examination do not have this depth of evidence - Amend text to supporting text to indicated reference Appendix 4
2.18 - Noted
2.19 - Noted: There is no requirement to demonstrate any particular matter within supporting text. The community has been consulted extensively and their views taken into account & evidence of this consultation process will be provided in accordance with Para 15 NPR 2012. It is inappropriate to in our view for extensive detail of the consultation process being in the main body of the Neighbourhood plan
2.20 - It is unclear on what NPPF policy or Legislation this statement is referring to.

Comment Number 253
Title general
From GBC
Statement 2.21 The plan at present feels like an unfinished document that consists mostly of bare policies with some brief supporting notes. Additional work needs to be done to turn the plan into a legible, complete document.
2.22 If adopted, the neighbourhood plan will be a statutory document. It must be written comprehensively and without any errors. The plan currently contains a very large amount of typographical errors. We recommend that this document is fully proof read and amended.
2.23 It would be helpful if the introduction sets out role of the plan and the relationship between the plan and the Local Plan for the benefit of readers that are new to planning.
2.24 The plan lacks a section setting out the vision for the neighbourhood area over the 20 year life of the plan. This could also set out the aims and objectives of the plan. Including a vision will help the public, prospective developers and decision makers by setting out clearly the intent of the plan. It will also set a context to help justify the policies that follow. The vision should most suitably reflect the outcome of community and stakeholder engagement.
2.25 The plan lacks a section explaining how the community and key stakeholders have been engaged to produce the plan. Engagement should an ongoing process throughout the development of a neighbourhood plan. The only evidence presented currently is a single survey of residents. We recommend that the plan clearly sets out the engagement exercises undertaken (e.g. Consultations, publicity events, surveys, questionnaires, workshops, meetings, interviews) and identifies the key stakeholders that were involved in the process. We note that the engagement strategy is summarised very briefly in the History of the Plan section but this does not provide sufficient information or detail.

Action: Recommendation: 2.21 - This is an unspecific comment - a DRAFT document is by its very nature 'unfinished'
2.22 - Noted
2.23 - Noted
2.24 - No requirement for a 'vision' statement
2.25 - This is a requirement of Para 15 of the NPPF not Para 14...

Comment Number 254
From GBC
Statement 2.26 There does not seem to be a logical order to the policies. We recommend grouping policies together under subheadings (e.g. Environment, Infrastructure). This would provide a format that allows for introductory and explanatory text covering groups of policies, rather than requiring a separate introduction for each policy.
2.27 It would be helpful if plan policies are prefixed with a ‘B’ or other appropriate alternative to denote a Burpham Neighbourhood Plan policy (e.g. policy EN1 becomes policy BEN1). This will help planning officers when they write reports outlining policy.
considerations by clearly distinguishing them from Local Plan, national policy and the
policies of other neighbourhood plans.

2.28 The document follows convention by using shaded boxes to separate policy from the
supporting text. This makes it easy for readers to distinguish policy from commentary.
However, in some cases the text inside the shaded box would more suitably sit in the
supporting text (we have highlighted this against specific policies where this is the case). In
many cases, policies lack supporting text altogether, and where supporting text is provided
it is generally not adequate.

2.29 Whilst the style of the document is an issue wholly for the forum, we would suggest
that the clearest layout would be to divide policies into the following sections: introductory
text that sets out the need, the intention, the aims and/or objectives of the policy; the policy
only in the shaded box; a reasoned justification.

2.30 Isolating the policy alone in a shaded box will allow the public, potential developers
and planning officers to clearly see what the policy requirements are. Including an
introduction will make the intent of the policy clear and unambiguous and enable planning
officers (who must apply the policy when making planning decisions) to better understand
what the policy is aiming to achieve and therefore how the policy should be applied.

2.31 The document presents policies in two separate sections; ‘Policies’ and ‘Aspirational
policies’.

It appears that ‘policies’ are land use policies, and aspirational policies are not. If this is the
case this needs to be explained. (The relevance of the two types of policies also needs to be explained for the benefit of the reader.) There also needs to be some discussion of how
aspirational policies will be achieved. We support the inclusion of non-land use policies in
neighbourhood plans and think these policies could usefully follow from or form part of a
vision section. Including a vision could also help provide justification for these policies and
lend them more weight.

2.32 The need for clarity in neighbourhood plans is supported by the NPPG, which states
that the plan should be ‘drafted with sufficient clarity that a decision maker can apply it
consistently and with confidence when determining planning application’. It should be concise, precise
and supported by appropriate evidence.’ At present, the plan does not meet this
requirement and
is therefore not compliant with basic condition 1.

2.33 The NPPG states that ‘Before the formal pre-submission consultation takes place a
qualifying body should be satisfied that it has a complete draft neighbourhood plan or
Order’. We do not believe the document is in a form that meets this requirement, and that
the plan therefore should not progress to the next stage. We recommend that further work
be undertaken on the plan and a further regulation 14 consultation carried out.

Action: Recommendation: 2.26 - The policies are in fact grouped by do not have a
Group Heading this will be corrected in the final document
2.27 - Policy Identification has been amended.
2.28 - Noted - The repetition of this comment re-supporting text and will re-assess
separation of Policy and Text.
2.29 - Noted
2.30 - Noted
2.31 - Noted
2.32 - Noted - The council has chosen not to quote the last sentence of Para 41 MPPG
which states Policies should be distinct and reflect and respond to the unique planning
context of the Specific neighbourhood Area which has been prepared - we therefore disagree
with this statement.
2.33 - We disagree with this assertion. The draft Neighbourhood plan will be amended as set out in this document. The consultation document in accordance with the NPR 2012.

Comment Number 255
From GBC
Statement 3.1 In some places this section of the plan sounds like a personal complaint. This is not appropriate for a statutory document and not relevant for the plan.
3.2 The section makes repeated references to ‘our Greenbelt’. All land designated as Green Belt in our borough and across Surrey is the formally known as the London Metropolitan Greenbelt. Could this phrase be used for clarity?
3.3 The text states that the proposed Aldi development will generate an additional 1,600 cars per day. It is not clear how the 1,600 cars per day figure has been calculated. Consultants working on the planning application calculated that there would be 1,114 movements on weekdays and 1,628 at the weekend. However, this information may not be relevant for the plan.
Action: Recommendation: 3.1 - We TOTALY agree with this statement! It's accuracy is in no doubt - 'History' will be re-written.
3.2 - Noted
3.3 - The numerical accuracy of the NP Draft statement is correct - the Planners Figures do not reflect and do not match their own yearly total of 580,000 visitors a year - devided by 363 shopping days (1589 visits per day) Consultants yearly figure is only 458,952 - approximately a 10% error in the consultants calculations. General retail figures of Car Generation per 100 sqm generates 116 vehicles = 138*116= 1600 vehicles per day. Both calculations tally - the consultants figures do not.

Comment Number 258
Title General comment
From Highways Agency - Anne Nugent
Statement Thank you for consulting the Highways Agency about the pre-submission consultation of the Burpham Neighbourhood plan. I can confirm that we have no objections or other comments on the plan.
Action: Recommendation: Noted

Comment Number 261
Title General Comment
From L Batten
Statement I support the proposals put forward by the Burpham Neighbourhood Plan especially the proposed Clay lane Sly Field Connection
Action: None
Recommendation: Noted - the Link is outside Forum Plan Area.

Comment Number 262
Title General Comment & Parking
From Mr & Mrs Kearney
Statement Comment on the unsuitability of the Clay Lane Slyfield Link Connection. We Support the Burpham Neighbourhood Forum on concerns specifically danger to child pedestrians Blocked from views by Parking in Woodruff Avenue. Children and Disabled people are forced to walk in the road between No1 & No 9.
Action: Recommendation: Clay lane Link is outside the Neighbourhood Plan Area Parking Noted as referenced to relevant policies.
Procedure Comments

Comment Number 117

From Martin Grant

Statement “The ambition of the neighbourhood plan should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them”.

2.3 The Burpham Neighbourhood Plan must be in general conformity with the current Development Plan for Guildford Borough which comprises the saved Guildford Local Plan (adopted January 2003) and which will remain so until such time as it is replaced.

2.4 However, the saved Local Plan is largely out of date, covering the period up until 2006 and predating the publication of the NPPF. Its strategic policies fail to cover or mention the NP period 2014 – 2031 and the adopted Plan cannot demonstrate that the provision for housing growth within it is based upon an up-to-date, objective assessment of housing need, as required by national planning policy (“the NPPF”).

2.5 GBC has recently published the next stage of their draft Local Plan: Strategy and Sites document for consultation until 22nd September 2014 and anticipates its overall adoption by 2015/16. The emerging NP should therefore by guided by the draft Local Plan given it is proposed for adoption during the NP period and represents the Borough’s current direction of travel in terms of shaping the future of Guildford.

2.6 It is insufficient and inappropriate for the draft BNP to rely on being in conformity with the out of date, adopted Local Plan and in general conformity with the broad strategy of the emerging draft Local Plan, given that its fundamental, strategic requirements have yet to be established. Accordingly, MGH concludes that the draft NP is not legally compliant, being premature and having no strategic basis on which to proceed to a referendum until such time as the spatial strategy for the Guildford Borough has been established in the revised Local Plan.

2.7 MGH concludes that the draft NP is unsound, failing to be positively prepared, effective and justified within the context of national planning policy (Para. 182, the NPPF).

Action: Awaiting Court Documents - 4/8/14

Recommendation: 2.1 - Factual

2.2 - Factual

2.3 - Directly contradicts Para 1.8 2.3 is the correct statement

2.4 - We Are Unclear what the reference to 2006 means.

2.5 - The plan has been worded to try and ensure any strategic aspects do not contradict the potential emerging local Plan (currently in Draft) and to future proof the NP

2.6 - This is completely inaccurate - we refer to the Highcourt case of Winslow Neighbourhood plan of July 2014 (R (Gladman Developments Ltd). v. Aylesbury Vale District Council (CO/3104/2014) 22 July 2014).

2.7 - MGH conclusion is both inaccurate and irrelevant as 182 refers to Local Plans not Neighbourhood Plans

Re-use and adaptation of rural buildings in accordance with other policies in this plan.

From GBC

Statement 3.4 The uses for land in the Green Belt suggested by the policy are consistent with national policy and we agree they are suitable uses. However, the wording is
inconsistent with the NPPF (paragraphs 89 and 90) as it excludes certain types of development that are not inappropriate within the Green Belt (e.g. Limited infilling/affordable housing) and includes wording from PPG2 that has now been revoked (‘essential facilities for outdoor sport’ – the NPPF changes this to ‘opportunities for outdoor sport’).

3.5 We support the use of positive wording - ‘Development will be permitted...’ - and agree that this is appropriate wording for policies in a neighbourhood plan. However, Green Belt policy can be considered an exception to this rule as the NPPF at paragraph 89 defines development that should be considered inappropriate in the Green Belt. We think the policy would be clearer if it is phrased in these terms.

3.6 The policy states that ‘Development will be permitted’ for specified uses. It then states ‘New building will be deemed inappropriate’. This could be considered contradictory in certain circumstances. Changing the wording as per the above would resolve this issue.

3.7 The policy states that agriculture and forestry are acceptable purposes for development in the greenbelt. This heading is followed by a colon, and a list of uses in this subsection. However the listed uses do not relate to agriculture and forestry. We believe this may be an error. This policy needs to be rewritten so the acceptable uses are clear, unless it is rewritten as above.

3.8 Neighbourhood plans cannot designate Green Belt boundaries. As written, the policy is attempting to tie the Green Belt boundary to the boundaries in the 2003 Local Plan proposals map. This policy is therefore not compliant with legislation.

Action: Recommendation: 3.4 - Make amendments as recommended
3.5 - Noted action taken
3.6 - Noted policy Amended
3.7 - Punctuation Noted amended
3.8 - The wording was GBC advised

Summary comments
Comment Number 245
Title
From Martin Grant
Statement 1.6 Aligned with the preparation of the GBLP, MGH is seeking the strategic allocation of Gosden Hill for a residential-led, mixed-use development which will deliver a substantial amount of new housing, including affordable housing, as well as new strategic infrastructure and facilities which will benefit its future residents, in addition to nearby parts of Guildford and the Borough as a whole.

1.7 Gosden Hill is expected to deliver the following within the period of the Local Plan (and the Neighbourhood Plan):
   - Residential development (up to 2,000 dwellings).
   - High quality employment space (approx. 2ha) including prime business headquarters and incubator units.
   - A new Local Centre including primary school, GP surgery, village green, café, shops, community rooms and local retail opportunities.
   - A new Park and Ride facility linking with the A3 to the north.
   - A new access to the A3.
   - Highway improvements to existing Burpham off slip so that it is realigned as a two-way access road.
   - Assisting in the delivery of a ‘Merrow’ train station with associated car parking.
   - A proposed Nature Reserve (approx 21ha).
   - New and enhanced local walking and cycle routes.
Managed woodland, open space and the provision of Suitable Alternative Natural Green space (SANG) extending to 38.4 hectares in order to meet the requirements for up to 2,000 dwellings at Gosden Hill.

1.8 MGHs’ representations seek to ensure the Neighbourhood Plan, in meeting national and local guidance, is positively prepared and aligned with GBC’s emerging Local Plan. As this statement concludes, MGH does not, at present, find the emerging NP to be sound and raises a number of principal concerns over its ability to meet the legal requirements. These are explained in the following Section.

Action: Recommendation: 1.6 - There is no detailed planning proposals or application made so no judgement can be made by MGH to assert future Benefits.
1.7 - The 'Aims' of Gosden Hill development cannot be expected as no plan has been submitted.
1.8 - This statement is incorrect. The Neighbourhood plan should support existing policies of the Local Plan 2003. There is no requirement for a NP to be in accordance with documents yet to be published. This point was addressed by Correspondence with the planning minister. This is further enforced by the NPPF guidance which supports the strategic development needs (Para 16) Set out in the local plan and positively to support Local development therefore this paragraph is incorrect.

**Representation**
**Comment Number 246**

*From* Martin Grant

**Statement 3.1** Notwithstanding the fact that MGH finds the preparation of the draft NP to be premature at this stage in time, given the status of the emerging draft Local Plan, MGH is committed to the draft NP process and wishes to make the following representations in order to help secure the soundness of the plan. The following paragraphs therefore set out MGHs’ representations in response to specific draft policies contained within the draft NP.

Action: Recommendation: We Welcome MNH’s Submission but again refer to 1.8 & 2.3 responses and note in all cases 'Soundness' should read 'General conformity with Para 185 of the NPPF

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**Comment Number 247**

**Title** Representations

*From* Martin Grant

**Statement 3.4** Given the draft NP intends to cover a similar plan period to the emerging GBC Local Plan, its draft policies must align with GBC’s direction of travel in terms of the strategy for the Borough, and most importantly, its proposals to facilitate the level of growth required to meet objectively assessed housing needs, in line with national planning policy and the Government’s growth agenda.

Action: Recommendation: 3.4 - See Para 2.3

**Aspirational Policies**
**Comment Number 265**

**Title**

*From* GBC

**Statement 3.90** This section needs an introduction explaining what this section is for and how the policies within are different from the policies in the 'Policies' section.
3.91 The policies in this section appear to be mainly non-land use policies. The examiner of the plan will not consider non-land use policies. The advice given below is for general feedback relating to good practice and does not consider compliance with the basic conditions

**Action:** Recommendation: 3.90 - Noted - to do
3.91 - Noted disagree all other NP’s passed examination with non-land use polices included within the body of the of the Plan

### B-EN 1: Development within the Green Belt

**Comment Number 96**

| Development will be considered inappropriate in the Burpham ward metropolitan Green Belt, as shown on the current GBC local plan map, unless it is for the purposes listed below. New building will be deemed inappropriate.  
| Agriculture and forestry,  
| Opportunities for outdoor sport and outdoor recreation, cemeteries and other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land within it,  
| Limited extension, alteration, or replacement of existing dwellings providing it is in accordance with Policies.  
| Re-use and adaptation of rural buildings in accordance with other policies in this plan. |

**From** Angelina Taylor

**Statement** This policy seems to wholly reasonable sustainable and appropriate for the village

**Action:** Move to supporting Text

**Recommendation:** Noted

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**Comment Number 97**

**From** Sarah Milner

**Statement** I think the Neighbourhood plan is thorough and comprehensive. I would just like to emphasise the areas which are of concern for me and my family (comprising 2 adults and 4 young children).

We bought a house in Burpham in late 2012, and key factors in our choice of location were the 'feel' of Burpham, the proximity to the green belt, and good local primary and secondary schools. We also felt that Guildford was a good-sized town with good commuter links, that accommodates our needs as a family.

I am particularly concerned about the Gosden Hill Farm development, the proposed plans for additional primary and secondary schools in the area and the infrastructure needed to accommodate the increased population and traffic. Any associated changes to the A3 link roads could have a deleterious impact on noise pollution and congestion, depending on how they are developed. Specifically, the Potter's lane interchange is mentioned in the Neighbourhood plan, but I have not seen an outline or the details of how this will work - perhaps this needs further clarification to highlight the implications (benefits and downsides).

I think key drivers which attract people to live in Burpham, (including the fantastic surrounding countryside and villages, balanced with a good, but already congested town centre nearby), run the risk of being ruined by the GBC local plan. Additional neighbouring villages with their own unique 'feel' just become amalgamated with Guildford and its suburbs to become one big sprawling place that loses its identity and appeal. The GBC local plan must prioritise Brownfield sites for development before looking at the Greenfield sites.
With 4 young children in our family, the availability of places in a local schools has been a real challenge for us personally and I have ended up with the 2 children of school age being in separate schools - a logistical headache. We could not get a place in our local Burpham or Merrow schools despite them being our local and closest schools. Therefore, the plan to build additional primary and secondary schools in the locality raises concerns for me in terms of the following: whether there will be enough school places available to accommodate the additional needs of the Gosden Hill farm development; and whether the quality of these schools will be as good as our other options. A key driver for buying our house in Burpham was the outstanding secondary school and good primary/infant local schools. Thus, if a new school/s is built which becomes our closest school it is essential for us that the education our children could receive there is of a similarly high quality as neighbouring schools. For us, that is crucial.

Thank you for the opportunity to comment on the neighbourhood plan and I look forward to getting involved further.

Action: add to supporting comments
Recommendation: Noted

Comment Number 98
From GBC
Statement Please find the SEA screening report attached.
We received a response from Natural England supporting the conclusions in the report. The Environment Agency and English Heritage have not come back. They've had more than a reasonable amount of time so I am assuming they have no comment to make and that there will be no cause to amend the report.

Action: Recommendation: Note No SEA required as advised by GBC NPO

Comment Number 118
From Martin Grant
Statement 3.2 The above draft policy is permissive of development within the Metropolitan Green Belt as shown on the current GBC Local Plan proposals map, providing it is for the following purposes:

• Agriculture and Forestry:
• Essential facilities for outdoor sport and outdoor recreation, cemeteries and other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land within it;
• Limited extension, alteration, or replacement of existing dwellings providing it is in accordance with policies.
• Re-use and adaptation of rural buildings in accordance with other policies in this plan”.

3.3 MGH’s objection to draft Policy EN1 is two fold, finding (i) it superfluous given it duplicates strategic policies set at a Borough-wide level in addition to within the NPPF in relation to Green Belt protection; and (ii) contrary to the Borough’s direction of planning policy travel; the draft GBC Local Plan (July 2014) proposes the release of sites from the Green Belt for urban extensions, which includes Gosden Hill. In this regard, it is contrary to paragraph 184 of the NPPF, failing to align with the prevailing “…strategic needs and priorities of the wider local area”. Paragraph 184 goes on to state that “…neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies”.

3.4 Given the draft NP intends to cover a similar plan period to the emerging GBC Local Plan, its draft policies must align with GBC’s direction of travel in terms of the
strategies for the Borough, and most importantly, its proposals to facilitate the level of
growth required to meet objectively assessed housing needs, in line with national planning
policy and the Government’s growth agenda.

**Action:** Recommendation: 3.2 - Noted

3.3 - This is in accordance with & re-enforces both the 2003 Current local plan and Draft
Local plan. Minor amendments but remaining in the plan has been advised by GBC. The
inclusion of this policy is in respect of community concern in respect of the Greenbelt' NPPF - 184 states Requirement to be in ‘General Conformity’ and the current local plan
allocates land within the ward as Greenbelt, thus justifies the need for such a policy. We
reiterate No legal requirement to meet draft documents noting this policy is not site specific.

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**Comment Number** 156
**From** John Lobley

**Statement** I agree with this policy

**Action:** Recommendation: Noted

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**Comment Number** 191
**From** Worplesdon Parish Council - Gaynor white

**Statement** Worplesdon Parish Council believes that the Greenbelt within the Borough
should remain as Greenbelt and should not be used for the provision of a new housing
estates. Nonetheless, given that Gosden Hill Farm has been put forward within the Draft
Local Plan as a “strategic” site the Parish Council does not believe that the wording of policy
EN1 complies with the emerging Local Plan and as required within the NPPF.

**Action:** Recommendation: Noted

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**Comment Number** 197
**From** GBC

**Statement** 3.4 The uses for land in the Green Belt suggested by the policy are
consistent with national policy and we agree they are suitable uses. However, the wording is
inconsistent with the NPPF (paragraphs 89 and 90) as it excludes certain types of
development that are not inappropriate within the Green Belt (e.g. limited
infilling/affordable housing) and includes wording from
PPG2 that has now been revoked (‘essential facilities for outdoor sport’ – the NPPF changes
this to ‘opportunities for outdoor sport’).

3.5 We support the use of positive wording - ‘Development will be permitted...’ - and
agree that this is appropriate wording for policies in a neighbourhood plan. However, Green
Belt policy can be considered an exception to this rule as the NPPF at paragraph 89 defines
development that should be considered inappropriate in the Green Belt. We think the policy
would be clearer if it is phrased in these terms.

3.6 The policy states that ‘Development will be permitted’ for specified uses. It then
states ‘New building will be deemed inappropriate’. This could be considered contradictory
in certain circumstances. Changing the wording as per the above would resolve this issue.

3.7 The policy states that agriculture and forestry are acceptable purposes for
development in the greenbelt. This heading is followed by a colon, and a list of uses in this
subsection. However the listed uses do not relate to agriculture and forestry. We believe this
may be an error. This policy needs to be rewritten so the acceptable uses are clear, unless it
is rewritten as above.

3.8 Neighbourhood plans cannot designate Green Belt boundaries. As written, the policy
is attempting to tie the Green Belt boundary to the boundaries in the 2003 Local Plan
proposals map. This policy is therefore not compliant with legislation.

**Action:** Recommendation: 3.4 - Make amendment as recommended
3.5 - Noted Action Taken
3.6 - Noted policy amended
3.7 - Punctuation Noted and amended
3.8 - The wording was changed using GBC NPO advice

Comment Number 256

Development will be considered inappropriate in the Burpham ward metropolitan Green Belt, as shown on the current GBC local plan map, unless it is for the purposes listed below. New building will be deemed inappropriate.
Agriculture and forestry,
Opportunities for outdoor sport and outdoor recreation, cemeteries and other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land within it,

Limited extension, alteration, or replacement of existing dwellings providing it is in accordance with Policies.

B-EN 2: Residential Gardens

Comment Number 22

Permission will not be granted for back garden development where:
The site makes an important contribution to the character and appearance of the surrounding area, or
Where the development of the site would adversely affect the amenities of future occupiers or those currently occupying adjoining or nearby properties.

From DR

Statement EN2 – Residential Gardens
The policy speaks of the NPPF but this document may be revised/ altered so it cannot be relied upon as a reference point. The policy needs to specifically state what it is that the NPPF says that is to be incorporated into the policy. It should also be noted that the NPPF is a very strategic level document. Local/Neighbourhood policies need to apply these principles/provisions in detail to meet their local needs

Action: Recommendation: Amend wording to remove NPPF reference.
Permission will not be granted for back garden development where the site makes an important contribution to the character and appearance of the surrounding area, or where the development of the site would adversely affect the amenities of future occupiers or those currently occupying adjoining or nearby properties. [Distances should be in guidance rather than policy as each site will be different].

Comment Number 66
From Liz Hyland
Statement Agree
Action: Recommendation: Noted

Comment Number 68
From Mark Fraser
Statement Investigation into the building of a dwelling in the garden of 7 Meadow Road with access to Marlys Drive has been ongoing for 7 months with Council Planners procrastinating rather than taking action!! There is clearly someone living in the building now. What confidence can we have in effective enforcement of this policy following on from the total ignorance of local will of the Green Man site by Council Planners?!

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Action: passed to GBC
Recommendation: Noted

Comment Number 95
From Angelina Taylor
Statement This policy is sensible and is integral in maintaining the overall ambiance of Burpham.
Action: add to supporting comments
Recommendation: Noted

Comment Number 101
From Patrick Kelly
Statement Does the supporting text form part of the submission. For example Policy EN 2 needs this to qualify the limitation on development.
Contents listing - typos in policy document
Fd 7 to read FD 7
EMP 1 & 2 not included
AT 2 not included
AT3 & 4 to read AT 2 & 3
AC 1 not included
Action: Recommendation: Noted

Comment Number 142
From Andrew White
Statement New development should include sufficient car parking spaces.
Action: Add to supporting comments
Recommendation: Noted- amended to reflect concerns

Comment Number 157
From John Lobley
Statement I agree with this policy and consider it to be sensible and appropriate
Action: Move to supporting comments
Recommendation: Noted

Comment Number 184
From Anthony Teal
Statement I would support this as there have been a number of inappropriate developments squeezed into positions which have detracted significantly from the surrounding area
Action: add to supporting comments
Recommendation: Noted

Comment Number 198
From GBC
Statement EN 2: Residential Gardens
3.9 The policy states:
Permission will not be granted for back garden development where: The site makes an important contribution to the character and appearance of the surrounding area, or Where [sic] the development of the site would adversely affect the amenities of future occupiers, or those currently occupying adjoining or nearby properties.
Note 1: where 'adversely' means in this case, any development which exceeds 50% of an existing garden, where the original house floor plan including garages and out buildings is left exceeding 33% of the remaining plot size. Any new development (structure) in this new plot must not cover an area greater than 33% of the total new plot size and must be situated [external wall to external wall] equidistant from all surrounding properties.

3.10 The main thrust of this policy appears sound. However, the supporting text that defines 'adversely' is too prescriptive where it sets a limit on plot coverage and refers to siting of buildings.

3.11 It is not clear how the definition of ‘adversely’ has been arrived at. An explanation of why these particular ratios of dwelling to garden size have been chosen is needed to provide a justification for the policy. We would expect such a prescriptive policy to be accompanied by robust evidence and justification. However, it is likely that such a requirement would not be acceptable.

3.12 The policy relies on a presumption against back garden development. However, back garden development is not defined. For example, does this apply to new dwellings only, or also extensions to dwellings? It would be useful to make this explicit.

3.13 It doesn’t seem possible for a development to adversely affect the amenities of people who don’t yet live there. Can this be worded a different way?

3.14 The supporting text refers to the Character Descriptions of Burpham document in Appendix 2, which forms part of the evidence base. Appendix 2 demonstrates that density is not uniform across the neighbourhood area. In the north west corner of the neighbourhood area, many existing dwellings already exceed the 33/66 per cent ratio. Applying this rule in those areas would result in a change to the existing character. Therefore, as a blanket policy it does not meet the aim of maintaining character (the main aim of the policy is not stated, but we assume that this is the aim – this needs to be stated for clarity).

3.15 The requirement for new dwellings to be equidistant from all surrounding properties is also overly prescriptive. Additionally, as written, it could result in a building being placed in the middle of a plot. If such a requirement is to be included, we suggest it is rewritten to make the desired outcome clearer.

**Action:** Recommendation: 3.9 - Noted
3.10 - This policy is designed to maintain the special nature and characteristic of the plan area. Change wording from Adversely to unacceptably detrimental
3.11 - Noted see 3.10 above
3.12 - Noted and policy amended
3.13 - Removed word Future
3.14 - We are not setting density
3.15 - This is a misreading of the policy it clearly states from wall to wall not plot to plot

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**B-EN 3: Public Open Space**

**Comment Number 23**

**Title 5**

The following public open spaces will be protected and their enhancement supported by designation as Local Green Space. See Local Green Space Zones appendix 3

Sutherland Memorial Park:
As the park is a designated War Memorial it is an important open space for Burpham and the wider area and will be protected. A requirement for undercover recreational / community facilities has been highlighted and the plan supports proportionate and reasonable increase in the covered area for the Sutherland Memorial Park & Hall and village hall area of the Ward. At Sutherland Memorial Park permission will be granted for a covered recreational facility that complements the existing character and use of the park within the footprint of the current buildings.
Riverside Nature Reserve:
This green flag nature reserve lays part in and part out of the ward. This plan supports its maintenance and continued designation as a nature reserve with special status as a Site of Nature Conservation Importance/Interest (SNCI) forming part of the Local Nature reserve in the Metropolitan Green belt. This site is an essential part of the Flood plain of the Wey Valley north of the town centre of Guildford. There has been a record of significant flooding to a depth of 1 meter during Winter 2013/14 in the reserve and supports its wetlands designation.

Merrow Common:
This area of woodland, straddling New Inn Lane and Merrow Lane, is identified in early maps and in the Doomsday Book as 'Swine feed'. The woodland contains many old trees and forms a unique barrier between the green belt and the urban area, any attempt to modify this area in any way is strongly opposed by this plan. A Tree Preservation Order exists on all trees within the Area South west of Merrow Lane to the railway line as does an Ancient Woodland Order cover some sections of this ‘continuous’ woodland.

Merrow Common Local Green Space See Policy EN6
This area is designated 'Local Green Space' as specified in the NPPF clause. 76 -78. This policy enshrines the area identified in the adjoining map as Local Green space in perpetuity.

Green spaces as identified on the plan and within appendix 2 will be designated and preserved as "Local Green Space" for the community for their amenity and character value in accordance with NPPF clause 76-78

From DR
Statement EN4: Public Open Space
The policy deals specifically with three areas of public open space.
Sutherland Memorial Park: Policy appears to be stating that no development will be acceptable but at the same time states that additional covered development (for the community) is required which is contradictory.
Riverside Nature Reserve: The policy supports its designation and continued maintenance. This in its current form is not a land use planning policy as such. It is not clear what status the designation as a nature reserve has (if of national importance this is handled by Natural England)
Merrow Common: The policy seeks to protect the land.

Action: Recommendation: The following public open spaces will be protected and enhanced. At Sutherland Memorial Park permission will be granted for a covered recreational facility that complements the existing character and use of the park.

Comment Number 64
Title 5  B-EN 3: Public Open Space
The following public open spaces will be protected and their enhancement supported by designation as Local Green Space. See Local Green Space Zones appendix 3
Sutherland Memorial Park:
As the park is a designated War Memorial it is an important open space for Burpham and the wider area and will be protected. A requirement for undercover recreational / community facilities has been highlighted and the plan supports proportionate and reasonable increase in the covered area for the Sutherland Memorial Park & Hall and village hall area of the Ward. At Sutherland Memorial Park permission will be granted for a covered recreational facility that complements the existing character and use of the park within the footprint of the current buildings.
Riverside Nature Reserve:
This green flag nature reserve lays part in and part out of the ward. This plan supports its maintenance and continued designation as a nature reserve with special status as a Site of Nature Conservation Importance/Interest (SNCI) forming part of the Local Nature reserve in the Metropolitan Green belt. This site is an essential part of the Flood plain of the Wey Valley north of the town centre of Guildford. There has been a record of significant flooding to a depth of 1 meter during Winter 2013/14 in the reserve and supports its wetlands designation.

Merrow Common:
This area of woodland, straddling New Inn Lane and Merrow Lane, is identified in early maps and in the Doomsday Book as ‘Swine feed’. The woodland contains many old trees and forms a unique barrier between the green belt and the urban area, any attempt to modify this area in any way is strongly opposed by this plan. A Tree Preservation Order exists on all trees within the Area South west of Merrow Lane to the railway line as does an Ancient Woodland Order cover some sections of this ‘continuous’ woodland.

Merrow Common Local Green Space See Policy EN6
This area is designated 'Local Green Space' as specified in the NPPF clause. 76 -78. This policy enshrines the area identified in the adjoining map as Local Green space in perpetuity. Green spaces as identified on the plan and within appendix 2 will be designated and preserved as "Local Green Space" for the community for their amenity and character value in accordance with NPPF clause 76-78

From Liz Hyland
Statement: Agree
Action: Recommendation: Noted

Comment Number 94
From Angelina Taylor
Statement: The preservation and protection of the village green spaces is essential in maintaining the ambiance of the village. Its the very reason people will choose to live in Burpham and Guildford and in tune with the government current thoughts on building sustainable garden cities;
Action: move to Supporting comments
Recommendation: Noted

Comment Number 119
Title 5 B-EN 3: Public Open Space
From Martin Grant
Statement: Draft Policy EN3: Public Open Space and Policy EN4: Local Green Space
3.5 The above draft policies are interlinked; draft Policy EN3 seeks to designate areas of public open space within Burpham as Local Green Spaces while draft Policy EN4 seeks to protect such designations from development.
3.6 Draft policy EN3, in its current form, is misleading, prescribing only three proposed Local Green Spaces before referring to an Appendix (no. 3) for the full listing of proposed Local Green Spaces within Burpham.
3.7 Merrow Common forms one of the three proposed Local Green Spaces included within the draft Policy EN3 wording which it describes as follows:
“This area of woodland, straddling New Inn Lane and Merrow Lane, is identified in early maps and in the Doomsday Book as ‘Swine feed’. The woodland contains many old trees and forms a unique barrier between the Green Belt and the urban area, any attempt to modify this area in any way is strongly opposed by this Plan. A Tree Preservation Order exists on all trees within the area south west of Merrow Lane to the railway
line and an Ancient Woodland Order covers some sections of this ‘continuous’ woodland”.

**Action: Recommendation:** 3.5 - Noted
3.6 - Sutherland Memorial Park, Merrow Common & Riverside are the major sites and clearly cross refers to the other sites in Appendix 3
3.7 - No Comment

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**Comment Number** 199

**From** GBC

**Statement** 3.16 OS identify the triangle area of woodland between New Inn Lane, the train tracks and the edge of the urban area as Copse Edge. Should this name be included for clarity?

3.17 The policy states that ‘any attempt to modify this area in any way is strongly opposed by this Plan’. We suggest this could be reworded to allow for beneficial activities like conservation measures or habitat management. The NPPF (paragraph 7) states that improving biodiversity is a factor in achieving sustainable development. Preventing management that would enable this is therefore not compliant with basic condition 1.

3.18 The policy makes reference to ‘Ancient Woodland Orders’. Ancient woodland is not designated through orders. The text should refer to an ‘ancient woodland designation’.

**Action: Recommendation:** 3.16 - Ok Amend
3.17 - Noted Policy amended
3.18 - amended

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**B-EN 5: Historic Environment**

**Comment Number** 12

The plan shall protect the visual and heritage amenities of the historic views and historic setting, as described in the character assessment appendix of this plan. Permission will be granted for development that conserves and enhances the following listed buildings, historic places and their settings (noting this is not an all-inclusive list): See appendix 5

- Sutherland Memorial Park.
- Pimms Row cottages and area.
- New Inn Farm House and Lilac Cottage.
- Bowers lock.
- Royal Mail pillar box in Kingpost parade - Edward VIII locally listed.

Planning proposals shall be expected to have due regard to the character assessment allocated to the individual locations. The effect of a planning application on a non-designated heritage asset should be taken into account when determining the application.

**From** SCC

**Statement** Policy EN5 – Historic environment

The policy as it is currently worded appears only to protect views rather than the physical heritage itself. If the intention is to protect the physical heritage, then the policy needs to refer to enhancing heritage and promoting better heritage asset management.

We would recommend contacting the Historic Environment Record (HER) to get an appraisal of all the heritage assets within the plan area for more information. There is one designated Area of High Archaeological Potential within the plan area that should be considered and a Roman road projected (but not confirmed) to run through the area, but archaeology is absent from the plan entirely, as are locally-listed buildings and heritage landscapes.
We would also recommend that a heritage character appraisal of the plan area be undertaken. Such an appraisal need not be extensive, but would allow for the plan to holistically catalogue the important historic environment features of the area, and for a policy to be developed that best serves their understanding, enhancement and ultimately their protection. English Heritage have produced a short booklet for neighbourhood planning and heritage purposes called "Knowing Your Place" (available on the English Heritage website) which sets out how to assess your local area from the historic environment perspective and might be helpful.

Furthermore, the HER and the county council’s Heritage Conservation Team planning and heritage advisory services are open and free to use for neighbourhood planning purposes and the Forum is invited to take advantage of this facility to discuss these concerns/recommendations. Please contact Tony Howe in the Heritage Conservation Team on 01483 518783.

**Action:** 20/05/14 Added reference to Site 18 of the Local Green Space designation

**Recommendation:** This is in line with policy 12 of the emerging local plan and Appendix 9 refers.

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**Comment Number 24**

**From** DR

**Statement** EN5: Historic Environment – natural features

The policy is vague and deals with two separate issues namely the historic environment and "natural features".

The historic environment is made up of many things such as listed buildings, conservations areas, ancient scheduled monuments et al all of which have different statutory tests applied to them. It should be noted that these protections are part of the NPPF and will be applied. At present the policy wording is not consistent with the NPPF and does not define/distinguish between different heritage assets.

It is accepted that the plan can support future designations of Ancient Woodland but the policy itself cannot make this designation or even compel the designation to be made. The policy also talks of protecting certain views but does not specify where the views are from. This may be outside the powers of a Neighbourhood Plan and will need looking at again potentially taking additional advice.

**Action:** **Recommendation:** [Setting of Listed Building covered by Policy HE4 of GLP. Suggested policy:]

Permission will be granted for development that conserves and enhances the following Listed Buildings and their settings:

[list of buildings]

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**Comment Number 37**

**From** SCC - Heritage Conservation Team

**Statement** Please find attached the Historic Environment Record data for the Burpham area. As I explained when we spoke just now the data is unfiltered, so there is no interpretative material included. If you require additional information about any of the entries the easiest thing to do will be to give me a call to discuss. You might also be interested in the English Heritage document "Knowing your Place" (if you haven't seen it already) which has some information regarding neighbourhood planning and the historic environment, and how the HER data can be used. I have attached a link to the EH website for their neighbourhood planning pages which include a download copy of this document below. I hope you find this useful.
I hope this suffices for your purposes, but please feel free to contact me if you have any queries. As promised, a hard copy of this information will also be sent in the post this evening.

**Action:** Recommendation: Noted

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**Comment Number 62**
**From** Liz Hyland

**Statement** Whilst I agree the character of historic buildings should be preserved I think modern buildings that compliment the existing buildings should be allowed although the decision of whether they are complimentary or not is very open to personal taste.

**Action:** Recommendation: Noted

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**Comment Number 92**
**From** Angelina Taylor

**Statement** I agree with this absolutely these historic landmarks form the very character of the village that makes the village an interesting and desirable place to live. They raise awareness in the young of local history, fostering an interest in their immediate environment.

**Action:** Recommendation: Noted

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**Comment Number 121**
**From** Martin Grant

**Statement** Draft Policy EN5: Historic Environment
3.15 Draft policy EN5 seeks to “…protect the visual and heritage amenities of the historic views and historic setting” of heritage assets identified within both the Policy (although not exclusively) and at Appendix 9. MGH queries the necessity for this policy, bearing in mind that it replicates NPPF and Local Plan policy. In any event, there are no historic views from Sutton Place or Clandon Park toward Gosden Hill and on this basis, MGH does not consider that their future proposals will have any detrimental impact in respect of this draft policy.

**Action:** Recommendation: 3.15 - Noted - But Incorrect historic view of farmland from Sutton Place front gate.

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**Comment Number 159**
**From** John Lobley

**Statement** I agree with this policy and consider it essential that this historic environment is preserved

**Action:** Recommendation: Noted

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**Comment Number 201**
**From** GBC

**Statement** 3.22 The policy makes reference to a register of heritage assets at appendix 9. It is not clear in the text where this register has come from. If this data has been borrowed from another source, this must be referenced. If it has been produced locally, the process for this should be explained (e.g. Assets nominated through the neighbourhood survey etc.).

3.23 The register of assets is difficult to follow. Some explanation of the data would be useful, or links to where the register can be found if it is an online resource.

**Action:** Recommendation: 3.22 - The data is From SCC Historic Noted add Sources 3.23 - Noted

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**Comment Number 225**
**From** GBC
**Statement** Neighbourhood Plan Appendix 2: Character Descriptions of Burpham

4.4 Appendix 2 of the plan is a character assessment of the urban area and underpins policies regarding density and design. We support the use of this evidence to underpin neighbourhood plan policies and believe that it is a key piece of evidence supporting the plan as a whole. However, the character assessment needs to be more analytical and minimise the purely subjective opinions.

4.5 In character assessments generally, superlatives and pejoratives are inappropriate. Any comments either negative or positive should be factual and explained in terms of cause and effect on the environment and users. For example, on page 3: “In our Local Green Spaces document we are protecting ‘the trees the other side of the road’ [sic] as it, too, is now in danger of being overrun by development of some 2000 houses at Gosden Hill Farm.” We suggest rewriting this to something like; ‘the Local Green Spaces document aims to protect trees on both sides of the road in order to preserve the visual and wildlife amenity of these tree belts and the positive benefits trees provide to health, in view of possible expansion of Burpham in the area of Gosden Hill Farm’.

4.6 The character assessment needs to be done in such a way that does not cause offence, and in a balanced way that shows both the positive and negative aspects of each area under analysis. The section on Raynham Close (page 11) as written does not sound like an analytical appraisal of its merits.

4.7 The text states that Raynham Close ‘is now being used as precedence of acceptable density by appeal inspectors.’ This information is not relevant for a character appraisal. If this information is relevant to another part of the document, it needs to be evidenced somewhere (perhaps an appendix).

4.8 Data is needed to prove assertions, otherwise they are only pejoratives. For example, on page 11: ‘Originally St Mary’s church and back garden this site was designated for high density housing during 2004. This has blighted this area of Burpham with flooding and foul water drainage problems.’

4.9 In the Local Green Spaces section (pages 13 to 15), some of the titles may be better written as a description of the land type rather than a perceived use, as green spaces may in fact have multiple uses. For example:

- Common land / Ancient Woodland / SNCI – consider a generic term e.g. ‘Listed and protected green space’
- Regulated recreation – consider a more commonly used term e.g. ‘Playing fields and recreational green space’. The draft Local Plan uses the term ‘formal parks and gardens’. Would either of these be suitable?
- ‘Unregulated Recreational’ may be important for wildlife habitat as well as for recreation – consider ‘Natural green space’ (as used by Natural England)
- Stress relief zones – consider ‘Small urban green space’

4.10 It would be useful to have an overview map that shows which character description applies in which of the proposed spaces.

4.11 The density calculations have been done as a black box exercise (accompanying note notwithstanding). For robustness, it would be good practice to explain the methodology used and include the workings out to explain how these density figures have been achieved. 4.12 Page 10 (1970 to 1990) refers to the housing as ‘high density’. While there is no universally agreed definition of the term, and it is not clear which streets are being referred to, the pictures depict what appear to be semi-detached homes. It is difficult to refer to such dwellings as ‘high density’.
4.13 A density overview map would be useful to make it clear which areas fall under each section.

**Action:** Recommendation: 4.4 - Noted
4.5 - Noted - amended to match Words
4.6 - Remove Poorly designed - Survey 102 E& Comment page 17
4.7 - amend as Suggested
4.8 - Noted - Referenced Council meetings Early 2014 with Burpham Residents ongoing
4.9 - Noted - amended
4.10 - Noted
4.12 - Noted - Changed to Higher density than previous developments
4.13 - Noted

**B-EN 4: Local Green Space: New Wild Life Corridor Merrow Common & Lane**

**Comment Number 3**

**Title 38**

This policy will enable an important Green Space in Burpham to be protected in accordance with the Paragraph 77 of the NPPF - The 'new' area designated is from The junction of London Road and Merrow Lane 100 metres at right angles to the center line of the road towards the North East, then along Merrow Lane until it reaches Merrow Common stream. Then, to form a rough triangle, with its west boundary being the development line to the rear of Gosden Hill Road in the east. Then, following the tree line of Merrow Common until it reaches the railway line in the south. Then, along the railway line to the west, where it joins the development line arriving from the north which includes the areas of the Tree Protection Order of 1949 and the Ancient Woodland designations of the 1980’s and the area known as "Copse Edge". It includes the wooded areas on both sides of Merrow Lane and New Inn Lane.

Development will not be permitted within this area except that which provides drainage or minor improvement to the pre-existing facilities, such as storm drains and future flood alleviation ponds.

*From Natural England*

**Statement** In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out) (see Schedule 2, The Neighbourhood Planning (General) Regulations 2012). Therefore measures may need to be incorporated into the Neighbourhood Plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the possible effects of the Plan on European protected sites. This will be particularly important if a Neighbourhood Plan is to progress before a Local Plan has been adopted.

**Action:** 20/05/14 SEA organised via GBC - Dan Knowles

**Recommendation:** This policy is in line with Policy 14 & 19 of the emerging local plan

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**Comment Number 4**

*From Natural England*

**Statement** Natural England would also like to see reference to the Thames Basin Heaths Special Protection Area Avoidance Strategy 2009-2014 in the plan:

Action: Recommendation: Noted

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Comment Number 5
From Natural England
Statement Strategic Environmental Assessment
Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004. Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance at:
Action: Recommendation: Noted

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Comment Number 6
From Natural England
Statement Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans and development proposals. This is available at: http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf
Action: Recommendation: Noted

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Comment Number 8
From Natural England
Statement Protected landscapes
Natural England note that the plan area is close to the Surrey Hills Area of Outstanding Natural Beauty (AONB), we advise that you take account of the Surrey Hills AONB Management Plan for the area seek the views of the AONB Partnership.
Action: Recommendation: Noted

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Comment Number 9
From Natural England
Statement Protected species
You should consider whether your plan has any impacts on protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England. Natural England Standing Advice
Action: Recommendation: Noted

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Comment Number 10
From Natural England
Statement Opportunities for enhancing the natural environment Neighbourhood plans and proposals may provide opportunities to enhance the
Character and local distinctiveness of the surrounding natural and built environment, use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature.

**Action:** Generate Local Green space document Appendix 3 to Neighbourhood plan

**Recommendation:** Noted

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**Comment Number 11**  
**From** Natural England  
**Statement** Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal.

**Action:** Recommendation: Noted

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**Comment Number 34**  
**From** Woodland Trust  
**Statement** Your plan looks great so far – just a couple of comments:  
Policy EN6 – it may be worth thinking about any notable individual trees that should be protected within your plan. The Ancient Tree Hunt is a useful resource:  
http://www.ancient-tree-hunt.org.uk/  
Policy C1 – It would be good to think about green spaces as community facilities, there are two useful access standards you can use to judge whether your community has enough green space:  
Natural England and the Countryside Council for Wales Accessible Natural Green space Standard (ANGSt):  
No person should live more than 300m from their nearest area of natural green space of at least 2ha in size at least one accessible 20ha site within 2km of home one accessible 100ha site within 5km of home one accessible 500ha site within 10km of home provision of at least 1ha of Local Nature Reserve per 1,000 people  
The Woodland Trust (endorsed by the Forestry Commission) has the following access standard: That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes  
These are also useful for judging green space provision within new housing development plans.  
Something else to think about is planting new trees, you may have some great old trees now but have you considered succession planting for when these trees reach the end of their life and have to be felled? Also how will you ensure new developments are attractive and green? You could specify a certain number of street trees per new home/ a certain number for each supermarket car parking space. These are just thoughts and I appreciate each point may not be useful in meeting the specific aims of your plan but hopefully you may be able to take on elements of these.

**Action:** Sections included in various policies

**Recommendation:** Noted

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**Comment Number 38**  
**From** CPRE -Tim Harold  
**Statement** Thank you for keeping me well informed about your pre-submission consultation.
As you know, I am not a resident of Burpham but live in Holy Trinity Ward. However, as I have had a home in Guildford for 20 years, I am naturally concerned about the future of your community which I of course know well, and the likelihood of the new development proposals being implemented that are now being discussed. I am particularly interested in plans for the road and traffic infrastructure associated with the green approaches down the A3, and the link roads in the vicinity of Burpham, that lead to Guildford and elsewhere. I have, therefore, also attended some of the meetings concerned with plans for the SARP which are outlined in the draft Local Plan consultation that began at the start of July.

As Chairman of CPRE Guildford District, I shall of course be submitting a response to the draft Local Plan consultation which started at the beginning of July. This will include our views on any further encroachment into the countryside and our objection to proposals for altering the Green Belt boundary. We are also very concerned about the River Wey and the Riverside Park which we believe should be protected and enhanced. We assume that you have discussed this with the National Trust. We have noted your green space suggestions and natural environmental corridor ideas which should be carefully assessed, and certainly not interfered with prematurely. We presume that you are already in contact with the Environmental Agency and the Surrey Wildlife Trust who support the Wey Landscape Partnership and will need to be concerned with such matters as flooding, water cleanliness and sanitation.

We will want to comment on any road proposals involving Clay Lane when they are submitted for consultation. Presumably, the Highways Agency will be required to approve any suggestions that involve the A3. We still maintain that priority should be given to improving the A320 for HGV traffic.

**Action:** Recommendation: Noted

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**Comment Number 63**
*From  Liz Hyland*
**Statement** Agree

**Action:** Recommendation: Noted

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**Comment Number 65**
*From  Liz Hyland*
**Statement** I strongly agree that green spaces in existing estates should remain and not be built on - reference local Green spaces map.

**Action:** Recommendation: Noted

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**Comment Number 67**
*From  Liz Hyland*
**Statement** Agree that wherever possible the openness of the greenbelt should be maintained.

**Action:** Recommendation: Noted

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**Comment Number 93**
*From  Angelina Taylor*
**Statement** The preservation of areas for wildlife is essential for the environment. We should be encouraging the wildlife to do otherwise will be to our detriment for example the current lack of bees in the country.

**Action:** Move to supporting Comments
**Recommendation:** Noted
Comment Number 102
From Pamela Chubb
Statement Attached are the spreadsheets for the monads (1km squares) that I have completed so far for TQ0251 and TQ0252. I have added English names in column N.
Action: Recommendation: Inserted into Appendix 3 Local Green spaces

Comment Number 104
From Communities - Mick Duggan
Statement There is nothing in legislation to prevent you from proposing designation of a Local Green Space through a neighbourhood plan for an area of land that is currently in Green Belt.
However, it is important to bear in mind that neighbourhood plans need to meet the basic conditions set out in legislation. One of these basic conditions concerns having regard to national policy and advice. In this matter, paragraphs 76 – 78 of the National Planning Policy Framework, which I am sure you are aware of, will be relevant. I would not wish to pre-empt what conclusions the eventual independent examiner of your draft neighbourhood plan might come to.
The Government’s planning guidance at also addresses the link between Local Green Space and Green Belt.
What if land is already protected by Green Belt or as Metropolitan Open Land (in London)? If land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.
One potential benefit in areas where protection from development is the norm (e.g. Villages included in the green belt) but where there could be exceptions is that the Local Green Space designation could help to identify areas that are of particular importance to the local community.
Another option might be to encourage your local planning authority to make the Local Green Space designation if and when it decides to remove the land in question from the Green Belt.
I should add that DCLG cannot give legal or professional advice. Please treat the above as informal steers as you make your way through development of your neighbourhood plan. I hope they prove useful. Please feel free to share them with your local planning authority. I would be happy to talk to them also about this issue.
Action: Recommendation: Noted

Comment Number 115
From Natural England - Piotr Behnke
Statement Burpham Neighbourhood Plan - Regulation 14 stage:
Having looked through the information which has been made available for this stage of consultation on the Burpham Neighbourhood Plan it is clear that broadly speaking there aren’t any issues which Natural England would wish to make comments on.
The “Reference Documents” list shown in Appendix 1 would do well to include a reference to Guildford’s “Thames Basin Heaths (TBH) Special Protection Area (SPA) Avoidance Strategy 2009-2014” which can be found on their website at the following link - TBH SPA. Although in its current form this strategy is at the end of its planned period Guildford will be updating it
this year and it does contain very relevant policies relating to the SPA and how Guildford has worked up the Avoidance Strategy.

Natural England would also draw your attention to the fact that the Burpham Neighbourhood Plan area does fall within the TBH zone and as such should be recognised within the plan even if no actual site allocations are being made, being just 1.6km from Whitmoor Common which is designated as Site of Special Scientific Interest (SSSI) and forms part of the Thames Basin Heaths Special Protection Area (SPA).

Action: Recommendation: Noted - amended

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Comment Number 120
From Martin Grant

Statement 3.8 Policy EN4 further states that “...green spaces as identified on the plan and within Appendix 3 will be designated and preserved as “Local Green Space” for the community for their amenity and character value in accordance with NPPF clauses 76-78”. It adds that “...development will not be permitted within Local Green Spaces except where it provides drainage or minor improvement to the pre-existing facilities such as storm drains and future flood alleviation ponds”.

3.9 MGH objects to the wording of draft policies EN3 and EN4 in their current form. Neither policies are positively worded and have the potential to act as barriers to development, being contrary to the overarching aims and objectives of the NPPF and national growth agenda. This is particularly pertinent for Policy EN3 where it states, in relation to the proposed Local Green Space at Merrow Common, that “...any attempt to modify this area in any way is strongly opposed by this plan”.

3.10 The NPPF requires Local Planning Authorities to prepare and implement legally sound and compliant Local Plans which are “positively prepared” and requires Neighbourhood Plans to “positively support” these (paragraphs 182 and 184 respectively, the NPPF). The Policy wording within both EN3 and EN4 is in direct contradiction to this, being wholly restrictive of any development in designated Local Green Spaces except, where it provides drainage alleviation.

3.11 Merrow Common is afforded a protection from development by virtue of its common land status. MGH recognises its importance in terms of local and open green space within the Burpham community. The emerging proposals for Gosden Hill seek to retain this land as open green space and enhance the connectivity between both the common land and wider open green space, including the SANG to be made publicly accessible at Gosden Hill.

3.12 The Local Green Spaces identified within the draft NP at Site nos. 1, 2 and 3 all fall within the extent of Gosden Hill and whilst MGH supports the retention of important vegetation along this corridor, it is considered that the draft NP overestimates the extent of these spaces and their importance. Also, the draft NP lacks sufficient evidence and justification for their designation, when having regard to the NPPF criteria set out at paragraph 77 which requires Local Green Spaces to:

• Be reasonably close to the community which it serves;
• Be demonstrably special to a local community, holding a particularly local significance; and
• Be local in character and not an extensive tract of land.

3.13 It should be borne in mind that whilst there are larger trees of moderate/high value along this corridor (covered by Sites 1, 2 and 3), they are limited in places, with some boundaries consisting of lower value hedgerows, in particular to the north-west (Site 1) where part of the boundary is actually Lawson’s Cypress. Vegetation is not continuous and is not as wide as the proposed Local Green Space designations suggest; most of the areas identified consist at least, in part, of arable land in private ownership. Any development at
Gosden Hill will support the retention of important and higher value vegetation, enhancing the corridor for landscape and ecological benefit, whilst helping to define new development from old as well as providing additional visual enclosure for local residents.  

3.14 MGH objects to draft Policy EN4 in its current form and recommends that the draft NP provides continuity between draft Policy EN4 and draft Policy AC1 (Access to Leisure Facilities), particularly where the latter is promoting enhanced access to Merrow Common. On this basis, it is recommended that Policy EN4 is reworded to allow accessibility measures, in line with Policy AC1, to be undertaken.

**Action:** Recommendation: 3.8 - Repetition of Policy

3.9 - Positive Wording will be applied - Note: Local Green space is the way to provide 'Special protection against development' Para 005 NPPF Planning Practice Guidance.

3.10 - Refer to Para 005 NPPF Planning Practice Guidance. Note Para 182 does not apply to Neighbourhood Plans

3.11 - We welcome support of protection of GBC owned Common Land Note: This contradicts Para 1.3 'abutting urban area' statement.

3.12 - We welcome MGH support of their recognition of this important corridor which Links Merrow Common (site 2) with the Wild life Corridors along side the A3 as agreed by the Highways Agency.

**Bullet 1** - These sites are part of a local Circular Walk and site 2 & 3 provide the Green Cathedral edging in part the 2003 Greenbelt line and provides one of the only Quiet and remote spots within the Neighbourhood plan area. These sites are also adjacent to an Ancient roadway which helps Naturally frame the Burpham Ward.

3.13 - The assessment of Vegetation is very subjective and the plan acknowledges the type of vegetation is not continuous, hence its division into 3 parts. We Welcome the support the whole hearted support for these areas and see no valid reason considering MGH’s other statements of provision of enhancement to this corridor and can see no valid reason why 'Local Green space site 1' should not be upgraded to match sites 2 & 3 as proposed to provide additional visual enclosure for existing local residents.

3.14 - The objection has been noted and the policy amended to cross refer to Policy AC1 & the commons act 2006 - the importance of these green spaces are set out in Appendix 3

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**Comment Number 140**
**From** Andrew White
**Statement** [added in error]

**Action:** Recommendation:

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**Comment Number 141**
**From** Andrew White
**Statement** I agree with this policy.

**Action:** Recommendation: Noted

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**Comment Number 143**
**From** Andrew White
**Statement** All the spaces identified are important to the enjoyment of those living in Burpham and as wildlife areas.

**Action:** Move to supporting Comments

**Recommendation:** Noted

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**Comment Number 150**
**From** Susan Wong
**Statement**
Green spaces are important to our well being and it is important that we preserve them. I regularly walk through the woody area next to Sainsbury's in Burpham. Often I am with my young grandsons and we look out for the wildlife. I have seen stag beetles there. My grandsons enjoy the small playground in Devoil Close. Sutherland Memorial Park offers many play facilities for people of all ages. My grandsons enjoy running over the playing field to their pre-school and visiting the playground. In the future they will be able to participate in other sports there. I enjoy the open space.

**Action:** None

**Recommendation:** Noted

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**Comment Number 158**
**From** John Lobley

**Statement**
I agree with this policy and consider it essential that these spaces are protected.

**Action:** None

**Recommendation:** Noted

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**Comment Number 186**
**From** Anthony Teal

**Statement**
There is a desperate need to protect the green belt areas around Burpham as much as possible. This is already becoming an extensively urbanised location and the essential criteria safeguarding these aspects must be preserved.

**Action:** Move to supporting Comments

**Recommendation:** Noted

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**Comment Number 200**
**From** GBC

**Statement EN 4: Local Green Space**
3.19 The policy refers to an NPPF ‘clause’. The convention is to refer to NPPF ‘paragraphs’.
3.20 We support the use of the Local Green Space designation to preserve the green spaces that make a positive contribution to Burpham. However, Local Green Spaces must be ‘demonstrably special to a local community and hold particular significance’ (NPPF paragraph 76). Some of the designated Local Green Spaces seem not to have had this test applied - see the comments against Appendix 3. The NPPG states that ‘Whether to designate land is a matter for local discretion’. However, there still needs to be an explanation for why each space has been chosen. We suggest that further work is done to evidence the selection of sites for Local Green Space designation to ensure that all the spaces can be justified against this requirement.
3.21 The very large number of green spaces identified suggests that the main motivation for designation is to prevent development within the neighbourhood area. The NPPG section on Local Green Space states that ‘plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making’. At present, without the required justification for the selection of Local Green Spaces, the plan appears to be working counter to this guidance and is therefore not compliant with basic condition 1.

**Action:** Noted Policy Amended

3.19 - Noted Policy Amended
3.20 - Noted we use our 'local' discretion
3.21 - All Local Green spaces sites within the 'built area' are landscape features placed by Estate designers and planners to meet the current (at time of Build) requirements set out by GBC planning department or its predecessor department. As a result they have matured into very special areas for the adjoining properties.

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**B-EN 6: Natural Features**

**Comment Number 25**
The plan shall protect the visual amenities of the natural features of the ward and its internal boundaries. An environmentally healthy community is evidenced by the quality of the natural environment and the appearance it provides in the near and distant panoramas. The Burpham community’s frames of reference are near views of old field line hedges interspersed in the community itself, with mature and semi-mature trees of the old rural village; with the more distant views of the Wey valley to our adjoining wards which provide both flood plain, healthy tree lined vistas and panoramic views to the North Downs, crowned by the AONB of the Surrey Hills.

*From DR Statement* [Thames Basing Heaths SPA requires that the Plan is subject to a screening exercise, and possibly a SEA. Also refer to the avoidance strategy.]

Development will be permitted that protects and enhances sites of interest for nature conservation.

The visual impact of new development on views from the countryside should be minimised.

The following views have been identified as important: [list of relevant views from landscape and townscape studies]

New policy on Local Green Space: The following site is allocated as Local Green Space. Development will not be permitted except in very special circumstances. [could repeat list of appropriate development from the Green Belt policy]

**Action:** Recommendation: Noted

**Comment Number 91**

*From Angelina Taylor*

**Statement** It is important that we preserve the definition between one village another with natural characteristics such as open views.

**Action:** Recommendation: Noted

**Comment Number 122**

*From Martin Grant*

**Statement** Draft Policy EN6: Natural Features

3.16 Policy EN6 seeks to “…protect the visual amenities of the natural features of the ward and its internal boundaries”. Its stated rationale seeks to “…prevent houses and developments emerging above the tree line, thereby changing the character of rural views, with which Burpham is comfortable, to a suburban environment type vista of central of Guildford”.

3.17 The draft NP does not identify any natural features within Gosden Hill, however, any local views towards its proposed development will be mitigated or, where possible, enhanced. MGH raises no objection to draft Policy EN6 but wishes to highlight that the development of Gosden Hill will not interrupt public views to or from the AONB or the Wey Valley.

**Action:** Recommendation: 3.16 - Noted

3.17 - Noted

**Comment Number 160**

*From John Lobley*

**Statement** I agree with this policy which preserves these historic natural features

**Action:** Recommendation: Noted

**Comment Number 192**

*From Worplesdon Parish Council - Gaynor white*
Statement The Parish Council supports the provision of a link road from Slyfield Industrial Estate and Clay Lane. We note the Burpham NP’s request for the sound proofing of Clay Lane and London Road if the link road is built. Worplesdon Parish Council would want to know full details of the proposal before being able to comment in detail on this suggestion.

Action: Recommendation: Noted - The link road is NOT supported by this plan, as it will increase traffic within the community to a level which is unacceptable, when the solution to the ‘Slyfield problem’ is a sensible traffic management scheme at the Moorefield A320 Junction. Noting this proposal would increase traffic and cause a rat run through Burpham if constructed - It would directly affect over 130 properties with increased Noise levels - The Road would also go across the flood plain, directly increase noise levels within Burpham and cut across the Green belt - Affect the historic Views from Burphams Green Spaces. The distance to the A3 from a start point of Central Slyfield to the A3 would increase from 1.346 miles to 2.029 on the outward journey and to 3.508 on the inward journey through residential roads - thus this proposal is unsustainable.

(http://www.freemaptools.com/measure-distance.htm). It will also cause problems with the at capacity sewer Systems which floods at 80% maximum of river height records. (2.03m at Merrow stream EA gauge)

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Comment Number 202
From GBC
Statement 3.24 The supporting text states that the aim of the policy is to control the heights of buildings so that they do not emerge above the tree line. The policy wording is vague and is not sufficiently clear or precise to meet this aim. The text of the policy needs to state clearly what developers need to achieve or avoid. As written, development management officers will find this policy difficult to implement.

3.25 Some of the text in the policy box might be better in an introduction, setting a scene and establishing a need for the policy.
Action: Recommendation: 3.24 - Noted;
3.25 - Noted; Amended

B-EN 7: Energy Efficiency [obs]
Comment Number 26

The energy efficiency of new developments will be expected to meet the latest code for sustainable homes set out in current National Building Regulations Part L, requiring an Energy Performance Certificate of ‘B’ rating or better for all new properties or the successor "standing document" while maintaining this standard as a minimum requirement.
Level 4 of the code of sustainable homes and a minimum 10% of the properties' energy requirements to be provided through zero or low carbon technology.

From DR
Statement Policy EN6: Energy Efficiency
The policy sets a standard which is not necessarily clear or in force in terms of what Guildford are currently applying. It should also be noted that Guildford may stop applying such standards which would leave the policy obsolete.
Generally the policy is fine and can be used for the determination of planning applications.
Action: Recommendation: Proposals for all new residential development will be expected to meet the Code for Sustainable Homes Level 4. Proposals for major non-residential development will be expected to meet the BREEAM (or equivalent) rating of ‘outstanding’
**B-EN 7: Adapting to and mitigating climate change**

**Comment Number 1**

All new development including extensions and rebuilds within Burpham should seek to achieve high standards of sustainable development and, in particular, demonstrate in proposals how design, construction and operation have sought to:

- Reduce the use of fossil fuels;
- Promote the efficient use of natural resources, the re-use and recycling of resources, and the production and consumption of renewable energy;
- Adopt and facilitate the flexible development of low and zero carbon energy through a range of technologies:
  - Extensions and alterations should link the provision of low and zero carbon energy technologies to the existing building;
  - Adopt best practice in sustainable urban drainage systems (SUDS).
- Support of Solar Energy Systems in Roof when not in conflict with Character or other policies.

The Plan will encourage energy saving by using appropriate schemes, where technically and commercially viable. For example the incorporation of photovoltaic solar panels in a sound barrier along the A3 in the area.

*From* Natural England  
**Statement** Habitats Regulations Assessment

Natural England advise that the Plan area lies within 2km of the Thames Basin Heaths Special Protection Area (SPA) European Wildlife Site (also commonly referred to as a Nature 2000 site), and therefore has the potential to affect its ecological interest. European wildlife sites are afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (the ‘Habitats Regulations’).

**Action:** Noted

**Recommendation:** Noted

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**Comment Number 40**

*From* Thames Water  
**Statement** Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports water conservation and the efficient use of water and consider that this should be referred to in Policy EN7.

Thames Water have their own water efficiency website:  
www.thameswater.co.uk/waterwisely  By exploring our interactive town, Water wisely, you can discover how you can start saving water, help protect the environment, reduce your energy bill and even cut your water bill if you have a meter. You can calculate your water use, see how you compare against other Thames Water customers and the Government’s target, and get lots of hints and tips on how to save water. Thames Water customers, can also order a range of free devices to help save water.

However, managing demand alone will not be sufficient meet increasing demand and Thames Water adopt the Government’s twin-track approach of managing demand for water and, where necessary, developing new sources, as reflected in Thames Water’s Water Resource Management Plan. Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water...
levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness.

With regard to surface water drainage, we consider that the following paragraph should be included in the Neighbourhood Plan: “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”

**Action:** Recommendation: Noted

Comment Number 61
From Liz Hyland
Statement Agree
Action: Recommendation: Noted

Comment Number 123
From Martin Grant
Statement Draft Policy EN7: Adapting to Climate Change
3.18 Policy EN7 seeks to ensure all new development achieves high standards of ‘sustainable development’ which has been designed, constructed and operated to:
• “Reduce the use of fossil fuels;
• Promote the efficient use of natural resources, the re-use and recycling of resources, and the production and consumption of renewable energy;
• Adopt and facilitate the flexible development of low and zero carbon energy supply systems through a range of technologies:
• Ensure that extensions and alterations link the provision of low and zero carbon energy technologies to the existing building;
• Adopt best practice in sustainable urban drainage systems (SUDS) because of flooding”.

3.19 Whilst the aforementioned measures are acceptable in principle, they should not be applied so rigidly that the viability of development is compromised. MGH recommends that the draft NP better aligns Policy EN7 with proposed Policy 7 of GBC’s emerging Local Plan which shows regard to viability or practicality. MGH recognises that viability can act as an obstacle to housing delivery, and as the NPPF states at paragraph 173, development should not be subject to such a scale of obligations and policy burdens that its ability to be developed viably is threatened. Paragraph 173 of the NPPF continues by stating that, to ensure viability, the costs of any requirements likely to be applied to development should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and a willing developer.

**Action:** Recommendation: 3.18 - Noted

3.19 - This attempts to Connect the Neighbourhood Plan with an emerging Local Plan that has no Statutory basis - see 2.3 Note; this policy ensures a High-level of Flexibility.

Comment Number 161
From John Lobley
Statement I agree that any development in Burpham should be done in the most environmentally sustainable manner possible

**Action:** Recommendation: Noted

Comment Number 203
From GBC
3.26 We support the thrust of this policy. However, the policy contains climate change actions that cover both adaptation and mitigation. The title could be changed to reflect this content e.g. 'Adapting to and mitigating climate change'.

3.27 The policy suggests specific support for the incorporation of photovoltaic solar panels in a sound barrier along the A3. Comments collected during the survey (Appendix 5, A6) indicate a lack of support for this idea, but a large amount of support for solar power on roofs within the urban area. However, specific support for solar panels on the A3 has been included in the policies (both this policy and policy FD5) while specific support for roof mounted solar panels has not. There is no explanation provided for this choice and this seems to run counter to collected evidence.

**Action:** Recommendation: 3.26 - Noted Amended
3.27 - Insert Bullet - Support of Solar Energy Systems in Roof when not in conflict with Character or other policies.

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**B-FD 6: Water Supply & Sewerage Infrastructure**

**Comment Number 20**

Approval for developments will be granted once the developer has demonstrated that:

- Demand for water supply and network infrastructure both on and off site and can it be met.
- Demand for Sewage Treatment and network infrastructure both on and off site and can it be met and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met, and
- Inaccordance with the other relevant policies in this Plan

*From* Thames Water

*Statement* Now FD 6

“Water Supply & Sewerage Infrastructure

It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.

Further information for Developers on water/sewerage infrastructure can be found on Thames Water’s website at:

http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm

Or contact can be made with Thames Water Developer Services By post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;

By telephone on: 0845 850 2777; Or by email: developer.services@thameswater.co.uk”

**Action:** Recommendation: Noted - Appendix 8 now reflects concerns

*Comment Number 82*

*From* Angelina Taylor

*Statement* Now FD 6:

I agree with Note 1 as the recent floods have demonstrated a sustainable solution needs to be found to ensure that surface flooding is kept to a minimum.

**Action:** Recommendation:
Comment Number 108  
From Robert Hanford  
Statement  Now FD 6  
An important provision and thank you for including it. The watercourse which runs along the back of Great Oaks Park and Winterhill Way draining the land towards Clandon, has since upstream drainage changes in 2001 run at capacity after heavy rainfall. Any future development of Gosden Hill Farm needs to take account of this. Prior to 2001 the watercourse supported Frogs, Toads, Dragonflies and other pond life. Now the deluge after heavy rain scour the stream obliterating any life in the water.  
Action: Recommendation:  Noted - Appendix 8 now reflects concerns

Comment Number 116  
From Anthony Morgan  
Statement  Now FD 6:  
I have read the draft neighbourhood plan and would like to submit a comment on Policy FD6: Water Supply and Sewerage Infrastructure. My reason for this submission is the experience from the flooding earlier this year which highlighted the deficiencies in the existing infrastructure in some areas that contributed to the severity of flooding in those areas. 
Specifically, with regard to the supporting text, note 1, I believe the last sentence covering the responsibilities of the developer and water company is too weak. Suggest the sentence includes a requirement that the developer and water company must agree, in writing, what improvement are required and how they will be funded for consideration by the planning authority, before planning permission is granted. Otherwise there may be a temptation for a developer to proceed with a development with an inadequate/marginal infrastructure in place. Then once the development is completed and there are empty properties available, apply political pressure, submit appeals etc. in an attempt to reduce the infrastructure standards in the particular project to allow them to sell the properties without the cost and the reduced profits associated with upgrading the infrastructure. Future residents may then suffer from the consequences of inadequate planning controls.  
Action: Recommendation:

Comment Number 263  
From GBC  
Statement 3.66  This policy, as worded, suggests that planning permission will be granted in every case when all the criteria are met (‘Approval for developments will be granted...’). We suggest rewording it clearly so that permission will only be granted where a development is shown to have no adverse impact on the issues stated in the bullet points. 
3.67 The meaning of the third bullet point is not clear. The policy would be clearer if the third bullet is written as follows, or similar:  
The surface water drainage requirements and flood risk of the development both on and off site can be met. 
3.68 The sentence ‘Sustainable Drainage Systems (SUDS)’ is not a complete sentence and it is not clear what the requirement it. Will the plan require all developments to include SUDS? This might not be feasible on smaller sites and the wording of the policy needs to reflect this. 
3.69 The note regarding Thames Water would more appropriately sit in the supporting text.  
Action: Recommendation:  3.66 - Noted -amended as recommended "and inaccordance with the other relevant policies in this Plan"
3.67 - Noted - Re-word SWD requires both on and off site can be met and flood risk can be mitigated to meet Environmental Agency requirements.
3.38 - Noted - Remove 'SUDS'
3.69 - Noted Move to Supporting Text append Floodin Data to Appendix (replace Appendix 8)

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Comment Number 145
Title
From Anthony Teal
Statement Now FD 6: In view of the existing flooding problems in Burpham it is important that new developments do not add to the problems. I support this policy
Action: Recommendation:
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Comment Number 154
From Mike Piper
Statement Now FD 6: The Section that I was able to read skips over drainage. This is a vital concern and part of the development should surely require developers to contribute to an enhances sewage treatment facility which would remove the odour of urine from the air. Also dredging of the river wey or some serious method of dealing with massively increased surface water resulting from climate change and huge numbers of extra dwellings. This would require a massive culvert with huge pumps leading to a vast reservoir or the sea. Let us do this before we suffer as the Somerset levels suffered recently.
Action: Recommendation: Noted - Appendix 8 now reflects concerns
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Comment Number 171
From John L obley
Statement Now FD 6: I agree with this sensible policy
Action: Recommendation: Noted
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Comment Number 188
From Anthony Teal
Statement Now FD 6: This is an area which seems to have be seriously neglected in the past and provision that has been forthcoming seems to be largely inadequate, as recent events have shown. A robust approach to this aspect needs to be perused, particularly that of surface water management, as more development takes place
Action: Recommendation:

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**B-AC 1: Access to Natural Leisure Facilities**

Comment Number 137

This policy supports the improvement of foot access to Riverside Nature Reserve and Merrow Common ancient woodlands by way of better signage, walking surfaces and wider access paths to these natural community locations.

From Martin Grant
Statement Draft Policy AC1: Access to Natural Leisure Facilities

3.62 The above draft Policy supports accessibility improvements on foot to the Riverside Nature Reserve and Merrow Common Ancient Woodlands by way of better signage, walking surfaces, wider access paths and general maintenance of their communal access.

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3.63 MGH supports its objectives although recommends that continuity between this Policy and draft Policy EN4 is shown, particularly where draft Policy AC1 is promoting enhanced access to Merrow Common. Such improvements to access are necessary to ensure connectivity between Merrow Common and the public open space proposals forming part of the wider Gosden Hill, which include the provision of a new Local Nature Reserve and the delivery of new SANG.

**Action:** Recommendation: 3.62 - Noted
3.63 - Agreed Policy Amended

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**Comment Number 221**
From GBC

**Statement** 3.106 This policy needs some supporting text. This is not a land use policy. We assume this is part of a vision, or ‘would like to see’ list. This needs to be explained in the document.

3.107 The policy states that ‘Current road parking in Burpham Lane is an existing and increasing problem.’ This needs to be evidenced. Has this come from the neighbourhood survey? If so, this should be referenced.

**Action:** Recommendation: 3.106 - Noted - See Survey
3.107 - Noted - 3.106

**B-AC 2: Improvements to A3**

**Comment Number 45**

**Title 36**
As a requirement of the plan, sound proofing along the A3 Guildford bypass through Burpham is essential to improve the comfort and well being of the residents and shall be considered in any development proposal or potential increase of traffic levels. Overwhelming numbers consider the noise from the traffic a problem and if energy from solar panels can be incorporated within the sound barriers this would be of great benefit. The use of CIL & S106 monies to provide sound proofing is supported by this plan.

From Liz Hyland

**Statement** Agree

**Action:** Recommendation: Noted

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**Comment Number 72**
From Angelina Taylor

**Statement** The development of Gosden Hill will have a profound adverse effect on the A3 and the roads, namely the London Road. Sound proofing depending on the type used will look unsightly and change the character of Burpham to the detriment

**Action:** Recommendation: Noted

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**Comment Number 111**
From Robert Hanford

**Statement** Can I suggest an addition that priority is given to moving the southbound Merrow and Burpham slip road to the north into the space that was once occupied, if I recall correctly, by a lorry weighbridge facility. The revised slip road feeding into a new roundabout where London Road joins Merrow Lane. The aim being to siphon off Merrow and A25 traffic before it hits Burpham centre. I would hope this would reduce traffic along New Inn lane and rat running along the short narrow stub of the London Road from Great Oaks Park.
Action: Recommendation: This proposal fails to take into account of the Gosden Hill development thus should Gosden Hill not be developed it would be worthy of consideration - it fails to comply with the Local green space policies in appendix 3.

Comment Number 138
From Martin Grant
Statement Draft Policy AC2: Improvements to the A3
3.64 The above draft Policy reiterates the aspirations of the BNF for sound-proofing to be provided along the A3 through the use of CIL and S106 monies. MGH does not consider the draft Policy to be necessary and finds its inclusion within the draft NP ineffective given such considerations will be made at a County and Borough-wide level and addressed as part of any planning application within the appropriate supporting technical documentation, i.e. a noise assessment. On this basis, Policy AC2 is also considered premature; it pre-judges the findings of any noise assessment to be undertaken. MGH therefore objects to its inclusion for reasons relating to necessity and prematurity.

3.65 MGH also strongly objects to ‘note 2’ to draft Policy AC2 where it states that “Gosden Hill, if built, will mean London Road between Merrow lane and Clay lane will require noise mitigation installed”. This is an assumption which is not yet proven. As part of the proposals for Gosden Hill, it will need to be demonstrated, to the satisfaction of GBC and their statutory consulters, that impact arising from the proposed development upon local corridors, such as London Road, has been appropriately assessed and effective mitigation is proposed where necessary.

Action: Recommendation: 3.64 - Noise Levels are already available under Central Government Documents "Noise action Plan: Major Roads (outside first round agglomerations) Defra, March 2010 - mentioned in the Infrastructure baseline July 2013 - specific references Para 2.1.16 & specifically 2.1.22., Also the Sustainability Apraisal Scoping document at para5.3 second para states The A3 through Guildford also experiances a high Accident rate and community Severance and Traffic Noise cross refering to the DEFRA document on the subject.

3.65 - No Assumption - documentations referred to in 3.64

Comment Number 182
From John Lobley
Statement I wholeheartedly agree with this policy
Action: Place in supporting Comments
Recommendation: Noted

Comment Number 196
From Anthony Teal
Statement Traffic noise is now becoming a very disturbing and deleterious pollutant and this represents a sensible and pragmatic way to try and deal with the problem
Action: Place in Supporting comments
Recommendation: Noted

Comment Number 222
From GBC
Statement 3.108 This policy needs some supporting text. This is not a land use policy. We assume this is part of a vision, or ‘would like to see’ list. This needs to be explained in the document.
3.109 Some of the text in the policy sounds like supporting text. Can this be removed from the policy box to the supporting text to make it clear to the reader which is supporting text and which is policy?
3.110 The policy states ‘sound-proofing along the A3 Guildford bypass through Burpham is essential to improve the comfort and well-being of the residents’. This needs to be evidenced. We note this issue was raised in the neighbourhood survey. Can this evidence be referenced?

**Action:** reference Survey

**Recommendation:** 3.108 - Noted - Same as 3.106
3.109 - Noted - Take out As a Priority of the plan
3.110 - Refer Defra report Noise Action Planning First Priority Locations Major roads Tile 133

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**Comment Number** 56
**From** Liz Hyland
**Statement** Agree

**Action:** **Recommendation:** Noted

**B-FD 1: General development standards**

**Comment Number** 31

<table>
<thead>
<tr>
<th>Development will be permitted where it complements and enhances the character of the local area. The new built form, including extensions, will need to promote designs and scales in harmony with existing character of its location within the ward, and requires new development to respect established street patterns, plot sizes, building lines, topography of established views, land mark buildings, roof treatment aspect relationship with other buildings.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>From</strong> GBC</td>
</tr>
<tr>
<td><strong>Statement</strong> Policy FD1 – The Built Environment</td>
</tr>
</tbody>
</table>

Generally a good land use planning policy giving clear direction to the decision maker. However, the policy seems to be trying to deal with too many issues and would benefit from being split up into a number of policies dealing with extensions, new residential development etc.

Some concerns over the blanket density requirement to be placed across the entire Neighbourhood Area. This will need strong evidence to justify as there is no strong justification as to why densities outside of this range would be harmful.

The policy states that all development should incorporate public open space but this could make some development unviable and may not always be necessary. It is also not clear on what size developments this policy is to be applied (as presently worded this could be applied to an application for a single dwelling).

**Action:** **Recommendation:** Noted

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**Comment Number** 42
**From** Philip Johns

**Statement** my observations Are that any talk about development seems to be met with a negative reaction, the website talks about the future and our children, if the community continues to fight any development plans there will be no future as our children will have no where to live and will be driven out of the area, some of the aims should be to accept that we need to develop (the population is growing!) but the fight should be to develop in the right way - with property that our children and people from the local community can afford, currently all of the development in the area is larger and more expensive properties of which
are not affordable to the younger local generation, if this continues local youngsters will have no option but to move away, so I believe the aim should be to fight for what the area needs rather than fighting to stop anything changing - yes we would all love to keep the area similar to what it is today but the world is changing, the population is changing and we need to address the changes as best we can so that they work for the local communities advantage rather trying to stop every development idea. I have friends in the local area all with children that have just finished school or university, 3 out of 4 have moved away from the local area as there is nothing that is affordable for them to rent or buy.

**Action:** Recommendation: Noted

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**Comment Number 57**

**From** Liz Hyland

**Statement** Agree

**Action:** Recommendation: Noted

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**Comment Number 87**

**From** Angelina Taylor

**Statement** I wholly support the Note 1 in the Supporting Text however the over emphasis on building houses in this area of Guildford is worrying when there are other areas of Guildford that are run down and drab and need developing to improve the area, for example South Guildford

**Action:** Recommendation: Noted - Comment about Local Plan Not Neighbourhood plan

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**Comment Number 99**

**Title** 14

Development will be permitted where it complements and enhances the character of the local area. ‘The new built form, including extensions, will need to promote designs and scales in harmony with existing character of its location within the ward, and requires new development to respect established street patterns, plot sizes, building lines, topography of established views, landmark buildings, roof treatment aspect relationship with other buildings.

**From** Patrick Kelly

**Statement** Note 1, 5th Line misspell – ‘Garage’

Note 3, how can reduction in density be achieved across Guildford Borough when numbers proposed in draft Local Plan will lead to considerable building in green belt areas. Also, it would appear to be an unnecessary comment as the density of building does not apply within the Burpham area due to a lack of land remaining for development (although Burpham will be affected by a Gosden Hill Farm development).

**Action:** Recommendation: Noted - Spelling amended - comment outside plan area

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**Comment Number 128**

**From** Martin Grant

**Statement** Draft Policy FD1: General Development Standards 3.30 The above draft Policy is permissive of development which “…complements and enhances the character of the local area” and which promotes “…designs and scales in harmony” with such character”. It requires new development to “…respect existing street patterns, plot sizes, building lines, topography of established views, landmark buildings, roof treatment and aspect relationships with other buildings”.
3.31 MGH objects to draft policy ED1 in its current form, which is considered to be unduly restrictive. Local Planning Authorities are required to assess development proposals on a site by site basis, taking into account its location as well as its context and that of the surrounding area. Applying draft policy ED1 to all development would not prove effective for larger development sites, such as those of a strategic nature (for example Gosden Hill), as the character of the surrounding area is less clearly defined.

3.32 MGH therefore recommends that the general design principles as set out in Policy ED1 should exclude major strategic sites whose design is guided, at a strategic level, by proposed Policy 6 within the emerging GBC Local Plan. Of greater use would be a design and character assessment of Burpham which could inform design and density related policies and more importantly help inform development control planning decisions.

Action: Recommendation: 3.30 - Noted
3.31 - We assume FD1 not ED1 throughout. The part of Gosden Hill Neighbourhood plan area is Greenbelt and Grade 1 Farmland.
3.32 - Sufficient flexibility is in the Policy and detailed character assessment exists in Appendix 2
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Comment Number 166
From John Lobley
Statement I agree with this policy as high density development contributes to stressful living and should be avoided
Action: Recommendation: Noted
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Comment Number 207
From GBC
Statement 3.39 We support the general thrust of the policy, which is to preserve local character and ensure houses that are built are pleasant to live in.
3.40 Note 1 makes reference to comments from residents that support low density dwellings. These comments are not provided in the evidence base and there is no information as to when and how these comments have been collected (e.g. through a public consultation, as part of the neighbourhood survey etc.). This evidence needs be published. However, as the policy makes no reference to prescribed density this text does not seem to be supporting the policy and could be removed.
3.41 Note 1 makes reference to ‘two-level accommodation’. It is not clear what this refers to. Can this be replaced by a clearer term?
3.42 Note 2 provides support for setting a local approach to housing density. However, the policy is not setting a density requirement. Has this note been left in from a previous version of the policy in error? As Note 2 recognises, the NPPF requires local planning authorities to boost significantly the supply of housing. A policy that restricts density is likely to do the opposite.
3.43 Note 3 states that evidence supports a reduction in density from 40 dwellings per hectare to 35 dwellings per hectare. However, the policy makes no mention of prescribed density. Has this note been left in from a previous version of the policy in error? If there is to be a policy supporting density at 35 hectares, the text will need show how this figure has been arrived at and provide a robust planning justification for this if it is to be enforced during planning applications and defended at appeal.
3.44 Note 3 states that ‘the latest Shlaa GBC 2013 demonstrates there is sufficient land in the Borough, to enable a reduction in the density from 40 per hectare’. The SHLAA looks at individual sites on a case by case basis, taking a view on what density may be appropriate on
each particular site. All new homes provided contribute towards the borough’s overall housing requirement; there is not a separate housing target for individual areas such as Burpham. The SHLAA identifies all known suitable, available and viable land for new homes regardless of housing number. It does not set policy, and does not identify scenarios relating to density. It would not be possible to make this assertion based on the SHLAA. New residential development in urban areas needs to make the most efficient use of land so it would not be appropriate to set a density limit when a higher density may be suitable and achievable.

Action: Recommendation: 3.39 - Pleased for the support.
3.40 - Noted available identifiable in written survey responses
3.41 - Amended ground floor plus two additional floors
3.42 - Noted and amended (removed)
3.43 - Note 3 Removed
3.44 - Noted - Removed

Current domestic buildings cover 5.404% of land while Domestic Gardens cover 23.324% of land giving a land use per household of 36.542 dwellings per Hectare thus a 35 per hectare dwelling rate is within character - from figures supplied by Guildford society.

Comment Number 43
From David Howells
Statement Would it be worthwhile specifying that new build houses should be no more than two stories high (in keeping with the majority of the existing housing stock) and that developments in loft spaces will not be permitted where it would raise the roof line above that of any surrounding dwellings (taking site lines from all angles)? Also I wonder if the wording of the open space element of the flats restriction is clear enough. For example, I think that this would allow a development similar to the Brambles. The private space is probably twice the size of each individual flat, but it would not be twice the size of the floor area of ALL of the flats.
Action: Recommendation: Noted - amended

B-FD 2: Location of Development - Obsolete

Development generating significant numbers of trips will only be allowed in locations highly accessible by public transport (including park and ride) and served by existing cycle and pedestrian routes. Planning permission will only be granted for this form of development in other locations where adequate provision exists or has been made for improvements to public transport services (including park and ride) and improved access for cyclists and pedestrians.

From Angelina Taylor
Comment Number 86
Statement This is sensible and sustainable, it ensures that trips in the car are kept to a minimum.
Action: Recommendation: Noted

Comment Number 129
From Martin Grant
Statement Draft Policy FD2: Location of Development
3.33 Draft policy FD2 is permissive of major trip generating development providing it constitutes a location which is “…highly accessible by public transport (including park and ride) and served by existing cycle and pedestrian routes”. In other locations, it is
supportive of such development providing measures are made for improvements to such facilities.

3.34 MGH objects to draft Policy FD2 in its current form given it is negatively worded and fails to take into consideration wider sustainable transport measures which major development can deliver. MGH therefore recommends the rewording of the second sentence to FD2 so that it reads:

“Planning permission will only be granted for this form of development in other locations where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Development should be located and designed where practical to accommodate the efficient delivery of goods and supplies and give priority to pedestrian and cycle movements, and have access to high quality public transport facilities” adequate provision exists or has been made for improvements to public transport Services (including park and ride) and improved access for cyclists and pedestrians.”

3.35 MGH agrees that new major development should be highly accessible and in doing so, wish to highlight the accessibility credentials associated with their proposals for Gosden Hill which include:

• A new southbound on and off slip road;
• Pedestrian and cycle improvements with way finding strategy; and
• A comprehensive public transport strategy which will facilitate the delivery of a new transport hub comprising a new ‘Merrow’ rail station, a new Park and Ride facility and local bus services and priority measures.

3.36 A new Merrow rail station will improve not only the accessibility of Gosden Hill but that of the wider Burpham area, providing a direct route to Guildford and London. It is also envisaged that a new rail station in this location will facilitate the regeneration of the GBC owned Merrow Depot to the south of Gosden Hill.

3.37 A new Park and Ride facility will improve radial routes by helping to reduce traffic volumes along the A3 and London Road. It will be integrated into the Gosden Hill site, within walking distance of its future residents.

3.38 Gosden Hill will be designed to achieve a walkable neighbourhood, enhancing the existing network of footways and cycle ways within its vicinity. A way finding strategy will link the Site with Burpham and Bushy Hill, with onward links to Guildford, local schools and facilities.

Action: Amend Policy to wording: -
Recommendation: 3.33 - No Comment
3.34 - Amend as Recommended by MGH
3.35 - No Comment: Detailed proposals are yet to be released so difficult to comment on this undrafted Proposal - main content outside Plan Area
3.36 - No Comment: Detailed proposals are yet to be released so difficult to comment on this undrafted Proposal - main content outside Plan Area
3.37 - No Comment: Detailed proposals are yet to be released so difficult to comment on this undrafted Proposal - main content outside Plan Area
3.38 - No Comment: Detailed proposals are yet to be released so difficult to comment on this undrafted Proposal - main content outside Plan Area

Comment Number 167
From John Lobley
Statement I agree with this sensible policy
Action: Recommendation: Noted

Comment Number 208
From GBC
Statement 3.45 This policy needs some supporting text and an adequate planning justification.

3.46 There is no definition of ‘Highly accessible’ or ‘development generating a significant number of trips’. This could lead to confusion during planning applications and appeals.

3.47 The policy is vague where it refers to ‘this form of development in other locations’. It must be explicit that it is referring to developments that generate a significant number of trips.

Action: Recommendation: 3.45 - Noted
3.46 - FD2 Deleted
3.47 - N/a

B-FD 3: Green Man Site

The results of the Survey indicate that most regret the loss of the old historic inn [site pre: circa 1500] and later the family restaurant used as a community meeting place. A majority of the community respondents do not want a supermarket on this very small site with the traffic and parking problems it would bring.

Planning permission was granted in February 2014 for a class A1 retail outlet during the drafting of this document.

The community wishes this central prominent brownfield site to be carefully considered for a family-friendly café/licensed restaurant/community hall/medical centre with sufficient parking on it, should it become available during the life of the plan.

If this were not commercially viable as a community usable facility, a small development of low rise flats with adequate parking would be acceptable in line with adjacent residential developments, subject to normal planning controls and conditions.

Comment Number 32
From Darren Richards

Statement Policy FD2 – Green Man Site

This seems to be a site specific proposal that is resisting the development of the site as a supermarket. As I understand planning permission has been refused for the site. I have briefly reviewed the papers and it appears officers recommended the proposal be approved. Notwithstanding this however I understand from the Forum that the applicant does not wish to appeal the decision and will be looking to resubmit a fresh planning application in due course.

The policy states that the reason a supermarket would not be acceptable is due to the traffic impacts it would generate. As such it may be worth revising the policy setting out the criteria any new development would need to meet (adequate parking, not to give rise to additional traffic etc.) in any redevelopment of the site. However, these issues should be given due consideration by the LPA when looking to determine applications (whether there is an up to date Local Plan or not).

Action: Recommendation: well as evidence to demonstrate there is no need for a supermarket. Look to place some criteria on the redevelopment of the site.

Planning permission on the Green Man site will be granted for a mixed-use development comprising residential (C3) and a community facility (D1 or C2). Any other development proposal will need to demonstrate that it will not have an adverse impact on road safety, traffic flow, residential amenity and the local environment.

[a pub/restaurant is not included in the policy, as this use class can convert to retail without the need for planning permission]

Comment Number 55
From Liz Hyland
**Statement** I am strongly opposed to Aldi being given permission to build a supermarket on this site and do not think GBC have given enough consideration to the traffic problem this will cause. I am also appalled by the duplicity of certain members of the council/planning committee who dealt with this.

**Action:** Recommendation: Noted

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**Comment Number 85**
From Angelina Taylor
**Statement** It is disappointing the council refuses to listen to local residents. Surely was live here we know what we want and what is best for the area and residents. Perhaps they will listen, when we ask for a community facility.

**Action:** Recommendation: Noted

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**Comment Number 100**
From Patrick Kelly
**Statement** Second Para – this appears to be wishful thinking – Planning Permission has been granted and Aldi are unlikely to move out within the Neighbourhood Plan timescale.

**Action:** Recommendation: Noted - Policy amended to reflect concerns

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**Comment Number 107**
From Robert Hanford
**Statement** I find this section negative and does little credit to the document as it seems to smack of sour grapes at the planning permission granted to Aldi. Can the document reflect the reality and refer to the Green Man/Aldi site. Can the document look forward at how the Aldi development can increase footfall along Kingspost Parade and look at the retail area as a whole. For example recognising that both car parking areas will be used to access both retail areas. Aim to work with Aldi management to have consistent parking restrictions and enforcement on both sides of the London Road. To look at the provision of an Aldi shopping trolley park in Kingspost Parade and require Aldi to charge a deposit for shopping trolley use to prevent shopping trolleys being abandoned in the surrounding area.

**Action:** Recommendation: Noted - Policy amended to reflect concerns

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**Comment Number 168**
From John Lobley
**Statement** I agree with this policy as a place of refreshment has existed on this site for centuries and a supermarket is unnecessary and inappropriate

**Action:** Recommendation: Noted

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**Comment Number 209**
From GBC
**Statement** 3.48 This policy needs some supporting text. Some of the text in the policy box would more accurately sit within an introduction and reasoned justification.
3.49 It is not clear what future developers on the site need to achieve or avoid. This policy, as written, sounds like a vision statement. We suggest moving this to a vision section, or rewriting the policy so it is clearer as a policy statement as to what is acceptable.
3.50 It would be difficult for the planning authority to preclude retail use of the site given the planning history and national planning policy on the sequential assessment. However this does not mean a vision for the site cannot be included in the neighbourhood plan.

**Action:** Recommendation: 3.48 - Noted
3.49 - Noted
3.50 - Noted
B-FD 4: Support for Younger People

Comment Number 54

Development should reflect the needs of the younger generation allowing them to get on the first rung of the housing ladder. Future housing development should demonstrate the ability for shared equity. Any new housing stock should be of a size and proportion which maintains the characteristics of the community in accordance with policy FD1.

From Liz Hyland

Statement This point is well made and very important.

Action: Recommendation: Noted - amended to reflect concerns

Comment Number 84

From Angelina Taylor

Statement It is important that there is a cross demographic of ages. To encourage home ownership in the young in ensuring the vibrancy of the village. A positive way to influence this is to make affordable housing accessible to them.

Action: Recommendation: Noted - Amended - now reflects concerns

Comment Number 130

From Martin Grant

Statement Draft Policy FD4: Support for Younger People

3.39 The above draft Policy seeks to provide support for younger people, helping to “...get them on the first rung of the property ladder” by requiring new development to “...demonstrate the opportunity for shared equity” and “...be of a size and proportion which maintains the characteristics of the community in accordance with Policy FD1”.

3.40 MGH objects to the draft Policy finding it ineffective and unnecessary and failing to accord with both national and local planning policy which seeks to facilitate the delivery of a wide choice of homes to meet a range of housing needs. MGH suggests that to avoid the risk of confusion and conflicting policy objectives, matters of affordable housing provision are solely addressed by the emerging GBLP and draft Policy FD4 is deleted as a result.

Action: Recommendation: 3.39 - Noted
3.40 - Noted - Policy amended in accordance with GBC Response

Comment Number 169

From John Lobley

Statement I agree with this sensible policy

Action: Recommendation: Noted

Comment Number 210

From GBC

Statement 3.51 Affordable housing is not actually mentioned by name in the policy document. Several respondents in the comments section have raised it as something they would like to see in Burpham, and policy FD 4 is essentially an affordable housing policy. For clarity, it would be useful if the policy made reference to ‘affordable housing’ so that those reading the plan clearly understand the aim of the policy.
3.52 The policy seeks to favour shared equity above other forms of affordable housing. We note that this was the favoured affordable housing option in the neighbourhood survey. Can this evidence be presented in the supporting text to support the policy?
3.53 There is some evidence provided at note 1. However, it is not clear how this evidence is supporting the policy. This needs to be clearly explained in the supporting text. Some analysis and commentary would improve this section.

3.54 Note 1 makes reference to a ‘waiting list’. It would be helpful if this note were more specific and identifies the list (e.g. Housing Needs Register or the Joint Needs Register).
3.55 We recommend that this policy is reworked to reflect the housing needs of all, not just the young. The survey results show support for homes to meet the housing needs of all the community (E7 commentary).
3.56 We disagree with the policy focus on shared equity rather than other forms of affordable housing. Whilst we agree that there is a need for shared equity or similar schemes to help young people onto the housing ladder, there is also a much greater need for rented affordable housing, particularly in high value areas like Burpham.
3.57 The stated aim of the policy is to enable young people to get on the housing ladder. Current evidence demonstrates that shared equity homes are significantly less affordable than affordable rented homes due to the requirement for a mortgage. Examples that demonstrate this issue are attached at Appendix 1 of this document. This problem can be seen in practice as the Council is about to let out some shared equity properties that have been standing empty for a long period due to lack of interest. This problem particularly affects 1-bed shared ownership properties.
3.58 As well as often being unaffordable, shared equity schemes are not available to people who have a shared income of above £60,000 per annum. The high property values in the borough mean that many households that earn between £60,000 and £70,000 still cannot afford to purchase a house at market prices but would be excluded from shared equity affordable homes. The result is that the pool of potential buyers for shared equity homes can be quite small.
3.59 The draft Guildford Strategic Housing Market Assessment indicates that 10 per cent shared equity and 90 per cent affordable and social rented homes would be an appropriate mix to meet affordable housing provision across the borough. This evidence does not support favouring shared equity over other forms of affordable housing provision.
3.60 The NPPF (paragraph 184) states that neighbourhood plans should be aligned with the strategic needs and priorities of the wider local area. The delivery of affordable housing is a key strategic priority for the borough. This priority has been set out in the Council’s draft Local Plan: strategy and sites document, and the need for affordable housing has been demonstrated in the accompanying evidence base. Giving priority to shared equity does not meet the strategic needs and priorities of the wider local area and therefore does not meet basic condition 1.
3.61 We recommend amending the wording of the policy to ‘Future housing development should demonstrate the opportunity for shared equity, as well as contributing to meeting the identified need for other types of affordable housing’.

Action: Recommendation: 3.51 - 3.61 Noted; Policy to be re-written.

B-FD 5: Improvements to Infrastructure

New development will be expected to demonstrate during the planning process, appropriate levels of infrastructure to support the development. Policy B-FD5a Guildford Borough Council and Surrey County council are encouraged to request suitable financial contributions to fund improvements to local services. To include Reducing Traffic Congestion, disabled friendly footpaths, and Reduction of Noise Pollution for the community as a whole, where traffic noise will be increased by the additional traffic
generated by the development. By the use of CIL monies to ensure any noise generation locations are treated as a blight on the community and action taken to reduce this blight. The need for infrastructure & Services in the form of roads, shops, schools and public services such as doctors and dentists shall be adequately addressed during the planning application stage to ensure all services come on line before or in parallel to completion but before occupation of new homes.

Comment Number 15
From SCC
Statement Policy FD5 – Improvements to Infrastructure
Surrey County Council wishes to work with Guildford Borough Council and Burpham Neighbourhood Forum to use monies secured from developers to fund improvements to schools and to manage congestion.
Action: Recommendation: Noted

Comment Number 19
From Thames Water
Statement Policy FD1b & FD5 – Water Supply and Wastewater/Sewerage Infrastructure
Thames Water support the reference to surface water and sewage drainage, but consider that further guidance is required.
A key sustainability objective for the preparation of the Neighbourhood/Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: “Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver......the provision of infrastructure for water supply and wastewater....”
Paragraph 162 of the NPPF relates to infrastructure and states: “Local planning authorities should works with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment....”
The new web based National Planning Guidance published in August 2013 includes a section on water an wastewater infrastructure and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs.
Regarding the funding of water and sewerage infrastructure, it is Thames Water’s understanding that Section 106 Agreements can not be required to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.
It is important that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.
It is therefore important that the Neighbourhood Plan considers the net increase in water and waste water demand to serve proposed developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.
Thames Water therefore recommend that developers engage with them at the earliest opportunity to establish the following:

- The developments demand for water supply and network infrastructure both on and off site and can it be met
- The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met

To accord with the NPPF and the above, text along the lines of the following should be added to the Neighbourhood Plan:

Action: Recommendation: Noted

Comment Number 53
From Liz Hyland
Statement Agree
Action: Recommendation: Noted

Comment Number 70
From Dana Roe
Statement Submitted under Roads - general comments form: my observations are that the roads around and out of Weylea avenue are appalling. Either pot holes at the main junctions or passing points around the estate or inconsiderate parking around the loop of the estate especially on the bend when exiting my road, everyone parks on this bend and buses come flying round and if you are overtaking the many parked cars, it is an accident waiting to happen.

I think the bus should not come round Weylea Avenue at all.

Also the roundabout exiting the estate should be yellow boxed so that you can get out if it in the morning. With commuter and school traffic, this roundabout is blocked for those wishing to turn right into London Road. It is frustrating!

Action: Recommendation: Noted

Comment Number 83
From Angelina Taylor
Statement As the roads are very congested around Burpham, new roads need to be carefully considered so that they have a minimal impact on the overall ambience and character of the area

Action: Recommendation: Noted

Comment Number 103
From Highways Agency - Anne Nugent
Statement Thank you for consulting the Highways Agency about the pre-submission consultation of the Burpham Neighbourhood plan.

I can confirm that we have no objections or other comments on the plan.

Action: Recommendation: Noted

Comment Number 131
From Martin Grant
Statement 3.41 The above draft Policy encourages GBC and SCC to request “...suitable financial contributions to fund improvements to local services” which should include:
- Road congestion prevention
- Disabled-friendly footpaths; and
Sound proofing for the community as a whole where traffic noise will be increased by the additional traffic generated by the development. The draft NP notes in particular that this should come forward through Community Infrastructure Levy (CIL) monies.

3.42 The draft Policy goes on to state that local facilities should “…come online before or in parallel to completion but before occupation of new homes”.

3.43 Whilst MGH acknowledges that their future proposals for Gosden Hill will be required to appropriately mitigate any adverse impacts, the requirement for such should not fall to the BNF and as such, MGH objects to draft Policy FD5, finding it wholly unnecessary and a duplication of guidance set at Borough wide level.

3.44 MGH considers it essential that obligations are determined by GBC and/or SCC on a case by case basis, thereby facilitating the delivery of viable sustainable economic development and providing flexibility for unexpected costs. The need for such flexibility is set out within the NPPF at paragraph 205 where it requires Local Planning Authorities, when seeking planning obligations, to “…take account of changes in market conditions over time, and where appropriate, be sufficiently flexible to prevent planned development being stalled”. The Planning Practice Guidance (‘the PPG’) requires planning obligations to be “…fully justified and evidenced” and local policies for such to be “…grounded in an understanding of development viability through the plan making process” (Paragraph 007 of the PPG (23b-007-20140306)). When assessing the viability of their local planning policy, the PPG requires Local Planning Authorities “…allow for a buffer to respond to changing markets and to avoid the need for frequent plan updating” (Paragraph: 008 of the PPG (0-008-20140306)).

3.45 It should also be borne out that any obligations sought by GBC and/or SCC will need to meet the following CIL tests:

- It must be necessary to make the development acceptable in planning terms;
- It must be directly related to the development; and
- It must be fairly and reasonably related in scale and kind to the development.

3.46 In terms of the timing of facilities, which draft Policy FD5 seeks to deliver prior to, or in parallel with new development, MGHs’ proposals for Gosden Hill will deliver appropriately timed facilities which will come forward in phases to be agreed with GBC.

**Action: Recommendation:**

3.41 - Noted

3.42 - Noted

3.43 - Noted - Amended in accordance with GBC

3.44 - Noted

3.45 - Noted

3.46 - Noted

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**Comment Number 155**

**From** Mike Piper

**Statement** The proposal for the link road is utterly appalling and will destroy property values. Another junction should be developed on the A3 the Send junction which is in undeveloped land could be improved and the northbound only one at Burpham closed or reduced. Alternatively the Stoke Junction should be redesigned as a proper motorway standard interchange.

It is also time that consideration was given to blocking the through route via Weylea Avenue, Doverfield Road, Marlins Drive and Burpham Lane. This is used as a bypass for London Road. Obviously we could all choose a break point based on our individual preference. I think it would be satisfactory to block the Weylea Avenue/Doverfield Road Junction. This is not Ideal, from my standpoint, as it still allows the pointless loop in bus routes via Sutherland Drive and Weylea Avenue.
Action: Recommendation: Noted - though some comments outside plan area

Comment Number 170
From John Lobley
Statement I agree with this sensible policy
Action: Recommendation: Noted

Comment Number 187
From Anthony Teal
Statement This is absolutely vital for the successful growth and development of Burpham in a sustainable way in the future. Management of traffic, an aspect of great concern to all residents will need appropriate resources to ameliorate these problems
Action: Recommendation: Noted

Comment Number 211
From GBC
Statement 3.62 The policy states ‘In Policy FD6 Guildford Borough Council and Surrey County Council are encouraged to request suitable financial contributions to fund improvements to local services.’ Is this an error? Policy FD 6 addresses water supply and sewerage infrastructure only.
3.63 It is not clear what ‘road congestion prevention’ and ‘sound proofing for the community’ mean.
This needs to be explained so the policy requirements are clear.
3.64 Shops are not generally considered to be infrastructure, except perhaps a community run shop selling everyday groceries or something similar. Can this be reworded?
3.65 The policy asks for all services to come online ‘before or in parallel to completion but before occupation of new homes’. ‘Services’ usually refers to things like shops. Could ‘infrastructure’ be substituted for ‘services’? It is not possible to provide infrastructure up-front in many cases. For example, schools cannot be built before home occupation as they will then attract students from other areas and fill up before local students move in. It would be more appropriate to state ‘ready for when it is first needed’.

3.63 - Change wording to ’Reducing traffic Congestion & Reduction in Noise pollution.
3.64 - Noted -amended
3.65 - Noted changed from Services to Infrastructure and Services.

B-FD 5b Water supply and sewage infrastructure obs
Comment Number 52
Title 96
From Liz Hyland
Statement Now FD 6
You think this would be a basic requirement of any development but the fact that this needs to be included in the neighbourhood plan obviously means it is not.
Action: Recommendation: Noted - Appendix 8 now reflects concerns

B-FD 6: Housing Requirements. Obs
Comment Number 132

Housing need will be assessed on a Borough wide strategic basis.
From Martin Grant

Statement Policy FD6: Water Supply and Sewerage Infrastructure

3.47 MGH objects to draft Policy FD6, finding it unnecessary given that GBC, under their development management remit, require proposals to demonstrate how their demands upon utilities, services and infrastructure can be met and/or appropriately mitigated for. In addition, the NPPF requires development proposals to give priority to sustainable drainage systems. GBC, within their draft Local Plan and using CIL and S106 monies, will seek to ensure “...vital infrastructure is available when needed and where necessary through the use of phasing provisions” (Proposed Policy 17, draft Local Plan (July 2014)). On this basis, MGH recommends the removal of draft Policy FD6 in its entirety given fails to align accordingly with the Borough’s emerging strategic policy in this regard.

Action: Recommendation: 3.47 - Noted and amended as per GBC feedback

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**B-T 1: Parking Standards**

Comment Number 14

The preference is for assigned parking spaces within the curtilage of the site. With houses other than sheltered accommodation providing cycle storage at the rate of two cycle places per first bedroom and one per additional room. With studio flats providing one cycle storage place per studio. This is to encourage family trips with cycles and a safe storage position for this method of transport.

Burpham Parking Standard

<table>
<thead>
<tr>
<th>Studio apartments</th>
<th>1 cycle space</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 bedroom unit</td>
<td>1 Car Space / 2 cycle space</td>
</tr>
<tr>
<td>2 bedroom unit</td>
<td>2 car Spaces Minimum / plus 3 cycle spaces</td>
</tr>
<tr>
<td>3 or more bedroom unit</td>
<td>2 car Spaces Minimum / plus 4 Cycle spaces</td>
</tr>
<tr>
<td>4 or more bed houses</td>
<td>3 car spaces plus 5 cycle spaces</td>
</tr>
<tr>
<td>Elderly (sheltered):</td>
<td>0.5 car spaces per unit</td>
</tr>
</tbody>
</table>

Visitor Parking: If all parking of residents are provided ‘off road’ there will be space on roads adjacent properties for visitors and delivery vehicles to safely rest at the kerb side for the duration of their visit to the location.

From SCC

Statement Policy T1 - Parking

It may be appropriate to reference the Guildford Borough Council Vehicle Parking Standards (which do have a degree of flexibility in residential areas) and the Surrey Transport Plan Parking Strategy (2011) and Vehicle and Cycling Guidance (2012) in the supporting text to the policy.

Action: 20/05/14 Following extensive sustainability study both SCC and GBC parking restrictions are unsustainable due to the real problems they generate with on road parking and blocking of public transport routes causing PT services to be re-routed.

Recommendation: Ignore other regulations this policy is in line with Policy 7 Sustainable design and construction

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Comment Number 27

From DR

Statement Parking Standards

Provides very clear standards and is a land use planning policy. Some concerns over provision as it is stating that all development must provide significant parking. May not be able to justify against national policy and could make development unviable and undeliverable. Level of provision being asked for seems inflexible (lesser provision in...
exceptional circumstances only) and goes against the promotion of sustainable development. It could be very hard to justify that a 3 bedroom dwelling requires three parking spaces.

**Action:** 
**Recommendation:** Current policy lacks any evidence to support a change from the GBC/Surrey standards.

Development Proposals should meet as a minimum the parking standards set out by GBC. They should demonstrate that the level of provision of off-street parking will not result in on-street parking that would adversely affect road safety, traffic flow, residential amenity and the local environment.

Cycle parking should be provided in all new development in accordance with the following standards:

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**Comment Number 60**

**From** Liz Hyland

**Statement** Should use garages if they have them for parking cars not for storage or extra rooms this would ease parking.

**Action:** 
**Recommendation:** Noted

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**Comment Number 90**

**From** Angelina Taylor

**Statement** I agree that we should encourage cycle riding and the storage of cycles is an important feature of the decision making process when purchasing a cycle

**Action:** 
**Recommendation:** Noted

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**Comment Number 105**

**From** Robert Hanford

**Statement** I am guessing that you are constrained by National Planning restrictions aiming to minimise car use. The reality is that to purchase a home in the South East for most people requires two occupants and two incomes. Outside the M25 it is not unusual for both occupants to have cars to enable them to get to work. What you are proposing in the plan seems to underestimate the demand. The practical requirement in this section would be for all new homes to have a minimum of two parking spaces. Supporting text in other areas seems to hint at this.

**Action:** 
**Recommendation:** Noted - policy amended to 'whole' numbers

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**Comment Number 124**

**From** Martin Grant

**Statement** 3.20 The draft Policy, where it assigns local parking standards, is a duplication of Borough and County Council guidance and such, MGH objects to its inclusion, finding it unnecessary. It is also unclear, from draft Policy T1, exactly what standards are being proposed, other than for 4 bedroom or more homes and it is assumed that SCC guideline standards are being proposed on this basis.

3.21 Notwithstanding the above, and where it deals specifically with car parking design, MGH recommends the rewording of draft Policy T1 so that it meets good urban design and place making principles as set out most notably within Manual for Streets (at Figure 4.2), Car Parking - What Works Where (English Partnerships 2006) and the Urban Design Compendium (English Partnerships). On this basis, MGH recommends that draft Policy is reworded to read:

“A range of approaches to car parking design should be allowed for, including parking within curtilage (driveways/garages/car barns and car ports), parking courts, and on street parking. Non-curtilage allocated car parking should ideally to be located within
25m of individual dwellings, while within parking courts, a proportion of parking will be unallocated to provide for efficient use. On-street parking to be provided within discrete parking bays on the main routes. Visitor parking should be served by unallocated parking including on-street provision. For developments where at least 50% of the parking provision is unallocated no additional provision needs to be made for visitor parking”.

**Action:** Remove GBC SCC parking quota’s to avoid confusion

**Recommendation:**

3.20 - Policy T1 has been amended to Minimum. Note: The Policy is Not Duplication of either Surrey Guidance or the out of Data Guildford Standard

3.21 We thank MGH for the comment, we remain satisfied with our policy wording.

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**Comment Number 125**

**From** Martin Grant

**Statement** 3.22 With regard to cycle storage, which draft Policy T1 also seeks to govern, MGH considers the Burpham parking standards to be overtly onerous and recommends that these are amended as follows:

- Studio and 1 bed units - 1 cycle space;
- 2, 3 and 3 + (flats and houses) – 2 cycle spaces.

3.23 MGH also recommends that consideration is given, within Policy T1, to long term cycle parking which should be provided by a secure structure within the curtilage of the property. Acceptable examples would include a garden shed, bespoke cycle store or a space within a garage that is not required for car parking. Garage sizes should be a minimum of 6m by 3m internally and where the garage could be used for cycle storage as well as car storage the overall dimensions should be increased to 7m by 3m.

**Action:**

**Recommendation:**

Following consultations with Insurance companies 'secure bike storage' is a requirement of some insurance policies - we are therefore content with this policy

3.23 - We note the contradiction with 3.22

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**Comment Number 144**

**From** Andrew White

**Statement** Parking spaces also need to be large enough for current vehicle sizes. Most garages already provided in Burpham are too small for current vehicles which are significantly larger.

**Action:**

**Recommendation:** Noted

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**Comment Number 151**

**From** Susan Wong

**Statement** The shops in Kingfisher Parade are an important facility and help to provide a community identity. The parking area has been improved very well but even now it is not always possible to park there and sometimes I have to return at a different time or go elsewhere. Cars will always be with us and it is essential that we provide adequate parking with new housing and with new facilities. The infrastructure must also be improved when providing additional housing and facilities.

**Action:**

**Recommendation:** Noted

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**Comment Number 152**

**From** Mike Piper

**Statement** The Plan seeks to reduce car parking provision to very low levels. It is grossly unfair to penalise the Tax Paying Motorist for the benefit of the essentially free loading cyclist.
Action: Recommendation: Noted

Comment Number 153
From Mike Piper
Statement Clearly it is good to encourage cyclists but if they are to become priority road users and motorists are to be harried at every turn by smaller and smaller parking bays, speed cameras with more focus on income than safety etc., Then Cyclists must be made to contribute a reasonable portion of the cost. After all I have been paying for the roads for half a century and yet I am regularly told that I cannot use them because the cyclists are holding an event. If this were attempted by a private company or individual he or they would be prosecuted for fraud, or extracting money by false pretences.

Action: Recommendation: Noted - Proposal outside control of Neighbourhood Plan

Comment Number 162
From John Lobley
Statement I agree with this policy as it sets out sensible parking requirements for the properties listed

Action: Recommendation: Noted

Comment Number 193
From Worplesdon Parish Council - Gaynor white
Statement Policy T1 – Parking:
Whilst we support the proposal to encourage cycling we do not believe that the number of parking places being suggested for new homes is adequate and there will still be problems with visitor and delivery parking. Studio units can accommodate couples, therefore, additional cycle spaces should be provided not only for units which couples inhabit but also for visiting cyclists.

We note that the NP states that major new development will not be permitted where it interrupts established or proposed cycle routes. Is this lawful?

Page 15 – Supporting text That the number of new homes per hectare should be reduced from 40 to 35 per hectare in Burpham. Burpham is not a special case and should be treated the same as other areas within the Borough.

We note that Burpham has on several occasion throughout the document been referred to as a village. We do not believe that Burpham is, or has ever been, a village.

Action: Recommendation: Actually ‘11 villagers’ were present in the Dooms day book of 1066 thus was clearly a village at this time. As this is an ancient designation it must stand the strength of time.

Actually Burpham can specify housing density to maintain character as NPPF Para???

Comment Number 194
From Anthony Teal
Statement The Burpham standards that are proposed appear to be more realistic and pragmatic with cycle spaces sensibly taken into account

Action: Recommendation: Noted

Comment Number 204
From GBC
Statement T 1: Parking Standards
3.28 It is not clear how the figures for minimum parking standards have been arrived at. This needs some supporting text setting this out.
3.29 The text does not make it clear that the Surrey County Council standards are maximum standards, while the Burpham Neighbourhood Plan standard is a minimum standard. This could be misleading.

3.30 The parking standards for dwelling houses outside of Guildford town centre, as set by the Guildford Development Framework Vehicle Parking Standards Supplementary Planning Document (SPD) (Guildford Borough Council, September 2006), apply to both flats and houses. The table presented in the draft Burpham Neighbourhood Plan implies that Guildford Borough Council does not have parking standards for houses. Can this be made clearer?

3.31 The supporting note makes reference to car usage in Guildford borough and surrounds being high, based on the 2011 census. This data should be included to support this contention and evidence the policy. This data could sit in an appendix.

3.32 The supporting text needs to explain and justify why Burpham warrants a different parking standard. Note 2 states ‘Parking standards are designed to prevent on-street parking which has proved unsustainable in Burpham’. This contention needs to be supported.

**Action:** Recommendation: 3.28 - Common Sense plus actual car ownership levels and 2011 Census data.
3.29 - Noted: Amended
3.30 - Noted: Amended to whole numbers to avoid confusion
3.31 - Noted
3.32 - Supported by GBC Infrastructure Base line document 20/09/13 para 2.2.17 - 2.2.20

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**B-T 2f: Foot paths**

Specific permission for upgrade of foot to joint foot cycle paths Permission will not be granted; that would prejudice established or proposed pedestrian routes or pedestrian priority schemes. The provision of foot paths and cycle paths and Joint cycle foot ways will be strongly encouraged as part of all new developments such that they are separate from road space for motor vehicles whenever possible. Guildford Borough Council and Surrey County Council are encouraged to request from the developer an appropriate financial contribution towards the provision of such infrastructure through S106/CIL mechanisms where the planning merits justify such provision.

**Comment Number 59**
From  Liz Hyland

**Statement** Agree

**Action:** Recommendation: Noted

**Comment Number 88**
From  Angelina Taylor

**Statement** As long as it is deemed safe to do so the joint cycle foot path could contribute significantly the overall easing of congestion on the roads. 1. Because people would be encouraged to use because they are safe. 2. If more people felt safe cycling more people would cycle, reducing the numbers of cars on the roads

**Action:** Recommendation: Noted

**Comment Number 164**
From  John Lobley

**Statement** I agree with this policy as the safety of pedestrians must be considered paramount

**Action:** Recommendation: Noted
Comment Number 189
From Anthony Teal
Statement Strongly supported, see comments relating to cycling provision
Action: Recommendation: Noted

Comment Number 205
From GBC
Statement 3.33 Policy T2F states ‘Specific permission for upgrade of foot to joint foot / cycle paths will not be granted; if that would prejudice established or proposed pedestrian routes or pedestrian priority schemes.’ Surrey County Council, the Local Highway Authority, does not require planning permission to undertake schemes within the limits of highway land. This would more properly sit as an aspiration in the ‘Aspirational policies’ section or as part of a vision.

3.34 This policy needs some additional supporting text and commentary. The supporting text references the survey but doesn’t state which part of the survey. The survey is a large document so it should give a more precise reference.
3.35 The policy is seeking planning obligations for infrastructure. It should make it clear that contributions will only be sought where consistent with NPPF paragraph 204 and the CIL
Action: Recommendation: 3.33 - Addressed in MGH comments
3.34 - Noted
3.35 - Noted

Comment Number 224
From GBC
Statement Neighbourhood Plan Appendix 1: Burpham Neighbourhood Plan Area and Foot / Cycle paths map
4.1 The text in the title page states ‘Note: All maps within this Neighbourhood plan plan [sic] originate from... the ordnance Survey licence system held by Guildford Borough Council’. This note contradicts a similar note in Appendix 9 that states ‘Note: All maps within this Neighbourhood plan plan [sic] originate from... the ordnance Survey licence system held by Guildford Borough Council or Surrey County Council’.
4.2 The maps on page 3 and 4 need to have licence numbers attached, as the map on page 2 has done. When this is done, the note on the title page will not be needed.
4.3 The lines on the large cycle map (page 4) are not very clear. We suggest the lines are made thicker so the colours are more visible and that the map includes a key.
Action: Recommendation: 4.1 - Noted - Titles amended
4.2 - Noted - amended
4.3 - Noted - amended

Comment Number 248
From Martin Grant
Statement 3.26 MGH objects to draft Policy T2f where it restricts development which would upgrade footpaths to joint footpaths/cycle paths. The draft Policy is overly restrictive and there is no justification to support such a policy aspiration.
Action: Recommendation: 3.26 - Amend Policy

B-T 2c: Cycle routes
Comment Number 28
The Proposals Map shows [see appendix A] specific routes along which the plan encourages cycling, including improvements to the safety and convenience of the routes, the designation of cycle lanes, sign posting, and the provision of cycle parking facilities. Major travel generating development, including residential developments, will be expected to make provision for cyclists and link with existing and planned routes. All new developments will be expected to make provision for cycle parking in accordance with the standards set out in this plan. Major new development will not be permitted where it interrupts established or proposed cycle routes unless suitable mitigation and alternative provision is provided.

From DR
Statement Policies 2a, T2b and T2c
The above policies are not land use planning policies and should be moved into a different section of the plan as they deal with wider aspirational issues.
Action: Recommendation: Not a requirement in Neighbourhood plans

Comment Number 29
From GBC
Statement Policy T3: Footpaths and Cycle Paths
This is a land use planning policy but wording and criteria needs to be tightened up. It is not clear how and when the policy should be applied in any given circumstance.
Action: Recommendation: Noted

Comment Number 106
From Robert Hanford
Statement I could not find Appendix 1 online so apologies if these comments cover what is already in the plan. There are two off road cycle/footpath routes that should be improved for the benefit of Burpham residents. One this side of the A3 from off Burpham Lane to Spectrum and the other following the tow path to the town centre. Both need work done outside of Burpham if Burpham residents are to be able to benefit. The path to Spectrum deteriorates along the back of Abbotswood. The towpath route to be a practical route needs an effective crossing of the Woking Road and also Woodbridge Road by B&Q. Is the neighbourhood plan restricted to comments within Burpham or can it encourage work outside the Parish to improve the lot of the residents within the Parish?
Action: Recommendation: Noted - Comments also refer to Outside plan area

Comment Number 126
From Martin Grant
Statement Draft Policy T2c: Cycle Routes
3.24 The above draft Policy requires major trip-generating developments to “...make provision for cyclists and link with existing and planned routes”. Policy T2c is restrictive of major development which “...interrupts established or proposed cycle routes”.

3.25 MGH objects to draft Policy T2c in its current form, finding this to be unduly onerous, restrictive and not ‘positively worded’. The draft policy is inflexible in so far as it fails to take into account those instances where the removal of pedestrian / cycle facilities are required for vehicle / bus measures for example and as such, MGH recommends the insertion of a new clause within draft Policy T2c as shown underlined below:
“Major new development will not be permitted where it interrupts established or proposed cycle routes unless suitable mitigation and alternative provision is provided.”
**Action:** Recommendation: 3.24 - Noted
3.25 - Amend Policy to suggested wording

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**Comment Number 163**
**From** John Lobley
**Statement** I agree with this policy as alternative methods of transport to the motor car must be encouraged as much as possible

**Action:** Recommendation: Noted

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**Comment Number 185**
**From** Anthony Teal
**Statement** The current cycle lanes around Burpham are a real danger to both cyclists and pedestrians. There needs to be as much physical separation of bicycles lanes from vehicles on the roads as possible and effective signposting is essential. Pedestrians can be caught unawares by cyclists on shared pavements and the situation at the moment serves nobody effectively.
I would support these guidelines to improve cycling infrastructure.

**Action:** Recommendation: Noted

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**B-Fd 7 Dwelling density and land use**

**Comment Number 81**

| Dwelling density will be based on plot size. |
| Housing: The footprint of each new house /dwelling must not exceed 33% of its allocated plot size. |
| Flats: Must have access to private open space which has a minimum space equivalent to twice the External floor area of each flat. |
| Within the elements of the 'private land to include Parking, Cycle Storage and recycling storage location (unless central recycling is provided) a reduction of 3msq will be permitted for each flat. |
| Sheltered and assisted dwellings: Shall have the equivalent ratio of communal open space. |

**From** Angelina Taylor
**Statement** I agree with this strategy.

**Action:** Recommendation: Noted

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**Comment Number 264**
**From** GBC
**Statement** 3.70 The first sentence states that dwelling density will be based on plot size. This needs some explanation as it is not clear what this means.
3.71 This policy needs some supporting text and commentary and will need to be supported by a robust planning justification if it is to be enforced during planning applications and defended at appeal. Generally, it is too prescriptive for planning policy. The aims of the policy are not clear.
3.72 The policy states that the footprint of new dwellings must not exceed 30 per cent of the plot size. There is no explanation as to why this figure has been chosen or how this particular figure has been reached and generally such a policy would be considered too prescriptive. There needs to be robust support for such a policy in the supporting text as it is likely to be challenged.
3.73 This policy appears to contradict policy EN 2 which allows dwellings to occupy up to 33 per cent of the plot size.
3.74 In some parts of Burpham (for example, the 1980s estate in the north west corner of the neighbourhood area) existing dwellings exceed this ration. Requiring new dwellings in
this area to be built at a maximum of 30 per cent of the plot size would not be in keeping with the existing character. This conflicts with policy FD 1.

3.75 The policy states that ‘Flats must have access to private open space, which has a minimum space equivalent to twice the floor area of each flat’. It is not clear whether this refers to external or internal floor space.

3.76 The policy relating to flats could result in them being surrounded by large areas of open space; for example a development of ten two-bedroom flats, each with an internal floor area of 75 metres, would require an open space requirement on 1500 square meters. This an inefficient and therefore unsustainable use of space and therefore does not comply with basic condition 2. This policy is unlikely to be deliverable and therefore does not meet basic condition 1.

3.77 We recommend this policy is rewritten to be less prescriptive. If the intention of the policy is to prevent back garden developments, or deliver dwellings with larger gardens, perhaps the policy wording could reflect this (as long as the policy meets basic conditions 1 and 2).

Action: Recommendation: 3.70 - Noted amended to add ‘its own plot’

3.71 - Noted
3.72 - Noted - amended to 33%
3.73 - Noted
3.74 - Noted - This Policy is to prevent further over crowding in the plan area which has occurred in Raynham Close.
3.75 - Noted Internal dimensions
3.76 - Within the elements of the ‘private land to include - Storage recycling bins Cycle Storage, Car parking for Occupiers and Visitors
3.77 - Noted

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Comment Number 133
From Martin Grant

Statement Draft Policy FD7: Dwelling Density and Land-Use

3.48 The above draft Policy requires the footprint of each new house / dwelling to not exceed 30% of its plot size and requires flats to have access to private open space which has a minimum space equivalent to twice its floor area.

3.49 MGH objects to the draft Policy, finding it to be unduly restrictive in nature and having the potential to conflict with established design guidelines, namely the Urban Design Compendium and Building for Life 12. The draft Policy is also deemed preventative when having regard to the NPPF at paragraph 58 where it requires applicants to “… plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes”.

3.50 Draft Policy FD7, in its current form, does not give consideration to the variety of characteristics found across a site and should be more prescriptively written in terms of density rather than plot ratio. This is set out in the Guildford Residential Design Guide SPD where it states “...new residential development should be at a density of between 30 to 50 dwellings per hectare net. Densities above this range will be permitted in locations with good public transport accessibility” (Para 5.5 of GBC Residential Design Guide SPD).

3.51 MGH recommends that rewording of draft Policy FD7 so that it permits a range of densities, in lieu of any reference to plot ratio, thereby remaining compliant with GBC’s
requirements for density, housing tenure, type and size, and would suggest an average density of between 25 and 50 dph for Burpham. This would also ensure the policy is aligned to Building for Life principles (no. 4) which establishes the need for ‘meeting local housing requirements and that the developer should consider how to incorporate a range of property sizes and types on larger developments’ (BFL Para 5).

3.52 As set out above in response to draft policy FD7, MGHs’ proposals for Gosden Hill will deliver a variety of housing types set within a range of plot sizes created in order to meet market needs and in turn GBC’s housing requirement. By limiting the plot ratio this will narrow market possibility and not allow for the potential to establish a diverse community.

3.53 MGH also finds draft Policy FD7, where it relates to private open space for flatted development, to be over prescribed. Flatted development will require an area of private amenity space which, depending on their design, should be achieved by ‘considering the potential to benefit from solar gain through the buildings orientation and design where this can be achieved without compromising good urban design...’(BFL sec 6 Para. 8). No quantum has been outlined across GBC’s Local Plan or supplementary documents and therefore MGH recommends that this is evaluated on a case by case basis by the determining authority.

Action: Recommendation: 3.48 - Noted
3.49 - Noted
3.50 - Noted
3.51 - Noted
3.52 - Noted
3.53 - Noted

B-AT 1: Improvements to public transport

Comment Number 50
From  Liz Hyland
Statement  Agree
Action: Recommendation:  Noted

Physical improvements to the road and pavement layouts that provide enhanced public transport opportunities will be supported in principle. Improvements to reliability of services to central Guildford and routes to where people want to travel are strongly supported by residents, these routes being Guildford Royal Surrey Hospital, the main line railway station, Woking and London.
Statement I strongly support public transport into the routes mentioned.
Action: Place in supporting comments
Recommendation: Noted

Comment Number 135
From Martin Grant
Statement Draft Policy AT1: Improvements to Public Transport
3.56 The above draft ‘inspirational’ policy supports physical improvements to the road and pavement layouts that provide enhanced public transport opportunities. It also supports improvements to the “...reliability of bus services to central Guildford and routes to 'where people want to travel’”, the latter comprising Guildford Royal Surrey Hospital, the main line railway station, Guildford Town Centre, Woking and London.
3.57 As set out above in response to Policy FD1, MGHs’ proposals for Gosden Hill will deliver a range of public transport improvements which fulfil the overarching inspirational objective of draft Policy AT1 and on this basis, makes no objection to its inclusion within the draft NP.
Action: Place in supporting comments
Recommendation: 3.56 - Noted 3.57 - Noted

Comment Number 176
From John Lobley
Statement I agree with this sensible policy
Action: Recommendation: Noted

Comment Number 215
From GBC
Statement 3.92 This policy needs some supporting text. This is not a land use policy. We assume this is part of a vision, or ‘would like to see’ list. This needs to be explained in the document.
3.93 We note that traffic issues have been highlighted in the neighbourhood survey. This could be used to support this policy.
Action: Note survey results
Recommendation: 3.92 - Noted 3.93 - Noted

B-AT 3: The Railway
The plan will support a railway station "at the site of the current Surrey Merrow Depot".

Comment Number 16
From SCC
Statement Policy AT3 – The Railway
The policy states that the plan will support an assessment of the viability of a new railway station at Merrow. This accords with the Surrey Rail Strategy. Appendix B could include a reference to the Surrey Rail Strategy.
Action: added to supporting text
Recommendation: Noted

Comment Number 44
From David Howells
Statement Now AT 2
Whilst I agree with the merits of rail travel, I am concerned at the somewhat unconditional support for a railway station without recognising that this will attract extra vehicular traffic along surrounding roads and the need for adequate car parking/cycle facilities at the station. The station might be used for daily commuting up to London or into Guildford as well as shopping trips into town.

**Action:** Recommendation: Noted

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**Comment Number 49**
From Liz Hyland

**Statement** Now AT 2: Could be a good idea but how do South West Trains feel about this?

**Action:** Recommendation: Noted

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**Comment Number 76**
From Angelina Taylor

**Statement** Now AT 2: I would support a Railway Station in the area

**Action:** Place in supporting policies

**Recommendation:** Noted

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**Comment Number 109**
From Robert Hanford

**Statement** Now AT 2: It is now acceptable to run light and heavy rail vehicles on the same track. With Oyster card type fare collection minimising the need for station facilities it could be beneficial to see a light rail effingham Junction to Guildford shuttle serving small minimal stops in places where a full length platform would not be practical. For example at Merrow Lane rail bridge and George Abbot school. The service to complement the existing heavy rail service. Will it happen? Who knows if the initial funding would ever be made available. I am not even sure if there would be the demand to support the service. In a perfect world there would be such a service continuing to the University, Hospital and Science Park. Would there be any value adding to the plan a generic sentence stating "Support is given to maximise the use of the existing rail infrastructure where technology permits the introduction of light rail frequent stop solutions to complement the existing services"?

**Action:** Recommendation: Noted

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**Comment Number 136**
From Martin Grant

**Statement** Draft Policy AT2: The Railway

3.58 The above draft, inspirational Policy supports a new railway station on the site of the current Surrey Merrow depot.

3.59 MGH objects to draft Policy AT2 in its current form given it fails to take into consideration the location of the proposed Merrow station on both GBC and MGH owned land, and its association with MGH’s proposals for Gosden Hill which will not only facilitate its delivery, but act as a catalyst for the wider regeneration of the GBC owned Merrow depot to the south.

3.60 MGH also objects to ‘note 2’ which forms part of the explanatory text to draft Policy AT2 and which finds delivery of the Merrow train station “...unlikely in the lifetime of the Plan, as scheduling implications are considerable”. Merrow Rail Station has been identified by SCC as a medium term to be delivered within the next franchise agreement 2019-2024,
i.e. Within the lifetime of the Plan, and MGH therefore requests that ‘note 2’ to draft Policy AT2 is amended accordingly on this basis.

**Action:** Recommendation: 3.58 - Noted
3.59 - Noted outside plan area
3.60 - Noted Amended reference to GBC feedback

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**Comment Number** 146
**From** Andrew White
**Statement** Now AT 2:
I AM STRONGLY AGAINST THIS POLICY FOR WHICH THERE IS NO JUSTIFICATION. IT WILL ADD TO TRAFFIC AND PARKING PROBLEMS WHILST PROVIDING LITTLE BENEFIT.

**Action:** Place in objections to policy
**Recommendation:** Noted

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**Comment Number** 177
**From** John Lobley
**Statement** Now AT 2:
I agree with this policy as the Merrow station will ease congestion in the Town centre and provide a transport alternative

**Action:** Move to supporting comments
**Recommendation:** Noted

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**Comment Number** 216
**From** GBC
**Statement** now AT 2:
3.94  This policy needs some additional supporting text. This is not a land use policy. We assume this is part of a vision, or ‘would like to see’ list. This needs to be explained in the document.

**Action:** Recommendation: 3.94 - Noted

**B-AT 4: Vehicle Parking Facilities Improvements**

All new developments within Burpham Ward; shall provide parking within its designated land boundaries or nearby 'off the public highway' to meet the expected capacity of the development, without requiring the use of public roads and access points as overflow parking. As appropriate, parking shall meet policy T1.

**Comment Number** 75
**From** Angelina Taylor
**Statement** Now AT 3:
I would agree that this is a sensible strategy

**Action:** Move to supporting comments
**Recommendation:** Noted

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**Comment Number** 148
**From** Andrew White
**Statement** Car parking and garages must be of sufficient size to accommodate the size of modern vehicles such as Range Rovers, estate cars and MPV’s.

**Action:** Amend supporting text
**Recommendation:** Noted

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Comment Number 178  
From John Lobley  
Statement Now AT 3  
I agree with this sensible policy  
Action: move to supporting comments  
Recommendation: Noted  

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Comment Number 195  
From Anthony Teal  
Statement Now AT 3:  
An essential requirement, with the caveat \'to meet the expected capacity\' seriously analysed. Overflow parking in existing public roads is a real problem that must be curtailed otherwise all manner of traffic problems ensue.  
Action: Move to supporting text  
Recommendation: Noted  

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Comment Number 217  
From GBC  
Statement Now AT3  
3.95 This policy needs some supporting text. This is not a land use policy. We assume this is part of a vision, or \'would like to see\' list. This needs to be explained in the document.  
3.96 This policy requires all development to provide on-site parking. Policy T1 gives a preference for on-site parking, so there is a conflict between these policies. It is not realistic to aim for all new developments to provide on-site parking, and it may not always be desirable in all locations. We suggest such a policy should be applied to specific areas where it can be demonstrated that the problems of street parking are acute.  
Action: Recommendation: 3.95 - Noted  
3.96 - Noted amend T1 development must meet standards below. The preferences for assigned parking places within the curtilge  

B-AT 4a: George Abbott School  
Provision for all day parking by staff and pupils at the George Abbott school is strongly supported. Onsite parking should be provided and drop off and pickup zones should be away from the School entrance to avoid congestion.  

Comment Number 48  
From Liz Hyland  
Statement All children within a certain distance should be encouraged to walk to school this policy should be adopted and promoted by the school  
Action: add to supporting comments  
Recommendation: Noted  

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Comment Number 147  
From Andrew White  
Statement I strongly support this policy.  
Action: move to supporting comments  
Recommendation: Noted  

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Comment Number 179  
From John Lobley  
Statement I agree with this policy
Action: apply to supporting comments  
Recommendation: Noted  
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Comment Number 218  
From GBC  
Statement 3.97 This policy needs some additional supporting text. This is not a land use policy. We assume this is part of a vision, or ‘would like to see’ list. This needs to be explained in the document.  
3.98 Note 1 states that residents have expressed concern over parking at Woodruff Avenue as evidence in support of the policy. We note this evidence is recorded in the neighbourhood survey. This evidence should be clearly referenced in the supporting text.  
Action: Reference Survey data  
Recommendation: 3.97 - Noted  
3.98 - amend Text  - See Survey Results  

B-AT 4c: Burpham Lane

The introduction of parking restrictions on this, the oldest road of Burpham, is strongly supported. Increased on road parking in Burpham Lane is an existing and increasing problem.  

Comment Number 46  
From Liz Hyland  
Statement The problems here are only going to be enhanced by the Aldi store realistic restrictions must be introduced.  
Action: move to supporting comments  
Recommendation: Noted  
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Comment Number 69  
From Mark Fraser  
Statement Yes parking is an issue along the whole length of Burpham Lane, but especially at school picking up and dropping off time as parents park with total inconsideration for other road users or the safety of their own children! But any parking restrictions on Burpham lane will impact on other roads in the area, especially Marlyns Drive. Parking in Marlyns Drive is already becoming an issue. The construction of a new dwelling without planning permission in the garden of 7 Meadow road with access to Marlyns Drive is turning Marlyns Drive into a slalom around parked vehicles!! Any parking restrictions need to consider all local roads and not just transfer the problem!!  
Action: Move to supporting comments  
Recommendation: Noted  
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Comment Number 73  
From Angelina Taylor  
Statement I would support realistic parking restrictions  
Action: Move to supporting comments  
Recommendation: Noted  
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Comment Number 149  
From Andrew White  
Statement This needs to take account of the impact of the Aldi development and ensure residents are not inappropriately affected  
Action: Recommendation: Noted
Comment Number 181
Title 71  B-AT 4c: Burpham Lane
The introduction of parking restrictions on this, the oldest road of Burpham, is strongly supported. Increased on road parking in Burpham Lane is an existing and increasing problem.
From John Lobley
Statement I agree with this policy
Action: Recommendation: Noted

Comment Number 220
Title 71  B-AT 4c: Burpham Lane
The introduction of parking restrictions on this, the oldest road of Burpham, is strongly supported. Increased on road parking in Burpham Lane is an existing and increasing problem.
From GBC
Statement AT 4c: Burpham Lane
3.102 This policy needs some supporting text. This is not a land use policy. We assume this is part of a vision, or ‘would like to see’ list. This needs to be explained in the document.
3.103 Some of the text in the policy sounds like supporting text. Can this be removed from the policy box to the supporting text to make it clear to the reader which is supporting text and which is policy?
3.104 The policy states that ‘Current road parking in Burpham Lane is an existing and increasing problem.’ This needs to be evidenced. Has this come from the neighbourhood survey? If so, this needs to be referenced.
3.105 The policy calls for ‘Realistic parking restrictions’. This needs some explanation.
Action: Recommendation: 3.102 - Noted - remove 'Realistic'
3.103 - Noted - Move to Supporting Text
3.104 - Noted - Bus Route changed and Local Committee refering to Aldi Plan requireing extra parking control plus additional places at Burpham Primary School Plus Local Survey
3.105 - Noted and Expanded

Comment Number 47
Title 33  B-AT 4b: London Road Parade and Kingpost Parade
The London Road Parade & Kingpost Parade parking has been improved by the new layout but all day parking is still causing problems for drivers wishing to stop to use the shops and trade is being lost to other areas. A one or two hour free stay limit during the day is strongly supported – having regard to the requirements of residents of the flats above.
From Liz Hyland
Statement Agree parking is still an issue and there are frequently no free spaces.
Action: move to supporting comments
Recommendation: Noted

Comment Number 74
Title 33  B-AT 4b: London Road Parade and Kingpost Parade
The London Road Parade & Kingpost Parade parking has been improved by the new layout but all day parking is still causing problems for drivers wishing to stop to use the shops and trade is being lost to other areas. A one or two hour free stay limit during the day is strongly supported – having regard to the requirements of residents of the flats above.
From Angelina Taylor
**Statement** I would support a two hour time limit this allows for use of the restaurant

**Action:** add to supporting comments

**Recommendation:** Noted

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**Comment Number 110**

**Title** 33  B-AT 4b: London Road Parade and Kingpost Parade

The London Road Parade & Kingpost Parade parking has been improved by the new layout but all day parking is still causing problems for drivers wishing to stop to use the shops and trade is being lost to other areas. A one or two hour free stay limit during the day is strongly supported – having regard to the requirements of residents of the flats above.

**From** Robert Hanford

**Statement** My comments at FD3 about managing the parking here and on the Aldi site apply. You mention a one or two hour free period. This may be insufficient for the customers of Italian Inspirations if the time my wife spends in there is any indication. As well as mentioning with regard to the needs of the residents of the local flats, please can this be extended to read "having regard to the needs of residents of the flats above and individual businesses".

**Action:** Recommendation: Noted

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**Comment Number 180**

**Title** 33  B-AT 4b: London Road Parade and Kingpost Parade

The London Road Parade & Kingpost Parade parking has been improved by the new layout but all day parking is still causing problems for drivers wishing to stop to use the shops and trade is being lost to other areas. A one or two hour free stay limit during the day is strongly supported – having regard to the requirements of residents of the flats above.

**From** John Lobley

**Statement** I agree with this policy

**Action:** move to supporting comments

**Recommendation:** Noted

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**Comment Number 219**

**Title** 33  B-AT 4b: London Road Parade and Kingpost Parade

The London Road Parade & Kingpost Parade parking has been improved by the new layout but all day parking is still causing problems for drivers wishing to stop to use the shops and trade is being lost to other areas. A one or two hour free stay limit during the day is strongly supported – having regard to the requirements of residents of the flats above.

**From** GBC

**Statement** 3.99 This policy needs some supporting text. This is not a land use policy. We assume this is part of a vision, or ‘would like to see’ list. This needs to be explained in the document.

3.100 Some of the text in the policy sounds like supporting text. Can this be removed from the policy box to the supporting text to make it clear to the reader which is supporting text and which is policy?

3.101 The policy states that trade is being lost to other areas. Can evidence be presented that supports this view? If it can be evidenced, it should be removed to the justification in the supporting text.

**Action:** Recommendation: 3.99 - Noted

3.100 - Noted

3.101 - Noted

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**Comment Number 36**
Title 63 B-EMP 2: Shopping Parades
The loss of any ‘A’ class use or D1 & D2 use on the ground floor of the Kingpost and London Road Parades will be strongly resisted. Proposals for alternative uses will be expected to be accompanied by marketing information to demonstrate that the premises have been marketed for A1 -A5 use or D1 & D2 use for 18 months prior to application. London Road and Kingpost Parades conform to the definition of “Local Shopping Parades” serving only the local area. With many trips made on foot as these Parades suffer severe parking problems. These are small clusters of a few shops, often including only very local level services such as, newsagent, small food store, café / hot food takeaway, launderette.
Kingpost and London Road Parades are continuing to play an important role in the retail hierarchy, particularly in terms of serving localised community needs. There is an underlying recognition that these neighbourhood parades provide essential opportunities for day-to-day convenience shopping and service access and make an important contribution to maintaining ‘sustainable communities’. They provide accessible shopping facilities for local residents and in particular the elderly, disadvantaged and less mobile groups in the community, who may be less able to take advantage of the bulk shopping focus of major supermarkets.
Outside the shopping parades, Sainsbury’s Supermarket is a major supplier of foodstuffs to the community and surrounding. This policy supports future A1 development on this site on the condition that any future development complies with parking requirements, visual height restrictions of the surrounding tree screens and due regard to trading impacts on the Parades.

From Woodland Trust
Statement Many thanks for giving the Woodland Trust the opportunity to contribute to your Neighbourhood Plan. We warmly welcome Burpham’s draft neighbourhood plan and we are very supportive of the policies within it. We just have a couple points to make that may help strengthen it.
The policies with the plan to protect the existing green spaces, particularly the ancient woodland at Merrow Common are to be welcomed, however we believe it misses the opportunity to plan for the proactively for woods and trees in the parish. EMP2 – Shopping Parades is the only policy that appears to proactively support tree planting and then it is only as ‘tree screens’. This policy has more scope to be specific regarding planting numbers, for example other plans have requested a certain number of trees for each car parking space within shopping developments. We would like to see the plan take the opportunity to consider succession planting, not only protecting existing trees but planning for their successors particularly with regard to new housing developments, street trees and small wooded areas can make a very positive contribution to the visual amenity of an area and can also help build up climate resilience with regard to flooding prevent, shading etc.
https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/
Action: Noted: amendment received from Woodland Trust ID 257
Recommendation: Consider adding supporting text to other policies.

B-C 1: Enhancing Community Facilities

Support will be given in principle for additional community facilities in Burpham (D Class - where D means Assembly and leisure uses)
Support will be given for proposals that enable school premises to be made available as community facilities during ‘non-teaching’ periods with the consent of the school’s staff and governors. Change of use for non-commercial community activities will be supported for halls and outside areas such as football pitches and tennis courts.
There is lack of daytime/evening central community facilities within Burpham village. Proposals to improve community function buildings in central locations will be supported.

Comment Number 30
From  GBC
Statement  C1 Enhancing Community Facilities
Action:  Recommendation:  Noted

Comment Number 41
From  Gillian Gibbs
Statement  I would like to see a community centre in Burpham which could cater for all especially elderly frail persons. I know several residents that have had strokes and other disabling illnesses. The nearest centre to cater for them is in Park Barn. I do not want to undertake this journey across town so I go to Moorcroft Community centre in Westfield, Woking. For £8 a year I can have reasonable priced haircut, midday meal, various fitness activities etc. The list is endless. We must consider the generation that will be old and lonely.
Action:  move to supporting comments
Recommendation:  Noted

Comment Number 58
From  Liz Hyland
Statement  Strongly Agree
Action:  move to supporting comments
Recommendation:  Noted

Comment Number 89
From  Angelina Taylor
Statement  This is long over due if more community based activities were held locally the need to travel into Guildford centre would be minimised
Action:  move to supporting comments
Recommendation:  Noted

Comment Number 114
From  Robert Hanford
Statement  The potential development of Gosden Hill for housing is mentioned in a few places. I guess it will eventually happen. Is there any value in suggesting the Parish Boundary is extended, if necessary, to include all development on that site. This seems preferable to having the site split across two Parishes and permit more focused comment on any development plans. Can suggested movement of the Parish boundary be included in a Neighbourhood Plan?
Action:  Recommendation:  Pass to the boundary commission for comment under separate discussion of would it improve or destroy benefits / circumstances of the community

Comment Number 127
From  Martin Grant
Statement  Draft Policy C1: Enhancing Community Facilities
3.27 The above Policy is supportive of additional community facilities in Burpham with the exception of casinos.
3.28 MGH has no objection to draft Policy C1 in its current form and wishes to highlight that the proposals for Gosden Hill will include a new local centre, thereby delivering new
community facilities in line with the NF’s aspirations. It should also be borne in mind that a new Local Centre at Gosden Hill is afforded policy support within the emerging Guildford Local Plan.

3.29 At this stage, MGH envisages a new local centre as Gosden Hill to accommodate:
• A primary school (size to be confirmed);
• A GP surgery;
• A village green;
• Small-scale village shops and cafes providing local retail opportunities; and
• Community rooms available for hire.

Action: Recommendation: 3.27 - Noted
3.28 - Noted
3.29 - While a GP Surgery and 'Community rooms?' would be greatly appreciated within the current development boundary of Burpham ward - They hold no relevance outside the community limits, As this would not provide improvement to the current situation of the requirement to leave the community to access these facilities.

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Comment Number 165
From John Lobley
Statement I agree with this policy as community facilities are an essential part of a neighbourhood
Action: move to supporting comments
Recommendation: Noted
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Comment Number 206
From GBC
Statement 3.36 The policy, as written, is vague and contains some ambiguity. Community uses are conventionally regarded as those within use Class D1 (non-residential institutions) and Class C2 (residential institutions). The policy aims to encourage D1 and D2 (Assembly and leisure) uses. Can the wording avoid the phrase ‘community facilities’ to make it clearer that only these two use classes are supported? Casinos fall under the Sui Generis use class so do not need to be added to the policy as an exception.
3.37 If the prohibition on casinos remains, some explanation needs to be given as to how this decision has been made. This needs to be explained and evidenced in the supporting text. There would appear to be no national or local policy background for a blanket ban on casinos.
3.38 The policy or supporting text needs to define ‘Central locations’.
Action: Recommendation: 3.36 - Noted Definition vairable across the country - amendedto read "D" class where "D" class means ....
3.37 - Remove reference to Casio
3.38 - Noted Policy amended

B-ASE 1: Provision of Schools.
The principle of additional school places, whether through extending existing school facilities or the provision of a new school, is supported in principle subject to compliance with other policies in this plan.

Comment Number 17
From SCC
Statement Policy ASE1 - Provision of Schools
Schools within Surrey are arranged in planning areas and school places are planned on this basis rather than by individual schools. It is Surrey County Council policy to provide local
schools for local children, although parents/carers can exercise their right to apply for schools that are not the nearest to their home. Burpham forms part of the 'North East Guildford' primary planning area and the main 'Guildford' secondary planning area. Both of these planning areas incorporate schools in a wider area than Burpham alone.

The School Commissioning Team at Surrey County Council works closely with each of the district and borough councils to ensure that we are aware of planned housing developments in an area so that we can incorporate additional pupils into our pupil forecasting. Demand for primary places from resident children is forecast using data on births in an area. Data on housing completions, housing trajectories and housing supply is obtained from the local planning authorities. The forecast numbers are increased by the projected number of pupils yielded from housing developments. It is assumed that pupils yielded from new housing will require a place in the year following commencement. This allows time for housing to be completed and for housing to be purchased and families to move in.

Section 106 education contributions are requested for the mitigation of the effects of a development. Where housing is on a large scale with several hundred houses, this may involve provision of land and a new school. For smaller scale developments, contributions are calculated based on the likely pupil yield and applied to expansion projects within the vicinity of the development.

**Action:** No action required
**Recommendation:** Noted

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**Comment Number 71**
**From** Angelina Taylor
**Statement** I would support the extension of the current schools if this is possible to accommodate demand.
**Action:** Recommendation: The need for school places means that totally new schools are planned

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**Comment Number 139**
**From** Martin Grant
**Statement** Draft Policy ASE1: Provision of Schools
3.66 The above draft Policy supports the principle of additional school places either through extensions to existing facilities or by delivering new facilities. MGH raises no objection to the draft Policy and in doing so, wishes to highlight that their proposals for Gosden Hill will include the provision of a new primary school on site and contributions towards improved secondary school provision, off-site, to be discussed and agreed with GBC and/or SCC.
**Action:** Recommendation: 3.66 Noted

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**Comment Number 183**
**From** John Lobley
**Statement** I agree with this sensible policy
**Action:** Recommendation: Noted

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**Comment Number 223**
**From** GBC
**Statement** 3.111 This policy needs some supporting text. This is not a land use policy. We assume this is part of a vision, or ‘would like to see’ list. This needs to be explained in the document.
**Action:** Recommendation: 3.111 See SCC Future plans plus Survey Results

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**B-EMP 1: Home Working**

This policy gives support to working from home and will support in principle planning applications that promote this providing all normal development control is satisfied. There are many examples of this practice occurring already, some being part-time. With the ubiquity of high speed broadband, working from home will increase. There are practical benefits to the community; reduced need for traffic; more possibilities of wage-earners collecting children from school some days.

**Comment Number 80**
From  Angelina Taylor
Statement In a work environment of Hyper Mobility is becoming the norm home working is becoming is an important feature of a sustainable environment.
Action: move to supporting text.
Recommendation: Noted

**Comment Number 173**
From  John Lobley
Statement I agree with this sensible policy
Action: Move to supporting comments
Recommendation: Noted

**Comment Number 212**
From  GBC
Statement 3.78 This policy needs some supporting text and commentary. Some of the text in the policy would more properly sit in an introduction or reasoned justification.
3.79 This is generally not a planning issue as working or running a businesses from home often does not require planning permission. However, there may be cases where home working needs to be supported by additional development that could need planning permission. We assume that this policy is therefore supporting this type of development. Perhaps this could be made explicit to avoid ambiguity.
3.80 Further to the above, we suggest this policy may need further thought and some expansion. For example, the impacts of office based home working may be different to the impacts of a home based beautician or shipping company. Are developments associated with all these uses acceptable? If the policy relates only to home based offices, this should be made explicit.
3.81 The text explaining the benefits of home working would be more suitably included in the justification.
Action: Recommendation: Noted

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**B-EMP 2: Shopping Parades**

The loss of any ‘A’ class use or D1 & D2 use on the ground floor of the Kingpost and London Road Parades will be strongly resisted. Proposals for alternative uses will be expected to be accompanied by marketing information to demonstrate that the premises have been marketed for A1 - A5 use or D1 & D2 use for 18 months prior to application. London Road and Kingpost Parades conform to the definition of “Local Shopping Parades” serving only the local area. With many trips made on foot as these Parades suffer severe parking problems. These are small clusters of a few shops, often including only very local level services such as, newsagent, small food store, café / hot food takeaway, launderette.
Kingpost and London Road Parades are continuing to play an important role in the retail hierarchy, particularly in terms of serving localised community needs. There is an underlying recognition that these neighbourhood parades provide essential opportunities for day-to-day convenience shopping and service access and make an important contribution to maintaining ‘sustainable communities’. They provide accessible shopping facilities for local residents and in particular the elderly, disadvantaged and less mobile groups in the community, who may be less able to take advantage of the bulk shopping focus of major supermarkets.

Outside the shopping parades, Sainsbury’s Supermarket is a major supplier of foodstuffs to the community and surrounding. This policy supports future A1 development on this site on the condition that any future development complies with parking requirements, visual height restrictions of the surrounding tree screens and due regard to trading impacts on the Parades.

Comment Number 79
From Angelina Taylor
Statement In an increasing homogonistic shopping environments it is important to have local facilities and essential amenities for the village to access
Action: Move to supporting comments
Recommendation: Noted

Comment Number 174
From John Lobley
Statement I agree with this policy as shopping parades provide a viable alternative to mainstream supermarkets
Action: Move to supporting comments
Recommendation: Noted

Comment Number 213
From GBC
Statement 3.82 This policy needs some additional supporting text and commentary. At present, it is not clear which text in the policy box is policy and which text is commentary. Much of the text in the policy box could be placed in the supporting text.
3.83 The requirement for 18 months marketing for alternative uses prior to making a change of use planning application is unduly onerous and could result in a property standing empty for 18 months. It is not clear how the period of 18 months has been decided. This needs to be set out in the supporting text.
3.84 The policy does not say which uses will be considered acceptable if marketing is carried out for Class A uses, Class D1 or D2 uses, and no offers come forward for that use. Would any alternative use be acceptable? We recommend rewording to include what uses are considered suitable for a shopping area. Additionally, this policy as written could result in every unit becoming a pub, wine bar or takeaway.

3.85 The supporting text makes reference to case studies as supporting evidence. It is not clear what these case studies are as the phrase ‘case studies’ does not appear anywhere else in the document or the appendices. The case studies need to be presented as supporting evidence, or if they have already been presented they need to be clearly marked.
3.86 The last paragraph of the policy is contrary to national policy. The NPPF does not support these out of centre shops for extensions or intensification. We recommend adding supporting text to establish a stronger case for the policy.
Action: Recommendation: 3.82 - Noted
3.83 - Noted the 18 months reflects the importance of the existing Business Units are to the community
3.84 - Noted any Except Betting and Payday Loan ‘Shops’
3.85 - Noted - case study reference: Parades of Shops - towards an understanding of Performance & Prospects CLG (2156925.pdf)
3.86 - Noted amended

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**Comment Number 257**
**From** Woodland Trust - Victoria Banks
**Statement** Suggested wording: Outside the shopping parades, Sainsbury’s Supermarket is a major supplier of foodstuffs to the community and surrounding. This policy supports future A1 development on this site on the condition that any future development complies with parking requirements, visual height restrictions of the surrounding tree screens and due regard to trading impacts on the Parades.
**Action:** Recommendation: Noted

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**Comment Number 51**
**Title** 27 B-EMP 3: Business Accommodation

The loss of any B class use will be strongly resisted. Proposals for alternative uses will be expected to be accompanied by marketing information to demonstrate that the premises have been actively and prominently marketed for B use for 18 months prior to application. Any change of use must be accompanied by full justification of need and in compliance with normal development control criteria. This policy is subject to current permitted development rights in force at the time of application.

**From** Liz Hyland
**Statement** Strongly Agree
**Action:** Recommendation: Noted

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**Comment Number 78**
**From** Angelina Taylor
**Statement** I agree that any business/office space should be preserved and encouraged in order to avoid being a dormitory village. However scale should be carefully considered in order to minimise congestion.
**Action:** Recommendation: Noted

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**Comment Number 134**
**From** Martin Grant
**Statement** Draft Policy EMP3: Business Accommodation

The above draft Policy deals specifically with the loss of existing employment accommodation and fails to show regard to the provision of new employment floor space. On this basis, MGH objects to the draft Policy and requests that it is more positively worded to take into consideration proposals for new employment opportunities within the ward. The current proposals for Gosden Hill will deliver a range of employment floor space as

B-EMP 3: Business Accommodation

The loss of any B class use will be strongly resisted. Proposals for alternative uses will be expected to be accompanied by marketing information to demonstrate that the premises have been actively and prominently marketed for B use for 18 months prior to application. Any change of use must be accompanied by full justification of need and in compliance with normal development control criteria. This policy is subject to current permitted development rights in force at the time of application.
part of its wider development and support for this should be given within draft Policy EMP3, particularly where its proposed location to be adequately served by public transport provision.

3.55 The following paragraphs respond to the ‘aspirational’ policies as contained within the draft NP. In doing so, it should be borne out that national planning policy guidance, where it relates to plan making, is supportive of aspirational policies but only where these are ‘realistic’ and states that “…only policies that provide a clear indication of how a decision make should react to a development proposal should be included in the plan” (Para. 155, the NPPF). On this basis, MGH recommends that the BF gives further thought to the requirement for the following ‘inspirational’ policies which if deemed realistic, should be included within the remainder of the draft NP and not specifically referred to as ‘inspirational’.

Action: Recommendation: 3.54 - Noted
3.55 - Noted

Comment Number 175
From John Lobley
Statement I agree with this policy as preservation of business premises is essential
Action: Add to supporting text
Recommendation: Noted

Comment Number 214
From GBC
Statement 3.87 It is not uncommon for local plans to require a period of marketing prior to change of use and policy E3 of the Guildford Local Plan 2003 asks for a marketing period of 12 months. However, the NPPF (paragraph 22) states that ‘Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose’ and (paragraph 51) requires us to ‘identify and bring back into residential use empty housing and buildings’. The impact of NPPF policy is that we often need to accept a marketing period of less than 12 months. A marketing period of 18 months would be considered onerous and we would expect such a requirement to be supported by robust evidence that sets out clearly why the period is needed and why 18 months has been chosen as the appropriate option. The existing supporting text does not provide enough justification.
3.88 The policy does not recognise that the change of use from B1(a) to residential use is currently classed as permitted development (until 2016). Is the policy asking for an Article 4 direction to protect the remaining office space within Burpham? If so, this should be stated.
3.89 The supporting text suggests that the aim of the policy is to protect existing offices. However, the policy seeks to protect all B class use. Not all B class employment is for offices. Is the intention to protect all B class uses?

Action: Recommendation: 3.87 - Noted - This policy refers existing B-Class and not to allocat employment use.
3.88 - Noted - Plan long term of 20 years Not we are not seeking article 4 Direction.
3.89 - Noted - Change ‘office’ to ‘Business.’

Appendix 3: Local Green Space Zones

Comment Number 226
From GBC
Statement Neighbourhood Plan Appendix 3: Local Green Space Zones
4.14 The NPPF (paragraphs 76 and 77) gives neighbourhood plans powers to designate land as Local Green Space where this is consistent with the local planning of sustainable development and complements investment in sufficient homes, jobs and other essential services.

4.15 The NPPF states that the Local Green Space designation will not be appropriate for most green areas or open spaces, and should only be designated where the green area is ‘demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife’. Given this requirement, we would expect the sites identified in the plan to have come from consultation with the community, or through a neighbourhood survey. It is not clear how these sites have been chosen so the accompanying text needs to explain the process. At present, it appears that the designation has been applied simply to every green space in the neighbourhood area.

4.16 The NPPG states that plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making. The application of the designation to all the green spaces in the neighbourhood area, and in many cases the lack of accompanying text explaining why these spaces have been chosen, suggests the main purpose of designation these spaces is to prevent development within the neighbourhood area. This is not in accordance with the NPPG and therefore does not comply with basic condition 1.

4.17 The NPPG states that the qualifying body (Burpham Neighbourhood Forum) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space, but no details are given. Could this be included in the appendix?

**Action:** Recommendation: 4.14 - Noted

4.15 - Noted - Missing Individual assessments - All green spaces within the built area are part of the site development plans - agreed by GBC Planning department - to Provide Recreational and Open space some dating back to the 1940’s. It is not the main purpose to prevent development, But to maintain and protect the character of each location. Reference Survey pages 12 & 15. The extremity Local Green Spaces form Natural Wild Life Corridors and Walking Areas for the benefit of all the community. - Descriptions will be enhanced.

4.16 - No Local Green space has been designated to prevent development. Noting No sites within the Burpham Ward have come forwarded in the latest SHLAA except a New Village proposal within the Current Metropolita in Greenbelt adjacent and within Burpham Political Ward Boundary.

4.17 - Noted

Comment Number 227

From GBC

**Statement** General Description (page 4)

4.18 The General Description section uses language which is not suitable for a statutory planning document. Whilst this is, to some extent, a subjective exercise, the description should aim to be analytical and minimise the use of excessively poetic language, superlatives and subjective opinion.

**Action:** Recommendation: Noted -

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Comment Number 228

**Title** Appendix 3: Local Green Space Zones

From GBC

**Statement** Box entitled ‘Merrow Common Sites 3, 4, 5’ (page 7)
4.19 The text describes the area as ‘Ancient woodland with blanket Tree Preservation Order’. This is misleading as a small part of site 5 only is designated as ancient woodland and only sites 4 and 5 have Tree Protection Orders. Site 3 is covered above this section and sites 4 and 5 are covered below it. Has this section been left in from a previous version of the plan by mistake?

**Action:** **Recommendation:** 4.19 - amended.

Comment Number 229

From GBC

**Statement** Sites 6, 7, 8, 9 (page 10)

4.20 The accompanying text describes these spaces effectively as grass verges, while the text heading the section explains that they ‘are exceptionally important to provide quality of life for the residents’ and ‘provide that special relief of grass and tree’. This is not consistent. The supporting text needs to be improved to explain why these spaces are demonstrably special to justify the Local Green Space designation. We recommend improving the descriptions of each space to explain the specific value of each (recreational, wildlife, historical significance etc.). However, it seems likely that most of these spaces are unsuitable for the designation.

4.21 The SNCI Review 2007 is included on page 9 as an image but is unreadable due to the image size. Could this be reproduced as text in an appendix instead?

**Action:** **Recommendation:** 4.20 Amended Expanded

4.21 Ok Amended

Comment Number 230

From GBC

**Statement** Sites 15, 16, 17 (page 12)

4.23 The accompanying text explains that the three sites include semi-mature flowering trees.

Does this space have special significance for the local community due to the flora? If so, the supporting text should state this clearly.

**Action:** **Recommendation:** 4.23 - Noted More Justification Added

4.24 - Noted

Comment Number 231

From GBC

**Statement** Sites 10, 11, 12, 13, 14 (pages 11 and 12)

4.22 The text heading the section explains that these spaces ‘are exceptionally important to provide quality of life for the residents’ and ‘provide that special relief of grass and tree’. It is not clear how this is possible as these spaces are traffic islands and some are fairly small. The supporting text needs to be improved to explain why these spaces are demonstrably special to justify the Local Green Space designation. We recommend improving the descriptions to explain the specific value of each space (recreational, wildlife, historical significance, landscaping etc.).

**Action:** **Recommendation:** 4.22 We disagree strongly with the term 'Traffic Island'

These sites replicate village Greens. Minimum size is not a criteria of the local Green spaces policy.

Comment Number 232

From GBC

**Statement** 30, 31 (pages 12 and 13)
4.24 The accompanying text explains that the three sites include mature trees and grasses. Does this space have special significance for the local community due to the flora? The introductory text at the start of the section states that the larger sites double up as informal recreation space. Is that the case on these two sites? The supporting text needs to build the case for the sites being demonstrably special for the local community by explaining this, including recreational and aesthetic value if appropriate.

Site 34 (page 14)

4.25 As with sites 15-17 and 30-31, the supporting text needs make a stronger case for the site being demonstrably special for the local community. At present the site has no supporting text and relies on the introductory text at the start of the section. Support for this area to be designated as Local Green Space could include explanations of how the land is used or the aesthetic/landscape value it provides.

**Action:** **Recommendation:** 4.24 - Noted 4.25 - Noted amended

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**Comment Number 233**

**From** GBC

**Statement** Local Green Space: “Unregulated exercise areas” (page 15)

4.26 It is not clear what the phrase ‘unregulated exercise areas’ means as most green spaces used for exercise are not regulated, and those spaces are often used for activities other than exercise. Would ‘informal recreation space’ be a more appropriate term?

**Action:** **Recommendation:** 4.26 - Noted - amended

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**Comment Number 234**

**Title** Appendix 3: Local Green Space Zones

**From** GBC

**Statement** Box entitled ‘The Wey Navigation’ (page 16)

4.27 It is not clear why this section is included. Is the navigation being designated as a Local Green Space? If it is, this needs to be made clear.

**Action:** **Recommendation:** 4.27 - Noted - Clarified

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**Comment Number 235**

**From** GBC

**Statement** Local Green Space: regulated recreational areas (page 19)

4.28 A term often used in planning is ‘formal recreation space’. Would this be a clearer term?

**Action:** **Recommendation:** 4.28 - Noted - Amended

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**Comment Number 236**

**From** GBC

**Statement** Site 33 (page 20)

4.29 Site 33 is a playing field owned by the George Abbott school. The school has advised that public access is prohibited, though some people do enter through holes in the fence. While the NPPG states that land can be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty), it is difficult to see how a private playing field could meet the requirements of the Local Green Space designation.

4.30 The NPPG states that the qualifying body (the forum) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. The
supporting text does not state whether the school has been contacted or whether they agree with the proposed designation.

**Action:** Recommendation: 4.29 - Noted
4.30 - Noted - Under NPPG 77 No requirement for Local Green space to be open to the public

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**Comment Number 237**

From GBC

**Statement** Sites 23, 24, 25 (pages 22 and 23)

4.31 It is not clear why these sites have been chosen. Sites 24 and 25 are embankments for Clay Lane, and site 23 is a private space behind a fence. Whilst they undoubtedly do provide habitat for animals (the justification in the introductory text for the section), it is not clear how they are particularly special for the local community. The supporting text needs to explain why these sites have been chosen and whether the landowner of site 23 has been contacted.

**Action:** Recommendation: 4.31 - These sites are designated Wild Life Corridors. In Reference to Land Owner (GBC) At least five members of the Owners staff including the C.E. Have all been notified - this responce and lack of objection Confirms contact & approval of designation.

**Appendix 4: Reference documents**

**Comment Number 238**

From GBC

**Statement** Neighbourhood Plan Appendix 4: Reference documents

4.32 The first line of this appendix (under the title) reads ‘Appendix 1: Reference Documents List’.

Including ‘Appendix 1’. Has this been left in the document in error?

4.33 The reference list should state which organisation or person has produced each document (for example, Guildford Borough Council, Surrey County Council, etc.)

4.34 The majority of these documents are publicly available on the web (for example, legislation).

Please provide links in the document.

4.35 The introductory text describes the documents as ‘Documents used in the Construction of the Neighbourhood Plan’. There are a very large number of documents in this list but very few are referenced throughout the plan. If these documents have been used in drawing up the plan, this should be referenced in the text at the policies they are supporting. This will help provide a justification for those policies.

4.36 Item 4 describes the Local Plan 2003 as the ‘Obsolete plan for Guildford Borough’. The 2003 Local Plan is the currently adopted local plan and is not obsolete.

4.37 Item 30 is listed as ‘How we will fund and develop programmes of schemes in the coming years’. Is this a document? This is not clear. It could be a note for item 29.

4.38 Item 32 is listed as ‘How the Surrey Transport Plan - Local Transport Plan 3 - will impact on the environment and on different groups of people.’ Is this a document? This is not clear. It could be a note for item 31.

4.39 Items 35 and 36 – links do not go to the correct document.

4.40 Item 38 – the link does not go to the correct document (note: the technical guidance to the NPPF has been revoked and replaced by the NPPG).

4.41 Item 41 – this is a repeat of item 33
4.42 Item 48 – this item is listed as ‘No Additional Documentation’. Is this an error?
4.43 Item 50 – who produced this guidance? Can a link be provided?
4.44 Item 51 – is this an error? There is no planning application number.
4.45 Item 52 – is this the National Planning Policy Guidance? Please write the name in full and provide a link.
4.46 Item 54 and 55 – many people will not understand the meaning of SHLAA. Please spell the title in full. Some entries have explanatory notes and perhaps this could benefit from the same.
4.47 Item 56 – this needs more information/explanation and ideally a link.
4.48 Item 58 – is this an error? It contains no information.
4.49 Item 59 – this needs to be written in full.
4.50 Item 69 – makes reference to the forum plan. Should this be the neighbourhood plan?

Action: Recommendation: 4.32 - 45 Noted and Amended as appropriate

Appendix 5: Neighbourhood Survey Summary

Comment Number 239
Title
From GBC

Statement 4.51 We agree that neighbourhood plans should reflect the needs and concerns of the communities they serve, and agree that a neighbourhood survey is an excellent starting point. The Burpham neighbourhood survey forms a key part of the evidence base.
4.52 However, there is no explanation of the methodology used. We recommend including a section that sets out the survey methodology in order to demonstrate the robustness of the engagement exercise. This will help make it clear that the plan is underpinned by, and reflects the needs and desires of, the local community and key stakeholders.
4.53 We do not believe the survey has been written in an objective manner. The questions asked and options offered tend towards conservation and protectionist planning rather than, for example, innovation and development and it is very likely that this has biased the results. We have highlighted particular questions where this is the case.

Question A1
4.54 The phrasing used is ‘To what extent do you agree or disagree that any future development in Burpham should be in keeping with the Ward’s character and landscape setting.’ This question is unbalanced and seems designed to elicit a response that supports conservative design policies. This question should have been phrased in a neutral way and would have been more suitable as an open question.

Question A2
4.55 The question asks ‘Should the Neighbourhood Plan aim to protect and enhance the quality of the built environment by promoting the following:
- Design that respects the scale & design of the existing surrounding architecture
- Minimum standards for living space in dwellings
- High levels of energy conservation in new buildings
- The green space and gardens within the settlements
- Better pedestrian and cycle access to Guildford town centre and recreational ‘green’ areas
- Signage, advertising and street furniture that respects the locality
- Traditional styles and scale of shop fronts
- Other, please specify’
The question assumes the respondent wants to protect the existing built character and the options offered do not include any that favour development or innovation in design. The NPPF supports innovative design (paragraph 63).
4.56 The supporting text does not explain how this short list of options was achieved. Were these priorities identified during community engagement?

Question A6
4.57 The question asks ‘Which of the following ways of producing local renewable energy, should the Plan Encourage?’ The options given are limited. Notable omissions include community scale solar schemes and district heating/cooling networks. Community schemes enjoy support in national policy through generalised support for decentralised energy networks and district heating/cooling has been identified as a cost effective way of decarbonising energy in the UK. Omission of these options will clearly bias the results towards other options.

Question E4
4.58 The question asks ‘If new homes are to be built, how many should be assigned by 2026 within the Burpham Ward?’ and offers the following options:

- Over 1000 on Green Belt. The implication over 20 years of ‘going into green belt’ with development
- None; Burpham ward is full up
- Under 100 in Back Gardens and on our village green spaces

4.59 It is not clear where the figure of 1000 homes on the Green Belt land within the Burpham ward has come from. The majority of Green Belt in Burpham ward is at Gosden Hill Farm which is a proposed site allocation in the draft Local Plan: strategy and sites. The proposed site allocation at Gosden Hill Farm is 89 hectares and the part of that site that falls within Burpham is approximately 25 hectares, less than a third of the overall site. The site has been allocated for 2000 homes and at present it is impossible to say how many will be built within Burpham ward. Presenting this figure as an option and stating that this is “The implication over 20 years of ‘going into green belt’” is incorrect and potentially misleading.

4.60 Equally the figure of under 100 homes on back gardens and green spaces seems to have no basis.

4.61 The inclusion of the phrase ‘Burpham ward is full up’ next to the zero homes option could have resulted in respondents being lead towards selecting that option.

4.62 We believe that the wording of this question and the choice of options offered has introduced significant levels of bias into the results and that the results are therefore not robust.

Questions C2 and A6:
4.63 At questions C2 and A6 respondents have been offered an option of installing solar panels along the A3. It is not clear where this option has come from and why it has been offered on two occasions. Was this option identified during community engagement? If so, this needs to be stated.

Question B3
4.64 The question asks ‘Where should employment land be located?’ This question gives two options: in Burpham or elsewhere in Guildford. The option of elsewhere in Guildford is beyond the remit of the plan and is therefore not a viable option. The phrasing of the questions suggests that the plan has the ability to push employment land out of Burpham and is therefore misleading.

**Action: Recommendation:**
4.51 - Noted with surprise
4.52 - This would be disproportionate to the requirements of a Neighbourhood Plan
4.53 - We Note with Interest - Comments which are baseless - the Council had a copy of the Survey prior to print for Comment No Assisitive comments were received. NB: over 21 Draft Versions were completed prior to Going to print.
4.58 - Over 1000 From the application in 1984 by the land owner. None from members of the public - during construction of the Survey. Under 100 from the GBC outline plane 2004 Ref 04/P/00405

**Appendix 6: Burpham Neighbourhood Forum Survey**

*Comment Number 240*

*From* GBC

*Statement*

4.65 The words ‘Appendix 6’ are currently missing from the title page so at present this section appears to be part of Appendix 5. For clarity, can this section be clearly labelled as Appendix 6?

4.66 On page 5 it explains that 3000 paper copies of the survey were printed and delivered to every property in Burpham ward. However, the section cites the 2011 census and states that there are only 2367 properties within the ward. Is this an error? If not, where were the additional 633 surveys used?

4.67 The text states that ‘Four categories of ‘electronic’ survey submission were deemed suspect’. This could be considered offensive. Perhaps ‘four categories of electronic survey submission were rejected’ would be more appropriate.

4.68 It is not clear why the response from the school was rejected. Neighbourhood planning must be open to all those who live and work in the area. Were responses from other non-residential properties rejected because this was a survey of residents only? If so, how were businesses, schools, landowners, local groups and other non-resident groups and stakeholders consulted? This needs to be set out somewhere in the document and the evidence collected from those engagement activities needs to be presented.

4.69 The location of an IP address that provided an offensive comment is not relevant. This reference should be removed as it is not appropriate for a statutory document

*Action: Recommendation:* 4.65 Noted.

4.66 All copies were distributed - no error - simply the distribution to Shops, on visitors Cars, to individuals walking the street, were not included in the general description

4.67 Noted Document 'sealed' 2013 This in electronic terms v Election terms would equate to Deliberately Spoiled.

4.69 Noted but as the document was 'agreed and sealed' in 2013 changing the document at this late stage is inappropriate Noting the GBC had copy of the document at that time and made no comment to this effect prior to it being secured.

**Appendix 8**

*Comment Number 241*

*Title* Neighbourhood Plan

*From* GBC

*Statement*

4.70 Appendix 8 shows draft policies that have been used in the plan. It is not clear what purpose this section serves. Can it be removed?

*Action: Recommendation:* 4.70 - Now amended to contain Facts about Flooding and Sewers in Burpham

**Appendix 9: Burpham Neighbourhood Plan Historic Sites B-EN 5: Historic Environment**

*Comment Number 242*
The plan shall protect the visual and heritage amenities of the historic views and historic setting, as described in the character assessment appendix of this plan. Permission will be granted for development that conserves and enhances the following listed buildings, historic places and their settings (noting this is not an all-inclusive list): See appendix 5 Sutherland Memorial Park.
Pimms Row cottages and area.
New Inn Farm House and Lilac Cottage.
Bowers lock.
Royal Mail pillar box in Kingpost parade - Edward VIII locally listed.
Planning proposals shall be expected to have due regard to the character assessment allocated to the individual locations. The effect of a planning application on a non-designated heritage asset should be taken into account when determining the application.

From GBC

Statement 4.71 The text in the title page states 'Note: All maps within this Neighbourhood plan [sic] originate from... The ordnance Survey licence system held by Guildford Borough Council or Surrey County Council'. This contradicts a similar note at Appendix 1.

4.72 Licence data is already attached to each map. However, due to image compression it may not be readable. Can the licence data be reproduced beneath each map? It must be readable to avoid copyright infringement. The note on the title page is not needed if this is done.

Action: Recommendation: Simple errors of copyright declarations

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Addendum.

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<tr>
<th>Page above</th>
<th>Original Respondent</th>
<th>Policy (As per Reg 14)</th>
<th>Original comments made by consultees - All Comments can be found in pages 1-114 above</th>
<th>Original response by BNF to BNF 11</th>
<th>Councils comments on Regulation 15 consultation statement</th>
<th>BNF response to councils additional comments made following Regulation 15 submission</th>
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<tr>
<td>16</td>
<td>GBC</td>
<td>General</td>
<td>2.23 It would be helpful if the introduction sets out role of the plan and the relationship between the plan and the Local Plan for the benefit of readers that are new to planning.</td>
<td>Noted</td>
<td>No consideration of this comment is presented</td>
<td>No separate vision statement is required under statutory legislation. Notwithstanding this, we have placed an Introduction on the amended Reg 15 Document submission. Together the policies in this plan constitute the vision.</td>
</tr>
<tr>
<td>16</td>
<td>GBC</td>
<td>General</td>
<td>2.24 The plan lacks a section setting out the vision for the neighbourhood area over the 20 year life of the plan. This could also set out the aims and objectives of the plan. Including a vision will help the public, prospective developers and decision makers by setting out clearly the intent of the plan. It will also set a context to help justify the policies that follow. The vision should most suitably reflect the outcome of community and stakeholder engagement.</td>
<td>No requirement for a 'vision' statement</td>
<td>Limited consideration of this comment is presented, however the substance of the comment is largely missed.</td>
<td>Please see our substantial suite of documents submitted under Regulation 15</td>
</tr>
</tbody>
</table>

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2.25 The plan lacks a section explaining how the community and key stakeholders have been engaged to produce the plan. Engagement should be an ongoing process throughout the development of a neighbourhood plan. The only evidence presented currently is a single survey of residents. We recommend that the plan clearly sets out the engagement exercises undertaken (e.g. Consultations, publicity events, surveys, questionnaires, workshops, meetings, interviews) and identifies the key stakeholders that were involved in the process. We note that the engagement strategy is summarised very briefly in the History of the Plan section but this does not provide sufficient information or detail.

2.25 - This is a requirement of Para 15 of the NPPF not Para 14...

No consideration of this comment is presented

2.31 The document presents policies in two separate sections; ‘Policies’ and ‘Aspirational policies’. It appears that ‘policies’ are land use policies, and aspirational policies are not. If this is the case this needs to be explained. (The relevance of the two types of policies also needs to be explained for the benefit of the reader.) There also needs to be some discussion of how aspirational policies will be achieved. We support the inclusion of non-land use policies in neighbourhood plans and think these policies could usefully follow from or form part of a vision section. Including a vision could also help provide justification for these policies and lend them more weight.

Noted

No consideration of this comment is presented

Introduction paragraph added. Noted and actioned

2.32 The need for clarity in neighbourhood plans is supported by the NPPG, which states that the plan should be ‘drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning application’. It should be concise, precise and supported by appropriate evidence.’ At present, the plan does not meet this requirement and is therefore not compliant with basic condition 1.

2.32 - Noted - The council has chosen not to quote the last sentence of Para 41 NPPG which states Policies should be distinct and reflect and respond to the unique planning context of the Specific neighbourhood Area which has been prepared - we therefore disagree with this statement.

Limited consideration of this comment is presented. The main thrust of the comment is that the plan needs more clarity and support. The response doesn’t really address this.

Noted. Individual comments have been amended.
|   |   |   | Neighbourhood plans cannot designate Green Belt boundaries. As written, the policy is attempting to tie the Green Belt boundary to the boundaries in the 2003 Local Plan proposals map. This policy is therefore not compliant with legislation. | The wording was GBC advised | The content of this comment has not been considered i.e. that the policy is not compliant. We would recommend wording along the lines of 'The community shows strong support for retaining the present Green Belt boundary' if that is appropriate. | Noted. Policy re-worded to comply with the NPPF |
|---|---|---|---|---|---|
| 21 and 27 | GBC | EN, |   |   |   |

|   |   |   | 3.10 The main thrust of this policy appears sound. However, the supporting text that defines 'adversely' is too prescriptive where it sets a limit on plot coverage and refers to siting of buildings. | 3.10 - This policy is designed to maintain the special nature and characteristic of the plan area. Change wording from Adversely to unacceptably detrimental | Limited consideration of this comment is presented. The main thrust of the comment is that the limit set on plot coverage is too prescriptive, not an objection to the use of the word 'Adversely'. | This is for the examiner to comment on. |
|---|---|---|---|---|---|
| 29 | GBC | EN, |   |   |   |

|   |   |   | 3.11 It is not clear how the definition of 'adversely' has been arrived at. An explanation of why these particular ratios of dwelling to garden size have been chosen is needed to provide a justification for the policy. We would expect such a prescriptive policy to be accompanied by robust evidence and justification. However, it is likely that such a requirement would not be acceptable. | 3.11 - Noted see 3.10 above | As above | To preserve and uphold the character of the community, following discussions with residents. |
|---|---|---|---|---|---|
| 29 | GBC | EN, |   |   |   |

<p>|   |   |   | 3.14 The supporting text refers to the Character Descriptions of Burpham document in Appendix 2, which forms part of the evidence base. Appendix 2 demonstrates that density is not uniform cross the neighbourhood area. In the north west corner of the neighbourhood area, many existing dwellings already exceed the 33/66 per cent ratio. Applying this rule in those areas would result in a change to the existing character. Therefore, as a blanket policy it does not meet the aim of maintaining character (the main aim of the policy is not stated, but we assume that this is the aim – this needs to be stated for clarity). | 3.14 - We are not setting density | Limited consideration of this comment is presented, however the substance of the comment (the appropriateness of a 33/66 per cent rule) is largely not addressed. | We are looking to ensure that all future development is of high quality and character, responding to issues raised by residents in the survey. |
|---|---|---|---|---|---|</p>
<table>
<thead>
<tr>
<th>35</th>
<th>DR</th>
<th>The policy is vague and deals with two separate issues namely the historic environment and “natural features”. The historic environment is made up of many things such as listed buildings, conservations areas, ancient scheduled monuments et al all of which have different statutory tests applied to them. It should be noted that these protections are part of the NPPF and will be applied. At present the policy wording is not consistent with the NPPF and does not define/distinguish between different heritage assets. It is accepted that the plan can support future designations of Ancient Woodland but the policy itself cannot make this designation or even compel the designation to be made. The policy also talks of protecting certain views but does not specify where the views are from. This may be outside the powers of a Neighbourhood Plan and will need looking at again potentially taking additional advice. [Setting of Listed Building covered by Policy HE4 of GLP. Suggested policy:] Unable to determine whether this comment has been considered. Amended to reflect DK AA comments.</th>
</tr>
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<tbody>
<tr>
<td>47</td>
<td>GBC</td>
<td>3.20 We support the use of the Local Green Space designation to preserve the green spaces that make a positive contribution to Burpham. However, Local Green Spaces must be ‘demonstrably special to a local community and hold particular significance’ (NPPF paragraph 76). Some of the designated Local Green Spaces seem not to have had this test applied - see the comments against Appendix 3. The NPPG states that ‘Whether to designate land is a matter for local discretion’. However, there still needs to be an explanation for why each space has been chosen. We suggest that further work is done to evidence the selection of sites for Local Green Space designation to ensure that all the spaces can be justified against this requirement. 3.20 - Noted we use our ‘local’ discretion No consideration of this comment is presented. Amendments were made to the Local Green Space descriptions that improved the justifications in the reg 15 version of the plan. This action should be included here. Policy renumbered and amended</td>
</tr>
<tr>
<td>50</td>
<td>GBC</td>
<td>3.24 The supporting text states that the aim of the policy is to control the heights of buildings so that they do not emerge above the tree line. The policy wording is vague and is not sufficiently clear or precise to meet this aim. The text of the policy needs to state clearly what developers need to achieve or avoid. As written, development management officers will find this policy difficult to implement. 3.24 - Noted; No consideration of this comment is presented Policy deleted – principles amalgamated with other polices</td>
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<tr>
<td>No.</td>
<td>Name</td>
<td>Policy</td>
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<tr>
<td>54</td>
<td>Anthony Morgan</td>
<td>FD6</td>
</tr>
<tr>
<td>56</td>
<td>Anthony Teal</td>
<td>FD6</td>
</tr>
<tr>
<td>57</td>
<td>GBC</td>
<td>AC1</td>
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</table>

Comments noted. Policy amended. BNF 5 Appendix 4 Water and Flooding was generated to cover this response.

The policy is designed to ensure sufficient information is included in a planning application to address infrastructure matters.
<p>| | | | | |</p>
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<tbody>
<tr>
<td>60</td>
<td>Philip Johns</td>
<td>General</td>
<td>Any talk about development seems to be met with a negative reaction, the website talks about the future and our children, if the community continues to fight any development plans there will be no future as our children will have nowhere to live and will be driven out of the area, some of the aims should be to accept that we need to develop (the population is growing!) but the fight should be to develop in the right way - with property that our children and people from the local community can afford, currently all of the development in the area is larger and more expensive properties of which are not affordable to the younger local generation, if this continues local youngsters will have no option but to move away, so I believe the aim should be to fight for what the area needs rather than fighting to stop anything changing - yet we would all love to keep the area similar to what it is today but the world is changing, the population is changing and we need to address the changes as best we can so that they work for the local communities advantage rather than trying to stop every development idea. I have friends in the local area all with children that have just finished school or university, 3 out of 4 have moved away from the local area as there is nothing that is affordable for them to rent or buy.</td>
<td>Noted</td>
</tr>
<tr>
<td>67</td>
<td>CRC</td>
<td>FD3</td>
<td>It is not clear what future developers on the site need to achieve or avoid. This policy, as written, sounds like a vision statement. We suggest moving this to a vision section, or rewriting the policy so it is clearer as a policy statement as to what is acceptable.</td>
<td>3.49 - Noted</td>
</tr>
<tr>
<td>68</td>
<td>MGH</td>
<td>FD4</td>
<td>MGH objects to the draft Policy finding it ineffective and unnecessary and failing to accord with both national and local planning policy which seeks to facilitate the delivery of a wide choice of homes to meet a range of housing needs. MGH suggests that to avoid the risk of confusion and conflicting policy objectives, matters of affordable housing provision are solely addressed by the emerging GBLP and draft Policy FD4 is deleted as a result.</td>
<td>3.40 - Noted - Policy amended in accordance with GBC Response</td>
</tr>
</tbody>
</table>

The main point of the comment has not been considered. The submission plan still includes an affordable housing policy. A response is needed to set out why the policy is retained e.g. local needs are different to the needs of the borough etc...

As this comment contradicts Philip Johns, it is impossible to meet both respondents’ wishes.
<p>| 75 | MGH | FG6 | 3.47 MGH objects to draft Policy FD6, finding it unnecessary given that GBC, under their development management remit, require proposals to demonstrate how their demands upon utilities, services and infrastructure can be met and/or appropriately mitigated for. In addition, the NPPF requires development proposals to give priority to sustainable drainage systems. GBC, within their draft Local Plan and using CIL and S106 monies, will seek to ensure &quot;...vital infrastructure is available when needed and where necessary through the use of phasing provisions&quot; (Proposed Policy 17, draft Local Plan (July 2014)). On this basis, MGH recommends the removal of draft Policy FD6 in its entirety given fails to align accordingly with the Borough’s emerging strategic policy in this regard. |
| 76 | DR | TL | Provides very clear standards and is a land use planning policy. Some concerns over provision as it is stating that all development must provide significant parking. May not be able to justify against national policy and could make development unviable and undeliverable. Level of provision being asked for seems inflexible (lesser provision in exceptional circumstances only) and goes against the promotion of sustainable development. It could be very hard to justify that a 3 bedroom dwelling requires three parking spaces. |
| 80 | GRC | TL | 3.31 The supporting note makes reference to car usage in Guildford borough and surrounds being high, based on the 2011 census. This data should be included to support this contention and evidence the policy. This data could sit in an appendix. |
| 80 | GRC | TL | 3.32 The supporting text needs to explain and justify why Burpham warrants a different parking standard. Note 2 states ‘Parking standards are designed to prevent on-street parking which has proved unsustainable in Burpham’. This contention needs to be supported. |</p>
<table>
<thead>
<tr>
<th>Page</th>
<th>Column 1</th>
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<th>Column 3</th>
<th>Column 4</th>
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<tr>
<td>81</td>
<td>3.34</td>
<td>This policy needs some additional supporting text and commentary. The supporting text references the survey but doesn’t state which part of the survey. The survey is a large document so it should give a more precise reference.</td>
<td>3.34 - Noted</td>
<td>No consideration of this comment is presented.</td>
</tr>
<tr>
<td></td>
<td>3.35</td>
<td>The policy is seeking planning obligations for infrastructure. It should make it clear that contributions will only be sought where consistent with NPPF paragraph 204 and the CIL</td>
<td>3.35 - Noted</td>
<td>No consideration of this comment is presented.</td>
</tr>
<tr>
<td>84</td>
<td>3.71</td>
<td>This policy needs some supporting text and commentary and will need to be supported by a robust planning justification if it is to be enforced during planning applications and defended at appeal. Generally, it is too prescriptive for planning policy. The aims of the policy are not clear.</td>
<td>Noted</td>
<td>No consideration of this comment is presented.</td>
</tr>
<tr>
<td>84</td>
<td>3.72</td>
<td>The policy states that the footprint of new dwellings must not exceed 30 per cent of the plot size. There is no explanation as to why this figure has been chosen or how this particular figure has been reached and generally such a policy would be considered too prescriptive. There needs to be robust support for such a policy in the supporting text as it is likely to be challenged.</td>
<td>3.72 - Noted - amended to 33%</td>
<td>No consideration of this comment is presented.</td>
</tr>
<tr>
<td>84</td>
<td>3.74</td>
<td>In some parts of Burpham (for example, the 1980s estate in the north west corner of the neighbourhood area) existing dwellings exceed this ration. Requiring new dwellings in this area to be built at a maximum of 30 per cent of the plot size would not be in keeping with the existing character. This conflicts with policy FD 1.</td>
<td>3.74 - Noted - This Policy is to prevent further overcrowding in the plan area which has occurred in Raynham Close.</td>
<td>No consideration of this comment is presented.</td>
</tr>
<tr>
<td>85</td>
<td>3.76</td>
<td>The policy relating to flats could result in them being surrounded by large areas of open space; for example a development of ten two-bedroom flats, each with an internal floor area of 75 metres, would require an open space requirement on 1500 square meters. This is inefficient and therefore unsustainable use of space and therefore does not comply with basic condition 2. This policy is unlikely to be deliverable and therefore does not meet basic condition 1.</td>
<td>3.76 - Within the elements of the ‘private land to include - Storage recycling bins Cycle Storage, Car parking for Occupiers and Visitors</td>
<td>No consideration of this comment is presented.</td>
</tr>
<tr>
<td>85</td>
<td>3.77</td>
<td>We recommend this policy is rewritten to be less prescriptive. If the intention of the policy is to prevent back garden developments, or deliver dwellings with larger gardens, perhaps the policy wording could reflect this (as long as the policy meets basic conditions 1 and 2).</td>
<td>3.77 - Noted</td>
<td>No consideration of this comment is presented.</td>
</tr>
</tbody>
</table>
3.49 MGH objects to the draft Policy, finding it to be unduly restrictive in nature and having the potential to conflict with established design guidelines, namely the Urban Design Compendium and Building for Life 12. The draft Policy is also deemed preventative when having regard to the NPPF at paragraph 58 where it requires applicants to "...plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes".

3.49 Noted

3.50 Draft Policy FD7, in its current form, does not give consideration to the variety of characteristics found across a site and should be more prescriptively written in terms of density rather than plot ratio. This is set out in the Guildford Residential Design Guide SPD where it states "...new residential development should be at a density of between 30 to 50 dwellings per hectare net. Densities above this range will be permitted in locations with good public transport accessibility" (Para 5.5 of GBC Residential Design Guide SPD).

3.50 Noted

3.51 MGH recommends that rewording of draft Policy FD7 so that it permits a range of densities, in lieu of any reference to plot ratio, thereby remaining compliant with GBC’s requirements for density, housing tenure, type and size, and would suggest an average density of between 25 and 50 dph for Burpham. This would also ensure the policy is aligned to Building for Life principles (no. 4) which establishes the need for ‘meeting local housing requirements and that the developer should consider how to incorporate a range of property sizes and types on larger developments’ (BFL Para 5).

3.51 Noted

3.53 MGH also finds draft Policy FD7, where it relates to private open space for flatted development, to be over prescribed. Flatted development will require an area of private amenity space which, depending on their design, should be achieved by ‘considering the potential to benefit from solar gain through the buildings orientation and design where this can be achieved without compromising good urban design...’ (BFL sec 6 Para. 8). No quantum has been outlined across GBC’s Local Plan or supplementary documents and therefore MGH recommends that this is evaluated on a case by case basis by the determining authority.

3.53 Noted

86

The vast majority of Gosden Hill is outside the Neighbourhood Plan area

Policy amended and renumbered

We have seriously considered the comments; we are content with the current wording as the dwellings per hectare can easily be achieved via our plot size Policy.

We have carefully considered these comments and believe that our individual plot size gives more and flexible freedom to the developer to design and provide high quality homes and living spaces with no restriction on road or footpath design layout or communal spaces.
<table>
<thead>
<tr>
<th>88</th>
<th>GBC</th>
<th>AT1</th>
<th>3.93 We note that traffic issues have been highlighted in the neighbourhood survey. This could be used to support this policy.</th>
<th>3.93 Noted</th>
<th>The comment has not been considered. The survey evidence has not been added to the policy.</th>
<th>The whole Neighbourhood Plan is based on the Burpham Neighbourhood Survey of 2012. Repetition of this fact is not a statutory requirement – see Introduction</th>
</tr>
</thead>
<tbody>
<tr>
<td>89</td>
<td>Robert Hanford</td>
<td>AT3</td>
<td>It is now acceptable to run light and heavy rail vehicles on the same track. With Oyster card type fare collection minimising the need for station facilities it could be beneficial to see a light rail effingham Junction to Guildford shuttle serving small minimal stops in places where a full length platform would not be practical. For example at Merrow Lane rail bridge and George Abbot school. The service to complement the existing heavy rail service. Will it happen? Who knows if the initial funding would ever be made available. I am not even sure if there would be the demand to support the service. In a perfect world there would be such a service continuing to the University, Hospital and Science Park. Would there be any value adding to the plan a generic sentence stating &quot;Support is given to maximise the use of the existing rail infrastructure where technology permits the introduction of light rail frequent stop solutions to complement the existing services&quot;?</td>
<td>Noted</td>
<td>No consideration of this comment is presented.</td>
<td>This proposal is outside the remit of the Neighbourhood Forum, we noted that no new rail stations are included in Network rail’s comprehensive 30 year plan for the South East of England.</td>
</tr>
<tr>
<td>89</td>
<td>MGH</td>
<td>AT2</td>
<td>3.59 MGH objects to draft Policy AT2 in its current form given it fails to take into consideration the location of the proposed Merrow station on both GBC and MGH owned land, and its association with MGH’s proposals for Gosden Hill which will not only facilitate its delivery, but act as a catalyst for the wider regeneration of the GBC owned Merrow depot to the south.</td>
<td>3.59 - Noted outside plan area</td>
<td>This comment does not appear to have received due consideration. It is not clear whether ‘outside plan area’ means outside the neighbourhood area (which it may not be if the railway halt has entrances on both sides of the tracks) or outside the plan’s remit.</td>
<td>We have carefully considered this option and whilst we support this in accordance with F-AT2 we also note that Martin Grant’s proposal is not included in Network Rail’s comprehensive 30 year plan.</td>
</tr>
<tr>
<td>94</td>
<td>Robert Hanford</td>
<td>AT4b</td>
<td>My comments at FD3 about managing the parking here and on the Aldi site apply. You mention a one or two hour free period. This may be insufficient for the customers of Italian Inspirations if the time my wife spends in there is any indication. As well as mentioning with regard to the needs of the residents of the local flats, please can this be extended to read “having regard to the needs of residents of the flats above and individual businesses”.</td>
<td>Noted</td>
<td>No consideration of this comment is presented.</td>
<td>The GBC parking survey and action is already in progress with a report from the BCA to back up this process</td>
</tr>
<tr>
<td>GBC</td>
<td>EMP1</td>
<td>3.99 This policy needs some supporting text. This is not a land use policy. We assume this is part of a vision, or 'would like to see' list. This needs to be explained in the document.</td>
<td>3.99 Noted</td>
<td>No consideration of this comment is presented.</td>
<td>Amended and policy removed</td>
<td></td>
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<tr>
<td>GBC</td>
<td>EMP1</td>
<td>3.100 Some of the text in the policy sounds like supporting text. Can this be removed from the policy box to the supporting text to make it clear to the reader which is supporting text and which is policy?</td>
<td>3.100 Noted</td>
<td>No consideration of this comment is presented.</td>
<td>Amended and policy removed</td>
<td></td>
</tr>
<tr>
<td>GBC</td>
<td>EMP1</td>
<td>3.101 The policy states that trade is being lost to other areas. Can evidence be presented that supports this view? If it can be evidenced, it should be removed to the justification in the supporting text.</td>
<td>3.101 Noted</td>
<td>No consideration of this comment is presented.</td>
<td>Introductory paragraph added</td>
<td></td>
</tr>
<tr>
<td>GBC</td>
<td>EMP1</td>
<td>3.80 Further to the above, we suggest this policy may need further thought and some expansion. For example, the impacts of office based home working may be different to the impacts of a home based beautician or shipping company. Are developments associated with all these uses acceptable? If the policy relates only to home based offices, this should be made explicit.</td>
<td>Noted</td>
<td>No consideration of this comment is presented.</td>
<td>Policy amended to include other policies</td>
<td></td>
</tr>
<tr>
<td>Woodland Trust</td>
<td>EMP1</td>
<td>Suggested wording: Outside the shopping parades, Sainsbury's Supermarket is a major supplier of foodstuffs to the community and surrounding. This policy supports future A1 development on this site on the condition that any future development complies with parking requirements, visual height restrictions of the surrounding tree screens and due regard to trading impacts on the Parades.</td>
<td>Noted</td>
<td>No consideration of this comment is presented.</td>
<td>B-EMP2; this policy uses these words</td>
<td></td>
</tr>
<tr>
<td>MGH</td>
<td>EMP3</td>
<td>3.54 The above draft Policy deals specifically with the loss of existing employment accommodation and fails to show regard to the provision of new employment floor space. On this basis, MGH objects to the draft Policy and requests that it is more positively worded to take into consideration proposals for new employment opportunities within the ward. The current proposals for Gosden Hill will deliver a range of employment floor space as part of its wider development and support for this should be given within draft Policy EMP3, particularly where its proposed location to be adequately served by public transport provision.</td>
<td>Noted</td>
<td>No consideration of this comment is presented.</td>
<td>There are no publicly available proposals to comment on.</td>
<td></td>
</tr>
<tr>
<td>Page</td>
<td>MGH EMP3</td>
<td>GBC EN4</td>
<td>Noted</td>
<td>No consideration of this comment is presented.</td>
<td>Para 155 refers to Local Plans not Neighbourhood Plans. We are happy to see that the commentator considers our policies are inspirational</td>
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<tr>
<td>104</td>
<td>MGH EMP3</td>
<td></td>
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<tr>
<td>3.55</td>
<td>The following paragraphs respond to the ‘aspirational’ policies as contained within the draft NP. In doing so, it should be borne out that national planning policy guidance, where it relates to plan making, is supportive of aspirational policies but only where these are ‘realistic’ and states that “…only policies that provide a clear indication of how a decision make should react to a development proposal should be included in the plan” (Para. 155, the NPPF). On this basis, MGH recommends that the BF gives further thought to the requirement for the following ‘inspirational’ policies which if deemed realistic, should be included within the remainder of the draft NP and not specifically referred to as ‘inspirational’.</td>
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<td></td>
<td>Noted</td>
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<tr>
<td>104</td>
<td>GBC EN4</td>
<td></td>
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<tr>
<td>3.87</td>
<td>It is not uncommon for local plans to require a period of marketing prior to change of use and policy E3 of the Guildford Local Plan 2003 asks for a marketing period of 12 months. However, the NPPF (paragraph 22) states that ‘Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose’ and (paragraph 51) requires us to ‘identify and bring back into residential use empty housing and buildings’. The impact of NPPF policy is that we often need to accept a marketing period of less than 12 months. A marketing period of 18 months would be considered onerous and we would expect such a requirement to be supported by robust evidence that sets out clearly why the period is needed and why 18 months has been chosen as the appropriate option. The existing supporting text does not provide enough justification.</td>
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<td></td>
<td>3.87 - Noted - This policy refers existing B-Class and not to allocate employment use.</td>
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<tr>
<td>105</td>
<td>GBC EN4</td>
<td></td>
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<td>4.17</td>
<td>The NPPG states that the qualifying body (Burpham Neighbourhood Forum) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space, but no details are given. Could this be included in the appendix?</td>
<td></td>
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<td></td>
<td>4.17 - Noted</td>
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<tr>
<td>108</td>
<td>GBC EN4</td>
<td></td>
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<tr>
<td>4.30</td>
<td>The NPPG states that the qualifying body (the forum) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. The supporting text does not state whether the school has been contacted or whether they agree with the proposed designation.</td>
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<td></td>
<td>4.30 - Noted - Under NPPG 77 No requirement for Local Green space to be open to the public</td>
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</tbody>
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Burpham Consultation Statement part 2 of 4 – Addendum – February (a) 2015
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<table>
<thead>
<tr>
<th>113</th>
<th>GBC</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.67</td>
<td>The text states that ‘Four categories of ‘electronic’ survey submission were deemed suspect’. This could be considered offensive. Perhaps ‘four categories of electronic survey submission were rejected’ would be more appropriate.</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>4.67</th>
<th>Noted Document ‘sealed’ 2013 This in electronic terms v Election terms would equate to Deliberately Spoiled.</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.67</td>
<td>It is not clear whether the comment has been given consideration.</td>
</tr>
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</table>

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<thead>
<tr>
<th>113</th>
<th>GBC</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.68</td>
<td>It is not clear why the response from the school was rejected. Neighbourhood planning must be open to all those who live and work in the area. Were responses from other non-residential properties rejected because this was a survey of residents only? If so, how were businesses, schools, landowners, local groups and other non-resident groups and stakeholders consulted? This needs to be set out somewhere in the document and the evidence collected from those engagement activities needs to be presented.</td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>4.68</th>
<th>None</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.69</td>
<td>No consideration of the main point of this comment is presented.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>113</th>
<th>GBC</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.69</td>
<td>The location of an IP address that provided an offensive comment is not relevant. This reference should be removed as it is not appropriate for a statutory document</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4.69</th>
<th>Noted but as the document was ‘agreed and sealed’ in 2013 changing the document at this late stage is inappropriate Noting the GBC had copy of the document at that time and made no comment to this effect prior to it being secured.</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.69</td>
<td>It is not clear what ‘agreed and sealed’ means. Could this response state that forum members disagree that this is inappropriate and therefore think that it should not be removed?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>113</th>
<th>GBC</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.69</td>
<td>Removed.</td>
<td></td>
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</tbody>
</table>

These spoiled papers giving irrational and irresponsible answers such as ‘Superman’ and, ‘1,000,000 homes needed’ were ignored.

The IP address is relevant to prove that all submissions were legally made. Those making offensive remarks were proven to be outside the Plan area by reference to their ISP. It is extremely unusual to amend a document which has ‘been finalised, i.e. the text may not be further amended, and gone to print.

Noting the GBC had copy of the document at that time and made no comment to this effect prior to it being secured.

It is not clear what ‘agreed and sealed’ means. Could this response state that forum members disagree that this is inappropriate and therefore think that it should not be removed?
Comments where amendments have been identified but have not been made in the plan (no difference between reg 14 plan and reg 15 plan)

<table>
<thead>
<tr>
<th>Page</th>
<th>GBC</th>
<th>Character descriptions</th>
<th>3.25 Some of the text in the policy box might be better in an introduction, setting a scene and establishing a need for the policy.</th>
<th>3.25 - Noted; Amended</th>
<th>The amendment has not been made to the plan</th>
<th>Now Policy EN2</th>
</tr>
</thead>
<tbody>
<tr>
<td>50</td>
<td>GBC</td>
<td>EN6</td>
<td>3.26 We support the thrust of this policy. However, the policy contains climate change actions that cover both adaptation and mitigation. The title could be changed to reflect this content e.g. ‘Adapting to and mitigating climate change’.</td>
<td>3.26 - Noted Amended</td>
<td>The amendment has not been made to the plan</td>
<td>Title amended</td>
</tr>
<tr>
<td>53</td>
<td>GBC</td>
<td>EN7</td>
<td>3.41 Note 1 makes reference to ‘two-level accommodation’. It is not clear what this refers to. Can this be replaced by a clearer term?</td>
<td>3.41 - Amended ground floor plus two additional floors</td>
<td>The amendment has not been made to the plan</td>
<td>Amended to read three storey</td>
</tr>
<tr>
<td>62</td>
<td>GBC</td>
<td>EN1</td>
<td>3.42 Note 2 provides support for setting a local approach to housing density. However, the policy is not setting a density requirement. Has this note been left in from a previous version of the policy in error? As Note 2 recognises, the NPPF requires local planning authorities to boost significantly the supply of housing. A policy that restricts density is likely to do the opposite.</td>
<td>3.42 - Noted and amended (removed)</td>
<td>The amendment has not been made to the plan</td>
<td>Removed Note 2</td>
</tr>
<tr>
<td>63</td>
<td>MGH</td>
<td>FD2</td>
<td>3.34 MGH objects to draft Policy FD2 in its current form given it is negatively worded and fails to take into consideration wider sustainable transport measures which major development can deliver. MGH therefore recommends the rewording of the second sentence to FD2 so that it reads: “Planning permission will only be granted for this form of development in other locations where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Development should be located and designed where practical to accommodate the efficient delivery of goods and supplies and give priority to pedestrian and cycle movements, and have access to high quality public transport facilities” adequate provision exists or has been made for improvements to public transport Services (including park and ride) and improved access for cyclists and pedestrians.”</td>
<td></td>
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</tr>
<tr>
<td>3.34 - Amend as Recommended by MGH</td>
<td>The response suggests an amendment to the policy will be made, however the policy has been removed. A further note against a comment on page 65 advises that Policy FD2 has been deleted. The response to this comment should state the action taken.</td>
<td>Policy deleted - all policies renumbered.</td>
<td></td>
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</tr>
<tr>
<td>66</td>
<td>Robert Hantford</td>
<td>Unknown</td>
<td>I find this section negative and does little credit to the document as it seems to smack of sour grapes at the planning permission granted to Aldi. Can the document reflect the reality and refer to the Green Man/Aldi site. Can the document look forward at how the Aldi development can increase footfall along Kingspost Parade and look at the retail area as a whole. For example recognising that both car parking areas will be used to access both retail areas. Aim to work with Aldi management to have consistent parking restrictions and enforcement on both sides of the London Road. To look at the provision of an Aldi shopping trolley park in Kingspost Parade and require Aldi to charge a deposit for shopping trolley use to prevent shopping trolleys being abandoned in the surrounding area.</td>
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<tr>
<td>Noted - Policy amended to reflect concerns</td>
<td>The response suggests the policy will be amended to reflect concerns. However, the only amendment is to change the word ‘document’ to ‘plan’. It does not appear this comment has received consideration.</td>
<td>Planning constraints are already in place. Many of these comments beyond the scope of the Forum. The Forum is concerned over lack of parking on this site, but can do nothing since planning approval has been granted.</td>
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</tr>
<tr>
<td>80</td>
<td>GBC</td>
<td>T1</td>
<td>3.28 It is not clear how the figures for minimum parking standards have been arrived at. This needs some supporting text setting this out.</td>
<td></td>
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<tr>
<td>3.28 - Common Sense plus actual car ownership levels and 2011 Census data.</td>
<td>The response notes the source of evidence, but the amendment has not been made to the plan.</td>
<td>See Census data for 2011 See previous comments</td>
<td></td>
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</tr>
<tr>
<td>84</td>
<td>GBC</td>
<td>FD7</td>
<td>3.70 The first sentence states that dwelling density will be based on plot size. This needs some explanation as it is not clear what this means.</td>
<td></td>
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</tr>
<tr>
<td>3.70 - Noted amended to add ‘its own plot’</td>
<td>The amendment has not been made to the plan</td>
<td>Now B-FD 2 amended</td>
<td></td>
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<tr>
<td>93</td>
<td>GBC</td>
<td>AT4</td>
<td>3.103 Some of the text in the policy sounds like supporting text. Can this be removed from the policy box to the supporting text to make it clear to the reader which is supporting text and which is policy?</td>
<td></td>
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</tr>
<tr>
<td>3.103 – Noted - Move to Supporting Text</td>
<td>The response suggests amendments have been made, but the policy has been removed. Can the response reflect this change?</td>
<td>Policy amalgamated with B-T1</td>
<td></td>
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</tr>
<tr>
<td>93</td>
<td>GRC</td>
<td>AT4e</td>
<td>3.104 The policy states that ‘Current road parking in Burpham Lane is an existing and increasing problem.’ This needs to be evidenced. Has this come from the neighbourhood survey? If so, this needs to be referenced.</td>
<td>3.104 - Noted - Bus Route changed and Local Committee referring to Aldi Plan requiring extra parking control plus additional places at Burpham Primary School Plus Local Survey</td>
<td>The response suggests amendments have been made, but the policy has been removed. Can the response reflect this change?</td>
<td>Policy amalgamated with B-T1</td>
</tr>
<tr>
<td>93</td>
<td>GRC</td>
<td>AT4e</td>
<td>3.105 The policy calls for ‘Realistic parking restrictions’. This needs some explanation.</td>
<td>3.105 - Noted and Expanded</td>
<td>The response suggests amendments have been made, but the policy has been removed. Can the response reflect this change?</td>
<td>This is realigned with B-AT1</td>
</tr>
<tr>
<td>98</td>
<td>GRC</td>
<td>C1</td>
<td>3.37 If the prohibition on casinos remains, some explanation needs to be given as to how this decision has been made. This needs to be explained and evidenced in the supporting text. There would appear to be no national or local policy background for a blanket ban on casinos.</td>
<td>3.37 - Remove reference to Casio</td>
<td>The amendment has not been made to the plan</td>
<td>After careful consideration This was amended rather than removed.</td>
</tr>
<tr>
<td>102</td>
<td>GRC</td>
<td>EMP2</td>
<td>3.84 The policy does not say which uses will be considered acceptable if marketing is carried out for Class A uses, Class D1 or D2 uses, and no offers come forward for that use. Would any alternative use be acceptable? We recommend rewording to include what uses are considered suitable for a shopping area. Additionally, this policy as written could result in every unit becoming a pub, wine bar or takeaway.</td>
<td>3.84 - Noted any Except Betting and Payday Loan 'Shops'</td>
<td>The comment suggests an amendment to the policy to exclude betting and payday loan shops. However, this amendment does not appear in the policy.</td>
<td>Amended as intended</td>
</tr>
<tr>
<td>Other issues</td>
<td>GBC</td>
<td>BEN6</td>
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<td>48</td>
<td>GBC</td>
<td>BEN6</td>
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<tr>
<td>[Thames Basing Heaths SPA requires that the Plan is subject to a screening exercise, and possibly a SEA. Also refer to the avoidance strategy.] Development will be permitted that protects and enhances sites of interest for nature conservation. The visual impact of new development on views from the countryside should be minimised. The following views have been identified as important: [list of relevant views from landscape and townscape studies] New policy on Local Green Space: The following site is allocated as Local Green Space. Development will not be permitted except in very special circumstances. [could repeat list of appropriate development from the Green Belt policy]</td>
<td>Noted</td>
<td>Comment seems like it has been incorrectly captured</td>
<td>Screening exercise carried out by GBC – policies in the EN section re-worded and re-numbered.</td>
<td></td>
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<tr>
<td>111</td>
<td>GBC</td>
<td>General</td>
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<td>4.53 We do not believe the survey has been written in an objective manner. The questions asked and options offered tend towards conservation and protectionist planning rather than, for example, innovation and development and it is very likely that this has biased the results. We have highlighted particular questions where this is the case.</td>
<td>4.53 - We Note with Interest - Comments which are baseless - the Council had a copy of the Survey prior to print for Comment No Assistive comments were received. NB: over 21 Draft Versions were completed prior to Going to print.</td>
<td>The Council held a meeting with the Forum on December 29 2012 which included a discussion of the draft survey. During this meeting, we raised this issue of objectivity, discussed the content of the survey and provided the forum with examples of good practice from other neighbourhood surveys.</td>
<td>The survey questions and wording to multi choice answers (with ability to make free form comments) were generated with the assistance of professional marketers following discussion with community members.</td>
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