Burpham Neighbourhood Plan

2015 – 2035

BNF 12: Consultation Statement

Part 3 of 4

The Neighbourhood Planning (General) Regulations 2012

Regulation 15 (2) (d) documentation

Explanation of modifications to policies, after Reg. 14 consultation summer 2014 with:
Relevant bodies, Members of the public and commercial entities.
### Document relevance

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;</td>
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<td>This can be located in Appendix 1 of the Policies [electronic document prefix: (BNF 2)]</td>
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<td>(b) a consultation statement;</td>
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<td>This document See also documents (BNF 10, 11 and 13)</td>
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<td>(c) the proposed neighbourhood development plan; and</td>
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<td>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.</td>
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<td>This document (BNF 9)</td>
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5 | (2) In this regulation “consultation statement” means a document which—

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<td>(a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;</td>
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<td>Consultation statement Part 1: Details of Contacts, Calendar of events &amp; Publicity (BNF 10)</td>
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<td>(b) explains how they were consulted;</td>
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<td>(c) summarises the main issues and concerns raised by the persons consulted; and</td>
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<td>Consultation responses (BNF 11 &amp; BNF 13)</td>
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<td>(d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.</td>
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Introduction

This document sets out the Neighbourhood plan policies, each in turn, as amended following the Regulations 14 consultation stage and other comments received. The Policies set out here were submitted in October 2014 as the original Regulation 15 submission. Please note the policies have since been updated further, following comments from Health check examiner Mr Andrew Ashcroft (See BNF 1 for latest policies). The addendum at the end of this document demonstrates the changes that have occurred between the Reg. 14 version of the plan and the revised Reg. 15 submission, in tracked changes form, for ease of comparison.

In this document, the policy and supporting text are presented first, followed by the dated workings/ changes that were made to the policy / text by the Forum following the Regulation 14 consultation.

Consultation comments that were made and acted upon, where relevant, are listed under “General comments leading the above changes”, “Supporting comments”, “Contrary comments” and “Other comments” as appropriate.

Policies suffixed with ‘obs’ have been superseded by external changes of legislation or events or have been absorbed into adjacent or similar policies.

The explanations for the latest round of changes made following the health check by Andrew Ashcroft can be found in the letter dated February 2015 BNF 16
## Environment Policies

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

Development consisting of new buildings will be considered inappropriate in the Green Belt within Burpham Ward, as shown on the current 2003 GBC local plan proposals map, unless for the purposes listed below:

- 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 or alteration, provided it is not disproportionate to the size of the original building.
- Replacement of an existing building providing it is in the same use and not materially larger.
- Re-use and adaptation of previously developed sites which would not have a greater impact on the openness of the Green Belt.

and where appropriate, in accordance with the other policies contained within this plan.

Note 1: This policy seeks to preserve the essential criteria on which development in the Green Belt should be determined, as set out in the NPPF and the 2003 Guildford Local Plan.

### Background workings of the Forum and subsequent changes made to this policy after Reg 14

From GBC 2003 Policy

- **02/03/14**: The Forum believes there are a number of flaws in the Green belt and countryside study which means that it may not be an appropriate document to be used in the formation of policies. GBC is currently reviewing the evidence base at document level. The forum is actively engaged with key stakeholders on an ongoing basis.
- **09/08/14**: Addition of suffix “B-” to all Policies
- **26/08/14**: First sentence amended - to "considered inappropriate" & opportunities for sport
- **18/05/14**: This policy seeks to preserve the essential criterion on which development in the greenbelt should be determined, as set out in the NPPF, The 2003 Local Plan and emerging Local plan although limited weight can be attached to that document at current time.
Development will be permitted in the Burpham ward metropolitan Green Belt, as shown on the ward map, provided it is for the purposes listed below. New building will be deemed inappropriate.

Within the Burpham Ward metropolitan Green Belt, as shown on the ward map, new building will be deemed inappropriate unless it is for the following purposes:

Comment from GBC planning policy that the current ward map indicates existing greenbelt line while GBC planning policy will not confirm if changes will occur - wording changed to from ’ward map’ to ’GBC local plan proposals map’

Removed - taken form 2003 local plan

Change wording from ”essential Facilities for ” to ’Opportunities for’

General Comment leading the above changes:


Dear Burpham Neighbourhood Forum,

Planning consultation: Burpham Neighbourhood Forum Draft plan Pre- regulation 14 informal consultation

Thank you for your consultation dated 21 October 2013.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have the resources to get involved in all neighbourhood plans and will prioritise our detailed engagement to those plans that may impact on internationally or nationally designated nature conservation sites, and/or require Strategic Environmental Assessment or screening for Habitats Regulations Assessment.

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 Natura 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’).

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. 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.


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: http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/does-a-neighbourhood-plan-require-a-sustainability-appraisal/

Progress of the Local Plan

Natural England note that the Guildford Local Plan has not yet been adopted and that there is therefore potential for the Burpham Neighbourhood Plan may progress before the Local Plan is adopted. The following is offered as general advice which may be of use in the preparation of your plan.

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 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

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.

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

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. 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.

For any queries relating to this consultation please contact Merlin Ash by email at merlin.ash@naturalengland.org.uk or on 0300 060 4271. For all other correspondence, please email
consultations@naturalengland.org.uk, or if it is not possible to consult by email, please send to the above address.

Yours faithfully Merlin Ash Land Use Operations

97: 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.

Supporting Comment:
{date} URS: This policy aligns itself with core principles of NPPF and the Local Plan 2003.
{date} URS: Evidence of consultation process has been published on the Burpham NP website. A survey developed between April and May 2013 which received 378 responses is a good starting point.

96: This policy seems to wholly reasonable sustainable and appropriate for the village

98: Note No SEA required as advised by GBC NPO

156: I agree with this policy

Contrary Comments:
118: …neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies”.

191: 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.

Other Comments:
This policy aligns itself with core principles of NPPF and the Local Plan 2003, which is logical
Evidence of consultation process has been published on the Burpham NP website. A survey developed between April and May 2013 which received 378 responses is a good starting point. However, the engagement should be an on-going process rather than a stop-star series of survey/workshops. In order to demonstrate that Burpham NP is a well-informed plan, the group will need to be able to show that landowners, developers, residents, businesses, service providers have been consulted. We recommend to: 1) Identify key stakeholders and partners and develop working arrangements to gain their involvement and support, 2) Formulate a programme of community engagement, 3) Design and organise different types of engagement activities for a wide range of community groups (e.g., youth, elderly, residents, service providers, businesses, developers)

06/05/14 Your recommendations are noted and Land owners and Business were contacted. One to one meetings with Barton Wilmore representatives of Martin Grant developers and feed back received.
The draft plan has been review by RTPI / PAE, statutory consultees and the local authority. However, there is no clarity whether their comments and advice have been considered.

06/05/14 See amendment actions.

No SA has been carried out. Noted 2/3/14
NDP does not provide details of any analysis. While reference is given generally to supporting studies at the beginning of the document no specific reference is made under each policy approach.
06/05/14 This is not a statutory requirement of a Neighbourhood plan to hold the hand of the reader to prove or disprove a specific policy Item at a specific depth or intensity of proof

There needs to be more specific reference made to the Guildford Borough Green Belt and Countryside Study January 2013, as well as the specific details of the consultation process which took place.

06/05/14 The Survey at the start of the process was specific details of the consultation. Over 2700 people had the opportunity to respond. Including council officials and Land owners and commercial premises in the Ward NPPF and Saved Local Plan policies, however they could also refer to the Guildford Borough Green Belt and Countryside Study January 2013. Saved Policy NE1 of the Guildford Local Plan 2003, policy CP26 of the emerging Guildford Development Framework.

The council have commissioned the Guildford Borough Green Belt and Countryside Study January 2013 to inform their emerging Local Plan. 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 and seek the views of the AONB Partnership. Natural England would also like to see reference to the Thames Basin Heaths Special Protection Area Avoidance Strategy 2009-2014

Yes, this policy repeats policy given in the NPPF and Saved policies from the Local Plan. It doesn’t appear to add anything more. Is it needed in the NDP? Reference should be made to the Guildford Borough Green Belt and Countryside Study January 2013 conducted by the council.

**Policy: B-EN 2: Residential Gardens**

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 inappropriate development of the site would adversely affect the amenities of future occupiers of the site or those currently occupying adjoining or nearby properties.

‘Inappropriate’ means in this case, any development that 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 buildings 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.

Note 1: See Appendix 2 for village character guidance and housing densities

Note 2: ‘Adversely’ means the remaining "undeveloped site size is less than 67% of the overall site size including the buildings.

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

21/05/14 DR: 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.

Stake holder input has been from Residents survey and following analysis of prevailing character and density. The proposed is not a one size fits all as it’s a percentage not a predefined area assessment of housing density.

09/08/14 Addition of suffix “B-” to all Policies
21/05/14 added: ”Note 2 See Appendix 3 for village character guidance and housing densities ”
25/08/14 added Note 3 and rewored Note 1
19/09/14 inserted ’of the site after occupiers in the third paragraph.

This policy supports the protection of residential gardens in accordance with the NPPF in particular it resists inappropriate development of residential gardens, for example where such development would cause harm to the character and layout of the local area.

Note 1: Inappropriate 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 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.

**General Comment leading the above changes:**

{date} View: this policy is designed to ensure that the character of an area remains essentially the same from a street view aspect.

Environmental: Due to the nature of the Soil (Clay) in BurphamWard it has been assessed that Surface water run off and impervious development procedures have caused serious flooding, The one third ratio has been assessed as sustainable in respect of onsite drainage from new developments within existing Housing locations. And the Environmental Agency has applauded this approach.

This ratio also provides for some ‘private outside green space’ for the occupiers of the Home which the study by Exeter Medical School ( ) has shown improves Mental Health.

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. Amend wording to remove NPPF reference.

Permission will not be granted for back garden development where the site makes a 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].

**Supporting Comment:**

In response to concerns over the issue CLG is clarifying the advice in Planning Policy Statement 3, by moving some existing text from the definition of previously developed land (Annex B) to the main body of the document itself. This means that paragraph 41 of the PPS, which explains that brownfield land is the priority for development, will also now say that “there is no presumption that previously developed land is necessarily suitable for housing, or that all of the curtilage should be developed”. PPS3 retains a focus on brownfield land, where this is suitable for housing.
The TCPA also welcomed the move to prevent garden grabbing saying it would "dramatically transform councils' ability to prevent unwanted development on gardens where local people object and protect the character of their neighbourhoods."

142: New development should include sufficient car parking spaces.

95: This policy is sensible and is integral in maintaining the overall ambiance of Burpham.

184: I would support this as there have been a number of inappropriate developments squeezed into positions which have detracted significantly from the surrounding area.

157: I agree with this policy and consider it to be sensible and appropriate.

66: Agree

**Contrary Comments:**
None received

**Other Comments:**

This policy seeks to protect gardens which aligns itself with core principles of NPPF and takes these as the evidence starting point. However there is no evidence at a neighbourhood level to apply the policy as it stands. The neighbourhood forum consultation process involved a residents survey, public meetings, workshops and face to face meetings however there is no specific to explain this policy priority. Documentary evidence is supplied by the objections to planning permissions in the area between Orchard Road and New Inn Lane which have been over ridden by both Council Planning Department and Planning inspectors - these developments have fundamentally changed the character of the area from an average of 15 per hectre to over 54 per hectre.

No reference to consideration of third party comments.

No SA has been carried out.

NDP does not provide details of any analysis. While reference is given generally to supporting studies at the beginning of the document no specific reference is made under each policy approach.

There is no stakeholder or specific technical evidence provided to support this policy, other than at a general level as given in the NPPF.

Refers to the NPPF.

NPPF.

Residential Design Guide 2004, Residential Extensions 2003, Townscape Assessment 2007. Further work is required to specify the features of the character that is considered in need of protection.

No, this policy seeks to introduce a new policy, however further work is required to precisely describe its objectives and intentions.

Evidence is needed to explain how the specific percentages given were derived at for Burpham. Are these percentages already specified in planning policy? If not need to explain (using evidence) how these percentages were arrived at.

21/05/14 It is logical that should gardens be taken for development, that no surrounding property should be jeopardised more than any other in with the intrusion of the new property, hence equidistance from all properties. In respect of 50 % and one third with long large gardens the properties are in the older section of the community, taking more than 50% of any garden substantially changes the character and street scene of the area, while exceeding one third of the plot with the development will also substantially change the
character of the area. There is no hard and fast evidence for either 49% or 51% but some figure has to be laid down as a marker in these circumstances.

Policy: B-EN 3: Public Open Space

The following public open spaces will be protected. Their protection will be further enhanced by their designation as Local Green Space by this policy.

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 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 supporting Zone 3b active flood plain & 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 B-EN6
This area is designated 'Local Green Space' as specified in the NPPF para. 76 -78. This policy enshrines the area identified in appendix 3 as Local Green space in perpetuity.
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 para 76-78.

**Local Green Space Appendix 3 forms part of this policy.**

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

The designations are referred to in the local plan 2003 and the importance of open space was reinforced in the Forum survey results.

{date} URS: The neighbourhood forum consultation process involved a residents' survey, public meetings, workshops and face to face meetings however there is no specific to explain this policy priority. -

2/3/14: Due to low green space in the ward - any and all green space is of continuing importance to residents as pressure over 2.3/14.

09/08/14 Additional of suffix “B-” to all Policies for more development occurs.

19/09/14 replace with: "supporting Zone 3b active flood plain & wetlands designation."

2/3/14 removed text: [PPS9 Biodiversity and Geological Conservation states: Where a Planning decision would result in significant harm to a (site of) biodiversity and geological interests which cannot be prevented or adequately mitigated against, appropriate compensation measures should be sought. If significant harm cannot be prevented, adequately mitigated against, or compensated for, then planning permission should be refused.]

15/3/2014 upgrade policy to make all green areas - local green spaces designation.

18/05/14 deleted Note 1: The village hall is technically and legally a separate entity to the park –

18/05/14 deleted Note 2: Correct legal designation needs to be ascertained for the final draft lan

19/05/14 - Added: See Local Green Space appendix 2

21/05/14 added DR: "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."

19/09/14 remove: "and supports its wetlands designation".

**General Comment leading the above changes:**

5/4/14 The known owners of land to be contacted via letter informing them of the intention to make the plots identified to receive the designation of Local Green Space status.

19/05/14 Due to the complexity of land ownership in Burpham, many developers have title but no interest in various plots of land size access etc - the option to place an advert in both the local Paper and the London Gazette and adjacent to the site to notify people of the intention to classify areas as Local Green space - This exercise will be undertaken following the examination process. Known land owners will be contacted by either Letter or Email.

**Supporting Comment:**

64: Agree
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 greenspace:

Natural England and the Countryside Council for Wales Accessible Natural Greenspace Standard (ANGSt):
No person should live more than 300m from their nearest area of natural greenspace 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 greenspace 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 carparking 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.

**Contrary Comments:**
None received

**Other Comments:**
Refers to current status of each of the open sites specified for protection (including their current designation). These have come from verifiable sources (e.g. local nature reserve, site of nature conservation importance).
The neighbourhood forum consultation process involved a residents survey, public meetings, workshops and face to face meetings however there is no specific to explain this policy priority.

19/05/14: Following numerous face to face discussions over 2 years - all agreed that the Green Spaces of Burpham were ‘worth saving’

No reference to consideration of third party comments

No SA has been carried out.

Refers to several sites and their designation status and/or their particular value. No further evidence presented.

Refers to designations, no stakeholder evidence presented.

Refers to designations for some sites.

Refers to PPS9, but this has been replaced by the NPPF and no longer applies.

Open Space Study. 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 and seek the views of the AONB Partnership. Natural England would also like to see reference to the Thames Basin Heaths Special Protection Area Avoidance Strategy 2009-2014.

Yes, this policy repeats policy given in the NPPF and Saved LP.

If any of the open spaces do not have specific designations, the following could help justify why they should be protected by the NDP: community surveys (to demonstrate their value and use by the community); ecosystem services studies, species studies (to demonstrate how species rich the spaces are etc.).

**Policy: B-EN 4: Local Green Space**

This policy designates important Local Green Spaces in Burpham to be protected in accordance with the Paragraph 76 - 78 of the NPPF.

**New Wildlife corridor Merrow Common and Lane**

The 'new' area designated is from the junction of London Road and Merrow Lane 100 metres at right angles to the centre line of the road towards the North East, then along Merrow Lane until it reaches Merrow Common stream. Then, to form a 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.

**Other Local Green Spaces**

Appendix 3 (Local Green Space Zones) forms part of this policy, which designates areas of land which is demonstrably special as local green space.

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

**Note 1:** Wildlife in and around Burpham - 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.

**Note 2:** Professor Anantha Duraiappah, director of the UN University's International Human Dimensions Programme on Global Environmental Change says the wealth of a country should not just be determined by GNP but should include other factors. "When you wake up to the sound of chirping birds, you are listening to one of the simplest indicators of local environmental health." Our Burpham Bird Life includes over a season, forty bird species. Animals include fox, hedgehog, squirrel, wood mouse, frogs, toads, weasel, vole and newts. Bats are visible on summer evenings. The current health of the...
environment, at a visible level, is good with streams running clear, and very little litter. Sadly the hidden dangers of air pollution are ever present. There has been a 1% increase in Nitrogen Dioxide between 2008 and 2012 at Doverfield Road (source EA). If this level continues for the life of the plan it will be at 25.22 PPM as an annual mean level.

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

21/05/14 title change addition 'New Wild Life Corridor Merrow Common & Lane'

23/05/14 Policy number changed to EN 4

09/08/14 Addition of suffix “B-” to all Policies

28/08/14 Insert the words "and the area known as Copse Edge"

merge with EN3 to form local greenspace policy

21/05/14 Title number changed to EN3a

**General Comment leading the above changes:**

New policy on Local Green Space:

DR: 22/05/14 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]

[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:

3: This policy is in line with Policy 14 & 19 of the emerging local plan & 20/05/14 SEA organised via GBC -Dan Knowles

115: 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).

**Supporting Comment:**

141: I agree with this policy.

143: All the spaces identified are important to the enjoyment of those living in Burpham and as wildlife areas.

93: 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.

186: 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.
104: 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.

158: I agree with this policy and consider it essential that these spaces are protected

63: Agree

65: I strongly agree that green spaces in existing estates should remain and not be built on - reference local Green spaces map.

67: Agree that wherever possible the openness of the greenbelt should be maintained.

94: 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;

Contrary Comments:
None received

Other Comments:
None received

Policy: B-EN 5: Historic Environment

The plan shall protect the visual and heritage amenities of the historic views and historic setting, as described in the Appendix 2 (Character Descriptions of Burpham) 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 7 for full detailed listing

- Sutherland Memorial Park.
- Pimms Row cottages and area.
- St Luke's Church.
- 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 for the respective area of Burpham. The effect of a planning application on a non-designated heritage asset should also be taken into account when determining the application.

Appendix 2 & 7 form part of this policy.

Note 1: For full listing of Historical and Heritage assets in Burpham please refer to Appendix 7, cross referring to the latest listing from Surrey Heritage centre at

Burpham Consultation statement - part 3 of 4 – February (a) 2015
Page 18 of 60
Background workings of the Forum and subsequent changes made to this policy after Reg 14

2/3/2014: text amendment to "Planning proposals are expected to have due regard to the character assessment allocated to the individual locations"

2/3/2014: text amendment changed words from 'view' to 'setting' to align with planning terminology

15/3/2014: 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.

09/08/14 Addition of suffix “B-” to all Policies

24/05/14 Policy number changed to EN 5

21/05/14 added "See appendix 5"

03/05/14 added: "Described in the character assessment appendix of this plan"

21/05/14 added: "Permission will be granted for development that conserves and enhances the following Listed Buildings and their settings:"

21/05/13 added: "For full listing of Historical and Heritage asset in Burpham please refer to appendix 5"

21/05/14 deleted as appendix five covers details "21/05/14 added DR: "Permission will be granted for development that conserves and enhances the following Listed Buildings and their settings:"

21/05/13 added in Policy Notes existing text deleted.: "For full listing of Historical and Heritage asset in Burpham please refer to appendix 5"

General Comment leading the above changes:

EN4: Public Open Space DR: 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. Rivers die 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. 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.

62: 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.

Supporting Comment:

URS: These buildings are listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 and are therefore verifiable.

92: 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.
159: I agree with this policy and consider it essential that this historic environment is preserved

**Contrary Comments:**
None received

**Other Comments:**
5/4/14 photographs required of all locations designated as historic features. Refers to listed building designations, to justify the policy, although as the draft notes, some designations are still to be confirmed. These buildings are listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 and are therefore verifiable.

The neighbourhood forum consultation process involved a residents survey, public meetings, workshops and face to face meetings however there is no specific to explain this policy priority.

No reference to consideration of third party comments.

No SA has been carried out.

Refers to listed buildings and designations- is this being used as the evidence base to demonstrate why views should be protected? Policy wording is currently unclear.

Refers to listed building designations, but no reference to stakeholder evidence.

Listed buildings designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Reference to buildings being listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

Landscape Character Assessment, contacting the Historic Environment Record (HER) to get an appraisal of all the heritage assets within the plan area for more information. Conducting a Heritage Character Appraisal of the area.

No, this policy seeks to introduce a new aspect in order to protect historic views. It is not clear how this would be achieved at a local level. Should the policy list the specific viewpoints (within the NDP area) that are to be protected? If so, reasons and evidence must be provided to justify each viewpoint to be protected.

Further information would be needed to explain how the historic views would be protected and how they were identified. A characterisation study or an assessment of community heritage assets could help to identify important sites and landscapes.

**Policy: B-EN 6: Natural Features**

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.
Note 1: This policy is designed 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 Guildford.

Note 2: See Appendix 2 for full character descriptions.

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

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.

In Burpham we have the 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 ANOB of the Surrey Hills.

**09/08/14 Addition of suffix “B-” to all Policies**

This policy protects these views. Detriment to them will only be permitted for strategic purposes.

**24/05/14 Policy number changed from EN5 to EN6**

**18/5/14 Deleted: This policy protects these views. Detriment to them will only be permitted for strategic purposes.**

**General Comment leading the above changes:**

[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]

**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.

**Supporting Comment:**

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

160: I agree with this policy which preserves these historic natural features

**Contrary Comments:**

None received

**Other Comments:**

Aligns itself to the NPPF. Refers to a Guildford Borough Council landscape character area assessment which demonstrates key attributes to help justify why views should be protected.
The neighbourhood forum consultation process involved a residents survey, public meetings, workshops and face to face meetings however there is no specific to explain this policy priority.

No reference to consideration of third party comments.

No SA has been carried out.

Refers to landscape character assessment and attributes of these areas as reason to protect views.

Refers to landscape character assessment- but no reference to stakeholder evidence. Has evidence been assembled for each of the views to explain why they should be protected? This is not clear.

Landscape character assessment.

NPPF

Historic Parks and Gardens Gazetteer, Landscape Character Assessment 2007, 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.

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

Is this policy seeking to protect views of the assets listed? or protect the assets themselves- not clear. If the policy is to protect assets listed: where sites are already designated (e.g. the Landscape Character Area) this policy would repeat existing policy which seeks to protect landscape and natural features. The policy also seeks to register a new designation. The plan can identify on a map green areas for special protection (Local Green Space) and should liaise with the council and relevant environmental bodies.

Yes, there are evidence gaps to support the element which seeks to register a new designation. The plan can identify on a map green areas for special protection (Local Green Space) and should liaise with the council and relevant environmental bodies. The National Planning Practice Guidance (NPPG) states: "The Local Green Space will need to be consistent with local planning for development in the area". More information about Local Green Spaces is available at: http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-green-space-and-rights-of-way-2/local-green-space-designation/ (Open Space section of the NPPG).

**Policy: B-EN 7: Adapting to Climate Change**

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); where appropriate.
• Support Solar Energy Systems on roofs, 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 on a sound barrier along the A3 in the area.}

Note 1: See survey results

Background workings of the Forum and subsequent changes made to this policy after Reg 14

5/4/14 minor adjustments to wording of the text.
27/05/14 Policy change from en 7a to En7
09/08/14 Addition of suffix “B-” to all Policies
25/08/14 add "and mitigating" to title & ad bullet "Support of Solar Energy Systems in Roof when not in conflict with Character or other policies."

General Comment leading the above changes:
None received

Supporting Comment:
161: I agree that any development in Burpham should be done in the most environmentally sustainable manner possible
61: Agree

Contrary Comments:
None received

Other Comments:
No reference to specific evidence or existing policy. This policy seeks to achieve high standards of sustainable development by reducing use of fossil fuels, efficient use of natural resources, adopt low and zero carbon technologies and best practice in sustainable urban drainage.
The neighbourhood forum consultation process involved a residents survey, public meetings, workshops and face to face meetings however there is no specific to explain this policy priority.
No reference to consideration of third party comments.
No SA has been carried out.
The NDP does not provide analysis of any evidence.
No technical or stakeholder evidence presented.
No documented evidence has been presented.
No reference to policy.
Builds and adds to Policy G1 (9 of
The Guildford Local Plan 2003
Refer to the Sustainable design and construction supplementary planning document.
Future Development Policies

Policy: B-FD 1: General Development Standards

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

Appendix 2 is part of this policy.

Note 1: Burpham residents have experience of extremely high density estates (two level accommodation) and the instance of highly stressful living has been described in the survey using the terms “Dormitory area” “Claustrophobic” “Gulag”, “Over bearing”, “No room to swing a cat” “I can see inside my neighbours bedrooms”, along with “The inability to put a normal sized car in the garage” are just some of the comments on high density living, from the survey, while those living in low density areas have described their life as ‘delightful’ ‘pleasant’ and ‘no better place to live.’ The plan aims to prevent future stressful unhealthy living accommodation by ensuring a balance between land cost and housing density.

Note 2: National Planning Policy Framework (NPPF) was adopted in March 2012, The NPPF (para. 47, bullet point 5) states that to boost significantly the supply of housing, local planning authorities should (amongst other things) set out their own approach to housing density to reflect local circumstances.

Note 3: Latest SHLAA GBC 2013 demonstrates sufficient land in the Borough, to enable an innovative use of land to meet housing requirements.

Note 4: Character descriptions of Burpham ward is attached as appendix 2 to the Neighbourhood Development Plan.

Background workings of the Forum and subsequent changes made to this policy after Reg 14

The only document we have is the Landscape Character Assessment:
http://www.guildford.gov.uk/landsapecharacterassessment

15/3/2014 New Title: General development standards.
15/3/2014 additional text: scales in "harmony" with existing character "of its location within the ward."
19/05/14 added to supporting Text : "Note 4: Character descriptions of Burpham ward is attached as appendix 3 to the Neighbourhood development plan."
21/05/14 added "Development will be permitted where it complements and enhances the character of the local area." from DR comments

09/08/14 Addition of suffix “B-” to all Policies
19/09/14 replace note 3: to enable an innovative use of land to be used See Policy B-FD7
15/3/2014 old title: The Built Environment
18/05/14 Delete from Notes "an oversupply"
19/09/14 Delete: a reduction in the density from 40 Per Hectare proposed in the document to 35 per hectare in Burpham, which will not detrimental to the overall land supply requirement in Guildford Borough.

**General Comment leading the above changes:**
The Townscape character area - assessment covers parts of Burpham.
Extracts in Appendix D Character area lower Wey rural- urban fringe

Townscape Character Area.
4C: Burpham Village
8F: Burpham
9D: Burpham Common

Policy: FD1b - Density of new build [within the current building line of the ward]
This policy remains in line with Policy EN2a ensuring that homes do not overlook each other and maintain privacy
Energy-efficient standards of new buildings will need to be in accordance with policy EN7. Open public green space will have to be incorporated where practicable.
Wherever possible brown field sites shall be used for development. Adequate measures for dealing with flood prevention, surface water, and sewage drainage shall be required in all new developments.

**Supporting Comment:**
URS: Standard planning policy- no further evidence required if kept general and not Burpham specific.
5/4/14 The policy respects the views expressed in the survey to maintain the general appearance of the built community which many felt as a comfortable living environment. It also closely follows the GLP policy G5(1) OF THE 2003 Local Plan
87: 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
207: Pleased for the support. GBC
166: I agree with this policy as high density development contributes to stressful living and should be avoided.
57: Agree
166: I agree with this policy as high density development contributes to stressful living and should be avoided

**Contrary Comments:**
128: which is considered to be unduly restrictive.
99: 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).
**Other Comments:**
The Forum has generated its own Character assessment and is amended the plan as Appendix 3. No reference to evidence or existing policy. This policy states: The New built form including extensions will need to promote designs and scales compatible with existing character.

19/05/14 - See Burpham character appendix 2
Reference to public consultation.
No reference to consideration of third party comments.
No SA has been carried out.
No analysis of evidence presented.
19/05/14 - Common sense.
There is general support given in the NPPF and Local plan. The NP refers to a Public Event and back ground survey conducted in July 2013.
No documented evidence has been given.
No reference to policies.
Standard planning policy- no further evidence required if kept general and not Burpham specific.
This is standard planning policy and repeats policy given in the NPPF and saved policies of the Guildford Local Plan 2003. Is there a need for the policy to also be included in the NDP? If so, could it be made more specific to Burpham?
19/05/14 The GBC local plan has emerged in its first format with central government changing planning conditions on a monthly basis it is better to keep it broad based.
If the policy is to be made more Burpham specific, further evidence will be required to help justify it.

**Policy: B-FD 2: Dwelling Density and Land Use**

<table>
<thead>
<tr>
<th>Dwelling density will be based on plot size.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing: The footprint of each new house /dwelling must not exceed 33% of its allocated plot size.</td>
</tr>
<tr>
<td>Flats: Must have access to private open space which has a minimum space equivalent to twice the External floor area of each flat.</td>
</tr>
<tr>
<td>All residential development must include 4m² allocated space for recycling / refuse storage.</td>
</tr>
<tr>
<td>In the case of flatted developments unless central recycling is provided then a reduction of 3m² will be permitted for each flat.</td>
</tr>
<tr>
<td>Sheltered and assisted dwellings: Shall have the equivalent ratio of communal open space.</td>
</tr>
</tbody>
</table>

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

05/04/14 Housing: The footprint of each new house /dwelling must not exceed 33% of its plot size.
09/08/14 Addition of suffix “-B” to all Policies
25/08/14 Add word 'External’ before floor and 'Allocated’ before plot, and the sentence: "within the elements of 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”

Housing paragraph changed

General Comment leading the above changes:
None received

Supporting Comment:
81: I agree with this strategy.
190: This appears to be a wholly rational approach
172: I agree with this sensible policy

Policy: B-FD 3: Mixed Housing

This policy supports residential development that provides for one and two bedroom properties, particularly with shared equity options of ownership.
This not only reflects the requirements of the younger generation who need starter homes but also other groups such as single and elderly people, as identified within the survey.
Any new housing stock should be of a size and proportion which maintains the characteristics of the community in accordance with Policy FD1.

Note 1: The figures to justify this policy by the respondents of the survey are held in the age groups statistics of the current housing waiting list of Guildford Borough Council.

<table>
<thead>
<tr>
<th>Age range</th>
<th>Total</th>
<th>%</th>
<th>2011 Census %</th>
<th>Total</th>
<th>%</th>
</tr>
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<td>3.7</td>
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<td>21 to 24</td>
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</table>

Figures 2012 -2013
Age
Analysis of the housing applicants by age provides the following breakdown: census data included for comparison.
Those seeking help from Council as they were homeless or at risk of imminently becoming homeless in 2012-13.
Council Lettings by Age
The age of the main or first named applicant rehoused in Council accommodation.

Note 1: The figures to justify this policy by the respondents of the survey are held in the age groups statistics of the current housing waiting list of Guildford Borough Council.
<table>
<thead>
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<th>90 and over</th>
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<th>0.9</th>
<th>0</th>
<th>0</th>
<th>90 and over</th>
<th>4</th>
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<tbody>
<tr>
<td>total</td>
<td>3700*</td>
<td>100</td>
<td>100</td>
<td>614</td>
<td>99.9</td>
<td>274</td>
<td></td>
</tr>
</tbody>
</table>

Background workings of the Forum and subsequent changes made to this policy after Reg 14
09/08/14 Addition of suffix “B-“ to all Policies
07/09/14 Added: Development that provides for one and two bedrooms with shared equity preferable. This not only reflects the requirements of the younger generation who need starter homes but also other groups such as single and elderly people, as identified within the survey.
Any new housing stock should be of a size and proportion which maintains the characteristics of the community in accordance with Policy FD1.
07/09/14: Title changed to "Mixed Housing"
07/09/14 Removed: 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.
07/09/14: Title Changed From: Support for Younger People

**General Comment leading the above changes:**
None received

**Supporting Comment:**
19/05/14 Currently several houses are being built as part of a back garden grabbing campaign snatching some of the last back gardens in the community suitable for development during the writing of this document while promoting low cost housings in public, All housing on this development will cost in excess of £1,100,000 .
84: 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.
169: I agree with this sensible policy
54: This point is well made and very important.

**Contrary Comments:**
None received

**Other Comments:**
The NDP states it is awaiting housing waiting list statistics to use as evidence for this policy.
No reference to stakeholder evidence- this could be used to help justify this policy.
No reference to consideration of third party comments.
No SA has been carried out.
Refers to Planning Contributions Supplementary planning document and how high land value can usually support 35%- no reference to how this links to Burpham- are there high land values here? This would help reinforce the evidence and argument presented.
No reference to stakeholder evidence. States that a request has been made for housing waiting list data from GBC. Refers to Planning Contributions supplementary planning document.

No documented evidence has been given (awaiting housing waiting list data from GBC).
No reference to policy.

Guildford Borough Council Housing Needs Assessment 2013: provides a break down of numbers of people in each household - it also lists the proportions of people living in households who will soon be seeking to move to a new dwelling and start a new household themselves (often young people). Land values data- could help link into the argument for

35% affordable housing in areas of high land value.

19/05/14 The New Draft LP has set the number at 40% affordable - this level is placing affordable housing on the extreme knife edge of viability considering the newest houses to get planning permission in Burpham will be placed on the market at £1.1 million.

New policy, with NDP area specific figure (higher than that quoted within the Guildford Local Plan 2003)

Need to provide evidence to demonstrate the need for affordable and accessible housing for young people living in Burpham. Could this policy and policy FD5 (housing requirements) be merged? They cover very similar issues. Further evidence needed to justify the higher % allocation of affordable homes than that stated in the neighbourhood plan - could link this in with land values to reinforce the policy.

**Policy: B-FD 4: Improvements to General Infrastructure**

New development will be expected to demonstrate during the planning process, appropriate levels of infrastructure to support the development. Guildford Borough Council and Surrey County Council are encouraged to request suitable financial contributions to fund improvements to local infrastructure. Such improvements should include:

- Reducing traffic congestion, providing disabled friendly footpaths, and measures for the reduction of noise pollution for the community as a whole.
- Ensure any location generating noise is treated as a blight on the community and action taken to reduce this problem when planning new infrastructure.
- The need for infrastructure and 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.

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

09/08/14 Addition of suffix “B-” to all Policies
13/08/14 - Reducing Traffic Congestion
General Comment leading the above changes:
70: 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!
155 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.

Supporting Comment:
Guidance: Thames Water, as the water ‘authority’ for Burpham recommend that developers engage with them at the earliest opportunity to establish compliance with the above policy
83: 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
187: 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
103: I can confirm that we have no objections or other comments on the plan. Highways Agency.
170: I agree with this sensible policy
53: Agree

Contrary Comments:
None received

Other Comments:
This policy refers to new development expected to demonstrate appropriate levels of infrastructure by suitable financial contributions (CIL) to fund improvements to local services. Refers to case history.

No reference to stakeholder evidence- this could be used to help justify this policy.
No reference to consideration of third party comments.

No SA has been carried out.

Analyses the case history to demonstrate how new developments are not always accompanied by the necessary community facilities.

No reference to stakeholder evidence, but does make reference to case history.

Refers to case history

No reference to policy.

This policy could be made more specific to Burpham. Could list specifically the type of infrastructure the group would like to see. Would suggest a community infrastructure assessment to identify what is needed in Burpham - these infrastructure issues could then be listed within the policy. Consultation responses from the NDP consultation process, Guildford Borough Infrastructure baseline which assesses the quality and capacity of existing infrastructure in the Guildford area.

Could it be made more Burpham specific? The policy could focus on using CIL monies to address infrastructure issues causing problems specifically within Burpham. This will make the policy more Burpham specific.

Guildford Borough Infrastructure Baseline to help justify what the CIL monies are to be used for in the NDP.

19/05/14 The infrastructure base line fails to include noise reduction in the Infrastructure relevant to Burpham - the assessment was flawed in that the Noise ceased on the A3 south of Clay lane and failed to include the London Road slip Properties which have no protection from Noise levels

**Policy: B-FD 5: Water Supply & Sewerage Infrastructure**

<table>
<thead>
<tr>
<th>Approval for new residential units will be granted, subject to other policies in this plan, after the applicant has demonstrated that all the following are met:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Demand for water supply and water network infrastructure, both on and off site, can be met.</td>
</tr>
<tr>
<td>• Demand for sewage treatment and sewage network infrastructure, both on and off site, can be met.</td>
</tr>
<tr>
<td>• The surface water drainage requirements and flood risk of the development, both on and off site, are satisfied.</td>
</tr>
</tbody>
</table>

Note 1: 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 in writing what improvements are required.
Note 2: 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.

Note 3: see appendix 6 (Water & Flooding) regarding water levels and Sewer Capacity.

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

09/08/14 Addition of suffix “B-” to all Policies
13/08/14 Policy Number ammended to B-FD6
25/08/14 added the wording ’in writing’ Note 1 & added Note 3: see appendix 8 re water levels and Sewer Capacity,

Policy Number FD 5a

**General Comment leading the above changes:**

52: 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.

**Supporting Comment:**

82: 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.

116: 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.

145: 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

188: 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

171: I agree with this sensible policy

108: 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 scourds the stream obliterating any life in the water.

**Contrary Comments:**
None received

**Other Comments:**
This policy seems to be more supplementary guidance than land use planning policy.

### Policy: B-FD 6: Green Man Site

The results of the Survey indicate that most of those who completed the survey 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 small site with the traffic and parking problems it will bring.

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

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 other policies in this plan.

### Background workings of the Forum and subsequent changes made to this policy after Reg 14

15/3/2014 notification of planning permission granted for A1 retail February 2014
09/08/14 Addition of suffix “B-” to all Policies
15/3/2014 no change in original test plus additions

**General Comment leading the above changes:**
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).

**Supporting Comment:**
Look for evidence to support the need for a community facility on the site as 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]

168: I agree with this policy as a place of refreshment has existed on this site for centuries and a supermarket is unnecessary and inappropriate

55: 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.

**Contrary Comments:**
None received

**Other Comments:**
85: 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

Refers to the latest traffic predictions report from Guildford Borough Council. Also refers to a study conducted by Guildford Borough council which shows most appropriate uses for the site.

Refers to community not wanting a supermarket on the site- but does not state if this was part of the consultation process for the neighbourhood plan. If this was part of the consultation process, this should be stated to back up the statement.

19/05/14 The seven surveys carried out in the community all have an 80% aversion to the use of this site for such an endeavour, Traffic and congestion being sighted as the main reasons for rejecting the planned store.

No evidence of consideration of third party comments for this site.
No SA has been carried out.

NDP does not provide analysis of community consultation responses. NDP does refer to future traffic predictions and a site survey undertaken by Guildford Borough Council.

States that the community do not want the development- not clear if this is an assumption made by the forum or if this emerged from consultation during the draft neighbourhood plan or through consideration of local objection letters received for the development. Refers to traffic predictions and Guildford Borough Council site assessment.

Refers to traffic predictions report and site assessment by Guildford Borough Council. Also notes that current community centres/halls are overprescribed to help demonstrate that the site should be used for a community facility. Does not quote any figures to demonstrate the degree to which these community facilities are oversubscribed.
No reference to policy.
Policies related to new shops: Saved Policy S9 of the Guildford Local Plan 2003 or if the development is outside the Burpham Shopping centre saved Policy S10. Population data could also be used to demonstrate a need for more community facilities.

19/05/14 - It is an acknowledged fact Burpham has one Medical Doctor for over 5000 patients - most travel to Merrow Kingfisher Drive which is unsustainable for the Disabled and the medically unfit. The communities largest community gathering place can hold less than 100 people (50 couples) with 5000 in the community clearly this is unacceptable if a community is to coeless

Does not repeat local or national planning policy as it is site specific. Would recommend making this policy less site specific and instead focus on setting the criteria to be used when considering new retail developments within the town. This would help avoid the type of issues experienced on the Green Man site within other sites in Burpham in the future. The NDP could use saved Policy S9 and/or S10 as a foundation, then build upon it to make it Burpham specific.

States that the policy supports a family friendly café-or licensed restaurant, but provides no evidence for the need for such uses. Evidence is needed to justify this aspect of the policy. Limited reference to public consultation- could state if this was identified as an issue during consultation for the NDP. Is there any evidence to suggest that there is no need for another shop in Burpham? Has a retail assessment been done by council to show what retail uses the area is lacking or has enough of?

19/05/14 The retail study identified shortages of retail supply in other locations in the Borough but not shortage was identified in Burpham.
Employment Policies

Policy: 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 criteria is satisfied.

There are many examples of this practice occurring already. With the ubiquity of high-speed broadband, working from home will increase. There are practical benefits to the community, including reduced need for travel, and more possibility of wage-earners collecting children from school.

Background workings of the Forum and subsequent changes made to this policy after Reg 14

09/08/14 Addition of suffix “B-” to all Policies
5/4/14 Minor amendments, plus Delete: Larger new homes (3 or more bedrooms) will be expected to have an area designated as a study location on the plans.

General Comment leading the above changes:
At present the policy is too vague although the general aim of supporting people working from home is good and appropriate. Work needs to be done in terms of how planning policies can promote this key NDP aim.

Supporting Comment:
80: In a work environment of Hyper Mobility is becoming the norm home working is becoming is an important feature of a sustainable environment.
173: I agree with this sensible policy

Contrary Comments:
None received

Other Comments:
No reference to evidence.
No reference to stakeholder evidence- this could be used to help justify this policy.
No reference to consideration of third party comments.
No SA has been carried out.
No analysis of evidence presented
No reference to stakeholder or technical evidence to justify this policy.
No documented evidence has been given.
No reference to policy.
Need to set out the criteria that a planning application would have to meet if submitting an application for live/work.
No repeat of existing policies.
This policy is currently quite vague with no reference made to how planning mechanisms could deliver the policy. This policy could be made deliverable by amending the wording. For example, stating instead that new developments should be designed to facilitate working from home (e.g. appropriate broadband provision etc.). Could set out specific criteria and states that home working will be supported if the residential element complies with the council’s standards on dwelling and room sizes and other residential amenity standards and a separate floor area is allocated to workspace. Evidence of current levels of internet connectivity and speed could be useful.

**Policy: B-EMP 2: Shopping Parades**

The loss of any ‘A’ use class or D1 or D2 use class 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 firstly for A1 - A5 use for 18 months or D1 or D2 use for a further six months, prior to application for change of use. London Road and Kingpost Parades conform to the definition of “Local Shopping Parades” serving the local area. Many trips are made on foot as these Parades suffer severe parking problems.

London Road and Kingpost 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 accessing financial and professional services 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 superstores.

Outside the designated shopping parades, Sainsbury's Supermarket is a major supplier of foodstuffs to the community and surrounding area. 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.

Note 1: Case Study Reference: Communities and Local Government - Parades of Shops – “Towards an Understanding of Performance & Prospects” document

Note 2: The case studies serve to confirm a clear local policy focus on supporting the retention and ongoing viability of neighbourhood parades, with a diverse and complementary occupier mix, providing essential goods and services which are, in most cases, highly valued by the local communities they serve.
Note 3: The Central government description within the NPPG /NPPF fails to acknowledge the Burpham scenario, where a food store within the centre of the residential community is situated a short distance from what it has defined in NPPF as the ‘local shopping centre’, meaning it is ‘in the centre of the residential community’ but ‘out of centre’ to the remaining shops.’ This anomaly means in effect a double local centre exists for our community - as product range in the ‘out of centre store’ is greater than the whole of the ‘local centre’ by item, separated by a Local Green Space of Sutherland Memorial Park.

Background workings of the Forum and subsequent changes made to this policy after Reg 14

09/08/14 Addition of suffix “B-” to all Policies
26/08/14 Note 3 added re-GBC 213: para 3.86
5/4/14 text moved to notes: The case studies serve to confirm a clear local policy focus on supporting the retention and ongoing viability of neighbourhood parades, with a diverse and complementary occupier mix, providing essential goods and services which are, in most cases, highly valued by the local communities they serve.

General Comment leading the above changes:

Neighbourhood parades occur in a variety of settings, typically secondary in terms of trading location (compared with town centre and purpose-built out-of-centre facilities). Proximity to a defined local catchment or the potential to draw passing trade through high visibility are typical characteristics of neighbourhood parade locations. As such, parades are found, variously, on radial routes between centres, embedded in the fabric of dense housing estates across urban areas and in more rural locations serving local needs.

Neighbourhood Planning offers an important opportunity for neighbourhood parades to be positioned as key drivers of economic sustainability, local housing markets and community cohesion.

Given the important role that neighbourhood parades can clearly perform in the life of local communities they are likely to feature regularly in responses to local consultations on attitudes to local futures. Their role as a ‘barometer’ of local socio-economic health and as a social as well as economic asset, should mean that local planning processes should have due regard to supporting parades as far as possible.

Of course not all parades will remain viable indefinitely – but the evidence from the case studies suggests that, in many circumstances, there continues to be locally-driven demand for units in parades alongside the ongoing expansion of multiples, albeit on a selective basis.

In some large-scale housing estates, particularly in the sub-urban areas of larger towns and cities, there is a legacy of numerous small parades which lack the critical mass to secure long term viability and move from being, in our terms, ‘neighbourhood parades’ to ‘neighbourhood hubs’. This may point to the need for a more planned approach to the growth and managed decline of the existing, historic pattern of parades to arrive at a more sustainable balance of provision, including higher order and lower order parad / hubs.

The future pattern of retail and service provision at the neighbourhood level will be driven by economic realities but judgements on how this could be planned and influenced through policy interventions should be informed by effective consultation with local communities and should form part of neighbourhood planning
processes. This will ensure that communities understand the rationale for any planned changes in provision and that the function and form of neighbourhood parades going forward fully reflect the reality of local economic circumstances as well as local needs and views.

257: 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.

**Supporting Comment:**
Section to be re-assessed for technicalities of the Buildings classification system

79: In an increasing homogenous shopping environments it is important to have local facilities and essential amenities for the village to access

174: I agree with this policy as shopping parades provide a viable alternative to mainstream supermarkets

**Contrary Comments:**
None received

**Other Comments:**
No reference to specific evidence gathered to help shape this policy. Makes reference to shopping parades in general, but no specific evidence in this general block of text below the policy.

Does not refer to stakeholder based evidence. Was this an issue identified during the consultation process for the NDP?

No reference to consideration of third party comments.

No SA has been carried out

No analysis of evidence presented

No technical or stakeholder evidence presented.

No documented evidence has been given.

No reference to policy.

If going to specify the types of uses preferred after the 18 month period has elapsed, should assess what is needed in Burpham (e.g. community facilities, for what age group etc.): Guildford Borough infrastructure baseline (which highlights gaps in infrastructure provision).

This policy is contradictory to the recent permitted development changes so need to change the wording. This is a difficult issue to address and planning policy can't be used to resist change. The policy should be amended to reflect this. Could look to the wording in the Thame Plan for some guidance (although produced before permitted development rights were amended to allow more changes without the need for planning permission)

Policy should be amended as contradictory to recent permitted development changes. Could this policy be further tailored to Burpham, stating, for example the types of uses it would like to see? Suggest assessing more specifically what is needed in Burpham, to help safeguard against a use that the community does not deem necessary in Burpham- number and type of, and distance from, facilities, concerns of locals regarding service provision.
Policy: 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 class use for 18 months prior to application for change of use or re-development.

Any change of use must be accompanied by full justification of need and be in compliance with normal development control criteria. This policy is subject to permitted development rights in force at the time a planning application is made.

Business accommodation within Burpham is extremely restricted in that only three existing locations have been identified in London Road, New Inn Lane, and Burpham Lane – as Burpham is predominantly residential with the majority of the community leaving the ward to work – protection of the remaining premises for local use by local business is paramount.

Background workings of the Forum and subsequent changes made to this policy after Reg 14

15/3/2014 Change: Commercial inserted in place of Office
15/3/2014 added: "Any change of use must be accompanied by full justification of need and in compliance with normal development control criteria."
15/3/2014 added: "actively and prominently" marketed for B
15/3/2014 added: "This policy is subject to current permitted development rights in force at the time of application"

09/08/14 Addition of suffix “B-” to all Policies
15/3/2014 Office deleted in title
15/3/2014 Class B1 changed to B
03/05/14 change title "Loss of Commercial " deleted Business added.
26/08/14 Note 1: Delete "Office" and replace with "Business"

General Comment leading the above changes:

15/3/2014 Tighter wording needed.
15/3/2014 Survey of commercial premises carried out by the forum, no responses received.

Supporting Comment:

What is the designation of the Kingpost parade? It’s a Local Shopping Centre.
15/3/2014: the Employment Land Assessment (ELA) document identifies a short fall of employment B class Land over the period 2013 to 2031 for the borough as a whole.
78: 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.
175: I agree with this policy as preservation of business premises is essential
51: Strongly Agree
**Contrary Comments:**
None received

**Other Comments:**
Notes that office accommodation in Burpham is extremely restricted.
Does not refer to stakeholder based evidence. Was this an issue identified during the consultation process for the NDP?
No reference to consideration of third party comments.
No SA has been carried out.
No analysis of evidence presented
No technical or stakeholder evidence presented.
No documented evidence has been given.
No reference to policy.
Policy needs to be in line with permitted development rights and change of use legislation (including May 2013 amendments). Once in line- the policy could be made more Burpham specific by stating what other uses would be preferred once the 18 month time period has elapsed- this could give Burpham more control to help guide the types of uses within the area- evidence to help: Guildford Borough infrastructure baseline (which highlights gaps in infrastructure provision).
This policy is contradictory to the recent PD changes. NDP would have no control over this type of change of use (from B1a offices to other).
This policy is contradictory to the recent PD changes. NDP would have no control over this type of change of use (from B1a offices to other). Could suggest alternative uses preferred in this area.
**Transport Policies**

**Policy: B-T 1: Parking Standards**

All new developments within Burpham shall provide parking within its designated land boundaries or nearby ‘off the public highway’ to meet the expected demand of the development, without requiring the use of public roads and access points as overflow parking. Car parking and garages must be of sufficient size to accommodate the size of modern vehicles. 2.6m by 6m or 2.6m by 7m if parallel parking.

The preference is for assigned parking spaces within the curtilage of the application site.

Houses other than sheltered accommodation and studio apartments must provide cycle storage at the rate of two cycle places per first bedroom and one per additional bedroom, 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 Standards (minimum)**

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

**Visitor Parking:**

All parking for residents must be provided ‘off road’. Provision will be made for on-road parking adjacent to the properties for visitors and delivery vehicles to safely rest at the kerb side for the duration of their visit to the location.

**Non-residential Parking**

Parking on non-residential sites shall not be below the prevailing maximum standards in use by Guildford Borough Council. Due to the high car usage identified in the 2011 census within Guildford Borough and surroundings, commercial parking requirements within Burpham will require the maximum predicted use (during the planning application process) to be met on site.

*Note 1: Parking standards are designed to prevent on-street parking which has proved unsustainable in Burpham due to the narrow lanes and roads. It prevents public transport and emergency vehicles entering estates and should be discouraged at the design stage.*
Note 2: To encourage sufficient storage for family cycles in each home.

Note 3: Provision lower than that set out above shall be avoided unless clear exceptional circumstances can be justified by the applicant.

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

- 09/08/14 Addition of suffix “B-“ to all Policies
- 09/08/14 on final publishing remove GBC and SCC parking 'amounts'

**General Comment leading the above changes:**

Policy T1: Parking standards –

In Burpham there is a high car to home ownership ratio of 1.67 or 1.8 in car owning homes only and in some cases as many as five cars per household – (details from 2011 census). While it is aspirational to reduce car ownership in favour of other transport methods, it is unrealistic and unachievable in short to medium term. The forum survey demonstrated work patterns and distance travelled from Burpham to work and the previous practice of under providing of parking in new developments, simply causes congestion and parking problems within both old and new developments in the ward – To prevent these problems being exacerbated by further new development following this under provision practice this policy requires new developments must provide off street parking to meet the needs for all residents and employees.

Parked space on residential development must meet the following minimum standards; if any property meets these minimum standards any amendments to the property via a planning application must be maintained

The NPPF now states at paragraph 39 that ‘If setting local parking standards for residential and non-residential development, local planning authorities should take into account: the accessibility of the development; the type, mix and use of development; the availability of and opportunities for public transport; local car ownership levels; and an overall need to reduce the use of high-emission vehicles.’ The Burpham parking standards has done this.

Parking provision on modern developments often leads to a significant under provision of parking spaces as previous Governments have sought to encourage alternative modes of transport. This has led to high levels of on-street and pavement parking, which residents are keen to avoid in the future. In January 2011 the Governments chief planner wrote to local authorities informing them that the Government was removing the ‘maximum’ requirement from central guidance on this issue. Policy T1 is the result of careful consideration of available evidence on residential parking trends in Burpham with specific emphasis on the current availability of public transport and local car ownership levels.

Previous parking standards have proved inadequate in the past, resulting in a parking requirement deficit of over 1000 spaces off road in Burpham.

**Supporting Comment:**

From Direct Line report 4th December 2013: Having two cars on the driveway used to be the traditional hallmark of the affluent middle-class family. But more than 2.2 million households now have four or more cars. Some 1 in 17 homes (six per cent) now have at least four cars on the driveway belonging to both parents.
and offspring. Nearly half of all households (47 per cent) have two cars. But another 16 per cent have three cars at the same home. By contrast, fewer than one in three people (30 per cent) belong to ‘single-car households’.

Rob Miles, head of car insurance at Direct Line said: ‘Around seventy per cent of motoring households have more than one car, and with more people living with their parents into their twenties this could increase even further.’

He added: ‘We are witnessing a growing trend of multi-car households where couples drive vehicles with the same sized engine as their partner's vehicles, and sometimes even an identical model.’

**Contrary Comments:**

105: What you are proposing in the plan seems to underestimate the demand.

151: Cars will always be with us and it is essential that we provide adequate parking with new housing and with new facilities.

193: 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.

From DR: suggested amendment: 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:

21/05/14 commentary: This would mean that parking would continue to plague footpaths and roads causing Blockage for public transport and emergancy vehicles - one bus route has been altered in the past 3 years due to a claim that buses were unable to transit the routes with safety. In respecto of cycle parking standards the GBC standard of one per household is irrational for five bedroom houses. Hence our own need assessment.

12/08/14 - from CE - 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.

125: MGH considers the Burpham parking standards to be overtly onerous and recommends that these are amended.

**Other Comments:**

105: What you are proposing in the plan seems to underestimate the demand.

151: Cars will always be with us and it is essential that we provide adequate parking with new housing and with new facilities.

193: This policy refers to more parking as a medium term measure and presents census data (no. of cars per household) to help to justify parking space provision. States that Burpham parking standards are in keeping with the NPPF - but no reference to how or why. Refers to a forum study- does not provide any information on methodology- will this be an appendix?

The neighbourhood forum consultation process involved a residents survey, public meetings, workshops and face to face meetings however there is no specific to explain this policy priority.
19/05/14 - See Evidence gap comments.
Reference to census data and a forum survey.
No SA has been carried out.
Refers to a forum survey- does not detail the findings. How was the assessment carried out- what did it find? It
states an under provision- how did it reach this conclusion? Further analysis of the evidence is recommended
for this policy.
The NPPF supports sustainable Parking policies and therefore would not justify this policy. The NDP refers to
local evidence to support this policy however further work would be required as evidence base.
Refers to Census data, which was used to derive the household-car ratio. Refers to a forum survey and refers to
under provision- but does not detail how this assessment of under provision was arrived at.
19/05/14 - if only 1.5 car parking places per household per development is permitted and 1.8 cars per household
clearly common sense says there is an under provision of 0.3 of a car noting there is no such thing as 0.3 of a
car thus any provision should be rounded up not rounded down to ensure complete supply for the
development
NPPF, Guildford Borough Parking Standards Supplementary planning document, Surrey County Council
Parking standards: The NPPF supports sustainable Parking policies and therefore would not justify this policy.
19/05/14 Why Not? A policy which deliberately leaves vehicles blocking access and footpath ways is
unsustainable, in that the disabled are unable to use foot paths and emergency vehicles cannot gain access. If
vehicles are of road, Public transport vehicles can use estate roads thus it is more sustainable to park of road
than on. Under provision of Parking causes more pollution and mental stress than over provision. Denying
existing reality does not make an action or plan sustainable
The Surrey Transport Plan Parking Strategy (2011) and Vehicle and Cycling Guidance (2012) -
19/05/14 These documents do not reflect the true situation / level of car ownership and distance travelled to
work in Burpham - average 14.32 miles
No, this policy seeks to introduce new parking allowances which would increase those given nationally and
therefore would require significant justification. This policy seems to contradict national planning policy and
local plan which seeks to move towards more sustainable forms of transport.
19/05/14
Yes, there is an evidence gap further work would be required to justify this policy particularly in terms of
demonstrating that there is a significant under provision in the area. This could involve drawing out data from
the forum survey referred to.
19/05/14 The GBC infrastructure study claims an overall car ownership increase 1.45 to 1.5 while in Burpham
this number is 1.8 thus parking regulations considering the Borough as a whole fail to identify High car
ownership levels in Burpham which is causing the problems during planning applications which fail to allow
for this situation in the Parking standards of the Borough.

**Policy: B-T 2c: Cycle Routes**
The Foot and Cycle Paths Map of Burpham (Map 2 of Appendix 1) shows 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. Please also refer to informatives in Appendix 1 (BNF 2).

Note 1: The requirement for cycle routes is to reduce traffic and encourage cycling for health and environmental benefits.

Background workings of the Forum and subsequent changes made to this policy after Reg 14

09/08/14 Addition of suffix “B-” to all Policies
25/08/14 replace with - Major new development will not be permitted where it interrupts established or proposed cycle routes unless suitable mitigation and alternative provision is provided
03/05/14 - deleted Forum will undertake or promote measures
25/08/14 - delete Major new development will not be permitted where it interrupts established or proposed cycle routes.

General Comment leading the above changes:
None received

Supporting Comment:
185: 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.

163: I agree with this policy as alternative methods of transport to the motor car must be encouraged as much as possible

Contrary Comments:
None received

Other Comments:
Refers to traffic congestion caused by private vehicle ownership at the front of this section and how cycling should therefore be promoted. No specific reference within this policy section.
The neighbourhood forum consultation process involved a residents survey, public meetings, workshops and face to face meetings however there is no specific to explain this policy priority.
No reference to consideration of third party comments.
No SA has been carried out.
NDP does not provide details of any analysis. While reference is given generally to supporting studies at the beginning of the document no specific reference is made under each policy approach.
The NDP refers to local evidence to support this policy however further work would be required as evidence base.
No documented evidence has been given. No reference to policy.
Appropriate to reference NPPF (give priority to pedestrian and cycle movements), the Surrey Transport Plan Parking Strategy (2011) and Vehicle and Cycling Guidance (2012)
No, this policy seeks to introduce a new policy, focusing on cycling provision in new developments.
Link needs to be drawn from evidence to the numbers of cycling spaces to be provided for residential developments. This would help justify the numbers of spaces per dwelling that the NDP states. Also a cycle transport study might help the group to identify cycle networks to connect to and potential cycle routes.

**Policy: B-T 2f: Foot Paths**

This policy supports the upgrade of foot paths to joint foot and cycle paths. Permission will not be granted if 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.

Note 1: The above policy reflects the concern of residents for conflict between motor vehicles, cyclists and pedestrians, who do not always respect each others space, as evidenced in our Survey.

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

09/08/14 Addition of suffix “B-” to all Policies
25/08/14 Not be supported replace -granted with supported
25/08/14 Not be Granted - delete granted

**General Comment leading the above changes:**

205: 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. 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. 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.

224: Map Line thickness

**Supporting Comment:**

88: As long as it is deemed safe to do so the joint cycle footpath could contribute significantly to 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

189: Strongly supported, see comments relating to cycling provision

164: I agree with this policy as the safety of pedestrians must be considered paramount

59: Agree

**Contrary Comments:**

248: 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. - policy amended 25/08/14

**Other Comments:**

Advise discussing how this policy can be applied with the LPA.

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.

224: Map copywrite Refers to provision of footpaths and cycle paths and joint cycle footways from new developments through financial contributions (S106/CIL) where the planning merits justify such provision.

No specific reference within this policy section.

The neighbourhood forum consultation process involved a residents survey, public meetings, workshops and face to face meetings however there is no specific to explain this policy priority.

19/5/14 Sometimes common sense needs to take over from the written word.!

No reference to consideration of third party comments.

No SA has been carried out.

NDP does not provide details of any analysis. While reference is given generally to supporting studies at the beginning of the document no specific reference is made under each policy approach.

The NDP refers to local evidence to support this policy however further work would be required as evidence base.

No documented evidence has been given.

No reference to policy.

Appropriate to reference the Surrey Transport Plan Parking Strategy (2011) and Vehicle and Cycling Guidance (2012)

The policy states that cycle and footpaths separate from road space will be encouraged- suggest wording amendment to ensure the design principles in the policy does not contradict with national planning policy. For example, secure by design principles and related policy encourage designing out of crime etc. Keeping cyclists
and pedestrians outside of view from the road reduces natural surveillance and could pose increased risks of crime and fear of crime.
A short transport study or assessment can provide evidence in map form of where the space exists.

**Community Policies**

**Policy: 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. 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.

Note 1: Casinos are expressly excluded from the Neighbourhood as they are a Town Centre use not a local centre use. Introducing such a business would be out of character to the Plan Area.
Note 2: Central locations means in an area central to the plan area of Burpham, such that all users can walk approximately equidistant to the location to those walking from the opposite direction.

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

[GLP defines community uses as C2 and D1 (policy CF1). D1 includes school uses, so planning permission not required to use a school for community use.]
Permission will be granted for a community facility that meets the following identified needs. [add justification for facility and potential uses]
05/04/14 Added (D1 & D2 of the Use Class Order with the exception of casinos which will not be permitted).
09/08/14 Addition of suffix “B-“ to all Policies
26/08/14 Notes 1 & 2 added
05/04/14 Deleted due to this occurring now -"The Church of the Holy Spirit has plans for its new hall to be used for this purpose. Support will be given for this endeavour."
05/04/14 Deleted: Check class an insert order 5 down to 1 but not 1 up to 5

**General Comment leading the above changes:**
Class order needs to be checked
GLP defines community uses as C2 and D1 (policy CF1). D1 includes school uses, so planning permission not required to use a school for community use.

Permission will be granted for a community facility that meets the following identified needs. [add justification for facility and potential uses]

**Supporting Comment:**
89: This is long over due if more community based activities were held locally the need to travel into Guildford centre would be minimised

41: 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.

165: I agree with this policy as community facilities are an essential part of a neighbourhood

58: Strongly Agree

127: 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. 58: Strongly Agree

**Contrary Comments:**
None received

**Other Comments:**
Refers to public consultation responses which suggest the need for community facilities for young people. No reference to existing policy.
Makes reference to responses from the community.
No reference to consideration of third party comments.
No SA has been carried out.
NP does not provide details of any analysis. While reference is given generally to supporting studies at the beginning of the document no specific reference is made under each policy approach.
Refers to community consultation only. No reference to community needs assessments etc.
No documented evidence has been given.
No reference to policy.

Use Guildford Council infrastructure baseline, population data to show if there is an increasing population (to demonstrate the need for more facilities) or age of those living in Burpham to help show what age group facilities need to be catering for.

In keeping with saved policy CF1 of the Guildford Local Plan 2003- could this policy be tailored to be more Burpham specific? For example, could it state the type of community facilities that are desired/preferred? This could be tailored to local need.

If being made more Burpham specific need to collect evidence to demonstrate which type of community facilities are needed more than others. Refer to: 1) Guildford Council infrastructure baseline and 2) Settlement...
hierarchy and show wider distribution of nearest facilities on a map to show where distances to travel might be unacceptable.

## Aspirational Policies

### Policy: B-AT 1: Improvements to Public Transport

Physical improvements to the road and pavement layouts that provide enhanced public transport opportunities will be supported in principle.

Improvements to reliability of bus services to central Guildford and routes to where people want to travel are strongly supported by residents, these routes include Guildford Royal Surrey Hospital, Guildford main line railway station, Woking and London.

**Note 1:** Evidenced by survey results

### Background workings of the Forum and subsequent changes made to this policy after Reg 14

09/08/14 Addition of suffix “B-” to all Policies

**General Comment leading the above changes:**

None received

**Supporting Comment:**

None received

**Contrary Comments:**

None received

**Other Comments:**

No evidence presented. Does make reference to improvements to roads that people want to travel on- lists these roads. Not clear why these roads have been selected- were they identified during public consultation?

Does not refer to stakeholder based evidence. Was this an issue identified during the consultation process for the NDP?

No reference to consideration of third party comments.

No SA has been carried out.

No analysis of evidence presented

No technical or stakeholder evidence presented.

No documented evidence has been given.

No reference to policy.

Guildford Borough infrastructure baseline.

Does not repeat policy. Policy is quite general and no reference to delivery mechanisms to achieve this. Can the policy be made more Burpham specific? The Guildford Borough Council infrastructure baseline may list types of improvements needed to public transport.
Currently aspirational, can the policy be made more specific to Burpham? If so, evidence will be needed. A short transport study or assessment can provide evidence in map form of where the needs for transport improvement are located.

**Policy: B-AT 2: The Railway**

The plan will support a railway station at the site of the current Surrey Merrow Depot. This aspiration accords with the Appendix B. of the Surrey Rail Strategy.

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

19/05/19 insert "at the site of the current Surrey Merrow Depot"
20/05/14 added to supporting text "This accords with the Surrey Rail Strategy. Appendix B"
09/08/14 Addition of suffix "B-" to all Policies
03/5/15 removed "an assessment of the viability of" "and of a railway halt at George Abbott School." change to progression of known facts.
19/05/14 Delete "close to the railway bridge near Merrow Depot"

**General Comment leading the above changes:**

44: 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.

**Supporting Comment:**

76: I would support a Railway Station in the area
177: I agree with this policy as the Merrow station will ease congestion in the Town centre and provide a transport alternative.
49: Could be a good idea but how do South West Trains feel about this?

**Contrary Comments:**

146: I AM STRONGLY AGAINST THIS POLICY FOR WHICH THERE IS NO JUSTIFICATION. IT WILL ADD TO TRAFFIC AND PARKING PROBLEMS WHilst PROVIDING LITTLE BENEFIT.

**Other Comments:**

No evidence presented.
Does not refer to stakeholder based evidence. Was this an issue identified during the consultation process for the NDP?
No reference to consideration of third party comments.
No SA has been carried out.
No analysis of evidence.
No technical or stakeholder evidence presented.
No documented evidence has been given.
No reference to policy.
This is not a land use planning policy. Surrey
R Strategy
19/05/15 Text amended to reflect land use. The station by any definition will straddle the railway as it will require two platforms. One London bound one Guildford bound.
Does not repeat policy.
This is not a land use planning policy. Could this be removed? Could the policy be amended to a land use planning policy?

**Policy: B-AT 3: School Parking**

Provision for all day parking by staff and pupils at all schools is strongly supported. Onsite parking should be provided and drop off and pickup zones should be away from the School entrance to avoid congestion.

Note 1: Local residents have for many years expressed concern over parking at Woodruff Avenue and surrounding roads. This has been identified within the Survey documents Appendix 5 & 6

**Background workings of the Forum and subsequent changes made to this policy after Reg 14**

5/4/14 minor amendments plus additional text "As appropriate, parking shall meet policy"
19/05/14 added; 'off the public highway' Congestion in Burpham lane has made it single track meaning emergency vehicles cannot reach homes in peak periods.
09/08/14 Addition of suffix “B-” to all Policies

**General Comment leading the above changes:**

None received

**Supporting Comment:**

75: I would agree that this is a sensible strategy
195: 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.
178: I agree with this sensible policy

**Contrary Comments:**

None received

**Other Comments:**

No reference to policy.
Does not refer to stakeholder based evidence. Was this an issue identified during the consultation process for the NDP?
No reference to consideration of third party comments.
No SA has been carried out.
No analysis of evidence. No technical or stakeholder evidence presented.
No documented evidence has been given.
No reference to policy.
Schedule of surrey parking standards, Local Transport Plan.
19/05/14 evidence was used but not mentioned. - the current GBC and SCC parking policies are unsustainable as they are causing increased on road parking and traffic congestion - Burpham has a high Car ownership and the through traffic often tip the balance into grid lock. Any commercial premises should provide for parking within its own curtilage so the on road parking does not increase. - The use of Yellow lines in certain areas has been proposed but this will simply move the parked cars to other locations.
Saved Policy G1 (1) of the Guildford Local Plan 2003 and Schedule of Surrey Parking Standards already provides guidance to ensure appropriate provision of parking for new developments. Is this NDP providing anything new? Could it be made more Burpham specific?
General policy- if made more specific to Burpham will require evidence to justify.

Policy: B-AT 4: London Road Parade and Kingpost Parade Parking

The London Road Parade & Kingpost Parade parking has been improved by the new 2012 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.

Note 1: Trade loss is highlighted in appendix 5 (survey summary and peoples views.)

Background workings of the Forum and subsequent changes made to this policy after Reg 14

09/08/14 Addition of suffix “B-” to all Policies

General Comment leading the above changes:
None received

Supporting Comment:
180: I agree with this policy
47: Agree parking is still an issue and there are frequently no free spaces.

Contrary Comments:
110: My comments at B-FD3 about managing the parking here and on the Aldi site apply. You mention a one or two hour free period. This may be insufficent 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”.

Other Comments:
States that the new road layout is causing problems. No reference to evidence to back this claim up. Did this emerge from public consultation?

Does not refer to stakeholder based evidence. Was this an issue identified during the consultation process for the NDP?

No reference to consideration of third party comments.

No SA has been carried out.

No analysis of evidence.

No technical or stakeholder evidence presented. Refers to new road layout causing problems- where was this conclusion drawn from?

No documented evidence has been given.

No reference to policy.

Not a land use planning policy- should discuss with the council highway department.

Does not repeat existing policies.

Not a land use planning policy- should discuss with the council highway department.

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

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 Local Green Spaces.

Policy: B-AC 2: Improvements to A3

Soundproofing along the A3 Guildford bypass through Burpham is essential to improve the comfort and well-being of the residents and shall be considered as part of any new residential or commercial development proposal with the potential to increase traffic levels through Burpham ward. Financial contributions should be sought from applicants where appropriate using S106/CIL provisions.

Overwhelming numbers consider traffic noises a problem and if solar panels can be incorporated within the sound barriers this would be of commercial benefit.

Background workings of the Forum and subsequent changes made to this policy after Reg 14 09/08/14 Addition of suffix "B" to all Policies

05/0914 - removed 'Priorty' and replaced with 'requirement'

General Comment leading the above changes:

None received

Supporting Comment:

196: 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.

182: I wholeheartedly agree with this policy

45: Agree
Contrary Comments:
None received

Other Comments:
No evidence presented. Refers to impacts on community- but no verifiable evidence presented.
Does not refer to stakeholder based evidence. Was this an issue identified during the consultation process for the NDP?
No reference to consideration of third party comments.
No SA has been carried out.
No analysis of evidence.
No technical or stakeholder evidence presented.
No documented evidence has been given. Did the public consultation highlight this as an issue?
No reference to policy.
In the present format, this does not appear to be a deliverable land use planning policy. Findings from the public consultation survey, noise assessments to demonstrate impacts on local communities.
19/05/14 Central and Local Noise assessment have ignored the A3 past Burpham as it is considered a HA problem Noise levels can exceed 90db on 'bad days' 85db plus is not uncommon.
Does not repeat policy.
Could the wording of this policy be amended. For example, could it make reference to CIL S106 monies being directed to providing noise insulation? If so, could this policy be incorporated into policy FD5 (improvements to infrastructure)? Findings from the public consultation survey, noise assessments to demonstrate impacts on local communities.

Policy: 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.

Background workings of the Forum and subsequent changes made to this policy after Reg 14

09/08/14 Addition of suffix “B-” to all Policies

General Comment leading the above changes:
None received

Supporting Comment:
None received

Contrary Comments:
None received
Other Comments:
Refers to community consultation and 2011 census data.
Refers to stakeholder based evidence.
No reference to consideration of third party comments.
No SA has been carried out.
No analysis of community consultation evidence. Provides an analysis of census data, but from the analysis it is not clear how the NDP plan arrived at the need for an extra three classes per year- could further analysis be undertaken to show how this figure was arrived at?
More analysis of technical evidence presented than stakeholder.
Census data and reference to a public consultation.
No reference to policy.
Guildford Borough infrastructure baseline, school place planning reports from the local education authority.
Aspect of the policy that focuses on extending existing schools: this is already covered in saved Policy CF4 of the Guildford Local Plan. Is this aspect of the policy adding anything new?
The Guildford Borough infrastructure baseline will provide information on school provision and whether there is pressure on places and whether new schools are required. Aspect of the policy that refers to provision of a new school- this is outside the remit of the NDP. However, the NDP could suggest preferred sites for the location of a school- for example, the Guildford Local Plan 2003 states that schools within inner areas of the town complicates peak hour traffic patterns- could suggest new sites not within inner areas of the town. If the NDP is going to specify locations or criteria for locations (see saved Policy CF3 Pre-school education for examples of potential criteria for school locations), could assess current traffic patterns, and road infrastructure provision etc. to help determine potential sites for allocation.

Addendum 1

Addendum 2 – responding to Andrew Ashcroft Health Check
General Comments
Further to AA’s comments Health check of Nov 14 –

- The Forum has attempted to add greater clarity to the policies to assist the development industry and any other readers.

- We note your comments regarding merging the policy document and appendices into one document. However this would create an electronic document of considerable, size making viewing and downloading via email difficult for computer users. We therefore choose to retain the Plan in separate identifiable sections for ease of use.

- Our introduction has been amended to include a vision statement.
• We note your suggestion for a separate description of the area but we believe that character descriptions of Burpham along with our Green Spaces document adequately describes our local character.

• Regarding your suggestion for additional to B-NF6, this has been done. Please see addendum 11.

• Regarding your suggested layout for the Plan, in terms of sections and headings, we have considered this carefully but feel it would be of greater benefit to the development industry to have the polices at the forefront of the Plan, with other background information in Appendices or other submission documents. We note there is no statutory requirement for a specific layout, however, we believe our approach avoids ambiguities over which sections of the Plan are most significant. Drawing the reader to the policies at the outset is therefore our preferred option for document layout and ease of readability.

• Regarding your suggestion for more justification for each policy, again, for ease of reading, we do not believe repetition of information contained in the appendices is required in the body of the document. We note there is no statutory requirement for supporting text.

• Regarding policy wording a number of polices have been amended. Please refer to the Addendum to BNF 11 for examples.

• In relation to your comment regarding land use and non-land use polices, in light of the number of non-planning related variables that could affect the delivery of the non-land, use policies we feel the term aspirational is appropriate and so it has been retained.

• To maintain the quality and detail when printed at A4, we have decided to keep the narrative on a separate page, noting that the Map 3 can be expanded electronically so that road names are clear.
• We have considered carefully the manner by which consultation comments and actions undertaken are displayed. We feel that within the confines of neighbourhood planning and given the exceptional level of detail and information provided, tabular format would not be practical in this instance, although it may be more appropriate in other circumstances where there is a different level of information. We note your comment that there is no need for policies to be included within the consultation statement but, the reader can easily refer to each policy next to its relevant text. Regarding your comment about a tracked changes set of policies, this has been included as an Addendum to BNF 12.

• We note your comment that our responses are insubstantial in relation to the consultees’ comments. So we have expanded relevant responses (see Addendum to BNF 11).

• We note your observations on the current relationship of the emerging Neighbourhood Plan and emerging Local Plan. Case law is still being generated in this complicated area and we do not wish to delay to the production of our Neighbourhood Plan. We also re-worded some elements in BNF 11.