

#### **Policy H4: Housing density This policy has been deleted?**

However, Compton Parish Council agreed with the option to address housing density in Guildford.

Do you have any other comments or suggestions?

We think that Policy H4 should also take into account the capacity of the local road network and other supporting infrastructure (sewers).

'Appropriate' density is vague and offers no basic framework.

Key / iconic views should be maintained

#### **Question 2 - Policy H5: Housing extensions and alterations**

Do you agree with the preferred option to address housing extensions and alterations in Guildford?

Compton PC agrees with the preferred option,

Do you have any other comments or suggestions?

We would like to see the policy strengthened to ensure that housing extensions and alterations respect the surrounding landscape, especially in designated Areas of Great Landscape Value and Areas of Outstanding Natural Beauty (and the land forming their settings) and conservation areas.

The terms 'acceptable or unacceptable' in planning terms are vague.

#### **Question 3 - Policy H6: Housing conversion and sub-division**

Do you agree with the preferred option to address housing conversion and sub-division in Guildford?

Compton PC agrees with the preferred option to address housing conversion and sub-division

Do you have any other comments or suggestions?

The terms 'acceptable or unacceptable' in planning terms are vague.

In addition to ensuring conversions do not harm the character of the locality they should also not harm the character of the property

#### **Policy H7 Review Mechanisms**

Any potential viability review of affordable housing ratios should be in the public domain and only permissible in exceptional circumstances

When affordable housing ratios are lower than agreed, the council should reserve the right to postpone development if by doing so a greater level of affordable housing could be delivered in the future

### **Policy H8: First Home**

CPC agrees with the policy to set a minimum percentage of discounted housing in perpetuity for first time buyers and would like to see a criteria for all affordable housing

### **Question 4 - Policy E10: Rural development (including agricultural diversification)**

Do you agree with the preferred option to address rural development (including agricultural diversification) in Guildford?

Compton PC agrees with the preferred option to address rural development.

Do you have any other comments or suggestions?

Adequate parking is often an afterthought. Such business may later seek to improve income by diversifying, and residents and Parish Councils have ongoing, unwanted parking issues as a result. These would be better addressed at planning stage.

We would also like to see the policy amended so that flood-lighting is not permitted in the green belt or in areas that impact the countryside, especially the AGLV and AONB. Dark skies are an important characteristic of the AONB, and flood-lighting can impact on wildlife and important ecosystems as well as causing a nuisance to local residents.

The NPPF permits limited 'infill'. However, there doesn't appear to be any definition of 'limited' and rural 'infill' is often on streets, not designed for the type of traffic we have today. The way in which road safety and approval of new schemes by Surrey Highways needs reviewing. A new build in Compton was permitted with access out onto one of the busiest streets in Surrey (B3000) with very poor sight lines on the basis that there was no history of previous accidents at this spot. This approach is flawed, as there hadn't previously been a property at this site and therefore no one entering or leaving the busy street from this section. Due to the number of applications, no site visit was made.

### **Question 5 - Policy E11: Horse-related development**

Do you agree with the preferred option to address horse-related development in Guildford?

Compton PC agrees with the preferred option to address horse-related development.

Do you have any other comments or suggestions?

An additional policy that ensures owner details for horses/ land used for animal grazing is essential. Compton PC has experienced animals escaping (where fencing is not fit for purpose), which has in turn caused road traffic accidents. There have also been incidents where several horses died after being left to graze in a field with ragwort. The landowner lived 'off-shore' and the horses belonged to travelers, hence no-one could readily be held accountable.

### **Question 6 - Policy P6: Biodiversity in new developments**

Do you agree with the preferred option to address biodiversity in new developments in Guildford?

Compton PC does not believe that the Policy P6 goes far enough. We feel that the buffer zones around environmentally sensitive areas should be specified, and that these should take into account the type of development adjacent to a particular area. For example a buffer zone of 50m should be introduced with regard to any road, whereas a narrower buffer might suit a cycle way or sports ground.

- . We also feel that words such as "expects" and "should" are too weak and will give developers too much 'wiggle room'. These should be replaced in all instances by "requires" and "must". For, example, The policy "requires proposals to be guided by other national, regional and local biodiversity strategies." And "Where sites contain or are adjacent to sensitive habitats, appropriate buffers and, where necessary, barriers must be incorporated in order to protect the habitats from the impacts of the development, including those resulting from recreational use. Schemes should be designed to avoid light pollution. If a lighting strategy is provided, it must take account of the potential impacts on wildlife.
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### **Question 7- Policy P7: Biodiversity net gain**

Do you agree with the preferred option to address biodiversity net gain in Guildford?

Compton PC agrees with Policy P7 re biodiversity net gain and welcomes the Council's aim to increase biodiversity net gain from 10 to 20 per cent.

Do you have any other comments or suggestions?

No further comments.

### **Question 8 - Policy P8: Woodland, trees, hedgerows and irreplaceable habitats**

Do you agree with the preferred option to address woodland, trees, hedgerows and irreplaceable habitats in Guildford?

- . Whilst Compton PC supports GBC's aim to protect irreplaceable habitats, the PC does not feel that the wording of Policy P8 provides this protection. In particular Bullet Point 2, which allows the loss, damage or deterioration of irreplaceable habitats by development, if "there are wholly exceptional reasons and the exceptional benefits of the development proposal outweigh the loss of the habitats, demonstrated through unequivocal and credible evidence". The term "exceptional" is a subjective and Compton PC feels that these "exceptional reasons" and "exceptional benefits" need to be spelt out for the policy to have meaning.

Do you have any other comments or suggestions?

Compton PC would like to see the buffer zone around ancient woodland increased to 50m in line with recommendations by the Woodland Trust. We also disagree with the suggestion that a road should be used to separate ancient woodland from housing development. Building a road adjacent to ancient woodland could have a negative impact on this sensitive environment in terms of noise, air pollution and wildlife.

The PC is concerned that Point 5 is too weak and the words "Site design is **expected** to incorporate significant trees plus their root structures and understory within the public realm" should be changed to "Site design is **required to** incorporate significant trees ...).

#### **Question 9 - Policy P9: Priority species and priority habitats on undesignated sites**

Do you agree with the preferred option to address priority species and priority habitats on undesignated sites in Guildford?

Compton PC does not believe Policy P9 gives sufficient protection to priority species and habitats.

Do you have any other comments or suggestions?

The mitigation hierarchy gives developers "wiggle room" to simply provide a "compensatory habitat". In some cases, providing alternative habitats is not a solution and the policy does not address this. Woodland, for example, may need to be hundreds of years old before it creates conservation habitat of a comparable quality to that which is being lost or harmed.

#### **Question 10 - Policy P10: Contaminated land**

Do you agree with the preferred option to address contaminated land in Guildford?

Compton PC agrees with Policy P10 with regard to contaminated land.

Do you have any other comments or suggestions?

In addition to the policies laid out, greater resources in the enforcement department would help avoid contamination taking place. Compton/Artington has experienced two large illegal landfill scenarios where earlier intervention would have reduced the impact.

### **Question 11 - Policy P11: Air quality and Air Quality Management Areas**

Do you agree with the preferred option to address air quality and Air Quality Management Areas in Guildford?

Compton PC agrees with Policy P11 with regard to AQMAs.

Do you have any other comments or suggestions?

We would suggest replacing the sentence in point 1 "In particular, development proposals within or adjacent to an Air Quality Management Area (AQMA) will be expected to be designed to mitigate the impact of poor air quality on future occupiers" with "In particular, development proposals within, adjacent to, or impacting on, an Air Quality Management Area (AQMA) will be required to be designed to mitigate the impact of poor air quality on existing and future occupiers".

The policy acknowledges the impact of biomass, but not traffic, which is the main culprit at present. An independent assessment of the impact of a new site on its surrounding area should therefore include the accumulative impact of pollution from traffic on existing AQMA's and borderline areas.

We would also like to see the re-establishment of a permanent air quality monitoring station.

AQAPs should have a time frame. Without this monitoring can go on for many years and actions that are ineffective on their own (such as the no right turn sign into Down Lane, which is only adhered to by buses but is not policed / upheld) remain in place, buying time until technology improves which is unhelpful for the here and now and against National policy.

### **Question 12 - Policy P12: Water resources and water quality**

Do you agree with the preferred option to address water resources and water quality in Guildford?

Compton PC agrees with Policy P12.

Do you have any other comments or suggestions?

Point 3 is too vague. The requirement for development that will impact on the underground and surface water courses to “contribute towards” those water bodies maintaining or achieving ‘Good Ecological Status’ does not go far enough. Developers should be required to fund mitigation measures in full. Simply asking for a “financial contribution” could result in a very small contribution being made.

### **Question 13 - Policy P13: Sustainable Drainage Systems**

Do you agree with the preferred option to address sustainable drainage systems in Guildford?

Compton PC agrees with Policy P13

Do you have any other comments or suggestions?

The policy should be extended to ensure that SuDs schemes are required to satisfy not just technical and design requirements, but also ecological requirements. For example it is important to ensure that where water run-off will impact on an important habitat, the developer is responsible for ensuring that the quality and volume of the water does not alter the balance of the eco-system in question.

### **Question 14 - Policy P14: Regionally Important Geological / Geomorphological Sites**

Do you agree with the preferred option to address Regionally Important Geological / Geomorphological Sites in Guildford?

Compton PC agrees with Policy P14

Do you have any other comments or suggestions?

Within the Policy, it would be good to have protection for sites which are not on the Surrey RIGS Group list, but which are of equal Geological /Geomorphological interest/importance as those which have been listed.

Point 2 could be strengthened by changing “ **every effort is made** by the applicant to reduce harm to the conservation interests of the Regionally Important Geological/Geomorphological Site through avoidance and mitigation measures” to “the applicant **must** reduce harm to the conservation interests of the Regionally Important Geological/Geomorphological Site through avoidance and mitigation measures.”

### **Question 15 - Policy D4: Achieving a High Quality Design and Local Distinctiveness**

Do you agree with the preferred option to address high quality design and local distinctiveness in Guildford?

Compton PC agrees with Policy D4.

Do you have any other comments or suggestions?

1 should include variety of design, particularly on large developments to avoid a repetition of old style housing estates where many houses looked the same.

5c Maximum building heights should be established for urban and rural areas. Without a policy specifying building heights, developers will be able to submit applications for tall tower blocks, which change the character of the town centre. Even if these applications are rejected by the Council, they could be pushed through on appeal. There should be no buildings above three stories in the setting of the AONB or in other sensitive areas.

5e/f – Reflective materials/colours should be avoided in areas which are overlooked from the AONB.

5f – Adequate screening should be a requirement for any development overlooked from any part of the AONB.

7e – The character of development -- ‘new development will be required to respond to the Guildford Town Centre Views SPD’ – could be widened to include views into and out of open countryside.

We would like to see vernacular design encouraged in traditional Surrey/village settings and in areas which form the setting to the Surrey Hills AONB and a greater emphasis on energy efficient design

### **Question 16 - Policy D5: Privacy and Amenity**

Do you agree with the preferred option to address privacy and amenity in Guildford?

Compton PC agrees with Policy D5.

Do you have any other comments or suggestions?

Protection of amenity should apply during the building phase as well as after and this must include traffic volume, routes and working times.

No further comments.

### **Question 17 - Policy D6: Shopfront Design**

Do you agree with the preferred option to address shopfront design in Guildford?

Compton PC agrees with Policy D6 regarding shopfront design.

Do you have any other comments or suggestions?

Compton PC suggests that GBC explores the option for avoiding vibrant colours on the High Street altogether, and instead opting only for neutral tones, which are more in keeping with a historic town centre.

### **Question 18 - Policy D7: Advertisements, hanging signs and illumination**

Do you agree with the preferred option to address advertisements, hanging signs and illumination in Guildford?

Compton PC does not agree with Policy D7 (See below).

Do you have any other comments or suggestions?

Compton PC does not support the introduction of any illuminated or neon shop-fronts or signs in the historic section of the High Street. Policy 2 could be widened to incorporate sight-line issues, rather than just access (as ad-hoc signs on street corners can affect sight lines for drivers).

### **Question 19 - Policy D7: Public Realm**

Do you agree with the preferred option to address public realm in Guildford?

Compton PC has no objection to Policy D7.

Do you have any other comments or suggestions?

Change bullet point 9 (public art) "Considered and assessed against the Council's Art Strategy and against public opinion via the use of on-line polling."

Add a policy requiring enhancement of the river frontage (in appearance and usage).

### **Question 20 - Policy D9: Residential Intensification**

Do you agree with the preferred option to address residential intensification in Guildford?

Compton PC agrees with Policy D9 (subject to further clarification)

Do you have any other comments or suggestions?

Point C (“Proposals involving ‘back-land’ development must avoid long, narrow and isolated access points”) is too vague. How “long” and “narrow” must the access points be?

Point F Compton PC believes this Policy is too vague and subjective. What are “appropriate infrastructure contributions”? There needs to be some guidance, for example a schedule of infrastructure contributions could be drawn up according to how many houses/facilities are built on a particular site.

The accumulative effect would need to be assessed so that adequate facilities / services accompany intensification (along with adequate CIL).

### **Question 21- Policy D10: 'Agent of Change' and Noise Impacts**

Do you agree with the preferred option to address the 'Agent of Change' principle and noise impacts in Guildford?

Compton PC agrees with Policy D10.

Do you have any other comments or suggestions?

Lorries and motor bikes are especially noisy as is stop/start traffic. Greater consideration should be given to signage and suggested networks for lorries and motor bikes/motor bike shops where they pass through residential areas. Where possible, average speed cameras would also improve noise from acceleration/breaking as well as improve safety.

No further comments.

### **Question 22 - Policy D11: The Corridor of the River Wey and the Guildford and Godalming Navigation**

Do you agree with the preferred option to address the corridor of the river Wey and the Guildford and Godalming navigation in Guildford?

Compton PC supports Policy D11

Do you have any other comments or suggestions?

Compton PC would like to see the policy extended to include specific ruling on the prevention of pollution or deterioration of water quality of the River Wey and the Guildford and Godalming Navigation.

### **Question 23 - Policy D12: Sustainable and low impact development**

Do you agree with the preferred option to address sustainable and low- impact development in Guildford?

Compton PC agrees with Policy D12

Do you have any other comments or suggestions?

The whole-life environmental impact of new and existing buildings should be considered. Where a building is undergoing change of use, for example the Debenhams building, the carbon footprint could be reduced by reusing as much as possible the existing fabric of the building already on the site.

#### **Question 24 - Policy D13: Climate Change Adaptation**

Do you agree with the preferred option to address climate change adaptation in Guildford?

Compton PC agrees with Policy D13.

Do you have any other comments or suggestions?

No further comments.

#### **Question 25 - Policy D14: Climate Change Mitigation**

Do you agree with the preferred option to address climate change mitigation in Guildford?

Compton PC does not agree with Policy 25.

Do you have any other comments or suggestions?

Compton PC would prefer to see an interim climate-change mitigation policy introduced, which could be updated in the light of possible amendment to the *Planning and Energy Act 2008*. To introduce a more stringent carbon-reduction standard that is subject to “viability testing” would give developers the “wriggle room” to simply say that meeting the new standard is not viable.

#### **Question 26 - Policy D15: Large-Scale Renewable and Low-Carbon Energy**

Do you agree with the preferred option to address large-scale renewable and low-carbon energy in Guildford?

Compton PC could only support this Policy under the proviso that any land selected for large-scale renewable and low-carbon energy would have zero impact on Areas of Outstanding Natural Beauty (including their settings), Areas of Great Landscape Value and on the openness of the green belt.

Do you have any other comments or suggestions?

Incorporate within the policy a stipulation that no land selected for large-scale renewable and low-carbon energy will impact the AONB or its setting, AGLV or the openness of the green belt. Place a greater emphasis on energy efficiency in terms of design

### **Question 27 - Policy D16: Designated Heritage Assets**

Do you agree with the preferred option to address designated heritage assets in Guildford?

Compton PC supports Policy D16.

Do you have any other comments or suggestions?

No further comments.

### **Question 28 - Policy D17: Listed Buildings**

Do you agree with the preferred option to address listed buildings in Guildford?

Compton PC agrees with Policy D17.

Do you have any other comments or suggestions?

The Street through Compton has many listed buildings, the integrity of which is affected by traffic vibrations and lorries in particular. Vulnerable buildings as well as the impact of noise should be considered when routing heavy/noisy traffic

No further comments.

### **Question 29 - Policy D18: Conservation Areas**

Do you agree with the preferred option to address conservation areas in Guildford?

Compton PC agrees with Policy D18

Do you have any other comments or suggestions?

Compton PC would like to see increased resources given to Conservation enabling reports and asset reports to be up-to-date and relevant.

No further comments.

**Question 30 - Policy D19: Scheduled Monuments & Registered Parks and Gardens**

Do you agree with the preferred option to address scheduled monuments & registered parks and gardens in Guildford?

Compton PC agrees with Policy D19.

Do you have any other comments or suggestions?

No further comments.

**Question 31 - Policy D20: Non-Designated Heritage Assets**

Do you agree with the preferred option to address non-designated heritage assets in Guildford?

Compton PC agrees with Policy D20.

Do you have any other comments or suggestions?

No further comments.

**Question 32 - Policy ID5: Protecting Open Space**

Do you agree with the preferred option to address protecting open space in Guildford?

Compton PC agrees with Policy ID5

Do you have any other comments or suggestions?

No further comments

**Question 33 - Policy ID6: Open Space in New Developments**

Do you agree with the preferred option to address open space in new developments in Guildford?

Compton PC agrees with Policy ID6

Do you have any other comments or suggestions?

Compton PC would like to see more land allocated to allotments. There is a growing trend for families to grow their own food, and lengthy waiting lists for existing allotments across the borough. It is unclear as to how thresholds will be dealt with when land is sold and developed by more than one developer. For example, if developer A builds 49 houses, he/she is not required to implement additional play spaces etc. Then, if developer B also

builds 49 houses and is also under the threshold, this could result in a development of almost 100 houses with no 'green infrastructure'. Policies must account for accumulative impact.

#### **Question 34 - Policy ID7: Sport, Recreation and Leisure Facilities**

Do you agree with the preferred option to sport, recreation and leisure facilities in Guildford?

Compton PC agrees with Policy ID7.

Do you have any other comments or suggestions?

Compton PC would like to see a clause added, which states: "Large sport, recreation and leisure facilities are expected to be of a scale and mass that is appropriate to the surrounding landscape/built environment."

#### **Question 35 - Policy ID8: Community Facilities**

Do you agree with the preferred option to address community facilities in Guildford?

Compton PC agrees with Policy ID8

Do you have any other comments or suggestions?

Guildford town centre has many facilities (G Live, theatres, restaurants) which might be more widely supported by the borough's communities if night time public transport were implemented.

#### **Question 36 - Policy ID9: Retention of Public Houses**

Do you agree with the preferred option to address the retention of public houses in Guildford?

Compton PC supports Policy ID9

Do you have any other comments or suggestions?

Nighttime public transport across the borough would benefit businesses such as public houses

No further comments.

#### **Question 37 - Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network**

Do you agree with the preferred option to address achieving a comprehensive Guildford borough cycle network in Guildford?

Whilst Compton PC supports a denser cycle network across the borough, the PC has strong reservations about some of the routes presented, for example the proposed greenway to the west of Guildford follows a steep gradient at the northern end and crosses the A31 at a point where visibility is extremely poor to the west, and where frequent road traffic accidents have occurred. Further south, the proposed route passes through a belt of ancient woodland, which would potentially cause harm to this sensitive natural habitat.

Whilst modal shift is supported, in reality it is unsafe on busy roads such as the B3000 where several very serious and one fatal accident involving cyclists have happened recently. Cycle lanes should be sufficiently wide and preferably separate from mainstream traffic.

Do you have any other comments or suggestions?

Remove or reroute the green cycle route to the west of Guildford.

### **Question 38 - Policy ID11: Parking Standards**

Do you agree with the preferred option to address parking standards in Guildford?

Compton PC agrees with the preferred option to address parking standards in Guildford.

Do you have any other comments or suggestions?

There is no mention within the Policy of underground or multi-story parking provision. In a borough which has a shortage of land available for building, surface car parking should be kept to a minimum. New developments, particularly non-residential developments, should come with a requirement for parking to be underground, or in less visually sensitive areas, multi-story car parks could be built. Compton PC would also like to see building above some of surface car parking across the borough.

Use of climate change as a lever for councils and developers to underestimate the level of parking required on the basis of modal shift has happened all too often. When assessing plans, councillors must be realistic about car use today, which has in fact increased since Covid-19 and concerns over use of public transport.

New homes often convert garages into offices and other residential spaces resulting in cars being parked on pavements and roads. Careful consideration should be given before consenting to change of use where off street parking is likely to cause obstruction.

### **Question 39 - Additional Comments**

Do you have any other comments or suggestions for issues that should be considered within the Plan?

Whilst Compton PC supports many of the individual policies with the Development Management Document, we believe that the overall framework (the spatial strategy in the

Local Plan) is fundamentally wrong, ie the houses are in the wrong place, and will exacerbate existing traffic congestion on the local road network. There was no consultation or opportunity for input into the framework that underpins the Local Plan. This, has resulted in very little support for the Plan across the borough and despite intensive contributions and suggestions, Compton remains deeply concerned about the impact the Plan in its current form will have on our parish and the wider area.