

**West Horsley Parish Council**  
**Response to Local Plan Part 2: Development Management Policies**  
**Issues and Preferred Options: Consultation Comments**

**DRAFT – TO BE APPROVED**

**This submission is made by West Horsley Parish Council (WHPC).**

**We have chosen to present this in a tabular format for ease of reference.**

**General Observations that we would like noted:**

- 1. Neighbourhood Plans.** It is disappointing that there is virtually no reference to Neighbourhood Plans throughout the topic papers and suggested policies. Once adopted Neighbourhood Plans are part of the Borough's Development Plan, and carry full weight in the decision-making process. WHPC recommends that the proposed policies should make reference to Neighbourhood Plans and a general reference to these should be provided in the introduction.
- 2. Policy P2: Green Belt.** Two issues are frequently debated at Planning Committee – infilling, and proportionality/harm to the openness of the Green Belt for extensions to homes in the Green Belt. In contrast to this, villages no longer in the Green Belt are seeing significant extensions to homes which are quite often totally out of keeping with the local character of our village. GBC has an opportunity here to address these by having policies to support and further clarification for Policy P2: Green Belt in the adopted Local Plan (part one). Policy P2 as it exists is open to interpretation and does not provide clear definitions and guidance on these key issues, as well as many others. This does not help Planning Officers who do not have clear guidance to follow.
- 3. Enforcement Notices.** WHPC recommends that a review is made of Enforcement Notices, closed and open, over the last few years. This will enable GBC to ascertain the key issues that reoccur which could be covered by additional policies, or clearer definitions in the policies existing and proposed.
- 4. Dog Related Development – Policy required as per E11 Horse Related Development.** In connection with the comments above re Enforcement Notices it is quite apparent that there are a growing number of dog related activities springing up on local green fields and

Green Belt land. This is for dog walking and exercising, and brings with it fencing of fields and associated structures/equipment. Whilst being in favour of growing the rural economy, WHPC feels that this aspect needs managing through a specific policy and licensing.

5. **Residential Design Guide (2004)**. This document is mentioned in several places. While still referenced, its dated approach would potentially carry little weight in planning application decisions, especially with the existence of the National Design Guidance. However, the many and varied character areas that make up the Borough of Guildford need to be clearly defined. WHPC recommends that the Residential Design Guide is updated urgently. Again, reference should be to local Neighbourhood Plans.

#### West Horsley Parish Council - Comments on the preferred Policy Options

Topic/Policy	Page Ref	Agree/ Disagree	Comments
Housing	10		
H4: Housing Density	12	Agree, providing reference is made to Neighbourhood Plans. This policy needs much clearer guidelines and detail – it is too loose.	<ol style="list-style-type: none"> <li>1. Under the preferred option at point 1c there should be reference to the character of the landscape setting which is equally important.</li> <li>2. Specific densities for specific ‘characters/types’ of areas needs to be provided within the proposed policy.</li> <li>3. Planning Officers are at a disadvantage as there is no guidance on this which leads to highly inappropriate densities proposed by developers with no regard to local character.</li> <li>4. It would be helpful within this policy to explain why Guildford Borough is so heavily constrained re Green Belt, Woodland etc which will influence density.</li> <li>5. Reference to Neighbourhood Plans should be included as these give specific local knowledge and density measurements that must be taken into consideration.</li> </ol>
H5: Housing Extensions & Alterations	17	Agree if comments are	<ol style="list-style-type: none"> <li>1. There is an opportunity within this policy to tackle the increasing issue that is raised time and time again at Planning</li> </ol>

		<p>taken into consideration. A policy is needed but there are significant aspects missing that need to be included.</p>	<p>Committee over proportionality. It is worth considering the approach other District and Borough Councils take, as GBC is often criticised over its rigid application of some policies. Given that each application is considered on its own merits there could be clearer definitions and more flexibility.</p> <ol style="list-style-type: none"> <li>2. A clear policy is needed on outbuildings/sheds/ outdoor offices/gyms etc especially as we will see increased working from home as a result of Covid-19.</li> <li>3. Roof Extensions need to be included in the same way that Basement extensions are addressed. There are many issues with applications where the owner wishes to convert the roof into a third floor as habitable accommodation, but this can fundamentally alter the street scene and character of the local area as it is introducing a third floor. Clear definition is needed here re what is/is not allowed.</li> <li>4. Reference is required to Neighbourhood Plans.</li> <li>5. Clear guidance on this is needed as Policy P2 is open to interpretation.</li> </ol>
H6: Housing Conversion and sub-division	22	Agree	<ol style="list-style-type: none"> <li>1. It is paramount that where homes are sub-divided that the local character is respected in the design and finished appearance.</li> <li>2. This should also be considered in the wider village context and not just restricted to individual roads.</li> </ol>
<b>Additional comments on Housing</b>			<p>There appear clear guidelines for Housing in Urban Areas and there are polices covering development in the Green Belt and Countryside. But there is no clear policy for Housing in Rural Areas that has been removed from the Green Belt. This aspect needs to be considered. It is important that we do not lose the thrust and specification of the policies in the saved Local Plan 2003 which currently provides clear</p>

			guidance that leaves little open to interpretation. These new policies must do the same.
<b>Economy</b>	25		
E10: Rural Development	28	Agree if suggested additions included	<ol style="list-style-type: none"> <li>1. Countryside – needs a point to include shops that are set up in conjunction with rural business e.g. not farm shops as such, but shops that sell from the premises of the rural activity e.g. Silent Pool Gin and others within the Surrey Hills Enterprise Scheme.</li> <li>2. Tighter definitions are needed as in the saved 2003 Local Plan.</li> <li>3. This policy needs to also have reference to the impact of buildings on locally and nationally important views e.g. from the AONB, and reference to the Surrey Hills Management Plan.</li> </ol>
E11: Horse Related Development	32	Agree if suggested additions included	<ol style="list-style-type: none"> <li>1. The Policy needs to include a reference to the management of small caravans that often appear on the site of stables or where horses are being kept, which are clearly being lived in.</li> <li>2. Some structures that are being built in the Green Belt do not have planning permission such as additional stable blocks so this needs to be tightened.</li> </ol>
<b>Additional Comments on Economy</b>			<p>There is a real need for a Policy on Dog Related Development. Reference the number of Enforcement Notices, the increasing number of structures and associated equipment that is appearing across our countryside and green fields. This needs to be taken under urgent control.</p> <p>There is no reference to Homeworking which is still a saved 2003 LP Policy E5 – this is significantly more important in the context of Covid-19.</p>
<b>Protecting</b>	37		

<p>P6: Biodiversity in New Developments</p>	<p>43</p>	<p>Policy needed but proposed is not strong enough</p>	<ol style="list-style-type: none"> <li>1. Of grave concern are the facts stated at 4.6 and 4.7 whereby Guildford Borough's situation is significantly worse than elsewhere in the country and nationally. Critical levels have been reached in priority habitats. This needs urgent attention and so the policy wording needs to be considerably strengthened.</li> <li>2. Biodiversity has not been seen as a priority as stated at 4.24 and it is obvious that during Planning Committee debates it is not given the time of day, even where there is a Neighbourhood Plan Policy to strengthen the case for reducing the impact of loss.</li> <li>3. Neighbourhood Plans are simply given lip service in this area, as are other local and national policies, with mere conditions added in, putting the onus on the developer to deliver the net biodiversity increases required – but is this ever followed up?</li> <li>4. There is a lot of good intention but no accountability for delivering, e.g. new tree planting at point 5 is expected to focus on, it should say <b>MUST</b> focus on.</li> <li>5. A specified net increase in biodiversity should be demanded for <b>ALL</b> levels of development, there should not be a get out clause to supply elsewhere in the Borough.</li> <li>6. 4.38 refers to OPM but is only given three lines – it pales into insignificance and should have far more detail provided. Guidelines on buffer zones should be given as avoidance strategies.</li> <li>7. Point 9 in the preferred options needs the lighting element as a separate point, it is not only the impact on wildlife, but also the environment overall and there should be mention here of Dark Skies.</li> </ol>
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P7: Biodiversity Net Gain	52	Agree to an extent	<ol style="list-style-type: none"> <li>1. As above, this policy needs to be really strong, e.g. 4a) states avoiding impacts on biodiversity as far as possible feels very woolly and open to avoidance and non-delivery.</li> <li>2. Reference needed to Neighbourhood Plans.</li> </ol>
P8: Woodland, trees, hedgerows and irreplaceable habitats	58	Agree to an extent	<ol style="list-style-type: none"> <li>1. At point 4b) the buffer zone of 15m seems very low.</li> <li>2. There should be clear guidance if there is the presence of OPM.</li> </ol>
P9: Priority Species and Habitats on undesignated sites	64	Agree	
P10: Contaminated Land	67	Agree	<ol style="list-style-type: none"> <li>1. As long as the proposed policy does not detract from the guidance and requirements of the NPPF.</li> <li>2. This is a specialist area and we need to be very clear what we expect this Policy Area can achieve.</li> </ol>
P11: Air Quality and Air Quality Management Areas	70	Agree	<ol style="list-style-type: none"> <li>1. This is obviously an area of significant concern in our Borough. There should clearly be more AQMAs.</li> <li>2. What are the levels around the Borough? It would be helpful to publish a table of levels and encourage additional monitoring.</li> <li>3. There is no guidance provided as to how developers will be expected to ensure that air quality is improved.</li> </ol>
P12: Water Resources and Water Quality	74	Agree	
P13: Sustainable Drainage Systems	78	Agree with additions	<ol style="list-style-type: none"> <li>1. Reference is made to Policy P10, but this should be P13.</li> <li>2. It would be helpful to include a hierarchy of SuDS options and their effectiveness.</li> <li>3. Again, there should be reference to Neighbourhood Plans in this section as local situations need to be carefully acknowledged and referenced.</li> </ol>

P14: Regionally Important Geological/ Geomorphological Sites	82	Agree	
<b>Additional Comments on Protecting</b>			None
<b>Design</b>	84		
D4: Achieving High Quality Design and Local Distinctiveness	87	Agree to an extent	<ol style="list-style-type: none"> <li>1. This is an extremely important policy area and it needs to ensure that the full spec provided in the 2003 policies is carried forward into these new ones.</li> <li>2. Reference to Neighbourhood Plans should be included under the General Principles point 1.</li> <li>3. Reference to the existing build form should be included and an element of consideration to space around buildings.</li> <li>4. All points made are valuable, but it is a little hard to believe GBC will see these through when they have just approved two planning applications that will lead to the building of 31 new homes in West Horsley's Conservation Area, with a density double that of the immediate area.</li> <li>5. Within 'Character of Development' as well as including town centre views at point e reference should be made to strategic views in Neighbourhood Plans and views from and into the AONB/Surrey Hills Management Plan.</li> </ol>
D5: Privacy and Amenity	92	Agree	<ol style="list-style-type: none"> <li>1. Needs reference to respecting and protecting dark skies.</li> <li>2. Clarity around the use of extensive glazing and the impact on protected areas, whilst also protecting the privacy of occupiers is also required within this policy.</li> <li>3. Replanting and boundary treatments should be included with in this encouraging native hedges rather than close boarded fencing. Boundary treatments should reflect the local character and blend in with the existing landscape setting.</li> </ol>

D6: Shopfront Design	94	Agree. Needs additions	<ol style="list-style-type: none"> <li>1. The need to respond to local character and setting should be included.</li> <li>2. Shopfronts should also respect the character and style of the existing building.</li> </ol>
D7: Advertisements, hanging signs and illuminations	96	Agree	This is very clear and specific
D8: Public Realm	98	Agree	This is very clear and specific
D9: Residential Intensification	101	Agree	<p>This is very clear and specific</p> <ol style="list-style-type: none"> <li>1. A reference to Neighbourhood Plans for particular local requirements is required. This should have been referenced as guidance in the decisions for 19/P/01210 and 20/P/00409 in West Horsley's Conservation Area. It is galling to read this and have had both these applications approved whereby the density for 31 houses at 20 The Street is double that of the immediate surrounding area.</li> </ol>
D10: 'Agent of Change' and Noise Impacts	104	Agree	<p>A very welcome policy.</p> <ol style="list-style-type: none"> <li>1. Reference could be included on the impact of noise on wildlife and the local environment.</li> </ol>
D11: Corridor of the River Wey and Guildford and Godalming Navigations	110	Agree	<ol style="list-style-type: none"> <li>1. Point 5 should make reference to Dark Skies (page 111)</li> </ol>
<b>Additional Comments on Design</b>			None
<b>Climate Change and Sustainability</b>	113		
D12: Sustainable and Low Impact development	119	Agree	<ol style="list-style-type: none"> <li>1. Strong reference needed to the reuse of existing buildings and demolition materials given that construction waste accounts</li> </ol>

			for around a third of the UK's construction and demolition business.
D13: Climate Change Adaption	126	Agree	<ol style="list-style-type: none"> <li>1. Reference required to Neighbourhood Plans SuDS schemes.</li> <li>2. Given how critical this is, has this policy been benched marked against other Councils policies known to be exemplary in the Climate Change approach?</li> </ol>
D14: Climate Change Mitigation	130	Agree	As above.
D15: Large Scale Renewable and Low Carbon Energy	132		<ol style="list-style-type: none"> <li>1. Before commenting on this the process for assessment of these areas needs to be determined, and an indication of where these areas are likely to be located.</li> <li>2. The focus should be on Brownfield land rather than Green Belt.</li> <li>3. The likely impact on biodiversity is a significant concern.</li> </ol>
<b>Additional Comments on Climate Change</b>			None
<b>Historic Environment</b>	136		
D16: Designated Heritage Assets	142	Agree but see note	More emphasis should be put on the setting, including the immediate area outside the curtilage.
D17: Listed Buildings	148	Agree but see note	Should also reference Neighbourhood Plans and the character area assessments in taking decisions particularly with regards to settings of listed buildings within settlement areas.
D18: Conservation Areas	152	Agree but see note	<ol style="list-style-type: none"> <li>1. Should refer to Neighbourhood Plans.</li> <li>2. GBC should take note of its own policies when taking decisions that impact on Conservation Areas, particularly with regard to density and keeping open spaces.</li> <li>3. West Horsley has had a Conservation Area Character Appraisal but is stuck between the end of consultation and adoption, the</li> </ol>

			<p>Policy should ensure that all future Appraisals are included not just those listed.</p> <p>4. Particular reference to methods of boundary identification between properties with recommendation that no close boarded fencing is used and only native species planted.</p>
D19: Scheduled Monuments & Registered Parks and Gardens	157	Agree but see note	Views from Registered Gardens and Parks should be protected as much as views into them. There are places where an historic park has been broken up in the past but the surrounding area still retains elements of that setting and it needs to be protected.
D20: Non-Designated Heritage Assets	162	Agree	
<b>Additional Comments on Historic Environment</b>			
<b>Infrastructure</b>	168		
ID5: Protecting Open Space	170	Agree with additions	<ol style="list-style-type: none"> <li>1. Point 4, page 171 needs clarifying.</li> <li>2. This policy should emphasise that the loss of open space will be resisted and that provision will be positively encouraged.</li> <li>3. Reference to Neighbourhood Plans should be included.</li> <li>4. Reference to Local Green Spaces must be included – this level of designation has the same value as Green Belt and cannot be ignored, especially as these spaces are identified through Neighbourhood Plans.</li> </ol>
ID6: Open Space in New Developments	173	Agree with additions	<ol style="list-style-type: none"> <li>1. Crucial to provide space for new communities and links to other open spaces via the establishment of green networks/infrastructure.</li> <li>2. Reference should be made to increased well being for residents and the value of the outdoors.</li> </ol>
ID7: Sport, Recreation and Leisure Facilities	179	Agree	

ID8: Community Facilities	181	Agree with additions	<ol style="list-style-type: none"> <li>1. Needs reference to Neighbourhood Plans under the Local Strategies and evidence list.</li> <li>2. Community Facilities should be a requirement of all strategic sites, and housing developments that propose to deliver 500 new homes – thresholds for these needs defining.</li> <li>3. People need to be able to walk to a shop or get a local paper otherwise the sites will not be sustainable.</li> <li>4. The value of Community Facilities cannot be emphasised enough – they should be encouraged and promoted at every opportunity to capitalise on the growth of the community spirit as a result of Covid-19.</li> </ol>
ID9: Retention of Public Houses	187	Agree	<ol style="list-style-type: none"> <li>1. Reference to Neighbourhood Plans should be made where local pubs add value to the community and have been identified as assets of community value – there are opportunities for pubs to expand their services to the community and these should be encouraged.</li> </ol>
ID10: Achieving a Comprehensive Guildford Borough Cycle Network	194	Agree	<ol style="list-style-type: none"> <li>1. Achieving a cycle network across the Borough must be seen as a priority especially given the recent months where the emphasis has been on maximising the use of private transport vs public, and increased bike ownership across the Borough. Like it or not, cycling is here to stay and the Borough has a responsibility to provide safe and accessible cycle routes, both for work and leisure.</li> <li>2. Reference to Neighbourhood Plans should be included where possible cycle ways have been or could be identified.</li> <li>3. Green networks/infrastructure are critical to our future.</li> <li>4. Looking at the map, some joined up thinking to make the connections work is obviously required.</li> </ol>

ID11: Parking Standards	197	Agree to an extent	<ol style="list-style-type: none"> <li>1. It is essential that the Borough's Parking Standards are brought up to date as soon as possible, and that they should be inline with SCC. There is no point in any discrepancy between the two.</li> <li>2. Parking spaces in residential areas outside the town centre are not realistic for 3 or more bedrooms, and certainly should be increased for houses with 4 or more bedrooms, with allowance for the increase car usage among young adults. Two of the new developments proposed for West Horsley are located in unsustainable areas with extremely limited public transport so will be car reliant.</li> </ol>
<b>Additional Comments on Infrastructure</b>			<ol style="list-style-type: none"> <li>1. The measure of the number of dwellings and the associated provision of open space seems inconsistent with GBC's reference to major applications being 10 or more houses. This is out of sync and needs clarity.</li> <li>2. Opportunities to provide open space should also be seen as an opportunity to reinforce local character and landscape settings e.g. increased provision could offset smaller garden provision.</li> <li>3. The importance of open space needs to be highlighted with reference to mental health and well being needs, and the growing importance of community space should be acknowledged.</li> <li>4. Where there is no guidance through the NPPF, GBC could be more demanding of developers to retain the character of our Borough.</li> <li>5. With all these policy proposals there needs to be reference to Neighbourhood Plans.</li> <li>6. There is no mention of Local Green Spaces. These are not included in P2 so need to be covered within this section of Policies.</li> </ol>

