



Burpham Neighbourhood Forum

1 Bowers Cottages

Bowers Lane

Burpham

Guildford

Surrey GU4 7ND

3rd February 2015

Mr Dan Knowles

Guildford Borough Council – Planning Department

Millmead

Guildford

Surrey GU2 4BB

Dear Mr Knowles

BNF 17 – Response to Health check Comments

Further to Mr Ascrofts 'Health Check' of the Burpham Neighbourhood Plan, we set out below our responses to his suggestions and observations, and actions taken to amend the plan as a result. Mr Ashcroft divided his report into general comments and policy specific comments we have therefore followed this layout below.

General Comments

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

2. We note his 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.
3. Our introduction has been amended to include a vision statement.
4. We note his suggestion for a separate description of the area but we believe that BNF 3 (Appendix 2) Character Descriptions of Burpham along with our Local Green Space document BNF 4 adequately describes our local character. In addition an enhanced introduction to BNF 3 has been incorporated into the submission document.
5. Regarding his suggestion for additional clarity accompanying BNF6, this has been done. Please see addendum to BNF 11.
6. Regarding his 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 policies 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.
7. Regarding his 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.
8. Regarding policy wording, a number of policies have been amended. Please refer to the Addendum to BNF 11 for examples.
9. In relation to his comment regarding land use and non-land use policies, 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.

10. In relation to the notes accompanying the maps, in BNF 2, to maintain the quality and detail of the maps when printed at A4 we have decided to keep the narrative on a separate page, noting that Map 3 can be expanded electronically so that road names are clear.
11. 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 his 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 his comment about a tracked changes version set of policies, we note this is often during the formation of a Local Plan however this is not a requirement of neighbourhood planning. We would prefer to draw the readers attention the Regulation 15 version of the policies.
12. We note his comment that some of our responses are insubstantial in relation to the consultees’ comments, so we have expanded relevant responses (see Addendum to BNF 11).
13. We note his 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 have also re-worded some elements in BNF 11 where they do not assist.

Specific Comments on Policies

14. We note his observations on the wording of some policies. These has been amended where appropriate. (please cross refer between Nov 14 and Feb 15 Reg 15 submission documents).

15. B-EN1: The Forum has considered his comments on the Green Belt. The Forum is keen to stress the importance of Green Belt to the local community, whilst recognising the need to remain in accord with the NPPF. Therefore, the Policy will be retained but has been reworded.
16. B-EN2: We have amended this to make specific reference to B-FD2.
17. B-EN3 & B-EN4: These policies have been amended to reflect his suggestions and provide greater certainty to the decision maker.
18. B-EN5: This policy has been rephrased, based on his suggestion. The buildings listed are the most important examples of our heritage, hence worthy of specific note. It is noted within the policy that this list is not an exclusive list. This policy has been reworded to address his feedback. The buildings listed are of particular importance to the Ward.
19. B-EN6: The Forum has decided to remove this policy from the plan in its entirety. Its aims have been amalgamated into B-FD1.
20. B-EN7: (Now B-EN6) Following the deletion of the Natural Features Policy explained above, minor alterations have been made to this policy to add clarity.
21. B-FD1: The wording has been extensively re-drafted.
22. B-FD2: Minor amendments have been made.
23. B-FD3: We have adopted his suggested wording as a template for this revised policy.
24. B-FD4: This policy has been extensively re-worded.
25. B-EMP1: We note his comments but wish to retain this policy to encourage and increase support for home working generally.

- 26.B-EMP2: We have added an inset Map (1) Appendix 1. In addition, much of the text has been removed from the policy and made into supporting text. We have also incorporated elements of his suggested wording to the policy itself.
- 27.B-EM3: The policy now refers to employment uses rather than B Class uses. It also adopts his suggested wording to support employment expansion. In addition, the final paragraph has been moved to supporting text.
- 28.B-T1: We note his comments on cycle storage but wish to promote maximum flexibility and innovation for the developer to meet these requirements. In relation to visitor parking, the policy has been clarified. We note his comment on the section dealing with non-residential parking. However you will note the section of the policy is worded to apply Guildford's maximum standards as a MINIMUM standards in Burpham. The policy has been clarified accordingly.
- 29.B-T2C & 2F: We note his comments regarding the nature of these policies and what they are seeking to achieve. The policies have been re-configured and specific reference to Map 2 of Appendix 1 is made.
- 30.B-C1: The Forum has decided to adopt a revised wording of this policy based on his wording.

We trust these amendments are self explanatory. We thank Mr Ashcroft for his third party observations which have been helpful in finalising the documents prior to the Regulation 16 stage.

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'R. Pollock', written in a cursive style.

Ros Pollock
Chairman, Burpham Neighbourhood Forum