

# GUILDFORD BOROUGH COUNCIL



## BILLINGTON MAYOR

Contact Officer:

John Armstrong,  
Democratic Services and Elections Manager  
Tel: 01483 444102

27 April 2020

To the Councillors of Guildford Borough Council

You are hereby summoned to attend a remote meeting of the Council for the Borough of Guildford to be held on **TUESDAY, 5 MAY 2020** commencing at 7.00 pm. The meeting can be accessed remotely via Microsoft Teams in accordance with the provisions of The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020.



James Whiteman  
Managing Director

Millmead House  
Millmead  
Guildford  
Surrey GU2 4BB

[www.guildford.gov.uk](http://www.guildford.gov.uk)

### WEBCASTING NOTICE

This meeting will be recorded for live and/or subsequent broadcast on the Council's website in accordance with the Council's capacity in performing a task in the public interest and in line with the Openness of Local Government Bodies Regulations 2014. The whole of the meeting will be recorded, except where there are confidential or exempt items, and the footage will be on the website for six months.

If you have any queries regarding webcasting of meetings, please contact Committee Services.

Quorum: 12



## THE COUNCIL'S STRATEGIC FRAMEWORK

### Vision – for the borough

For Guildford to be a town and rural borough that is the most desirable place to live, work and visit in South East England. A centre for education, healthcare, innovative cutting-edge businesses, high quality retail and wellbeing. A county town set in a vibrant rural environment, which balances the needs of urban and rural communities alike. Known for our outstanding urban planning and design, and with infrastructure that will properly cope with our needs.

### Three fundamental themes and nine strategic priorities that support our vision:

- |                     |  |
|---------------------|--|
| <b>Place-making</b> | Delivering the Guildford Borough Local Plan and providing the range of housing that people need, particularly affordable homes |
|                     | Making travel in Guildford and across the borough easier   |
|                     | Regenerating and improving Guildford town centre and other urban areas   |
| <b>Community</b>    | Supporting older, more vulnerable and less advantaged people in our community  |
|                     | Protecting our environment   |
|                     | Enhancing sporting, cultural, community, and recreational facilities   |
| <b>Innovation</b>   | Encouraging sustainable and proportionate economic growth to help provide the prosperity and employment that people need       |
|                     | Creating smart places infrastructure across Guildford  |
|                     | Using innovation, technology and new ways of working to improve value for money and efficiency in Council services             |

### Values for our residents

- We will strive to be the best Council.
- We will deliver quality and value for money services.
- We will help the vulnerable members of our community.
- We will be open and accountable.
- We will deliver improvements and enable change across the borough.

<b>Time limits on speeches at full Council meetings:</b>	
Public speaker:	3 minutes
Response to public speaker:	3 minutes
Questions from councillors:	3 minutes
Response to questions from councillors:	3 minutes
Proposer of a motion:	10 minutes
Secunder of a motion:	5 minutes
Other councillors speaking during the debate on a motion:	5 minutes
Proposer of a motion's right of reply at the end of the debate on the motion:	10 minutes
Proposer of an amendment:	5 minutes
Secunder of an amendment:	5 minutes
Other councillors speaking during the debate on an amendment:	5 minutes
Proposer of a motion's right of reply at the end of the debate on an amendment:	5 minutes
Proposer of an amendment's right of reply at the end of the debate on an amendment:	5 minutes

## **AGENDA**

### **1. APOLOGIES FOR ABSENCE**

### **2. DISCLOSURES OF INTEREST**

To receive and note any disclosable pecuniary interests from councillors. In accordance with the local Code of Conduct, a councillor is required to disclose at the meeting any disclosable pecuniary interest (DPI) that they may have in respect of any matter for consideration on this agenda. Any councillor with a DPI must not participate in any discussion or vote regarding that matter and they must also withdraw from the meeting immediately before consideration of the matter.

If that DPI has not been registered, the councillor must notify the Monitoring Officer of the details of the DPI within 28 days of the date of the meeting.

Councillors are further invited to disclose any non-pecuniary interest which may be relevant to any matter on this agenda, in the interests of transparency, and to confirm that it will not affect their objectivity in relation to that matter.

### **3. MINUTES (Pages 5 - 22)**

To confirm the minutes of the meeting of the Council held on 5 February 2020.

### **4. MAYOR'S COMMUNICATIONS**

To receive any communications or announcements from the Mayor.

### **5. LEADER'S COMMUNICATIONS**

To receive any communications or announcements from the Leader of the Council.

### **6. PUBLIC PARTICIPATION**

To receive questions or statements from the public.

### **7. QUESTIONS FROM COUNCILLORS**

To hear questions (if any) from councillors of which due notice has been given.

8. **COVID19 EMERGENCY BUDGET** (Pages 23 - 34)
9. **REGULATION 18 CONSULTATION ON LOCAL PLAN: DEVELOPMENT MANAGEMENT POLICIES** (Pages 35 - 394)
10. **NON-ATTENDANCE AT MEETINGS: PROPOSED DISPENSATION FROM THE REQUIREMENTS OF SECTION 85 LOCAL GOVERNMENT ACT 1972** (Pages 395 - 398)
11. **DESIGNATION OF THE COUNCIL'S MONITORING OFFICER** (Pages 399 - 400)
12. **MINUTES OF THE EXECUTIVE** (Pages 401 - 436)

To receive and note the attached minutes of the meetings of the Executive held on 7 and 21 January and 18 February 2020, and the list of decisions taken by the Leader of the Council on 24 March 2020.
13. **COMMON SEAL**

To order the Common Seal to be affixed to any document to give effect to any decision taken by the Council at this meeting.

## GUILDFORD BOROUGH COUNCIL

Draft Minutes of a meeting of Guildford Borough Council held at Council Chamber, Millmead House, Millmead, Guildford, Surrey GU2 4BB on Wednesday 5 February 2020

- \* Councillor Richard Billington (Mayor)
- \* Councillor Marsha Moseley (Deputy Mayor)

- |                                |                              |
|--------------------------------|------------------------------|
| * Councillor Paul Abbey        | Councillor Ted Mayne         |
| * Councillor Tim Anderson      | * Councillor Julia McShane   |
| * Councillor Jon Askew         | * Councillor Ann McShee      |
| Councillor Christopher Barrass | * Councillor Bob McShee      |
| * Councillor Joss Bigmore      | * Councillor Masuk Miah      |
| * Councillor David Bilbé       | * Councillor Ramsey Nagaty   |
| * Councillor Chris Blow        | * Councillor Susan Parker    |
| * Councillor Dennis Booth      | * Councillor George Potter   |
| * Councillor Ruth Brothwell    | Councillor Jo Randall        |
| * Councillor Colin Cross       | * Councillor John Redpath    |
| Councillor Graham Eyre         | * Councillor Maddy Redpath   |
| * Councillor Andrew Gomm       | * Councillor Caroline Reeves |
| * Councillor Angela Goodwin    | * Councillor John Rigg       |
| * Councillor David Goodwin     | * Councillor Tony Rooth      |
| * Councillor Angela Gunning    | Councillor Will Salmon       |
| * Councillor Gillian Harwood   | Councillor Deborah Seabrook  |
| Councillor Jan Harwood         | * Councillor Pauline Searle  |
| * Councillor Liz Hogger        | * Councillor Patrick Sheard  |
| * Councillor Tom Hunt          | * Councillor Paul Spooner    |
| * Councillor Gordon Jackson    | * Councillor James Steel     |
| * Councillor Diana Jones       | * Councillor James Walsh     |
| * Councillor Steven Lee        | * Councillor Fiona White     |
| * Councillor Nigel Manning     | * Councillor Catherine Young |

\*Present

Honorary Alderman Terence Patrick was also in attendance

The Council stood in silent tribute to the memory of former councillor Jill Chan, who had passed away recently.

### **CO105 APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors Graham Eyre, Jan Harwood, Ted Mayne, Jo Randall, Will Salmon and Deborah Seabrook, and from Honorary Freeman Jen Powell and Honorary Aldermen Catherine Cobley, Sarah Creedy, Jayne Marks, and Lynda Strudwick.

### **CO106 DISCLOSURES OF INTEREST**

There were no disclosures of interest.

### **CO107 MINUTES**

The Council confirmed, as a correct record, the minutes of the meeting held on 3 December 2019 and the extraordinary meeting held on 16 January 2020. The Mayor signed the minutes.

**CO108 MAYOR'S COMMUNICATIONS**

The Mayor reported that his final charitable event of his mayoral year would be the Mayoress' "Sparkling Springtime Afternoon Tea", taking place at the Guildhall on Tuesday 31 March 2020 between 3pm and 5pm. Tickets were priced at £25, and councillors were invited to contact Kate Foxton for further details.

The Mayor had recently opened the impressive facilities at the medical training school at the University's Grainger building, which included an ambulance simulator, and the Veterinary School.

The Mayor had also visited a symposium on tinnitus at the Royal Surrey County Hospital attended by 800 residents.

**CO109 LEADER'S COMMUNICATIONS**

The Leader reported that since 31 January 2020, she had been contacted by a number of EU citizens living in the borough concerned about securing settled status in the UK and outlined the assistance that the Council was providing in this regard.

**CO110 PUBLIC PARTICIPATION**

Mr Gavin Morgan, on behalf of the Guildford Heritage Forum, addressed the Council meeting in respect of the centenary of the closure of the Chilworth Gunpowder Mills, and the need to utilise modern technology to help people engage with the past.

The Lead Councillor for Tourism, Leisure, and Sport, Councillor James Steel responded to Mr Morgan.

**CO111 QUESTIONS FROM COUNCILLORS**

Councillor Susan Parker asked the Lead Councillor for Planning, Regeneration, and Housing Delivery, Councillor Jan Harwood, the question set out below. In the absence of the Lead Councillor, the Leader of the Council's comments in response to each element of the question is set out in italicised text below:

"In July the full Council voted for a masterplan and a brownfield review to consider the scope of the urban area to accommodate housing and protect our rural areas, not least due to the impact of urban sprawl on climate change and our climate change commitments.

Could the Lead Councillor for Planning, Regeneration, and Housing Delivery please report on progress to date, and the implications for the Local Plan?

*Since the Council resolved to bring forward a new Masterplan DPD the following has been undertaken:*

- (1) David Lock Associates have been appointed and completed a study to evaluate the previously undertaken work in relation to the town centre and provide recommendations as to the next steps and the future engagement of consultants.*
- (2) People and Places have been appointed and completed a consultation with 9 key Guildford stakeholder groups through an interview and feedback process to help establish that we are clear in relation to the vision for the town centre.*
- (3) Work is also underway with the Environment Agency in relation to Guildford's Flood Alleviation Scheme. The outcome of this scheme will influence the potential outcome of the masterplan work and may create a material change in the functional flood plain in terms of risk.*

Council - 5 February 2020

- (4) *A Masterplan Briefing note will go to CMT on 18 February 2020 setting out how the Masterplan proposal will be progressed.*
- (5) *Budget approval for the year 2020-21 is being sought at this Council meeting.*
- (6) *The procurement of a Masterplan consultancy is commencing.*
- (7) *A Masterplan Programme Board is in the process of being set up.*

*The production of a Masterplan DPD would be required to be consistent with the boroughwide policies contained within the Adopted Local Plan. The housing site allocations in the Adopted plan outside of the specific town centre area will remain unchanged. The Masterplan would only relate to a specifically defined geographic area identified as part of the plan making process.*

In particular can he please comment on the following questions:

- (a) we have recently been informed that any proposed Mastervision for the town centre will be subject to DPD rules. I understand this will involve a Regulation 18 then a Regulation 19 consultation, followed by an examination in public with a Planning Inspector, before any approval and ratification. I understand the current DPDs which are due to come to consultation this spring and will follow this process are likely to be approved towards the end of this administration ie in Autumn 2022 at the earliest, or possibly in Spring 2023 depending on the level of responses, ie towards the end of this current Council administration at the earliest. Could a timetable for the consideration and adoption of the proposed Mastervision (since work on this, or even the remit, has not yet been started) be outlined for the benefit of councillors?

*The Executive will be asked to approve an updated Local Development Scheme (LDS) on 24 March 2020, together with a report on the proposed Regulation 18 Development Management DPD for consultation, which will be recommended to full Council on 7 April for approval. The anticipated date for adoption of the Development Management DPD is September 2022. It is considered that inclusion of timeframes for the Town Centre Masterplan DPD would be best included in the LDS once there is further certainty emerging from work on the evidence base including transport, flooding and site assembly which would need to occur in advance of the production of a Regulation 18 document.*

- (b) what impact will this protracted timetable have on the development of brownfield sites within the urban area, especially those which are not yet included in the Local Plan as allocated sites? Given that some urban sites have already suffered considerable planning blight for years, is it possible for this process to be expedited so we don't have derelict areas in our town centre for years to come?

*There is nothing stopping brownfield sites within the town centre, that are not within the Local Plan, coming forward for appropriate development now. The Local Plan Policy S3: Delivery of development and regeneration within Guildford Town Centre provides a positive context that seeks to achieve a more efficient use of land and encourages regeneration and accelerated housing delivery within the town centre.*

- (c) can the Lead Councillor comment on progress on the North Street site and its capacity for providing urban, and reasonably priced/ social housing, and any consequential impact on the Local Plan and the housing requirement?

*The Council is currently in negotiations with a potential developer in relation to land at North Street. A report to update councillors on progress will be considered at the next meeting of the Executive on 18 February 2020.*

- (d) what consequential impact will there be for greenfield sites if the Mastervision is delayed for a considerable period?

*The Masterplan will be for the town centre and will not include any Green field sites. The Adopted Local Plan makes provision to actually meet housing need up to 2034. Consideration will need to be given as to the need to review the Plan five years after adoption. As has been noted by the Planning Inspector, Mr Justice Ouseley, and the Secretary of State, the plan has built in flexibility in the form of 'headroom' to give the plan every chance of meeting needs over the plan period.*

Arising from a supplementary question, which sought reassurance that there would be no delay to use of brown field sites arising from the masterplanning process, and that councillors were updated and able to provide input into the decision-making process as it goes forward. The Leader of the Council responded by stating that she could see no reason for any delay on use of brownfield sites, subject to the submission of planning applications in that regard. The Leader also referred to the current consultation on various draft SPDs, in which councillors and the public could submit their comments.

In response to further supplementary questions regarding the importance of the master plan and who was responsible for taking it forward, the Leader of the Council agreed that, in common with all councillors, the master planning of the town was important as demonstrated by the written response to the question, but reiterated that until the budget was approved, only preparatory work could be undertaken. The Leader also confirmed that Councillor Rigg, as the lead councillor, was trying very hard to move the master plan forward and he had full support from officers and councillors, but acknowledged that the process was complicated.

#### **CO112 PAY POLICY STATEMENT 2020-21**

Under Section 39 of the Localism Act 2011, the Council was required to consider and approve a pay policy statement for the financial year ahead and publish it on its website. The Council therefore considered the Pay Policy Statement covering 2020-21, which had set out the elements of pay and other benefits paid to staff and in particular the most senior employees.

The pay award was made in July each year and the Council was currently consulting with Unison on this award. Following the redesign of the organisational structure in Phase A of the Future Guildford transformation programme, a new Head of Service salary band for the most senior management level below Directors had been introduced to provide support to the Directors to reflect the reduction in the number of director posts.

Councillors noted that the Council would continue to pay at the Real Living Wage for outside London, which was currently £9.30 per hour, at the bottom of the pay scale. This would aid recruitment difficulties in attracting and retaining key staff.

Councillors also noted that the restructure of the Corporate Management Team had been completed as part of Phase A of Future Guildford and that the recruitment process for the appointment of a new Director of Service Delivery had commenced. As the remuneration package that the Council was offering in respect of this appointment would exceed £100,000, the Council was invited to approve it in accordance with paragraph 12.4 of the Pay Policy Statement for 2020-21. The elements of the remuneration package for the role of Director of Service Delivery were set out in a table on the Order Paper circulated at the meeting.



The Lead Councillor for Finance and Assets, Customer Service, Councillor Joss Bigmore proposed, and the Leader of the Council, Councillor Caroline Reeves, seconded the motion to adopt the Pay Policy Statement for 2020-21, approve the proposed remuneration package associated with the appointment of a Director of Service Delivery and authorise the Employment Committee to make an appropriate offer to the successful candidate.

During the debate and following a question as to why the Council was still providing lease cars to certain staff, bearing in mind the Council's zero carbon emissions aspiration, the Leader of the Council explained that an offer of a car was essential in order to attract the best candidates. However, it was noted that the Council was moving towards a fully electric lease car fleet.

It was also suggested that the Council should consider increasing the pay to its lowest paid staff at a rate higher than the real living wage to reflect the high cost of living in Guildford, and ensuring that the Council's contractors pay the real living wage to their employees. The Leader indicated that the Council was very mindful of these matters

Having considered the motion, the Council

RESOLVED:

- (1) That the Pay Policy Statement for the 2020-21 financial year, attached at Appendix 1 to the report submitted to the Council, be approved.
- (2) That the proposed remuneration package associated with the appointment of a Director of Service Delivery at a sum exceeding £100,000, as set out in the table on the Order Paper, be approved.
- (3) That the Employment Committee be authorised to make the appropriate offer to the successful candidate for appointment as Director of Service Delivery.

Reason:

To comply with the Localism Act 2011 (Section 39).

### **CO113 CAPITAL AND INVESTMENT STRATEGY 2020-21 TO 2024-2025**

The Council considered a report on the Council's capital and investment strategy, including the capital programme new bids plus the requirements of the Prudential Code and the investment strategy covering treasury management investments, commercial investments, the Treasury Management Code, and the Ministry of Housing, Communities and Local Government (MHCLG) Statutory Guidance.

The strategy was intended to give an overview of how capital expenditure, capital financing and treasury management activity contributed to the provision of services along with an overview of how associated risk was managed and the implications for future financial sustainability.

In relation to the capital programme, the Council had a current underlying need to borrow for the general fund capital programme of £360 million, including bids put forward by officers, with a net cost to the Council of £47.8 million.

Whilst some capital receipts or revenue streams may arise as a result of investment schemes, in most cases this was currently uncertain and too early to make assumptions. Some information had been included in the capital vision highlighting the potential income. It was likely that there were cash-flow implications of the development schemes, where income would come in after the five-year time horizon and the expenditure would be incurred earlier in the programme.

All projects would be funded by general fund capital receipts, grants and contributions, reserves and finally borrowing. It was not currently known how each scheme would be funded and, in the case of development projects, what the delivery model would be. To ensure the Council demonstrated that its capital expenditure plans were affordable, sustainable and prudent, Prudential Indicators had been set that must be monitored each year. These were set out in Appendix 1 to the report submitted to the Council.

The capital programme included several significant regeneration schemes, on the assumption that they would be financed from General Fund resources. However, subject to detailed design of the schemes, there could be scope to fund them from HRA resources rather than General Fund resources in due course. Detailed funding proposals for each scheme would be considered when the Outline Business Case for each scheme was presented to the Executive for approval.

Details of the main areas of expenditure in the capital programme were set out in the report.

The report included a summary of the new bids submitted, the position and profiling of the current capital programme (2019-20 to 2023-24) and the capital vision schemes.

The Corporate Management Team, the Lead Councillor for Finance and Assets, Customer Service, the Joint Executive Advisory Board Budget Task Group, the Joint EAB, and the Executive had all reviewed the bids presented in the report.

The report had also included the Council's Minimum Revenue Provision policy and the Prudential Indicators.

In relation to Treasury management, the Council noted that officers carried out the treasury management function within the parameters set by the Council each year and in accordance with the approved treasury management practices.

The budget for investment income in 2020-21 was £1.684 million, based on an average investment portfolio of £79.8 million, at an average rate of 2.18%. The budget for debt interest paid was £5.656 million, of which £5.06 million related to the HRA.

In relation to non-financial investments and investment strategy, the Council noted that local authorities could invest to support public services by lending to or buying shares in other organisations (service investments) or to earn investment income (commercial investments where this was the main purpose). The Council had £161.244 million of investment property on its balance sheet, generating a return of £9 million and a current yield of 6.3%.

The criteria for purchasing investment property, when originally approved were to achieve a minimum qualitative score and yield an internal rate of return (IRR) of at least 8%. It was now recommended that the IRR be changed to 5.5% due to the change in the market forces and recognition of the move to investing for strategic purposes, for example economic growth and housing and regeneration.

The Council had invested £12.251 million in its housing company – North Downs Housing (NDH), via 40% equity to Guildford Borough Council Holdings Limited (£4.903 million) (who in turn passed the equity to NDH) and 60% loan direct to NDH (£7.348 million) at a rate of base plus 5% (currently 5.75%). The loan was a repayment loan in line with the NDH business plan.

The Capital and Investment Strategy 2019-20 to 2023-24 had also been considered by the Joint Executive Advisory Board at its meeting on 9 January 2020, by the Corporate Governance and Standards Committee at its meeting on 15 January 2020, and by the Executive on 21 January 2020.

Upon the motion of the Lead Councillor for Finance and Assets, Customer Service, Councillor Joss Bigmore, seconded by the Leader of the Council, Councillor Caroline Reeves, the Council

RESOLVED:

- (1) That the General Fund capital estimates, as shown in
  - (a) The updated and revised Appendices 3 and 4 to the report submitted to the Council (current approved and provisional schemes), as amended to include the new bids approved by the Executive on 21 January 2020 set out in Appendix 2;
  - (b) Appendix 5 (schemes funded from reserves); and
  - (c) Appendix 6 (s106 schemes),be approved.
- (2) That the Minimum Revenue Provision policy, referred to in section 5 of the report be approved.
- (3) That the capital and investment strategy be approved, specifically the Investment Strategy and Prudential Indicators contained within the report and Appendix 1.

Reasons:

- To enable the Council to approve the Capital and Investment strategy for 2020-21 to 2024-25.
- To enable the Council, at its budget meeting on 5 February 2020, to approve the funding required for the new capital investment proposals.

#### **CO114 HOUSING REVENUE ACCOUNT BUDGET 2020-21**

The Council considered a detailed report on the draft Housing Revenue Account (HRA) budget and Housing Capital Investment Programme for 2020-21.

The 2020-21 estimates had been predicated on the assumptions, ambitions and priorities contained in the HRA business plan.

The report had proposed to increase Council house rents by 2.7% in line with the Rent Standard 2020 (issued by the Regulator of Social Housing) and the Policy Statement for Rents on Social Housing (Issued by The Ministry of Housing, Communities and Local Government).

A 2.7% increase in garage rents was also proposed from April 2020, based on the September 2019 Consumer Price Index (CPI) plus 1%.

The report, which included details of progress with the new build programme, together with the proposed investment programme in tenants' homes, had also been considered by the Joint Executive Advisory Board at its meeting on 9 January 2020. The Board had indicated its agreement with the recommendations both to the Executive and Council.

At its meeting held on 21 January 2020, the Executive had, subject to Council approving the budget at this meeting, approved the projects forming the HRA major repair and improvement programme, as set out in Appendix 3 to the report and had authorised the Director of Service Delivery to reallocate funding between approved schemes to make best use of the available resources, and to set rents for new developments.

Upon the motion of the Lead Councillor for Housing, Access and Disability, Homelessness, Councillor Angela Goodwin, seconded by the Lead Councillor for Finance and Assets, Customer Service, Councillor Joss Bigmore, the Council

**RESOLVED:**

- (1) That the HRA revenue budget 2020-21, as set out in Appendix 1 to the report submitted to the Council, be approved.
- (2) That the 2.7% rent increase in line with the Rent Standard 2020 and Policy Statement 2019 be approved for 2020-21.
- (3) That the fees and charges for HRA services for 2020-21, as set out in Appendix 2 to the report, be approved.
- (4) That a 2.7% increase in garage rents for 2020-21 be approved.
- (5) That the Housing Investment Programme as set out in Appendix 4 to the report (current approved and provisional schemes), as amended to include the bids approved by the Executive at its meeting on 21 January 2020, be approved.

**Reason:**

To enable the Council to set the rent charges for HRA property and associated fees and charges, along with authorising the necessary revenue and capital expenditure to implement a budget, this is consistent with the objectives outlined in the HRA Business Plan.

**CO115 BUSINESS PLANNING - GENERAL FUND BUDGET 2020-21**

The Council considered a detailed report on the draft General Fund Revenue budget for 2020-21, which included a Council Tax requirement of £10,192,858 (excluding parish precepts) and a Council Tax increase of £5 per year (3%), resulting in a Band D charge of £176.82.

The provisional Local Government Finance Settlement (LGFS) for 2020-21 had been received on 20 December 2019. The figures included in the outline budget presented to the Executive on 26 November 2019 reflected the information contained in the settlement.

The Settlement Funding Assessment comprising the local share of business rates, and revenue support grant, was set out in the provisional LGFS. The settlement had been in line with expectations which enabled the Council to retain £2.929 million of business rates in 2020-21, an increase of 1.69% on 2019-20.

In determining that the Council's Core Spending Power had increased by £400,000, the Government had assumed that the Council would raise the Council Tax by the maximum amount (£5 or 3% whichever was the higher).

The provisional award of New Homes Bonus (NHB) for 2020-21 totalling £851,019, was lower than the £1,066,849 included in the outline budget reported to the Executive in November. Although 482 new homes had been added to the Council Tax base in 2019-20, which represented a 0.71% increase in tax base, the deadweight for qualifying NHB had been set at 0.4%, which was the minimum expectation Government had for the development of new housing.

The Joint EAB Budget Task Group and Joint Executive Advisory Board had considered the outline budget at their meetings on 8 and 20 November 2019 respectively.

The Chief Finance Officer (CFO) presented her statutory report to the Council, a copy of which was appended to the main report. The CFO's report provided information about the strategic context within which the budget had been prepared, the medium-term financial plan, the robustness of the estimates, adequacy of reserves and budget risks.

The financial monitoring report for the first eight months of 2019-20 had been reported to the Corporate Governance and Standards Committee on 15 January 2020. The projected net expenditure on the General Fund for the current financial year had been estimated to be £96,766 less than the original estimate.

The CFO, in consultation with the Lead Councillor for Finance and Assets, Customer Service and the Leader of the Council would determine the appropriation of the final balance in June 2020. Any ongoing variances between actual expenditure and budget identified in 2019-20 had been taken into account when preparing the budget for 2020-21.

Appendix 3 to the report provided a list of fees and charges for approval as part of the budget. The Executive had agreed the target increase given to service managers on 26 November 2019, subject to market constraints.

At its meeting held on 21 January 2020, the Executive had considered this report and had endorsed the recommendations therein and approved the transfer to reserves of the sums included in the proposed budget at Appendix 2 to the report and had approved the growth bids referred to in the report.

The Council's attention was drawn to the corrections to the report which were set out in the Order Paper

Under The Local Authorities (Standing Orders) (England) (Amendment) Regulations 2014 and Council Procedure Rule 19 (d), the Council was reminded that a recorded vote would be conducted on the proposed budget and Council tax resolution as set out in the report and the Order Paper circulated at the meeting which contained details of the respective precepts set by Surrey County Council and the Police and Crime Commissioner for Surrey.

The Lead Councillor for Finance and Assets, Customer Service, Councillor Joss Bigmore proposed and the Leader of the Council, Councillor Caroline Reeves, seconded the motion to approve the budget and council tax for 2020-21.

Following the debate, the Council

RESOLVED:

- (1) That the budget be approved, and specifically that the Council Tax requirement for 2020-21 be set at £10,192,858 excluding parish precepts and £11,933,858 to include parish precepts.
- (2) That the Band D Council Tax for 2020-21 (excluding parish precepts) be set at £176.82, an increase of £5.00 (3.00%).
- (3) That the Band D Council Tax for 2020-21 (including parish precepts) be set at £207.02.
- (4) That the Council approves the following, as considered by the Executive on 21 January 2020:

- (i) the General Fund revenue estimates for 2020-21 including proposed fees and charges relating to General Fund services, as set out in Appendix 3 to the report submitted to the Council;
  - (ii) the Housing Revenue Account estimates for 2020-21, including housing rents and other fees and charges;
  - (iii) the Capital and Investment Strategy for 2020-21; and
  - (iv) the Housing Revenue Account capital programme for 2020-21.
- (5) That the Council notes that the Chief Finance Officer, in accordance with the terms of her delegated authority, has calculated the following amounts for the year 2020-21 in accordance with regulations made under Sections 31B (3) and 34(4) of the Local Government Finance Act 1992 (as amended) ('the Act'):
- (i) 57,645.39 being the amount calculated by the Council, in accordance with Regulation 3 of the Local Authorities (Calculation of Council Tax Base) Regulations 1992, as its council tax base for 2020-21 for the whole Council area.

- (ii) For those parts of the borough to which a parish precept relates:

<b>Parish of</b>	<b>£</b>
Albury	614.54
Artington	140.17
Ash	6,723.59
East Clandon	145.68
West Clandon	697.97
Compton	485.11
Effingham	1,409.54
East Horsley	2,519.93
West Horsley	1,528.13
Normandy	1,353.88
Ockham	261.42
Pirbright	1,240.97
Puttenham	308.70
Ripley	916.15
St. Martha	404.74
Seale & Sands	514.76
Send	2,053.33
Shackleford	373.12
Shalford	1,865.10
Shere	1,993.25
Tongham	885.12
Wanborough	166.96
Wisley (Meeting)	0.00
Worplesdon	3,484.73

being the amounts calculated by the Council, in accordance with Regulation 6 of the 1992 Regulations, as the amounts of its council tax base for the year for dwellings in those parts of its area to which one or more special items relate.

(6) That the Council calculates the following amounts for the financial year 2020-21 in accordance with Sections 31 to 36 of the Act:

- (i) £170,957,474 being the aggregate of the amounts which the Council estimates for the items set out in Section 31A(2) of the Act taking into account all precepts issued to it by parish councils.
- (ii) £159,023,615 being the aggregate of the amounts which the Council estimates for the items set out in Section 31A(3) of the Act
- (iii) £11,933,858 being the amount by which the aggregate at sub-paragraph (i) above exceeds the aggregate at sub-paragraph (ii) above, calculated by the Council in accordance with Section 31A(4) of the Act, as its council tax requirements for the year.
- (iv) £207.02 being the amount at sub-paragraph (iii) above divided by the amount at sub-paragraph (i) of paragraph (5) above, calculated by the Council, in accordance with Section 31B (1) of the Act, as the basic amount of its Council Tax for the year (including parish precepts).
- (v) £1,876,544 being the aggregate amount of all special items (parish precepts) referred to in Section 34(1) of the Act as follows:

<b>Parish of</b>	<b>£</b>
Albury	45,070
Artington	4,052
Ash	487,080
East Clandon	8,234
West Clandon	23,472
Compton	27,176
Effingham	121,770
East Horsley	140,712
West Horsley	83,172
Normandy	139,999
Ockham	14,870
Pirbright	61,852
Puttenham	13,755
Ripley	67,099
St. Martha	15,030
Seale & Sands	19,000
Send	82,089
Shackleford	15,298
Shalford	96,063
Shere	129,852
Tongham	33,930
Wanborough	4,242

Wisley (Meeting)	0
Worplesdon	242,727
Total	1,876,544

- (vi) £176.82 being the amount at sub-paragraph (iv) above less the result given by dividing the amount at sub-paragraph (v) above by the amount at sub-paragraph (i) of paragraph (5) above, calculated by the Council in accordance with Section 34(2) of the Act, as the basic amount of its council tax for the year for dwellings in those parts of its area to which no special item (parish precept) relates.

- (vii) Part of the Council's area

<b>Parish of</b>	<b>£ p</b>
Albury	250.16
Artington	205.73
Ash	249.26
East Clandon	233.34
West Clandon	210.45
Compton	232.84
Effingham	263.21
East Horsley	232.66
West Horsley	231.25
Normandy	280.23
Ockham	233.70
Pirbright	226.66
Puttenham	221.38
Ripley	250.06
St. Martha	213.95
Seale & Sands	213.73
Send	216.80
Shackleford	217.82
Shalford	228.33
Shere	241.97
Tongham	215.15
Wanborough	202.23
Wisley (Meeting)	176.82
Worplesdon	246.47

being the amounts given by adding to the amount at sub-paragraph (vi) above the amounts of the special item or items relating to dwellings in those parts of the Council's area mentioned above divided in each case by the amount at sub-paragraph (ii) of paragraph (5) above, calculated by the Council in accordance with Section 34(3) of the Act, as the basic amounts of its council tax for the year for dwellings in those parts of its area to which one or more special items relate.



(viii) Part of the Council's area

VALUATION BANDS								
	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H
PARISH	£ p	£ p	£ p	£ p	£ p	£ p	£ p	£ p
Albury	166.77	194.57	222.36	250.16	305.75	361.34	416.93	500.32
Artington	137.15	160.01	182.87	205.73	251.45	297.17	342.88	411.46
Ash	166.17	193.87	221.56	249.26	304.65	360.04	415.43	498.52
East Clandon	155.56	181.49	207.41	233.34	285.19	337.05	388.90	466.68
West Clandon	140.30	163.68	187.07	210.45	257.22	303.98	350.75	420.90
Compton	155.23	181.10	206.97	232.84	284.58	336.32	388.07	465.68
Effingham	175.47	204.72	233.96	263.21	321.70	380.19	438.68	526.42
East Horsley	155.11	180.96	206.81	232.66	284.36	336.06	387.77	465.32
West Horsley	154.17	179.86	205.56	231.25	282.64	334.03	385.42	462.50
Normandy	186.82	217.96	249.09	280.23	342.50	404.78	467.05	560.46
Ockham	155.80	181.77	207.73	233.70	285.63	337.57	389.50	467.40
Pirbright	151.11	176.29	201.48	226.66	277.03	327.40	377.77	453.32
Puttenham	147.59	172.18	196.78	221.38	270.58	319.77	368.97	442.76
Ripley	166.71	194.49	222.28	250.06	305.63	361.20	416.77	500.12
St. Martha	142.63	166.41	190.18	213.95	261.49	309.04	356.58	427.90
Seale & Sands	142.49	166.23	189.98	213.73	261.23	308.72	356.22	427.46
Send	144.53	168.62	192.71	216.80	264.98	313.16	361.33	433.60
Shackleford	145.21	169.42	193.62	217.82	266.22	314.63	363.03	435.64
Shalford	152.22	177.59	202.96	228.33	279.07	329.81	380.55	456.66
Shere	161.31	188.20	215.08	241.97	295.74	349.51	403.28	483.94
Tongham	143.43	167.34	191.24	215.15	262.96	310.77	358.58	430.30
Wanborough	134.82	157.29	179.76	202.23	247.17	292.11	337.05	404.46
Wisley (Meeting)	117.88	137.53	157.17	176.82	216.11	255.41	294.70	353.64
Worplesdon	164.31	191.70	219.08	246.47	301.24	356.01	410.78	492.94
<b>TOWN AREA</b>								
Guildford	117.88	137.53	157.17	176.82	216.11	255.41	294.70	353.64

being the amounts given by multiplying the amounts at sub-paragraphs (vi) and (vii) above by the number which in the proportion set out in Section 5(1) of the Act, is applicable to dwellings listed in a particular valuation band divided by the number which in that proportion is applicable to dwellings listed in valuation band D, calculated by the Council in accordance with Section 36(1) of the Act, as the amounts to be taken into account for the year in respect of categories of dwellings listed in different valuation bands.

- (7) That the Council notes that for the year 2020-21, (i) Surrey County Council (SCC) have stated the following amounts in precepts issued to the Council, in accordance with Section 40 of the Act, for each of the categories of dwelling in the Council's area as shown below and that (ii) the Police and Crime Commissioner for Surrey (PCCS) draft figures below will be presented at the meeting of the Surrey Police and Crime Panel on 7 February 2020.

VALUATION BANDS								
	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H
	£ p	£ p	£ p	£ p	£ p	£ p	£ p	£ p
(i) SCC	1,007.64	1,175.58	1,343.52	1,511.46	1,847.34	2,183.22	2,519.10	3,022.92
(ii) PCCS	180.38	210.44	240.51	270.57	330.70	390.82	450.95	541.14

- (8) That the Council authorises the Chief Finance Officer to implement any variation to the overall level of Council Tax arising from the final notification of the Police and Crime Commissioner for Surrey precept.
- (9) That the Council agrees, having calculated the aggregate in each of the amounts at sub-paragraph (viii) of paragraph (6) and paragraph (7) above, to set the following amounts as the amounts of Council Tax for the year 2020-21 for each of the categories of dwellings shown below in accordance with Section 30(2) of the Act.

Part of the Council's Area:

VALUATION BANDS								
	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H
PARISH	£ p	£ p	£ p	£ p	£ p	£ p	£ p	£ p
Albury	1,356.81	1,582.95	1,809.08	2,035.22	2,487.49	2,939.76	3,392.03	4,070.44
Artington	1,327.19	1,548.39	1,769.59	1,990.79	2,433.19	2,875.59	3,317.98	3,981.58
Ash	1,356.21	1,582.25	1,808.28	2,034.32	2,486.39	2,938.46	3,390.53	4,068.64
East Clandon	1,345.60	1,569.87	1,794.13	2,018.40	2,466.93	2,915.47	3,364.00	4,036.80
West Clandon	1,330.34	1,552.06	1,773.79	1,995.51	2,438.96	2,882.40	3,325.85	3,991.02
Compton	1,345.27	1,569.48	1,793.69	2,017.90	2,466.32	2,914.74	3,363.17	4,035.80

	VALUATION BANDS							
	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H
Effingham	1,365.51	1,593.10	1,820.68	2,048.27	2,503.44	2,958.61	3,413.78	4,096.54
East Horsley	1,345.15	1,569.34	1,793.53	2,017.72	2,466.10	2,914.48	3,362.87	4,035.44
West Horsley	1,344.21	1,568.24	1,792.28	2,016.31	2,464.38	2,912.45	3,360.52	4,032.62
Normandy	1,376.86	1,606.34	1,835.81	2,065.29	2,524.24	2,983.20	3,442.15	4,130.58
Ockham	1,345.84	1,570.15	1,794.45	2,018.76	2,467.37	2,915.99	3,364.60	4,037.52
Pirbright	1,341.15	1,564.67	1,788.20	2,011.72	2,458.77	2,905.82	3,352.87	4,023.44
Puttenham	1,337.63	1,560.56	1,783.50	2,006.44	2,452.32	2,898.19	3,344.07	4,012.88
Ripley	1,356.75	1,582.87	1,809.00	2,035.12	2,487.37	2,939.62	3,391.87	4,070.24
St. Martha	1,332.67	1,554.79	1,776.90	1,999.01	2,443.23	2,887.46	3,331.68	3,998.02
Seale & Sands	1,332.53	1,554.61	1,776.70	1,998.79	2,442.97	2,887.14	3,331.32	3,997.58
Send	1,334.57	1,557.00	1,779.43	2,001.86	2,446.72	2,891.58	3,336.43	4,003.72
Shackleford	1,335.25	1,557.80	1,780.34	2,002.88	2,447.96	2,893.05	3,338.13	4,005.76
Shalford	1,342.26	1,565.97	1,789.68	2,013.39	2,460.81	2,908.23	3,355.65	4,026.78
Shere	1,351.35	1,576.58	1,801.80	2,027.03	2,477.48	2,927.93	3,378.38	4,054.06
Tongham	1,333.47	1,555.72	1,777.96	2,000.21	2,444.70	2,889.19	3,333.68	4,000.42
Wanborough	1,324.86	1,545.67	1,766.48	1,987.29	2,428.91	2,870.53	3,312.15	3,974.58
Wisley (Meeting*)	1,307.92	1,525.91	1,743.89	1,961.88	2,397.85	2,833.83	3,269.80	3,923.76
Worplesdon	1,354.35	1,580.08	1,805.80	2,031.53	2,482.98	2,934.43	3,385.88	4,063.06
<b>TOWN AREA</b>								
Guildford	1,307.92	1,525.91	1,743.89	1,961.88	2,397.85	2,833.83	3,269.80	3,923.76

**\*Note: Wisley Parish Meeting**

In accordance with the Executive's decision at its meeting on 8 August 2002 (see Minute No. 270 – 2002-03), the Chief Finance Officer has anticipated the precept for 2019-20 for the Wisley Parish Meeting to be £nil and this is reflected in all the relevant Council Tax figures above.

- (10) That the Council determines that the Borough Council's basic amount of council tax for 2020-21 is not excessive in accordance with the principles approved under section 52ZB of the Act.
- (11) That, as the billing authority, the Council notes that it has not been notified by a major precepting authority that its relevant basic amount of Council Tax for 2020-21 was excessive under the regulations and that the billing authority was not required to hold a referendum in accordance with Section 52ZK of the Act.
- (12) That the Council agrees, in respect of council tax payments:

- (i) that the payment dates for the statutory ten monthly instalment scheme be set to run from 2 April to 2 January each year; and
  - (ii) that the payment dates be set as the second day of each month for a customer who has requested to opt out of the statutory scheme under the provisions of The Council Tax (Administration and Enforcement) (Amendment) (No 2) (England) Regulations 2012.
- (13) That the Council agrees, in respect of non-domestic rate payments:
- (i) that the payment dates for the statutory ten monthly instalment scheme be set to run from 2 April to 2 January each year; and
  - (ii) that the payment dates be set as the second day of each month for a customer who has requested to opt out of the statutory scheme under the provisions of the Non Domestic Rating (Collection and Enforcement) (Amendment) (England) Regulations 2014.
- (14) That the Council approves the annual statement of accounts for Wisley Parish Meeting, which is currently dormant, for the year ended 31 March 2019, as set out below:

	Year ending	
	31 March 2018 £	31 March 2019 £
1. Balances brought forward	3,508	3,525
2. (+) Annual precept	Nil	Nil
3. (+) Total other receipts	17	26
4. (-) Staff costs	Nil	Nil
5. (-) Loan interest/capital repayments	Nil	Nil
6. (-) Total other payments	Nil	Nil
7. (=) Balances carried forward	3,525	3,551
8. Total cash and investments	3,525	3,551
9. Total fixed assets and long-term assets	Nil	Nil
10. Total borrowings	Nil	Nil

**Reason for Decision:**

To enable the Council to set the Council Tax requirement and council tax for the 2020-21 financial year.

**Result of the Recorded Vote:**

The motion to adopt the Budget and Council Tax resolution above was approved, with thirty-nine councillors voting in favour, none voting against and two abstentions, as follows:

**FOR:**

Councillor Paul Abbey  
 Councillor Tim Anderson  
 Councillor Jon Askew  
 Councillor Joss Bigmore  
 Councillor David Bilbe  
 Councillor Chris Blow  
 Councillor Dennis Booth  
 Councillor Ruth Brothwell

**AGAINST:**

**ABSTAIN:**

Councillor Richard Billington  
 Councillor Marsha Moseley

**FOR:**

Councillor Colin Cross  
Councillor Andrew Gomm  
Councillor Angela Goodwin  
Councillor David Goodwin  
Councillor Angela Gunning  
Councillor Gillian Harwood  
Councillor Liz Hogger  
Councillor Tom Hunt  
Councillor Gordon Jackson  
Councillor Diana Jones  
Councillor Steven Lee  
Councillor Nigel Manning  
Councillor Julia McShane  
Councillor Ann McShee  
Councillor Bob McShee  
Councillor Masuk Miah  
Councillor Ramsey Nagaty  
Councillor Susan Parker  
Councillor George Potter  
Councillor John Redpath  
Councillor Maddy Redpath  
Councillor Caroline Reeves  
Councillor John Rigg  
Councillor Tony Rooth  
Councillor Pauline Searle  
Councillor Patrick Sheard  
Councillor Paul Spooner  
Councillor James Steel  
Councillor James Walsh  
Councillor Fiona White  
Councillor Catherine Young

**AGAINST:**

**ABSTAIN:**

**CO116 SELECTION OF DEPUTY MAYOR: 2020-21**

Councillors were reminded that, at its meeting on 3 December 2019, the Council had formally nominated the Deputy Mayor, Councillor Marsha Moseley for the Mayoralty for the municipal year 2020-21.

As no nominations in respect of the appointment of the Deputy Mayor for the municipal year 2020-21 had been received, the Council had deferred consideration of the matter to this meeting.

The Council noted that, since the December meeting, Councillor Dennis Booth had been nominated for consideration in respect of the appointment. Councillor Booth left the meeting during the Council's consideration of this matter.

Upon the motion of the Lead Councillor for Finance and Assets, Customer Service, Councillor Joss Bigmore seconded by the Deputy Mayor, Councillor Marsha Moseley, the Council

**RESOLVED:** That Councillor Dennis Booth be nominated for the Deputy Mayoralty of the Borough for the 2020-21 municipal year.

Reason:

To make early preparations for the selection of the Deputy Mayor for the 2020-21 municipal year.

**CO117 MINUTES OF THE EXECUTIVE**

The Council received and noted the minutes of the meetings of the Executive held on 22 October and 26 November 2019.

**CO118 COMMON SEAL**

The Council

RESOLVED: That the Common Seal of the Council be affixed to any documents to give effect to any decisions taken by the Council at this meeting.

The meeting finished at 9.20 pm

Signed .....  
Mayor

Date .....

Council Report

Wards affected: All

Report of Chief Finance Officer

Author: Claire Morris

Tel: 01483 444827

Email: [claire.morris@guildford.gov.uk](mailto:claire.morris@guildford.gov.uk)

Lead Councillor responsible: Joss Bigmore

Tel: 07974 979369

Email: [joss.bigmore@guildford.gov.uk](mailto:joss.bigmore@guildford.gov.uk)

Date: 5 May 2020

## COVID19: Emergency Budget

### Executive Summary

Guildford Borough Council is a category 1 responder to civil emergencies under the Civil Contingencies Act 2004. This means that the Council has a vitally important role in responding locally to COVID19, to save lives, protect the NHS, and ensure our residents are protected wherever possible. We also have a duty to ensure that crucial council services continue to operate in these unprecedented times. The situation is changing rapidly. The purpose of this report is to set out the Council's response so far to COVID-19, the impact on our services and seeks approval of an emergency budget to support the Council's response. The Council's response to the pandemic has been intense and wide ranging across a number of critical services as set out in section 4 of the report. It is worth mentioning that these are extraordinary times, COVID19 is a world- wide pandemic which has resulted in severe measures to contain the virus both in the UK and nearly 200 other countries . ***It is unprecedented to stand up our National Emergency Plans, Surrey Major Incident emergency response and business continuity plans simultaneously on a protracted scale.***

Section 5 of the report sets out that Officers predict a range of financial implications for the Council depending on how long the government restrictions are in place. The financial implications could be between £5million and £15million (11% to 31% of the Council's Net budget requirement). Whilst further government grant support is anticipated, the amount and timing of that support is currently uncertain. As a result, officers recommend that the Council puts in place an emergency budget of up to £15million funded from reserves to cover both the costs being incurred and the potential loss of income from the COVID19 Pandemic.

Section 9 sets out the Council's response to redeploying staff from non-critical services into critical services to ensure that we can continue to meet the challenge. This has and will mean that in some non-critical services, ordinary council work is being put on hold or suspended for a period of time. The Council is extremely proud of how our staff have responded to this challenging and worrying situation. Many of these public servants are working on the front line delivering critical services and have demonstrated a real commitment in continuing with their work, whilst many others have joined them to provide

additional resource where it is most needed.

The Executive considered this report at its meeting on 21 April 2020 and endorsed unanimously the recommendation to Council set out below.

### **Recommendation to Council**

That the Council:

- (1) Notes the Council's duties and response so far in dealing with the COVID19 pandemic
- (2) Notes the initial assessment of the impact on Guildford Borough Council's short-term financial position
- (3) Approves a revenue supplementary estimate of £15million to be funded from general fund reserves, such funding to be drawn down only if further government support is not forthcoming or is insufficient to cover the financial impact of COVID19 on the Council and sufficient cost savings cannot be found
- (4) Notes the advice of the Chief Finance Officer in paragraph 5.18 regarding the level of reserves and the potential need to rebuild reserves to a sufficient level if government grant support falls short
- (5) Notes the changes to Local Authority powers and duties introduced by the Coronavirus Act 2020 and delegates to the Managing Director, in consultation with the Leader of the Council, authority to amend service provision in accordance with the Council's statutory duties as these may be varied by the Act, regulations and guidance made thereunder.

#### Reason for Recommendation:

To enable the Council to continue to respond to the COVID19 emergency.

**Is the report (or part of it) exempt from publication? No**

## **1. Purpose of report**

- 1.1 The purpose of this report is to set out the Council's duties as a Category 1 responder under the Civil Contingencies Act 2004 in responding to the COVID19 Pandemic Emergency and provide an update on the response so far.
- 1.2 Council Constitution Part 3 Delegation to Officers, Managing Director, paragraph 2 states that the Managing Director can, in consultation with the Leader where practicable and the Monitoring Officer, act in an emergency or in relation to matters of urgency in relation to any functions of the Council, subject to the use of this power being reported to the next meeting of the Council, Executive or committee concerned.
- 1.3 Many of the actions the Council has taken so far have involved incurring emergency expenditure that was not included in the Council's 2020-21 Budget approved by Council on 5 February 2020. This report therefore seeks approval of a supplementary estimate for the general fund revenue account and the housing revenue account to deal with the financial impact of the COVID19 Pandemic Emergency.



## **2. Strategic Priorities**

- 2.1 The budget underpins the Council's strategic framework and delivery of the Corporate Plan.

## **3. Background**

- 3.1 Councils, like Guildford Borough Council, are category one responders under the Civil Contingencies Act 2004, which sets out the legislative framework for responding to emergencies such as the COVID-19 outbreak. As part of the local resilience forum (LRF), councils work with local partner organisations to plan and activate their emergency responses, and there are established officer-led processes for leading the strategic (gold), tactical (silver) and operational (bronze) responses to emergencies under the 2004 Act. LRFs are based on police areas and so Guildford, along with all the other District and Borough Councils, Surrey County Council, Surrey Police, Surrey Fire and Rescue Service and local NHS bodies are all category 1 members of the Surrey Local Resilience Forum (SLRF). Category 2 responders, such as utility and infrastructure companies are also part of the SLRF. Surrey County Council leads the SLRF.
- 3.2 A Major incident was declared in Surrey on Thursday 19 March due to the Covid-19 pandemic affecting Surrey. The Surrey Strategic Coordinating Group (gold) was established at Mount Browne on 20 March, with meetings happening in person and virtually. The SCG is working with all partners and agencies across Surrey to provide a co-ordinated response, with the main aims to:
- support colleagues in health to ensure that we reduce pressure on the health system;
  - delay the spread of the virus and save lives;
  - support communities and protect our most vulnerable residents.
- 3.3 A number of SCG tactical subgroups (silver) were set up from Friday 20 March onwards to co-ordinate activity across the system to address the impact of COVID19 on individuals, communities and services. Various Guildford Borough Council Officers are playing an active role in all sub-groups.
- 3.4 At Guildford Borough Council, our initial COVID19 working group had been operating twice weekly since the beginning of March when the first COVID19 cases were announced in Surrey. Initial work focussed on the review and update of our Business Continuity Plans, risk assessments and other preparation work to ensure the continuity of Council services.
- 3.5 The initial working group was expanded to form the Guildford Operational COVID19 response group (bronze) when the major incident was declared. The Guildford COVID19 response group meets daily and consist of 19 officers (the Managing Director, Directors, 6 Senior Leaders, and other specific officers), the Leader and Deputy Leader of the Council and representatives from Applied Resilience, the Council's Emergency Planning Consultants. The role of the group is to ensure the continued operation of the Council's critical services and ensure the operational implementation of instructions received from Government or Surrey SCG in responding to the emergency.

- 3.6 It is worth mentioning that these are extraordinary times, COVID19 is a world- wide pandemic which has resulted in severe measures to contain the virus both in the UK and nearly 200 other countries . ***It is unprecedented to stand up our National Emergency Plans, Surrey Major Incident emergency response and business continuity plans simultaneously on a protracted scale.***

#### 4. Council response so far

- 4.1 As stated above, Guildford Borough Council has activated both its Borough Emergency Plan (as part of the declaration of a Major Incident in Surrey) and its business continuity plan to ensure we can continue to deliver critical front-line services. Our critical front-line services are:
- Housing & Homelessness Services,
  - Waste, Refuse & Recycling,
  - Street Cleaning,
  - On-street parking management for Highways
  - CCTV
  - Bereavement Services,
  - Emergency Licensing, Food Safety and Pest Control,
  - Business Rates, Council Tax and Benefits,
  - Emergency planning and response,
  - Customers services and communications.
- In addition, support services such as HR, Finance and ICT are also required to enable the provision of critical front-line services.
- 4.2 From an emergency plan perspective our key priorities are to support our NHS colleagues and supporting vulnerable individuals and communities in Surrey, with a particular focus on those in Guildford. Specific immediate steps have been taken to support the most vulnerable individuals and communities and to respond to the pandemic emergency. This has included:
- Establishing a Surrey wide Community Hub at Spectrum leisure centre to coordinate measures to support the approx. 15,000 most vulnerable people in Surrey and 'shield' them from COVID-19,
  - Establishing 'Locality Hubs' at Park Barn and Shawfield Day Centres to support our day centre, meals on wheels, sheltered and supported housing clients, and other people self-referred to us as needing help, with food parcels, meals on wheels and welfare calls
  - Procuring and placing homeless households and rough sleepers in hotel accommodation and providing meals and food parcels to them
  - Procuring and placing people discharged from hospital in suitable accommodation and ensuring they have support and food
  - Procuring and placing people discharged from the probation service and prison in suitable accommodation and ensuring they have support and food
  - Playing our part in the Surrey wide 'surge planning' to put plans in place for a potential significant escalation of COVID19 cases requiring hospital care
  - Scaling operations at the Crematorium to deal with Excess Deaths
  - Providing business rate relief and grants prescribed by the government to affected businesses
  - Providing hardship funding for Council tax and administering an increase in claimants for the local council tax support scheme

- Providing general advice to the public and specific advice to individuals suffering hardship as a result of COVID19
- Playing our part in recovery planning

4.3 From a Business Continuity perspective, the Council, like many other organisations, has had to rapidly enable officers and Councillors to work from home on a large scale. A significant proportion of the Council's officers are classed as Key Workers and so are expected to attend their normal places of work and carry out their roles if it is not possible to carry out their jobs from home. However, in order to ensure the safety and health of our staff, we have taken as many precautionary steps as possible to reduce the risk to their health of carrying out their roles. This has included closing our offices and enabling officers to work from home en-masse where possible. We have also taken steps to ensure that where staff have to attend a place of work or are providing frontline services to the public, that we are able to implement, as far as possible, social distancing and provide appropriate personal protective equipment where risk assessments have identified a need to do so.

4.4 The Council was in a very good position to do this, having just completed its ICT refresh project. As part of the project we had started the migration of services to cloud technology and rolled out laptops to over 700 staff to enable them to work in an agile way. However, allowing working from home en-masse required the following:

- Additional licences for the Council's Virtual Private Network (VPN)
- Additional licences to MS Teams to allow guest and dial-in access
- Additional soft phone licences from Mitel to enable officers who need to, to take calls from members of the public at home on their office phone numbers. This included the roll out of soft phone technology to our customer service centre, housing, business rate, council tax and benefits teams all of whom have played a significant part in responding to the emergency.
- Additional works to enable virtual committee and live streaming of meetings

## **5. Financial implications**

5.1 Section 4 outlines the significant work that the Council is doing in responding to the COVID19 pandemic emergency. Many of the actions taken to date, and which need to be undertaken in the next few months, were not included in the Council's budget for 2020-21 when it was approved on 5 February 2020.

5.2 It is currently uncertain as to how long the current restrictions or 'lockdown' is likely to last. We have modelled a number of scenarios, based on various different government announcements, as follows:-

- best case scenario – current restrictions will last for 1 month
- mid-case scenario - restrictions will last for 3 months
- worst case scenario - restrictions will be in place for up to 6 months.

5.3 An estimate of likely costs to be incurred under each scenario are as follows:

## Agenda item number: 8

Covid19 Additional Expenditure			
Service	Best	Mid	Worst
Revenues and Benefits - Software costs for COVID19 grants and reliefs	9,150.00	9,150.00	9,150.00
ICT - Softphones to enable call centre staff to work from home	1,889.00	1,889.00	1,889.00
ICT - Microsoft Teams Licences x 40	1,480.00	1,480.00	1,480.00
Crematorium - additional coffin storage capacity	6,000.00	6,000.00	6,000.00
Project Aspire - food parcels and grants	50,000.00	50,000.00	50,000.00
Spectrum Leisure Centre: operator support costs & use as food distribution hub	264,220.00	792,660.00	1,585,320.00
Homelessness - additional accommodation	71,972.50	224,160.00	448,320.00
Glive Theatre - business continuity costs	18,109.00	54,327.00	108,654.00
Recovery action	500,000.00	500,000.00	500,000.00
Corporate Finance - short term borrowing for cash flow purposes	9,342.47	28,027.41	56,054.82
	932,162.97	1,667,693.41	2,766,867.82

5.4 In addition to the costs being incurred, like many other organisations, the Council is witnessing a significant reduction, and in some cases, total loss, of some of its service income streams. The main areas are listed below:

- On 27 March 2020, the UK government announced that councils were required to make parking free to key workers. However, car park usage and income had fallen so significantly following the 'lockdown' announced on 24 March that the Council, in line with many others across the UK, suspended all parking charges until further notice. As a result, a total loss of income for a period of time has been predicted.
- Commercial rental income – in line with government guidance to landlords the Council has deferred rental payments to some tenants; however it is anticipated that even with the deferment and various government support to business that some businesses will still fall into liquidation. Estimates have therefore been made for the level of potential default of rent payment across our investment property portfolio due to increased tenant bankruptcy.
- Tourism, Sport & Leisure income – this income stream has suffered a total loss since the government announced the closure of all sites for the foreseeable future.
- Trade refuse – due to significant business closures and other businesses asking staff to work from home, this income stream is also experiencing significant reductions.

A risk analysis of the potential income reduction against 2020-21 budgeted levels is shown in the table below based on the scenarios outlined in paragraph 5.2, along with a total combined cost and loss of income.

<b>Covid19 Potential Loss of Income</b>			
<b>Service</b>	<b>Best</b>	<b>Mid</b>	<b>Worst</b>
Car Parking Income	£ 2,965,137	£ 4,797,753	£ 7,750,844
Commercial Rent defaults	£ 179,134	£ 341,108	£ 892,558
Tourism	£ 126,996	£ 291,104	£ 372,382
Sports and Leisure	£ 41,454	£ 311,078	£ 649,060
Other (eg, planning, trade refuse etc)	£ 647,590	£ 996,292	£ 1,992,583
HRA Rent Arrears / defaults	£ 17,336	£ 52,008	£ 86,681
Future Guildford Transformation Project benefits realisation delay	£ 230,938	£ 317,198	£ 437,769
	<b>£ 4,208,585</b>	<b>£ 7,106,541</b>	<b>£ 12,181,877</b>
<b>Total combined costs and loss of income (excl HRA)</b>	<b>£ 5,123,412</b>	<b>£ 8,722,225</b>	<b>£ 14,862,065</b>
% Core spending Power	37%	62%	106%
% Net Budget requirement	11%	18%	31%

- 5.5 It is, sadly, inevitable that there will be additional income from Cremation fees and memorabilia that may offset some of the above income loss however, what that may be is difficult to predict at present. Obviously, we hope this amount is not significant.
- 5.6 The potential combined loss of income and additional costs being incurred are material to the Council's budget and financial position. The Council's Net Budget requirement for 2020-21 is £48.7 million. As a percentage of the net budget requirement the potential combined loss of income and additional costs could be between 11% and 31%. The Government expresses local authority spending in a term known as 'core spending power' which represents the government's settlement funding assessment, council tax income and new homes bonus income. The Council's core spending power for 2020-21 is £14million therefore the impact of the COVID19 pandemic ranges from 37% to 106% core spending power.
- 5.7 The costs above include a budget of £0.5million for potential costs of recovery operations. This is a high level estimate, as at present it is too early to know what activities and costs may be involved. A further report may be needed on this at a later date.

### **Council Tax, Local Council Tax Support and Business Rates**

- 5.8 In addition to the direct impact on the Council's General Fund and HRA budget, the Council is likely to see a reduction in Council Tax income over time due to a potential significant increase in people requiring support from the Local Council Tax Support Scheme (LCTSS). Individuals who have lost their job or seen a significant reduction in their salary may be eligible to receive LCTS. It is likely that most people will qualify if they qualify for Universal Credit. It is not possible to estimate the full impact of this at the moment as it is early days; however, over the last week or two we have seen a five-fold increase in the number of weekly applications for LCTS compared to normal and expect that trend to continue. The loss of council tax income will initially hit the Council's collection fund in 2020-21 rather than the general fund, however, if the loss of income results in a significant deficit on the collection fund then the Council's share of the deficit will need to be charged to the general fund in 2021-22.

- 5.9 The government has announced a hardship fund for those households that are struggling financially as a result of COVID19. Those households that are already on LCTS but still pay a contribution towards their Council Tax will be provided with an additional £150 of support. This will be applied automatically to individual accounts so that the adjusted amounts were included in the April direct debit instalments. Revised bills will be sent to individual households in due course reflecting the lower amounts due. In addition, funding has also been provided to make short term discretionary payments to those that are affected by the Local Council Tax Support Scheme and are struggling financially. This funding is being distributed on a case by case basis as people contact us with their difficulties.
- 5.10 The government has also announced a range of support through business rates relief and grants to small medium enterprises and those businesses in the retail, hospitality and leisure industry. Grants of £10,000 are available to small businesses who have a rateable value under £15,000 and grants of £25,000 are available for those businesses whose rateable value is between £15,001 and £51,000 who qualified for small business rate relief or rural business rate relief. This scheme was also extended to cover businesses in the retail, hospitality and leisure industry. Initial indications are that 1,869 businesses will qualify for the relevant grants which may total around £24million. We have received £21 million as an advanced payment from the Government for distributing under the scheme.
- 5.11 The government has now provided the Council with the guidance necessary to deliver the grants to businesses and we expect to start identifying the businesses that qualify and make payments from 6 April. We aim to have paid all grants by the end of April at the latest.
- 5.12 In addition to the grants, businesses in the retail, hospitality and leisure have been awarded 100% relief from business rates for 12 months by the government. We have identified around 930 businesses who qualify for this 100% relief totalling £41.5million. The collectible rates for Guildford Borough for 2020-21 was £86.773million (as reported on our NNDR1 form), therefore the reliefs awarded as a result of COVID19 pandemic represent 48% of our business rates. We have already applied the relief to the business rate accounts so that their business rate bills were reduced ahead of the normal 2 April direct debit run. As a result, the businesses have already started to benefit from this relief.
- 5.13 It is possible that even with the support available to both business and individuals that the Council will see a reduction in overall collection rates for both council tax and business rates due to a potential increase in bankruptcy. The loss of income will initially hit the Council's collection fund in 2020-21 rather than the general fund, however, if the loss of income results in a significant deficit on the collection fund then the Council's share of the deficit will need to be charged to the general fund in 2021-22.
- 5.14 The administration of the various grants and reliefs provided by government for businesses and individuals has caused a significant increase in workload for the teams involved who are working hard to ensure that the financial support is paid to those who need it as quickly as possible.

## **Government grants**

- 5.15 Government has stated that it intends to fully compensate councils for the impact of COVID19. It is currently unclear whether this promise is just in relation to costs incurred or whether it would cover loss of income also. To help with the costs and loss of income the government has so far awarded the Council a £12,000 rough sleepers grant, and a general non-ringfenced grant of £51,000 to cover the impact of the pandemic across all services. As set out in section 5, the costs and loss of income are significantly in excess of the grant awarded so far.
- 5.16 Government has also stated that the funding was an initial tranche of funding and that further funding would be forthcoming. In that respect it has asked for feedback from local authorities via Chief Finance Officer networks as to what the impact on local authorities is and the potential scale of the impact. The Director of Resources has provided this information, which as far as possible is set out in section 5 of this report, to the Society of District Council Treasurers for discussion with the Ministry of Housing, Communities and Local Government (MHCLG). Following the initial request, MHCLG have sent all authorities a data collection template to complete monthly to capture the costs and potential loss of income. Officers will complete and return the data as requested.
- 5.17 The Council has already received the following funding from government:
- (a) £469,000 for the payment of the council tax hardship fund (paragraph 5.7)
  - (b) £21million upfront payment for the business rates grants (paragraph 5.10)
  - (c) An initial £1.2million Section 31 grant for the business rate reliefs
- 5.18 The Council is required to complete a weekly reconciliation for MHCLG on the grants received and those business rate and council tax reliefs and grants paid out to individuals and businesses. From this it is anticipated that further payments on account will be received.

## **Reserves**

- 5.19 When the 2020-21 Budget was reported to Council on 5 February 2020 officers anticipated the level of available general fund reserves to be around £35million. Of this £3.75million is in the unallocated general fund reserve and the remaining £31million is in earmarked reserves. The Council has budgeted to use £13million of earmarked reserves to pump prime its Future Guildford transformation programme leaving a balance of £18million in earmarked reserves and £3.75million in the unallocated reserve.
- 5.20 Although the government has promised further support above the grants that have already been made available, the amount and timing of that support is currently uncertain. It is therefore recommended that the Council allocates an emergency budget of up to £15million funded from earmarked reserves to fund the worst-case scenario potential impact of COVID19 pandemic. The reserves will only be drawn down if the loss of income and expenditure incurred is not offset by further government grant support. In this scenario, Officers will also look for cost savings to partially offset the impact on reserves however, it should be noted that depending on the scale of the shortfall in government funding, it

might be unlikely that sufficient cost savings can be found in year to bring the council's expenditure back in line with its budget.

- 5.21 There is a risk that if further grant funding from government is either not forthcoming or is insufficient to cover the financial impact of the COVID19 pandemic on the Council that the emergency budget will reduce the Council's reserves to a level that the Chief Finance Officer would advise to be insufficient for the operating risks that the Council faces under normal business as usual circumstances. The financial risk register presented to Budget Council on 5 February showed that reserves of around £10million are considered sufficient and sustainable for the Council. If reserves fall to insufficient levels, then the Council will be advised to budget to rebuild the reserves to a sufficient level over its medium term financial plan. It is quite unlikely that sufficient cost savings will be able to be found in any one year, and so it will take a number of years to rebuild reserves.

## **6. Consultations**

- 6.1 Due to the emergency nature of the COVID19 Pandemic it has not been possible to consult the Executive Advisory Boards about this report. The Leader and Deputy Leader of the Council, Cllrs Caroline Reeves and Jan Harwood, are active members of the Council's COVID19 response group and have been consulted about the situation and the Council's response. The Lead Councillor for Finance, Assets and Customer Service, Cllr Joss Bigmore has also been consulted about the financial implications of the emergency situation and the supplementary estimate requested in this report.
- 6.2 The Managing Director has also briefed political group leaders on the emergency situation and the Council's response on a weekly basis.

## **7. Equality and diversity implications**

- 7.1 The outbreak of COVID19 creates a particular issue for some of our most vulnerable residents, particularly those over the age of 70 and with underlying health conditions. The response effort to provide welfare calls, support and food parcels to this group of people is important to ensure that vulnerable residents are not significantly adversely affected and to ensure we are carrying out our duties under the equalities act.

## **8. Legal implications**

- 8.1 The Council is a Category 1 responder under the Civil Contingencies Act 2004 and it is deemed that the current Covid 19 pandemic is an 'emergency' under the meaning of the Act.
- 8.2 Part 3 paragraph 2 of the Council's Constitution permits the Managing Director, in consultation with the Leader where practicable and the Monitoring Officer, to act in an emergency or in relation to matters of urgency in relation to any functions of the Council, subject to the use of this power being reported to the next meeting of the Council, Executive or committee concerned.



- 8.3 The Coronavirus Act 2020 came into force on 25 March 2020. The Act prevents the eviction of residential tenancies and the forfeiture of commercial leases by reason of non-payment of rent during this emergency period.
- 8.4 The State Aid rules continue to apply currently and legal advice will continue to be provided in relation to any 'aid' being provided to businesses throughout this emergency.
- 8.5 The Chief Finance Officer is required by the Local Government Act 1972 section 151 to ensure that the Council's budgeting meets relevant statutory and professional requirements.
- 8.6 The Local Government Act 2003 section 25 provides that the Council's Chief Finance Officer is required to report to the Council on the adequacy of the proposed financial reserves.

## **9. Human Resources implications**

- 9.1 For those staff that are unable to attend work either through illness, or the need to self-isolate due to members of their household having Covid-19 symptoms, or if they are part of the Shielded Group, we have provided an absence policy that provides them with normal pay during this period. For those staff that have dependent responsibilities we have introduced up to 10 days of paid leave. For other staff who wish to self-isolate and are not able to continue to work we have worked with them to offer a mixture of paid and unpaid leave to accommodate their needs.
- 9.2 All services are required to make contingency plans to maintain essential services during the pandemic and identify those which will be closed. A core element of the contingency planning process is to identify areas of potential staff shortages to which staff can be redeployed. Staff will be asked to use their skills and experience to support the continued delivery of essential public services and this may involve covering a different role and supporting the work of other public services providers. Some staff have already redeployed and many more will be asked to do so in the coming weeks as we increase our response to the pandemic. In addition, a number of staff working in critical services have had to cancel leave and will be required to work overtime to ensure that services can continue to operate over the weekends.
- 9.3 The Council is extremely proud of how our staff have responded to this challenging and worrying situation. Many of these public servants are working on the front line delivering critical services and have demonstrated a real commitment in continuing with their work, whilst many others have joined them to provide additional resource where it is most needed.

## **10. Conclusion**

- 10.1 Guildford Borough Council is a category 1 responder to civil emergencies under the Civil Contingencies Act 2004. This means that the Council has a vitally important role in responding locally to COVID19, to save lives, protect the NHS, and ensure our residents are protected wherever possible. We also have a duty

to ensure that crucial council services continue to operate in these unprecedented times.

- 10.2 The Council's response to the pandemic has been intense and wide ranging across a number of critical services. The report sets out that Officers predict a range of financial implications for the Council depending on how long the government restrictions are in place. The financial implications could be between £5million and £15million (11% to 31% of the Council's Net budget requirement). Whilst further government grant support is anticipated, the amount and timing of that support is currently uncertain. As a result, officers recommend that the Council puts in place an emergency budget of up to £15million funded from reserves to cover both the costs being incurred and the potential loss of income from the COVID19 Pandemic.
- 10.3 The Council has redeployed staff from non-critical services into critical services to ensure that we can continue to meet the challenge. This has and will mean that in some non-critical services, ordinary council work is being put on hold or suspended for a period of time. The Council is extremely proud of how our staff have responded to this challenging and worrying situation. Many of these public servants are working on the front line delivering critical services and have demonstrated a real commitment in continuing with their work, whilst many others have joined them to provide additional resource where it is most needed.

**11. Background Papers**

None

**12. Appendices**

None

Council Report

Ward(s) affected: All

Report of Director of Strategic Services

Author: Stuart Harrison, Planning Policy Manager

Tel: 01483 444512

Email: stuart.harrison@guildford.gov.uk

Lead Councillor responsible: Jan Harwood

Tel: 07507 505363

Email: jan.harwood@guildford.gov.uk

Date: 5 May 2020

## **Regulation 18 consultation on Local Plan: Development Management Policies**

### **Executive Summary**

The Local Plan: Development Management Policies (hereafter referred to as ‘the draft Local Plan’) is the second part of Guildford’s Local Plan. Once adopted it will, together with the recently adopted Local Plan: Strategy and Sites document (LPSS), fully supersede the existing Local Plan 2003 as the Council’s Development Plan. The draft Local Plan provides the more detailed policies to be used by Development Management in the determination of planning applications. It should be noted that the LPSS includes a small number of development management policies where these were necessary in implementing the strategic policies, for examples in relation to Green Belt, employment and retail.

The structure of the draft Local Plan is consistent with that contained in the LPSS. The chapters therefore consist of: Housing, Protecting, Economy, Design, and Infrastructure and Delivery. A list of all the proposed policies and a brief summary as to their aims and how they seek to achieve those aims is contained in Appendix 1.

The Regulation 18 consultation includes both ‘issues, options’ and goes on to suggest a ‘preferred option’ for each policy. This approach is designed to generate meaningful comments and concerns that will enable the Council to move straight to a Regulation 19 ‘proposed submission’ document. This in turn will increase the possibility of being able to progress the plan to Examination without the need for main modifications and a further round of consultation. The consultation period will run for seven weeks to commence as soon as is practicable in May 2020 following the Council’s consideration of the matter.

This matter was considered by the Leader of the Council, on behalf of the Executive, on 24 March 2020. The Leader endorsed the recommendation below.

### **Recommendation to Council**

- (1) That the draft Local Plan: Development Management Policies document, be approved for Regulation 18 public consultation for a seven-week period of consultation beginning as soon as is practicable in May 2020.
- (2) That the Planning Policy Manager be authorised to make such minor alterations to improve the clarity of the document as he may determine in consultation with the Lead Councillor.

#### Reasons for Recommendation:

Undertaking a public consultation on the draft Local Plan is a statutory requirement placed on Local Planning Authorities under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ('Local Planning Regulations') and will enable the Council to move closer to adopting the second part of the Local Plan.

**Is the report (or part of it) exempt from publication? No**

## **1. Purpose of Report**

- 1.1 The draft Local Plan must undergo a number of statutory processes, including at least two public consultations, in order to progress towards an examination in public and eventual adoption. This report seeks authority to publish the draft Local Plan document (see **Appendix 2**) for the first statutory consultation (Regulation 18) for a period of seven weeks (commencing as soon as is practicable in May 2020) and to allow for any minor amendments or typographical changes to be made following this meeting.

## **2. Strategic Priorities**

- 2.1 The production of the Local Plan is a statutory requirement and will help the Council meet its strategic priorities. Once adopted, the Local Plan, consisting of the Local Plan: Strategy and Sites and the Local Plan: Development Management Policies, will enable the Council to mitigate and adapt to Climate Change as well as provide for the needs of the community whilst enhancing the economy, and protecting the borough's special built and natural environment.
- 2.2 The draft Local Plan is based upon thirteen strategic objectives, which are framed within one of the following four core themes: society, environment, economy and infrastructure. These strategic objectives are the same as those that underpinned the LPSS and build upon the fundamental themes identified in the Council's Strategic Framework.

## **3. Background**

- 3.1 Planning decisions must be taken in line with the 'development plan' unless material considerations indicate otherwise. The development plan for an area is made up of the combination of strategic policies (which address the priorities for an area) and non-strategic policies (which deal with more detailed matters). The extant policies in the Guildford Borough Local Plan 2003 and the policies in the

recently adopted Local Plan: Strategy and Sites 2019 (LPSS) form part of Guildford's current development plan. Policies from the Local Plan 2003 were saved for development management purposes pursuant to the transitional provisions set out in the Planning and Compulsory Purchase Act 2004 (the 2004 Act). A number of these were superseded by the LPSS (listed in Appendix 8 of the LPSS) and those remaining will be fully superseded by the Local Plan: Development Management Policies.

- 3.2 The policies in the draft Local Plan have been prepared in accordance with the National Planning Policy Framework (NPPF) and the statutory framework prescribed in the Planning and Compulsory Purchase Act 2004 and the Local Planning Regulations (including the Duty to Cooperate). The National Planning Practice Guidance (NPPG) has also been used to inform the plan-making process.

#### **4. The Local Plan Process**

- 4.1 A Regulation 18 consultation is the first of two statutory consultations that must be undertaken prior to the submission of the draft Local Plan to the Secretary of State for examination. The second consultation is known as the Regulation 19 consultation. Sometimes councils will undertake two Regulation 18 consultations – one identifying 'issues and options' followed by another identifying 'preferred options'.
- 4.2 This was the approach undertaken in preparing the LPSS. In that instance carrying out two Regulation 18 consultations was justified given the number of 'spatial options' that were available to the Council is deciding where and how identified development needs should be met. Therefore, the benefits associated with a rigorous process of identifying and refining the spatial development strategy outweighed the additional time this added to the timetable (approximately a year).
- 4.3 However, given the limited number of real 'options' associated with detailed development management policies (in most instances the only choice is either having a policy or not having a policy and relying simply upon other policies and national policies/guidance). There is therefore a greater imperative to progress the Local Plan in a timely manner so that the policies can be given weight as part of the decision-taking process. As a result, officers recommend undertaking only one Regulation 18 consultation which includes 'issues, options and preferred options'.
- 4.4 It should be noted that undertaking only one Regulation 18 consultation does not preclude the Council's ability to change its 'preferred option' when it comes to preparing the Regulation 19 consultation version, also known as the Proposed Submission Local Plan. In contrast, only minor modifications can be made to the Regulation 19 consultation version prior to submission to the Secretary of State for examination. Should the Council wish to make main modifications at this stage, a further Regulation 19 consultation/targeted Regulation 19 consultation would need to be carried out prior to submission.
- 4.5 A revised Local Development Scheme (LDS) was approved by the Leader of the Council on 24 March 2020 to reflect the new timetable for the production and adoption of the Local Plan: Development Management Policies.

## 5. Regulation 18 consultation

- 5.1 As set out above, this Regulation 18 consultation will comprise a combined 'Issues, Options and Preferred Options'. It should be noted that this version does not set out specific policy wording. Instead it identifies issues relevant to Guildford which justifies the preferred approach to the policy that is being recommended for inclusion in the draft Local Plan together with the alternative policy options that were considered but rejected in favour of the preferred approach.
- 5.2 The feedback that is being sought is therefore not on the specific wording for each proposed policy but on the principle of what the policy is seeking to achieve and whether this approach and the general scope of the policy is what the Council should be pursuing as it continues to prepare the draft Local Plan. The specific wording of the policies will be contained in the Regulation 19 document which will be subject to a similar consultation process in due course.
- 5.3 The structure of the draft Local Plan is consistent with that contained in the LPSS. It comprises the same thematic chapters barring the 'strategic' chapter given that there are no strategic policies within this plan. The chapters therefore consist of: Housing, Protecting, Economy, Design, and Infrastructure and Delivery.
- 5.4 The policy topics are broad ranging and cover very detailed matters. A list of all the proposed policies and a brief summary as to their aims and how they seek to achieve those aims is contained in **Appendix 1**.

## 6. Consultations

- 6.1 In producing this draft document, the Planning Policy team has worked closely with the Development Management team in seeking to understand issues that have arisen in the regular use of the 2003 policies and to identify any gaps in the policy framework that need to be filled.
- 6.2 Officers have also undertaken a series of Local Plan Panel meetings. The Panel comprises cross party representation of members and is designed to act as a sounding board in the development of the Local Plan. These meetings have facilitated discussion between officers and members regarding the scope of policies and the approach to development proposed in the draft Local Plan.
- 6.3 The document has also been considered by the Place Making and Innovation Executive Advisory Board at its meeting on 17 February 2020.
- 6.4 This report seeks authority to commence a statutory consultation that will engage with all stakeholders and help to inform the Regulation 19 Proposed Submission Local Plan. As result of the constraints under which we are operating we will not be able to provide public events as part of this stage of consultation. We do, however, propose to enhance our online consultation with the information we were intending to provide at the public events. This will include information slides seeking to explain both the process, the content of the plan and how to make representations. The team will also be available on email or the telephone to answer questions and assist stakeholders in making formal responses.

## **7. Key Risks**

- 7.1 Planning decisions should be based on up to date Local Plans. Delays in completing the second part of the Guildford Borough Local Plan would mean decision makers are still being reliant on the extant policies contained in the 2003 Local Plan.
- 7.2 Adopting a new set of development management policies provides an opportunity of securing higher quality sustainable development in the borough and an opportunity to contribute positively to the climate change emergency (see Climate Change/ sustainability below).

## **8. Financial Implications**

- 8.1 It is anticipated that the cost in 2020-21 of undertaking the Regulation 18 consultation will be £75,000 which includes consultants, legal support and the consultation itself. There is sufficient budget in that financial year to cover this expenditure. Costs in 2021-22 are estimated at £95,000 (legal support, consultants, Regulation 19 consultation and programme officer) and additional budget will be needed. The costs in 2022-21 will be £175,000 (mainly legal and inspector's costs) and again additional funding will be required.

## **9. Legal Implications**

- 9.1 The current system of plan making is contained in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 ('Local Planning Regulations') and supported by the National Planning Policy Framework and Planning Practice Guidance. This report seeks authority to undertake consultation as prescribed by Regulation 18 of the Local Planning Regulations. That consultation is a preparatory step for the production of a draft Local Plan.
- 9.2 In carrying out the Regulation 18 consultation, the Council must comply with the requirements of the Local Planning Regulations, in particular Regulation 18. In addition, the Council must also comply with the consultation requirements set out in its Statement of Community Involvement (as provided under section 19(3) of the Planning and Compulsory Purchase Act 2004).
- 9.3 Following completion of the Regulation 18 consultation process (including the potential making and consultation upon modifications to the draft Local Plan), the draft Local Plan shall be prepared and publicised in accordance with the requirements of Regulations 19 and 35 of the Local Planning Regulations.
- 9.4 Under the Council's Constitution and in accordance with the statutory provisions contained in the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as amended), full Council has the power to make decisions in relation to the preparation and adoption of the Development Plan.

## **10. Human Resource Implications**

- 10.1 The production of a development planning document is lengthy and costly. The consultation process will necessitate occasional weekend and evening working for members of the team.
- 10.2 Following consultation there will be a process of recording and evaluation of the responses received. In past consultations this has involved employing additional temporary staff to help with the administration involved in processing a significant number of representations. This is likely to be the case with this consultation.

## **11. Equality and Diversity Implications**

- 11.1 All public authorities are required by the Equality Act 2010 to specifically consider the likely impact of their policy, procedure or practice on certain groups in society.
- 11.2 It is our responsibility to ensure that our policies, procedures and service delivery do not discriminate, including indirectly, on any sector of society. Council policies, procedures and service delivery may have differential impacts on certain groups with protected characteristics, and these will be highlighted in the Equalities Impact Assessment (EqIA) screening. Likely differential impacts must be highlighted, and described, as some may be positive. Where likely significant adverse differential impacts are identified, consideration should be given to opportunities to reduce or mitigate this through a full equalities impact assessment.
- 11.3 An EqIA screening was carried out for this Draft Local Plan (see **Appendix 3**). It is not considered necessary to carry out a full EqIA. This document will also be published on the Council's web site alongside the consultation document. Accordingly, it is considered that in approving this report, the Council will be acting in accordance with the public sector equality duty contained in section 149 of the Equality Act 2010.

## **12. Climate Change/Sustainability Implications**

- 12.1 The timely adoption of the Local Plan: Development Management Policies will enable the policies proposed to carry full weight as part of the development plan. The emerging policies in the Draft Local Plan supplement those in the LPSS and provide further detailed requirements. The proposed suite of policies cover a range of topics that will all contribute towards the achievement of Climate Change objectives and sustainable development.
- 12.2 The preferred policy approaches in the Draft Local Plan will have a positive impact in helping to secure sustainable and low impact development, Climate Change resilient development, and renewable and low carbon energy schemes. It will also contribute towards securing improvements in air and water quality, and biodiversity.
- 12.3 The Draft Local Plan is accompanied by an Interim Sustainability Appraisal (SA). (see **Appendix 4**). The SA is an iterative process that is prepared to accompany each version of the Local Plan. It incorporates the requirement for Strategic Environmental Assessment (SEA) and assesses each policy against



environmental, social and economic objectives. The Council has recently updated the SA Scoping Report. This identifies the scope and level of detail of the information to be included in the sustainability appraisal report. It sets out the context, objectives and approach of the assessment; and identifies relevant environmental, economic and social issues and objectives.

- 12.4 An interim Habitats Regulations Assessment (HRA) has also been prepared (see **Appendix 5**). This will ensure that the Draft Local Plan conforms with the Habitats Regulations and will not adversely affect any European protected habitats or species.

**13. Executive Advisory Board comments**

- 13.1 The draft Local Plan was put before the Place Making and Innovation Executive Advisory Board (EAB) on 17 February. The EAB made the comments listed in the table below to which responses have been provided. In general, it was not considered necessary to make changes to the draft Local Plan document for consultation as a result of EAB comments; however, the comments are helpful in informing the preparation of communication material that will accompany the consultation document. A further opportunity for EAB to comment on the draft policies, once developed, will occur during the preparation of the Plan for regulation 19 consultation.

<b>EAB Comments</b>	<b>Officer response</b>
EAB gave a strong message of support in relation to the scope of the proposed policies and the strength of their links to issues related to climate change, biodiversity and protection.	The support is welcomed. The document is focused on these matters - in total there are 17 policies within the Design chapter incorporating policies related to design, climate change and the historic environment. Furthermore, the Protecting chapter contains nine policies that incorporate policies related to biodiversity and the natural environment. These policies build upon and sit alongside the strategic policies in the recently adopted Local Plan: Strategy and Sites (2019).
The document as a whole is not easy for a resident to read and understand. Could every effort be made to provide explanations in plain English to help residents understand what the document is, how it relates to the existing Local Plan and what it seeks to achieve.	Every effort will be made as part of the consultation process to provide clear guidance on the issues raised by the EAB to make the process more accessible to residents. This will focus on the messaging that accompanies the consultation together with information and supporting material provided on the website
Could there be explanation provided regarding what the plan can and cannot do, especially in relation to climate change.	As part of the above commitment to improving communication around the consultation process, further clarification will be provided on the role that planning policies can and cannot play in terms of

<b>EAB Comments</b>	<b>Officer response</b>
	addressing climate change issues.
<p>Rural development policy needs a reference to vineyards in the text somewhere in terms of the opportunities it creates to contribute to the rural economy, including through tourism.</p>	<p>It is considered that paragraphs 3.2 and 3.3 of the draft Local Plan provide sufficient reference to the various agricultural uses present within the borough (this would include vineyards) and the support for diversification to benefit the rural economy and promote tourism.</p>
<p>Examples of high-quality design would greatly improve understanding of the document.</p>	<p>Providing visual examples of good design is not appropriate in a Local Plan which is a Development Plan Document (DPD) but is appropriate and can be very useful in a Supplementary Planning Document (SPD). SPDs supplement and provide additional detail on how policies in a DPD should be applied. The Council has already adopted a Residential Extensions and Alterations Guide SPD (2018) which provides detail on what constitutes high quality design for residential extensions or alterations.</p> <p>Furthermore, the Council has recently completed consultation on the Strategic Development Framework SPD which provides both general and site-specific design guidance for the strategic sites allocated in the LPSS. In addition to this, there is the recently published National Design Guide (2019) which sets out the 10 characteristics of beautiful, enduring and successful places together with detail as to how this can be successfully achieved. It also provides references to other guidance and good practice examples.</p> <p>The Government is intending to also publish a National Model Design Code which will set out detailed standards for key elements of successful design. Once published, further consideration can be given as to whether there is merit in producing additional Guildford specific guidance in the form an additional SPD.</p>

**14. Conclusion**

- 14.1 Publishing the draft Local Plan for public consultation is a key stage of the Local Plan making process and will enable the Local Plan part 2 to progress towards full adoption.
- 14.2 Completing and adopting this document will result in a fully up to date local plan and enable decision makers to assess planning applications against policies designed to achieve high standards of design and levels of sustainability contributing positively to the Council's climate change emergency declaration.

**15. Background Papers**

None

**16. Appendices**

Appendix 1: Policy aims summary document  
Appendix 2: Draft Local Plan  
Appendix 3: Equalities Impact Assessment (EqIA) screening  
Appendix 4: Interim Sustainability Appraisal (SA) – April 2020  
Appendix 5: Interim Habitats Regulations Assessment (HRA)

This page is intentionally left blank

## Policy aims summary document

### Housing

#### Policy H4: Housing density

- The aim of this policy is to enable appropriate residential densities in high quality design-led schemes.
- This is achieved by having a policy that requires making the best use of land whilst meeting a range of criteria. Higher densities are expected in the Town Centre, on strategic sites or within 500 metres of transport interchanges.

#### Policy H5: Housing extensions and alterations

- The aim of this policy is to achieve high quality designs for extensions and alterations.
- This is achieved by setting out detailed design criteria that consider the street scene, neighbours and the existing property. Policy criteria are also set out for basement extensions and annexes.

#### Policy H6: Housing conversion and sub-division

- The aim of this policy is to achieve high quality conversions and sub-divisions of buildings to flats, studios or bedsits.
- This is achieved by setting out design criteria for achieving high quality development.

### Employment

#### Policy E10: Rural development (including agricultural diversification)

- The aim of this policy is to support economic growth and local communities in rural areas.
- This is achieved by encouraging certain new economic uses and expansion of such uses in these areas, where proposed uses are not in conflict with national Green Belt policy.

#### Policy E11: Horse Related Development

- The aim of this policy is to address the adverse impacts that may arise from the approval of planning applications for horse-related development.
- This is achieved by setting criteria related to visual and neighbourhood amenity impacts, bridleway erosion and highway safety impacts.

### Protecting

#### Policy P6: Biodiversity in new developments

- The aim of this policy is to maximise biodiversity gains in all new developments
- This is achieved by establishing biodiversity as a priority in new developments and sets out the considerations when designing and delivering new developments.

#### Policy P7: Biodiversity net gain

- The aim is to provide clarity and detail for the requirement for developments to aim to achieve biodiversity net gain set out in policy ID4.

## Agenda item number: 9

### Appendix 1

- This is achieved by requiring a 20% net gain in biodiversity for all new developments, barring exceptions such as brownfield sites. It also sets out a methodology that accords with the emerging national net gains approach.

#### Policy P8: Woodland, trees, hedgerows and irreplaceable habitats

- The aim of this policy is to protect important woodlands, trees, hedgerows and irreplaceable habitats.
- This is achieved by protecting woodland, trees, hedgerows and irreplaceable habitats in order to ensure that these are not lost due to development.

#### Policy P9: Priority species and priority habitats on undesignated sites

- The aim of this policy is to protect species and habitats that are not covered by Policy ID4 (which protects designated sites).
- This is achieved by protecting priority species and habitats on undesignated sites.

#### Policy P10: Contaminated Land

- The aim of this policy is to support the remediation of despoiled, contaminated or unstable land on appropriate sites, whilst preventing increased risk to sensitive receptors from potential sources of contamination.
- This is achieved by placing requirements on developers to ensure that all appropriate investigations and assessments are carried out and provided with the application and that the land is made fit for its intended purpose through remediation, design and site layout.

#### Policy P11: Air Quality and Air Quality Management Areas

- The aim of this policy is to ensure new development does not have adverse impact on air quality and seeks opportunities to actively improve air quality.
- This is achieved by placing requirements on developers to ensure that new development does not give rise to adverse impacts on health and quality of life from air pollution, seeks to reduce exposure to poor air quality across the borough, and improve levels of air pollutants in Air Quality Management Areas (AQMA).

#### Policy P12: Water Resources and Water Quality

- The aim of this policy is to ensure new development does not have an adverse impact on water quality.
- This is achieved by placing requirements on developers to seek opportunities to improve water quality, avoid a detrimental impact on the flow or quantity of groundwater, and contribute towards Water Framework Directive water bodies maintaining or achieving 'Good Ecological Status'.

#### Policy P13: Sustainable Drainage Systems (SuDS)

- The aim of this policy is to provide greater clarity on what the Council expects from developers in relation to the SuDs schemes.
- This is achieved by placing requirements on developers to ensure that proposals for major development incorporate SuDS where required by the lead local flood authority and that the SuDs schemes satisfy technical standards and design requirements.

#### Policy P14: Regionally Important Geological/geomorphological Sites

- The aim of this policy is to protect Regionally Important Geological/Geomorphological Sites (RIGS).

- This is achieved by having a policy that grants permission for development where the value of RIGS sites will not be harmed unless clear justification is provided.

## Design

### Policy D4: Achieving High Quality Design and Local distinctiveness

### Policy D5: Privacy and Amenity

### Policy D6: Shopfront design

### Policy D7: Advertisements, hanging signs and illumination

### Policy D8: Public Realm

- The aim of these policies is to enable the delivery of high-quality, place sensitive and sustainable buildings, streets and spaces, that have regard to their surroundings, and historic and local character and which create an inclusive and attractive environment.
- This is achieved by setting design principles that will apply to all development proposals.

### Policy D9: Residential intensification

- The aim of this policy is to enable residential intensification and development within inset villages that respects the prevailing characteristic of the area.
- This is achieved by setting design principles that will apply to residential intensification schemes, including specific criteria for schemes within villages inset from the Green Belt.

### Policy D10: Agent of Change and Noise Impacts

- The aim of this policy is to ensure that new development can be integrated effectively with existing businesses, community facilities and 'noise-sensitive' uses such as residential uses, by developing a policy that articulates the 'agent of change' principle and manages noise impacts. The principle of 'agent of change' is that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.
- This is achieved by setting criteria for both 'noise-sensitive' and 'noise-generating' uses.

### Policy D11: Corridor of the River Wey and Guildford & Godalming Navigation

- The aim of this policy is to support the protection and enhancement of these corridors, including their visual quality, setting, amenity, ecological value, architectural and historic interest and views within and from.
- This is achieved by supporting development which promotes high quality contextual design; seeks to improve access to, from and positively contributes to enhancing the landscape and biodiversity of the riparian environment.

### Policy D12: Sustainable and low impact development

- The aim of this policy is to provide greater detail to supplement adopted Policy D2 where it supports sustainable and low impact development.
- This is achieved by setting requirements and expectations for energy efficiency, resource efficiency, water efficiency, waste and embodied carbon.

### Policy D13: Climate Change Adaptation

- The aim of this policy is to deliver climate change resilient development.
- This is achieved by setting out the considerations when designing and delivering climate change adapted development.

Policy D14: Climate change mitigation

- The aim of this policy is to deliver climate change mitigation measures.
- This could be achieved by setting out an increase to the LPSS carbon emissions standard for new buildings. Whilst we are awaiting the government's approach in relation to this issue, we consider it would be premature to put forward a preferred approach at this time.

Policy D15: Large scale renewable and low carbon energy

- The aim of this policy is to facilitate large scale renewable and low carbon development.
- This is achieved by potentially allocating land for low and zero carbon development and requiring any new energy developments to protect biodiversity.

Policy D16: Designated Heritage Assets

Policy D17: Listed Buildings

Policy D18: Conservation Areas

Policy D19: Heritage Assets: Scheduled Monuments & Registered Parks and Gardens

- The aim of these policies is to set out a positive strategy and operational detailing for managing new development affecting designated heritage assets in a manner that sustains and enhances their architectural and historical significance.
- This is achieved by placing requirements on developers to submit proportionate evidence and justification, setting out specific guidelines and design principles for the delivery of well-conceived development that sustains and enhances the significance of assets.

Policy D20: Non designated heritage assets

- The aim of this policy is to ensure that the value and significance of the borough's non-designated heritage assets are recognised and safeguarded so that they can continue to contribute to the richness of the historic environment and help to inform future development and regeneration.
- This is achieved by identifying a presumption for their retention and enhancement, as well as placing requirements on developers to support all applications with a proportionate evidence and justification.

## **Infrastructure**

Policy ID5: Protecting Open Space

- The aim of this policy is to provide detail and clarity for policy ID4 in order to enhance protection open space.
- This is achieved by preventing the loss of existing open space except for narrow circumstances defined in the NPPF.

Policy ID6: Open space in new developments

- The aim of this policy is to ensure that new developments provide new open spaces that provide best value in terms of multi-functional benefits.
- This is achieved by setting standards for open space provision in new developments to ensure that provision meets the open space needs arising from it.

Policy ID7: Sport, recreation and leisure facilities

- The aim of this policy is to support the appropriate provision of sport, recreation and leisure facilities.



- This is achieved by supporting development that provides, increases or improves opportunities for public sport, recreation and leisure, including schemes for new, replacement and extensions to existing facilities, and engineering works.

Policy ID8: Community facilities

- The aim of this policy is to ensure that community facilities are accessible to serve residents' needs.
- This is achieved by expecting that facilities are accessible by walking, cycling and public transport, resisting their loss and supporting associated complementary or ancillary uses.

Policy ID9: Retention of Public Houses

- The aim of this policy is to prevent the loss of public houses to other uses.
- This will be achieved through requiring that the business is marketed as a public house and alternative community facility for a continuous period of at least 18 months.

Policy ID10: Achieving a comprehensive Guildford borough cycle network

- The aim of this policy is to define a comprehensive Guildford borough cycle network, including the provision of, and improvements to, cycle routes and cycle parking facilities, enabling new developments to deliver apposite direct improvements and/or fund schemes through Section 106 contributions and/or the Community Infrastructure Levy, complementing any investments made by Surrey County Council the Local Highway Authority and other parties.
- This will be achieved by combining the outputs from Guildford BC's Route Assessment Feasibility Study for the Guildford urban area (2020) and Surrey CC's Guildford Local Cycling Plan (2015), the latter most particularly for the rest of the borough outside of the Guildford urban area.

Policy ID11: Parking standards

- The aims of this policy are:
  - in Guildford town centre to optimise the density of, and to limit the level of car trip making associated with, new residential developments
  - in the rest of the borough to avoid the problems of congested on-street parking in new residential developments and overspill parking on adjacent local streets
  - to achieve appropriate provision of car parking associated with non-residential developments across the borough
  - to achieve appropriate provision of cycle parking and electric vehicle charging facilities in new residential and non-residential developments
- This will be achieved by:
  - defining standards for the provision of off-street car parking for new developments in the borough, specifically with maximum standards for residential developments in Guildford town centre, minimum standards for residential developments in the rest of the borough and expected standards for non-residential developments across the borough
  - defining minimum cycle parking standards for new developments
  - defining electric vehicle charging standards for new developments

This page is intentionally left blank

# Guildford borough Local Plan: development management policies

---

## Issues, Options and Preferred Options

April 2020

Consultation under Regulation 18 of the Town and Country Planning  
(Local Planning) (England) Regulations 2012



## **Alternative formats**

If you would like to read this consultation document in a different format such as large print or a different language, please contact Planning Policy:

Telephone: 01483 444 471

Email: [Planningpolicy@guildford.gov.uk](mailto:Planningpolicy@guildford.gov.uk)

## Contents

Chapter 1: Introduction .....	5
Chapter 2: Housing.....	10
Topic - Housing Density.....	10
Policy H4: Housing density.....	12
Topic - Housing extensions and alterations, and residential sub-divisions and conversions .....	17
Policy H5: Housing extensions and alterations .....	18
Policy H6: Housing conversion and sub-division .....	22
Chapter 3: Economy .....	25
Topic - Rural Development (Including Agricultural Diversification).....	25
Policy E10: Rural development (including agricultural diversification) .....	28
Topic - Horse related development.....	32
Policy E11: Horse related development .....	34
Chapter 4: Protecting.....	37
Biodiversity and the Natural Environment.....	37
Introduction.....	37
Topic - Biodiversity in New Developments .....	43
Policy P6: Biodiversity in New Developments.....	49
Topic - Biodiversity net gain.....	52
Policy P7: Biodiversity net gain .....	56
Topic - Woodland, trees, hedgerows and irreplaceable habitats.....	58
Policy P8: Woodland, trees, hedgerows and irreplaceable habitats .....	62
Topic - Priority species and priority habitats on undesignated sites .....	64
Policy P9: Priority species and habitats on undesignated sites .....	65
Topic - Contaminated Land.....	67
Policy P10: Contaminated Land .....	68
Topic - Air Quality and Air Quality Management Areas .....	70
Policy P11: Air Quality and Air Quality Management Areas .....	72
Topic - Water Resources and Water Quality .....	74
Policy P12: Water Resources and Water Quality.....	76
Topic - Sustainable Drainage Systems.....	78
Policy P13: Sustainable Drainage Systems .....	80
Topic - Regionally Important Geological / Geomorphological Sites .....	82
Policy P14: Regionally Important Geological / Geomorphological Sites.....	82
Chapter 5: Design.....	84
Design .....	84
Introduction.....	84
Topic - Achieving a High Quality Design and Local Distinctiveness.....	87
Policy D4: Achieving High Quality Design and Local distinctiveness .....	89
Topic - Privacy and Amenity .....	92
Policy D5: Privacy and Amenity .....	92
Topic - Shopfronts, Advertisements and Hanging Signs .....	94
Policy D6: Shopfront Design .....	94
Policy D7: Advertisements, hanging signs and illumination .....	96
Topic - Public Realm.....	98
Policy D8: Public Realm .....	99
Topic - Residential intensification .....	101
Policy D9: Residential Intensification .....	101
Topic - 'Agent of Change' and Noise Impacts .....	104

Policy D10: ‘Agent of Change’ and Noise Impacts.....	106
Topic - The Corridor of the River Wey and the Guildford and Godalming Navigation.....	110
Policy D11: Corridor of the River Wey and Guildford and Godalming Navigation. ....	111
Climate Change and Sustainability .....	113
Introduction.....	113
Topic - Low carbon and low impact development.....	119
Policy D12: Sustainable and Low Impact Development .....	123
Topic - Climate Change Adaptation .....	126
Policy D13: Climate Change Adaptation .....	128
Topic - Climate Change Mitigation.....	130
Policy D14: Climate change mitigation.....	131
Topic - Large scale renewable and low carbon energy .....	132
Policy D15: Large Scale Renewable and Low Carbon Energy .....	134
The Historic Environment.....	136
Introduction.....	136
Topic – Designated Heritage Assets .....	142
Policy D16: Designated Heritage Assets .....	142
Topic - Listed Buildings.....	148
Policy D17: Listed Buildings .....	149
Topic - Conservation Areas .....	152
Policy D18: Conservation Areas.....	154
Topic - Scheduled Monuments & Registered Parks and Gardens .....	157
Policy D19: Scheduled Monuments & Registered Parks and Gardens .....	159
Topic - Non-Designated Heritage Assets .....	162
Policy D20: Non-Designated Heritage Assets.....	164
Chapter 6: Infrastructure and Delivery .....	168
Community Facilities and Open Space, Sport and Recreation .....	168
Introduction.....	168
Topic - Protecting open space .....	170
Policy ID5: Protecting Open Space .....	171
Topic - Open space in new developments.....	173
Policy ID6: Open Space in New Developments .....	175
Topic - Sport, recreation and leisure facilities.....	179
Policy ID7: Sport, Recreation and Leisure Facilities .....	179
Topic - Community facilities .....	181
Policy ID8: Community Facilities .....	184
Topic - Retention of public houses.....	187
Policy ID9: Retention of Public Houses.....	190
Topic - Achieving a comprehensive Guildford borough cycle network .....	193
Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network .....	195
Topic - Parking Standards .....	197
Policy ID11: Parking Standards.....	199
Parking Standards Tables: Preferred Option .....	202
Appendix 1: Cycle network plan from Guildford BC’s Route Assessment Feasibility Study (2018)	209
Appendix 2: Cycle network plan from Surrey CC’s Guildford Local Cycling Plan (undated) .....	212

# Chapter 1: Introduction

## Summary

- 1.1 The Council adopted the Local Plan: strategy and sites in 2019. We have now started to work on the second part of the Local Plan, the Guildford borough Local Plan: development management policies.
- 1.2 The **Local Plan: strategy and sites** document sets out our vision, objectives and approaches to development (our strategy) and the location of key sites in our area between now and 2034. The **Local Plan: development management policies** document will provide further and more detailed planning policies to use when we determine planning applications.
- 1.3 This document invites you to comment on a series of key planning issues for the borough and the options available that could help us address them. You can also suggest any issues or options you feel are missing. You are welcome to comment on every issue, option and preferred option in the document or just the ones that you are specifically interested in.
- 1.4 This is an opportunity for you to have your say on planning in the borough. The diagram on page 9 shows the key stages when there will be further opportunities to comment as the Local Plan: development management policies progresses. In addition, our Local Development Scheme (LDS)<sup>1</sup> sets out the detailed timetable for the development of the Local Plan and provides further information on the consultation stages.
- 1.5 What you tell us during this consultation will help us to develop the best development management policies for Guildford borough. We'd encourage you to get involved.

## How to read this plan

### Blue boxes

contain the preferred policy option, the alternative options and the justification for the choice of options and selection of the preferred option.

### Green boxes

contain the Relevant Objectives from LPSS taken from the Guildford borough Local Plan: strategy and sites 2015-2034.

### Pink boxes

contain questions and give the opportunity for you to respond and make suggestions.

<sup>1</sup> Available online at: <https://www.guildford.gov.uk/newlocalplan/lids>.

## Introduction

- 1.6 Guildford Borough Council is preparing a new document called 'Local Plan: development management policies' for the Borough and this is your first opportunity to take part in its preparation.
- 1.7 The Guildford borough Local Plan consists of two parts:
- Part 1:** The Local Plan: strategy and sites. This sets out our vision, aims and strategy for the borough up to 2034. The document contains overarching planning policies and allocates land for housing, employment, community facilities and other types of development. This document was adopted on 25th April 2019.
- Part 2:** The Local Plan: development management policies. This document will have detailed development management policies which will be used to determine planning applications in the borough. We are currently inviting your comments on this document.

## About this consultation

- 1.8 This consultation aims to gain your views on the key planning issues and preferred options for development management policies for Guildford borough. This is sometimes referred to as a Regulation 18 consultation<sup>2</sup>. The document provides context, with preferred and alternative options for each policy set out in the blue boxes. The pink boxes contain questions seeking your feedback and suggestions on our preferred options.
- 1.9 You can submit your feedback by completing this form online at:
- <https://guildford.inconsult.uk/xxxx>
- 1.10 Alternatively, you can email your comments to:

Email: [localplan@guildford.gov.uk](mailto:localplan@guildford.gov.uk)

If it is not possible to use electronic communication, send your comments by post to:

Planning Policy (Local Plan: DMP consultation)  
Guildford Borough Council  
Millmead House  
Millmead  
Guildford  
Surrey  
GU2 4BB

**Please return your comments to Guildford Borough Council by XX MONTH 2020.**

---

<sup>2</sup> Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 - 'Preparation of a Local Plan'.



## Plan- making

- 1.11 Local Plans must comply with the relevant law as set out in the Planning and Compulsory Purchase Act 2004 (and amendments in subsequent Acts) and the Localism Act 2011 (covering the Duty to Cooperate and Neighbourhood Planning). These acts set out the requirements and consultation processes needed to produce a Local Plan. Specific plan-making requirements are set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. Other legal frameworks, including the European Habitats Directive, are also currently relevant to the plan-making process.
- 1.12 The new Local Plan must be consistent with the National Planning Policy Framework (NPPF). The NPPF instructs us to prepare a plan that is positive about development and requires councils to cooperate with neighbouring authorities when producing their plan, alongside more detailed requirements. National Planning Practice Guidance (NPPG) also guides us in the plan-making process.
- 1.13 To meet the Duty to Cooperate<sup>3</sup> requirements we will engage in constructive, active and ongoing dialogue with neighbouring local authorities and other relevant organisations during the plan-making process.
- 1.14 For this Local Plan to be found sound by a Planning Inspector (who is appointed by the Secretary of State) it must be positively prepared, justified, effective and consistent with national policy. We can only formally adopt the Local Plan once it has been found sound by a Planning Inspector.

## The Issues and Options Local Plan development management policies document

- 1.15 The Local Plan: development management policies document must go through several stages and meet many criteria before it can be adopted. We are currently at a very early stage in producing the document. The current document sets out various issues, options and our preferred options for potential development management policies that will help manage development across Guildford borough.
- 1.16 The document focusses on a series of key issues for the borough and the various options that could help address them. It then highlights what the Council's preferred option is for addressing the development management issues.
- 1.17 The policy options do not include replicating or re-introducing Local Plan 2003 policies. This is because carrying forward the wording of the 2003 policies is not considered a reasonable alternative as much has changed since these policies were first drafted. In looking to have a policy on a specific matter, new wording needs to be considered and checked for consistency with national policy and guidance which has changed since the Local Plan 2003 was prepared.

---

<sup>3</sup> As set out in the Localism Act 2011 and Local Plan Regulations 2012.

- 1.18 We are seeking your thoughts on the issues and options identified in this document, and the Council's preferred option.

## Next steps

- 1.19 As part of the next stage, we will analyse all the responses we receive. Before drafting the development management policies, we will consider many factors such as public and specialist feedback on the issues, options and preferred options, evidence base, national policy & guidance and planning law and regulations. The draft policies will also be informed by the Council's strategic visions and plans including the Corporate Plan, Economic Strategy, Housing Strategy and the Local Plan: strategy and sites.
- 1.20 Once drafted, the policies will be consistent with and sits alongside the strategic policies and will be used when determining planning applications.
- 1.21 There will be another public consultation on the draft document next Spring, before a final consultation on the proposed submission document in Autumn 2021, or as updated in our LDS. At the end of the process, an independent planning inspector examines the proposed new Local Plan. The inspector is there to make sure we have met the legal requirements in preparing the plan, including working with others such as neighbouring councils and service providers. The plan must be considered by the Council to be 'sound' when it is submitted to the Planning Inspectorate.
- 1.22 Many of the preferred options for policies contained within this plan will (after adoption) supersede the saved policies of the Guildford Local Plan 2003. The extant policies in the 2003 plan will not form part of the development plan following the adoption of the emerging plan. In some cases, supplementary planning documents (SPDs) will be produced to expand upon and support the policies contained within the Local Plan: strategy and sites document and the future Local Plan: development management policies document. SPDs provide more detailed guidance to build upon planning policies and help guide planning applications and decisions.

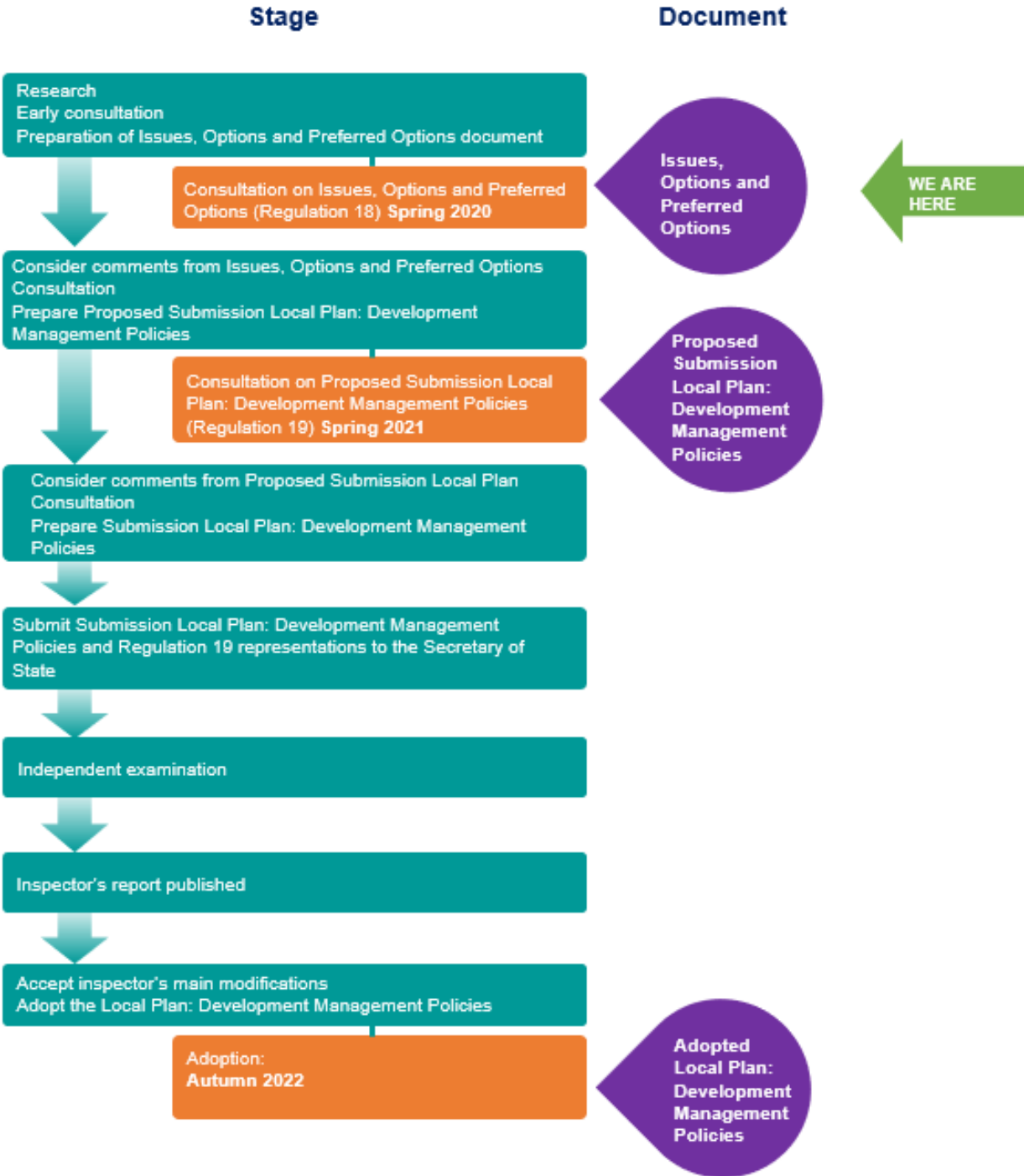
## Key stages in preparing this document

- 1.23 The key stages in preparing this document are set out in the following diagram. More detailed timings will be set out in the latest Local Development Scheme<sup>4</sup>, available to view on the Council's website. This consultation is your opportunity to get involved in the early stages of policy formulation.

---

<sup>4</sup> Available online at: <https://www.guildford.gov.uk/newlocalplan/lids>.

# Key Stages in preparing the Local Plan: Development Management Policies document



## Chapter 2: Housing

### Topic - Housing Density

#### Introduction

- 2.1 National policy seeks to deliver high quality housing of an appropriate density in Guildford borough. This section of the document considers the issues and options relevant to this matter and sets out the Council's preferred policy approach.

#### National policy context

- 2.2 National planning policy states that the creation of high quality building and places is fundamental to what the planning and development process should achieve. It requires planning policies and decisions to promote and support development that makes efficient use of land or uses underutilised land and buildings for housing. This is set out in the National Planning Policy Framework, in particular in paragraphs 118,122 - 124.
- 2.3 Further guidance on housing is also set out in Planning Practice Guidance. This includes guidance on the effective use of land and identifying appropriate densities<sup>5</sup>. This includes considerations of accessibility, characterisation and design studies, environmental and infrastructure assessments and the viability of the site.
- 2.4 The National Design Guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. Density is discussed in paragraphs 58, 64, 65, 79, 126. The guidance provided is that well-designed new development will make efficient use of land with an amount and mix of development and open space that optimises density. The appropriate density will result from the context, accessibility, the proposed building types, form and character of the development. It will also relate well to and enhance the existing character and context. The guide states that to optimise density, it may be necessary to provide public transport infrastructure or to improve existing local transport services. A transport hub may represent an opportunity for a local increase in density, where appropriate to local context and character.

#### Local strategies and evidence

- Strategic Housing Market Assessment 2015 (pages 129 & 162)

#### Relevant policies in Guildford Borough Local Plan 2003

- Policy H4 Housing in urban areas

---

<sup>5</sup> Available online at: <https://www.gov.uk/guidance/effective-use-of-land>.

**Relevant policies in Guildford borough Local Plan: strategy and sites 2019**

- Policy S3 Delivery of development and regeneration within Guildford Town Centre – efficient use of land part (3)
- Policy H1 Homes for all
- Policy D1 Place shaping - density part (5)
- Policy ID3 Sustainable transport for new developments

**Relevant Guildford Borough Council supplementary planning guidance**

- Residential Design Guide 2004

**Relevant Objectives from LPSS**

- Objective 1:** To deliver sufficient sustainable development that meets all identified needs.
- Objective 2:** To improve opportunities for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities.
- Objective 3:** To ensure that all development is of high-quality design and enables people to live safe, healthy and active lifestyles.
- Objective 4:** To retain the distinct character and separate identities of our settlements.
- Objective 5:** To protect and enhance our heritage assets and improve the quality of our built and natural environment.
- Objective 7:** To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.

## Policy H4: Housing density

### Issues

- 2.5 National policy and our own local objectives seek to have sustainable and well-designed development that makes the optimum use of land whilst meeting the housing needs of our community. However, we are often faced with issues which makes achieving these aspirations difficult. The challenges within Guildford are set out below:
1. Guildford borough has land designations such as Area of Outstanding Natural Beauty (AONB), Thames Basin Special Protection Areas and Green Belt that restrict developable land, so it is important to make the best use of land that is suitable for development.
  2. Recognising the benefits of sustainable higher density developments whilst carefully managing the impact of density and development on the character of local areas.
  3. Desire to accommodate new homes in a responsible way by making efficient use of land whilst at the same time ensuring a good balance of home types and sizes. There can be a tendency for developments to focus on large 4-5 bed homes which don't make the optimal use of land, although this will be addressed in part by policy H1 requiring a mix of house sizes appropriate to the site size, characteristics and location. There is a direct relationship between the mix of homes on a site and density, for example more 1 or 2 bed roomed homes on a site would have the effect of increasing the density calculated for the area. The impact of low housing density ultimately results in the use of more land for housing developments which can be unsustainable.
- 2.6 Ensuring the effective use of land can be achieved through setting out expectations and criteria within Guildford Borough Council's Development Management policies.

### Policy approaches to housing density

- 2.7 Good planning and development will help create well-designed, sustainable homes built at an appropriate density for the location. The best way to achieve this is by setting out the Council's clear expectations and requirements.
- 2.8 The Council's preferred approach is to prepare a robust policy encouraging maximising the optimal use of land through appropriate densities. Factors such as site size, characteristics and location can enable higher densities. The Town Centre is the most sustainable location and opportunities for new housing development are often scarce, so housing density needs to be optimised. Strategic sites provide the opportunity to have higher densities due to their size and being designed comprehensively with their own identity<sup>6</sup>. Sites within 500 metres of existing or planned transport interchanges can be sustainable so it is important to optimise densities where appropriate. This is set out in the table below.

---

<sup>6</sup> Guildford borough Local Plan: Strategy and Sites 2019 Policy D1: Place shaping part 5.

## Preferred option to housing density

The aim of this policy is to enable appropriate residential densities in high quality design-led schemes by having a policy that requires:

- 1) Maximising the optimal use of land by building homes at the most appropriate density taking into account:
  - a) the site size, characteristics and location,
  - b) the urban grain of the area and appropriate building forms and sizes for the site, and
  - c) the context and local character of the area.
- 2) Higher density development in the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges, unless there are strong reasons why it would be inappropriate.

## Alternative options to housing density

- 1) To not have a specific policy covering this issue but to consider planning applications against the NPPF, Planning Practice Guidance and other relevant policies in the Local Plan strategy and sites 2019.
- 2) To ensure developments optimise the use of land through a prescriptive policy setting out minimum density ranges for the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges, irrespective of local context and character, unless there are strong reasons why it would be inappropriate<sup>7</sup>.

## Justification for the choice of options and selection of preferred option

### Reasons the options were selected

A number of options have been considered to enable a comparison between them in terms of their ability to meet legislative requirements, Relevant Objectives from LPSS and the highlighted planning issues specific to Guildford borough.

### Reasons for selecting the preferred option in light of the other options

Some of the alternative options are less specific to Guildford borough as they rely on generic guidance within the NPPF or PPG, or on the broader strategic Local Plan policies.

<sup>7</sup> See paragraph 123 part (a) of the NPPF.

The NPPF and PPG set out a range of considerations and tools that can assist in establishing appropriate densities on a site or in a particular area, such as accessibility, characterisation and design studies, environmental and infrastructure assessments and site viability. This is considered preferable to setting minimum density ranges for specific locations (the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges). To set out minimum density ranges is considered to be restrictive and complicated to ascertain and will limit the flexibility that is often needed when determining a planning application.

The Council's preferred option requires the optimal use of land by building homes at the most appropriate density. It is considered the most appropriate approach for Guildford. To apply prescriptive density ranges would restrict the flexibility to take all the site constraints and considerations into account. Sites within Guildford can often have their own challenges, such as the topography of the site, being partially within the flood plain or the impact on views which are crucial to the character and setting of the town centre. Flexibility is needed to ensure the right development can take place. Whilst seeking the optimum use of the land there also needs to be flexibility to ensure that a well-balanced range of housing can come forward to meet Guildford's housing needs.

When considering the relevant issues and options for housing density in Guildford, the Council's preferred approach is to enable well-designed housing at an appropriate density. There will be a presumption for higher density development in the Town Centre. In the Town Centre there are more limited opportunities for development, yet it is a sustainable location so housing density needs to be optimised. There will also be a presumption for higher density development on strategic sites and within 500 metres of existing or planned transport interchanges. This is because the size of strategic sites will enable thoughtfully designed higher densities, and being in close proximity to transport interchanges enables opportunities to optimise densities on sustainable sites. The results of the assessment suggest that the preferred option provides a greater amount of guidance and flexibility specific to Guildford borough to help meet the relevant Local Plan objectives.



## Definitions

**Character:** The character of an area is the sense of place, history and identity that it has. Character can have many diverse forms. This can include distinctive landscapes and topography, street patterns and plot layouts, buildings functions and architectural styles, special spaces, skylines and roofscapes, building materials, local culture and traditions. The character of an area might have a distinctive and uniform architectural character typical of an historic planned estate or modern town suburb, or a more varied and diverse character of building types and spaces such as within a rural villages, or a historic landscape designed through past workings, or ornamental planting.

**Context:** A building or site context usually refers to the surrounding physical environment, but can also refer to the social, economic and political nature of a place.

**Density:** Density is calculated by dividing the number of dwellings by the site area (in hectares) which equals dwellings per hectare (dph). For housing development, net density which includes only areas directly associated with the housing should be used, rather than gross density which includes all uses. Areas such as access roads within the site, private garden space, car parking areas, incidental open space, landscape and children's play areas should be included in the calculation, but major distributor roads, primary schools, open spaces serving a wider area and significant landscape buffer strips should not.

### Transport interchange:

In this plan<sup>8</sup> we define a transport interchange as rail stations and/or bus stations within the urban areas or in close proximity to the district centres and Strategic Employment Sites. Interchanges include:

- Guildford Rail Station
- Guildford Bus Station (and any future alternative replacement)
- London Road (Guildford) Rail Station
- Ash Rail Station
- Ash Vale Rail Station
- North Camp Rail Station
- Horsley Rail Station (East Horsley)
- Proposed Guildford East (Merrow) Rail Station
- Proposed Guildford West (Park Barn) Rail Station

All transport interchanges are shown on the Policies Map and the 500m catchment around the interchange is shown on maps included in Appendix 3 of the Local Plan strategy and sites document.

---

<sup>8</sup> Also as defined in the LPSS, page 70.

**Urban grain:** The pattern of streets and paths, and the layout of routes and public spaces and the way plots have developed with this pattern. Historic streets and paths, which traditionally has the greatest intensity of movement, has a fine grain with typically many small plots and uses interspersed within routes for movement. Street patterns are said to be coarse grained where routes are more direct and more spaced out and development block forms are larger, often beyond the commercial heart of the town or neighbourhoods. Where patterns of development are more varied and spread out and interspersed with more open space along routes an area might be said to have a loose grain.

**Question 1:**

Do you agree with the preferred option to address housing design and density in Guildford?

Do you have any other comments or suggestions?

## Topic - Housing extensions and alterations, and residential sub-divisions and conversions

### Introduction

- 2.9 National policy seeks to deliver high quality housing. Extensions and alterations to homes must also reflect our aspirations for well-designed and considerate development. This section of the document considers the issues and options relevant to this issue and sets out the Council's preferred policy approach.

### National policy context

- 2.10 National planning policy states that the creation of high quality building and places is fundamental to what the planning and development process should achieve. This is set out in the National Planning Policy Framework, in particular in paragraphs 118(e) (upward extensions) 122(e), 124, 127-131. As set out in paragraph 130 of the National Planning Policy Framework, permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.
- 2.11 Further guidance on housing and design is also set out in Planning Practice Guidance.
- 2.12 The National Design Guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. Although this is broader guidance more relevant to larger schemes the principles provide a good steer on how important good design, high quality and detailing, such as materials, are.

### Relevant policies in Guildford Borough Local Plan 2003

- Policy H8 Extensions to dwellings in the urban areas
- Policy H9 Extensions to dwellings in the countryside (superseded by LPSS Policy P2)

### Relevant policies in Guildford borough Local Plan: strategy and sites 2019

- Policy H1 Homes for all
- Policy P2 Green Belt

### Relevant Guildford Borough Council supplementary planning guidance

- Residential Design Guide 2004
- Residential extensions and alterations SPD 2018

### Relevant Objectives from LPSS

**Objective 2:** To improve opportunities for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities.

**Objective 3:** To ensure that all development is of high-quality design and enables people to live safe, healthy and active lifestyles.

**Objective 4:** To retain the distinct character and separate identities of our settlements.

**Objective 5:** To protect and enhance our heritage assets and improve the quality of our built and natural environment.

**Objective 7:** To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.

## Policy H5: Housing extensions and alterations

### Introduction

2.13 The Council receives many planning applications for residential extensions and alterations, so it is important to set out our expectations. Extensions to houses can be a convenient way of providing additional living space for growing households. Some extensions or alterations to residential properties may benefit from 'permitted development' rights, which enable households to extend or alter their property without the need for planning permission. For larger extensions and alterations that require planning permission the Council will consider them against a new development management policy as suggested below.

### Issues

2.14 National policy and our local objectives recognise the importance of access to suitable housing, which can include adaptations to make housing fit for purpose. There is a clear emphasis on high quality design that improves the quality of our built environment and respects the distinct character and separate identities of our settlements.

2.15 However, issues within the borough can make achieving these objectives difficult. The challenges within Guildford are set out below.

1. The aspiration for well-designed extensions yet poorly designed and insensitive designs submitted; often space and cost effectiveness is prioritised over good design.
2. The growing trend for basement developments and resultant impact on neighbours.
3. The population is ageing, people are living longer, and the cost of care is rising which may lead to more demand for home adaptations and annexes which enable families of different generations to live together.
4. Families are out-growing their home but unable to move to larger properties due to the shortage of housing, high house prices and the slow turn-over of housing stock.

## Policy approaches to housing extensions and alterations

- 2.16 Requiring good design will maintain and enhance Guildford’s residential areas. The Council’s preferred approach is to have a policy which clearly sets out its expectations and parameters to achieve sensitive and well-designed extensions and alterations. This will replace the Guildford borough Local Plan 2003 H8: Extensions to dwellings in the urban areas and policy H9: Extensions to dwellings in the countryside. Extensions within the Green Belt are also covered by Guildford borough Local Plan 2019 Policy P2: Green Belt and paragraph 145 of the NPPF<sup>9</sup>, which states that extensions and alterations must not result in disproportionate additions over and above the size of the original dwelling.
- 2.17 The Council’s preferred approach is set out in the table below.

<b>Preferred option to housing extensions and alterations</b>
<p>The aim of this policy is to achieve high-quality design for extensions and alterations by having a policy that addresses the following issues:</p> <ol style="list-style-type: none"><li>1) Requiring residential extension and alteration schemes to have regard to the impact on the streetscene, neighbours and the existing property such that they:<ol style="list-style-type: none"><li>a) respect the existing context, scale and character of the adjacent buildings and immediate surrounding area,</li><li>b) have no unacceptable impact on the amenities enjoyed by the occupants of adjacent buildings in terms of privacy and access to sunlight and daylight, and</li><li>c) are consistent with the form, scale, character and proportion of the existing building.</li></ol></li></ol> <p><b>Basement extensions</b></p> <ol style="list-style-type: none"><li>2) Proposals for basement extensions are required to:<ol style="list-style-type: none"><li>a) be well-designed, proportionate and ensure that their potential impact on the local environment, trees, tree roots, garden area, architectural character of the property, neighbouring properties and residential amenity is acceptable, and</li><li>b) have no adverse impact on local ground water conditions, flooding or drainage issues.</li></ol></li></ol> <p>Applications involving the formation of a basement are expected to include a structural impact report and this will be a requirement for the Local Validation List. The report should show that there is no adverse impact to land and the structural stability of the application site and adjacent properties.</p>

<sup>9</sup> NPPF page 42, paragraph 145 (c) “...the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are...the extension and alteration of a building provided that it does not result in disproportionate additions over and above the size of the original dwelling”.

### **Annexes**

- 3) Development of a residential annex will be permitted if:
  - a) it is an extension that would be subordinate in scale to the main residence,
  - b) it is fully integrated into the main dwelling house unless it is an outbuilding,
  - c) it clearly and unequivocally shares either bathroom or kitchen facilities with the main dwelling house,
  - d) it cannot be used as a self-contained dwelling, and
  - e) it would share the vehicular access and garden area.

All residential extensions are expected to have regard to the Guildford Borough Council Residential Extensions and Alterations SPD 2018 or any document which replaces it.

### **Alternative option to housing extensions and alterations**

- 1) To have no policy and rely on the National Planning Policy Framework, Planning Practice Guidance and relevant policies in the Local Plan strategy and sites 2019.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the alternative was selected**

'No policy' is the only reasonable alternative as no further options were identified.

#### **Reasons for selecting the preferred option in light of the alternatives**

The alternative option is less specific to Guildford borough, by relying on generic guidance within the National Planning Policy Framework or Planning Practice Guidance, or relying on the broader strategic Local Plan policies.

The NPPF tends to focus on new housing rather than extensions and alterations so is not detailed enough to give guidance when considering these types of planning applications.

Planning Practice Guidance could be used when considering design but again is too broad to be relied upon.

The Council's preferred option requires residential extensions and alterations to comply with specific policy criteria. It breaks the overarching types of residential alterations into subsections and gives specific criteria. Considering the options available, it was considered preferable to have a bespoke policy for Guildford to specifically address these planning issues in more detail and provide guidance that will be useful to both the applicant and the decision maker.

The results of the assessment suggest that the preferred option provides a greater amount of guidance specific to Guildford to help meet the relevant Local Plan objectives.

## Definitions

**Annex:** Additional accommodation for dependents and family members which must remain ancillary to the main house. One main facility, usually the kitchen, is shared with the main dwelling.

**Dwelling:** A single self-contained unit of accommodation<sup>10</sup>. Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household's accommodation are behind a single door which only that household can use. Non self-contained household spaces at the same address should be counted together as a single dwelling.

### Extensions and Alterations:

Includes roof extensions of dwellings.

**Subordinate:** Smaller scale, subservient and dependant on the main dwelling, with a shared facility. It is not self-contained.

### Question 2:

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

Do you have any other comments or suggestions?

---

<sup>10</sup> As defined in the Governments glossary at <https://www.gov.uk/guidance/housing-statistics-and-england-housing-survey-glossary/a-to-z>.

## Policy H6: Housing conversion and sub-division

### Introduction

- 2.18 The conversion or sub-division of houses is a popular way to provide additional living units. Some conversions and sub-divisions may benefit from 'permitted development' rights, which enable changes to be made to a property without the need for planning permission. For alterations that require planning permission the Council will consider them against a new development management policy as suggested below.

### Issues

- 2.19 National policy and our local objectives recognise the importance of access to suitable housing, which includes a variety of types of housing. Smaller housing units, such as flats, studio flats and bedsits can provide a valuable source of accommodation to meet the needs of some of our local population. They can offer a more affordable way to live in Guildford borough, particularly for students, young adults, low paid workers and key workers. However, it is important to get the balance of housing types right in an area to ensure it remains a vibrant and mixed community and maintains the character of the area.
- 2.20 Issues within the borough can make achieving these objectives difficult. The challenges within Guildford are set out below.
- The aspiration for well-designed and considered conversions and sub-divisions yet poorly designed and insensitive schemes submitted; often space and cost effectiveness are prioritised over good design.
  - The demand for sub-division and conversions and the resultant impact on the neighbourhood in terms of issues such as outside storage, bins, parking issues.

### Policy approaches to housing conversion and sub-division

- 2.21 Requiring good design will maintain and enhance Guildford's residential areas. The Council's preferred approach is to have a policy which clearly sets out its expectations and parameters to achieve thoughtful and well-designed sub-divisions and conversions. Guildford borough Local Plan 2003 Policy H7: Conversions (superseded by LPSS Policy H1) is most relevant. Policy H1 part (8) sets out criteria for houses in multiple occupation that require planning permission, and also provides further guidance within the reasoned justification (paragraph 4.2.23 - 4.2.25). It is important that the existing criteria in policy H1 (8) is compatible and consistent with the proposed criteria of Policy H6 due to overlapping considerations.
- 2.22 The Council's preferred approach is set out below.



## Preferred option to housing conversion and sub-division

The aim of this policy is to achieve high-quality conversions and sub-divisions by having a policy that addresses the following issues:

### Subdivisions and conversions

- 1) Development involving the conversion of dwellings into flats, studios or bedsits will be supported provided that:
  - a) the balance of housing types and character of the immediate locality would not be adversely affected; and
  - b) there is sufficient amenity space available; and
  - c) it would not be detrimental to the amenity of neighbouring residents.

## Alternative option to housing conversion and sub-division

- 1) To have no policy and rely on the National Planning Policy Framework, Planning Practice Guidance and relevant policies in the LPSS.

## Justification for the choice of options and selection of preferred option

### Reasons the alternatives were selected

'No policy' is the only reasonable alternative as no further options were identified.

### Reasons for selecting the preferred option in light of the alternatives

The alternative option is less specific to Guildford borough, by relying on generic guidance within the National Planning Policy Framework or Planning Practice Guidance or relying on the broader strategic Local Plan policies.

The NPPF tends to focus on new housing rather than sub-divisions and conversions so is not detailed enough to give guidance when considering these types of planning applications.

Planning Practice Guidance is not specific enough on this particular issue to be relied upon.

The Council's preferred option requires residential conversions and subdivision to comply with specific policy criteria. Considering all the options available, it was considered preferable to have a bespoke policy for Guildford to specifically address these planning issues in more detail, ensure compatibility with Policy H1 Homes for all and provide guidance that will be useful to both the applicant and the decision maker.

The results of the assessment suggest that the preferred option provides a greater amount of guidance specific to Guildford to help meet the relevant Local Plan objectives.

## Definitions

**Dwelling:** A single self-contained unit of accommodation<sup>11</sup>. Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household's accommodation are behind a single door which only that household can use. Non self-contained household spaces at the same address should be counted together as a single dwelling.

### **Household Accommodation:**

Part of a shared dwelling if (a) the type of accommodation is part of a converted or shared house (including bedsits), (b) not all the rooms, including the kitchen, bathroom and toilet, are behind a door only that household can use, and (c) there is at least one other such household accommodation at the same address with which it can be combined to form a shared dwelling.

### **Question 3:**

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

Do you have any other comments or suggestions?

---

<sup>11</sup> As defined in the Governments glossary at <https://www.gov.uk/guidance/housing-statistics-and-england-housing-survey-glossary/a-to-z>.

## Chapter 3: Economy

### Topic - Rural Development (Including Agricultural Diversification)

#### Introduction

- 3.1 Development of an economic nature in the countryside has the potential to meet local needs and enable prosperous, sustainable communities. This includes the re-use and adaptation of existing rural-based businesses as well as the development of new ones. Businesses in rural areas often directly serve local communities and their development, diversification and expansion can help to support local and borough-wide economies. Many businesses, such as those for agriculture and forestry, are also necessarily based in rural areas in order to have access to the land upon which they depend. Whilst development in some rural areas is restricted by Green Belt designation, there are nevertheless certain types of economic development that may, subject to careful assessment against local and national planning policies, be suitably achieved in these areas, as well as in areas of countryside that are not designated as Green Belt, without damaging the countryside's, tranquil nature, biodiversity, local character and landscape value.
- 3.2 Agricultural policy has also changed considerably in the past few decades, and farm/agricultural land owners and owners of other land-based rural businesses are increasingly seeking to diversify their economic activities to make more profitable use of their land and buildings, thereby sustaining their businesses in the long-term. The average income from farming enterprises is low in comparison to other industries, and income from farming is unpredictable, easily affected by currency exchange rates and supply and demand factors. The uncertainty over the future of farming means diversification of agricultural businesses can help to sustain existing businesses by providing more predictable revenue streams.
- 3.3 There are also other types of business such as those for tourism, community use and recreation that may benefit from a countryside location and these should be encouraged where it would not be in conflict with other aims in the interest of supporting the rural economy. Local Plan policies need to strike a suitable balance between encouraging rural economies, maintaining and, where possible, improving the sustainability of smaller rural settlements, and conserving the character of the countryside.

#### National policy context

- 3.4 The NPPF (2019) states in paragraph 83 that *“Planning policies and decisions should enable:*
- a) *the sustainable growth and expansion of all types of businesses in rural areas, through conversion of existing buildings and well-designed new buildings;*
  - b) *the development and diversification of agricultural and other land-based rural businesses;*
  - c) *sustainable rural tourism and leisure developments which respect the character of the countryside; and*

- d) *the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship*".

- 3.5 The NPPF does however restrict the scope of both commercial and residential development that may be considered acceptable in principle in rural areas. The NPPF regards the construction of new buildings in the Green Belt as inappropriate with certain exceptions. These exceptions are listed in paragraphs 145<sup>12</sup> and 146<sup>13</sup>.
- 3.6 The exceptions listed in paragraph 145 include the following development:
- a) buildings for agriculture and forestry;
  - b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
  - c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
  - d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
  - e) limited infilling in villages;
  - f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
  - g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
    - not have a greater impact on the openness of the Green Belt than the existing development; or
    - not cause substantial harm to the openness of the Green Belt where the development would contribute to meeting an identified local affordable housing need.
- 3.7 The re-use of existing buildings of "*permanent and substantial construction*" is a further exception under NPPF paragraph 146 (d) as it can be an appropriate way of providing for a rural use which otherwise may have required a new building.
- 3.8 Conversion of barns or other agricultural buildings within the Green Belt to Use Class C3 residential uses is now 'permitted development' under planning legislation<sup>14</sup> subject to prior notification and can therefore be resisted only on certain grounds, including the length of current use of the existing building, the floorspace of the proposed dwellings, and whether the existing building is a listed building or located within a conservation area.

---

<sup>12</sup> Paragraph 145 (a) of the NPPF supersedes policy RE13 of the 2003 Plan in relation to agricultural buildings.

<sup>13</sup> Paragraph 79(a) covers isolated homes in the countryside for rural workers and supersedes Policy RE11 and RE12 of the 2003 Local Plan. Further guidance on rural housing is set out in Planning Practice Guidance.

<sup>14</sup> The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), Schedule 2, Class Q – Agricultural Buildings to Dwelling houses (<http://www.legislation.gov.uk/ukxi/2015/596/contents/made>). See also the exceptions to permitted development listed in Q.1 of Schedule 2.

## Local strategies and evidence

### Relevant policies in Guildford Borough Local Plan 2003 (to be replaced in the new Local Plan)

- Policy RE8: Farm diversification (including farm shops)

### Relevant policies in Guildford borough Local Plan: strategy and sites (LPSS) (2019)

- Policy P2: Green Belt
- Policy P3: Countryside
- Policy E5: Rural Economy

### Relevant Guildford Borough Council evidence documents

- Rural Economic Strategy 2017 – 2022 (Guildford Borough Council, 2017)
- Guildford Borough Economic Strategy 2013 – 2031 (Guildford Borough Council, 2013)
- Employment Land Needs Assessment (Guildford Borough Council, 2017)

## Relevant Objectives from LPSS

**Objective 1:** To deliver sufficient sustainable development that meets all identified needs.

**Objective 2:** To improve opportunities for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities.

**Objective 7:** To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.

**Objective 8:** To maintain and enhance our role as one of the County's key employment locations in both a strategic and local context by providing and protecting a range of employment sites in appropriate locations.

**Objective 10:** Support and expand the economic vitality of our rural areas whilst protecting existing heritage, landscape and character.

## Policy E10: Rural development (including agricultural diversification)

### Issues

- 3.9 Much of the Borough consists of attractive open countryside, interspersed with rural villages, many of which are of historic value and designated as conservation areas. It is important that the countryside is protected from unacceptable development which would harm its intrinsic value and rural character. However, certain forms of development may be desirable or even necessary to support rural life and maintain and enhance the rural economy. A third of the borough's population lives in rural areas, which also account by ward for 25% of all employment in the borough, including several of the Strategic and Locally Significant Employment Sites allocated by the LPSS<sup>15</sup>. These rural businesses span across an extensive range of sectors including finance, ICT, gaming, advanced manufacturing, professional services, healthcare (including research and development), education and tourism; and include small and larger sized businesses. Many of them also directly serve rural communities. It is therefore in the interest of these communities, as well as important for the borough's economy, that rural businesses are supported and enabled where possible to develop and expand<sup>16</sup>.
- 3.10 A development management policy covering rural development should expand on policies P2, P3 and E5 of the Local Plan: Strategy and Sites 2015 – 2034 by clarifying the types of development that the Council would be likely to support in principle in the countryside and setting out appropriate local policy restrictions in relation to such development, which are compliant with national policy.
- 3.11 Paragraph 145 of the NPPF lists the types of new development that the NPPF states are exceptions to the principle of construction of new buildings in the Green Belt as being inappropriate. The exception in paragraph 145(d) (*“Replacement of an existing building, provided the new building is in the same use and not materially larger than the one it replaces”*) can include new commercial as well as residential uses; whilst the test in paragraph 145(b) of whether appropriate facilities in the Green Belt would *“preserve the openness of the Green Belt and... not conflict with the purposes of including land within it”* would preclude most new buildings but there may be certain sites or types of uses where the test of preserving openness could be passed, even in instances where there is no pre-existing use on the site.

---

<sup>15</sup> See Guildford Borough Economic Strategy 2013 – 2031, page 4 ([http://www.guildford.gov.uk/media/15129/Guildford-Borough-Economic-Strategy-2013-2031/pdf/Economic\\_Strategy\\_Final.pdf](http://www.guildford.gov.uk/media/15129/Guildford-Borough-Economic-Strategy-2013-2031/pdf/Economic_Strategy_Final.pdf)) and Guildford Borough Local Plan: Strategy and Sites 2015 – 20134, Policy E5, paragraph 4.4.55.

<sup>16</sup> *Ibid.*

- 3.12 Examples of well-designed development that could fit into the above category and that could support the rural economy might include a sports pavilion or clubhouse, or a new modestly-sized building or enclosure within a farm holding to accommodate recreational facilities such as an animal petting area. A new development management policy could specifically encourage such uses, subject to compliance with other Local Plan policies. The redevelopment or conversion of existing vacant or redundant agricultural buildings in Green Belt areas to small-scale business, community or recreational uses could also be specifically encouraged in the interest of supporting the rural economy.
- 3.13 In rural areas not subject to Green Belt designation, there are fewer national policy restrictions on rural economic development. A policy that seeks to actively encourage and enable appropriate forms of development in principle could therefore help to expand and/or diversify the rural economy by enabling *“the sustainable growth and expansion of all types of businesses in rural areas...”* as advised in paragraph 83 of the NPPF. To meet the requirement of LPSS Policy P3, such development would need to require or justify a countryside/rural location, be in proportion to the site’s scale and setting and not increase physical or visual coalescence between the existing urban area and villages around Ash and Tongham.
- 3.14 Such developments might include the redevelopment or conversion of agricultural buildings to community, recreational or small-scale business uses; or the development of new uses such as farm shops and other farm diversification proposals, tourist accommodation and small-scale rural tourism attractions. Small-scale leisure facilities that respect the character of the countryside may also be appropriate rural uses that a rural development policy could support, subject to passing the sequential and impact tests for main town centre uses in paragraphs 86-90 of the NPPF<sup>17</sup>.
- 3.15 The Council’s preferred approach is to introduce a new development management policy to address the various issues described above and to cover any relevant points from extant 2003 Local Plan policies that currently deal with these issues. This is explained further below:

---

<sup>17</sup> The NPPF sequential test applies for all applications for main town centre uses (as listed in the NPPF glossary entry) except for new buildings, redevelopment or change of use in non-designated rural areas which would result in less than 100 sqm increase in floorspace (the Council’s definition of small-scale in the LPSS) for these uses. The NPPF explains this where it states at paragraph 88: *“The sequential approach should not be applied to applications for small scale rural offices or other small scale development”*. The impact test applies for all applications for main town centre uses of more than 500 sq. m. gross floorspace (the locally set threshold in the LPSS).

## Preferred option for rural development

The preferred option is to support the development of the rural economy by means of a policy that clarifies the types of new buildings or changes of use of buildings and land that the Council would consider acceptable in principle, subject to any proposal falling within the exceptions listed in paragraph 145 (a) to (g) of the NPPF for sites in the Green Belt, or meeting the requirement of policy P3 (1) of the Local Plan: Strategy and Sites<sup>18</sup> for non-Green Belt sites.

### Green Belt

Within the Green Belt, the policy might support the following proposed forms of rural development, provided that any proposal falls within the exceptions listed in paragraphs 145 and 146 of the NPPF:

- 1) New appropriate facilities for small-scale outdoor sport or outdoor recreation, such as a sports pavilion or clubhouse, or a small-scale building within a farm holding to accommodate outdoor recreational facilities such as an animal petting area.
- 2) Conversion of vacant or redundant agricultural buildings to small-scale business, or recreational uses.

### Countryside

Within the area of countryside, as designated on the Policies Map, the policy could support development of the following new uses in principle, provided they respect the area's local character:

- 1) Farm shops (provided they support the farm's agricultural operations and are operated as part of the farm holding)
- 2) Other farm diversification proposals, for example activity centres and arts and craft shops
- 3) tourist accommodation
- 4) small-scale rural tourism attractions
- 5) Small-scale leisure facilities
- 6) Horticultural nurseries and other small-scale business enterprises

New buildings in the countryside should be clustered together where possible to reduce their visual impact on the character of the countryside and any built features should avoid harm to the local environment or residential amenity (particularly through noise).

### Non-agricultural uses within farm holdings

New buildings, or proposed changes of use of existing buildings, within a farm holding that are to be used for non-agricultural uses will be required to be operated as part of the farm holding and support the farm's agricultural operation.

<sup>18</sup> To accord with LPSS Policy P3 (1) they would need to require or justify a countryside/rural location, be in proportion to the site's scale and setting and not increase physical or visual coalescence between the existing urban area and villages around Ash and Tongham.



The Council will require adequate space to be made available within the curtilage of any building within a farm holding proposed for a farm shop or other non-agricultural use to allow for staff and visitor parking without detriment to the visual amenity of the countryside.

If permission is granted for a farm shop, the Council may apply conditions to limit the overall scale of the development and require that any goods for sale that are not produced locally remain ancillary to the sale of local produce.

\*See Definitions.

### **Alternative options for rural development**

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019, as well as the National Planning Policy Framework and Planning Practice Guidance.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

#### **Reasons for selecting the preferred option in light of the alternatives**

Whilst policy RE9 of the 2003 Local Plan was superseded entirely by the NPPF in paragraphs 89, 145, and 146 (d), and by the adopted LPSS (2019) in policies P2, P3, E7, E8, E9 and D1, points 1 and 5 of Policy RE8 were not addressed and remain relevant. It was therefore considered the appropriate option to introduce a new development management policy to address these remaining points of Policy RE8. This option would also enable the introduction of new policy wording to explicitly support particular types of rural development that are compliant with the NPPF.

### **Definitions**

**Countryside:** The use of the term 'countryside' in the subtext of this policy are in reference to the area of countryside as designated on the Policies Map.

#### **Question 4:**

Do you agree with the preferred option to address rural development in Guildford?

Do you have any other comments or suggestions?

## Topic - Horse related development

### Introduction

- 3.16 The keeping of horses and ponies is a popular leisure activity and has also become an additional source of business income to farmers and others in rural areas. Whilst these activities can bring economic benefits to these areas, they can, either individually or cumulatively, adversely affect the countryside's openness and rural character with the introduction of stables, paddocks, fencing, on-site riding facilities and other visual clutter. The keeping of horses can also have other adverse effects such as the erosion of bridleways, reduced pasture quality, and impacts on the amenities of owners and occupants of neighbouring properties. These same concerns apply to commercial equestrian activities, such as riding schools and livery/boarding stables, which may have the potential for even greater adverse impact due to their greater intensity of use and increased traffic generation.
- 3.17 Landscapes with an open character and areas close to existing residential uses may therefore be less likely to be capable of accommodating such development unless it can be designed carefully to avoid such adverse impacts. The implementation of advisory national standards (see 'National policy context' below) on design of stable buildings, fencing, pasture, landscaping and parking that has been achieved in developments in some locations has enabled proposals to better reflect and enhance the character of the area, as well as ensuring the welfare of horses, ponies, donkeys and hybrid breeds. However, Local Plan policies also play an important role in improving the standards of all types of horse-related development.

### National policy context

- 3.18 The National Planning Practice Framework (NPPF) and Planning Practice Guidance (PPG) do not provide any specific guidance on equine-related development, however the Department for Environment, Food and Rural Affairs' (Defra) *Equine Code of Practice for the Welfare of Horses, Ponies, Donkeys and their Hybrids* (December 2017)<sup>19</sup> sets out a comprehensive range of welfare standards aimed at ensuring that equine animals are kept in conditions suitable for them. These provide information on provision of stabling, pasture quality and appropriate minimum amount of space per animal for exercise and grazing.

### Local strategies and evidence

#### Relevant policies in Guildford Borough Local Plan 2003 (to be replaced in the new Local Plan)

- Policy R12: Non-commercial Horse Related Development
- Policy R13: Commercial Horse Related Development

---

<sup>19</sup> Available to download at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/700200/horses-welfare-codes-of-practice-april2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/700200/horses-welfare-codes-of-practice-april2018.pdf).

**Relevant policies in Guildford borough Local Plan: strategy and sites (LPSS) (2019)**

- Policy P2: Green Belt
- Policy E5: Rural Economy

**Relevant supplementary planning guidance**

- N/A

**Relevant Guildford Borough Council evidence documents**

- Rural Economic Strategy 2017 – 2022 (Guildford Borough Council, 2017)
- Guildford Borough Economic Strategy 2013 – 2031 (Guildford Borough Council, 2013)

**Relevant Objectives from LPSS**

- Objective 3:** To ensure that all development is of high-quality design and enables people to live safe, healthy and active lifestyles.
- Objective 4:** To retain the distinct character and separate identities of our settlements.
- Objective 5:** To protect and enhance our heritage assets and improve the quality of our built and natural environment.
- Objective 7:** To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.
- Objective 10:** Support and expand the economic vitality of our rural areas whilst protecting existing heritage, landscape and character.

## Policy E11: Horse related development

### Issues

- 3.19 Horse keeping can exacerbate several problems in the countryside, including the fragmentation of viable agricultural holdings, the erosion of paths and bridleways and the detrimental visual impact of buildings for stabling and hay storage and on-site riding facilities such as jumps and fences. On privately owned land, horse-related developments are particularly liable to cause adverse visual impacts where they are located separate from the curtilage of the dwelling with which they are associated, as such developments are likely to be more visible from public land or other nearby dwellings. There is also a risk that a lack of clear planning control may lead to poorly designed developments which do not meet minimum standards for animal welfare. These impacts can be mitigated by ensuring that welfare standards are met for any new development that requires planning permission and that private stables, loose boxes, hay stores and tack rooms are located within or adjacent, rather than a distance beyond the gardens (or curtilage) of private dwellings, in order to limit development in the open countryside.
- 3.20 Stables and other buildings for horses kept for the enjoyment of the occupants of a dwelling and not for any commercial gain are classed as 'permitted development' and may be erected within a domestic garden without planning permission subject to the same restrictions which apply to outbuildings within domestic gardens<sup>20</sup>. The erection of stables, arenas, associated tack-room and feed-store buildings for horse-keeping (as opposed to grazing) on land beyond a domestic curtilage or on agricultural land, on the other hand, requires planning permission for the change of use of the land and the new building and/or engineering work involved<sup>21</sup>. In these cases where there is a requirement for planning permission, local planning authorities can utilise their Local Plan policies and/or call on relevant national guidance to influence proposed developments.
- 3.21 Whilst the issue of horse-related development is addressed by policies R12 and R13 of the 2003 Local Plan, those policies do not contain any notable detail on the issue. There is also now more up-to-date guidance on the issues in Defra's *Equine Code of Practice for the Welfare of Horses, Ponies, Donkeys and their Hybrids (2017)*, some of which could usefully be incorporated into local policy. Therefore, given the extensive amount of countryside in the district, and the need to balance demand for equestrian facilities with the need to find alternative uses for farmland, a development management policy with criteria addressing the latest guidance on this topic would be of value to guide decision-making.

---

<sup>20</sup> These restrictions are set out in Class E of the Town and Country Planning General Permitted Development Order and can be found in Schedule 2 Part 1 of that document (<http://www.legislation.gov.uk/ukxi/2015/596/schedule/2/made>). Further guidance is also available on the Government's 'Planning Portal' website ([www.planningportal.gov.uk](http://www.planningportal.gov.uk)).

<sup>21</sup> Planning case law makes a distinction between horses that are 'grazing on land' and horses 'kept on land'. A court judgement in 1981 (*Sykes v Secretary of State*) took the view that horses turned out on land are 'grazing', which does not require planning permission, whereas 'keeping horses' on land requires planning permission for change of use. The distinction rests upon factors such as the addition of permanent buildings or structures and/or use of the land to ride, train or other horse related activities which indicate 'keeping' rather than simply 'grazing'.

## Policy approaches to horse-related development

- 3.22 The Council's preferred approach is to develop a policy setting out criteria for permitting new horse-related development for domestic and commercial purposes and indicating where developers will be required or expected to adhere to the design standards in Defra's *Equine Code of Practice for the Welfare of Horses, Ponies, Donkeys and their Hybrids*. The policy should include general requirements for the location, design, scale and layout of horse-related development, and address potential impacts on adjacent landowners and residents of nearby dwellings as well as animal welfare requirements. This is set out in more detail below.

### Preferred option for horse-related development

To have a policy that supports small-scale horse or other equine-related development if:

- 1) adequate land is available for the proper care of the animals, including stabling, grazing and exercise, having regard to the latest Government-published standards; and
- 2) the applicant demonstrates that the proposed development would:
  - a) have no adverse effect on the nature conservation or biodiversity value of the site;
  - b) re-use existing buildings where feasible, or, in the case of a new facility, be satisfactorily integrated with existing buildings;
  - c) be acceptable in terms of impact on landscape character.
  - d) not have a significant detrimental effect on the amenity of neighbouring or nearby properties by reason of noise, smell, overlooking, or other general disturbance

Particular consideration will be given to the cumulative adverse effects of proposals in the vicinity of the proposed site and the wider area.

#### Larger-scale developments

- 3) Proposals for larger-scale equine-related development will be expected to meet the criteria above. In addition, for developments likely to attract large numbers of visitors, a transport assessment will be required to be undertaken to show that there will be no unacceptable impacts on highway safety and that the safety of horses, riders and other road users will not be compromised.

## Alternative options for horse-related development

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019, as well as the National Planning Policy Framework and Planning Practice Guidance.

## Justification for the choice of options and selection of preferred option

### Reasons the alternatives were selected

'No policy' is the only reasonable alternative as no further options were identified.

### Reasons for selecting the preferred option in light of the alternatives

The National Planning Practice Framework (NPPF) and Planning Practice Guidance (PPG) do not provide specific guidance on equine-related development.

Whilst the issue was addressed to some extent by the 2003 Local Plan in policies R12 and R13, those policies do not provide any notable detail regarding horse-related development. Defra's Code of Practice provides additional national guidance on this issue, some of which could usefully be incorporated into local policy. Given the extensive amount of countryside in the district, and the need to balance demand for equestrian facilities with the need to find alternative uses for farmland, the Council therefore considers a development management policy with criteria addressing the latest guidance on this topic would be of value to guide decisions on applications.

## Definitions

**Small-scale:** The assessment of whether a horse-related development is small-scale will be considered as a planning judgement on an individual application basis, as typical benchmarks used elsewhere cannot necessarily be applied in every situation.

### Question 5:

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

Do you have any other comments or suggestions?

## Chapter 4: Protecting

### Biodiversity and the Natural Environment

#### Introduction

##### Biodiversity

- 4.1 Biodiversity (biological diversity) refers to the variety of life on Earth including the different species of animals, plants, and micro-organisms that coexist<sup>22</sup>. In practice, the term is used to refer to the natural world, all plants, animals, other organisms and the ecological relationships between them. Diversity is important to ensure healthy and resilient species communities, habitats and ecosystems, both natural and human-made.
- 4.2 Biodiversity is declining globally at a rate unprecedented in human history, with around one million animal and plant species threatened with extinction<sup>23</sup>. The extinction rate currently may be 100 times higher than that 'normally' experienced over evolutionary time<sup>24</sup>. In the UK, greater than one in seven wildlife species have become extinct or threatened to the point of extinction in the last 40 years. The loss of biodiversity has serious implications for humanity, which depends on a healthy natural environment for provision of resources like food, pharmaceuticals and construction materials and needs a healthy physical environment and climate for general health and wellbeing.
- 4.3 Human-driven land use changes throughout history, including the intensification of agriculture especially in the 20th century, have led to loss and fragmentation of semi-natural habitats nationally. Combined with other pressures, such as development, climate change, pollution in the air and in watercourses, the impact on nature from human activity has been significant. Across the UK generally, the abundance and distribution of species has declined over recent decades with many species experiencing rapid population contractions. The resulting net loss of biodiversity is set to continue; in England, 13% of species are threatened with extinction<sup>25</sup>.
- 4.4 Guildford borough has a wide range of habitats and species, but many of these are threatened or endangered. Guildford is in fact the richest borough in terms of biodiversity in Surrey - a county that as a whole remains comparatively bio-diverse. The borough has several sites comprised of lowland heath which is recognised as an internationally restricted and threatened habitat internationally. The River Wey carries high levels of phosphate and has many reaches that are heavily modified, leading to loss of habitat diversity and the creation of barriers for fish migration<sup>26</sup>. These issues and the presence of further pollutants give rise to poor water quality for a number of tributaries, as well as varied biological quality throughout the catchment. The borough has a large number of sites designated nationally and locally for their nature conservation importance.

---

<sup>22</sup> UN Convention on Biological Diversity.

<sup>23</sup> UN Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services 2019.

<sup>24</sup> The misunderstood sixth mass extinction, Ceballos, G. and Ehrlich, P. (2018).

<sup>25</sup> State of Nature 2019: Summary for England (State of Nature Partnership, 2019).

<sup>26</sup> Defra and the Environment Agency (2009) Thames River Basin Management Plan.

4.5 The Surrey Nature Partnership (SyNP), the local partnership endorsed by the Department of Environment, Food and Rural Affairs (Defra) to coordinate decision-making on biodiversity across Surrey, has produced the report "The State of Surrey's Nature"<sup>27</sup> which provides the following information:

- From a large sample, Surrey has lost an estimated 12 per cent of its species, a far higher number than nationally,
- A further 21 per cent of Surrey species are considered to be in decline and heading towards extinction locally,
- 15 per cent are rare enough to be of concern but with stable populations presently,
- Only 3 per cent of species are considered rare but actually appear to be recovering.

4.6 Species decline and extinction is an international and national problem. Data shows that such declines are further pronounced when the area under scrutiny (such as a county) is reduced, and the situation is probably worse still in the context of Guildford borough.

4.7 Priority should be given to conserving species that are locally rare and in decline, even if the national population is stable. In many cases, pressures on priority habitats are already close to critical levels and small changes can represent tipping points for flora and fauna, or result in increased management costs for priority habitat sites.

### **International and national policy context**

4.8 The UK is a signatory to the Bern Convention on the Conservation of European Wildlife and Natural Habitats, which is a binding international agreement that protects the natural heritage of Europe and some African countries, with a focus on protecting natural habitats and endangered species.

4.9 The continuing impoverishment of biodiversity across the UK is recognised nationally and the commitment to protecting biodiversity and halting the decline is set out in national legislation, policy and strategies:

- The Natural Environment and Rural Communities (NERC) Act 2006 places a statutory duty on public authorities in England to conserve biodiversity when exercising their normal functions, such as policy and decision making,
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (Defra 2011)
- A Green Future: Our 25 Year Plan to Improve the Environment (Defra 2018)
- The NPPF includes measures that require planning decisions and local planning policies to address and reverse the biodiversity decline.

4.10 The NERC Act places a lead role on local planning authorities in addressing biodiversity losses - English LPAs have a statutory duty to show regard for conserving biodiversity in the exercise of all public functions.

---

<sup>27</sup> Available online at: [https://surreynaturepartnership.files.wordpress.com/2014/11/state-of-surreys-nature\\_web.pdf](https://surreynaturepartnership.files.wordpress.com/2014/11/state-of-surreys-nature_web.pdf).



- 4.11 Biodiversity 2020 sets plans to address threats to 'protected' and 'priority' species and to 'priority habitats'. The strategy is due to be updated with new local requirements after the strategy and targets have been reviewed.
- 4.12 The NPPF requires planning policies and decisions to contribute to and enhance the natural environment. Specifically, Local Plans should protect and enhance biodiversity sites, recognise the wider benefits of natural capital and ecosystem services, minimise impacts on and provide measurable net gains for biodiversity, and avoid creating or increasing risk from unacceptable soil, air and water pollution. Plans should also map and safeguard components of habitats and ecological networks and promote the conservation, restoration and enhancement of priority habitats and species.
- 4.13 “Ecosystem services” are the flows of benefits that people gain from the processes that occur within ecosystems. “Natural capital” is the stock of natural ecosystems from which these benefits flow<sup>28</sup>. For example, a forest is a component of natural capital and it provides ecosystem services such as climate regulation, water supply and regulation, timber, energy, habitat for biodiversity, clean air, erosion control, recreation opportunities and many others. The ecosystem services approach values these benefit and allows us to place a monetised, economic value on all the essential services we receive from nature. This means that impacts on biodiversity and ecosystems can be properly quantified and will not be taken for granted, while the risks and opportunities of losing or restoring the natural environment are better understood and factored financially into decision making. Examples of this approach include:
- an estimated 1.4 billion kilogrammes of air pollutants removed by natural vegetation in 2015 saving a potential £1 billion in avoided health costs (Air Quality Expert Group, 2018),
  - an estimated 80,000 tonnes of food produced on UK allotments annually, worth an estimated £114 million (UK natural capital: ecosystem accounts for urban areas, ONS, 2018),
  - 3.2 million hectares of woodland in the UK removed 16.5 million tonnes of carbon dioxide in 2015, valued at £1 billion in terms of services to the economy per annum (UK Natural Capital: interim review and revised 2020 roadmap, ONS, 2018).
- 4.14 Some biodiversity features are protected by law. For example, the Wildlife & Countryside Act 1981 protects the Water vole, Common lizard, Slow-worm, Adder, Grass snake, Roman snail, all bats and all birds’ nests, eggs and young. Some birds, listed on Schedule 1 of the act, receive an extra protection from any form of disturbance during breeding season. Badgers and their setts are protected under the Protection of Badgers Act 1992. Many of these species benefit from extra European protection including the Great crested newt, all species of bat, Common dormouse, Otter, Smooth snake and Sand lizard, while some sites, like those comprising the Thames Basin Heaths are protected by European legislation. This legislation has been transposed into UK law.

---

<sup>28</sup> See online resource at: <https://ecometrica.com/article/biodiversity-ecosystem-services-and-natural-capital-terms-matter>.

- 4.15 Other features do not receive legal protection, but are protected through national planning policy, including ancient woodland and other irreplaceable habitats. Further features do not receive automatic protection from either the law or national planning policy, but can be protected through local planning policy. The Surrey Biodiversity Information Centre provides information about known populations of protected and other locally-present priority species.
- 4.16 Natural England's guidance on Green Infrastructure<sup>29</sup> highlights the multifunctional benefits of green infrastructure, including its role in climate change adaptation. With regards to biodiversity, the dispersal and migration of species to new areas of climatic suitability will be enabled through a connected network of green and blue infrastructure.
- 4.17 The NPPF requires us to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution and wherever possible, help to improve local environmental conditions such as air quality, taking into account relevant information.
- 4.18 Para 181 states that planning policies should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and seek opportunities to improve air quality, such as through traffic and travel management, and green infrastructure provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.

### **Local Context**

- 4.19 Some habitats are protected through local policy. These are Sites of Nature Conservation Importance (SNCI)<sup>30</sup> and Local Nature Reserves (LNR)<sup>31</sup>, for which protection is provided through the Local Plan: Strategy and Sites policy ID4: Green and blue infrastructure. SNCIs are selected by Surrey's Local Sites Partnership and cover many priority habitats.
- 4.20 At the County scale, SyNP coordinates protection and enhancement of the county's natural environment. It is working with Surrey local authorities to set out an approach to conserving and enhancing the biodiversity of the county at a landscape scale. The Natural Capital Investment Plan (NCIP)<sup>32</sup> for Surrey sets out the broad actions required to achieve and maintain healthy natural assets in Surrey over the next 25 years.

---

<sup>29</sup> Natural England (2009) Natural England's Green Infrastructure Guidance (NE176). Available online at: <http://publications.naturalengland.org.uk/publication/35033>

<sup>30</sup> SNCIs are selected by the Surrey Local Sites Partnership. For further information see: [https://surreynaturepartnership.files.wordpress.com/2019/05/snci-policies-procedures-slsip-terms-of-reference\\_surrey-nature-partnership\\_may-2019.pdf](https://surreynaturepartnership.files.wordpress.com/2019/05/snci-policies-procedures-slsip-terms-of-reference_surrey-nature-partnership_may-2019.pdf)

<sup>31</sup> LNRs are designated through national legislation but decisions on designation are taken locally.

<sup>32</sup> SyNP (2018) Natural Capital Investment Plan for Surrey. Available at: <https://surreynaturepartnership.files.wordpress.com/2018/03/natural-capital-investment-plan-for-surrey.pdf>

- 4.21 SyNP has identified a network of Biodiversity Opportunity Areas (BOAs). These are areas where there are concentrations of important biodiversity sites and within which habitat management and creation can be most effective in enhancing habitat connectivity for the benefit of the most threatened priority species. Policy ID4 incorporated the BOAs into policy and includes a map of their boundaries. The SyNP has produced a series of policy statements setting out the priority habitats and species for each BOA in the document 'Biodiversity Opportunity Areas: The basis for realising Surrey's ecological network' (SyNP 2019)<sup>33</sup>.
- 4.22 The Environment Agency is the prime agency responsible for water habitat and has produced the Thames Basin River Management Plan<sup>34</sup> which establishes the ecological baseline for the area, and sets out the necessary action to achieve 'good' ecological status. The Wey Landscape Partnership has produced the draft Wey Catchment Management Plan 2018<sup>35</sup> which aims to protect and improve water quality in rivers and groundwater. High quality watercourses lead to benefits in terms of freshwater biodiversity but are also important socio-economically, through providing safe drinking water, flood protection and recreational benefits.
- 4.23 Guildford Borough Council owns 53 countryside sites covering 800 hectares (2.5 per cent of the borough's area) and manages 32 km of rural road verges on behalf of Surrey County Council. The objectives for the management of these sites include achieving an accessible, high quality and sustainable open space network that contributes to the provision of ecosystem services, and to create a better, bigger and more connected wildlife habitat network through habitat enhancement.

### **Local strategies and evidence**

- The Natural Capital Investment Plan (NCIP) 2018 - Surrey Nature Partnership
- Biodiversity and Planning in Surrey, 2019 – Surrey Nature Partnership
- Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network, 2019 (revised) – Surrey Nature Partnership
- The Thames Basin River Management Plan 2015 – Environment Agency
- The Wey Catchment Implementation Plan 2018 - Wey Landscape Partnership
- Basingstoke Canal Strategy (2014 – 2019)
- Surrey Hills AONB Management Plan 2020-2025 (Surrey Hills AONB Board)
- A Vision for Guildford Borough's Countryside Sites (Guildford Borough Council)
- Guildford Borough Council Air Quality Strategy 2017-2022
- Guildford Borough Council Air Quality Action Plan – Compton Village 2019

---

<sup>33</sup> Available at: [https://surreynaturepartnership.files.wordpress.com/2019/10/boas\\_the-basis-for-realising-surreye28099s-ecological-network\\_synp\\_sept\\_2019.pdf](https://surreynaturepartnership.files.wordpress.com/2019/10/boas_the-basis-for-realising-surreye28099s-ecological-network_synp_sept_2019.pdf)

<sup>34</sup> Environment Agency (2015) Part 1: Thames river basin district river basin management plan. Available online at: <https://www.gov.uk/government/publications/thames-river-basin-district-river-basin-management-plan>.

<sup>35</sup> Wey Landscape Partnership (2018) Draft River Wey Catchment Plan. Available online at: [https://surreynaturepartnership.files.wordpress.com/2018/05/wlp-catchment-plan\\_sert\\_-draft-v3.pdf](https://surreynaturepartnership.files.wordpress.com/2018/05/wlp-catchment-plan_sert_-draft-v3.pdf).

- Guildford Borough Council Air Quality Annual Status Report (ASR) 2018
- Guildford Borough Council (2017) Transport Strategy
- Guildford Surface Water Management Plan (Guildford Borough Council, 2014)
- Ash Surface Water Study (Guildford Borough Council, 2014)
- The River Wey Catchment Plan (2018)
- AECOM, Guildford Borough Council Water Quality Assessment, 2017

**Relevant policies in Guildford Borough Local Plan 2003 (to be replaced in the new Local Plan)**

- Policy NE4 – Species Protection
- Policy NE5 – Development affecting trees, hedges and woodlands
- Policy NE6 – Undesignated Features of nature conservation interest

**Relevant policies in Guildford borough Local Plan: strategy and sites 2019**

- Policy ID4: Green and blue infrastructure
- Policy ID3: Sustainable transport for new developments
- Policy P4: Flooding, flood risk and groundwater protection zones

**Relevant Guildford Borough Council supplementary planning guidance**

- None

**Relevant Objectives from LPSS**

- Objective 3:** To ensure that all development is of high-quality design and enables people to live safe, healthy and active lifestyles.
- Objective 5:** To protect and enhance our heritage assets and improve the quality of our built and natural environment.
- Objective 6:** To protect those areas designated as Thames Basin Heaths Special Protection Area, Special Areas of Conservation, Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty for their biodiversity and landscape characteristics.
- Objective 7:** To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.

## Topic - Biodiversity in New Developments

### Issues

- 4.24 Historically, biodiversity has been a consideration in the planning system alongside a number of other matters, but has not often been seen as a priority. Planning policy has focused primarily on protecting important designated habitats and species. This is changing; it is increasingly apparent that the UK's biodiversity decline is so severe that heightened efforts to bring about recovery (as opposed to merely arresting loss) are essential. National planning policy is asking new development to play a role in reversing the decline by providing measurable biodiversity net gains and it has been proposed that this will become a mandatory requirement through legislation (see policy P7). In order to achieve the national objectives and net gains called for by the NPPF, and to address the severe local biodiversity decline in Surrey, the Council's view is that biodiversity should become a priority in development as a general principle, and that open spaces, new buildings and development design should deliver biodiversity benefits throughout.
- 4.25 The principle of embedding biodiversity measures in new development is set out in the NPPF at paragraph 175d where it states "...opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity".
- 4.26 This change in approach should not compromise the continued protection of the habitats and species designated nationally and locally for their rarity or importance.

### Landscape and planting schemes

- 4.27 The majority of development proposals in our borough include an amount of green open space that provide recreation opportunities and visual amenity and can serve a functional purpose such as flood management or privacy screening. Often, development proposals are accompanied by information setting out what will be planted and how it will be managed. In many cases, these open spaces should be able to provide biodiversity value without compromising the primary purpose of the space by incorporating species and management techniques that provide the greatest biodiversity benefit.
- 4.28 Landscaping schemes should take into account the potential for the development site to provide better connectivity between areas of priority and other habitats in order to support the aim of creating bigger and better-connected habitats.
- 4.29 The principle of re-wilding has become more common, which is the reinstatement of natural dynamic processes by allowing nature to colonise open spaces that are then subject to only light management. Re-wilding can provide a rich mixture of habitats, often at the micro-scale, that support a diverse range of plants and animals. Examples of this approach include providing areas of lightly-managed wildflower grassland instead of intensively managed amenity grass. This can result in reduced management costs.

- 4.30 Layout can affect the biodiversity value of a site, particularly where trees are included. Grouping trees together to create connected canopies provides greater biodiversity benefit than the same number of trees planted separately; the benefits of trees to biodiversity should be measured in terms of canopy area rather than simply the number of trees. Grouped trees should be adequately spaced at maturity and it is also necessary to balance the wider benefits of more even distribution of trees throughout new greenspaces.
- 4.31 New development usually cannot provide new canopy cover from the outset. However, where new trees are planted the aim should be to provide a canopy as the trees mature. The Committee on Climate Change recently set a target for forest cover to increase nationally from 13 to 17 per cent<sup>36</sup> as a carbon sequestration measure to mitigate climate change. The SyNP has issued guidance on tree planting locally for climate change mitigation, in order to help manage public expectations on the issue and to ensure that the proposed tree cover does not in fact compromise existing or other potential biodiversity conservation interests<sup>37</sup>.
- 4.32 There is mounting evidence that natural spaces, and particularly areas of canopy cover, are beneficial for mental and physical health, so the benefits of increasing canopy cover extend beyond the natural environment. Urban tree canopy cover on its own has been indirectly linked to reduction in obesity, diabetes, high blood pressure and asthma<sup>38</sup>.
- 4.33 Careful choice of species can increase the biodiversity value of a particular space. Wildflowers and trees can occupy the same space, with wildflowers flowering early in the year before trees have budburst and shaded the land, and by planting native species the widest variety of wildlife species present in the UK will be supported.
- 4.34 Planting schemes should be resilient and designed to last for the life of the development so that the biodiversity benefits are retained in the long term. The climate is changing, and planting schemes will need to prepare for the shift toward hotter, drier summers and warmer, wetter winters. Guidance on selecting species for resilience is available from a number of reputable bodies<sup>39</sup>.

---

<sup>36</sup> Committee on Climate Change (CCC) (2019) Net Zero – The UK’s contribution to stopping global warming. Available online at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>.

<sup>37</sup> Tree planting for climate change mitigation in Surrey: a Surrey Nature Partnership Position Statement (SyNP 2020).

<sup>38</sup> Multiple health benefits of urban tree canopy: The mounting evidence for a green prescription (Ulmer et al., 2014) <https://doi.org/10.1016/j.healthplace.2016.08.011>.

<sup>39</sup> For example, Tree Species Selection for Green Infrastructure: A Guide for Specifiers from the Trees and Design Action Group. Available online at: <http://www.tdag.org.uk/species-selection-for-green-infrastructure.html>.

- 4.35 Certain plant species in the UK are subject to attack by disease:
- Dutch elm disease previously wiped out a large number of elm trees across the UK and new infections break out periodically,
  - ash dieback is threatening to kill up to 95% of ash trees nationally,
  - oak processionary moth (OPM) could result in a fall in the population of oak trees<sup>40</sup>, and
  - some diseases, such as *Xylella Fastidiosa*, do not currently affect the UK but are expected to in the future.
- 4.36 When there is an outbreak of disease, some individuals or strains of the affected species can be resistant. Some tree providers are now able to provide disease resistant specimens of Elm trees and this may be the case for other diseases and species in the future. Where these are available, planting schemes can improve resilience by introducing disease resistant strains both to ensure the planting is resistant to attack and to help seed local tree populations with resistant strains.
- 4.37 The risk from future disease outbreaks can be reduced by planting a mix of species so that if one species is attacked the majority of trees will not be affected. As many of these tree diseases were originally introduced through imports from abroad, there are now legal restrictions on the sourcing of nursery stock to improve our future 'bio-security'. Resilience can be improved further by planting trees that are of different ages or species with different lifespans, so the trees do not reach the end of their lives at the same time.
- 4.38 Diseases such as OPM can present a health risk to humans and animals. Where OPM is identified, the Forestry Commission may take action to eradicate the outbreak, and public health legislation requires the trees to be made safe where there is risk to the public.

### **Construction**

- 4.39 Many species (for example, swifts, bats and house martins) have adapted to live on or within built structures. However, modern construction techniques and the increasing emphasis on energy efficiency has resulted in the loss of many of the features and gaps in the building structure that these species exploit. There is an opportunity to compensate for this through wildlife-friendly design, integrating habitats into our built structures: for example, rugged nesting boxes can be integrated into the walls of buildings in appropriate locations. By integrating habitat measures into the structure, rather than attaching them to walls and roofs, the measures are more likely to be robust and permanent. Green (and 'brown') roofs and walls may also provide opportunities for nature on built structures.

### **Site design**

- 4.40 At the wider scale, developments can support nature by employing a design that provides new habitat, connects existing habitat and avoids fragmentation, retains and extends tree canopies, creates additional connected areas of new canopy and green space, and avoids barriers to wildlife movements.

---

<sup>40</sup> OPM is not generally fatal but can result in defoliation which, when coinciding with other negative impacts such as drought, can lead to the death of trees. See: <https://www.guildford.gov.uk/article/17162/Oak-processionary-moth>.

- 4.41 Water features are often used to manage surface water (through Sustainable Drainage Schemes, or SuDS) and can help with climate change adaptation by managing heavy rain events, as well as by helping to cool the urban environment. They can also provide biodiversity benefits if they are well designed and include natural materials and planting.
- 4.42 Areas of green space provided for recreation may still need to be mown amenity grassland, which has limited biodiversity value, but the margins can be planted to heighten biodiversity value and visual amenity for the users of the open space. Sometimes, barriers are necessary within a development site (for example, to prevent access to steep sided SuDS), where natural barriers can be created through dense planting rather than through fencing or concrete.
- 4.43 Many greenfield development sites are highest in biodiversity at their margins where there are often hedgerows and areas of woodland or other habitats that may be subject to less disturbance. Habitat fragmentation can be reduced by connecting up hedgerows, providing stepping-stones between existing woodland areas and other habitats, and providing green corridors of more varied, mosaic habitats to allow wildlife to move through the site.
- 4.44 Many watercourses are important wildlife corridors, and these should be retained by providing an appropriate buffer of natural or semi-natural habitat at each side of the watercourse.
- 4.45 Open spaces and private gardens within developments can support wildlife by providing foraging and nesting opportunities, but only if these spaces can be accessed. Therefore, it is important that the built environment is permeable for wildlife by incorporating wildlife corridors and gaps in barriers such as fences and walls. These appear to be especially beneficial to the rapidly-declining Hedgehog. Garden ponds can be important habitats for amphibians, and it is important that residents can move between ponds. Culverts under paths and roads can provide a means for amphibians and reptiles and small mammals to safely cross-roads.
- 4.46 Where settlements do provide habitats, it is helpful that the local community is engaged with this objective and develops a sense of ownership so that the habitats are respected and maintained in the long term. Education measures such as interpretation boards can provide information about important local ecological features and habitats for this purpose.
- 4.47 The installation of external lighting or roof-lights often does not need planning permission and so cannot be directly controlled by planning policy. However, schemes can be designed to minimise light spillage, especially onto important habitats. Some larger developments are accompanied by a lighting strategy, in which case there are means to influence external lighting through policy.

#### **Sensitive habitats**

- 4.48 Development sites may sometimes contain or be adjacent to sensitive habitats that are detrimentally impacted either directly or through recreational access. Such habitats can be protected by providing buffers and, where necessary, natural barriers between the development and the habitat.



### **Invasive species**

- 4.49 About 10-15% of non-native species established in Great Britain cause significant adverse impacts<sup>41</sup>. Invasive species can disrupt aquatic and terrestrial ecosystems and habitats, out-compete or prey on native species and some invasive plants can damage structures, including homes. In order to safeguard biodiversity, it is important that the spread of invasive species is prevented.
- 4.50 Some invasive species, such as Japanese knotweed and Himalayan balsam, are already established in Surrey and may be present on development sites. Where invasive species are present, these should be eradicated or, where this is not possible, controlled. UK legislation covers the control of invasive species so this is not addressed through the proposed policies, but site design should take into account the need to prevent invasive species from spreading when seeking to improve habitat connectivity.

### **National, regional and local strategies, designations and guidance**

- 4.51 The NPPF states:
- “To protect and enhance biodiversity and geodiversity, plans should:*
- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
  - b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*
- 4.52 Policy ID4 identifies and maps Surrey’s BOAs to set the strategic approach to biodiversity recovery across the borough and identifies a network of nationally and locally protected designated sites<sup>42</sup> that are important for biodiversity, form components of ecological networks and contain priority habitats and species. The supporting text for policy ID4 at paragraph 4.6.48 states that development within BOAs should draw on the BOA policy statements. However, support for BOAs can be strengthened by including references to the policy statements directly in planning policy. More information about the BOAs can be found in Biodiversity Opportunity Areas: the basis for realising Surrey’s ecological network (Surrey Nature Partnership, 2015)<sup>43</sup>.

---

<sup>41</sup> Great Britain Non-native species strategy (Non-Native Species Secretariat, 2015). Available online at: <http://www.nonnativespecies.org/index.cfm?sectionid=55>.

<sup>42</sup> Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR), Sites of Nature Conservation Interest (SNCI).

<sup>43</sup> Available online at: <https://surreynaturepartnership.org.uk/our-work/>.

- 4.53 The BOAs are a strategic, landscape scale approach to biodiversity and should form the overarching framework for biodiversity protection and enhancement. They are also where any off-site biodiversity enhancements should preferably be located in order to best benefit the recovery of Surrey's nature. However, the biodiversity measures that deliver the best outcomes may not always be the same across the whole of the BOA. In particular, individual sites will differ in character e.g. wetter or drier, be sunnier or more shaded and with differing soil qualities or resident species. Therefore their suitability will vary in terms of the most appropriate types of habitat for restoration and creation, so it is necessary to take factors other than the policy statements into account when selecting biodiversity enhancements.
- 4.54 There are strategies and information available that can guide development to best value biodiversity measures within the framework of the BOAs. It is worth noting that some parts of the borough are not covered by a BOA and these documents will be particularly helpful in those areas. Sources of strategy and information include:
- Future Local Nature Recovery Strategies.
  - B-lines – an emerging national strategy setting out a national network of “insect pathways” within which wildflower rich habitats will be restored.
  - Sites identified as containing priority species or habitats by the Surrey Biodiversity Information Centre.
  - Other designations that may help guide planting schemes in order to address local issues (e.g. Air Quality Management Areas).
  - Biodiversity policies and strategies in neighbourhood plans.
- 4.55 The Council will produce a Green and Blue Infrastructure Supplementary Planning Document (the SPD) that sets out relevant strategies and other information sources that should be considered when designing sites and planting schemes, with maps where possible. Additionally, there is a large amount of guidance available on how best to design sites and planting schemes to support biodiversity. This guidance will be signposted in the SPD.
- 4.56 The area of biodiversity within development is moving rapidly and, as SPDs are more nimble than policy (policies can only be adopted through the lengthy Local Plan process), it is preferable to issue information about biodiversity strategies and best practice in an SPD so that it can be updated more easily and frequently.

## Policy P6: Biodiversity in New Developments

- 4.57 The Council's preferred approach is to include a policy that sets out that biodiversity should be prioritised in development and that opportunities should be taken to maximise biodiversity gains while existing biodiversity features are retained. This is set out below.

### Preferred option for biodiversity in new developments

The aim of this policy is to maximise biodiversity gains in all new developments, (including those exempt from biodiversity net gains - see policy P7), by having a policy that:

- 1) Requires new developments to prioritise biodiversity in their proposals as a general principle.
- 2) Requires developments within or adjacent to a BOA to support the achievement of the objectives of the BOA as set out in the relevant BOA Policy Statement<sup>44</sup> and requires them to protect the designated and priority habitats and species in the BOA and improve habitat connectivity across the BOA.
- 3) Expects proposals to be guided by other national, regional and local biodiversity strategies. The Green and Blue Infrastructure SPD will signpost and map the relevant strategies to help inform planning proposals.

#### Planting schemes and landscaping

- 4) Requires proposals to maximise biodiversity gain in planting and landscaping schemes by choosing species, habitats and management regimes that provide best biodiversity benefit as set out in BOA policy statements and other strategies.
- 5) Tree canopies are expected to be retained and new tree planting is expected to focus on the creation of new connected tree canopies or the extension of existing canopies. Tree planting schemes should provide resilience in terms of climate, disease and ageing, planting large species with long lifespans where opportunities arise. It is expected that UK sourced native species will be used, unless imported strains would offer greater resilience.

#### Measures on building structures

- 6) Requires schemes to include features in or on building structures that support wildlife wherever possible, including integrated nesting boxes and green roofs and walls that will last for the lifetime of the development and cater for appropriate species and habitats.

<sup>44</sup> SyNP (2019) Biodiversity Working Group. [Online]. Available online at <https://surreynaturepartnership.org.uk/our-work/>.

### **Site design**

- 7) Expects schemes to take opportunities to create new areas of habitat and provide appropriate links between existing habitats, avoiding and reversing fragmentation and species isolation. Built features are expected to be permeable for wildlife. Where invasive species are present, site design should not facilitate their spread.
- 8) Expects major schemes to include measures that encourage a sense of community ownership of green spaces.

### **Sites that include or are adjacent to sensitive habitats**

- 9) Where sites contain or are adjacent to sensitive habitats, appropriate buffers and, where necessary, barriers should 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 should take account of the potential impacts on wildlife.
- 10) Development that contains or is adjacent to a watercourse should retain or provide an appropriate buffer between built development (including parking areas, private gardens and landscaping) and the watercourse, composed of natural or semi-natural habitat.

## **Alternative options for biodiversity in new developments**

To not have a specific policy covering this issue but to consider planning applications against:

- 1) Other relevant policies in the Local Plan Strategy and Sites 2019, particularly policy ID4 which contains the strategic requirement to deliver biodiversity net gains in line with the Surrey Nature Partnership's Biodiversity Opportunity Areas,
- 2) Policy P7, which requires developments to deliver net gains and sets a methodology for calculating it, but does not provide detail on how biodiversity can be supported on development sites,
- 3) The future Green and Blue Infrastructure Supplementary Planning Document, and
- 4) Guidance in the National Planning Policy Framework and Planning Practice Guidance and the emerging national mandatory requirement for biodiversity net gains.

## **Justification for the choice of options and selection of preferred option**

### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

### **Reasons for selecting the preferred option in light of the alternatives**

The national approach to biodiversity changed with the update to the NPPF in 2018 and biodiversity has been given elevated prominence. This, combined with the national focus on biodiversity, means that policy is needed to place a higher priority on biodiversity in development.

Whilst biodiversity could be prioritised through policy P7, which mandates biodiversity net gains on all qualifying developments, and policy ID4 includes a strategic approach to biodiversity, neither of these policies provide enough detail to adequately shape development so that it preserves and enhances biodiversity.

### **Question 6:**

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

Do you have any other comments or suggestions?

## Topic - Biodiversity net gain

### Issues

- 4.58 The Government recognises the severe biodiversity depletion nationally and has set the objective of reversing the decline. The NPPF since 2012 has incorporated the principle of biodiversity net gain (BNG) achieved through development, meaning that developments must fully mitigate any loss of biodiversity but then go further to provide a gain, leaving the environment in a better state than before the development.
- 4.59 Policy ID4: Green and Blue Infrastructure of the LPSS, developed under the NPPF 2012, incorporates the “aim” of providing BNG in new developments. In 2018 the NPPF was updated to introduce more comprehensive and precise requirements; while the NPPF 2012 stated that the planning system (not plans) should provide BNG “where possible”, the 2018 NPPF changed this to ‘plans should provide net gains for biodiversity (paragraph 170) and “plans should... identify and pursue opportunities for securing measurable net gains for biodiversity” (paragraph 174). In summary, the requirement for delivery of BNG has been shifted from the planning system as a whole to plans and policies specifically, is no longer caveated with “where possible” and the gain now has to be measurable.
- 4.60 In December 2018, the Government launched a consultation on proposals to introduce mandatory requirements for developments in England to deliver a minimum BNG. The government subsequently announced that it would take the proposals forward and incorporate them into the Environment Bill. While, the passage of the bill ended with the dissolution of parliament in November 2019, the new government in the Queen’s Speech of 19 December stated that it would continue with the bill. Once this is signed into law, all developments, except some exempted developments, will have to achieve BNG measured using Defra’s Biodiversity Metric 2.0 (‘the metric’).
- 4.61 The metric works by placing a value on different habitats based on their distinctiveness, area, condition and contribution to an ecological network, and in doing so, allows the biodiversity value (expressed as ‘biodiversity units’) before and after a development takes place to be measured. In this way, the level of biodiversity gain or loss can be clearly seen by comparing the two values. At time of writing, Defra is consulting on the metric methodology (until February 2020).
- 4.62 Under the national approach, developers can create a BNG by improving the extent, distinctiveness or condition of habitats on site, especially where these have strategic significance. If the required BNG cannot be achieved on-site through avoidance of harm and on-site enhancement, the national approach allows for a last resort option of habitat works in a local site beyond the development (as an off-site ‘offset’), delivered either directly by the developer or by paying into a third party’s habitat enhancement project. In the event that suitable local (county) or regional projects are unavailable, nationally strategic habitats that can be invested in instead.

- 4.63 The current situation is:
- the NPPF requires plans and policies to deliver measurable BNG,
  - There is now an emerging nationally described approach for measuring gain: the Defra Metric 2.0.
  - Local Plan policy ID4 currently supports the strategic aim of delivering BNG but does not provide any further clarification or set out a method by which gains should be measured.
- 4.64 In order to comply with the NPPF the Local Plan: development management policies document should include a policy that seeks measurable BNG from new developments. Given the emergence of a national approach based around the Defra metric, the best way to do this is through a policy that adopts the same methodology as this will likely provide consistency with other local authorities and an approach that developers will become familiar with. Adopting a methodology means that planning decision makers will also become familiar with submitted information, leading to a smoother planning process.
- 4.65 With the end of the Environment Bill, there can be no certainty that the national approach will be put into place. However, if the bill does put into place a national mandatory minimum BNG standard and approach, it is important that the Local Plan BNG policy is compatible with it.
- 4.66 BNG may be achieved on-site, but, where this is not possible, off-site measures can also be used through the funding of habitat creation and/or restoration on selected sites. The government's BNG consultation document agreed with the established best practice in the mitigation hierarchy, which states that avoidance of harm to biodiversity should be the first step, minimisation of harm as the second step, rehabilitation or restoration following impacts from development as the third step and, finally, off-site offsetting (compensation) as the final step. The Council agrees with this approach.
- 4.67 In July 2019, the government<sup>45</sup> set out the following details on what the proposed future national approach to BNG would look like:
- Qualifying developments would have to achieve BNG of at least 10 per cent, with gains secured for 30 years.
  - There would be a new system of environmental spatial mapping to inform BNG baselines.
  - There would be a new framework of 'Local Nature Recovery Strategies' nationally which would:
    - identify biodiversity priorities and opportunities for protecting, recovering or enhancing biodiversity,
    - set the biodiversity priorities for the strategy area, and
    - map existing nature assets including protected sites and wildlife-rich habitats.

---

<sup>45</sup> Defra (2019) Net gain Summary of responses and government response July 2019. Available online at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/819823/net-gain-consult-sum-resp.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf).

- Developers would be required to draw up ‘biodiversity gain plans’ as part of their planning proposals.
- There would be a publicly available “habitat register” of compensatory habitat sites where offsetting funds can be spent.
- Where off-site biodiversity compensation measures are used, the land would be secured for conservation through a new “Conservation Covenant”.
- The mandatory requirement would not apply to the following developments:
  - national infrastructure projects,
  - sites with no biodiversity value (e.g. sites covered wholly by sealed surfaces)
  - previously developed (brownfield) sites that don’t contain protected or priority habitats or face genuine viability difficulties, and
  - permitted development and extensions.
- minor residential sites for fewer than 10 units may be subject to longer transition arrangements or a lower BNG requirement, as well as a simplified process for calculating BNG, to be set out at a future date. Defra is currently producing a simplified metric for sites subject to the simplified process.

- 4.68 Mandatory BNG was proposed to enter into force two years after the Environment Bill came into force, with an ambition in the longer term to embed wider environmental net gain principles in the planning system.
- 4.69 The government has already published updated National Planning Practice Guidance<sup>46</sup> on the natural environment that states BNG may include creating new habitats, enhancing existing habitats, providing green roofs, green walls, street trees or sustainable drainage systems.
- 4.70 In its impact assessment<sup>47</sup> (annex 3), the government explains that 10 per cent was selected as the preferred level of net gain because “a level of net gain at, or ideally above, 10% is necessary to give reasonable confidence in halting development’s role in biodiversity loss” and that this level “is the most achievable level of net gain that the department could confidently expect to deliver genuine net gain, or at least no net loss, for biodiversity”. The impact assessment explains that confidence of achieving BNG from development in general increases as the percentage increases and that the 10 per cent level represents a trade-off between certainty and costs.
- 4.71 Regarding costs, the report sets out the expectation that 90% of the costs will be passed through to land value and will not impact developers. As a result, the central estimate of costs impacts on developers when achieving a 10 per cent BNG are expected to be (2017 prices):
- 0.1 per cent of build costs on brownfield sites (which equates to £207 per house for residential developments)

---

<sup>46</sup> HM Government (2019) Guidance Natural environment. Available online at: <https://www.gov.uk/guidance/natural-environment>.

<sup>47</sup> Defra (2019) Biodiversity net gain and local nature recovery strategies Impact Assessment (Final). Available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/839610/net-gain-ia.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf)



- 0.7 per cent of build costs on greenfield sites (which equates to £948 per house for residential developments)
  - 0.9 per cent of build costs for industrial development
  - 0.7/0.8 per cent of build costs for commercial development (edge of city centre/out of town business park)
- 4.72 Based on the expected costs, the report concludes that “net gain delivery costs are likely to be low as a proportion of key variables such as build costs and land prices” and that “it is unlikely to lead to a significant increase on existing average developer contributions.”
- 4.73 The impact assessment indicates that there cannot be full certainty that genuine BNG will be achieved (rather than no net loss) if the minimum gain is set at 10 per cent and that adopting a higher percentage would increase confidence in the outcome. It states that increasing the BNG to 20 per cent would result in an uplift on costs of 19 per cent, which would equate to an additional £39 per new house on a brownfield site and £180 per new house on a greenfield site based on the central estimates.
- 4.74 Surrey has lost significantly more of its biodiversity than the country as a whole, partly because it has suffered a particularly high degree of habitat loss and fragmentation. As a result, and because there is uncertainty around the achievement of BNG if the target minimum is 10 per cent, the Council’s view is that the net gain level in Guildford borough should be higher and has chosen 20 per cent because this level has been tested through the government’s impact assessment and found to have a limited impact on costs. With a BNG of 20 per cent there will be greater certainty that the Local Plan is consistent with the NPPF where it calls for measurable net gains.
- 4.75 The Council agrees with the government proposal to exempt previously developed land from BNG, unless the site contains high biodiversity value (developments can become rich in biodiversity when they are abandoned for a prolonged period – e.g. hosting diverse invertebrate assemblages, or bats roosting in derelict buildings). Exempting previously developed land will help to steer development away from greenfield sites and onto previously developed sites, delivering a wider sustainability benefit.
- 4.76 The government has stated it will consider exempting self-build sites. The Council does not agree with this as there is no clear justification; self-build sites are already exempt from the Community Infrastructure Levy (CIL) and as a result must be considered to have excellent viability and there is no reason why self-build homes would be considered to have a lower biodiversity impact than market homes. The severe biodiversity decline in Surrey means that such an exemption would be unreasonable.
- 4.77 The Council agrees that minor developments should be subject to a simplified process. It is assumed that the simplified metric will be released while the Development Management Policies plan progresses. If it is not, the Council will include a simplified requirement in a future SPD.
- 4.78 Where sites are exempt from the minimum BNG requirement, this does not mean that those sites should not still aim to maximise biodiversity enhancements to provide as much gain as possible, or at the very least avoid a net biodiversity loss, and Policy P6: Biodiversity in New Development would still apply to BNG exempt developments.

## Policy P7: Biodiversity net gain

4.79 The Council's preferred approach is to have a policy that requires most developments to deliver a measurable BNG. This is set out below.

### Preferred option for biodiversity net gain

The aim is to provide clarity and detail for the requirement for developments to aim to achieve biodiversity net gain set out in policy ID4 through a policy that:

- 1) Clarifies that net gain means a minimum gain of 20 per cent. Major developments are required to follow Defra's net gain calculation methodology 'Defra Biodiversity Metric 2.0' and submit a completed spreadsheet with the planning application. Minor developments are required to follow the simplified version of the metric.
- 2) Clarifies that biodiversity net gain is required on all sites except previously developed sites, unless the previously developed sites support at least one protected or priority species population or habitat, or an assemblage of species with an otherwise demonstrably high biodiversity value<sup>48</sup>.
- 3) Clarifies that proposals for net gain should be delivered in a manner that is consistent with policies P6 and ID4 so that measures are focused on local priorities and will provide best value.
- 4) Ensures development follows the mitigation hierarchy by:
  - a) Avoiding impacts on biodiversity as far as possible.
  - b) Where an impact cannot be avoided, the impact is minimised as far as possible.
  - c) Where habitats are adversely impacted, they are restored or rehabilitated.
  - d) Where impacted habitats cannot be wholly restored or rehabilitated, compensation measures are used, including off-site provision in the locality of the development line with the emerging national approach.
- 5) Requires new habitats delivered under biodiversity net gains to be secured and maintained for at least 30 years.
- 6) Where the applicant is unable to provide the gains on-site or off-site, the Council will seek a financial contribution to fund habitat measures if suitable land is available.
- 7) Supports applications for change of use in order to create biodiversity sites in appropriate locations, including biodiversity offsetting sites and sites within Local Nature Recovery Strategies.

<sup>48</sup> For example, identified through Natural England's Species Status project. See <http://publications.naturalengland.org.uk/category/4707656804597760> and <http://archive.jncc.gov.uk/default.aspx?page=3352>).

## Alternative options for biodiversity net gain

- 1) To not have a policy on BNG and instead rely on the proposed national mandatory approach.
- 2) To adopt the proposed BNG policy, but with BNG set at 10 per cent.

## Justification for the choice of options and selection of preferred option

### Reasons the alternatives were selected

Evidence is available from Defra that shows that a BNG policy set at 10 or 20 per cent can be viable (subject to full plan viability testing).

The only other reasonable alternative is to not have a BNG policy.

### Reasons for selecting the preferred option in light of the alternatives

It is not considered a reasonable option to not have a specific policy covering measurable BNG as this would not be consistent with NPPF requirements for local plans.

Adopting a BNG of 20 per cent is considered more reasonable than 10 per cent. At 10 per cent there is greater uncertainty over whether BNG will be achieved overall. The biodiversity decline is more serious in Surrey than nationally and, based on current evidence, the cost of increasing the BNG level from 10 to 20 per cent does not appear to be prohibitive.

Adoption of the standard is subject to full plan viability testing.

### Question 7:

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

Do you have any other comments or suggestions?

## Topic - Woodland, trees, hedgerows and irreplaceable habitats

### Issues

4.80 Surrey is England's most wooded county and Guildford has a density of trees higher than the national average. Our trees and woodlands are under increasing threat from climate change, changes in land use and tree pests and diseases. In the last 25 years nationally there has been a 76% loss of small woodlands of less than two hectares, and today an estimated 6 million ash trees within the county are 'at risk' from ash dieback. Surrey County Council has an ambition to plant 1.2 million trees, one for each member of the population.

### Irreplaceable habitats

4.81 Irreplaceable habitats are defined in the NPPF glossary as "habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees...". However, the NPPF doesn't contain an exhaustive list of habitats that should be considered irreplaceable. Other habitats that meet the definition that are present in Surrey include ancient hedgerows, ancient wood pasture, wet heathland and bogs, unimproved chalk grassland, historic parkland and ancient and veteran trees. The SyNP has issued guidance on the identification of irreplaceable habitats specific to the Surrey context<sup>49</sup>.

4.82 The NPPF protects irreplaceable habitats as follows: "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists" (NPPF 175c). National policy includes an approach to securing biodiversity net gain (this approach is included in this plan: see policy P7) that includes off-site compensation measures.

4.83 It is important that off-site compensation measures do not form part of an assessment to determine whether the "wholly exceptional reasons" for a development proposal outweigh the loss as offsetting cannot replace irreplaceable habitats. However, this does not mean that if a development that is detrimental to irreplaceable habitats goes ahead, then compensation measures should not be sought as the loss must still be compensated (whereby a biodiversity net gain is achieved) as far as this is possible. There is an opportunity to clarify this point in policy.

### Ancient woodland

4.84 Around four per cent of Surrey's woodland is ancient woodland. Ancient woodlands are areas that have been wooded continuously since 1600 in a relatively undisturbed state and they possess a unique and complex ecology based on a low-nutrient ecosystem driven significantly by a vast and interconnected sub-surface network of fungi and bacteria. It includes Ancient Semi-Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). Ancient woodland is important for its wildlife, soils and its cultural, historical, landscape and recreational value.

---

<sup>49</sup> Irreplaceable habitats guidance for Surrey (SNP 2020)

- 4.85 Surrey's Revised Ancient Woodland Inventory (2011) provides a well-documented and consistent approach to establish whether land is ancient woodland. Natural England and the Forestry Commission will sometimes provide bespoke advice on whether woodland qualifies as ancient and have produced standing advice<sup>50</sup> for planning authorities which notes: "'Wooded continuously' does not mean there's been a continuous tree cover across the whole site. Not all trees in the woodland have to be old. Open space, both temporary and permanent, is an important component of ancient woodlands.". The standing advice includes an assessment guide which can be completed by those with suitable specialist knowledge of woodland ecology in order to determine whether a woodland is ancient.
- 4.86 PAWS are areas of ancient woodland (or within ancient woodland) that have been felled and replanted, often with commercial stands of timber, such as conifers, so they may not appear to be an irreplaceable habitat. However, much of the value of ancient woodland lies in the soils and many remnants of the ancient habitat remain. PAWS can be restored to ancient woodland and as a result should also be considered irreplaceable.
- 4.87 Development can affect ancient woodland through direct loss and also through changes to drainage and damage to root systems. Development can also have impacts on the ecosystem of an ancient woodland through pollution, recreation pressure, fly-tipping, and changes to noise and lighting that can affect wildlife.

#### **Ancient and veteran trees**

- 4.88 Ancient or veteran trees are defined in the NPPF glossary as "A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage." A veteran tree does not have to be very old, but could still have decay features such as branch death and hollowing. These features contribute to its biodiversity, cultural and heritage value. Ancient and veteran trees can be solitary trees but can also be found in groups within ancient wood pastures, historic parkland, hedgerows, orchards, parks and other places.
- 4.89 The UK is rich in veteran trees and supports more than many other European countries. Veteran trees are particularly important for the invertebrate communities they support, as well as providing good roosting habitat for bats and nesting sites for birds. Old trees are also likely to support a rich variety of lichens and mosses.
- 4.90 The Council has experienced problems with encroachment into woodland in the past. Where houses back on to woodland, they can sometimes be regarded as an extension of the private curtilage and cleared for access or used for disposal of garden waste, activities that can be harmful to woodland ecology. Therefore, it is important that areas of ancient woodland are protected by an appropriate buffer, and that the border between private space and public ancient woodland is clearly delineated, for example by running a physical feature such as a path, road or ditch between the built development and the woodland.

---

<sup>50</sup> Available online at: <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>.

- 4.91 Ancient and veteran trees are protected from harm by national planning policy and where they are subject to Tree Protection Orders (TPO) they receive statutory protection against any works (whether on the tree or otherwise) that would cause harm. TPOs are generally only applied where significant trees are known to be under threat, so many ancient and veteran trees do not receive such statutory protection. Where ancient and veteran trees exist within a development site the Council's view is that the site should be designed so that they are incorporated into the public realm where they are appropriately managed and no longer vulnerable to damaging operations carried out by a private landowner. Additionally, this means that these often attractive trees remain visible for all to enjoy and add amenity to the development.
- 4.92 Some tree populations are under threat from disease (see paragraphs 4.35 and 4.36). The loss of disease-resilient trees should be avoided as these specimens are particularly valuable. Where it is known that individual specimens are disease-resilient and there is a risk they will be lost (e.g. due to development), the Council will apply Tree Protection Orders to protect them.
- 4.93 Trees protected by TPOs and trees within Conservation Areas are legally protected. The Development Plan currently includes policy NE5 of the Local Plan 2003 which adds planning protection to these trees. However, as the trees are already protected by legislation there is no reason to carry this protection forward into the Local Plan: development management policies.

**Ancient wood pasture and historic parkland**

- 4.94 Wood pasture and parkland are areas that have been historically managed through grazing and have a very open structure with grown trees. Tree canopy cover may vary considerably but will generally be above 20 per cent. Where this habitat type has continued since 1600, it is classified as 'ancient wood pasture' or 'historic parkland', both forms of ancient woodland that should be protected to the same degree.
- 4.95 Wood pasture and parkland habitats may have been altered by activities such as sward improvement, overgrazing and tree felling, or become in-filled with secondary woodland. The presence of ancient and veteran trees is the key indicator but other factors including historic features, permanent pasture and scrub should also be taken into account. Associated species will remain present and, as with ancient woodland, the habitat can be effectively restored. Ancient wood pasture and historic parkland may not be included in the Ancient Woodland Inventory as their low tree density failed to be registered as woodland on historical maps.
- 4.96 The protection of the whole habitat is necessary even though tree cover may be comparatively sparse, so open space between trees in an area of ancient wood pasture or historic parkland should also be subject to the same protections as ancient woodland.

### **Hedgerows**

- 4.97 Hedgerows can be some of the most important habitats in parts of Britain, providing marginal connective habitat for a large number of threatened species. They provide a refuge for creatures displaced by the incremental destruction of more natural habitats to make way for increasingly intensive agriculture. They act as dispersal corridors allowing movement of important pollinating invertebrates through farmland areas and they provide breeding, nesting and feeding habitat for many birds. According to the RSPB, hedges may provide additional habitat for up to 80 per cent of woodland breeding birds, 50 per cent of native mammals and 30 per cent of butterflies, while the ditches and banks associated with hedgerows can support Common frogs and toads, newts and reptiles.
- 4.98 Ancient hedgerows tend to be the most biodiverse in terms of both plants and animals. Ancient hedgerows are those that were in existence before the Enclosures Acts (mainly passed between 1720 and 1840).
- 4.99 The removal of a hedgerow generally does not require planning permission, unless removal is proposed as part of a planning application for new development. However, under The Hedgerows Regulations 1997, the Local Planning Authority will be notified about almost all works that involve removal of hedgerows. The hedgerow will receive protection depending on its location, length and whether it meets the criteria to be considered 'important'<sup>51</sup>.

---

<sup>51</sup> See the NPPG for further detail: <https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management>.

## Policy P8: Woodland, trees, hedgerows and irreplaceable habitats

- 4.100 The Council's preferred approach is to include a policy that protects woodland, ancient and veteran trees, hedgerows and irreplaceable habitats. This is set out below.

### Preferred option for woodland, trees, hedgerows and irreplaceable habitats

The aim of this policy is to protect important woodlands, trees, hedgerows and irreplaceable habitats by having a policy that includes the following measures:

- 1) Habitats will be considered to be irreplaceable where they meet the definition in the NPPF glossary or are identified as such in documents published by the Surrey Nature Partnership. They include, but are not limited to, the following habitats:
  - a) ancient woodland,
  - b) ancient or veteran trees,
  - c) ancient wood pasture and historic parkland (including the open space between trees),
  - d) unimproved grassland,
  - e) wet heathland and bogs, and
  - f) important hedgerows<sup>52</sup> and ancient hedgerows.
- 2) Irreplaceable habitats will be protected. Development resulting in the loss, damage or deterioration of irreplaceable habitats, including those listed in paragraph 1, will be refused, unless 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. Compensation will not form part of this assessment. However, a suitable compensation strategy that delivers appropriate levels of biodiversity gains will be required if irreplaceable habitats are harmed or lost.
- 3) Planning proposals should set out clearly any likely impacts on irreplaceable habitats and, where necessary, appropriate and proportionate (in terms of quality and quantity to address the level of harm predicted) compensation.
- 4) Where ancient woodland falls within or adjacent to a development site, the following measures are required:
  - a) The application should be accompanied by information setting out the location of all significant ancient or veteran trees (a BS5837 Survey).

<sup>52</sup> Defined under the Hedgerows Regulations 1997.



- b) An appropriate buffer around the ancient woodland of a minimum of 15 metres.
  - c) There should be a clear separation between the woodland and the rest of the development, delineated by a physical feature such as a cycle lane, path or road.
- 5) Site design is expected to incorporate significant trees plus their root structures and understory within the public realm (including ancient and veteran trees and ancient woodland), and to provide green linkages between them wherever possible.

### **Alternative options for woodland, trees, hedgerows and irreplaceable habitats**

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019 and to rely on guidance in the National Planning Policy Framework and Planning Practice Guidance.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the alternatives were selected**

The only reasonable alternative to having a policy that provides specific protection for woodland, trees, hedgerows and irreplaceable habitats is to have no policy and to rely on the NPPF and policy ID4 of the Local Plan.

#### **Reasons for selecting the preferred option in light of the alternatives**

The protection provided by the NPPF is not detailed in that it does not provide much helpful policy beyond stating that the habitats in question should be protected. It is necessary to provide more detailed policy on this matter to draw upon the Council's experience with these important habitats and to set out good practice.

### **Question 8:**

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

Do you have any other comments or suggestions?

## Topic - Priority species and priority habitats on undesignated sites

### Issues

- 4.101 National legislation protects habitats on designated sites such as Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSI). Some sites and habitats are not protected by law but are protected through national policy, including ancient woodland, Sites of Nature Conservation Interest (SNCI) and Local Nature Reserves<sup>53</sup>, and policies ID4 of the Local Plan and proposed policy P8 protect these and other designated sites and habitats. Some species are legally protected, wherever they live, by legislation such as the Wildlife and Countryside Act 1981 and The Conservation of Habitats and Species Regulations 2017. The NPPF protects “irreplaceable habitats” (see policy P8).
- 4.102 Where habitats and species are protected by law, it is usually an offence to cause a negative impact on them. However, the law does not directly require measures to effect the restoration or recovery of these features that will be necessary if we are to reverse the decline in biodiversity called for by national planning policy.
- 4.103 The NPPF at paragraph 174b states “plans should... promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species”. Priority habitats correspond to those referenced in Section 41 of the NERC Act as ‘habitats of principal importance for the conservation of biodiversity in England’. Priority species are those referenced in this act as ‘species of principal importance for the conservation of biodiversity in England’.
- 4.104 Ideally, all notable habitats and species should be identified in advance and the sites on which they occur should be designated for protection, but realistically this is not always possible. The Council works with Surrey’s Local Sites Partnership to identify sites suitable for the SNCI designation which are then designated through the Local Plan process.

### Surrey Nature Partnership

- 4.105 The Surrey Nature Partnership has set out the priority habitats and species that are extant or have at least been recorded in the recent past across Surrey<sup>54</sup>. A much longer, categorical list of recorded species that have importance locally has been compiled by the SyNP as Surrey’s ‘Species of Conservation Concern’<sup>55</sup>. Many of these are found on protected sites, often within locally designated SNCIs, but some species populations will inevitably remain beyond designated sites.

---

<sup>53</sup> Local Nature Reserves are designated through national legislation but decisions on designation are taken locally.

<sup>54</sup> See Appendix 2 of Biodiversity & Planning in Surrey (SyNP 2018): [https://surreynaturepartnership.files.wordpress.com/2018/10/biodiversity-planning-in-surrey-appendix-ii-revised\\_oct-2018\\_v-1.xlsx](https://surreynaturepartnership.files.wordpress.com/2018/10/biodiversity-planning-in-surrey-appendix-ii-revised_oct-2018_v-1.xlsx).

<sup>55</sup> See The State of Surrey’s Nature Species of Conservation Concern (SoCC) data-tables: <https://surreynaturepartnership.org.uk/our-work/>.

- 4.106 It is important to ensure that the locally rare species are sufficiently protected even if their national numbers are stable, as stability of the national population does not imply their loss from local ecosystems is not an equally undesirable outcome. Additionally, there may be locally rare habitats that form important biodiversity links (e.g. as components of green/wildlife corridors and stepping stones), the loss of which would result in increasing habitat fragmentation and contribute to continuing biodiversity decline of greater significance than simply the habitat lost.

## **Policy P9: Priority species and habitats on undesignated sites**

- 4.107 The Council's preferred approach is to have a policy that provides protection for important species and habitats that occur on undesignated sites. This is set out below.

### **Preferred option for priority species and habitats on undesignated sites**

The aim of this policy is to protect species and habitats that are not covered by Policy ID4 (which protects designated sites) by having a policy that:

- 1) Requires proposals for development on or adjacent to sites where there is a priority species or habitat to preserve and enhance the relevant ecological features. Priority species and habitats include:
  - a) species and habitats protected by law,
  - b) priority habitats and species identified in strategies produced by the Surrey Nature Partnership and Natural England,
  - c) habitats sites, wildlife corridors and stepping stones identified by the Surrey Nature Partnership and in Development Plan Documents and SPDs, by Natural England and in the NPPF, and
  - d) sites identified as compensatory habitat sites on the habitat register.
- 2) The mitigation hierarchy should be applied, with avoidance of harm prioritised as the first step, followed by minimisation of harm, restoration and finally compensation as a last resort.

### **Alternative options for priority species and habitats on undesignated sites**

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019 and to rely on guidance in the National Planning Policy Framework and Planning Practice Guidance. To rely on the identification of priority habitats and species and protect them through the SNCI designation through the update of the Local Plan.

## **Justification for the choice of options and selection of preferred option**

### **Reasons the alternatives were selected**

The only reasonable alternative to having a policy protecting features of ecological value on undesignated sites is to have no policy.

### **Reasons for selecting the preferred option in light of the alternatives**

While the NPPF and policy ID4 provide general protection for biodiversity that could apply to priority species and habitats on undesignated sites, in order to provide clarity, it is considered necessary to explicitly confer protection through Local Plan policy. Priority habitats and species provide the lynch-pin for biodiversity recovery locally and nationally and therefore it is highly important that they are protected.

The NERC Act S.41 list of 'priority species of principal importance' remains a national, exemplary list, and Local Nature Partnerships are mandated to demonstrate additional species of equal importance within the context of their jurisdictional boundaries, worthy of similar levels of protection in planning policy.

### **Question 9:**

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

Do you have any other comments or suggestions?

## Topic - Contaminated Land

### Issues

- 4.108 The NPPF is clear that local plans should support the Government's objective of significantly boosting the supply of homes:

*[giving] substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land<sup>56</sup>.*

- 4.109 In delivering this objective, the NPPF requires that:

*a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation)<sup>57</sup>.*

- 4.110 Guildford Borough Council is committed to delivering sustainable development, which includes making the most effective use of brownfield land across the borough. The borough includes various sites where contamination, or potential contamination, have been identified and where land remediation will be required in order to ensure that the proposed development does not increase risk to a range of sensitive receptors, including the occupants, neighbours, and the natural environment around the development site.

- 4.111 In many cases, the remediation of the contaminated land should be sufficient in order to avoid increasing risk of contaminants to sensitive receptors. The NPPF requires that:

*after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and*

*adequate site investigation information, prepared by a competent person, is available to inform these assessments<sup>58</sup>.*

- 4.112 However, in some cases the sources of contamination may not be within the boundary of the proposed development site, or remediation may not be wholly possible due to the context of the site. In these cases, potential harm to sensitive receptors should be avoided in order to ensure that the site is suitable for the proposed use. This may be achieved through appropriate site design, ensuring that linkages are not created between sources of contamination in or around the site and sensitive receptors.

---

<sup>56</sup> NPPF Paragraph 118.

<sup>57</sup> NPPF Paragraph 178.

<sup>58</sup> NPPF Paragraph 178.

## Policy P10: Contaminated Land

- 4.113 The Council's preferred approach is to develop a policy to support the remediation of despoiled, contaminated or unstable land on appropriate sites, whilst preventing increased risk to sensitive receptors from potential sources of contamination. This is set out below.

### Preferred option for contaminated land

The aims of this policy could be secured by having a policy that:

- 1) Supports the development of land that is known or suspected to be contaminated, including land which is suspected to be affected by contamination from adjacent land, but requires that:
  - a) the full nature and extent of contamination is established through suitable assessments; clarifying that site investigations, risk assessment, remediation and associated works are to be carried out to industry best practice guidelines at the time of application<sup>59</sup>,
  - b) where evidence of contamination exists, the land is made fit for its intended purpose and avoids unacceptable harm to sensitive receptors through remediation and the design and layout of the development, avoiding creating or maintaining linkages between sources of contamination and sensitive receptors,
  - c) appropriate remedial measures are included to prevent risk to future users of the site, the surrounding area and the environment (including water supplies and aquifers),
  - d) prior to either occupation or use, a 'Verification Report' is submitted to the Council that demonstrates the agreed remediation measures have been implemented effectively.

### Alternative options for contaminated land

- 1) To not have a specific policy covering this issue but to consider planning applications against the NPPF and Planning Practice Guidance.

<sup>59</sup> These assessments should be submitted with the Planning Application.

## Justification for the choice of options and selection of preferred option

### Reasons the alternatives were selected

'No policy' is the only reasonable alternative as no further options were identified.

### Reasons for selecting the preferred option in light of the alternatives

The option to not have a specific policy covering this issue, but to consider planning applications against the NPPF and Planning Practice Guidance, was considered to provide an insufficient level of guidance for the management of development which may be affected by contaminated land within the borough. National policy provides broader guidance for this issue area and it was considered appropriate that additional details were provided in order to clarify how the national guidance should be applied for Guildford's context.

Having considered the evidence, opportunities and policy context within Guildford, the preferred approach as outlined above is considered to represent the most appropriate method of addressing the issue of contaminated land in Guildford. The preferred approach aligns most appropriately with national legislation and Local Plan Strategy and Sites 2019 policies and guidance, and most effectively addresses the issues outlined within this Plan.

## Definitions

### Contaminated Land:

The actual or suspected presence of substances in, on or under the land which may cause risks to people, human activities or the environment, regardless of whether or not the land meets the statutory definition in Part 2A of the Environmental Protection Act 1990.

### Contamination:

Both naturally occurring and manufactured hazardous substances.

### Linkage:

The pathway through which the contamination effect reaches the receiving sensitive 'receptor'; such as through air, water, or ground.

### Sensitive Receptors:

Features that are prone to damage from pollution; such as living organisms, habitats, ecological systems, property, land use, controlled waters, and the natural environment.

### Source:

The origin of potential contamination effects; such as construction activities, land use, or natural hazards

## Question 10:

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

Do you have any other comments or suggestions?

## Topic - Air Quality and Air Quality Management Areas

### Issues

- 4.114 Clean air is vital for environmental and human health. Air pollution is linked to health problems; most at risk are the young, the elderly and people with asthma or heart or lung diseases. Air pollution also negatively affects natural habitats, ecosystems and processes, and plants and animals. Serious environmental impacts of air pollution occur as a result of nitrogen deposition, acid deposition and direct toxic effects of pollutants in the air.
- 4.115 The air quality in Guildford is generally good and meets the National Air Quality Standard for nitrogen dioxide (NO<sub>2</sub>). However, road traffic is a significant cause of air pollution in the borough. Public Health England estimates that in Guildford Borough 5.7 per cent of deaths of those aged 25 years and over arise from long-term exposure to anthropogenic particulate air pollution.
- 4.116 Clean air is vital for people's health and the environment, therefore, in determining planning applications, the Council will consider the impact of a development in terms of the effects on air quality caused by both the operational characteristics of the development and traffic generated by it.
- 4.117 In November 2017, Guildford Borough Council Executive approved the Air Quality Strategy 2017-2022. The document sets out the Council's approach and priorities on air quality, plus a number of actions associated with statutory regimes and initiatives to bring about improvements.
- 4.118 Our duties to monitor air quality in the borough are set out by the Environment Act 1995, European Union Directives and the UK's Air Quality Strategy. The Environment Act 1995 requires Local Authorities to carry out annual reviews of air quality in their area. Air Quality is required to be assessed against objectives set out in the Air Quality (England) (Amendment) Regulations 2002. This assessment must be for both the present time and the likely future quality of air within its area<sup>60</sup>. If a local authority identifies noncompliance with national air quality objectives and there is relevant public exposure, then action must be taken<sup>61</sup>.
- 4.119 There are currently two Air Quality Management Areas (AQMAs) declared in the Borough due to exceedances of the annual mean Air Quality Strategy (AQS) objective for NO<sub>2</sub>. The legislation requires local authorities to declare an AQMA when levels of certain pollutants exceed or are expected to exceed the relevant objective levels. In the case of GBC, an AQMA was first declared in 2017, based on an exceedance of the NO<sub>2</sub> annual mean objective of 40 micrograms per cubic meter (µgm-3). The order came in to effect on 1 February 2018 following the Executive's approval on 28 November 2017. This AQMA covers the area along The Street, Compton, B3000. The Council have recorded exceedances of annual mean, Air Quality Objective (AQO) for NO<sub>2</sub> within the AQMA since 2014. The road traffic emissions are the source of NO<sub>2</sub> in the area.

---

<sup>60</sup> 2018 Air Quality Annual Status Report (ASR).

<sup>61</sup> Part IV of the Environment Act 1995 and subsequent regulations, e.g. Air Quality (England) Regulations 2000 (as amended).



- 4.120 The Shalford AQMA was the second AQMA declared on 5 July 2019, following approval by the Guildford Joint Committee. The monitoring in Shalford started in 2018 at two locations using diffusion tubes. The annual air quality objective for NO<sub>2</sub> of 40 µg/m<sup>3</sup> was found to be at a higher level at one receptor location.
- 4.121 Where an AQMA has been declared, the local authority must produce an Air Quality Action Plan (AQAP), which sets out the options for working towards improving the air quality. The Council have published an AQAP which outlines the actions that Guildford Borough Council will deliver between 2019 - 2020 in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors within the AQMA. It has been developed in recognition of the legal requirement on the local authority to work towards Air Quality Strategy (AQS) objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part and to meet the requirements of the Local Air Quality Management (LAQM) statutory process.

### **Biomass Technology**

- 4.122 Burning biomass for heating buildings is a low carbon technology for generating energy promoted by the NPPF, but can result in emissions of harmful pollutants, such as particulate matter and nitrogen oxides. In recent years there has been a substantial increase in the use of biomass in larger plants for electricity generation and in domestic and small-scale combustion appliances<sup>62</sup>. In an attempt to reduce their overall CO<sub>2</sub> emissions and in response to incentives such as the Renewable Heat Incentive (RHI)<sup>63</sup> many local authorities are considering proposals for the installation of biomass boilers either for heat provision within their own estate or for CHP<sup>64</sup>.
- 4.123 The air quality implications of such developments are a concern for many local authorities who may have currently declared AQMAs. Environmental Protection UK have produced guidance documents and a set of accompanying tools available for Local Authorities in England<sup>65</sup> to assist with assessing individual planning applications for biomass and CHP<sup>66</sup> installations and to help shape policy decisions with the aim of minimising impacts on local air quality.
- 4.124 The potential risk of a breach of air quality standards is increased if the biomass boiler is in or near (and could potentially affect) an AQMA. If air quality in the area around the biomass boiler is marginal there is a risk that emissions from the boiler could trigger a new AQMA. In urban areas, or where an AQMA has been declared, the council would not expect biomass heat deployment.

---

<sup>62</sup> Defra (2017) The Potential Air Quality Impacts from Biomass Combustion. Available online: [https://uk-air.defra.gov.uk/assets/documents/reports/cat11/1708081027\\_170807\\_AQEG\\_Biomass\\_report.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat11/1708081027_170807_AQEG_Biomass_report.pdf).

<sup>63</sup> Ofgem (2018) About the Domestic RHI. Available online at <https://www.ofgem.gov.uk/environmental-programmes/domestic-rhi/about-domestic-rhi>.

<sup>64</sup> EPUK (2013) Solid fuel and air quality, an update for Local Authorities. Available online at: <https://www.environmental-protection.org.uk/wp-content/uploads/2013/07/Solid-Fuel-and-Air-Quality-Update-for-LAs-final-060413.pdf>.

<sup>65</sup> EPUK (2009) Biomass and air quality guidance for Local Authorities, England and Wales. Available online at [https://uk-air.defra.gov.uk/assets/documents/reports/cat11/1708081027\\_170807\\_AQEG\\_Biomass\\_report.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat11/1708081027_170807_AQEG_Biomass_report.pdf).

<sup>66</sup> EPUK (2012) Combined heat and power: air quality guidance for Local Authorities. Available online at [http://www.iaqm.co.uk/text/guidance/epuk/chp\\_guidance.pdf](http://www.iaqm.co.uk/text/guidance/epuk/chp_guidance.pdf).

## Policy P11: Air Quality and Air Quality Management Areas

- 4.125 The Council's preferred approach is to include a DM policy that seeks to ensure new development does not have adverse impact on air quality by taking into account the presence of Air Quality Management Areas (AQMAs) and seek opportunities to actively improve air quality borough-wide to help secure net improvements in overall air quality where possible.

### Preferred option for Air Quality and Air Quality Management Areas

The aim of this policy is to reduce exposure to poor air quality across the borough and improve levels of air pollutants in Air Quality Management Areas (AQMA) and surrounds by having a policy that:

- 1) Will only permit development where it will not give rise to adverse impacts on health and quality of life from air pollution. 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.
- 2) Will require an air quality assessment for development proposals that have the potential for significant air quality impacts, including those which:
  - a) are classed as major development and have the potential, either individually or cumulatively, for significant emissions; or
  - b) are likely to result in an increase in pollution levels in an Air Quality Management Area (AQMA); or
  - c) introduce biomass technology (i.e. applications for biomass burners that require planning permission and are not 'permitted development'); or
  - d) introduce new sensitive receptors into AQMAs and are likely to expose people to existing sources of air pollutants.
- 3) Requires that, where an air quality assessment identifies an unacceptable impact on or from air quality, an emissions mitigation assessment and cost calculation will be required.
- 4) Requires applicants to demonstrate that appropriate mitigation will be provided to ensure that the new development is appropriate for its location and unacceptable risks are avoided.
- 5) Will support the deployment of biomass technology (high quality and low emission plant) in locations off the gas grid where coal and oil-fired plant are currently used and where no cleaner or greener feasible alternative is available.
- 6) Will not support the deployment of biomass technology in new development in the AQMAs.

- 7) Will require development to demonstrate conformity with the Institute of Air Quality's guidance 'Land-Use Planning and Development Control: Planning for Air Quality' (2017)<sup>67</sup>.

### **Alternative options for Air Quality and Air Quality Management Areas**

- 1) To not have a specific policy covering this issue and rely on the Local Plan Policies ID3 and national guidance.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

#### **Reasons for selecting the preferred option in light of the alternatives**

This policy supports the Council's Air Quality Action Plan, 2019. It has been developed having regard to the latest current European and national legislation, in addition to national policy and various other current best practice guidance documents.

The Council's preferred option is to ensure that new development does not cause adverse effects on air quality within and nearby the AQMAs and maintain levels of air pollutants in the AQMA and seeking opportunities to improve air quality at the borough-wide level.

Having considered the evidence, Policy P8 sets out the Council's preferred approach to ensuring air quality is maintained at acceptable concentrations as set out in the national air quality strategy. It seeks to improve air pollutants levels within and surrounding the AQMA in accordance with the AQMP measures and the Council's Air Quality Strategy.

### **Question 11:**

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

Do you have any other comments or suggestions?

<sup>67</sup> Available online at: <http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf>.

## Topic - Water Resources and Water Quality

### Water resources and water quality

- 4.126 Development can have significant detrimental impacts on water resources. For example, by placing additional strain on existing water supplies, or by affecting flood patterns through increasing the amount of impermeable land in areas at risk of flooding. The pollution of water resources through development may also cause significant adverse impacts on the health and wellbeing of sensitive receptors, both directly and indirectly, through the degradation of the natural environment and local amenity. As such, the conservation and enhancement of the quality and quantity of ground and surface water resources, provision of adequate services, and management of flood risk, become essential to the planning process.
- 4.127 The conservation and improvement of water resources provide a range of benefits; including an improved natural environment and further opportunities to enhance biodiversity. These improvements would also help to maintain a good quality supply of drinking water within the borough and help meet the requirements of the EU Water Framework Directive (2000/60/EC). The Directive requires that member states prevent the deterioration of all water bodies (groundwater and surface waters), seeking to improve them, with the aim of meeting 'good status' or 'good ecological potential' by 2027. The Directive establishes the statutory framework for the protection of groundwater and in-land surface water resources, estuaries, and coastal waters. The South East River Basin Management Plan 2016<sup>68</sup>, prepared by the Environment Agency, provides a framework for protecting and enhancing the benefits provided by the water environment. The Management Plan highlights the areas of land, and bodies of water, that have specific uses that require special protection. These include waters used for drinking water, bathing, commercial shellfish harvesting and those that sustain the most precious wildlife species and habitats. It ensures that these areas have legally-binding objectives in place that protect those uses from potentially harmful activities and development. The Council will therefore seek to conserve and enhance the water environment in order to improve water quality and achieve the objectives of the EU Water Framework Directive, having regard to South East River Basin Management Plan.
- 4.128 The Environment Agency's Approach to Groundwater Protection (February 2018 Version 1.2)<sup>69</sup> provides useful information and guidance on the various risks to groundwater quality. This document will be of interest to developers, planners, environmental permit applicants and holders, abstractors, operators and anyone whose current or proposed activities have an impact on, or are affected by, groundwater resources. This document updates the Groundwater protection: principles and practice (GP3).
- 4.129 It is an offence under the Water Resources Act 1991 to pollute ground or surface water.

---

<sup>68</sup> Defra (2015) Water for life and livelihoods. Part 1: South East river basin district River basin management plan. Available online at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718337/South\\_East\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf).

<sup>69</sup> Environment Agency (2018) The Environment Agency's approach to groundwater protection. Available online at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf).

**Issues**

- 4.130 Guildford borough has an extensive and varied water environment, including numerous aquifers, rivers, lakes, ponds, reservoirs and aquifer protection zones. Maintaining and enhancing the quality of these water resources is important to help retain these essential sources of water supply. Additionally, the maintenance of a high-quality water environment is also valuable for general amenity and an excellent recreational resource. The protection of the water environment is particularly important within the borough as the quality of groundwater resources are easily polluted, directly and indirectly, and can pose a serious risk to public health.
- 4.131 Within the borough, much of the River Wey currently achieves 'moderate' status, with some tributaries currently achieving only 'poor' or 'bad'. The River Wey directly upstream from the borough is largely 'poor' quality status. Groundwater presents an important consideration for development proposals, with approximately 30 per cent of the borough located on principle aquifers and the presence of 14 source protection zones (SPZ).
- 4.132 Certain types of development pose risks to ground and surface water quality. As set out above, the council has a statutory duty to improve the condition of water bodies within the Guildford area, working towards the target of 'Good Ecological Status'. New development adjacent to underground or surface water bodies is expected to contribute towards this objective.
- 4.133 The NPPF requires the prevention of new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution. This is set out in the National Planning Policy Framework, paragraph 170 (e).
- 4.134 Further guidance on water quality is also set out in Planning Practice Guidance. It is focused on "Water supply, Wastewater and Water Quality".
- 4.135 Policy P4(6) of the LPSS requires development within Groundwater Source Protection Zones and Principal Aquifers to have no adverse impact on the quality of the groundwater resources and to not put at risk the ability to maintain a public water supply. However, the policy does not explicitly address the issue of maintaining the quantity of surface and groundwater (including reservoirs).
- 4.136 Additionally, Policy ID4(7) of the Local Plan seeks to ensure that development proposals comply with the Water Framework Directive in relation to water quality. However, the policy does not address the circumstances surrounding likely significant adverse impacts caused by new development on health and quality of life, including water quality and quantity of water.

## Policy P12: Water Resources and Water Quality

- 4.137 The Council's preferred approach is to develop a policy that ensures new development does not have an adverse impact on water quality, either directly through the pollution of surface or groundwater resources, or indirectly through the treatment of waste water by whatever means. The policy also sets out the approach to water quality to meet the council's statutory duties.

### Preferred option for water resources and water quality

The aim of this policy is to ensure that new development does not cause an unacceptable risk to surface or groundwater resources by having a policy that:

- 1) Opportunities to improve water quality are used wherever possible. Proposals that are likely to have an impact on water resources will be required to demonstrate that the proposal will not cause unacceptable deterioration to water quality or have an unacceptable impact on:
  - a) the flow or quantity of groundwater; and
  - b) the quality of surface or groundwater resources.
- 2) Supports the development or expansion of infrastructure associated with water supply, surface water drainage and wastewater treatment facilities where proposals are consistent with other relevant development plan policies such as flood risk, contamination and protection of the natural and built environment.
- 3) Requires new development that is likely to have an impact on underground or surface water bodies covered by the Water Framework Directive and the South East River Basin Management Plan to contribute towards those water bodies maintaining or achieving 'Good Ecological Status'. This may take the form of on-site measures wherever possible, or a financial contribution to off-site measures.

### Alternative options for water resources and water quality

- 1) To not develop a specific policy covering the issues raised and rely on developers entering discussion with the Environment Agency at planning application stage and complying with Local Plan Policies D2, ID4 and P4.

## **Justification for the choice of options and selection of preferred option**

### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

### **Reasons for selecting the preferred option in light of the alternatives**

Having considered the available evidence, the Council's preferred option is to ensure that new development does not have an adverse impact on water quality, either directly through the pollution of surface or groundwater resources, or indirectly through the treatment of waste water by whatever means. The preferred approach is to limit this to locations where adequate water resources already exist, or where new provision of water resources can be made in time for the new development and without adversely affecting abstraction, river flows, water quality, agriculture, fisheries, amenity or nature conservation.

The draft policy also seeks to conserve and enhance the water environment in order to achieve the objectives of the EU Water Framework Directive, having regard to South East River Basin Management Plan. The improvement of both chemical and ecological water quality will be encouraged.

### **Question 12:**

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

Do you have any other comments or suggestions?

## Topic - Sustainable Drainage Systems

### Issues

- 4.138 Development has the potential to cause an increase in the amount of impermeable surfaces within the area. This is likely to cause an associated increase in surface water runoff rates and volumes and consequently a potential increase in downstream flood risk, due to the overloading of sewers, watercourses, culverts and other drainage infrastructure.
- 4.139 In urbanised areas, where many surfaces are covered by buildings, paving and other hardstanding, natural infiltration is limited. Instead, conventional drainage networks consisting of pipes and culverts concentrate the direct discharge to specific parts of the local watercourse.
- 4.140 Problematically, pipe and culvert networks often increase both the velocity and volume of surface water runoff, which can contribute to increased flooding downstream. These networks can also cause deterioration in river water quality caused by diffuse pollution<sup>70</sup>. Additionally, combined sewers (which collect both surface water runoff and foul waste water) are prone to being overwhelmed by surface water runoff during periods of heavy rain, which increases the risk that polluted water is released into rivers. The likely impact of climate change, which includes more intense rainfall, will exacerbate this situation further.
- 4.141 Recent changes to planning legislation provide that applications for major development are required to implement sustainable drainage systems ('SuDS'), in accordance with the interim national standards published in April 2015<sup>71</sup>. Therefore, planning applications for major development should be accompanied by a site-specific drainage strategy that demonstrates the proposed drainage scheme is in compliance with the NPPF and the non-statutory technical standards for sustainable drainage systems.
- 4.142 The NPPF reinforces that planning applications that fail to propose SuDS beyond conventional drainage techniques could be rejected. Sustainable drainage systems should form part of an integrated approach to design and be secured by detailed planning conditions so that the proposed SuDS are implemented and maintained effectively. Maintenance options for SuDS must clearly identify who is responsible for their maintenance. Funding for maintenance should be fair for householders and premises occupiers and set out a minimum standard to which the SuDS must be maintained.
- 4.143 The runoff destination should be the principal consideration when taking into account design criteria for SuDS. The following possible destinations should be considered in order of preference, where appropriate:
- to ground;
  - to surface water body;
  - to surface water sewer;
  - to combined sewer.

---

<sup>70</sup> Diffuse pollution is the release of potential pollutants that have no specific point of discharge. Individually they may have no measurable effect on the water environment but at a catchment scale they have a significant impact.

<sup>71</sup> LASOO (2016) Non-statutory technical standards for sustainable drainage. Available online at [https://www.susdrain.org/files/resources/other-guidance/lasoo\\_non\\_statutory\\_suds\\_technical\\_standards\\_guidance\\_2016\\_.pdf](https://www.susdrain.org/files/resources/other-guidance/lasoo_non_statutory_suds_technical_standards_guidance_2016_.pdf).



- 4.144 Drainage systems must be designed and constructed so that discharged surface water does not adversely impact the water quality of receiving water bodies, both during construction and when operational. Effects on water quality should also be investigated when considering the runoff destination in terms of the potential hazards arising from development and the sensitivity of the runoff destination. Developers should also establish that proposed outfalls are hydraulically capable of accepting the runoff from SuDS.
- 4.145 It is important that all SuDS are designed giving full regard to safety issues. Therefore, techniques such as heavy dense planting around the larger bodies of water such as balance ponds, and gentle slopes should be considered.
- 4.146 It is important to understand the location and capacity of existing drainage to determine what infrastructure could or should be reused in a SuDS scheme. When building on brownfield or pre-developed sites, existing on-site infrastructure should be documented and mapped.
- 4.147 The determination of hydraulic impracticability may consider issues including whether surface water flows are reduced to such a level over parts of the site as to be at risk of blockages, or where there would be a requirement to install pumps in order to pump water out of SuDS systems in a location where the downstream catchment is not at risk of flooding.
- 4.148 Practice Guidance 2015 produced by Local Authority SuDs Officer Organisation (LASOO) supports the technical standard and provides a brief explanation to provide clarification.
- 4.149 The CIRIA<sup>72</sup> has produced a number of guidance documents<sup>73</sup> covering a range of opportunities and challenges related to general water management, all the way through to specific SuDS components. The more notable publications are CIRIA C753 The SuDS Manual and CIRIA C713 Retrofitting for surface water management.
- 4.150 LPSS Policy P4 (5): Flooding, flood risk and groundwater protection zones requires all development proposals to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off by giving priority to incorporating Sustainable Drainage Systems (SuDs) to manage surface water. The policy does not provide specifics with regard to the design and standards required for SuDs. Therefore, there is an opportunity to develop a policy that specifically addresses SuDS in order to provide greater clarity on what the Council expects from developers in relation to the SuDs design and technical standards.

---

<sup>72</sup> CIRIA is the construction industry research and information association. Operating across market sectors and disciplines CIRIA deliver a programme of business improvement services and research activities for our members and those engaged with the delivery and operation of the built environment. CIRIA is an independent member based, not-for-profit association. For more information visit [www.ciria.org](http://www.ciria.org).

<sup>73</sup> CIRIA guidance. [Online]. Available online at <https://www.susdrain.org/resources/ciria-guidance.html>.

## Policy P13: Sustainable Drainage Systems

### Preferred option for sustainable drainage systems

The aims of this policy could be secured by having a policy that:

- 1) Requires that proposals for major development<sup>74</sup>, incorporate Sustainable Drainage Systems (SuDS) where required by the lead local flood authority.
- 2) Requires development proposals to demonstrate that SuDS have been included from the early stages of site design in order to incorporate appropriate SuDS within the development. SuDS schemes will be required to satisfy technical standards and design requirements in accordance with Defra's technical standards for sustainable drainage systems<sup>75</sup>.

### Alternative options for sustainable drainage systems

- 1) To not have a specific policy covering this issue and rely on developers engaging with the Environment Agency at planning application stage and complying with Local Plan Policy P4(5).

### Justification for the choice of options and selection of preferred option

#### Reasons the alternatives were selected

'No policy' is the only reasonable alternative as no further options were identified.

#### Reasons for selecting the preferred option in light of the alternatives

The Council's preferred option is to ensure that new major development incorporate SuDS in the early stages of the site design and satisfy technical standards and design requirements in accordance with Defra's Sustainable Drainage Systems technical standards for sustainable drainage systems.

<sup>74</sup> The definition of major development includes residential development of 10 dwellings or more (gross) and non-residential development of 1,000 sqm gross new floorspace or more.

<sup>75</sup> Defra (2015) Sustainable Drainage Systems: technical standards for sustainable drainage systems. Available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/415773/sustainable-drainage-technical-standards.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf).

Having considered the evidence, Policy P10 sets out the Council's preferred approach to SuDs. Policy P10 is built upon the principles previously set out in the strategic Local Plan Policy P4 (5), providing further clarity and detail in order for it to effectively guide planning applications by specifying the type of developments subject to mandatory use of SuDs, and details on technical standards and design requirements for greenfield and brownfield sites.

**Question 13:**

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

Do you have any other comments or suggestions?

## Topic - Regionally Important Geological / Geomorphological Sites

### Issues

- 4.151 Regionally Important Geological / Geomorphological Sites ('RIGS') are geological or geomorphological sites, excluding SSSIs, that are valuable for their educational, scientific, historic or aesthetic importance. There are nine RIGS sites in the borough that have been identified by the Surrey RIGS Group. The Council intends to protect these sites in line with the protection afforded to 'Local sites' in LPSS Policy ID4: Green and blue infrastructure.
- 4.152 A list of the local sites is available online at: <https://surreynaturepartnership.org.uk/our-work/>. At the time of publication, the list of RIGS in the borough includes:
- Earl of Onslow Pit (West Clandon Chalk Pit)
  - Newlands Corner Car Park
  - Albury Downs (Water Lane) Chalk Pit
  - Water Lane Sand Pit
  - Guildford Lane, Albury
  - Blackheath Lane, Albury
  - Compton Mortuary Pit
  - Wood Pile Quarry
  - Warren Lane, Albury

## Policy P14: Regionally Important Geological / Geomorphological Sites

- 4.153 The Council's preferred approach is to have a policy that protects the value of RIGS sites in line with LPSS Policy ID4. This is set out below.

### Preferred option for Regionally Important Geological / Geomorphological Sites

The aims of this policy could be secured by having a policy that:

- 1) Requires that development proposals that are likely to materially harm the conservation interests of Regionally Important Geological/Geomorphological Sites must demonstrate that the need for the development clearly outweighs the impact on biodiversity.
- 2) Ensures that where this test is met, 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. The applicant must demonstrate that any necessary avoidance and mitigation measures will be implemented and maintained effectively.

## Alternative options for Regionally Important Geological / Geomorphological Sites

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019 and guidance in the National Planning Policy Framework and Planning Practice Guidance.

## Justification for the choice of options and selection of preferred option

### Reasons the alternatives were selected

'No policy' is the only reasonable alternative as no further options were identified.

### Reasons for selecting the preferred option in light of the alternatives

The option to not have a specific policy covering this issue, but to consider planning applications against the NPPF and Planning Practice Guidance, was considered to provide an insufficient level of guidance for the management of development which may affect RIGS within the borough. National policy provides broader guidance for this issue area and it was considered appropriate that additional details were provided in order to clarify how the national guidance should be applied for Guildford's context.

Having considered the evidence, opportunities and policy context within Guildford, the preferred approach as outlined above is considered to represent the most appropriate method of addressing the issue of development affecting RIGS in Guildford. The preferred approach aligns most appropriately with national legislation and Local Plan Strategy and Sites 2019 policies and guidance, and most effectively addresses the issues outlined within this Plan.

## Question 14:

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

Do you have any other comments or suggestions?

## Chapter 5: Design

### Design

#### Introduction

##### National Planning Context

##### National Planning Policy Framework

- 5.1 The NPPF considers the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 5.2 Design policies need to reflect local aspirations that are grounded in an understanding and evaluation of each area's defining characteristics.
- 5.3 Chapter 12 Achieving well-designed places paragraphs 124 – 132 sets out the responsibilities and requirements for applicants of development proposals and decision makers with regard to achieving well – designed places.
- 5.4 The Borough has a wealth of historic assets including both designated Listed buildings, Conservation Areas, Scheduled Ancient Monuments, listed Parks and Gardens, and non-designated heritage assets.
- 5.5 Chapter 16 Conserving and enhancing the historic environment is also particularly relevant in ensuring that new development is considered within the context of the Borough's historic environment and where high standards of design, protection or enhancement will be required. Where new development is within the context of designated and non-designated heritage assets then Paragraphs 184 – 202 may also be relevant.
- 5.6 The following forms part of the Government's collection of planning practice guidance;
- National Design Guide – Planning practice guidance for beautiful, enduring and successful places. Ministry of Housing, Communities and Local Government 2019.
- 5.7 In addition to satisfying the relevant policies within the NPPF, decisions affecting the historic environment the statutory considerations of the following must also be addressed;
- The Planning (Listed Building and Conservation Areas) Act 1990
  - The Ancient Monuments and Archaeological Areas Act 1979

5.8 Historic England has produced a number of guidance documents in the form of Good Practice Advice, in addition to other documents covering other relevant matters in achieving sustainable, well considered and designed environments:

- GPA 1 - The Historic Environment in Local Plans<sup>76</sup>.
- GPA 2 - Managing Significance in Decision-Taking in the Historic Environment<sup>77</sup>.
- Historic England – Places Strategy.
- Heritage: the foundation for success.
- Good Practice Advice Note: The Setting of Heritage Assets (GPA 3)<sup>78</sup>.
- Building in Context<sup>79</sup>.

### **Local Strategies and Evidence**

#### **Relevant policies in Guildford Borough Local Plan 2003 (to be replaced in the new Local Plan)**

- Design Code G5
  - G5 (2) Scale, Proportion and Form
  - G5 (3) Space round Buildings
  - G5 (4) Street Level Design
  - G5 (5) Layout
  - G5 (7) Materials and Architectural Detailing
  - G5 (8) Traffic, Parking and design
  - G5 (9) Landscape Design
- Policy G7 Shopfronts design
- Policy G8 Advertisements
- Policy G9 Projecting signs in the High Street

#### **Relevant policies in Guildford borough Local Plan: strategy and sites 2019**

- Policy D1: Place Shaping
- Policy D3: Historic Environment

---

<sup>76</sup> Available online at: <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1/>.

<sup>77</sup> Available online at: <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/>.

<sup>78</sup> Available online at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>.

<sup>79</sup> Available online at: <http://www.building-in-context.org/>.

**Relevant Guildford Borough Council supplementary planning guidance**

- Guildford Town Centre views 2019
- Conservation Area Character Appraisals
- Landscape Character Assessments (Guildford Borough Council 2009)
- Residential Extensions and Alterations Guide SPD 2018
- Advertisements and Signs 2004

**Relevant Objectives from LPSS**

- Objective 1:** To deliver sufficient sustainable development that meets all identified needs.
- Objective 2:** To improve opportunities for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities.
- Objective 3:** To ensure that all development is of high-quality design and enables people to live safe, healthy and active lifestyles.
- Objective 5:** To protect and enhance our heritage assets and improve the quality of our built and natural environment.
- Objective 7:** To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.
- Objective 10:** Support and expand the economic vitality of our rural areas whilst protecting existing heritage, landscape and character.
- Objective 11:** Reinforce Guildford's role as Surrey County's premier town centre destination whilst protecting and enhancing its cultural facilities and heritage assets.
- Objective 12:** To facilitate the timely provision of necessary infrastructure to support sustainable development.



## Topic - Achieving a High Quality Design and Local Distinctiveness

### Design

- 5.9 The long standing, fundamental principles of good design are that it is: 'fit for purpose, durable, and brings delight' (Vitruvius).
- 5.10 All development should aspire to the highest standards of design including layouts, architecture and construction design, materials and detailing, open space, landscaping and public realm.
- 5.11 The historic environment is central to defining a sense of place, establishing local distinctiveness, and plays a positive role in the character of an area, and in place shaping. New development needs to preserve or enhance Guildford's historic character and the quality of the best of its built environment. Guildford has a wealth of historic areas and assets including development of the mediaeval period and wealth of timber framed buildings, the Georgian period, early C20 development based on the Garden City Movement, early C20 industrial buildings, and nationally renowned buildings by internationally renowned architects.
- 5.12 Good design reinforces local identity and urban design characteristic and can play a key role in providing sustainable development. New development must be accessible to all and meet the needs of a diverse population.
- 5.13 The Council seeks to secure high-quality contemporary architecture and urban design to further enhance the attractiveness of the Borough and to respond to modern-day needs. Within our urban areas and villages this must respect the historic environment, be respectful of the existing area and create new development that sits in harmony with its context. On sites where there is less of an urban context new innovative designs and place making will be encouraged that respond to the landscape, introduces sustainable, flexible and adaptable architectural designs and living, provides connectivity, open space and legibility, social inclusion and safety, that will create new areas with their own identity and distinctive sense of place.

### Character of a place

- 5.14 Understanding the character and context of a place and how to sensitively respond to it, is an essential part of delivering successful development.
- 5.15 The context of a place comes from an understanding of the way places, sites and spaces interrelate with one another either physically, functionally or visually and the way in which they are experienced and understood by users. The character of a place comes from an understanding of the different elements that make up the place, the historical, cultural, social, and economic factors that have contributed to and combined to create the identity and sense of place.
- 5.16 The Council will require a thorough analysis and assessment of the context and character of areas in development proposal within the Borough.

## Issues

- 5.17 The purpose of design quality in new development is to create well designed and well-built places that benefit people and communities; this includes people who will use a place for a variety of purposes. Places affect us all: as a place in which to live, work and spend leisure and recreational time. They influence the quality of our experience, affect our sense of enjoyment, our wellbeing, safety and security, our belonging and community inclusion.
- 5.18 Within Guildford borough new design policies need to address policies from the 2003 Local Plan as follows:
- Scale, proportion and form - old G5(2)
  - Space around buildings – old G5 (3)
  - Street level design G5 (4)
- 5.19 The intrinsic value of the borough's varied, rich and high-quality historic environment together with highly attractive surrounding landscapes are great assets. To successfully attract people and investment this environment must be respected and where appropriate sensitively developed. New development should not detract from the existing qualities of the environment that make the Borough an attractive and valued location for residents, businesses and visitors. New development can help enhance the historic built environment and must take opportunities for improving the character, distinctiveness and quality of places to create areas that are attractive, well connected and legible, that harmonise with the surrounding built form or landscape.
- 5.20 Modern architecture, innovative designs and artistic expression will be encouraged where appropriate to create new areas of interest and character within the Borough for example within strategic urban extensions, and standalone sites, such as Wisley or new development opportunities on the edge of villages now out of the Green Belt. Some of these areas are covered by Heritage asset protection; others are not. The preferred option Policies reflect the development proposals likely to come forward in varying existing contexts and the opportunities for new place making, and the integration of some large strategic sites within the town and historic settings.
- 5.21 Within the town, the Guildford Views SPD sets out the sensitivity of the town to heights, cones of views, detractor buildings and how these must be regarded.

## Policy D4: Achieving High Quality Design and Local distinctiveness

5.22 The Council's preferred approach is to include DM policies that expand upon the general principles set out in LPSS Policy D1: Place shaping:

Good design is essential to creating places, buildings and spaces that work well for all, look good, last well, and are adaptable over time to meet the needs of future generations. The NPPF establishes that planning should always seek to secure high quality design and that good design is indivisible from good planning. The National Design Guide 2019 Planning practice guidance for beautiful, enduring and successful places illustrates how well-designed places can be achieved in practice.

5.23 The Council's preferred approach is set out below:

### Preferred option for achieving high quality design and local distinctiveness

The aim of this policy is to enable the following:

- Delivering high quality design across the Borough
- Protecting the character and local distinctiveness of the Borough
- Achieving new developments that contribute to and enhance existing character and create distinctive new environments

By having a policy as follows:

#### Design Standards

General Principles:

- 1) All development must have regard to the National Design Guide 2019 and all future updates, SPD's and other related guidance.
- 2) All new development must demonstrate high quality of design which demonstrates a clear understanding of the local area, its character, landscape and views, significance and features of interest.
- 3) Sites should consider the opportunity to create site specific identities.
- 4) To avoid piecemeal development, where allocated sites are in separate ownerships, the Council seeks comprehensive and integrated design to ensure the best use of land and well connected development.
- 5) Development designs should show how they respect and respond to the history of a place, its surrounding context, and how they will make a positive contribution to prevailing character, and create design led new identities with regard to:

- a) layout, plot sizes, building patterns and rhythms, lines and proportions,
  - b) form, scale and massing,
  - c) building heights,
  - d) urban grain and the pattern of routes, connections and spaces locally and more widely,
  - e) materials,
  - f) landscape – need to provide a high standard of design and materials throughout and includes means of enclosure, paving and planting, and
  - g) topography and views.
- 6) New development will also be expected to:
- a) be inclusive, integrated and accessible for all occupants now and in the future,
  - b) promote health with opportunities for recreation, leisure and social interaction, and
  - c) promote safer streets and public areas and pedestrian friendly spaces.

**Character of development**

- 7) The Council's objective is to ensure that all new development secures high quality design through a policy that will require that:
- a) new development respects local character and context including established street patterns, urban grain, building lines and topography.
  - b) development proposals should respect, preserve and enhance local character and the surrounding environment through appropriate scale, height, massing, form, proportions and roof forms.
  - c) layouts create an identifiable character that is connected to surrounding area and easily understood by users.
  - d) high quality materials and detailing will be required in new built forms that reflect and reinforce local identity and sustain distinctive character; including architectural styles and detailing. Traditional natural materials will be supported to provide regional identity and character. High quality modern materials will be supported where they are sustainable, durable and long lasting, and they provide new or complementary identities and distinctiveness that contribute to and enhance local character.
  - e) new development will be required to respond to the Guildford Town Centre Views SPD.
  - f) new development creates lively, active frontages, visual interest and a sense of identity to the public realm and at pedestrian level.

## **Alternative options for achieving high quality design and local distinctiveness**

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019 and guidance in the National Planning Policy Framework, National Design Guide and Planning Practice Guidance.

## **Justification for the choice of options and selection of preferred option**

### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

### **Reasons for selecting the preferred option in light of the alternatives**

The option to not have a specific policy covering this issue, but to consider planning applications against the NPPF and Planning Practice Guidance, was considered to provide an insufficient level of guidance for the management of development within the borough.

Having considered the evidence, opportunities and policy context within Guildford, the preferred approach as outlined above is considered to represent the most appropriate method of addressing the issue of privacy and amenity in Guildford. The preferred approach aligns most appropriately with national legislation and Local Plan Strategy and Sites 2019 policies and guidance, and most effectively addresses the issues outlined within this Plan.

### **Question 15:**

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

Do you have any other comments or suggestions?

## Topic - Privacy and Amenity

### Issues

- 5.24 The Council recognises that amenity can be compromised through development such as detrimental loss of daylight and sunlight to existing and adjacent occupiers, loss of privacy and outlook due to the proximity and design of developments, harmful noise, odour, vibration and air pollution from proposed developments.
- 5.25 The Council's preferred policy seeks to ensure that these issues are taken into account, and also that new development takes into account other amenity uses needed such as bin and bike storage, and electric charging facilities that must be integrated into the built form and ensuring overall good design in the provision of amenity, amenity uses and privacy.

## Policy D5: Privacy and Amenity

### Preferred option for privacy and amenity

The aim of this policy is to seek to protect the quality of life of all occupiers and neighbours.

This will be achieved by supporting proposals that:

- 1) protect privacy and amenity of communities, all occupiers and neighbours,
- 2) ensure developments maximise opportunities for provision of private outdoor amenity space, and
- 3) provide lighting schemes that achieve their purpose without adverse glare, light spillage on close and longer views, or adversely effecting amenity of occupiers.

The factors that will be considered to ensure that privacy and amenity are addressed include:

- 1) visual privacy, outlook, sun light, daylight and overshadowing, artificial lighting levels,
- 2) noise and vibration,
- 3) odour, fumes and dust,
- 4) bin and bike storage, and
- 5) provision and access to electric vehicle charging points.

### **Alternative options for privacy and amenity**

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019 and guidance in the National Planning Policy Framework and Planning Practice Guidance.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

#### **Reasons for selecting the preferred option in light of the alternatives**

The option to not have a specific policy covering this issue, but to consider planning applications against the NPPF and Planning Practice Guidance, was considered to provide an insufficient level of guidance for the management of development within the borough.

Having considered the evidence, opportunities and policy context within Guildford, the preferred approach as outlined above is considered to represent the most appropriate method of addressing the issue of privacy and amenity in Guildford. The preferred approach aligns most appropriately with national legislation and Local Plan Strategy and Sites 2019 policies and guidance, and most effectively addresses the issues outlined within this Plan.

#### **Question 16:**

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

Do you have any other comments or suggestions?

## Topic - Shopfronts, Advertisements and Hanging Signs

- 5.26 The design of new or altered shopfronts, advertisements and hanging signs can have a significant impact on the appearance, character and vitality of an area, and the quality and appearance of areas in which these are provided. The quality and character of places can suffer from poorly designed proposals. A high standard of design for these developments will be required throughout the borough, not just in more sensitive locations such as Conservation Areas.

### Policy D6: Shopfront Design

#### Issues

- 5.27 Shopfronts contribute considerably to the character and distinctiveness of centres. They are an essential part of the character and attractiveness of many areas and contribute to the vibrancy of streets and public places. The Council will seek to protect existing shopfronts that make a positive contribution to the appearance and character of an area for example because of their architectural or historic interest and taking into account the quality of its design, its historic importance, and its location.
- 5.28 The Council will seek to ensure that new shopfronts are of high quality and sensitive to the area in which they are located, and contribute to the particular character, vitality and attractiveness of an area. The detailing, type and quality of materials and finishes used on shopfronts are highly visible features within the street scene and will be expected to be of high quality and durable design. Shopfronts should be accessible for all.
- 5.29 The Council's preferred policy option will ensure the quality design of all shopfronts within the borough.

#### Preferred option for shopfront design

The design of new or altered shopfronts can have a significant impact on the appearance, character and vitality of an area. Where new shopfronts are proposed or existing are to be altered the Council will seek to ensure that:

- 1) shopfronts are well designed and should have proportioned, and interesting facades, with displays and interiors open to view to provide visual interest,
- 2) security measures are permeable to allow views through. Blank facades, solid grilles and roller shutters creating dead frontages will not be supported, and
- 3) shopfronts allow for easy access for all.



## Alternative options for shopfront design

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019 and guidance in the National Planning Policy Framework and Planning Practice Guidance.

## Justification for the choice of options and selection of preferred option

### Reasons the alternatives were selected

'No policy' is the only reasonable alternative as no further options were identified.

### Reasons for selecting the preferred option in light of the alternatives

The option to not have a specific policy covering this issue, but to consider planning applications against the NPPF and Planning Practice Guidance, was considered to provide an insufficient level of guidance for the management of development within the borough.

Having considered the evidence, opportunities and policy context within Guildford, the preferred approach as outlined above is considered to represent the most appropriate method of addressing the issue of privacy and amenity in Guildford. The preferred approach aligns most appropriately with national legislation and Local Plan Strategy and Sites 2019 policies and guidance, and most effectively addresses the issues outlined within this Plan.

### Question 17:

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

Do you have any other comments or suggestions?

## Policy D7: Advertisements, hanging signs and illumination

### Issues

- 5.30 Advertising and illumination can have a considerable impact on the quality and appearance of an area and can look unattractive if poorly designed and sited.
- 5.31 However, it is also recognised that advertisements can have economic benefits, and that well designed and carefully located advertising and signage, including lighting and illumination, can contribute to the vibrancy of commercial areas. All advertisements must respect their context and have suitable regard to amenity and public safety, visual clutter, dominance on the area or impact on the skyline due to their height or design. Within the historic setted section of Guildford's High Street, the Council will continue to resist hanging signs on heritage buildings and will seek to resist illumination in this sensitive area.
- 5.32 The Council's preferred policy option sets out how the council can ensure appropriate design of advertisements and illumination within the borough.

### Preferred option for advertisements, hanging signs and illumination

Proposals for advertisements will need to comply with the following:

- 1) new advertisement and signage on or within the curtilage of a listed building must demonstrate that it would not result in adverse harm to the integrity of the building's design, historical character, structure or setting. The scale, colour, materials and detailing must be sympathetic to the character of the listed building, and must not detract from or conceal any features of significance. Projecting hanging signs will be resisted in the historic cobbled section of the High Street where it would adversely impact on heritage assets and their setting,
- 2) within a Conservation Area new advertisement and signage will be permitted where it can be demonstrated that it would not result in adverse harm to the integrity of the building's structure and design, historical character and setting. Signage should be sensitive to the character of the area, visually unobtrusive, well designed, well located and should not create access issues. The quantity of advertisement is to be kept to the minimum necessary to identify the building and its function,
- 3) there will be a presumption against proposals for internally and/ or externally illuminated fascia and hanging signs unless it can be demonstrated that the premises rely principally on trading after dark. Illumination of shop front fascia's and signs will be resisted in the historic setted section of Guildford High Street,

- 4) be of high-quality design, sensitive to the visual appearance of the building, the surrounding street scene, and views, and having regard to the significance of designated heritage assets and their setting,
- 5) be appropriate to and relevant to the business or premises on which it relates,
- 6) it does not contribute to unsightly proliferation or clutter of signage in the vicinity,
- 7) it does not create a hazard to pedestrians or road users, and
- 8) it does not cause visual intrusion through light pollution.

### **Alternative options for advertisements, hanging signs and illumination**

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant guidance.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

#### **Reasons for selecting the preferred option in light of the alternatives**

The option to not have a specific policy covering this issue, but to consider planning applications against the NPPF and Planning Practice Guidance, was considered to provide an insufficient level of guidance for the management of development within the borough.

Having considered the evidence, opportunities and policy context within Guildford, the preferred approach as outlined above is considered to represent the most appropriate method of addressing the issue of privacy and amenity in Guildford. The preferred approach aligns most appropriately with national legislation and Local Plan Strategy and Sites 2019 policies and guidance, and most effectively addresses the issues outlined within this Plan.

### **Question 18:**

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

Do you have any other comments or suggestions?

## Topic - Public Realm

### Issues

- 5.33 The public realm includes all publicly accessible space between buildings, whether public or privately owned and includes alleyways, streets and open gardens. Some internal spaces can also be considered as part of the public realm such as shopping malls, station concourses and public buildings. The public realm should be considered as a series of connected routes and spaces that help to define the character of a place and enable navigation through the built form.
- 5.34 Good quality public realm is important in creating vibrant areas in which people want to live and work and helps to increase economic prosperity. The public realm contributes considerably to a sense of place and the overall attractiveness of the borough. Poor public realm due to the dominance of the car, poor quality street furniture and proliferations of clutter create unattractive and difficult to navigate areas and can add to perceptions of poor safety.
- 5.35 Places should be distinctive, attractive, legible and accessible, and of the highest design and built quality enabling movement through the built form, as well as opportunity for people to meet, congregate, socialise and appreciate quiet enjoyment. The use and function of spaces within them should inform their appropriate design and management.
- 5.36 Public realm within the Borough will be expected to be of high quality in its design and the materials used, sustainable, robust and user friendly for all to create attractive environments and spaces where people want to be, to contribute to and assist in the establishment of healthy, safe and cohesive communities.
- 5.37 A number of public realm projects are in progress within the Town Centre and will be coming forward as part of current and future developments.
- 5.38 A public realm policy will focus on improving access to places people wish to visit or pass through and can assist in regeneration and inward investment from development and the Council's own projects.
- 5.39 Public Art – the Council will seek to encourage the provision of high-quality public art which can be positive and enhancing and can help to create distinct character to places and spaces. It can also be controversial, and there are a number of important issues that need to be considered in its provision such as long-term future care, maintenance and costs, and who owns public art in our public spaces for example. For these reasons applications for new art should be assessed and considered through the Council's art strategy and the Council's preferred policy option for the public realm in order to ensure positive outcomes.

## Policy D8: Public Realm

### Preferred option for public realm

#### General principles

The Council's objectives will require new public realm projects to:

- 1) be informed by their context including the area's distinctive qualities, identity, topography and opportunities of the relevant places within the Borough,
- 2) be of high quality in terms of design and materials used, sustainable, robust and user friendly for all, and create varied and attractive environments and spaces where people want to be, and to contribute to,
- 3) enhance connectivity for pedestrians and cycle movement,
- 4) provide views and focal points to enable ease of access and legibility to places people wish to visit,
- 5) provide opportunity for flexible multi-use community spaces,
- 6) provide opportunity for charging points,
- 7) be appropriately maintained for the long term, and
- 8) provide opportunity for on street dining where it relates to the business use, comprises of moveable furniture, and does not obstruct pedestrian routes.

#### Public Art

Public art can contribute considerably to the quality of the environment when it is well considered, designed and appropriate. The Council will only permit development for an artwork, statue or memorial where a proposal has been:

- 9) considered and assessed against the Council's Art Strategy
- 10) responds appropriately to its context, contributes to community engagement and ownership and where the future care and maintenance are secured.

### Alternative options for public realm

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant guidance.

## **Justification for the choice of options and selection of preferred option**

### **Reasons the alternatives were selected**

Alternative options have been considered in order to provide a comparative analysis in terms of their ability to meet legal requirements and the issues identified in the Local Plan. The alternative option identified above represents the reasonable alternative that is both a realistic, deliverable option and is sufficiently distinct from the preferred option to enable comparison.

### **Reasons for selecting the preferred option in light of the alternatives**

The option to not have a specific policy covering this issue, but to consider planning applications against the NPPF and Planning Practice Guidance, was considered to provide an insufficient level of guidance for the management of development within the borough.

Having considered the evidence, opportunities and policy context within Guildford, the preferred approach as outlined above is considered to represent the most appropriate method of addressing the issue of privacy and amenity in Guildford. The preferred approach aligns most appropriately with national legislation and Local Plan Strategy and Sites 2019 policies and guidance, and most effectively addresses the issues outlined within this Plan.

The preferred option has been also informed by the initial results of the Sustainability Appraisal. The results of the assessment suggest that the preferred option, in comparison with other reasonable alternative, offers greater sustainability benefits across three elements of SA (social, economic and environmental), therefore presenting the most sustainable solution and biggest net improvements compared with the current situation.

### **Question 19:**

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

Do you have any other comments or suggestions?

## Topic - Residential intensification

### Issues

- 5.40 Residential intensification comprises schemes that either result in a net increase in residential units or involve the redevelopment of existing units. Intensification can provide a positive source of new residential development and make a valuable contribution to housing supply. However, it also brings challenges in terms of good design, place making and integration. These challenges can vary across the borough depending on the characteristics and context of local areas. Within the urban areas high quality schemes will assist with making best use of land, steering new development to sustainable locations and delivering housing. However, this should not be to the detriment of particular characteristics of those areas, nor introduce isolated pockets of development which do not integrate with their surroundings.
- 5.41 Outside of the urban areas there are different challenges from intensification. Villages which are now inset from the Green Belt are identified as having the potential to contribute to housing delivery through allocated sites and additional windfall development. As well as following general good design principles, residential intensification schemes in villages should ensure they do not result in inappropriate densities, forms and patterns of development. Often parts of a village outside of a core area of development will become more loose knit as it transitions towards the edge of a village into open countryside. Villages often have a sporadic development feel and are less 'planned' due their historic and 'ad hoc' development. Development should not unduly erode this and should also seek to respect the characteristics of those village areas.

### Policy D9: Residential Intensification

- 5.42 The Council's preferred approach is to include policy that enables residential intensification that respects the characteristics of the area. This is set out below.

#### Preferred option for residential intensification

The aim of this policy is to identify design principles that will apply to residential intensification schemes, with further specific points for villages inset from the Green Belt:

- 1) Residential intensification within the borough should follow good design principles set out in the National Design Guide, elsewhere in this Plan and as appropriate within Neighbourhood Plans. Additionally, the policy will require that schemes:
  - a) Make the best use of land,
  - b) Establish or enhance a sense of place, avoiding isolated and piecemeal development and using innovative design approach where appropriate,

- c) Proposals involving 'back-land' development must avoid long, narrow and isolated access points, such developments should create a positive 'street' entrance establishing a sense of identity and encouraging pedestrian and cycle traffic into and out of the site,
  - d) Schemes should demonstrate that relationships with both existing neighbouring development and buildings/gardens within the site are acceptable taking into account back to back or back to front distances are appropriate. The privacy of existing and proposed residential areas should also be respected by any new layout,
  - e) To ensure proposals come forward in an integrated manner designs should ensure landscaping measures, parking, refuse storage and collection facilities are all planned at the outset and relate well to the buildings within the site,
  - f) Where the Council considers that land has come forward which could be incorporated into a more comprehensive scheme it will require appropriate infrastructure contributions from individual proposals which may be lower than the normal thresholds. Contributions will be based on a level of development across the comprehensive area which the Council considers appropriate,
- 2) Additionally, within villages areas now inset from the Green Belt, proposals should:
- a) Respect the surrounding grain of development
  - b) Introduce development forms which reflect the character and context of the village
  - c) Avoid layouts that are overly formalised where surrounding village patterns are organically driven
  - d) Ensure that the transitional character of edge of village/settlement areas is not lost and that hard urban forms are not introduced in semi-rural environments
  - e) Encourage pedestrian/cycle links to key village facilities

### **Alternative options for residential intensification**

- 1) To not have a separate policy dealing with this matter, to rely on guidance with the National Design Guide and other design policies within the Local Plan or neighbourhood plans.



## **Justification for the choice of options and selection of preferred option**

### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

### **Reasons for selecting the preferred option in light of the alternatives**

The option to not have a specific policy covering this issue, but to consider planning applications against the NPPF and Planning Practice Guidance, was considered to provide an insufficient level of guidance for the management of development within the borough.

Having considered the evidence, opportunities and policy context within Guildford, the preferred approach as outlined above is considered to represent the most appropriate method of addressing the issue of privacy and amenity in Guildford. The preferred approach aligns most appropriately with national legislation and Local Plan Strategy and Sites 2019 policies and guidance, and most effectively addresses the issues outlined within this Plan.

## **Definitions**

### **Back-land development:**

Development of 'landlocked' sites either behind existing buildings or on land between the built up area of a settlement and the open countryside. Such sites often have no street frontages.

### **Question 20:**

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

Do you have any other comments or suggestions?

## Topic - 'Agent of Change' and Noise Impacts

### Issues

- 5.43 The National Planning Policy Framework (NPPF) sets out that local plans should:
- ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs)<sup>80</sup>.*
- 5.44 In delivering this objective, national policy clarifies that:
- existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed<sup>81</sup>.*
- 5.45 Published in February 2019, the revised NPPF introduced the 'Agent of Change' principle within national planning policy. This principle sets out that the responsibility for the mitigation of the impact of noise and other nuisance activities on the proposed new development (or the 'agent of change'). As such, development proposed in the vicinity of existing businesses, community facilities or other activities may need to put suitable mitigation measures in place to avoid those activities having a significant adverse effect on residents or users of the proposed scheme<sup>82</sup>. Further guidance on the 'agent of change' principle is also set out in Planning Practice Guidance<sup>83</sup>.
- 5.46 Prior to the introduction of the 'agent of change' principle, businesses or activities considered to be generating significant adverse noise impacts were responsible for the management and mitigation of that impact, regardless of the length of time that business or activity had been operating in the area. In many cases across the country, this situation provided for inappropriate developments to be established in areas where significant noise impacts would be endured by the prospective residents as noise mitigation was a limited consideration in the design of the proposal. This has led to numerous examples of complaints from newly-arrived residents about the noise from nearby existing noise-generating businesses or activities, even at times forcing the existing business to close down.
- 5.47 Similar concerns have been experienced in Guildford borough recently, with the example of complaints over noise from live music venues in the town centre. In sensitively managing future development, the articulation of an appropriate 'Agent of Change' principle for the Guildford context will ensure that well-designed, effectively integrated development is delivered.

---

<sup>80</sup> NPPF Paragraph 182.

<sup>81</sup> NPPF Paragraph 182.

<sup>82</sup> PPG Paragraph 009. Reference ID: 30-009-20190722.

<sup>83</sup> Available online at: <https://www.gov.uk/guidance/noise--2>.

- 5.48 Noise-generating uses, including cultural venues such as theatres, concert halls, pubs and live-music venues are an instrumental component of the experience that Guildford offers and should be both celebrated and protected (see Policy ID8: Community Facilities). As previously noted, the effective integration of 'noise-sensitive' development, such as residential uses, with Guildford's cultural offer will require a sensitive approach. 'Noise-sensitive' development in locations likely to be affected by noise levels with an observed adverse effect should be designed and implemented in order to avoid and mitigate those noise impacts for the residents to ensure that established cultural venues remain viable and can continue their present business without the increased prospect of licensing restrictions or threat of closure due to noise complaints from neighbours.
- 5.49 The 'Agent of Change' principle clearly sets out that the responsibility for the mitigation of the impact of noise and other nuisance activities lies with the proposed new development (or 'agent of change'). Where new 'noise-sensitive' developments are proposed near existing 'noise-generating' uses or activities, applicants will be required to demonstrate that the proposed development is designed sensitively, in order to protect the prospective occupiers from noise impacts. The applicant should demonstrate how the proposal will be designed to avoid or mitigate these effects through the submission of a Noise Impact Assessment at the time of the application. Appropriate design measures will be judged as appropriate or otherwise on a case-by-case basis, but should include measures outlined in Planning Practice Guidance<sup>84</sup> and accepted good acoustic design principles as a starting point.
- 5.50 Residential and other noise-sensitive development proposed near to existing noise-generating uses should include measures necessary to avoid noise levels that have a Significant Observed Adverse Effect and mitigate to a minimum any noise levels that cause the Lowest Observed Adverse Effect, in line with the Noise Exposure Hierarchy<sup>85</sup>. This will ensure that new development has effective acoustic design and sound insulation to mitigate and minimise potential noise impact or neighbour amenity issues. Avoidance and mitigation measures should be explored at an early stage in the design process, with necessary and appropriate provisions secured through planning obligations or conditions.
- 5.51 Importantly, the 'Agent of Change' principle is applied in both directions. If a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the responsibility for the mitigation of noise impacts is on the proposed agent of change to ensure its development or activity is designed in such a way as to protect existing users or residents from the likely noise impacts. The applicant must demonstrate how the development will be designed and implemented to effectively avoid and mitigate any potential adverse noise impacts caused by the proposed development.

---

<sup>84</sup> See PPG: Paragraph 010 Reference ID: 30-010-20190722.

<sup>85</sup> Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/820957/noise\\_exposure\\_hierarchy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/820957/noise_exposure_hierarchy.pdf).

- 5.52 Where proposed 'noise-sensitive' and 'noise-generating' development is suspected of experiencing or generating potential adverse noise effects, a Noise Impact Assessment (NIA) should be submitted with the planning application. NIA should be carefully tailored to local circumstances in order to fully demonstrate the potential noise impact either experienced or generated by the proposed development. The applicant must demonstrate how the proposal is designed and implemented in order to effectively avoid or mitigate the potential adverse noise impacts.
- 5.53 Some permitted development, including change of use from office to residential, requires noise impacts to be taken into consideration by the Local Planning Authority as part of the prior approval process. Boroughs must take account of national planning policy and guidance on noise, and therefore the Agent of Change principle would apply to these applications.

### Policy D10: 'Agent of Change' and Noise Impacts

- 5.54 The Council's preferred approach is to ensure that new development can be integrated effectively with existing businesses, community facilities and 'noise-sensitive' uses such as residential uses, by developing a policy that articulates the 'agent of change' principle for the context of Guildford. This is set out below.

#### Preferred option for 'agent of change' and noise impacts

The aims of this policy could be secured by having a policy that:

Supports the development of 'noise-sensitive' and 'noise-generating' uses where proposals accord with the NPPF, but requires that:

- 1) planning applications for the development of noise-sensitive uses should consider their proximity to noise-generating uses. Applications for noise-generating uses should also consider their proximity to noise-sensitive uses. Where appropriate, applications should include a Noise Impact Assessment, which considers this relationship and the impact of any potential noise impacts either on or from the proposed development<sup>86</sup>. Applicants must clearly identify the likely effect levels from, or on, existing uses nearby to the proposed development as a result of the proposal, including the potential adverse effect that they may have on the new and existing residents or users.

<sup>86</sup> Noise Impact Assessments should be produced by an independent, suitably qualified individual, tailored for local circumstances, and carried out to industry best practice guidelines at the time of the application.

- 2) where evidence of potential Adverse Noise Effect Level impact exists<sup>87</sup>, the applicant must demonstrate how the proposed development will be designed and implemented in order to;
  - a) Prevent any present and very disruptive Significant Observed Adverse Effect levels,
  - b) Avoid any present and disruptive Significant Observed Adverse Effects, and
  - c) mitigate effectively any present and intrusive Lowest Observed Adverse Effect levels.

if the application site cannot be designed and implemented to fully prevent, avoid and mitigate potential Adverse Noise Effect impacts as appropriate, the applicant should explore whether the existing development has potential to be adapted without adversely affecting the existing operation.
- 3) applicants must demonstrate how the proposal has been designed and will be implemented in accordance with good acoustic design principles both externally and internally<sup>88</sup>, demonstrating that they have avoided creating or maintaining pathways of impact between sources of sound nuisance and sensitive receptors.
- 4) as the 'agent of change', the applicant is responsible for ensuring the likely adverse noise effects are identified and all relevant appropriate measures to manage the effects are implemented. This includes any measures required to be undertaken to the noise-generating use as a result of proposals for noise-sensitive uses, where necessary.
- 5) where there is likely to be an unacceptable impact on either proposed or existing noise-sensitive uses, which cannot be prevented or adequately mitigated, planning permission is likely to be refused.

**Noise-sensitive uses**

- 6) noise-sensitive development should be designed to ensure that noise-generating venues and uses remain viable without unreasonable restrictions being placed on them.
- 7) proposals should be designed to reduce the impact of noise from adjoining activities or the local environment; incorporating appropriate noise barriers and optimising the sound insulation provided by the building envelope.

<sup>87</sup> As defined within the Noise exposure hierarchy table, available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/820957/noise\\_exposure\\_hierarchy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/820957/noise_exposure_hierarchy.pdf)

<sup>88</sup> Section 5 of BS 8223:2014 provides guidance on how best to achieve this.

- 8) proposals should ensure that any potential noise impacts are mitigated wherever possible, using measures such as those provided in Planning Practice Guidance<sup>89</sup>, including by providing relatively quiet amenity areas or facades (containing windows to habitable rooms) as part of each dwelling.

#### **Noise-generating uses**

- 9) new noise-generating development (such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues) proposed close to residential and other noise-sensitive development should put in place measures such as soundproofing to mitigate and manage any noise impacts for neighbouring residents and businesses.
- 10) particular consideration should be given to the potential effects of noisy development on international, national and locally designated sites of importance for biodiversity.

### **Alternative options for 'agent of change' and noise impacts**

- 1) To not have a specific policy covering this issue but to consider planning applications against the NPPF and Planning Practice Guidance.
- 2) To develop a policy that articulates the 'Agent of Change' principle but does not extend to the management of noise impacts.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the options were selected**

Alternative policy options have been considered in the process of developing the Council's approach to the management of development potentially affected by adverse noise effects (whether noise-sensitive or noise-generating). The alternatives outlined above represent the reasonable possible approaches that are both realistic and deliverable, in addition to being sufficiently distinct as to provide an appropriate basis to assess their merits. They have been developed in order to help provide a comparative assessment of the relative benefits of the various potential approaches to addressing the identified issues, meeting legal requirements, and delivering national priorities.

---

<sup>89</sup> See PPG Paragraph 011 Reference ID: 30-011-20190722.

### **Reasons for selecting the preferred option in light of the other options**

The option to not have a specific policy covering this issue, but to consider planning applications against the NPPF and Planning Practice Guidance, was considered to provide an insufficient level of guidance for the management of development that may be affected by noise impacts within the borough. National policy provides broader guidance for this issue area and it was considered appropriate that additional details were provided in order to clarify how the national guidance should be applied for Guildford's context.

Having considered the evidence, opportunities and policy context within Guildford, the preferred approach as outlined above is considered to represent the most appropriate method of addressing the issue of contaminated land in Guildford. The preferred approach aligns most appropriately with national legislation and Local Plan Strategy and Sites 2019 policies and guidance, and most effectively addresses the issues outlined within this Plan.

### **Definitions**

#### **Pathway of impact:**

the route through which the potential adverse noise and other nuisance effects reach the receiving sensitive receptor; such as through air, ground or water.

#### **Sensitive Receptors:**

Living organisms that are sensitive to adverse noise and other nuisance effects, such as people, other organisms and the natural environment.

**Source:** The origin of potential adverse noise and other nuisance effects.

### **Question 21:**

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

Do you have any other comments or suggestions?

## Topic - The Corridor of the River Wey and the Guildford and Godalming Navigation

### Issues

- 5.55 The historic significance of the Navigation as one of the earliest schemes to enhance the navigation of natural rivers must be protected. The River Wey and the Navigations are of considerable local importance and environmental sensitivity, providing opportunities for informal recreation, learning and enjoyment. They have had significant influence on local history, commerce, townscape and landscape and in Surrey's wider heritage. The significance of the River Wey, its corridor and navigation must be respected in all developments that might affect its varying character.
- 5.56 The Council recognises the need to protect and enhance the corridor of the River Wey and the Godalming navigation but also seeks to take opportunities where appropriate to enhance the use of the river in the town, including how development can be sensitively integrated towards the river to avoid it turning its back to it, and for its enjoyment and appreciation.
- 5.57 Key sites alongside the river need to respond to the varying character of the river and navigation which runs through the town, through meadows on the edge of the town and before it transitions to its more rural countryside character beyond. Development opportunities along the river must respect and respond sensitively to the river and its waterways and the varying character which must be retained. The special character of the landscape and townscape in the corridor must be protected or improved as well as views both within and from the corridor.
- 5.58 Different types of design will be needed for development sites close to the river that are sensitive to and reflect the varying urban and rural settings along its course. The Council will seek opportunity for improved public links and connection to and along the river both to improve accessibility and amenity.
- 5.59 The Council recognises that any future proposals for flood defence works may go beyond our borough boundary and must be considered as part the navigation as a whole. We will work with stakeholders to address flooding issues whilst safeguarding the character, visual setting, amenity, ecological value and architectural and historic interest of the River Wey and its Navigation.
- 5.60 The Council's preferred option below sets out how it will seek to protect and enhance the Corridor of the River Wey and the Guildford and Godalming Navigation.



## Policy D11: Corridor of the River Wey and Guildford and Godalming Navigation.

### Preferred option for the corridor of the river Wey and Guildford and Godalming Navigation

The Council's objective is to protect or enhance the special character of the River Wey and the Guildford and Godalming Navigations, especially their visual quality, setting, amenity, ecological value, architectural and historic interest, views within from the corridor, and the Nature Conservation value of the site. It will undertake this by having a policy that;

- 1) seeks a high quality of design, both sensitive to and appropriate to, the context and function, and the special historic interest, of the river, its navigation and landscape. High quality design will be expected on all sides fronting, or in the vicinity of the river Wey, or affecting its setting,
- 2) requires developments to seek to provide publicly accessible riverside walkways and/or cycle routes to enhance the vitality of the riverside,
- 3) requires improvement of access to and from the river itself by foot, bicycle and/or boats,
- 4) requires riverside developments to secure improvements to existing landscaping and provide new native planting schemes and that contribute to the biodiversity of the riparian environment, and
- 5) ensures that sensitive levels of lighting are used to retain existing character and to protect amenity, natural habitats and night sky.

### Alternative options for the corridor of the river Wey and Guildford and Godalming Navigation

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019 and guidance in the National Planning Policy Framework and Planning Practice Guidance.

## **Justification for the choice of options and selection of preferred option**

### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

### **Reasons for selecting the preferred option in light of the alternatives**

The option to not have a specific policy covering this issue, but to consider planning applications against the NPPF and Planning Practice Guidance, was considered to provide an insufficient level of guidance for the management of development within the borough. National policy provides broader guidance for this issue area and it was considered appropriate that additional details were provided in order to clarify how the national guidance should be applied for Guildford's context.

Having considered the evidence, opportunities and policy context within Guildford, the preferred approach as outlined above is considered to represent the most appropriate method of addressing the issue of privacy and amenity in Guildford. The preferred approach aligns most appropriately with national legislation and Local Plan Strategy and Sites 2019 policies and guidance, and most effectively addresses the issues outlined within this Plan.

### **Question 22:**

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

Do you have any other comments or suggestions?

## Climate Change and Sustainability

### Introduction

5.61 The global climate is changing with rising temperatures, rising sea levels, changes to rainfall patterns and the lengths and timings of seasons and increases in the frequency and severity of extreme weather events. Continued emission of greenhouse gases (GHGs), including carbon dioxide, will cause further warming and long-lasting changes in all components of the climate system, increasing the likelihood of severe, pervasive and irreversible impacts for people and ecosystems<sup>90</sup>. The South East of England is likely to face significant challenges from a changing climate and changing weather patterns throughout the plan period and beyond.

### Climate change mitigation

5.62 Reducing greenhouse gas emissions is key to limiting the impacts of climate change, and action will need to take place at a range of levels; global, national and local. At a local level, the local plan can ensure that new developments are designed to produce fewer GHG emissions and can also enable retrofit improvements to existing developments to reduce their emissions.

5.63 To improve sustainability and effectively tackle the causes of climate change, development will need to adopt innovative design and construction practice that delivers energy efficient and low impact homes and other buildings. Constructing buildings that are energy efficient and supplied by low or zero carbon energy technologies can reduce operational carbon emissions but can also improve energy security and reduce fuel poverty for householders.

5.64 Fuel poverty is caused by a combination of high domestic energy consumption and poor energy affordability in low income households. In our borough, 9.1 per cent of households are in fuel poverty (around 5,100 households), the highest level in Surrey and slightly higher than the average for the South East. Fuel poverty presents a significant risk to human health and life; fuel poverty is estimated to have contributed to 5,500 excess winter deaths in 2017/18 in England and Wales, and is particularly concentrated in households that rent privately<sup>91</sup>.

5.65 The buildings we build today are likely to be with us into the next century, so the benefits of building adaptable and efficient developments will last a long time. As such, it is appropriate now for future development to aim to be zero carbon and for all developments to reduce their carbon dioxide emissions as far as possible.

---

<sup>90</sup> 5<sup>th</sup> Annual Report, Intergovernmental Panel on Climate Change (2014).

<sup>91</sup> State of the Market (Ofgem, 2019).

### **Climate change adaptation**

- 5.66 Mitigation alone will not be adequate to address the issue of climate change. Weather patterns and the climate are already changing and will continue to do so for the foreseeable future, so it is important that new developments are suited to current and future climate conditions; new buildings should be comfortable to inhabit for their lifetime to avoid the need for retrofitting or replacement further down the line.

### **National policy context**

- 5.67 The Climate Change Act 2008 (as amended) sets a legally binding target to bring all GHG emissions to net zero by 2050. It also provides for the Committee on Climate Change to set out binding carbon budgets for 5-year periods. The first three carbon budgets aimed to achieve a 34 per cent reduction by 2020.
- 5.68 Section 19(1A) Planning and Compulsory Purchase Act 2004 stipulates that development plan documents must (taken as a whole) include policies designed to ensure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.
- 5.69 The NPPF (paragraphs 8, 20, 148 -154 and 157) requires us to make a significant contribution to tackling climate change and supporting the transition to a low carbon future, taking full account of flood risk and coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. The planning system is required to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, promote the reuse of existing resources, including the conversion of existing buildings and support renewable and low carbon energy and associated infrastructure. Policies are required to support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, promote walking, cycling and public transport, provide a positive strategy for the supply of renewable and low carbon energy and heat by identifying sites for energy infrastructure and potential customers.
- 5.70 Further guidance on climate change impacts is also set out in the PPG. It states that addressing climate change is one of the core land use planning principles that the NPPF expects to underpin both plan-making and decision-taking and that, in order to be found sound, Local Plans will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008, and to co-operate to deliver strategic priorities that include climate change. Spatial planning should support the delivery of appropriately sited green energy and influence the emission of greenhouse gases.
- 5.71 Planning Practice Guidance advises how planning can identify suitable mitigation and adaptation measures in plan-making and planning applications to address the potential impacts of climate change. It sets out the importance of good design and layout which promotes the efficient use of natural resources and passive solar design.

- 5.72 The government's Design Guide (2019)<sup>92</sup> echoes established good practice on development for climate change. It states that well-designed places and buildings:
- mitigate climate change, primarily by reducing greenhouse gas emissions by minimising energy need through design and energy efficient materials and meeting residual energy need from low carbon sources in line with the energy hierarchy,
  - minimise embodied energy and carbon through the use of low carbon materials and the reuse of existing buildings,
  - are fit for purpose and adaptable over time, reducing the need for redevelopment and offering resilience to prevailing and forecast environmental conditions, with regard to overheating and the 'heat island' effect,
  - use innovative techniques and smart technologies including off-site manufacture of buildings and components and digital infrastructure, where appropriate.
  - include green and blue spaces that help to cool built areas and provide flood alleviation, and
  - conserve water through rainwater harvesting or grey-water systems.

#### **National standards**

- 5.73 Standards for energy efficiency and carbon emissions in new buildings are governed by the building regulations regime, which is a separate process to the planning system. However, some local planning authorities (including Guildford Borough Council) have introduced their own standards for new buildings that are higher than the standards in building regulations in terms of energy efficiency and/or carbon emissions.

#### **National zero carbon homes standard (cancelled)**

- 5.74 In 2006, the government announced that new homes would need to meet a zero carbon standard by 2016, achieved partly by increasing the energy efficiency standards in building regulations and partly through a national planning requirement which would see any remaining emissions removed through the use of low and zero carbon energy or payments into an offsetting scheme. Successive governments worked towards the introduction of zero carbon homes by tightening building regulations standards and developing the planning approach further. In March 2015, the Code for Sustainable Homes (a set of industry standards adopted by many local authorities) was withdrawn by the coalition government to make way for the national zero carbon homes standard. However, following the 2015 change of government, the introduction of the zero-carbon standard was cancelled. Climate change has since risen up the national agenda and in 2019 the current government signalled that it will introduce a new "future homes" national standard by 2025.

---

<sup>92</sup> Available online at: <https://www.gov.uk/government/publications/national-design-guide>.

### **Future Homes standard**

- 5.75 The government consulted on the proposed Future Homes standard in late 2019 and early 2020<sup>93</sup>. The proposal is to change building regulations standards either to reduce carbon emissions by 20 per cent through energy efficiency alone or, the governments preferred choice, to reduce them by 30 per cent through both fabric and low carbon energy. This would be followed up by a further change to building regulations before 2025 that would see a prohibition on the use of gas for central heating, with low carbon heat replacing most of the need for heat (heat networks and heat pumps etc.) leading to a 75-80 per cent reduction in carbon emissions. The prohibition on gas heating is delayed in order to give the supply chain for low carbon heating technologies time to develop. In the run up to the December 2019 general election, the current Prime Minister and Secretary of State for Housing Communities and Local Government stated that they would continue to progress the Future Homes standard if elected. The government will respond to the consultation in due course.
- 5.76 The government is considering whether to commence section 43 of the Deregulation Act 2015 alongside changes to building regulations. Commencing section 43 would result in an amendment to the Planning and Energy Act 2008 that removes the power for Local Authorities to set energy efficiency standards in new development. It would not alter the remainder of the 2008 Act which grants powers to Local Authorities to require developments to provide a proportion of their energy usage from low and zero carbon sources.
- 5.77 The consultation also considered other changes to the building regulation regime including improvements to build quality, improvements to compliance to close the performance gap between developments as-designed and as-built and, changes to airtightness and ventilation standards.
- 5.78 The Council will await the outcome of the consultation and this may impact the development of local plan policy.

### **Improving construction practice**

- 5.79 The construction industry is becoming more sustainable through changing practice. Modular buildings and offsite construction methods have been in existence for a long time, but recent years have seen strong growth. As these construction processes operate under factory conditions, the processes are less wasteful and are typically able to deliver buildings that are much more energy efficient than traditional builds. Construction is quicker, safer, less affected by weather has less reliance on traditional skills which are in short supply, and the end product is generally of a higher and more consistent quality, bringing benefits to both the builder and the customer.
- 5.80 In recent years there has been also growth in the use of less environmentally damaging materials, such as cross-laminated timber and precast concrete high in recycled aggregate.

---

<sup>93</sup> Available online at: <https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings>.

## **Local context, strategies and evidence**

### **Climate change emergency**

- 5.81 In July 2019, the Council joined a number of Councils Governments, including Surrey County Council and five other Surrey districts, in declaring a climate emergency. The motion included a statement that all governments (national, regional and local) have a duty to act to address climate change, a commitment to working with partners establish how and when the borough could become carbon neutral with a target of 2030, and a commitment to work towards making the Council's activities net-zero by 2030.

### **Local Plan: strategy and sites**

- 5.82 The LPSS includes policy D2: Climate change, sustainable design, construction and energy which requires new developments to:
- use mineral resources efficiently,
  - reduce waste and reuse materials,
  - design development to reduce energy and water demand,
  - deliver measures that enable sustainable lifestyles,
  - include adaptations for a changing climate and weather patterns,
  - ensure new buildings are designed to reduce carbon dioxide emissions of at least 20 per cent measured against the relevant Target Emissions Rate in Building Regulations and consider the use of Combined Cooling Heat and Power as a primary energy source where suitable, and
  - be adapted for changing climate and weather and resilient to the full range of expected impacts.

### **Relevant policies in Guildford Borough Local Plan 2003**

- None

### **Relevant policies in Guildford borough Local Plan: strategy and sites 2019**

- Policy D1: Place shaping
- Policy D2: Climate change, sustainable design, construction and energy
- Policy ID4: Green and blue infrastructure

### **Relevant Guildford Borough Council supplementary planning guidance**

- Climate Change, Sustainable Design, Construction and Energy SPD

### **Relevant Guildford Borough Council evidence documents**

- Guildford Renewable Energy Mapping Study (Guildford Borough Council, 2015)
- LPSS Topic Paper 2017 - Environmental Sustainability and Climate Change
- Environmental Sustainability and Climate Change study 2013

### **Relevant Objectives from LPSS**

- Objective 1:** To deliver sufficient sustainable development that meets all identified needs.
- Objective 3:** To ensure that all development is of high-quality design and enables people to live safe, healthy and active lifestyles.
- Objective 7:** To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.



## Topic - Low carbon and low impact development

### Issues

- 5.83 Legislation and national planning policy require the Local Plan to drive reductions in greenhouse gas emissions and promote sustainable development that is adapted to the expected range of climate impacts.
- 5.84 The Local Plan: Development Management policies can help the borough to play its part in achieving national targets for sustainable development and carbon dioxide emissions reduction in line with the Climate Change Act 2008. To achieve this, new developments should use energy efficiently, employ sustainable construction techniques, be designed for a longer useful life and have the ability to evolve with changing lifestyles and home occupation patterns. We should encourage and enable renewable and low carbon energy sources in order to reduce carbon intensity.

### Fabric first and energy hierarchy

- 5.85 The supporting text of Policy D2 sets out the following energy hierarchy:
- 1) Eliminate energy need
  - 2) Use energy efficiently
  - 3) Supply energy from renewable and low carbon sources
  - 4) Offset remaining carbon dioxide emissions
- 5.86 The hierarchy sets out the principle that energy reduction should come before the provision of renewable and low carbon energy sources when reducing carbon dioxide emissions. This is in line with established best practice in energy management and accords with national strategies, such as the Clean Growth Strategy (BEIS, 2017).
- 5.87 Policy D2 (2) requires developments to follow the energy hierarchy but does not specifically state that energy demand reduction through design and fabric efficiency should be prioritised over low carbon energy.
- 5.88 Policy D2 (9) requires new buildings to achieve a carbon dioxide emissions standard that is 20 per cent lower than the relevant building regulations standard through improvements to the energy performance of the building (low energy design and efficient fabric) and the provision of low carbon and renewable energy technologies. However, except for the requirement to follow the energy hierarchy, it leaves the mix of energy reduction and energy provision to the applicant.
- 5.89 A 'fabric first' approach to carbon emission reduction involves maximising the performance of the components and materials that make up the building fabric itself, before considering the use of renewable and low carbon energy technologies. This will reduce operational costs for building occupants, improve energy efficiency and reduce carbon emissions. A fabric first method can also reduce the need for maintenance during the building's life.

5.90 Buildings designed and constructed using the fabric first approach aim to minimise the need for energy consumption through methods such as:

- maximising air-tightness,
- using high levels of insulation,
- optimising solar gain through the provision of openings and shading,
- using thermal mass to store warmth from warmer parts of the day or year, and
- retaining energy from occupants, electronic devices, cookers and so on.

5.91 There are good reasons for prioritising better building performance over provision of renewable and low carbon energy. Renewable and low carbon energy systems:

- may still produce some carbon emissions,
- may not be used effectively by the building occupants,
- may be removed from a building, or may not be replaced when they come to the end of their lives, and
- often require more upkeep and maintenance than design and fabric measures.

5.92 Additionally, it can be difficult to retrofit energy efficient design or fabric to completed buildings, so if energy efficiency is not addressed at the design and construction stages the opportunity to benefit from those measures may be lost. Should occupants of a building wish to reduce their carbon dioxide emissions to zero (e.g. through the use of low and zero carbon energy), it will be much easier to do so if the starting point is an energy efficient building.

5.93 The Council's Environmental Health team is obliged to step in and take action where homes and other buildings become unsuitable for habitation and present a risk to health. The main reasons why the Council takes action are excess damp and excess cold. These issues can be addressed through energy efficient design and well-designed ventilation. Improving energy efficiency will also reduce fuel poverty (see 5.63).

### **Embodied carbon**

5.94 Carbon emissions can result directly from the operation of building services (e.g. lighting, cooling, heating and hot water) as well as the operation of appliances within a building. These emissions are often termed "operational" or "direct" carbon or emissions. Operational carbon emissions from building services are covered by the Building Regulations, and there is established methodology for calculating emissions from other operational sources.

5.95 A building's carbon emissions can also result from indirect sources, such as the energy used to extract, grow or manufacture building materials, to transport materials and people involved in construction, and the energy used during construction. These emissions are often referred to as "embodied carbon". As the operational carbon produced by buildings falls due to improving energy efficiency standards and a decarbonising energy supply, addressing embodied carbon emissions is likely to become more and more critical if carbon emissions are to continue to fall.

- 5.96 Embodied carbon is not addressed by the building regulations. Policy D2 seeks to contribute to the delivery of low carbon energy and building services, but does not address embodied carbon.
- 5.97 Information on the embodied carbon present in building materials is available from a number of sources:
- The Building Research Establishment (BRE) has produced the Green Guide to Specification which rates materials from A+ to E for environmental impact including climate change. Alongside this it provides the Green Guide Calculator which sets a methodology for calculating the impact of materials not yet rated and an online database for searching for products.
  - Circular Ecology has produced the Inventory of Carbon and Energy (ICE) database which establishes the embodied carbon content of different building materials.
  - It is expected that some producers and suppliers of building materials will start to include carbon ratings within their brochures as embodied carbon moves up the agenda.
- 5.98 Demolition and rebuilding, and even refurbishment and retrofitting, create carbon emissions and if buildings are designed to accommodate a variety of uses these emissions can be reduced or avoided when the use is changed. For example, new buildings for student accommodation should be able to accommodate other types of residential, and potentially even non-residential, uses in case the need for student accommodation falls in the future.

**Construction waste and efficient use of resources**

- 5.99 Resource efficient and low impact construction has a key role to play in mitigating the impact of development on the environment, society and economy. It is therefore important that all stages of development, right through to the end of life deconstruction, are considered using a 'circular economy' approach. Policy D2 requires the efficient use and recycling of mineral resources, waste minimisation and reuse of demolition and excavation material. As well as protecting natural resources, resource efficiency helps to reduce the embodied carbon that results from the production and transportation of new materials and, where materials are reused on site, the carbon emissions created while transporting waste away from the site.
- 5.100 Policy D2 requires the submission of a sustainability statement for major development and sustainability information for non-major development. Both must include information about how materials will be used efficiently and how waste will be avoided. The Council is producing an SPD that sets out guidance on the information that should be provided.
- 5.101 There is an opportunity to provide further detailed policy on resource efficient development through a detailed Local Plan: Development Management policy that further supports the efficient use of resources to minimise waste.

- 5.102 Historically, better construction waste management has been achieved through the use of Site Waste Management Plans (SWMP). SWMPs are documents produced before work begins and updated throughout the construction project. They govern the management of building materials and waste, recording and confirming how materials are reused, recycled or disposed of. By recording routes of disposal, SWMPs also helped to prevent fly-tipping and other forms of illegal or irresponsible disposal.
- 5.103 From 2008, regulations<sup>94</sup> required SWMPs for all projects of £300,000 or above, with further additional requirements for projects of £500,000 or above. SWMPs had to be provided before work could start. While the regulations were repealed in 2013, some authorities have continued to require them in certain circumstances in order to promote environmental responsibility in construction. Guildford Borough Council usually requires SWMPs where large amounts of waste would result from a development. However, a wider use of SWMPs could help to drive resource efficiency and to deliver the provisions of D2 that apply to waste and resources.
- 5.104 Applying 10 years of inflation to the figures of £300,000 and £500,000 gives values of around £400,000 and £670,000 respectively.

#### **Water efficiency**

- 5.105 Water resources are renewable but not unlimited, and our region is already under severe water stress. Given climate change forecasts and population increases, this situation is likely to worsen.
- 5.106 Policy D2 requires new development to be designed to meet the highest national standard for water efficiency. At present, this means that the “optional building regulation” standard of 110 litres per person per day for new dwellings is in effect (the minimum national building regulation standard is 125 litres per person per day). The policy does not stipulate specific water efficiency measures such as reusing wastewater and employing rainwater harvesting. The optional building regulation of 110 litres per day can be met in new developments through a fittings only approach (i.e. by selecting water efficient taps and toilet cisterns etc.) so adopting the 110 litre standard alone may not drive the uptake of these measures.

---

<sup>94</sup> The Site Waste Management Plans Regulations 2008.

## Policy D12: Sustainable and Low Impact Development

- 5.107 The Council's preferred approach is to include policy that reduces the impact of new development on the environment by driving resource efficiency, low impact construction techniques and energy and water efficiency. This is set out below.

### Preferred option for sustainable and low impact development

The aim of this policy is to provide greater detail to supplement policy D2 where it supports sustainable and low impact development by having a policy that:

#### Energy efficient development

- 1) Introduces an explicit requirement for schemes to follow a low energy design and energy efficient fabric approach<sup>95</sup> to ensure that schemes maximise energy reductions before low carbon and renewable energy technology is considered, in line with the energy hierarchy.

#### Embodied carbon

- 2) Requires schemes to demonstrate that choice of materials has taken account of the need to reduce embodied carbon emissions including by:
  - a) sourcing materials locally where possible to reduce embodied emissions from transport, and
  - b) taking into account the embodied carbon that results from the process of producing materials when choosing them, based on information provided in a respected material's rating database.

This requirement does not apply where specific materials are needed for conservation or heritage reasons.

- 3) Expects developments to consider the lifecycle of buildings and public spaces, including how they can be adapted and modified to meet changing social and economic needs and how materials can be reused or recycled at the end of their lifetime.

---

<sup>95</sup> The 'fabric first' approach should be based upon a consideration of U-values, thermal bridging, air permeability, and thermal mass, and also features that affect lighting and solar gains, such as building orientation and layout.

### **Waste**

- 4) Requires development proposals with an estimated cost of £400,000 or above to be accompanied by a simple Site Waste Management Plan (SWMP) and £670,000 or above to be accompanied by a more detailed SWMP. The SWMP should follow established methodology; setting out how site waste will be managed during construction and that material reclamation, reuse and recycling has been prioritised. This provides additional detail for policy D2(1a & 1b) which requires the efficient use and reuse of mineral resources and waste minimisation. The SWMP should be submitted within or alongside the sustainability statement/sustainability information that is required to be submitted under Policy D2.

### **Water efficiency**

- 5) Expects all development proposals to incorporate measures to harvest and conserve water resources and, where possible, incorporate water recycling/reuse, building on policy D2 (d) which requires new dwellings to meet the highest national standard, currently the “optional requirement” described in Building Regulation 36 2(b)<sup>96</sup>.

## **Alternative options for sustainable and low impact development**

### **Energy efficient development**

To not have a specific policy steering development toward energy efficiency before considering low carbon energy and instead relying on the energy hierarchy and principle of sustainable development set out in policy D2.

### **Embodied carbon**

To not have a specific policy covering embodied and life cycle carbon emissions and instead to rely upon the general principle of sustainable development set out in policy D2.

### **Waste**

To not ask for SWMPs, but instead rely on the requirement in policy D2 for development to minimise waste and reuse materials, judged through information submitted in the sustainability statement or sustainability information. The SPD can set out guidance on what information should be provided that may cover similar ground to an SWMP, but this would not provide a mechanism for schemes to consider their approach to waste throughout.

### **Water efficiency**

To not have a policy supporting the use of water recycling and harvesting in new development.

<sup>96</sup> The optional requirement for water described at 362(b) means new dwellings must be designed so that they use no more than 110 litres per day per occupant.

## **Justification for the choice of options and selection of preferred option**

### **Reasons the alternatives were selected**

The alternatives of 'no policy' are the only reasonable alternatives.

### **Reasons for selecting the preferred option in light of the alternatives**

#### **Energy efficient development**

The Council's view is that it is necessary to supplement Policy D2 by introducing the design and fabric first approach to reducing carbon emissions. While Policy D2 references the energy hierarchy, it does not make the requirement explicit. Therefore, providing a policy will improve clarity.

#### **Embodied carbon**

Embodied carbon is an important issue and is likely to become more significant as operational emissions fall. Policy D2 is largely silent on embodied carbon and, as a detailed matter, it is important to address the issue through development management policy.

#### **Waste**

The Council's view is that SWMPs would be a valuable tool in driving waste reduction and resource efficiency.

#### **Water efficiency**

Water is a critical issue in Guildford borough. While Policy D2 supports water efficiency generally, it does not explicitly address water efficiency measures that could be considered in new developments. Additionally, Policy D2 focuses on national standards which at present only apply to dwellings. Therefore, it is necessary to include a policy to drive water efficiency in non-residential buildings and to broaden the focus toward water efficient design.

### **Question 23:**

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

Do you have any other comments or suggestions?

## Topic - Climate Change Adaptation

### Issues

- 5.108 We expect to face significant challenges from a changing climate and changing weather patterns; hotter and drier summers, warmer and wetter winters, and an increase in heavy rain, storm events and flooding. Rising temperatures and overheating will have significant effects on human health and wellbeing and on the natural environment.
- 5.109 It is important that development is designed for future climate and weather changes and includes adaptations to ensure that the occupants of buildings remain safe and healthy for the lifetime of the new developments, well beyond the plan period.

### Overheating

- 5.110 Overheating of buildings refers to the situation where the internal environment of a building becomes uncomfortably hot. Overheating has already become a problem and it is likely to worsen<sup>97</sup>, the issue is not being adequately addressed at present<sup>98</sup>. The NPPF (paragraph 149) and NPPG explicitly require planning policies to consider overheating.
- 5.111 Overheating is likely to become a more frequent problem because of climate change, but also because of improvements to energy efficiency standards. The Local Plan and modern building regulations standards encourage developers to reduce the carbon emissions from heating through design and construction that allows buildings to be heated passively by the sun. High levels of insulation then mean they lose less heat to the outside environment. These measures can allow the accumulation of warmth over time that causes overheating. Mechanical cooling (air conditioning) is not a good solution for this issue as it uses energy and sometimes can simply displace heat from within the building to other areas (e.g. around the outlet of the cooling unit). Instead, design features can allow passive cooling; for example:
- at certain times of the day, the sunlight entering a building can be reduced through external shading from shuttering and louvres,
  - strategically positioned trees can prevent sunlight entering a building at certain times in the year, and
  - buildings can employ passive ventilation designs and/or ventilation systems that release warm air from the building at certain temperature thresholds.

---

<sup>97</sup> The Committee on Climate Change identifies around 2,000 heat related deaths a year presently (<https://www.theccc.org.uk/2017/08/08/hidden-problem-overheating/>) and projects a rise to more than 7,000 a year from overheating by 2040 (<https://www.theccc.org.uk/2018/01/04/uk-cities-climate-change/>).

<sup>98</sup> Available online at: <https://www.theccc.org.uk/publication/resilience-of-buildings-to-flooding-and-high-temperatures-bre/>.



- 5.112 Overheating can also take place at the wider scale through the urban heat island effect. This refers to a situation where urban areas are substantially warmer than the rural areas surrounding them; up to five degrees warmer in urban areas like Guildford and Ash and Tongham<sup>99</sup>, and it occurs due to the shape of the urban environment and the use of hard, impervious surfaces that are generally dark, so they absorb large amounts of solar energy and trap heat. Breaking up the urban form with natural green and blue features can both reduce heat build-up and allow ambient heat to escape, and urban trees can provide shading that cools surfaces and reduces ambient air temperature through evaporation of water via the leaves. The urban form can be designed to provide cool areas through the shading of streets and public spaces.

### **Rainfall and flooding**

- 5.113 New developments typically introduce impermeable surfaces, which increase the speed and amount of surface water run-off. This can exacerbate flooding and, in extreme cases, lead to flash flood events. Conversely, permeable surfaces and features that store water or slow it down can reduce surface water flooding and help developments become more resilient to the more severe rainfall events likely to result from climate change. These measures also allow water to return to the environment to recharge natural stocks, which can help mitigate the impact of drier summers.

### **Wildfires**

- 5.114 Significant wildfires do occur in the UK and even small fires can have major impacts. UK climate projections indicate that wildfires will become more frequent and more severe.
- 5.115 Multiple wildfires broke out across Surrey in April 2019 with blazes in Worplesdon and Woking after woodland in Camberley caught fire. In both 2003 and 2010, over 800 hectares were burnt causing disruption to key services and infrastructure. Large wildfire incidents within the Thames Basin Heaths (TBH) SPA are regular events.
- 5.116 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 introduced requirements for large scale housing developments to consider risks to human health, cultural heritage or the environment (for example due to accidents or disasters) and the vulnerability of a project to climate change.

### **Policy D2**

- 5.117 Policy D2 (4) sets out a strategic requirement for all developments to be fit for purpose and remain so into the future by incorporating adaptations that avoid increased vulnerability and offer resilience to the full range of expected climate change impacts. It requires adaptation information to be provided in a Sustainability Statement for major development or within proportionate sustainability information for non-major development. It does not set out detail of the measures that should be delivered and does not explicitly cover the health and wellbeing of building occupants.

---

<sup>99</sup> Guildford Environmental Sustainability and Climate Change Study 2013.

## Policy D13: Climate Change Adaptation

- 5.118 The Council's preferred approach is to include a policy that sets out detail regarding climate change adaptation in new development in order that the comfort and wellbeing of building occupants is maintained without the need to resort to future retrofit measures and mechanical cooling. This is set out below.

### Preferred option for climate change adaptation

The aim of this policy is to deliver climate change resilient development by providing further detail to support strategic Policy D2 (4) by having a policy that supports climate change adaptation and identifies the keys issues to be addressed. The policy would include the following measures:

- 1) Buildings are required to be designed and constructed to provide for the comfort, health, and wellbeing of current and future occupiers over the lifetime of the development, covering the full range of expected climate impacts and with particular regard to overheating. Developments likely to accommodate vulnerable people, such as schools and care homes, should demonstrate that their specific vulnerabilities have been taken into account with a focus on overheating.
- 2) Buildings are required to incorporate passive cooling measures and the exclusion of conventional air conditioning wherever possible in line with the cooling hierarchy.
- 3) Schemes are required to minimise the urban heat island effect as far as possible including through:
  - a) choice of materials,
  - b) layout, landform, massing, orientation and landscaping,
  - c) retention and incorporation of green and blue infrastructure
- 4) Schemes are required to demonstrate adaptation for more frequent and severe rainfall events through measures including:
  - d) retaining existing water bodies,
  - e) incorporating new water features (including SuDS),
  - f) designing planting and landscaping schemes to absorb and slow down surface water,
  - g) ensuring SuDS comply with national and county guidance and advice<sup>100</sup>, and
  - h) the use of permeable ground surfaces wherever possible.

<sup>100</sup> Surrey County Council and national guidance can be found on the Surrey County Council website here: <https://www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice/more-about-flooding/suds-planning-advice>.

- 5) Schemes in areas of high risk of wildfire are designed to prevent the spread of fire, taking into account the risk to health and potential damage to significant habitats.

### **Alternative options for climate change adaptation**

To not have a specific policy covering these matters but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019 and to rely on guidance in the National Planning Policy Framework and Planning Practice Guidance. This option relies on the provisions of Policy D2 (4) of the adopted Local Plan Strategy and Sites 2019, which requires proposals for major development to demonstrate how they have incorporated adaptation for a changing climate and changing weather patterns in order to avoid increased vulnerability.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the alternatives were selected**

The only realistic alternative to a detailed policy governing climate change adaptation is to have no policy.

#### **Reasons for selecting the preferred option in light of the alternatives**

The current strategic policy does not set out guidance on what sort of measures should be included in new development in order to adapt to climate change. Therefore, having a detailed development management policy will provide clarity on what is expected.

### **Question 24:**

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

Do you have any other comments or suggestions?

## Topic - Climate Change Mitigation

### Issues

- 5.119 Local Plan policy D2 requires all new homes and large commercial developments in Guildford borough to achieve a minimum 20 per cent reduction in carbon emissions below building regulations standards. This is a strong standard when compared to the vast majority of other district level Local Planning Authorities.
- 5.120 The proposed Future Homes standard (see paragraph 5.75) may deliver either a 20 per cent or, the government's favoured option, a 30 per cent improvement to building regulations carbon emissions standards for new homes. If this improvement is delivered nationally, it may be the case that a local standard is not necessary. Alongside these changes, the government is considering amending the Planning and Energy Act 2008 so that it no longer grants powers to Local Planning Authorities to set energy efficiency standards for homes, which will affect what can be achieved through local planning policy.
- 5.121 The Council has decided not to set out a preferred policy at this (regulation 18) Issues and Options stage and instead wait to see what changes are made to national standards and the building control regime. The outcome will be reflected in the proposed policies included within the proposed submission (regulation 19) Local Plan: Development Management Policies.
- 5.122 If a stronger carbon standard is included in the Local Plan, it will need to be subject to viability testing which will be undertaken during the development of the regulation 19 plan.

## Policy D14: Climate change mitigation

- 5.123 The Council's preferred approach is to not propose a policy at this stage and instead await the outcome of the government's consultation.

### Preferred option for climate change mitigation

To not propose a policy at this stage but to consider policy options once the outcome of the Future Homes consultation is known.

### Alternative options for climate change mitigation

To develop a policy that introduces a carbon reduction standard that is more stringent than the current standard, subject to viability testing at the (regulation 19) proposed submission plan stage.

### Justification for the choice of options and selection of preferred option

#### Reasons the alternatives were selected

The Council's view is that the possible amendment to the Planning and Energy Act 2008 would not necessarily prevent the development of a policy that improves the carbon standards within new developments. However, a higher standard is likely to have cost impacts for new development. Therefore, development of a new standard could be feasible, subject to the whole plan viability testing at regulation 19 stage.

#### Reasons for selecting the preferred option in light of the alternatives

If a stronger national standard is introduced, the need for a local policy may be removed. Therefore, it is necessary to understand what changes will be made nationally (if any) before deciding which course of action to take locally.

### Question 25:

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

Do you have any other comments or suggestions?

## Topic - Large scale renewable and low carbon energy

### Issues

- 5.124 Local Plan policy D2 supports the delivery of renewable and low carbon energy within developments, but it is silent on large-scale standalone renewable and low carbon energy developments like solar farms.
- 5.125 Under legislation, Local planning authorities are responsible for planning applications for renewable and low carbon energy development of 50 megawatts or below. Planning applications for developments above this size are the responsibility of the Secretary of State for Energy.
- 5.126 The NPPF is positive about low carbon energy developments and requires plans to “provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts)”, “consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure” and “identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers” (paragraph 151).
- 5.127 It also states (at paragraph 154) that local authorities should approve applications for such developments “if its impacts are (or can be made) acceptable”. The footnote for paragraph 154 adds an additional test for wind farms where it states “Except for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing”.
- 5.128 Policy D2 meets the requirements of the NPPF through its support for low carbon energy in new developments and by identifying locations for combined heating and power ((C)CHP) networks. However, Policy D2 does not set out locations that may be suitable for other low carbon and renewable energy sources.
- 5.129 The Guildford Renewable Energy Mapping Study sought to identify suitable locations for large-scale renewable energy developments and found limited opportunities. However, it was a high-level study and did not look at potential locations in detail.

### **Biodiversity**

- 5.130 When sited on greenfield sites, some renewable energy developments can have impacts on biodiversity. For example, solar farms have sometimes used chemicals to prevent plants from shading panels, and recent research has shown that solar panels can negatively affect water-dwelling insects that mistake the panels for open water. However, these impacts can be avoided e.g. by controlling plants with grazing instead of chemicals and placing white markings on panels to deter water-dwelling insects. Research by the Building Research Establishment, which has been endorsed by a number of wildlife and nature groups, has resulted in guidance that shows that solar farms can be delivered in a manner that offers strong benefits for biodiversity and agriculture.

### **Green Belt**

- 5.131 The delivery of large scale renewable and low carbon energy developments may be more complicated in Guildford borough given that approximately 84 per cent of the borough is covered by Green Belt, and the majority of the non-green belt land is either covered by settlements or is allocated for other types of development.
- 5.132 Green Belt policy is set nationally and restricts development in Green Belt areas, defining many types of development as “inappropriate”. Regarding renewable energy, it states:
- 147. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.*
- 5.133 As a result of this, the Guildford Renewable Energy Mapping Study largely excluded Green Belt land. However, some forms of development are not necessarily inappropriate in the Green Belt, such as the re-use of buildings and change of use of land, provided there is no conflict with the purposes of the Green Belt and openness is preserved.

## Policy D15: Large Scale Renewable and Low Carbon Energy

- 5.134 The Council's preferred approach is to include a policy that indicates clear support for renewable development in specific locations. The locations would be established through a study that identifies the most suitable and technically feasible locations.

### **Preferred option for large scale renewable and low carbon energy**

To allocate one or more sites for renewable and low carbon energy development in appropriate locations where visual and other impacts will be minimised and where energy potential is good.

New large scale renewable and low carbon energy developments are required to set out in a management plan how biodiversity will be supported, maximising opportunities for biodiversity gain in line with good practice guidance.

### **Alternative options for large scale renewable and low carbon energy**

To not allocate land for renewable and low carbon energy developments, but to have a general policy that supports the principle of renewable and low carbon energy development in appropriate places, setting criteria that prevents negative impacts on landscape, heritage, Green Belt etc. This could provide guidance on which elements of such energy developments would be acceptable within the Green Belt and clarifying the NPPF overarching policy.

To not have a specific policy covering this issue but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019 and to rely on guidance in the National Planning Policy Framework and Planning Practice Guidance.



## **Justification for the choice of options and selection of preferred option**

### **Reasons the alternatives were selected**

Aside from allocating land for renewable energy development, the only reasonable alternatives are to set a criteria-based policy without allocations or to have no policy.

### **Reasons for selecting the preferred option in light of the alternatives**

Allocating land for renewable development provides the most certainty for potential developers and enables the most appropriate sites to be located. While having a criteria-based policy could also steer renewable energy development to the best locations, it would introduce more uncertainty into the planning process than allocating land, leading to delays in planning decisions.

This policy would be contingent upon the identification of suitable sites for renewable energy, established through an appropriate study.

### **Question 26:**

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

Do you have any other comments or suggestions?

## The Historic Environment

### Introduction

5.135 Guildford borough's historic environment is intrinsically part of what makes Guildford the place it is. This historic environment includes many important heritage assets, both statutory designated and non-designated that contribute to the borough's character, sense of place and quality of life. They can play a powerful role in shaping distinctive, vibrant and prosperous places. It is therefore imperative that the Council pro-actively seek opportunities to enhance or better reveal the significance of heritage assets and their setting and add to their long-term sustainability through all appropriate means, applying the historic environment evidence base as part of the strategy for achieving positive outcomes for the historic environment.

#### National policy context

5.136 There is a comprehensive set of national legislation and guidance that informs how the historic environment is to be protected and managed. This has and will continue to evolve over time. The key components at the national level are currently:

- Planning (Listed Building and Conservation Areas) Act 1990
- Ancient Monument and Archaeological Areas Act 1979
- The National Planning Policy Framework
- The National Planning Policy Guidance

#### National Planning Policy Framework (NPPF, 2019)

5.137 The National Planning Policy Framework (NPPF) is very clear that the historic environment is a fundamental component to successfully achieving sustainable development<sup>101</sup>. In order to achieve this the NPPF requires that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for the conservation and enhancement of the natural, built and historic environment<sup>102</sup>.

5.138 There is recognition within the Framework that heritage assets are an irreplaceable resource and should be conserved in a manner that is appropriate for their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations<sup>103</sup>.

---

<sup>101</sup> NPPF 2018, Para 8, part c).

<sup>102</sup> NPPF 2018, Para 20.

<sup>103</sup> NPPF 2018, Para 184.

5.139 In developing this strategy there is an expectation upon Local Planning Authorities to seek a positive strategy for the conservation and enjoyment of the historic environment, taking into account:

- the desirability of sustaining and enhancing the significance of heritage assets, putting them to viable uses consistent with their conservation,
- the wider social, cultural, economic and environmental benefits,
- the desirability of new development making a positive contribution to local character and distinctiveness,
- opportunities to draw on the contribution made by the historic environment to the character of a place<sup>104</sup>.

5.140 There is also a clear prerequisite throughout the Framework that any harm or loss to a heritage asset requires clear and convincing justification<sup>105</sup>.

#### **National Planning Practice Guidance (NPPG, 2014)**

5.141 The PPG Conserving and Enhancing the Historic Environment reaffirms that protecting and enhancing the historic environment is an important component of the Framework's drive to achieve sustainable development, providing more advice to both plan-making and decision taking. It recommends that plans should set out a positive strategy for the conservation and enjoyment of the historic environment and that they should identify specific opportunities for the conservation and enhancement of heritage asset, including their setting<sup>106</sup>.

5.142 The guidance also makes clear that the delivery of the strategy may require the need for the development of specific policies, for example, in relation to the use of buildings and design of new development and infrastructure, as well as stipulating the need to consider the relationship and impact of other policies<sup>107</sup>.

#### **Legislative Framework**

5.143 In addition to the NPPF there are a couple of specific Acts relating to the historic environment. Policy must continue to reflect and acknowledge these duties. These are;

- The Planning (Listed Buildings and Conservation Areas) Act 1990 (amended by the Enterprise and Regulatory Reform Act 2013) provides specific protection for buildings and areas of special architectural or historic interest. It covers the recording of Listed Buildings and the designation of Conservation Areas. It also imposes a duty on local planning authorities when considering to grant listed building consent to have regard to the preservation of the building or its setting or any features of special architectural or historic interest in the case of Listed Buildings. Equally, in the case of development affecting Conservation Areas, the Act requires that special attention is given to the desirability of preserving or enhancing the character or appearance of that area.

---

<sup>104</sup> NPPF 2018, Para 185.

<sup>105</sup> NPPF 2018, Para 186 – 202.

<sup>106</sup> NPPG Paragraph: 003 Reference ID: 18a-003-20190723.

<sup>107</sup> NPPG Paragraph: 003 Reference ID: 18a-003-20190723.

- The Ancient Monuments and Archaeological Areas Act 1979<sup>108</sup> consolidates and amends the law relating to Ancient Monuments. It makes provision for the investigation and recording of matters of archaeological or historical interest, and for the regulation of operations or activities affecting these matters.

### Historic England

5.144 In conjunction with the above, Historic England has also published a trilogy of guidance in the form of Good Practice Advice notes, in addition to other guidance documents covering a number of subject matters:

- GPA1: The Historic Environment in Local Plans<sup>109</sup> (2015)
- GPA2: Managing Significance in Decision Taking in the Historic Environment<sup>110</sup> (2015)
- GPA3: The Setting of Heritage Assets<sup>111</sup> (2017)
- Conservation Principles, Policies, and Guidance for the Sustainable Management of Historic Environment<sup>112</sup> (2008)
- Making Changes to Heritage Assets: Historic England Advice Note 2<sup>113</sup> (2016)
- Conservation Area Appraisal, Designation and Management: Historic England Advice Note 1<sup>114</sup> (2019)
- Listed Buildings and Curtilage: Historic England Advice Note 10<sup>115</sup> (2018)
- Local Heritage Listing: Historic England Advice Note 7<sup>116</sup> (2016)

### Local strategies and evidence

#### Relevant policies in Guildford Borough Local Plan 2003 (to be replaced in the new Local Plan)

5.145 Currently the Local Authority relies on the saved policies of the 2003 Local Plan, specifically those contained within Chapter 11 Historic Environments. These policies are split into three sub-categories, Listed Buildings, Conservation Areas and Archaeology.

- Policy HE2 Change of use of Listed Buildings,
- Policy HE4 New development which affects the setting of a listed building,
- Policy HE5 Advertisement on Listed Buildings,
- Policy HE7 New development in Conservation Areas,

---

<sup>108</sup> Ancient Monuments and Archaeological Areas Act 1979. Available online at: [http://www.legislation.gov.uk/ukpga/1979/46/pdfs/ukpga\\_19790046\\_en.pdf](http://www.legislation.gov.uk/ukpga/1979/46/pdfs/ukpga_19790046_en.pdf).

<sup>109</sup> <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>.

<sup>110</sup> <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>.

<sup>111</sup> <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

<sup>112</sup> <https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/>.

<sup>113</sup> <https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>.

<sup>114</sup> <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>.

<sup>115</sup> <https://historicengland.org.uk/images-books/publications/listed-buildings-and-curtilage-advice-note-10/>.

<sup>116</sup> <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>.

- Policy HE8 Advertisement in Conservation Areas,
- Policy HE9 Demolition in Conservation Areas,
- Policy HE10 Development which affects the setting of a Conservation Area,
- Policy HE11 Scheduled Ancient Monuments and other sites and monuments of national importance,
- Policy HE12 Historic parks and gardens.

#### **Relevant policies in Guildford borough Local Plan: strategy and sites 2019**

- Policy D3 Historic Environment

#### **Relevant supplementary planning guidance**

- Conservation Areas Character Appraisals<sup>117</sup> (Guildford Borough Council)
- Neighbourhood Plans<sup>118</sup> (Guildford Borough Council)
- Landscape Character Assessment<sup>119</sup> (Guildford Borough Council, 2007)
- Historic Landscape Character Assessment (Surrey County Council, 2015)
- Surrey Historic Environment Record<sup>120</sup>
- National Historic Environment Record<sup>121</sup>
- The National Heritage List for England<sup>122</sup>

### **Relevant Objectives from LPSS**

**Objective 3:** To ensure that all development is of high-quality design and enables people to live safe, healthy and active lifestyles.

**Objective 4:** To retain the distinct character and separate identities of our settlements.

**Objective 5:** To protect and enhance our heritage assets and improve the quality of our built and natural environment.

**Objective 10:** Support and expand the economic vitality of our rural areas whilst protecting existing heritage, landscape and character.

**Objective 11:** Reinforce Guildford's role as Surrey County's premier town centre destination whilst protecting and enhancing its cultural facilities and heritage assets.

<sup>117</sup> Completed conservation area character appraisals: – Abbotswood, Bridge Street, Charlotte and Warren Road, Chilworth, East Clandon, Guildford Town Centre, Holmbury St Mary, Onslow Village, Pirbright, Ripley, Shere, St Catherine's, Waterden Road - <https://www.guildford.gov.uk/article/16933/Conservation-Area-Character-Appraisals>.

<sup>118</sup> Adopted neighbourhood plans: - Burpham, Effingham, East Horsley, West Horsley - <https://www.guildford.gov.uk/neighbourhoodplanninginformation>.

<sup>119</sup> <http://www.guildford.gov.uk/landscapescharacterassessment>.

<sup>120</sup> <https://www.surreycc.gov.uk/land-planning-and-development/historical-planning/historic-environment-record>.

<sup>121</sup> <https://www.heritagegateway.org.uk/gateway/CHR/>.

<sup>122</sup> <https://historicengland.org.uk/listing/the-list/>.

## Issues

- 5.146 The main aim of policies on designated heritage assets is to protect them from harm and to recognise the contribution they make to the environment. In the context of the range, number and quality of designated heritage assets within the borough, special consideration must be given to the following issues.

### **Promoting and reinforcing local distinctiveness:**

- 5.147 Over the past few decades, economic pressures, 'anywhere' standard design in many new developments and, to some extent, changes to building regulations and energy efficiency requirements can begin to water down our area's local distinctiveness.
- 5.148 To add to this, the advent of new building technologies, improving the sustainability of construction materials and building functionality may negatively impact upon the appearance and form of development, to the extent where there could be a need to reconcile this with the vernacular character of our buildings, villages and town, as a measure of safeguarding Guildford's local distinctiveness.

### **Improving the environmental performance of heritage assets while retaining their significance:**

- 5.149 The energy efficiency of buildings is covered in Policy D2: Climate change, sustainable design, construction and energy. However, the implications of energy efficient measures for designated heritage assets need particular consideration. There are opportunities in most historic buildings to improve energy conservation without causing harm, through measures such as secondary glazing, improved loft insulation using natural breathable materials, low energy lighting and the use of fuel-efficient boilers. In some cases, renewable energy technologies can also be installed without causing harm when considered carefully and holistically.
- 5.150 In instances where harm would be caused by the introduction of energy conservation or renewable energy measures, then less harmful alternatives should be considered. Where conflict does occur, the benefits of the energy conservation measures and the extent of harm to the heritage significance must be weighed against the public benefit.

### **Strategy for Heritage at Risk:**

- 5.151 The NPPF cites clearly the need for plans to include heritage assets most at risk through neglect, decay or other threat. Historic England's Heritage at Risk Register<sup>123</sup> identifies only a handful of designated heritage assets within the Borough as currently being at risk – with 4 listed buildings on the register, with most having some form of solution agreed or repair works having commenced, and 1 registered park and garden, Clandon Park. There are currently no conservation areas identified as being at risk.

---

<sup>123</sup> Available online at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/>.

- 5.152 However, there is always an underlying concern and fear that other assets could become at risk, through poor maintenance, neglect, architectural theft, and unforeseen accidents. The most practical way for ensuring that these assets do not fall into disrepair and become at risk is through ensuring that they continue to be valued and remain in active use. Therefore, policy should continue to allow for sympathetic changes based on a clear understanding of significance where it allows buildings to remain in active use consistent with their conservation.

**Evidence and Understanding:**

- 5.153 It is important that proposals, whether relating to a designated heritage asset or not, are based on a meaningful understanding of the historic context and character of the area. Proposals should undertake an assessment of a heritage asset's significance and applications should describe the significance of any heritage asset affected including any contribution made by their setting. All development proposals should be informed by the Authority's Landscape Character Assessment, the Historic Environment Record (HER) and Conservation Area Character Appraisals where available.

**Providing appropriate and proportionate protection to non-designated heritage assets:**

- 5.154 Government guidance makes it clear that the effect of an application on the significance of a non-designated heritage asset should be taken into account when determining applications. Nevertheless, despite the provision of this guidance these assets are particularly vulnerable to inappropriate change, damage or loss due to their lack of specific protection. It is therefore important that forthcoming policy recognises the importance of non-designated heritage assets, setting out what is likely to be considered with a non-designated heritage asset and making clear that a proportionate approach to their protection will be taken.

**Balancing the need for change and development against the need to protect the historic environment:**

- 5.155 Guildford's history and its designated historic assets are hugely important to the identity of the town and its community. Nevertheless, development pressures are likely to continue due to the need to utilise space within existing urban areas. Some of the distinctiveness of historic settlements could be compromised by development if it does not respect local materials, form, density or scale, and the significance of individual heritage assets could also be compromised. Nevertheless, it is recognised that heritage assets can help to foster a sense of place and can be used to anchor new development and mediate between old and new.

## Topic – Designated Heritage Assets

- 5.156 The historic environment is a reflection of the impact that people have left on the landscape over time. Within Guildford borough the historic environment makes a key contribution to the borough's reputation for high quality environments. As such, the historic environment is an important asset worthy of long-term protection and it is recognised that heritage assets are an irreplaceable resource.
- 5.157 The NPPF identifies the conservation and enhancement of designated and non-designated heritage assets in a manner appropriate to their significance as a material consideration in the determination of planning applications. New development should sustain and enhance the significance of heritage assets and can support these aims by creating or supporting viable uses that are consistent with an asset's conservation. As such, there is a presumption in favour of the conservation and enhancement of all heritage assets and any resultant harm will need to be clearly justified. The more significant the asset, the greater the level of justification needed.
- 5.158 The Council's preferred approach is to have a collection of DM policies that support the objectives set out in the Local Plan and expand upon the general principles set out in Policy D3. This is set out below.

## Policy D16: Designated Heritage Assets

### Issues

- 5.159 Designated Heritage Asset is a general term given to any of the following; a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area. All of these assets have been formally designated under the relevant legislation, thereby benefiting from statutory protection.
- 5.160 Designated heritage assets are generally protected by robust legislation and very strong national policy. The presence of a designated heritage asset does not necessarily preclude the possibility of new development.



5.161 Table 1 (below) summarises the diversity of Guildford’s designated heritage assets.

*Table 1: Designated heritage assets in Guildford borough*

Heritage Assets	Numbers in Guildford Borough
<b>Statutory Listed Buildings</b>	10971*
Grade I	34
Grade II*	41
Grade II	1022
<b>Conservation Areas</b>	40
Article 4 Directions	8
<b>Scheduled Monuments</b>	32
<b>Registered Parks and Gardens</b>	10

\*Does not include buildings or structures in the curtilage of a listed building, a listing may include a complex of buildings

5.162 Applications for development likely to affect a designated heritage asset will be required to contain sufficient information to allow a thorough assessment to be made of the impact upon the significance of the asset(s). Furthermore, should it be discovered, during the process of determination, that a proposal would impact a heritage asset, further information will be required from the applicant.

5.163 The NPPF states ‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting’. Thus, a heritage statement must be submitted with all applications affecting designated heritage assets or their setting. The detail included should be proportionate to the significance of the heritage asset and the potential impact of the asset’s significance. Only by requiring this assessment can the Authority ensure that the impact (positive or negative) of any development proposal on the asset and its setting can be understood and considered.

5.164 The Heritage Statement should:

- Describe and establish the degree of significance of a heritage asset and its setting.
- Provide details of the history and development of the asset using the Historic Environment Record and/or other relevant sources of information.
- Include an assessment of the impact of the proposed works (positive or negative) proportionate to the significance of the asset and its setting.
- Provide a clear justification for the works and details of any mitigation measures proposed.

- 5.165 The long-term conservation of a small minority of heritage assets can sometimes present particular problems. This is a result of the disparity between the costs of renovating the asset in a suitable manner and the final end value. This disparity is known as the 'conservation deficit'. In extreme cases, a recognised way of addressing this is to allow development in a location, or of a nature or form, that would normally be considered unacceptable in planning policy terms, which would generate sufficient funds to cover the shortfall in the renovation costs, and where it would bring public benefits sufficient to justify it being carried out, and which could not otherwise be achieved. This approach is known as 'enabling development'.
- 5.166 Enabling development should only ever be regarded as a last resort in restoring heritage assets once all other options have been exhausted. Development should constitute the minimum required to cover the conservation deficit. It should also not materially harm the heritage significance of the place (including its setting where relevant) and should produce public benefits which outweigh the dis-benefits of conflicting with other policies. Enabling development should contribute to the special qualities of the Borough and allow public appreciation of the saved heritage asset.

### **Preferred option for designated heritage assets**

The Council's objective is to set out a positive strategy for the conservation and enhancement of all designated heritage assets by having a policy that addresses the following issues:

#### **Supporting Information**

- 1) Expects all proposals affecting designated heritage assets, including curtilage buildings and structures and their setting, to be supported by a Statement of Significance and Impact. The level of detail provided within the statement should be proportionate to the assets' importance and no more than is sufficient to facilitate an understanding of the potential impact. To accord with the requisite of validation it must:
  - a) have consulted the relevant historic environment record;
  - b) demonstrate a clear understanding of the asset's significance including all those parts affected by the proposals, and where applicable the contribution made by its setting;
  - c) explain how the asset and its setting will be affected by the proposal, including how the proposal preserves or enhances the heritage asset or better reveals its significance;
  - d) demonstrate what steps have been taken to mitigate any resultant harm;
  - e) present a justification for the proposals that explains why any resultant harm is considered to be necessary or desirable; and
  - f) identify what public benefits might arise from the proposals in cases where harm has been identified.

### **Loss of Significance**

- 2) Proposals which result in harm to, or loss of, the significance of a designated heritage asset will be considered in line with the policies in the NPPF (specifically paragraphs 194 – 196). The level of public benefit associated with the preservation of heritage assets on the 'Heritage at Risk' register managed by Historic England may require special consideration in terms of the impact on the significance of the asset.

### **Enabling Development**

- 3) Development proposals for enabling development that would otherwise conflict with other planning policies, but which would secure the future conservation of a heritage asset will be supported provided:
  - a) They meet all the tests set out in Historic England's Enabling Development Policy cited within the guidance document Enabling Development and the Conservation of Significant Places (or guidance superseding it), and
  - b) It can be demonstrated that alternative solutions are inappropriate, and
  - c) They are subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development.

### **Alternative options for designated heritage assets**

- 1) Not to have a specific policy and to solely rely upon national guidance in tandem with Policy D3 Historic Environment of the LPSS.

It could be sufficient for the Planning Authority to rely upon national guidance as currently set out in the NPPF along with Policy D3 of the Local Plan 2015-2034. This option would allow for greater flexibility in the consideration of planning applications but could lead to more inconsistent decisions. Its generality is likely to also have the consequence of failing to provide enough specific guidance to enable development to respond to distinctive character of the borough. Despite strong protection, this option may not go far enough to proactively enhance the historic environment. This option would bring positive effects, but these effects would be less pronounced than the preferred option.

## Justification for the choice of options and selection of preferred option

### Reasons the alternatives were selected

'No policy' is the only reasonable alternative as no further options were identified.

### Reasons for selecting the preferred option in light of the alternatives

The protection provided by the NPPF and Policy D3 of the Local Plan are both rather general, in that they do not provide detail as to how the historic environment should be conserved and enhanced in appropriate its significance. Whilst the NPPF does expand slightly upon issues regarding supporting information and enabling development the details are still fairly generalised. It is therefore deemed necessary to provide more operational detail on this matter to proactively shape development so that it safeguards these heritage assets and the historic environment.

## Definitions

### Enabling Development:

Development which would be unacceptable in planning terms but for the fact that it would bring sufficient public benefits to justify it being carried out, and which could not otherwise be achieved<sup>124</sup>.

### Heritage at Risk:

Heritage at Risk is a rolling programme run and managed by Historic England to produce a dynamic picture of the sites most at risk, as result of neglect, decay or inappropriate development. The register, which can be accessed online, includes, buildings and structures, places of worship, archaeological sites, conservation areas, registered parks and gardens, registered battlefields and protected wreck sites.

### Historic Environment:

All aspects of environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged and landscaped and planted or managed flora<sup>125</sup>.

### Historic Environment Record:

Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

<sup>124</sup> Historic England (2008) *Enabling Development and the Conservation of Significant Places*, para. 1.1.1.

<sup>125</sup> NPPF Annex 2: Glossary.

**Public Benefit:**

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits<sup>126</sup>.

**Significance:**

Significance is defined as the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence but also from its setting.

**Question 27:**

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

Do you have any other comments or suggestions?

---

<sup>126</sup> PPG Paragraph: 020 Reference ID: 18a-020-20190723.

## Topic - Listed Buildings

### Listed Buildings

- 5.167 A statutory Listed Building is a 'building, object or structure of special architectural or historic interest' as compiled by The Secretary of State for the Department of Culture Media and Sport (DCMS) and maintained by Historic England who act as the government's advisor<sup>127</sup>. There are three grades of listed building, which are grade I, II\* or II. Whilst the different grades serve to highlight levels of significance, all assets are covered by the same level of protection.
- 5.168 The designation mechanism is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 5.169 Guildford currently has approximately 1,100 entries on the list which form an integral and valuable part of the borough's historic environment and cultural landscape. They include historic properties such as Abbots Hospital, and Hatchlands, public house, ecclesiastical buildings such as Watts Chapel and structures such telephone kiosks, bridges, vaults and tombstone. Of these list entries 34 are grade I listed and 41 are grade II\*.
- 5.170 By law when making decisions on all listed building consent applications, or proposals for development that affects a listed building or its setting, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest. In this context preservation means not harming the interest and significance of the building, as opposed to preventing any change. There is a strong presumption in favour of the retention and preservation of Listed Buildings.
- 5.171 The cumulative impact of incremental small-scale changes such as the gradual loss of architectural features, traditional materials and successive additions and alterations can lead to the erosion of significance and may have as great an effect on the significance of the heritage as large-scale change. In instances where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration will still need to be given to whether additional changes will further detract from, or can enhance, the significance of the asset.
- 5.172 The setting of a listed building is also protected, both directly in its own right and indirectly from the adverse effects of nearby developments. It may include features such as outbuildings, boundary walls and ornamental structures within the building's curtilage as well as beyond it.
- 5.173 Applications for development or other works affecting a listed building should show why the works are desirable and/or necessary. It must be supported by a thorough but proportionate assessment of the assets architectural or historic significance, its features and setting. The assessment is required both to inform the design proposals and to enable a planning decision to be reached. Information in support of an application should include appropriate and legible floor plans, elevations, sections and details (at an appropriate scale); specifications, providing clarity on all proposed materials, and (in applications where external works are proposed) plans and elevations showing the building in context.

---

<sup>127</sup> Available online at: <https://historicengland.org.uk/listing/the-list>.

- 5.174 In terms of appropriate use of historic buildings, the best use for an historic building is very often that for which it was designed and intended. However, where conversion/ change of use is accepted, the types and levels of use of the building itself or its setting will be managed so to minimise any loss of character.
- 5.175 Some alterations to listed buildings are not classed as 'development' and may not require planning permission. However, most works to listed buildings, for example internal alterations and minor external works will require listed building consent. However, where planning permission is required for works to a listed building there is always a requirement to obtain listed building consent as well. In these cases, it is advocated that both should be applied for concurrently.
- 5.176 Loss of any significance of listed buildings, or any associated features contributing to their significance, including their setting will be resisted and will be permitted only where it has been clearly and convincingly justified and is outweighed by the public benefits of the proposal.

## Policy D17: Listed Buildings

### Preferred option for listed buildings

The aim of this policy is to add more operational detail to the LPSS Policy D3 for development proposals affecting listed buildings, to ensure their continued protection, by having a policy that:

- 1) Requires that alterations, additions or other works, directly, indirectly or cumulatively affecting the special interest of a statutory listed or curtilage listed building and their settings to:
  - a) Sustain and enhance the architectural and historical significance and integrity;
  - b) Be of an appropriate scale, form, height, massing and design which respects the host building and its setting;
  - c) Retain the historic plan form and structural integrity of the building;
  - d) Have regard to the architectural and historic features forming part of the special interest of the building;
  - e) Reinforce the intrinsic character of the building through the use of appropriate materials, details and building techniques;
  - f) Not harm the special interest and significance of buildings or structures forming part of the curtilage of the heritage asset; and
  - g) Respect the character and appearance of a park, garden or yard of historic or designated interest.

- 2) Supports proposals involving a change of use of part or the whole of a listed building where details of all intended alterations to the building and its curtilage have been shown, and where:
  - a) the proposed use would not be harmful to the special interest of the building;
  - b) the building is capable of accommodating the proposed change of use without considerable alteration and consequent loss of special interest.
- 3) Supports proposals that seek to adapt to, or mitigate the effects of, climate change that are sympathetic and conserve the special interest and significance of the heritage asset or its setting. Where conflict between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change should be weighed against any harm to the significance of heritage assets.

### **Alternative options for listed buildings**

- 1) Not to have a specific policy and to solely rely upon national guidance in tandem with Policy D3 Historic Environment of the LPSS.

It could be sufficient for the Planning Authority to rely upon national guidance as currently set out in the National Planning Policy Framework. Despite strong protection, this option may not go far enough to proactively enhance the historic environment. This option would bring positive effects, but these effects would be less pronounced than the preferred option.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

#### **Reasons for selecting the preferred option in light of the alternatives**

The protection provided by the NPPF and Policy D3 does not provide sufficient detail as to how the historic environment should be conserved and enhanced.



## Definitions

### Historic Environment:

All aspects of environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged and landscaped and planted or managed flora<sup>128</sup>.

### Public Benefit:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF<sup>129</sup>.

### Setting of a Heritage Asset:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral<sup>130</sup>.

### Significance:

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance<sup>131</sup>.

### Question 28:

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

Do you have any other comments or suggestions?

---

<sup>128</sup> NPPF Annex 2: Glossary.

<sup>129</sup> PPG Paragraph: 020 Reference ID: 18a-020-20190723.

<sup>130</sup> NPPF Annex 2: Glossary.

<sup>131</sup> NPPF Annex 2: Glossary.

## Topic - Conservation Areas

### Conservation Areas

- 5.177 Conservation Areas are areas that are designated because of their special architectural or historical interest, the character of which it is desirable to preserve or enhance. They are not designated on the basis of individual buildings but on the basis of the quality and interest of an area. They can come in a variety of sizes and types, ranging from villages, neighbourhoods and parts of towns with every area having its own distinctive character, derived from features such as its topography, historic development, current uses, groupings of buildings, scale and detailing of open spaces, historic layout and vernacular form and detailing.
- 5.178 The local planning authority is required by statute<sup>132</sup> to designate as Conservation Areas those areas which are valued for their special architectural or historic interest, the character and appearance of which it is desirable to preserve and enhance.
- 5.179 The borough has 40 Conservation Areas, which cover many parts of Guildford town centre and many of the Borough's rural villages both of which make a very significant contribution to the character and distinctiveness of the district. These are:
- Abbotswood
  - Abinger Hammer
  - Albury
  - Basingstoke Canal North
  - Basingstoke Canal South
  - Bisley Camp
  - Bridge Street, Guildford
  - Charlotteville and Warren Road
  - Chilworth
  - Compton
  - Eashing
  - East Clandon
  - East Horsley
  - Effingham
  - Guildford Town Centre
  - Holmbury St Mary
  - Littleton
  - Millmead and Portsmouth Road
  - Ockham
  - Ockham Mill
  - Onslow Village
  - Peaslake
  - Pirbright
  - Puttenham
  - Ripley

---

<sup>132</sup> Planning (Listed Building and Conservation Areas) Act 1990.

- St Catherines
- Seale
- Shackleford
- Shalford
- Shere
- Stoke Fields
- Stoughton Barracks
- Wanborough
- Waterden Road
- West Horsley
- Wey and Godalming Navigations
- Wisley
- Wood Street
- Worplesdon

- 5.180 Thirteen of these areas are complemented by an adopted Conservation Area Character Appraisal. These appraisal documents undertake vital analysis that helps with justifying the reasons for designating the area and provides a meaningful understanding of the unique qualities and characteristics that contribute to its significance. Its significance as a designated heritage asset is determined by the sum of all the features which contribute to its valued character and appearance. They are taken into account by the Authority when considering the relative merits of development proposals and the significance of heritage assets affected by them. Those with interests in a Conservation Area are advised to consult with the relevant appraisal prior to submitting an application to the Local Planning Authority.
- 5.181 The Authority has a duty to ensure the preservation and enhancement of the character or appearance of the conservation areas throughout the Borough, and all applications will be assessed within this context. Designation emphasises the special care that must be taken over the design, layout and materials of development proposals to ensure the character and appearance of these areas are preserved and enhanced. Prevailing traditional materials, features and detailing should be recognised and reflected in development proposals. However, new development does not always have to mimic the past, and high-quality schemes that provide a successful visual contrast with their surroundings may also be appropriate as modern contemporary architecture can have effect in place shaping. Where appropriate, innovation and artistic expression will be encouraged.
- 5.182 The Authority has also introduced Article 4 Directions on domestic properties within 8 of the designated Conservation Areas within the borough<sup>133</sup>. This is a mechanism for tightening planning control over changes that are likely to directly impact on public views, typically affecting development to the front of houses facing onto a public highway or open space.
- 5.183 Demolition or other forms of substantial loss to the significance of buildings and features that contribute positively to a Conservation Area will be resisted except in very exceptional cases, where it can be satisfactorily demonstrated that the building is structurally unsound or of little or no importance to the character and appearance of the area.

---

<sup>133</sup> Article 4 Directions have been confirmed covering: Abbotswood Conservation Area, Charlottetown and Warren Road Conservation Area, East Clandon Conservation Area, Guildford Town Centre Conservation Area, Onslow Village Conservation Area, St Catherine's Conservation Area, Shere Conservation Area, Waterden Road Conservation Area.

## Policy D18: Conservation Areas

### Preferred option for conservation areas

The Council's objective is to add more operational detail to the LPSS Policy D3 for development proposals affecting development with conservation Areas, to ensure their continued protection, by having a policy that:

- 1) Requires that any development within or which would affect the setting of a Conservation Area to preserve and enhance the character and local distinctiveness of the area. It must pay due regard to the Council's Conservation Area Appraisal for the relevant area.
- 2) Requires development within, affecting the setting of, or views into or out of a Conservation Area to preserve and enhance features that contribute positively towards the area's character and appearance. Particular consideration will be given to the following:
  - a) The retention of buildings, groups of buildings, historic settlement patterns, plot widths, open spaces, historic building lines and ground surface;
  - b) Retention of architectural details that contribute positively to the character or appearance of the area;
  - c) The impact of the proposal on the skyline and landscape;
  - d) The protection of trees that contribute positively towards the character and appearance of the area.
- 3) Requires proposals for all new development, and extensions and alterations to existing buildings to be of a high quality of design, which reinforces or compliments the character and local distinctiveness of the Conservation Area by having regard to:
  - a) the height, massing, scale, form, roofscape, plot width and spaces between buildings;
  - b) the use of good quality sustainable building materials and detailing appropriate to the locality and sympathetic in colour, profile and texture.
- 4) Seeks to retain attractive traditional materials, features and detailing such as original doors, windows, chimneys and boundary walls

## Alternative options for conservation areas

- 1) Not to have a specific policy and to solely rely upon national guidance in tandem with Policy D3 Historic Environment of the Local Plan 2015-2034.

It could be sufficient for the Planning Authority to rely upon national guidance as currently set out in the National Planning Policy Framework. Despite strong protection, this option may not go far enough to proactively enhance the historic environment. This option would bring positive effects, but these effects would be less pronounced than the preferred option.

## Justification for the choice of options and selection of preferred option

### Reasons the alternatives were selected

'No policy' is the only reasonable alternative as no further options were identified.

### Reasons for selecting the preferred option in light of the alternatives

The protection provided by the NPPF and Policy D3 of the Local Plan are both rather general and do not provide sufficient detail as to how the historic environment should be conserved and enhanced. Whilst the NPPF does expand slightly upon issues regarding supporting information and enabling development the details are still fairly generalised. It is therefore deemed necessary to provide more operational detail on this matter to proactively shape development so that it safeguards these heritage assets and the historic environment.

## Definitions

### Article 4 Direction:

Direction removing some or all permitted development rights, for example within a conservation area or curtilage of a listed building<sup>134</sup>.

### Conservation Area:

An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance<sup>135</sup>.

### Conservation Area Appraisal:

An assessment of a conservation area or potential conservation area to record and understand why the area is special and what elements make a positive or negative contribution<sup>136</sup>.

<sup>134</sup> [https://www.planningportal.co.uk/directory\\_record/117/article\\_4\\_direction](https://www.planningportal.co.uk/directory_record/117/article_4_direction).

<sup>135</sup> Section 69(1) (a) Planning (Listed Building and Conservation Areas) Act 1990

<sup>136</sup> Conservation Area Designation, Appraisal and Management (Historic England).

**Historic Environment:**

All aspects of environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged and landscaped and planted or managed flora<sup>137</sup>.

**Public Benefit:**

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF<sup>138</sup>.

**Setting of a Heritage Asset:**

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral<sup>139</sup>.

**Significance:**

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance<sup>140</sup>.

**Question 29:**

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

Do you have any other comments or suggestions?

---

<sup>137</sup> NPPF Annex 2: Glossary.

<sup>138</sup> PPG Paragraph: 020 Reference ID: 18a-020-20190723.

<sup>139</sup> NPPF Annex 2: Glossary.

<sup>140</sup> NPPF Annex 2: Glossary.

## Topic - Scheduled Monuments & Registered Parks and Gardens

### Scheduled Monuments

5.184 Scheduled Monuments consist of archaeological sites, monuments, structures or buried remains of national importance which are given legal protection by being included in the 'Schedule of Monuments by The Secretary of State for the Department of Culture Media and Sport (DCMS) on the advice of Historic England. They are protected independently of the planning system, under the Ancient Monuments and Archaeological Areas Act 1979. The nine 'scheduling criteria' are as follows:

- extent of survival;
- current condition;
- rarity;
- representation (either through diversity or because of one important attribute);
- period (importance of the period to which the monument relates);
- fragility;
- group value (connection to other monuments: spatially, chronologically or thematically);
- potential (to contribute to our information, understanding and appreciation), and
- documentation (extent of information available that enhances the monument's significance).

The selection of which monuments to schedule then depends upon the 'score' achieved relative to others considered within that type, and to a lesser extent upon the regional pattern of representation.

5.185 There are 38 Scheduled Monuments within the borough. They constitute a finite and non-renewable resource that are valuable for their own sake and for their role in education, leisure and tourism. In many cases these assets are highly fragile and vulnerable to damage and destruction.

5.186 It is illegal to undertake any works within an area designated as part of the monument without gaining Scheduled Monument Consent, this includes repairs.

5.187 The NPPF establishes a clear presumption against the loss of or substantial harm to a scheduled ancient monument and states that any harm to a designated heritage asset must be weighed against the public benefits of the proposal.

5.188 Applications for scheduled monument consent must be made to Historic England and not the Local Planning Authority. However, the effect of any works which require planning permission or listed building consent on a Scheduled Monument, or its setting, is a material planning consideration and any proposals which require planning permission, and which will have a negative effect on a Scheduled Monument, or its setting is unlikely to gain support.

5.189 In accordance with the NPPF, information on the heritage significance of a site should be supplied with all planning applications to enable assessment of the impact of development on historic assets. Dependant on the assessed impact, there may be a requirement to undertake pre-determination evaluation in order that an appropriate mitigation strategy can be incorporated in the development. This might include preservation in situ or preservation by record dependant on the work being proposed and the significance of any assets affected. Consultation with Surrey County Council's archaeologists is advised.

### **Registered Parks and Gardens**

5.190 Historic parks and gardens are a fragile and finite resource. They are an important part of the heritage and environment of the district. They comprise of a variety of features: the open space; views in and out; the planting; water features; built features and archaeological remains. There is a need to protect such sites and their settings from new development which would destroy or harm the historic interest.

5.191 Under the provisions of the Historic Buildings and Ancient Monuments Act 1953, Historic England compiles and maintains a national register of parks and gardens that are of special interest, known as The Register of Landscapes Parks and Gardens of Special Historic Interest. Entries on the register are classified as either:

- Grade I: parks and gardens of exceptional interest
- Grade II\*: parks and gardens of particular importance, being more than special interest; and
- Grade II: parks and gardens of special interest, warranting preservation.

5.192 The main purpose of this Register is to celebrate designated landscapes of note and encourage appropriate protection. It does not entail additional planning controls but does make these assets a material consideration in the planning process, meaning that the Local Planning Authority must consider the impact of any proposed development on the landscape's special character.

5.193 There are 8 Registered Parks and Gardens within the borough, these are:

- Albury Park
- Clandon Park
- Compton Cemetery (also known as Watts Cemetery)
- Hatchlands
- The Jellicoe Roof Garden, Guildford
- Littleworth Cross
- Merrow Grange
- RHS Wisley



## Policy D19: Scheduled Monuments & Registered Parks and Gardens

### Preferred option for scheduled monuments & registered parks and gardens

The Council's objective is to add more operational detail to the LPSS Policy D3 for development proposals affecting Scheduled Monuments & Registered Parks and Gardens, to ensure their continued protection by having a policy that includes the following measures:

#### Scheduled Ancient Monuments

- 1) Proposals affecting scheduled ancient monument will be expected to pay consideration to:
  - a) The presumption against substantial harm to or loss of scheduled ancient monuments;
  - b) The relationship of the monument with other archaeology and the wider landscape in which it should be interpreted;
  - c) The condition and management of the monument;
  - d) The existing and future security of the monument; and
  - e) The desirability of increasing understanding, interpretation and public access

In such cases, an appropriate archaeological evaluation/assessment of significance by a suitably qualified person will be required.

- 2) Development that would prejudice the fabric or setting of a scheduled ancient monument, or planning applications which do not provide satisfactory information about the implications of the proposal upon a scheduled ancient monument, will be resisted.

#### Registered Parks and Gardens

- 3) Proposals affecting a registered historic park and garden will be expected to pay consideration to:
  - a) The presumption against substantial harm to or loss of a nationally registered historic park and garden;
  - b) The desirability of preserving or enhancing the special historic interest;
  - c) Safeguarding those features which form an integral part of its special character and appearance;
  - d) Ensure that development does not detract from the enjoyment, layout, design, character, appearance or setting of the Park or Garden, key views out from the Park, or prejudice its future restoration.

- 4) Development that would prejudice the fabric or setting of a registered park and gardened ancient monument, or planning applications which do not provide satisfactory information about the implications of the proposal upon a registered park and garden, will be resisted.

### **Alternative options for scheduled monuments & registered parks and gardens**

- 1) Not to have a specific policy and to solely rely upon national guidance in tandem with Policy D3 Historic Environment of the Local Plan 2015-2034.

It could be sufficient for the Planning Authority to rely upon national guidance as currently set out in the National Planning Policy Framework. This option would allow for greater flexibility in the consideration of planning applications but could lead to more inconsistent decisions. Its generality is likely to also have the consequence of failing to provide enough specific guidance to enable development to respond to distinctive character of the borough. Despite strong protection, this option may not go far enough to proactively enhance the historic environment. This option would bring positive effects, but these effects would be less-pronounced than the preferred option.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

#### **Reasons for selecting the preferred option in light of the alternatives**

The protection provided by the NPPF and Policy D3 of the Local Plan are both rather general and do not provide sufficient detail as to how. Whilst the NPPF does expand slightly upon issues regarding supporting information and enabling development the details are still fairly generalised. It is therefore deemed necessary to provide more operational detail on this matter to proactively shape development so that it safeguards these heritage assets and the historic environment.

## Definitions

### Archaeological Interest:

A heritage asset which holds or potentially could hold evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

### Historic Environment:

All aspects of environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged and landscaped and planted or managed flora<sup>141</sup>.

### Public Benefit:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF<sup>142</sup>.

### Setting of a Heritage Asset:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral<sup>143</sup>.

### Significance:

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance<sup>144</sup>.

### Question 30:

Do you agree with the preferred option to address Scheduled Monuments & Registered Parks and Gardens in Guildford?

Do you have any other comments or suggestions?

---

<sup>141</sup> NPPF Annex 2: Glossary.

<sup>142</sup> PPG Paragraph: 020 Reference ID: 18a-020-20190723.

<sup>143</sup> NPPF Annex 2: Glossary.

<sup>144</sup> NPPF Annex 2: Glossary.

## Topic - Non-Designated Heritage Assets

- 5.194 Non-designated heritage assets relate to buildings, monuments, sites, places, areas or landscapes of archaeological, architectural and historical significance which are not recognised through formal designation but have been identified by the Local Planning Authority as having a degree of significance meriting consideration in planning decisions.
- 5.195 The concept of non-designated heritage asset's as a planning consideration have been part of planning policy guidance since the 1990's, however it has become more closely defined in the NPPF and the accompanying National Planning Practice Guidance<sup>145</sup>.
- 5.196 Such assets may be identified at any time as evidence accumulates and may in some cases only come to light as part of the development management process, either through archaeological investigation or closer inspection of historic buildings or structures, and through the process of appraising conservation areas
- 5.197 A summary of the diversity of Guildford's non-designated heritage assets as currently identified is provided in Table 2 (below).

*Table 2: Non-designated heritage assets in Guildford borough*

Heritage Assets	Numbers in Guildford Borough
Locally Listed Buildings	313
Locally Listed Parks and Gardens	52
County Site of Archaeological Importance	34
Area of High Archaeological Potential	151

### Locally Listed Buildings

- 5.198 A Locally Listed building is a building or other structure which is deemed to be of local architectural or historic interest and significance, but which is not of sufficient importance to warrant national statutory listing (i.e. grade I, II\* and II), but whose significance merits consideration in the planning process as identified in the NPPF), but are instead identified by the Council as being an important part of the Borough's local heritage and identity.
- 5.199 The Local Authority has an adopted list of buildings of special local architectural or historic interest. This is known as the Local List. Although a building does not have any more legal protection if it's on this Local List, the list helps to provide a degree of control of any changes to these buildings and to make sure that their special interest and significance is not compromised. Those assets identified on the list are non-designated heritage assets.

<sup>145</sup> Department for Communities and Local Government (2014) 'National Planning Practice Guidance, Conserving and Enhancing the Historic Environment, Para 039'.

5.200 There are currently 313 entries on the Local List ranging from buildings and structures to telephone boxes, post boxes and walls, however this number is not static, with the Council considering proposed additions as they emerge. The selection criteria for designation follows those set down for statutory listing, with additional emphasis of local considerations for each criterion:

- **Architectural interest:** including architectural design, decoration, craftsmanship, aesthetic merits, technical significance/display of innovation and/or good example of a particular type of building or techniques or significant plan form.
- **Townscape and group value:** including important contributions to unified local architectural, townscape or historic groups, areas of planned townscape or good historical functional relationships. Some buildings have architectural or historic interest as a group. Collectively these buildings can therefore contribute significantly to the townscape, and merit listing as a group within the local list. The effect on the character of the local environment if a building were to be lost is a consideration.
- **Historic interest:** illustrating aspects of local/national social, economic, cultural or military history and/or have close historical associations with locally/nationally important people or events.
- **Age and rarity of the building:** the older a building is, and the fewer surviving examples of its kind, the more likely it is to have special interest. Those buildings built prior to 1840 are likely to be locally listed with those built after this date requiring progressively greater justification. Its authenticity (i.e. the degree to which it has been altered and the loss of fabric and features) is a consideration whereas the state of repair is not relevant.

#### **Locally Listed Parks & Gardens**

5.201 A Locally Listed Park or Garden is a park or garden which is deemed to be of local architectural or historical significance and interest, but which is not of sufficient importance or significance to warrant national statutory listing (i.e. grade I, II\* and II), but whose significance merits consideration in the planning process as identified in NPPF (paragraph 197). Unlike statutory listed parks and gardens, they are not identified by Historic England, but are instead identified by The Council and Surrey Gardens Trust as being an important part of the Borough's local heritage and landscape.

5.202 The criteria for the local list are set by Historic England along with The Gardens Trust. This stipulates that the site have at least one of the following:

- Evident historic features or design;
- Buried archaeology;
- Connections with famous designers or nurserymen;
- Connections with nationally or locally famous individuals;
- A design typical of a landscape style.

5.203 There are currently 52 entries on Guildford's local list. These include amongst others Loseley Park; and Guildford Castle Gardens.

**Non-designated heritage assets of archaeological interest (County Site of Archaeological Importance and Area of High Archaeological Potential)**

- 5.204 Within the borough there are two forms of non-designated heritage assets of archaeological interest. These are County Sites of Archaeological Importance and Areas of High Archaeological Potential. Both of which are identified by Surrey County Council.
- 5.205 The NPPF identifies two categories of non-designated heritage assets of archaeological interest, those that demonstrably of equivalent significance to scheduled monuments and all others.
- 5.206 In the case of those archaeological assets that are demonstrably of equivalent significance to scheduled monuments, these are broken down in 3 types:
- those that have yet to be formally assessed for designation
  - those that have been assessed as being nationally important and therefore, capable of designation, but which the Secretary of State for Digital, Culture, Media and Sport has exercised his/her discretion not to designate.
  - those that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979 because of their physical nature.
- 5.207 Those archaeological assets that don't satisfy the above criteria by default fall into the 'other' category, which by comparison will be the much larger category, although still subject to the conservation objective. There may also be occasions, where as a result of assessment and evaluation, the understanding of a site does change, meaning that an asset could potentially become identified as being demonstrably of equivalent significance to scheduled monuments.
- 5.208 Applicants seeking planning permission within areas of high archaeological potential are required to undertake a prior assessment of the possible archaeological significance of the site and the implications for their proposals. They may be required to submit a desk-based assessment to accompany any application submitted.

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

**Preferred option for non-designated heritage assets**

The Council's objective is to ensure that the value and significance of the borough's non-designated heritage assets are protected so that they continue to contribute to the richness of the historic environment and inform future development and regeneration of the borough by having a policy that:

- 1) Places a requirement for all proposals affecting non-designated heritage assets, and/or their setting, to be supported by a Statement of Significance and Impact that is proportionate to the significance of the asset and which justifies the changes to the asset.

- 2) Supports the safeguarding of non-designated heritage assets of local significance that have been identified as one of the following;
  - a) Locally Listed Building or Buildings of Merit identified in neighbourhood plans
  - b) Locally Listed Historic Park or Garden
  - c) County Site of Archaeological Importance
  - d) Area of High Archaeological PotentialOr which are identified during the pre-application or application processes
- 3) Stipulates that when determining applications, a balanced judgement is to be given to the scale of any harm against the degree and extent of any significance that the heritage asset possesses; any contribution it makes to the area, and the public benefits of the proposal.
- 4) Requires that County Sites of Archaeological Importance or Areas of High Archaeological Potential which are demonstrably of equivalent significance to Scheduled Monuments be considered against Policy D19 if effected by a development proposal.

### **Alternative options for non-designated heritage assets**

- 1) Not to have a specific policy and to solely rely upon national guidance in tandem with Policy D3 Historic Environment of the LPSS.

It could be sufficient for the Planning Authority to rely upon national guidance as currently set out in the National Planning Policy Framework (2019), along with Policy D3 of the LPSS. This option would allow for greater flexibility in the consideration of planning applications but could lead to more inconsistent decisions. Its generality is likely to also have the consequence of failing to provide enough specific guidance to enable development to respond to distinctive character of the borough. Despite strong protection, this option may not go far enough to proactively enhance the historic environment. This option would bring positive effects, but these effects would be less pronounced than the preferred option.

## **Justification for the choice of options and selection of preferred option**

### **Reasons the alternatives were selected**

'No policy' is the only reasonable alternative as no further options were identified.

### **Reasons for selecting the preferred option in light of the alternatives**

The protection provided by the NPPF and Policy D3 of the Local Plan are both rather general and do not provide sufficient detail as to how the historic environment should be conserved and enhanced in appropriate its significance. Whilst the NPPF does expand slightly upon issues regarding supporting information and enabling development the details are still fairly generalised. It is therefore deemed necessary to provide more operational detail on this matter to proactively shape development so that it safeguards these heritage assets and the historic environment.

## **Definitions**

### **Archaeological Interest:**

A heritage asset which holds or potentially could hold evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

### **Heritage Asset:**

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listings)<sup>146</sup>.

### **Historic Environment:**

All aspects of environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged and landscaped and planted or managed flora<sup>147</sup>.

---

<sup>146</sup> NPPF Annex 2: Glossary.

<sup>147</sup> NPPF Annex 2: Glossary.



**Non-Designated Heritage Asset:**

Are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets<sup>148</sup>.

**Public Benefit:**

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF<sup>149</sup>.

**Setting of a Heritage Asset:**

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral<sup>150</sup>.

**Significance:**

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance<sup>151</sup>.

**Question 31:**

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

Do you have any other comments or suggestions?

<sup>148</sup> NPPG Paragraph: 040 Reference ID: 18a-040-20190723.

<sup>149</sup> PPG Paragraph: 020 Reference ID: 18a-020-20190723.

<sup>150</sup> NPPF Annex 2: Glossary.

<sup>151</sup> NPPF Annex 2: Glossary.

## Chapter 6: Infrastructure and Delivery

### Community Facilities and Open Space, Sport and Recreation

#### Introduction

##### National policy context

- 6.1 National planning policy places importance on the provision of an accessible network of high-quality open spaces and opportunities for sport and physical activity. Planning authorities are required to plan positively to ensure that open space provision reflects current and future needs in order to support communities' health, social and cultural well-being. This is set out in the National Planning Policy Framework (NPPF) at paragraphs 8b, 83d, 92, 96, 97, 98, 99. Further guidance on open space, sport and recreation is also set out in Planning Practice Guidance.

##### Local strategies and evidence

- 6.2 In order to inform planning for open space, the Council has produced the Open Space, Sport and Recreation Assessment (OSSRA) 2017. The OSSRA looked at different typologies of open space across the borough, established minimum standards of provision for each and audited existing provision against those standards. The OSSRA states that the standards are minimum standards and the exceedance of those standards does not indicate a surplus in supply.

##### Relevant policies in Guildford Borough Local Plan 2003 (to be replaced in the new Local Plan)

- R2: Recreational open space provision in relation to large new residential developments
- R3: Recreational open space provision in relation to new small residential developments
- R4: Recreational open space provision in relation to new commercial developments
- R6: Intensification of recreational use
- R7: Built facilities for recreational use
- R8: Golf Courses
- R9: Noisy sports, adventure games and similar activities
- R10: Water based recreational activities

##### Relevant policies in Guildford Borough Local Plan: strategy and sites 2019

- Policy ID4 Green and Blue Infrastructure

##### Relevant Guildford Borough Council supplementary planning guidance

- Planning Contributions Supplementary Planning Document 2017

## Relevant Objectives from LPSS

- Objective 1:** To deliver sufficient sustainable development that meets all identified needs.
- Objective 2:** To improve opportunities for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities.
- Objective 3:** To ensure that all development is of high-quality design and enables people to live safe, healthy and active lifestyles.
- Objective 5:** To protect and enhance our heritage assets and improve the quality of our built and natural environment.
- Objective 7:** To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.
- Objective 12:** To facilitate the timely provision of necessary infrastructure to support sustainable development.

## Topic - Protecting open space

### Issues

- 6.3 Policy ID4 of the LPSS protects open space in line with NPPF policy. The NPPF<sup>152</sup> prohibits building on open space except where:
- an assessment has been undertaken that clearly shows the open space is surplus to requirements,
  - the loss would be replaced by equivalent or better provision in terms of quality and quantity,
  - or the development is for alternative sports and recreational provision, the benefits of which would clearly outweigh the loss.
- 6.4 The OSSRA audit of open space provision sets out the wards in which the minimum standards of provision have been met, but does not establish whether any sites are surplus to requirements. This situation has sometimes led to a lack of clarity over whether an Open Space would be considered surplus for the purposes of NPPF and ID4 policy.
- 6.5 The NPPF defines Open Space as “all open spaces of public value which offer important opportunities for sport and recreation and can act as visual amenity”. Policy ID4 clarifies that the definition applies to all open space within urban areas, land designated as open space on the policies map and all land and water that provided opportunities for recreation and sport as identified in the most recent OSSRA (paragraph 4.6.57). This can include land that is not publicly accessible but has public visual amenity.
- 6.6 The OSSRA recognised that some open spaces have a particular value (e.g. due to a unique heritage or biodiversity value) and recommended that these should be protected, even if they are considered to be surplus.
- 6.7 The OSSRA also recommended that priority is placed on protecting those open spaces where there is an existing shortfall of supply of the relevant typology within the ward, and open spaces where the loss would result in a shortfall. It assigns a quality value to the identified open spaces and also assigns a value for potential for improvement.
- 6.8 It is important to note that some development on open spaces can be beneficial for the role and function of the space. Where the development is for alternative sports and recreational provision it is not precluded by the NPPF or ID4. However, there is an opportunity to clarify that other types of beneficial development, such as engineering works to improve drainage or upgrades to sports or play facilities, will also be permitted.

---

<sup>152</sup> NPPF Paragraph 97.

## Policy ID5: Protecting Open Space

### Preferred option for protecting open space

The aim of this policy is to provide detail and clarity for policy ID4 in order to enhance protection of open space by having a policy that:

- 1) Clarifies that where provision of open space exceeds OSSRA minimum standards, it does not mean that an open space site will be considered surplus to requirements. An open space will not be considered surplus to requirements unless:
  - a) an analysis has shown that the land is no longer needed as open space, including consideration as to whether the site can be repurposed in order to correct deficits in other open space typologies, or the site is not of sufficient quality to be considered open space and cannot be improved, and
  - b) The loss of the space would not result in a deficit in open space in terms of accessibility, quality or quantity.
- 2) Requires any development on open space to achieve biodiversity net gains in line with Policy P7.
- 3) Does not permit the loss of any open space that has a specific nature conservation, historic, cultural or recreational value.
- 4) Clarifies that development will be acceptable on open spaces where the development is beneficial to the role and function of the site and its ancillary uses.

### Alternative options for protecting open space

- 1) To not define the conditions within which a surplus will exist and instead leave this to be considered on a case-by-case basis under the NPPF and Policy ID4.

## **Justification for the choice of options and selection of preferred option**

### **Reasons the alternatives were selected**

The NPPF provides clear policy for protecting open space and there is limited scope for further policy. The realistic options are the proposed policy, which is drawn from the Council's experience with proposals for development on open space, or no additional policy.

### **Reasons for selecting the preferred option in light of the alternatives**

It is considered important to clarify the conditions within which a surplus will exist in order to streamline the planning process. In past cases, discussion of the issues and the interpretation of the NPPF with applicants has taken up a large amount of officer time. Clarifying the policy will help to avoid lengthy discussions taking place in future.

### **Question 32:**

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

Do you have any other comments or suggestions?

## Topic - Open space in new developments

### Issues

- 6.9 Green infrastructure, of which open space is a key component, is defined in the NPPF glossary as “a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”. Open space in new development is primarily provided for sport, recreation and amenity but with appropriate design many open spaces can also provide other benefits in line with other local plan policies. In particular, open spaces in new developments are expected to contribute to the achievement of net gains in biodiversity (see Policy P7). The NPPF (para 98) requires plans to enhance public rights of way and access, for example, by adding links to existing networks. Open space, as publicly accessible spaces, may also make an important contribution to this.
- 6.10 The OSSRA sets out the typologies of open space and proposes standards for open space provision that meet identified needs.

### Typologies

- 6.11 The OSSRA identified the following typologies for which provision should be made in the Local Plan:
- Allotments
  - Amenity Green Space – informal, predominantly grassed, spaces open to free and spontaneous use
  - Park and Recreation Ground – formal parks and recreation grounds and outdoor sports space
  - Play Space (Children) – areas of play for children up to around 12 years old including formal play equipment and more natural play areas
  - Play Space (Youth) – informal recreation spaces for 13 to 17-year olds and formal spaces like skateboard parks, basketball courts etc.
  - (Accessible) Natural Green Space - natural spaces for informal recreation
- 6.12 Further detailed descriptions of the typologies can be found in the OSSRA from page 35 onwards.
- 6.13 The OSSRA found that private open space (for example, sports pitches owned by a club) play an important role in meeting sport and recreation needs in our borough. Private grounds often offer informal permissive access (e.g. for dog walking) and the public may not always make the distinction between privately managed grounds and those managed by the Council or parish. Private space of public value as open space is considered to be those spaces provided by private providers for outdoor sport that are accessible to all members of the public either through some form of community agreement or available for hire at genuinely accessible rates. Private space considered to have no public value includes land that is not openly accessible to the public and/or requires membership or hire at rates that would not be affordable to some sections of the community.

- 6.14 The Council has a statutory duty to provide a sufficient number of allotments to meet demand. The statutory definition of an allotment differs depending on the area but for our borough it is defined as an area of land greater than 20 poles (100.5 square metres)<sup>153</sup>. An allotment must be wholly or mainly cultivated by the occupier for the production of vegetable or fruit crops for consumption by him/her or his/her family.
- 6.15 An allotment of 20 poles is a large area of land that needs dedication and a large investment of time to effectively manage, and as a result is not likely to be suitable for everyone who wants to grow food. Houses or flats with their own private gardens can use some of that space for growing, but for residents of flats or apartments that don't have private outdoor spaces, smaller plots or community growing spaces (shared plots) may be more attractive than statutory allotments.
- 6.16 Growing food reduces food miles and associated carbon emissions and as such can be considered a climate change mitigation action. Additionally, when provided in an urban setting, such spaces can provide urban cooling and urban greening which have benefits for climate change adaptation and biodiversity. Shared spaces may also bring social benefits in terms of community cohesiveness and in very dense developments may provide a use for rooftop space that may otherwise be wasted.
- 6.17 Given the need for different sizes of growing space, there is benefit in flexibility to allow for different types of growing space to be delivered. However, this should not jeopardise the Council's ability to meet its statutory obligation to provide allotments that meet the legal definition. Additionally, it is important that the need for growing space is met through dedicated spaces so that private residential gardens, which provide amenity and biodiversity benefits, are not lost to food production.

### **Open space standards**

- 6.18 The NPPF states that plans should seek to accommodate open space, sport and recreational provision based on needs identified in up-to-date assessments. The OSSRA sets out locally developed standards for different typologies of open space per 1,000 people. By ensuring that new residential development delivers open space that meets these standards, the plan can ensure that the supply of open space keeps up with population growth.
- 6.19 The OSSRA introduces standards on provision of open space for all typologies, except Natural Green Space, for which it refers to the established Access to Natural Green Space Standards<sup>154</sup> (ANGSt) produced by Natural England. The thresholds for onsite provision proposed in the OSSRA have been amended slightly in the policy to reflect the types of sites allocated in the LPSS and the Council's experience of negotiating with developers on the provision of allotments.

---

<sup>153</sup> The legislation places different requirements on different councils. This requirement applies to Guildford Borough Council because it is a district council that a) has a population above 10,000 and b) has parishes.

<sup>154</sup> See OSSRA page 64 for the ANGSt standards.



- 6.20 The occupants of commercial buildings also need open space, for recreation during lunch and to provide a more pleasant and healthy working environment. Open space also makes commercial developments more visually appealing and can provide a contribution towards improving green infrastructure networks, helping to green our settlements.
- 6.21 The OSSRA shows that every ward in the borough has an identified shortage of at least one typology of open space. Wherever there is flexibility on the delivery of different types of open space priority should be given to correct the deficits if possible. While developers cannot be asked to make contributions that correct pre-existing problems, there is scope for negotiation on the type of open space delivered without increasing the total level of obligation placed on developers.
- 6.22 Not all developments can provide new open space on-site and this is largely dictated by the size of the development. Therefore, it is appropriate for consideration for on-site open space provision to be based on the number of units delivered (a good indicator of site size). However, the amount of open space needed is dictated by the expected number of users, so occupancy of new developments should be used to indicate the amount of open space provided.
- 6.23 Where sites are too small to provide open space onsite, it is common practice for Councils to take an equivalent financial contribution instead. Money from smaller developments can be collected to provide offsite open spaces or improvements to existing spaces. The OSSRA sets out an audit of existing open spaces and identifies those that have potential for improvement. The financial contributions will be set out in the Planning Contributions Supplementary Planning Document.
- 6.24 Residential developments of fewer than 11 units cannot realistically provide any of the typologies of open space on-site and national policy states that we should not seek financial contributions for these developments<sup>155</sup>.

#### **Quality and design of open spaces**

- 6.25 It is important that new open spaces are of sufficient quality to meet the function for which they are provided. The OSSRA (chapter 6) sets out quality criteria for different types of open space. It is particularly important that amenity green spaces are a minimum of 0.15 ha in size otherwise they cannot reasonably be used as areas of play.
- 6.26 On a wider scale, open spaces should be linked together wherever possible, and linked into the wider footpath and cycle network, in order to maximise benefits for health and to provide green links throughout developments that provide permeability for wildlife.

### **Policy ID6: Open Space in New Developments**

- 6.27 The Council's preferred approach is to adopt the open space standards that were established through the OSSRA, with additional policy that steers provision of new open space towards correcting typology deficits, and to promote the delivery of growing spaces.

---

<sup>155</sup> Written Ministerial Statement 28 November 2014.

## Preferred option for open space in new developments

The aim of this policy is to ensure that new developments provide new open spaces that provide best value in terms of multi-functional benefits by having a policy that includes the following provisions:

### Residential developments

- 1) Supports provision of new open space that meets the need for open space as set out in this policy.
- 2) Developments that reach the thresholds in the table below will generally be expected to provide new open space of the following typologies on-site. Where no on-site provision for a particular type of open space can be provided, a financial contribution will be sought for provision of new and/or improvement to existing open spaces off-site.

Open space typology	11-49 dwellings	50-249 dwellings	250+ dwellings	Strategic sites (In LPSS) <sup>156</sup>
Amenity/Nat. Green Space	✓	✓	✓	✓
Parks & Rec. Grounds	X	X	✓	✓
Play Space (children)	X	✓	✓	✓
Play Space (Youth)	X	X	✓	✓
Allotments	X	X	X	✓

- 3) Where new open space is provided, it should meet the following quantity and access standards:

Typology	Quantity standards (ha/1000 people)	Access standard (maximum distance from the new homes)
Allotments	0.25	480 metres or 10 minutes' walk time
Amenity Green Space	1 (total)	720 metres or 15 minutes' walk time
Natural Green Space		ANGSt standard
Parks & Recreation Grounds	1.35 public & private of which a minimum of 0.8 is public	720 metres or 15 minutes' walk time
Play Space (Children)	0.05	480 metres or 10 minutes' walk time
Play Space (Youth)	0.03	720 metres or 15 minutes' walk time

<sup>156</sup> Site Allocations: A24 – Slyfield Area Regeneration Project; A25 – Gosden Hill; A26 – Blackwell Farm; A31 – Land to the South and East of Ash and Tongham; and A35 – Former Wisley Airfield.

- 4) The parks and recreation grounds standard includes an allowance for playing pitches. Further detail regarding the need for playing pitches of different types will be set out in the Council's Playing Pitch Strategy. A minimum of 0.8ha/1000 of the total 1.35ha/1000 must be for public space. Contributions towards private sport provision will be acceptable where there is clear public benefit, for example through inclusion of a community access agreement that enables participation by all members of the community.
- 5) New developments are expected to provide an element of community growing space where appropriate. This may be particularly appropriate for denser developments where residents may have limited access to private gardens of their own, where smaller plots and shared growing spaces would be attractive and where maintenance arrangements are put in place to prevent the spaces falling into neglect.
- 6) The occupancy rates of new homes (used to calculate the total number of residents) are required to be based on the most recent census information or other robust data, taking into account the likely child yield as a result of the housing mix when considering child and youth play space.
- 7) Proposals for new open space are expected to aim to correct any existing deficiencies in specific types of open space in the locality of the development. The Council will work with applicants to identify open space needs and will support proposals that deviate from the mix of typologies set out in this policy where deficiencies are corrected, and the full provision of open space is made.

#### **Commercial developments**

- 8) Commercial sites will be encouraged to provide areas of amenity open space of an appropriate size, scale and character within or adjacent to the development. The level of provision will be decided on a case-by-case basis.

#### **Quality and design of new open space**

- 9) New open spaces are required to be multi-functional spaces that deliver a range of benefits including biodiversity gains, flood risk improvements, climate change measures and social inclusivity.
- 10) New open spaces are required to meet minimum size, design and quality standards as set out in the Open Space, Sports and Recreation Assessment. In particular, areas of land proposed for Amenity Green Space must be greater than 0.15ha in size. New open spaces should be safe and secure for all members of the community.

- 11) Open spaces are expected to support and enhance the existing rights of way network, providing new footpaths and cycle links where possible, with regard to the Council's identified opportunities for high quality walking and cycling networks (see Policy ID10) and where compatible with the specific purpose of the open space. Sites are expected to be designed to link up open spaces as much as possible.

### **Alternative options for open space in new developments**

- 1) To not have a policy governing provision of open space and instead leave it to negotiation on a case-by-case basis using the provisions of the NPPF.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the alternatives were selected**

The reasonable options for open space provision are to have set standards or to not have set standards and negotiate on a case by case basis. The Council's evidence base sets out proposed new standards, there is an established set of standards in the Local Plan 2003, which are the realistic options for standards in the new plan.

#### **Reasons for selecting the preferred option in light of the alternatives**

The new standards are based on the most recent evidence and are therefore considered most likely to be found sound. The NPPF requires policies to be underpinned by up-to-date evidence.

### **Question 33:**

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

Do you have any other comments or suggestions?

## Topic - Sport, recreation and leisure facilities

### Issues

6.28 The Local Plan 2003 includes the following retained policies dealing with a very specific type of development.

- R6 Intensification of recreational use (which deals with improvement to recreational facilities through new floodlighting and all-weather surfaces),
- R7 Built facilities for recreational use (which deals with replacement and extensions to existing recreational buildings within settlements),
- R8 Golf courses (which sets out the design and extent of new golf course developments),
- R9 Noisy sports, adventure games and similar activities, and
- R10 Water based recreational activities.

6.29 It is likely that many of the issues covered by the policies above would apply to a broad range of recreation and leisure developments. In particular, policy R8 ensures that built development is restricted wholly to the primary use of the proposal and is not extended to allow for additional, non-ancillary activities, the impacts of which may not have been assessed during the planning application, and the Council's view is that the same test should apply to all large sport, recreation and leisure facilities. Therefore, the preferred approach is to have a single policy that addresses recreation and leisure facilities in general rather than a suite of policies each covering different types of development.

6.30 Around 84 per cent of the borough is covered by Green Belt within which many forms of development are considered inappropriate under national planning policy. The NPPF (paragraphs 145 and 146) states that change of use of land for uses such as outdoor sport and recreation, and the provision of facilities for outdoor sport and recreation, may not constitute inappropriate development as long as it preserves the openness of the Green Belt. As a result, it is feasible that new sport, recreation and leisure facilities could be proposed in Green Belt areas. While the plan is read as a whole, and national and Local Plan policy on Green Belt will apply, there is an opportunity to set out criteria for new sport and recreation facilities to ensure that impacts are limited and provide clarity for applicants on how potential impacts should be addressed.

6.31 The borough is in an area of severe water stress. Some recreational uses, such as golf courses, are extremely heavy water users. Climate change is expected to exacerbate water stress and it is important that the impact on existing water stocks is limited. Therefore, recreation and leisure uses that are heavy users of water should include their own water storage (e.g. reservoirs) in order to be considered sustainable development. Some golf courses in our borough already do this. Reservoirs are usually considered engineering operations that can require planning permission.

### Policy ID7: Sport, Recreation and Leisure Facilities

6.32 The Council's preferred approach is to have a single policy to address the planning issues that may arise when considering applications for new sport, recreation and leisure facilities.

### **Preferred option for sport, recreation and leisure facilities**

To have a policy that supports development that provides, increases or improves opportunities for public sport, recreation and leisure, including schemes for new, replacement and extensions to existing facilities, and engineering works, if:

- 1) they support and enhance the existing rights of way network, providing new footpaths and cycle links where possible with reference to Policy ID10: Cycle Networks.

Large sport, recreation and leisure facilities are expected to:

- 2) restrict built development to that wholly necessary to support the recreational or leisure use and ancillary activities, and
- 3) for developments that will have high water usage, include water collection and storage measures in order to avoid abstraction from surface water bodies or groundwater or recourse to the public water supply.

### **Alternative options for sport, recreation and leisure facilities**

- 1) To not have a policy specifically addressing sport, recreation and leisure facilities and instead rely on other Local Plan policies and the NPPF.

### **Justification for the choice of options and selection of preferred option**

#### **Reasons the alternatives were selected**

The NPPF and other Local Plan policies include provisions that could address sport, recreation and leisure facilities so there is an option of not having a specific policy in this area.

#### **Reasons for selecting the preferred option in light of the alternatives**

The preferred policy supports improvements to sport, recreation and leisure facilities which will promote general well-being. In particular, it includes additional guidance previously only applied to golf courses that restricts built development to that necessary to support the main use in order to protect the Green Belt.

### **Question 34:**

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

Do you have any other comments or suggestions?

## Topic - Community facilities

### Introduction

#### National policy context

- 6.33 National planning policy states that the Council should enable the retention and development of accessible community facilities as well as guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. Furthermore, the Council should ensure that established facilities and services are able to develop and modernise and are retained for the benefit of the community. This is set out in the National Planning Policy Framework at paragraphs 83 and 92.
- 6.34 Community facilities are viewed as integral to promoting healthy, inclusive and safe communities in line with paragraph 91 of the NPPF. Further guidance on healthy and safe communities is also set out in Planning Practice Guidance.

#### Local strategies and evidence

- Guildford borough Infrastructure Delivery Plan (2017)
- Surrey Infrastructure Study (2017)

#### Relevant policies in Guildford Borough Local Plan 2003 (to be replaced in the new Local Plan)

- CF1: Provision of new community facilities
- CF2: Loss of community facilities
- CF3: Pre-school education
- CF4: Expansion of schools
- CF5: Care in the community

#### Relevant policies in Guildford borough Local Plan: strategy and sites 2019

- E5: Rural economy
- ID1: Infrastructure and delivery
- Site allocations

#### Relevant Guildford Borough Council supplementary planning guidance

- Planning Contributions SPD (2017)

### Relevant Objectives from LPSS

- Objective 1:** To deliver sufficient sustainable development that meets all identified needs.
- Objective 2:** To improve opportunities for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities.
- Objective 3:** To ensure that all development is of high-quality design and enables people to live safe, healthy and active lifestyles.
- Objective 5:** To protect and enhance our heritage assets and improve the quality of our built and natural environment.
- Objective 7:** To ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.
- Objective 12:** To facilitate the timely provision of necessary infrastructure to support sustainable development.

### Issues

- 6.35 This proposed policy deals with particular types of community facility as identified in the definitions section below. They are part of a wider family of uses which have been considered in an integrated manner across Local Plan policies.
- 6.36 In Guildford, significant new growth is planned over the next 15 years. The Council have already planned and made provision for required key supporting infrastructure with its partners, such as Surrey County Council. This includes for the delivery of a range of community facilities, including new and expanded schools, health care facilities and other community uses, catering for planned growth and needs in the borough. In this regard, the LPSS:
- includes site allocations for new community facilities and associated requirements;
  - identifies required new and expanded facilities on which delivery of the plan depends in its Infrastructure Schedule; and
  - requires contributions toward facilities from related new development in line with Policy ID1.
- 6.37 The detailed location and design of facilities at the site level will be guided by:
- Local Plan design and infrastructure policies (including existing Policies D1, D2, ID3 to be supplemented by emerging development management policies);
  - guidance in the Council's Strategic Development Framework supplementary planning document; and
  - Detailed masterplans prepared by applicants for particular sites.



- 6.38 Amongst other matters, these measures ensure that new and expanded community facilities will:
- reflect high quality, safe, accessible and inclusive design to meet the needs of all users;
  - respond to the need for low carbon, sustainable buildings in the context of climate change; and
  - have due regard to promoting sustainable transport and managing related transport impacts.
- 6.39 The Council recognise that local communities are often best placed to identify buildings or land that furthers their social wellbeing or social interests as well as neighbourhood infrastructure needs. In this regard, area and neighbourhood infrastructure needs may be set out in Neighbourhood Plans. Furthermore, there is a process available for communities to nominate such land or buildings as Assets of Community Value (ACVs) and for the Council to list these as ACVs. Whilst this is separate to the planning application process, the listing of ACVs provides an indication of the significance of buildings and land, including community facilities, to the local community. This listing may be regarded as a material consideration when making planning decisions.
- 6.40 The Council considers that further policy is necessary to provide greater support to the planning of new or expanded community facilities and the retention of existing facilities. This is for several reasons, in the context of the challenges and imperatives in Guildford.
- 6.41 Firstly, it is critical to ensure that community facilities effectively serve and are accessible to all Guildford's residents, with special consideration to groups with protected characteristics. Whilst there continues to be emphasis on delivering services online, physical infrastructure will remain important as a basis for meeting a range of residents' health, education, social and cultural needs and as places that contribute to fostering social cohesion. It is important that these places are accessible, particularly to those that do not have access to private mobility<sup>157</sup>. Ensuring that facilities are located so as to be easily accessible to residents also encourages the use of sustainable modes of transport, contributes to the health of residents, as well as reduces carbon emissions related to transport.
- 6.42 Secondly, and linked to the above, the accessibility of facilities is improved not only by their location in relation to the transport network, but also by means of their co-location with compatible uses and other facilities. This could include the provision of childcare facilities as part of new major office development<sup>158</sup> or co-locating community facilities (such as a place of worship, community hall, and library) in one place or building potentially associated with other amenities such as parks and playgrounds. This principle of co-location increases levels of convenience for users who can make one trip for multiple purposes, promotes social integration, as well as contributes to place-making. It also enables the potential for sharing of space and other infrastructure between facilities thereby contributing to cost-effective delivery of services.

---

<sup>157</sup> Whilst acknowledging the distinct operating needs and locational requirements of certain facilities such as the provision of emergency services, and other specialised facilities.

<sup>158</sup> As provided for in the Local Plan: Strategy and Sites at Policy E2(7).

- 6.43 Thirdly, it is recognised that there may be challenges relating to ensuring sufficient funding for ongoing operational costs associated with community facilities. Ensuring efficiency in relation to the provision of services is a matter that providers, such as SCC consider on an ongoing basis. To support this, there may also be opportunities that could be explored at a site level for revenue generation from activities or uses that complement a community facility, for instance a food and drink use such as tea-room as part of a library facility<sup>159</sup>.
- 6.44 Finally, in the context of potentially increasing financial pressures and changing priorities, the loss of existing community facilities is a threat. To ensure Guildford's residents' needs are met, it is important to ensure that existing land and facilities for community purposes is not lost to other uses without careful consideration of local needs and options for retaining the opportunity in community use. Land values in Guildford are generally high and community uses may struggle to compete with other uses, particularly housing. Should facilities be lost, it is likely to be challenging and costly to obtain suitable alternative land for community uses in the future. Apart from cost issues, scarcity of suitable land is a challenge considering the policy imperatives of guarding against the loss of other uses such as shops, offices, and housing as expressed in the LPSS, as well as the presence of important protective designations in the borough.

## Policy ID8: Community Facilities

- 6.45 The Council's preferred approach is to prepare a policy that will enable the provision of accessible and viable community facilities, whilst protecting against the loss of existing facilities. This is set out below.

### Preferred option for community facilities

The aim of this policy is to enable access to community facilities, supporting healthy and inclusive communities, by having a policy that:

#### Proposals for new community facilities including their replacement or expansion

- 1) Supports permission for community facilities within urban areas and villages provided that:
  - a) they are appropriate in design terms;
  - b) there are no unacceptable transport impacts; and
  - c) there are no undue detrimental impacts on amenities of neighbouring properties.
- 2) Enables the provision of accessible and viable community facilities by:
  - a) expecting that they are located and designed so that they can be conveniently accessed via public transport, walking and cycling;

<sup>159</sup> Should these uses be main town centre uses, they would need to comply with the Local Plan's economic policies.

- b) encouraging their co-location with compatible and mutually supportive facilities or uses;
- c) supporting complementary or ancillary uses, closely associated with or as part of the facility, provided they do not detract from the facility and its primary function.

#### **Proposals for the loss of community facilities**

- 3) Resists the loss or change of use of community facilities, with proposals for such potential loss or change of use required to demonstrate that:
  - a) the retention of the facility has been explored without success by offering it for sale or lease for its existing community use for at least 18 months;
  - b) offering it for sale or lease under (a) has included consideration of alternative suitable community facility uses, before change of use to residential or other use with no ongoing community facility use is permitted; and
  - c) adequate alternative provision is demonstrated to exist in the locality or is made available in an agreed suitable location.

#### **Alternative options for community facilities**

- 1) To not have a specific policy covering this issue but to consider planning applications against the NPPF, Planning Practice Guidance and other relevant policies in the LPSS.

#### **Justification for the choice of options and selection of preferred option**

##### **Reasons the options were selected**

'No policy' is the only reasonable alternative as no further options were identified.

##### **Reasons for selecting the preferred option in light of the other options**

The Council's preferred option is to have a specific policy relevant to Guildford. This approach provides further detail to that which is present in the NPPF. The preferred option seeks to:

- ensure that services are accessible to residents to support their health and wellbeing.
- promote the sustainability and viability of community facilities and enable local economic opportunities.
- promote social inclusion and vibrant communities through enabling a range of complementary services and activities at and related to accessible community facilities.

## Definitions

### Community facility:

For the purposes of this policy, community facilities include education, health and welfare facilities, meeting halls, libraries youth and community centres (generally, those uses within Class D1 of the Town and Country Planning Use Classes Order and certain uses within use Class C2).

Whilst uses beyond those referred to above may be regarded as community facilities more generally, for the purposes of this policy and for clarity in Local Plan policy guidance, several types of facility are dealt with separately and this policy is not applicable unless specifically stated. These include sport, recreation and leisure facilities (as addressed in Policy ID7), visitor, leisure and cultural attractions (as addressed in Policy E6) and public houses (as addressed in ID9).

### Question 35:

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

Do you have any other comments or suggestions?

## Topic - Retention of public houses

### Introduction

- 6.46 Public houses have been an intrinsic part of Britain's social and cultural heritage for almost 2,000 years<sup>160</sup> and are often a focal social meeting point for local communities. They typically add character, vibrancy and a place for employment as well as social interaction. Many also provide space for clubs, activities and live performances, and some pub buildings also make important architectural contributions to the local area.
- 6.47 However, the success of the pub industry is under continuous threat nationally. More than 11,000 pubs in the UK closed in the last decade, from around 50,000 in 2008 to around 39,000 in 2018 – representing a fall of almost a quarter (23%)<sup>161</sup>. The South East has been the second hardest hit UK region after the North West for pub closures<sup>162</sup>. There are a number of factors that have contributed to this trend, including the economic recession from 2008, taxation on drinks prices combined with intense price competition from supermarkets and increased home consumption of alcohol, the smoking ban, modern attitudes towards reduced drinking and legal limits on 'drink driving', which particularly affect rural pubs<sup>163</sup>.
- 6.48 Since January 2012, the Council determined 16 planning applications for development involving the loss of a public house, of which 13 (81%) were successful and the buildings have either been converted or have planning permission to be converted to another use. A further five public houses were successfully nominated by the local community since April 2016 as Assets of Community Value (ACVs) and are now on Guildford Borough Council's list of ACVs<sup>164</sup>. This illustrates both the local support that pubs have and the extent of pressure for conversion to other uses that they have come under in recent years.
- 6.49 The ongoing loss of pubs is a concern to the Council and has also been raised as a concern by both local borough residents and the Surrey/Hants Borders branch of the Campaign for Real Ale (CAMRA), in comments on planning applications and in response to the public consultation on the LPSS.

---

<sup>160</sup> Source: <https://www.historic-uk.com/CultureUK/The-Great-British-Pub/>

<sup>161</sup> Source: Office for National Statistics data, November 2018  
(<https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/articles/economiesofalesmallpubscloseaschainsfocusonbigbars/2018-11-26>)

<sup>162</sup> Source: CAMRA

<sup>163</sup> Source: Pubs in Tower Hamlets: An Evidence Base Study, April 2017  
([https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Pubs\\_in\\_Tower\\_Hamlets\\_Evidence\\_Study\\_2016.pdf](https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Pubs_in_Tower_Hamlets_Evidence_Study_2016.pdf))

<sup>164</sup> Available online at: [https://www.guildford.gov.uk/media/20239/List-of-Assets-of-Community-Value/pdf/List\\_of\\_Assets\\_of\\_Community\\_Value.pdf?m=636900565322200000](https://www.guildford.gov.uk/media/20239/List-of-Assets-of-Community-Value/pdf/List_of_Assets_of_Community_Value.pdf?m=636900565322200000).

### **National policy context**

- 6.50 Paragraph 92 (c) of the NPPF states that planning policies and decisions should “guard against the unnecessary loss of **valued facilities and services**, particularly where this would reduce the community’s ability to meet its day-to-day needs”.
- 6.51 Paragraph 83 (d) of the NPPF states that planning policies and decisions should enable “the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, **public houses** and places of worship”. This paragraph clearly defines public houses as a community facility, however as it comes under the chapter subheading of “supporting a prosperous rural economy”, the paragraph will not carry weight for retention of public houses in urban areas.

### **Local strategies and evidence**

#### **Relevant policies in Guildford Borough Local Plan 2003 (to be replaced in the new Local Plan)**

- N/A

#### **Relevant policies in Guildford borough Local Plan: strategy and sites 2019**

- Policy E5: Rural economy.

#### **Relevant Guildford Borough Council supplementary planning guidance**

- Not applicable.

### **Relevant Objectives from LPSS**

- Objective 2:** To improve opportunities for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities.
- Objective 4:** To retain the distinct character and separate identities of our settlements.
- Objective 10:** Support and expand the economic vitality of our rural areas whilst protecting existing heritage, landscape and character.

## Issues

### Removal of permitted development rights

- 6.52 On 23 May 2017, the Government enacted legislation<sup>165</sup> which removed permitted development rights for buildings in the A4 use class (pubs and other drinking establishments) that are not listed as, or nominated to become, Assets of Community Value (ACVs). This means that planning permission is now a legal requirement for the redevelopment or change of use of all public houses, rather than just those listed or nominated as ACVs (which already required planning permission for such development<sup>166</sup>). The 2017 order also introduced a new permitted development right<sup>167</sup> for the change of use of a pub (in use class A4) to a pub with café/restaurant use. This demonstrates the Government's recognition of the importance of pubs to local communities.
- 6.53 While this legislative change may have negated the need for a pub to be listed as an ACV to prevent inappropriate redevelopment or change of use, listing as an ACV can still provide some protection, as local planning authorities may consider ACV listing as a material consideration when assessing planning applications. Furthermore, when a listed ACV is to be sold, local community groups must first be given the opportunity to bid to purchase it on the open market<sup>168</sup>. This offers an extra layer of protection for communities wanting to keep venues operating as pubs. At the time of drafting this policy, most of the ACVs on Guildford Borough Council's list of ACVs were pubs.

### Scope of existing planning policies

- 6.54 The requirement for planning permission allows local authorities to carefully consider proposals that would result in the loss of pubs against Local Plan policies. However, this protection relies on an effective Local Plan policy being adopted. The extant community facilities policies of the 2003 Local Plan (Policies CF1-CF5) apply only to buildings falling within use classes C2 and D1 of the Town and Country Planning Use Classes Order and therefore exclude pubs, which fall within use class A4.
- 6.55 Policy E5 (1) (c) of the LPSS and paragraph 83 (d) of the NPPF both support the retention of public houses in rural areas; however this policy wording, as with the statement in paragraph 92 (c) of the NPPF on guarding against "...the unnecessary loss of valued facilities and services" is general and does not include clear criteria or requirements on applicants with which to assess proposals involving loss of public houses. Furthermore, the protection in these policies applies only to facilities in rural areas, whereas pubs can also be important social foci for communities in urban areas, particularly where these areas have few other local amenities within reasonable walking distance.

---

<sup>165</sup> The Town and Country Planning (General Permitted Development) (England) (Amendment) (No 2) Order 2017.

<sup>166</sup> Permitted development rights for pubs listed or nominated as ACVs were previously removed under Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015.

<sup>167</sup> Under Schedule 2, Part 3, Class AA of the GDPO 2015 (As amended).

<sup>168</sup> See Part 5, Chapter 3, Section 95 of the Localism Act 2011 (<http://www.legislation.gov.uk/ukpga/2011/20/part/5/chapter/3>) and Community Right to Bid: Non-statutory advice note for local authorities (DCLG, October 2012) ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/14880/Community\\_Right\\_to\\_Bid\\_-\\_Non-statutory\\_advice\\_note\\_for\\_local\\_authorities.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/14880/Community_Right_to_Bid_-_Non-statutory_advice_note_for_local_authorities.pdf)).

- 6.56 It would therefore be in keeping with paragraph 92 (c) of the NPPF (see National Policy Context) that the policy means to protect against the loss of valued pubs in both rural and urban areas outside the town centre be strengthened through specific wording that would require developers to assess the value of the facility to the local community.

#### **Period of required marketing**

- 6.57 For all areas of the borough, a retention policy should require applicants to undertake an appropriate period of marketing in order to test a public house's commercial viability prior to submitting an application for demolition, redevelopment or change of use. The Council considers 18 months to be an appropriate length of marketing for a pub proposed to be lost in this way, based on its assessment of similar policies within other local planning authorities' Local Plans. This period of time also takes account of the fact that, insofar as they are community facilities, it is likely that public houses would require a longer overall period of marketing than B-class employment of isolated retail use (which both require a minimum marketing period of 12 months under LPSS policies E3, E5 and E9), given that the preferred option for the community facilities policy also requires applicants to undertake public consultation and an assessment of alternative premises in the local area, in order to ascertain the value of the public house to the local community, depending on the site's location. In addition, if the public house is listed as an ACV, or becomes nominated to become an ACV following receipt of a planning application for demolition and/or change of use, then further time may be necessary to allow local community groups the opportunity to bid to purchase the premises with the intention of retaining the pub business.
- 6.58 Some applicants may seek changes which would reduce the size of a public house or its plot, often involving the loss of upper storeys (living accommodation, meeting rooms, kitchens). These changes may well threaten the viability of the business. In some cases, it may be the longer term aim of the applicant to secure redevelopment of the entire property for a more profitable use, even in cases where the public house is financially viable and of value to the local community. For this reason, the Council considers that to protect a public house's current viability, a policy that requires evidence of marketing for its loss should require the same period of marketing for loss of part of the building(s) and/or the site to other uses.

### **Policy ID9: Retention of Public Houses**

- 6.59 The Council's preferred approach is to develop a policy that would require planning applications involving the loss of a pub (by means of change of use to an alternative use and/or demolition), to be accompanied by clear evidence to demonstrate that the existing public house use is no longer viable or of value to the community. This is set out further below.



### **Preferred option for retention of public houses**

The preferred option is to develop a policy that resists applications for redevelopment or changes of use of public houses to alternative uses, except where their continued use as a pub is no longer economically viable.

The policy would include the following specific requirements:

- 1) Applications for development involving the loss or partial loss of a public house will be required to provide evidence that the building has been marketed actively and comprehensively as a public house and alternative community facility for a continuous period of at least 18 months, ending close to or immediately prior to submission of the application or pre-application enquiry. For marketing of a public house to be considered active and comprehensive, it will be required to fulfil the relevant criteria in the Council's Marketing Supplementary Planning Document.
- 2) For public houses located outside the boundary of the town centre, applicants will also be required to undertake and provide details of:
  - d) public consultation to ascertain the value of the public house to the local community;
  - e) an evaluation of the public house's continued viability, with consideration of its existing and potential trade; and
  - f) an assessment of alternative licensed premises within easy walking distance of the public house which is the subject of the application; and whether such alternative premises offer similar facilities (for example restaurants, function rooms, beer gardens) and a similar community environment.
- 3) The loss of part of a public house, including car parking or other facilities complementary to its operation as a public house, will be resisted where it would adversely affect such operation, unless the marketing required under this policy demonstrates the public house use to be unviable.

### **Alternative options for retention of public houses**

- 1) To not have a specific policy covering this issue but to consider planning applications against other relevant policies in the Local Plan Strategy and Sites 2019, as well as the National Planning Policy Framework and Planning Practice Guidance.

## **Justification for the choice of options and selection of preferred option**

### **Reasons the options were selected**

'No policy' is the only reasonable alternative as no further options were identified.

### **Reasons for selecting the preferred option in light of the other options**

The LPSS did not include a community facilities policy, and policy E5 of the LPSS, which supports the retention of public houses in rural areas, does not include specific criteria against which applications involving the loss of public houses could be assessed.

The NPPF does contain some text within paragraphs 83 (d) and 92 (c) that could support a refusal of a planning application for loss of a public house on the basis of it being a community facility, if other factors supported a decision to refuse the application; however, paragraph 83(d) applies only to public houses in rural areas, and the wording of both of these paragraphs of the NPPF places the onus on the Council to demonstrate community support for the facility, rather than on the developer to prove that the facility is not well used. There is also no reference in the NPPF to a pub's commercial viability as a test for whether change of use may be appropriate.

## **Definitions**

### **Evidence of active and comprehensive marketing:**

For marketing of a public house to be considered to have been carried out actively and comprehensively in accordance with the first criterion of this proposed policy, it will be required to fulfil the detailed criteria for marketing set out in the Council's Marketing and Viability Supplementary Planning Document (SPD).

### **Evidence of continued viability:**

Evaluation of a public house's viability, as required by criteria 2) b) of this proposed policy, should be undertaken by following the CAMRA Public House Viability Test, or a similar evaluation method.

### **Question 36:**

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

Do you have any other comments or suggestions?

## Topic - Achieving a comprehensive Guildford borough cycle network

### Introduction

- 6.60 Policy M6 Provision for Cyclists and Pedestrians, and the accompanying Proposals Map in the 2003 Local Plan, showed specific routes for which cycle improvements would be supported by Guildford BC. This policy was superseded by Policy ID1 Infrastructure and delivery in the LPSS.
- 6.61 Whilst the Infrastructure Schedule in the Local Plan: Strategy and Sites includes projects to provide a comprehensive Guildford borough cycle network, that network is presently not mapped or otherwise described in the Development Plan. Rather, it was intended that this network be developed along the principles set out in Surrey CC's Guildford Local Cycling Plan (Surrey County Council, undated circa 2015) and its accompanying online plans. Subsequently, in 2018-19, Guildford BC's Route Assessments Feasibility Study (Transport Initiatives and Urban Movement, 2019) has produced a somewhat different, and denser, network for the Guildford urban area than that identified in the Surrey CC's Guildford Local Cycling Plan.
- 6.62 It is proposed that these two evidence sources – Surrey CC's Guildford Local Cycling Plan and Guildford BC's Route Assessment Feasibility Study – could be combined, then referenced in a new policy with the resulting plan(s) for cycle network improvements added to the Policies Map for the Development Plan. This could help facilitate the realisation of a comprehensive Guildford borough cycle network.

### National policy context

- 6.63 National planning policy requires plan makers to realise planning policies which should provide for high quality walking and cycling networks and supporting complementary facilities such as cycle parking. This is set out in the NPPF at paragraph 104.
- 6.64 The Government's Cycling and Walking Investment Strategy (2017)<sup>169</sup> has the ambition to make cycling and walking the natural choices for shorter journeys or as part of a longer journey. It identifies that multiple benefits that can be realised through increased levels of walking and cycling: cheaper travel and better health for people, increased productivity and increased footfall in shops for businesses, and lower congestion, better air quality, and vibrant, attractive places and communities for society as a whole.

### Local strategies and evidence

#### Local Transport Plan

- 6.65 Surrey CC, as the Local Transport Authority, has responsibility for transport policy and initiatives through the Surrey Transport Plan, which is the county's third Local Transport Plan (LTP). The LTP is a statutory document. The third LTP, or LTP3 for short, covers the period from 2011 to 2026. Surrey CC's LTP3 takes a modular form, with introductory sections, a series of county-wide topic strategies, borough-level local transport strategies (including forward programmes), and statutory assessments. This modular form has allowed Surrey CC to introduce new modules and revise others over time.

---

<sup>169</sup> Available online at: <https://www.gov.uk/government/publications/cycling-and-walking-investment-strategy>.

- 6.66 For Guildford borough specifically, Surrey CC has not yet finalised its Local Transport Strategy during the period of LTP3 since 2011. A draft Local Transport Strategy was published in 2014 and it has indicated that a final version would be prepared following the adoption of the Guildford Borough Local Plan: Strategy and Sites. Surrey CC has now initiated the preparation of a Local Transport Strategy for Guildford borough, and this will, in due course, be subject to public consultation. (Guildford BC prepared a non-statutory transport strategy, most recently issued as the Guildford Borough Transport Strategy 2017 (Guildford BC, 2017), which was submitted as part of the evidence base for the examination of the Local Plan: Strategy and Sites).
- 6.67 A Guildford Local Cycling Plan (Surrey CC, undated circa 2015) has been prepared by Surrey CC, working with Guildford BC. This provides a blueprint for the Guildford borough cycle network. This plan was sanctioned on behalf of Surrey CC by the then Guildford Local Committee in December 2015, and has subsequently been subject to minor modifications and the addition of the Guildford-Godalming Greenway. This can be accessed at Surrey CC's 'Guildford cycling plan' webpage<sup>170</sup> which links to the online plan, to an online suggestions webpage and also provides a chronology of the plan's development and occasional 'news' relating to this.

#### **Local Plan: Strategy and Sites**

- 6.68 The Local Plan: Strategy and Sites' Policy ID3 Sustainable transport for new developments requires that new developments maximise the improvement of existing cycle routes to ensure their effectiveness and amenity. The key infrastructure on which the delivery of the Plan depends (policies ID1 and ID3) is included within an Infrastructure Schedule (Appendix 6). This Infrastructure Schedule includes schemes AM2 and AM3, with scheme AM2 providing a comprehensive Guildford borough cycle network, with the exception of AM3 which provides an off-site network in the vicinity of the former Wisley airfield site.
- 6.69 As explained in the Topic Paper: Transport (2017), it was intended that scheme AM2 'Comprehensive Guildford borough cycle network, excluding AM3' will be developed along the principles set out in Surrey CC's Guildford Local Cycling Plan (Surrey County Council, undated circa 2015).

#### **Evidence**

- 6.70 In 2018-19, a Route Assessments Feasibility Study was undertaken by consultants Transport Initiatives and Urban Movement for Guildford BC, as part of a wider project considering the potential for bike share in the town. The study took a fresh look at the cycle network in the town only (not the rest of the borough) based on an assessment of the bikeability skills required on different routes followed by the application of cycle network design principles. Thus the network has been considered from the perspective of the existing and potential quality and level of service for cycling. This is largely dependent on the degree of separation from traffic, or whether the route comprises of low traffic streets. This study has produced a somewhat different, and denser, network than that identified in the Surrey CC's Guildford Local Cycling Plan.

---

<sup>170</sup> Available at: <https://www.surreycc.gov.uk/roads-and-transport/sustainable-travel/cycling/plans/guildford>.

- 6.71 The draft Guildford cycle network identified in the 2018-19 study was well received by the Guildford Bike User Group (G-BUG) and there has been informal engagement with the Guildford Joint Committee with respect to this.
- 6.72 It is proposed that the outputs of the two evidence sources – Guildford BC’s Route Assessments Feasibility Study and Surrey CC’s Guildford Local Cycling Plan – could be combined, then referenced in a new policy with the resulting plan(s) for Guildford borough cycle network improvements added to the Policies Map for the Development Plan. This could help facilitate the realisation of a comprehensive Guildford borough cycle network.

## Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

### Preferred option for achieving a comprehensive Guildford borough cycle network

The aim of this policy option is to achieve a comprehensive Guildford borough cycle network.

The Policies Map will be updated using the cycle network plan outputs from the following sources:

- Guildford BC’s Route Assessment Feasibility Study, for the Guildford urban area. [Available as Appendix 1].
- Surrey CC’s Guildford Local Cycling Plan, particularly for the rest of the borough outside of the Guildford urban area. [Available as Appendix 2].

The Policies Map will therefore show specific routes along which the Council, working with Surrey County Council the Local Highway Authority and other partners, will undertake or promote measures to encourage cycling, including improvements to the safety and convenience of the routes, the designation of cycle tracks, the designation of cycle lanes, and the signposting and the provision of cycle parking facilities.

The policy will require that new developments have regard to the Guildford borough cycling plan, as represented on the updated Policies Map, in addressing the requirements of Policy ID3 Sustainable transport for new developments in the Local Plan: Strategy and Sites.

#### Potential advantages of this policy option:

- Combines the best of the two evidence sources.
- Provides for a denser and safer cycle network in the Guildford urban area.
- Provides a common, updated basis for the improvement of the Guildford borough cycle network.

**Potential disadvantages of this policy option:**

- The Guildford BC study identified a denser network in the Guildford urban area, which is likely to involve greater expenditure to realise.

**Alternative options for achieving a comprehensive Guildford borough cycle network**

**Alternative option:**

The Policies Map will be updated using only Surrey CC's Guildford Local Cycling Plan. [Available as Appendix 2].

**Potential advantages of this policy option:**

- Surrey CC's Guildford Local Cycling Plan has already been endorsed by the Guildford Local Committee.
- Likely to involve a lower expenditure to realise.

**Potential disadvantages of this policy option:**

- Does not provide the denser and safer network in the Guildford urban area.

**Justification for the choice of options and selection of preferred option**

**Reasons the options were selected**

The options are based on using the evidence sources.

**Reasons for selecting the preferred option in light of the other options**

The preferred option combines the best of the two evidence sources and provides for a denser and safer cycle network in the Guildford urban area.

**Question 37:**

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

Do you have any other comments or suggestions?

## Topic - Parking Standards

### Issues

- 6.73 Car ownership in the UK has risen steadily in the past 60 years, and despite some efforts in more recent decades to improve infrastructure and services to encourage people to make journeys on foot, by bicycle, on buses and trains, the need to provide appropriate levels of vehicle parking for new developments remains important.
- 6.74 This is because both under and over provision of vehicle parking can lead to a number of problems for new developments and adjacent neighbourhoods. Over-provision can, without appropriate design treatment, give rise to developments which are visually dominated by parked cars and, by contributing to lower densities, can increase the costs of new homes, whilst under-provision can cause congestion on local streets, including fly parking which can block footways, cycleways and roads, and overspill parking on adjacent local streets.
- 6.75 On a broader canvas, it should be recognised that the parking of vehicles uses extensive areas of land, including space on the public highway, and the extent of its provision and the conditions of its use can influence peoples' travel patterns and choice of mode.
- 6.76 Parking policy is part of a complex decision-set. The borough has developed during different periods of car ownership and has areas with very different characteristics. In addition, there are significant areas of off-street car parking which are provided to cater for the needs of Guildford town centre as a retail destination and business centre, including a park and ride system with four sites. There are also a number of public car parks across the borough, including at railway stations. In addition, the governance of parking policy is fragmented, and does not exist in a vacuum. Surrey County Council is responsible for local roads and transport policy, which includes responsibility for on-street parking, whilst the operation of rail and bus services is the responsibility of a number of operators of passenger transport services.
- 6.77 The Council's existing parking standards date from 2006. These were prepared in the light of the then national policy which sought reduced parking availability as a key tool in achieving a shift to more sustainable travel. The Council accordingly set maximum parking standards, which were intended to cap the amount of new car parking provided on-site.
- 6.78 The first NPPF, published in 2012, shifted the responsibility of determining vehicle parking standards towards local authorities. This required councils to take into account the individual characteristics of each development when setting standards. This includes the type, mix and use of the development, accessibility, availability and opportunities for public transport, local car ownership levels, and an overall need to reduce high-emission vehicles. A Ministerial statement in 2015 additionally required that Local Planning Authorities should only impose maximum parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network. This statement was incorporated into the second NPPF (2018) (and is retained in the 2019 version) together with a further potential rationale that maximum parking standards could be set in order to optimise the density of development in city and town centres and other locations that are well served by public transport.

- 6.79 In light of the NPPF (2012) and the Ministerial statement, the Council's 2006 parking standards have, in general, subsequently been used to indicate the expected amount of car parking that is to be provided by new developments, rather than used to calculate maximum quantum of parking. Nevertheless, neighbours' responses to planning applications often make cases to the effect that proposed on-site parking arrangements will be insufficient and that as a result there will be undesirable overspill of parking on adjacent local streets.
- 6.80 The potential rationales for setting maximum parking standards, as now allowed by national planning policy, are therefore the management of the local road network and/or to optimise the density of development in locations that are well served by public transport.
- 6.81 Surrey County Council, as the Local Highway Authority, has published non-statutory Vehicular and Cycle Parking Guidance (2018). It is recognised that the county 'exhibits a wide range of social and economic circumstances that necessitate a flexible approach to identifying appropriate levels of car parking provision'. With this said, the guidance proposes a series of maximum standards for the amount of car parking that should be provided by new developments for the various land uses (defined by Use Class), with, for residential developments, a tapering down of the maxima from suburban edge/village/rural locations, to suburban locations, to edge of centre locations, and with the lowest maxima in town centre locations. The maxima set out in the Surrey County Council guidance are justified on the basis of seeking 'to try and get the balance right, by providing an appropriate level and type of parking, protecting highway safety and promoting transport sustainability'. The guidance is 'commended' to Surrey's Local Planning Authorities for use in their Development Plans.
- 6.82 Conversely, the Neighbourhood Plans for Burpham and Effingham include policies with defining minimum parking standards in order to realise a greater number of car parking spaces in new developments than the established 2006 parking standards.
- 6.83 The Local Plan: Strategy and Sites (2019) signals that a Parking Supplementary Planning Document (SPD) will be brought forward by the Council. Policy ID3 requires that development proposals provide an appropriate level of off-street vehicle parking such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users. It also states that consideration will be given to setting maximum parking standards for Guildford town centre in the Parking SPD.
- 6.84 A new policy could be provided in the forthcoming Local Plan: Development Management Policies which would supplement the Policy ID3 requirements for parking. This would then further define the policy parameters, with the detailed guidance provided in a Parking SPD. This guidance could cover aspects such as the space requirements for garages and off-street parking, in order respectively to allow their use for vehicle parking and to prevent the overhanging of footways by parked vehicles. In advance of the forthcoming Parking SPD, the Draft Strategic Development Framework SPD (January 2020) includes electric vehicle charging standards for the strategic sites, excluding North Street, and the strategic location for growth, and also key guidance on the design of on-street car parking within new developments and the minimum dimensions of car parking spaces and garages.



- 6.85 The last Government consulted in 2019<sup>171</sup> on its proposals to alter building regulations for new residential buildings to include requirements for electric vehicle charge points and for non-residential buildings to include requirements for electric vehicle charge point infrastructure, and also to introduce a requirement through new separate legislation for existing non-residential buildings to have electric vehicle charge points. Standards for electric vehicle charging are proposed below.

## Policy ID11: Parking Standards

- 6.86 The Council's preferred approach is set out below.

### Preferred option for parking standards

The aim of this policy option is to:

- 1) Define maximum car parking standards for new residential developments in Guildford town centre.
- 2) Define one set of minimum car parking standards for new residential developments in the rest of Guildford borough (except Guildford town centre).
- 3) Define expected vehicle parking standards for new non-residential developments across the whole borough.
- 4) Define minimum cycle parking standards for both new residential and non-residential developments across the whole borough.
- 5) Define electric vehicle charging standards consistent with Surrey CC's Vehicular and Cycle Parking Guidance (2018) plus an additional requirement with respect to non-allocated car spaces in new residential developments.

Tables 3 - 7 below provide draft standards for items 1-5 above respectively.

#### Potential advantages of this policy option:

- Contribute to optimising the density of development in Guildford town centre given that it is well served by public transport.
- Reduced car trip making for occupants of and visitors to residential developments in Guildford town centre, all other factors being equal.
- Avoid potential problems of congested on-street parking in new development and overspill parking on adjacent local streets in the rest of the borough.

<sup>171</sup> Electric Vehicle Charging in Residential and Non-Residential Buildings (HM Government, July 2019).

- Consistent with Surrey CC's Vehicular and Cycle Parking Guidance (2018) with respect to standards for both the minimum provision of cycle parking and electric vehicle charging facilities.

**Potential disadvantages of this policy option:**

- Will not contribute to optimising the density of residential development in areas of the borough outside Guildford town centre.
- Increased car trip making for occupants of and visitors to residential developments outside of Guildford town centre, all other factors being equal.
- Inconsistent with Surrey CC's Vehicular and Cycle Parking Guidance (2018) with respect to vehicular parking standards for both new residential developments outside of the Guildford town centre and for all non-residential developments.

## Alternative options for parking standards

**Alternative option:**

- 1) Define maximum car parking standards for both new residential and, where appropriate, non-residential developments across the borough, with geographically tapered maxima for residential developments reflecting their location e.g. suburban edge/village/rural locations, suburban locations, edge of centre locations, and town centre locations.
- 2) It would be proposed to set standards for minimum provision of cycle parking and electric vehicle charging facilities as per the preferred policy option.

**Potential advantages of this policy option:**

- Contribute to optimising the density of development across the borough.
- Reduced car trip making associated with new developments across Guildford borough, all other factors being equal.
- Consistent with Surrey CC's Vehicular and Cycle Parking Guidance (2018).

**Potential disadvantages of this policy option:**

- Potential for problems of congested on-street parking in new development and overspill parking on adjacent local streets in the rest of the borough.

## Justification for the choice of options and selection of preferred option

### Reasons the options were selected

The preferred option is a pragmatic combination of the following sources:

- Consistent with the ambition of Policy S3 in the Local Plan: Strategy and Sites to make more efficient use of land in Guildford town centre.
- Consistent with a potentially broad public sentiment, as reflected in the Neighbourhood Plans for Burpham and Effingham, that minimum parking standards may be preferred as the default.

The alternative option was selected as it is:

- Consistent with the ambition of Policy S3 in the Local Plan: Strategy and Sites to make more efficient use of land in Guildford town centre.
- Considered that it could contribute to the more efficient use of land and the restraint of car trip making associated with new developments across the borough, both ambitions that previous consultation exercises have revealed as broadly-supported ambitions of respondents.
- Consistent with the guidance of Surrey County Council, the Local Transport Authority, on parking standards.

### Reasons for selecting the preferred option in light of the other options

The preferred option combines spatially-differentiated approaches to the provision of vehicle parking for new residential developments with expected vehicle parking standards for non-residential developments, and so the focus of restraint is on Guildford town centre and, to a lesser extent, on non-residential destinations across the borough. Additionally, in areas of the borough outside Guildford town centre, the preferred option seeks to manage and avoid potential problems of congested on-street parking in new development and overspill parking on adjacent local streets in the rest of the borough. Standards for both the minimum provision of cycle parking and electric vehicle charging facilities are the same for both options considered.

### Question 38:

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

Do you have any other comments or suggestions?

## Parking Standards Tables: Preferred Option

*Table 3: Residential development within Guildford town centre – Provision of car parking spaces*

<b>Size of residential dwelling</b>	<b>Studio Apartment</b>	<b>1 bedroom</b>	<b>2 bedroom</b>	<b>3 or more bedrooms</b>
<u>Maximum</u> number of car parking spaces provided	1 space	1 space	2 spaces	2 spaces
Unallocated visitor car parking provided (applies to developments of 5 or more dwellings)	20% of number of allocated spaces	20% of number of allocated spaces	20% of number of allocated spaces	20% of number of allocated spaces

*Table 4: Residential development in the rest of Guildford borough (excluding Guildford town centre) – Provision of car parking spaces*

<b>Size of residential dwelling</b>	<b>Studio Apartment</b>	<b>1 bedroom</b>	<b>2 bedroom</b>	<b>3 or more bedrooms</b>
<u>Minimum</u> car parking spaces provided	1 spaces	1 spaces	2 spaces	2 spaces
Unallocated visitor car parking provided (applies to developments of 5 or more dwellings)	20% of number of allocated spaces	20% of number of allocated spaces	20% of number of allocated spaces	20% of number of allocated spaces

Table 5: Non-residential development across the whole of Guildford borough – Provision of vehicle parking spaces

Use Class	Expected vehicle parking spaces provided (if expressed as a provision for a given floor area then this is per m <sup>2</sup> GFA)
<b>A1 Retail</b>	
<i>Food or non-food retail e.g.: small parades of shops serving the local community (up to 500m<sup>2</sup>)*</i>	1 car space per 30m <sup>2</sup>
<i>Food retail (500 m<sup>2</sup> to 1000m<sup>2</sup>)*</i>	1 space per 25m <sup>2</sup>
<i>Food retail (above 1000m<sup>2</sup>)*</i>	1 car space per 14m <sup>2</sup>
<i>Non-food retail (500m<sup>2</sup> or more)*</i>	1 space per 25m <sup>2</sup>
<i>*Suggested reductions as stated or greater, to be applied based on location. Note: Retail parking to be provided as shared use where appropriate.</i>	Town Centre 75% Edge of Centre 50% Suburban 25% Suburban/Edge/Village/Rural 0%
<b>A3 Food and drink</b>	
Restaurants, snack bars and cafés. For sale & consumption on the premises (if located beyond Town Centre locations).	1 car space per 6m <sup>2</sup> No parking in town centres
<b>A4 Drinking establishments</b>	
Public houses, wine bars or other drinking establishments but not nightclubs (if located beyond Town Centre locations).	Individual assessment/justification No parking in town centres
<b>A5 Hot Food Takeaways</b>	
For sale & consumption of hot food off the premises (if located beyond Town Centre locations).	1 car space per 6m <sup>2</sup> No parking in town centres
<b>B1 Business</b>	
Offices, research & development, light industry appropriate in a residential area – threshold of 2500m <sup>2</sup>	A maximum range of 1 car space per 30m <sup>2</sup> to 1 car space per 100m <sup>2</sup> depending on location
<b>B2 General Industrial</b>	
General industrial use	1 car space per 30m <sup>2</sup>

<b>B8 Storage/distribution (including open air storage)</b>	
Warehouse – storage	1 car space per 100m <sup>2</sup> 1 lorry space per 200m <sup>2</sup>
Warehouse – distribution	1 car space per 70m <sup>2</sup> 1 lorry space per 200m <sup>2</sup>
Cash and carry	1 car space per 70m <sup>2</sup> 1 lorry space per 200m <sup>2</sup>
<b>C1 Hotels</b>	
Hotels, boarding and guest houses where no significant care is provided	1.5 car spaces per bedroom plus 1 coach space per 100 bedrooms OR Individual assessment/justification
<b>C2 Residential Institutions</b>	
Care home Nursing home	1 car space per 2 residents OR Individual assessment/justification
Hospitals	1 car space per 4 staff plus 1 car space per 3 daily visitors OR Individual assessment/justification
Residential colleges	Individual assessment/justification
Training centres	1 car space per 2 staff OR Individual assessment/justification
<b>C3 Dwelling houses (family houses, up to 6 residents living as a single household, including households where care is provided)</b>	
See Tables 1 and 2.	
Elderly (sheltered)	1 car space per 1 or 2 bed self-contained unit OR 0.5 per communal unit OR Individual Assessment
<b>D1 Non-residential institutions</b>	
Day Nurseries/Crèche	0.75 car spaces per member of staff plus 0.2 spaces per child
Doctor's practices	1 car space per consulting room remaining spaces on individual assessment
Dentist's practices	1 car space per consulting room remaining spaces on individual assessment
Veterinary practices	1 car space per consulting room remaining spaces on individual assessment
Libraries, museums and art galleries	1 car space per 30m <sup>2</sup> OR Individual assessment/justification

Public halls licensed for entertainment, unlicensed youth and community centres and Scout huts etc	1 car space per 3 persons OR per 3 seats OR per 20 m <sup>2</sup> OR Individual assessment/justification
Places of worship	1 car space per 10 seats OR Individual assessment/justification
Schools/colleges/children's centres	Individual assessment/justification See notes on School Parking on page 7 of Surrey County Council's Vehicular and Cycle Parking Guidance (2018).
<b>D2 Assembly and leisure</b>	
Theatres, cinemas, bingo clubs, dance halls and clubs	1 car space per 5 licensed persons OR Individual assessment/justification
Conference Centres	1 car space per 5 seats OR Individual assessment/justification
Exhibition Halls	1 car space per 6 m <sup>2</sup> OR Individual assessment/justification
Stadia	1 car space per 15 seats OR individual assessment/justification
Health clubs/leisure centres	Individual assessment/justification
Tennis and Badminton Clubs	4 car spaces per court OR Individual assessment/justification
Squash Clubs	2 car spaces per court OR Individual assessment/justification
Marinas and water sports	3 car spaces per hectare of water OR Individual assessment/justification
Field Sports Clubs	1 car space per 2 playing participants OR Individual assessment/justification
Golf Clubs and driving ranges	1 car space per 0.3 holes OR per driving bay OR Individual assessment/justification
Equestrian centres	1 car space per stable OR Individual assessment/justification
<b>Other uses</b>	
Pick your own fruit farms	9 car spaces per hectare of farmland OR Individual assessment/justification
Vehicle repair, garage and spares stores	1 car space per 20m <sup>2</sup> OR Individual assessment/justification
Car sales establishments	1 car space per 50m <sup>2</sup> car display area OR Individual assessment/justification
Exhaust and tyre centres	1 car space per 0.3-0.5 bays OR Individual assessment/justification
<b>Sui Generis and all other uses not mentioned above</b>	
Individual assessment/justification	

Table 6: Residential and non-residential development across the whole of Guildford borough  
– Provision of cycle parking spaces

Use Class	<u>Minimum</u> cycle parking spaces provided
<b>A1 Retail</b>	
<i>Food retail</i>	1 space per 350m <sup>2</sup> (out of centre) 1 space per 125m <sup>2</sup> (town/local centre)
<i>Non-food retail</i>	1 space per 1500m <sup>2</sup> (out of centre) with minimum 4 spaces 1 space per 300m <sup>2</sup> (town/local centre)
<i>Garden Centre (can also be classed under sui generis)</i>	1 space per 300m <sup>2</sup> (min 2 spaces)
<i>All other retail uses</i>	Individual assessment
<b>A3 Food and drink</b>	
Restaurants, snack bars and cafés. For sale & consumption on the premises (if located beyond Town Centre locations).	1 space per 20 seats (min 2 spaces), town centre parking not necessarily required
<b>A4 Drinking establishments</b>	
Public houses, wine bars or other drinking establishments but not nightclubs (if located beyond Town Centre locations).	1 space per 100m <sup>2</sup> (min 2 spaces), town centre parking not necessarily required
<b>A5 Hot Food Takeaways</b>	
For sale & consumption of hot food off the premises (if located beyond Town Centre locations).	1 space per 50m <sup>2</sup> (min 2 spaces), town centre parking not necessarily required
<b>B1 Business</b>	
Offices	1 space per 125m <sup>2</sup> (min 2 spaces)
Research & development / light industry	1 space per 125m <sup>2</sup> (min 2 spaces)
<b>B2 General Industrial</b>	1 space per 500m <sup>2</sup> (min 2 spaces)
<b>B8 Storage/distribution (including open air storage)</b>	1 space per 500m <sup>2</sup> (min 2 spaces)
<b>C1 Hotels/Guest houses</b>	Individual assessment
<b>C2 Residential Institutions</b>	
Care home/Nursing home	Individual assessment
Hospitals	Individual assessment
Residential colleges	1 space per 2 students 1 space per 2staff
Training centres	Individual assessment



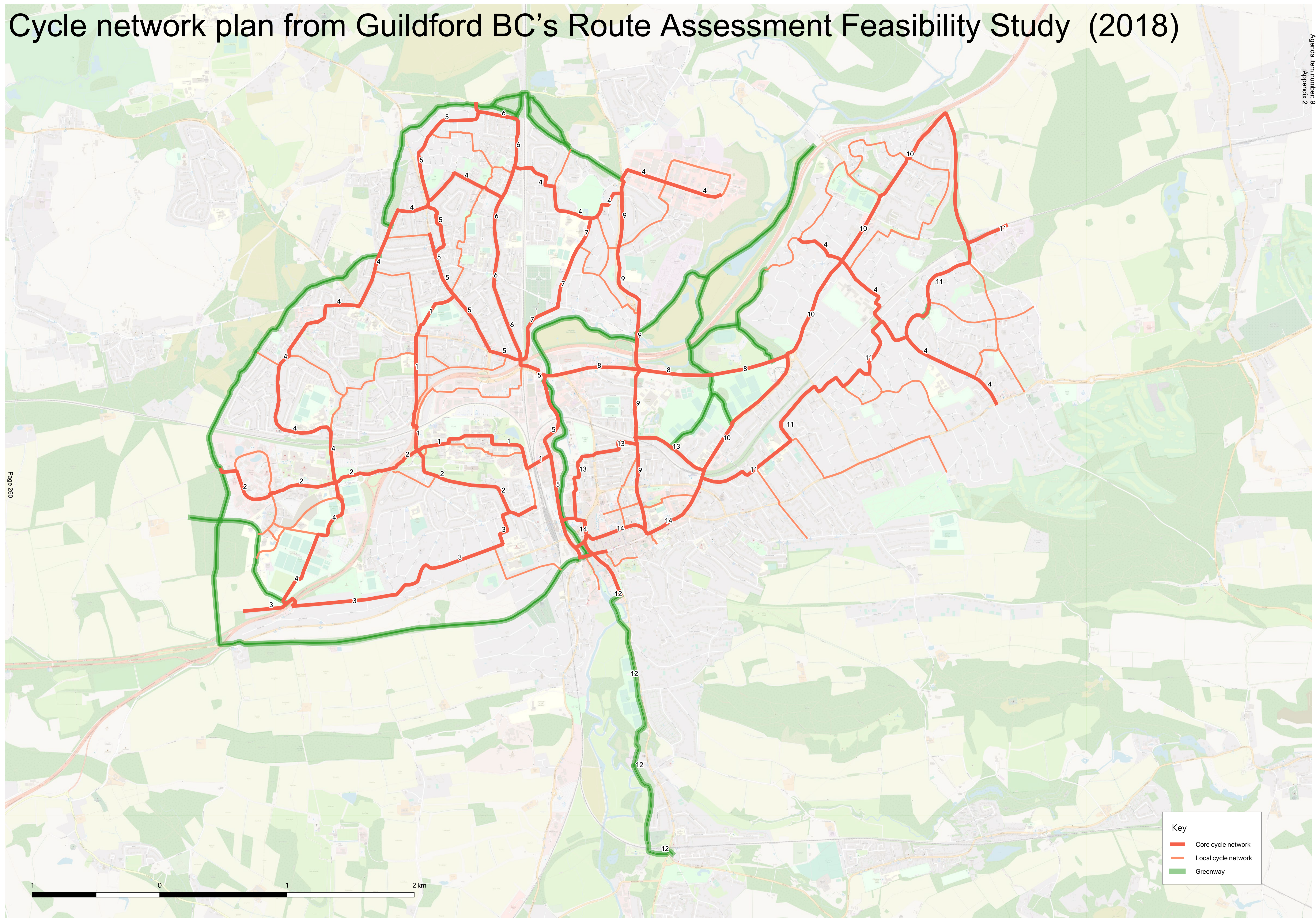
<b>C3 Dwelling houses (family houses, up to 6 residents living as a single household, including households where care is provided)</b>	
Flats / houses with garages and/or gardens: 1 and 2 bedroom unit 3 or more bedroom unit	1 space 2 spaces
Flats / houses without garages or gardens: 1 and 2 bedroom unit 3 or more bedroom unit	1 space 2 spaces
<b>D1 Non-residential institutions</b>	
Day Nurseries/Crèche	1 space per 5 staff plus minimum 2 spaces
Doctor's practices	1 space per 2 consulting rooms, minimum 2 spaces
Dentist's practices	1 space per 2 consulting rooms, minimum 2 spaces
Veterinary practices	1 space per 2 consulting rooms, minimum 2 spaces
Libraries, museums and art galleries	Individual assessment
Public halls licensed for entertainment, unlicensed youth and community centres and Scout huts etc	Individual assessment
Places of worship	Individual assessment
Schools/colleges/children's centres	School Travel Plan required, to incorporate a site specific cycle strategy. See notes on School Parking on page 7 of Surrey County Council's Vehicular and Cycle Parking Guidance (2018).
<b>D2 Assembly and leisure</b>	
<b>Sui Generis and all other uses not mentioned above</b>	Individual assessment

Table 7: Residential and non-residential development across the whole of Guildford borough  
– Provision of electric vehicle charging

<b>Residential Development</b>	<b>EV Charging Requirement</b>	<b>Charge Point Specification</b>	<b>Power Requirement</b>
Houses and flats/apartments – allocated parking	1 fast charge socket per house/flat/apartment with one or more allocated car parking space	7kw Mode 3 with Type 2 Connector	230v AC 32 Amp Single Phase dedicated supply
Houses and flats/apartments – unallocated parking	20% of unallocated car parking spaces to be fitted with 1 fast charge socket		
C2 Care /Nursing Home C3 Elderly (Sheltered)	A further 20% of available spaces to be provided with power supply to provide additional fast charge socket	Feeder pillar or equivalent permitting future connection.	230v AC 32 Amp Single Phase dedicated supply
<b>Commercial Development</b> (Offices / Employment / Retail / Leisure Uses)	<b>EV Charging Requirement</b>	<b>Charge Point Specification</b>	<b>Power Requirement</b>
B1 Offices, light Industry >500m <sup>2</sup> B2 General Industrial >500m <sup>2</sup> B8 Storage & Distribution >1000m <sup>2</sup> D1 Doctors/Dentists practices D1 Schools/Colleges A1 Retail >500m <sup>2</sup> C1 Hotels D2 Sports Clubs, Health Clubs, Leisure Centres, Theatres, Cinemas, Conference Centres, >500m <sup>2</sup>	10% of available car parking spaces to be fitted with a fast charge socket	7kw Mode 3 with Type 2 Connector	230v AC 32 Amp Single Phase dedicated supply
	A further 10% of available car parking spaces to be provided with power supply to provide additional fast charge socket	Feeder pillar or equivalent permitting future connection.	230v AC 32 Amp Single Phase dedicated supply
<b>Sui Generis Uses</b>	<b>EV Charging Requirement</b>	<b>Charge Point Specification</b>	<b>Power Requirement</b>
(Including all other uses not mentioned above).	Individual assessment / justification	Individual assessment / justification	To be determined by charge point specification

## **Appendix 1: Cycle network plan from Guildford BC's Route Assessment Feasibility Study (2018)**

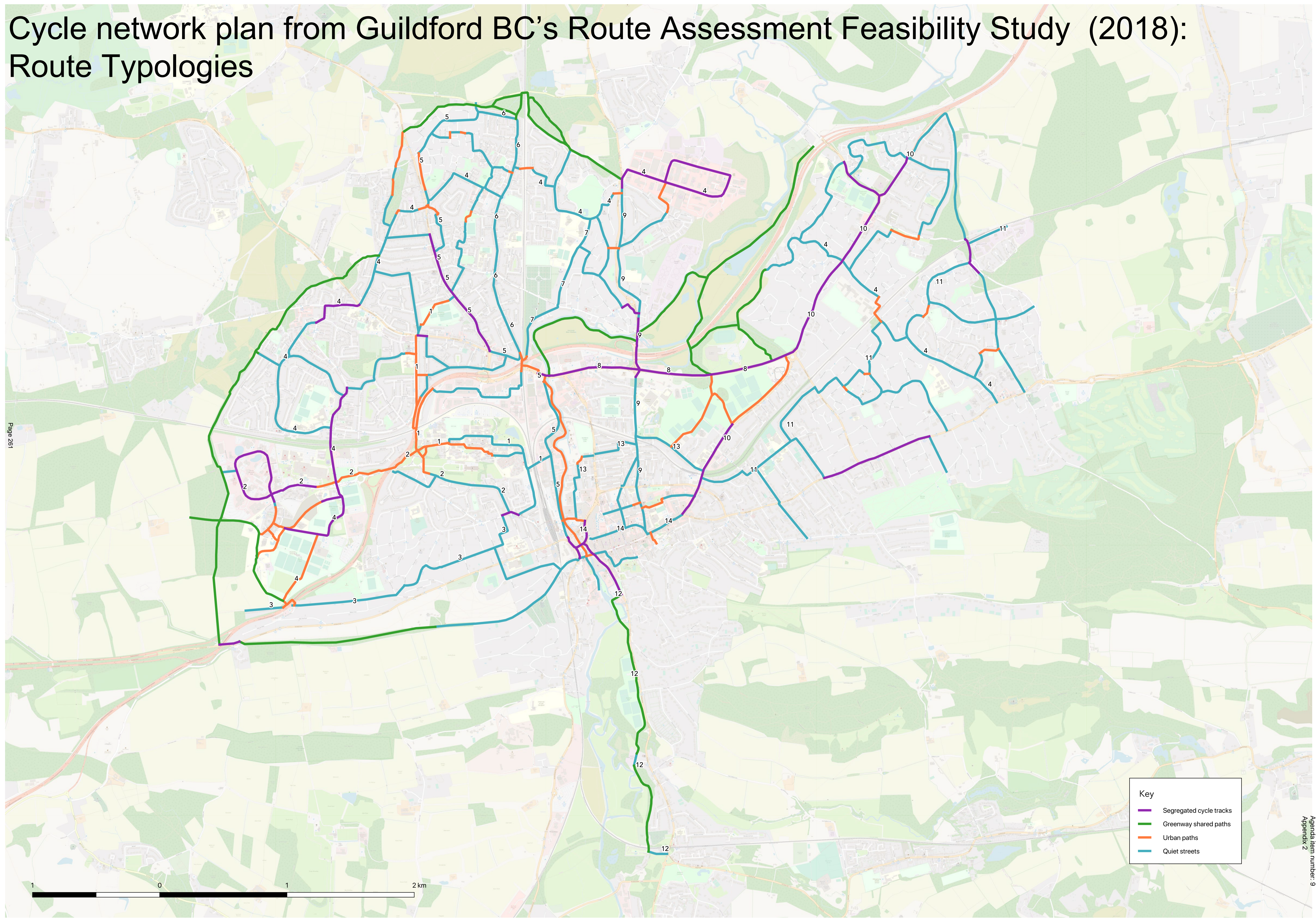
# Cycle network plan from Guildford BC's Route Assessment Feasibility Study (2018)



**Key**

- Core cycle network
- Local cycle network
- Greenway

# Cycle network plan from Guildford BC's Route Assessment Feasibility Study (2018): Route Typologies



Page 261

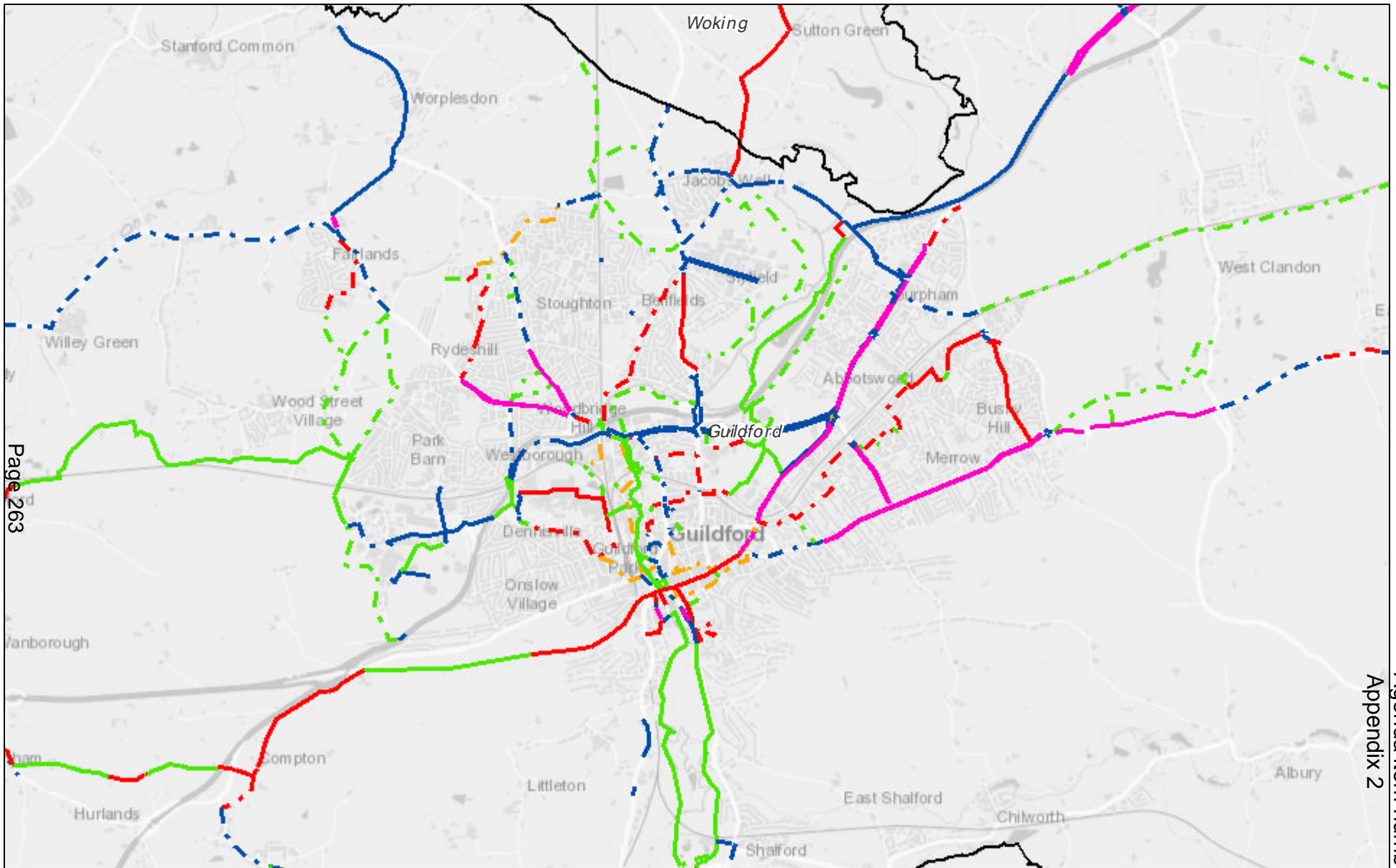
**Key**

- Segregated cycle tracks
- Greenway shared paths
- Urban paths
- Quiet streets



## **Appendix 2: Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated)**

# Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated) [Accessed 6/12/2017]

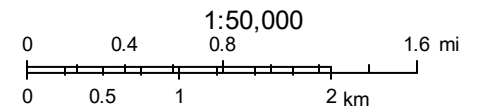


Page 263

Agenda item number: 9  
Appendix 2

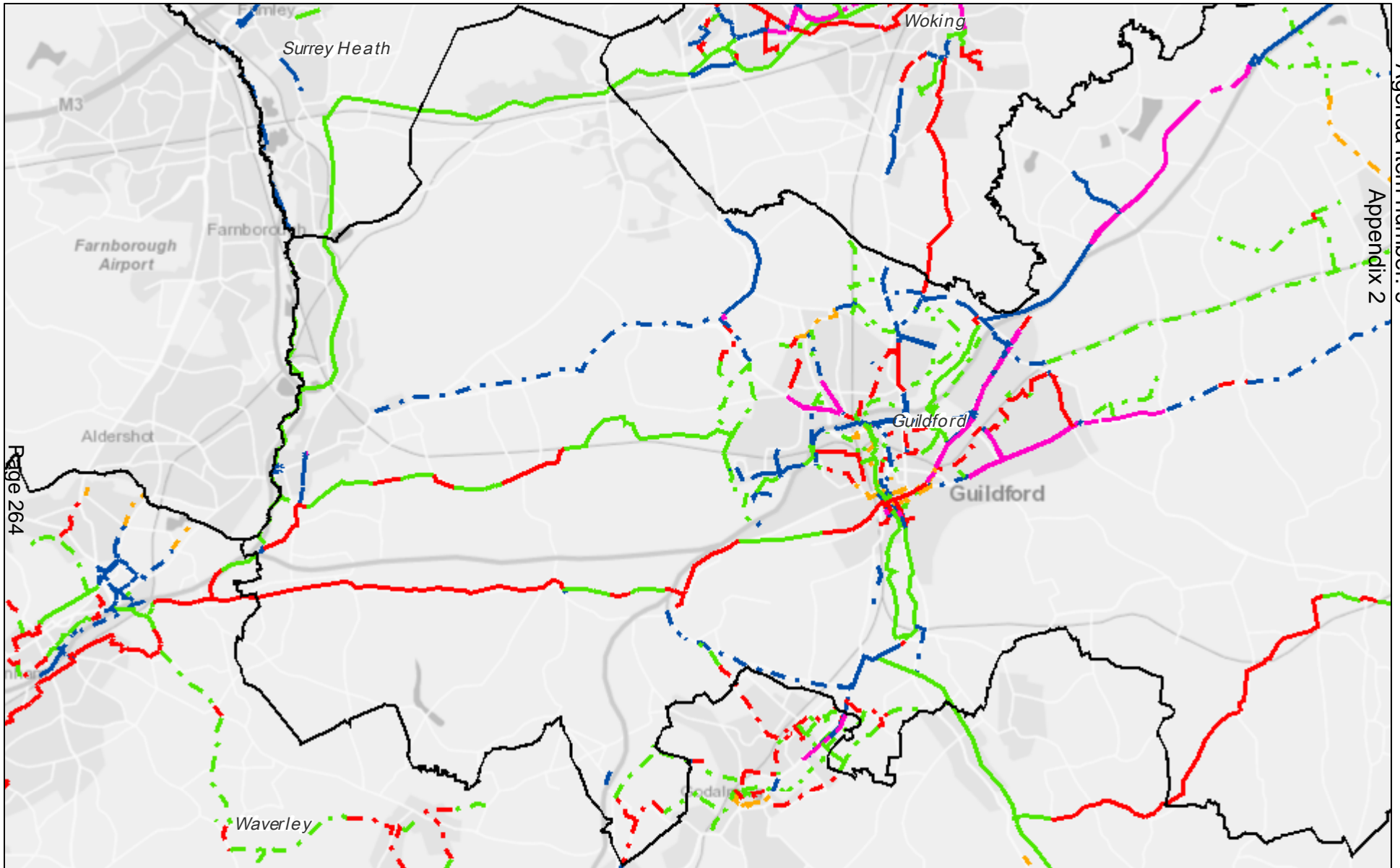
December 6, 2017

- |                                 |                         |                                   |
|---------------------------------|-------------------------|-----------------------------------|
| District and Borough Boundaries | Signed advisory route   | Greenway                          |
| <b>Existing Routes</b>          | Cycle lane              | Signed advisory route             |
| Cycle track                     | <b>Suggested Routes</b> | Cycle-friendly traffic management |
| Greenway                        | Cycle track             |                                   |



Contains OS data © Crown Copyright and database right 2017

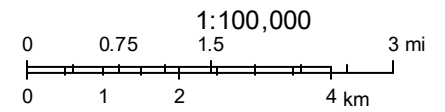
# Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated) [Accessed 6/12/2017]



Agenda item number: 9  
Appendix 2

December 6, 2017

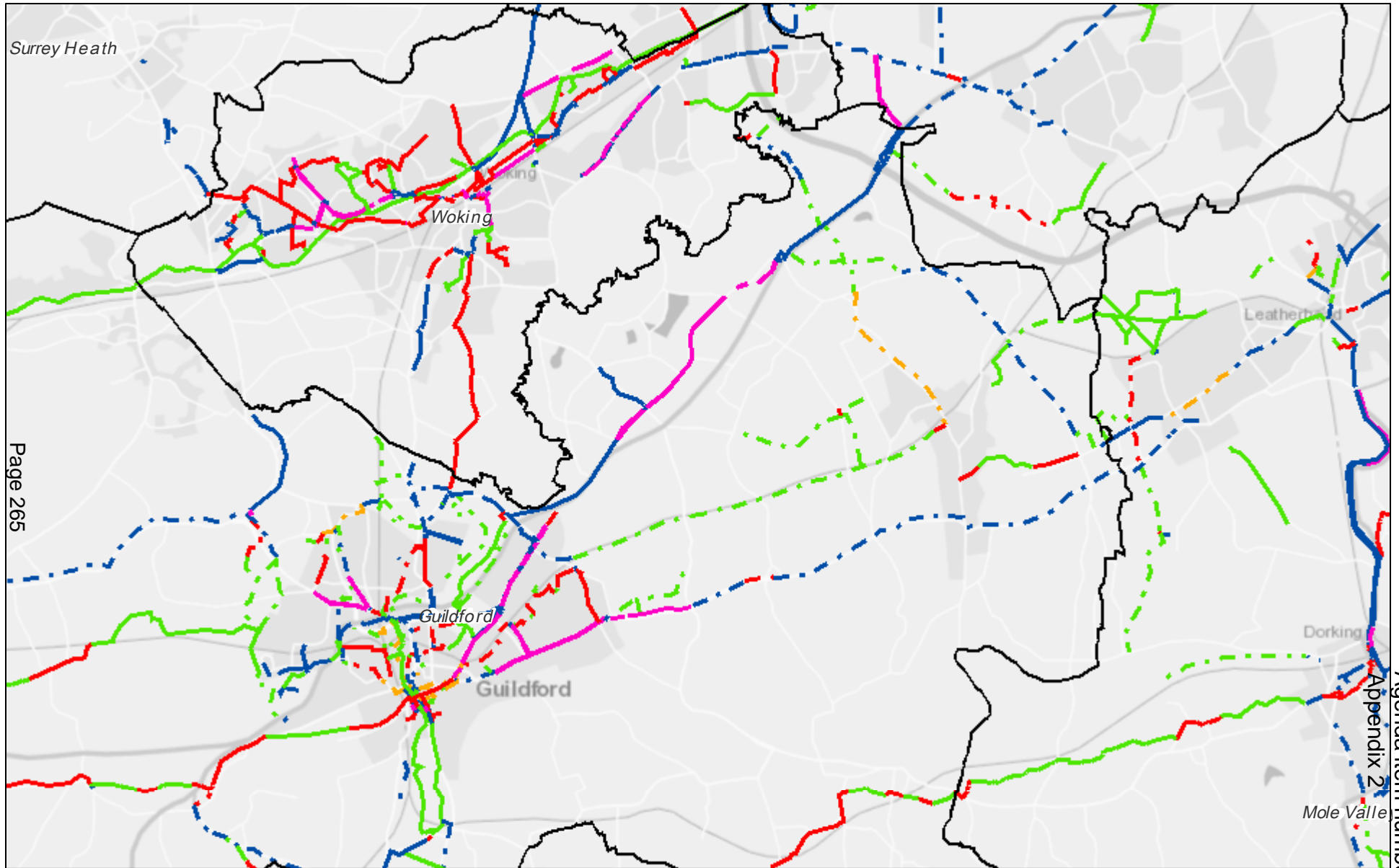
- |   |  |   |
|---|--|---|
| District and Borough Boundaries                 | <span style="color: red;">—</span> Signed advisory route | <span style="color: green;">- - -</span> Greenway                           |
| <b>Existing Routes</b>                          | <span style="color: magenta;">—</span> Cycle lane        | <span style="color: red;">- - -</span> Signed advisory route                |
| <span style="color: blue;">—</span> Cycle track | <b>Suggested Routes</b>                                  | <span style="color: orange;">- - -</span> Cycle-friendly traffic management |
| <span style="color: green;">—</span> Greenway   | <span style="color: blue;">- - -</span> Cycle track      |   |



Contains OS data © Crown Copyright and database right 2017

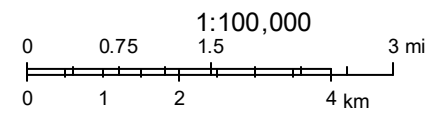


# Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated) [Accessed 6/12/2017]



December 6, 2017

- |                                 |                         |                                   |
|---------------------------------|-------------------------|-----------------------------------|
| District and Borough Boundaries | Signed advisory route   | Greenway                          |
| <b>Existing Routes</b>          | Cycle lane              | Signed advisory route             |
| Cycle track                     | <b>Suggested Routes</b> | Cycle-friendly traffic management |
| Greenway                        | Cycle track             |                                   |

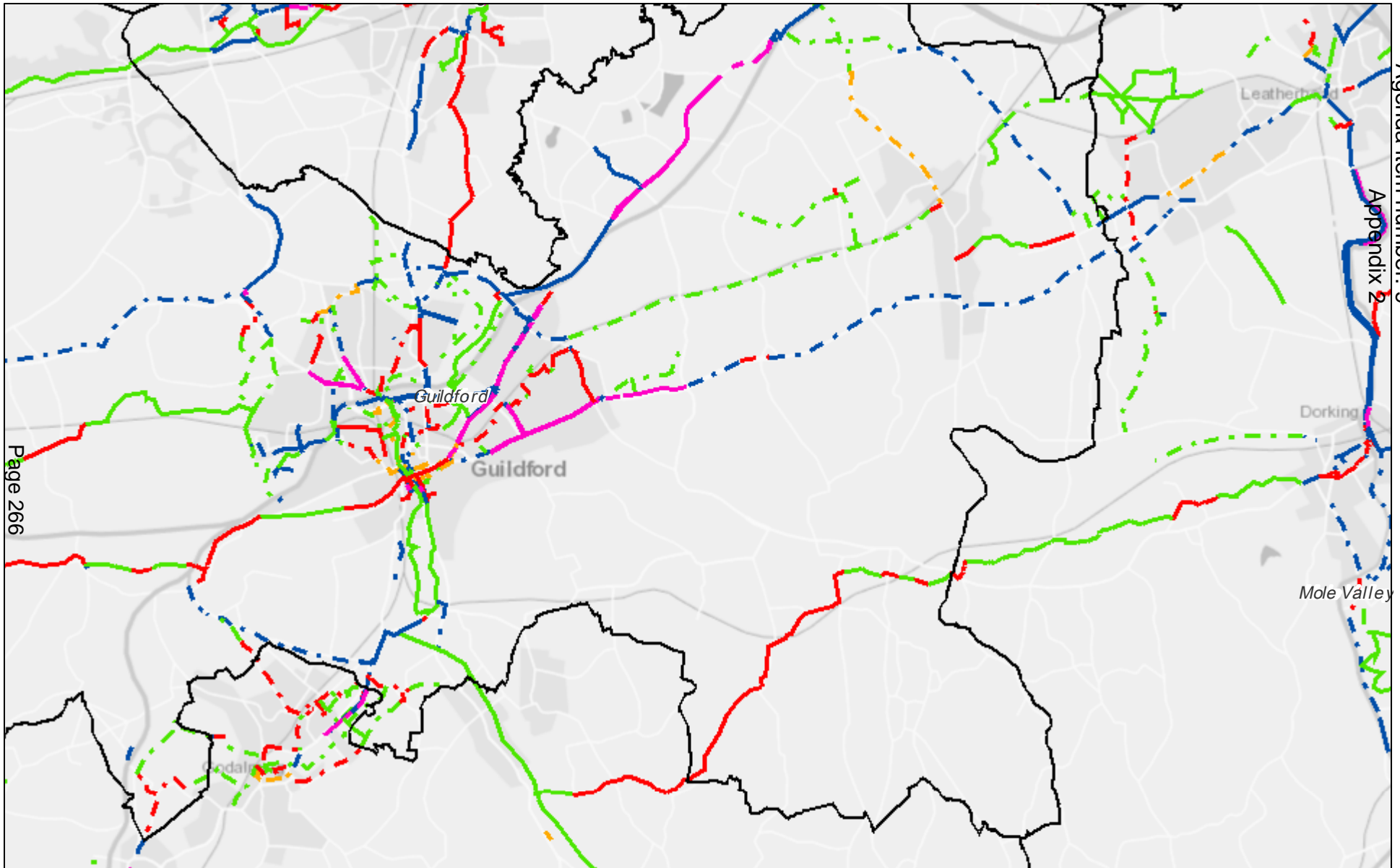


Contains OS data © Crown Copyright and database right 2017

Agenda item number: 9

Page 265

# Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated) [Accessed 6/12/2017]

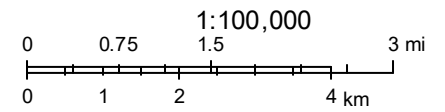


Agenda item number: 9  
Appendix 2

Page 266

December 6, 2017

- |                                 |                         |                                   |
|---------------------------------|-------------------------|-----------------------------------|
| District and Borough Boundaries | Signed advisory route   | Greenway                          |
| <b>Existing Routes</b>          | Cycle lane              | Signed advisory route             |
| Cycle track                     | <b>Suggested Routes</b> | Cycle-friendly traffic management |
| Greenway                        | Cycle track             |                                   |



Contains OS data © Crown Copyright and database right 2017

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

<b>Service</b>	Planning Services	<b>Officer responsible for the screening/scoping</b>	Sarah-Jane Grant		
<b>Name of the activity to be assessed</b>	Draft Local Plan: development management policies (Regulation 18 consultation stage)	<b>Date of Assessment</b>	14/02/2020 (Draft)	<b>Is this a proposed new or existing activity?</b> The draft Local Plan development management policies (DM DPD) is intended to consist of new policies. The current stage is identifying issues, options and preferred options for policies.	
<b>1. Briefly describe the aims, objectives and purpose of the activity?</b>	<p>The draft DM DPD will provide detailed development management policies that will be used when the Council determines planning applications. When adopted, it will form Part 2 of the Guildford Local Plan, alongside the 'Strategy and Sites' document (Part 1) adopted in April 2019.</p> <p>The draft DM DPD sets out various issues, options and our preferred options for potential development management policies that will help manage development across Guildford borough.</p>				
<b>2. Are there any associated or specific objectives of the activity? Please explain.</b>	<p>A key objective / aim of the Local Plan process is to gather information on the views of the local community and other stakeholders about the key issues in the borough and the potential policy options, including the Council's preferred option, for addressing the identified planning issues.</p> <p>The plan's objectives are carried forward from the 'Local Plan: strategy and sites' (LPSS) strategic objectives. These include a range of social objectives, such as: to deliver sufficient sustainable development that meets all identified needs; to improve opportunities for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities; and to ensure that all development is of high quality design and enables people to live safe healthy and active lifestyles, along with various environmental, economic and infrastructure objectives.</p>				
<b>3. Who is intended to benefit from this activity</b>	The Local Plan will benefit all those who live, work, run businesses, play, visit or travel in the				

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

<p><b>and in what way?</b></p>	<p>borough, by providing policies that promote more sustainable and inclusive development with higher design standards. The plan will help to increase certainty for residents, businesses, and others about how planning decisions are made and what they are based on.</p>
<p><b>4. What outcomes are wanted from this activity?</b></p>	<p>The Council is seeking to progress its preferred options for development management policies. The preferred options reflect the Council's preference for the direction that these policies will take. These preferred options are being engaged upon and the Council is seeking inputs from a broad cross-section of the borough's communities as well as other stakeholders.</p> <p>Ultimately, the Council will seek development which aligns with the development management policies that are eventually adopted. It is anticipated that this will have a range of positive social, environmental and economic outcomes which will achieve the Local Plan objectives. Sustainability Appraisal (SA) will be undertaken alongside plan preparation. This will appraise emerging policies against a number of social, economic and environmental objectives. This includes a number of social objectives:</p> <ul style="list-style-type: none"> <li>• To meet housing requirements of the whole community and provide housing of a suitable mix and type</li> <li>• To facilitate improved health and well-being of the population, enabling people to stay independent and reducing inequalities in health</li> <li>• To create and maintain safer and more secure communities and improve the quality of where people live and work</li> <li>• To reduce poverty and social exclusion for all sectors of the community</li> <li>• To create and sustain vibrant communities</li> <li>• To improve levels of education and skills in the population overall</li> </ul> <p>The SA process will enable a greater understanding of whether the emerging policies perform positively against these objectives and highlight opportunities to improve or enhance this through amendments to the policy.</p>

Agenda item number: 9  
Appendix 3

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

<b>5. What factors/forces could contribute/detract from the outcomes?</b>	The engagement process provides an opportunity to contribute to the achieving the outcomes and Local Plan objectives.		
<b>6. Who are the main stakeholders in relation to the activity?</b>	Main stakeholders include: - <ul style="list-style-type: none"> <li>• Statutory organisations</li> <li>• Local residents and amenity groups</li> <li>• Neighbourhood, local and national pressure groups</li> <li>• Parish councils</li> <li>• Developers, landowners.</li> </ul>	<b>7. Who implements the activity, and who is responsible for the activity?</b>	The Council (in particular the development management service) will be the primary implementers of the policies, using them to assess planning applications.
<b>8. Are there concerns that the activity <u>could</u> have a differential impact on racial groups?</b>	Y	<input checked="" type="checkbox"/> N	None.
<b>What existing evidence, local or national, actual or presumed, do you have to support your response?</b>	At this stage, the Council considers that the preferred options for draft DM DPD policies as a whole are not likely to have a differential impact in relation to racial groups.  Travellers are a specific race protected under the Race Relations Act. The Council has produced a Traveller Accommodation Assessment (2017) and the LPSS prioritised addressing the accommodation needs of Travellers in its policies (see for example Policy H1(7), H3 and relevant site allocation Policies). The Council's Annual Monitoring Report (AMR) provides an indication of performance in meeting needs related to the Local Plan.  The Council has been mindful of opportunities to further advance greater equality in the drafting of preferred options for policies across the range of topics in the draft DM DPD. The Council will consider feedback from public consultation including any opportunities that may be identified to address possible differential impacts on racial groups in the borough linked to the policy topic areas being considered. This will feed into the refinement of policies prior to regulation 19 consultation on draft DM policies.		
<b>9. Are there concerns that the activity <u>could</u> have a differential impact on grounds of gender?</b>	Y	<input checked="" type="checkbox"/> N	None.

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

<p><b>What existing evidence, local or national, actual or presumed, do you have to support your response?</b></p>			<p>At this stage, the Council considers that the preferred options for draft DM DPD policies as a whole are not likely to have a differential impact in relation to gender.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of preferred options for policies across the range of topics in the draft DM DPD. The Sustainability Appraisal Scoping Report January 2020 identified that deficiencies in open space provision may have a disproportionate effect on certain groups, i.e. women who are lone parents and families with children under 5. The Council through its DM policies aims to promote access to safe, inclusive and accessible, open spaces, in particular for women and children, older persons and persons with disabilities (specifically through SA objective 3. To create and maintain safer and more secure communities and improve the quality of where people live and work).</p> <p>The Council will consider feedback from public consultation including any opportunities that may be identified to address possible differential impacts in relation to gender in the borough linked to the policy topic areas being considered. This will feed into the refinement of policies prior to regulation 19 consultation on draft DM policies.</p>
<p><b>10. Are there concerns that the activity <u>could</u> have a differential impact on those who have a disability?</b></p>	Y	<input checked="" type="checkbox"/> N	<p>None.</p>
<p><b>What existing evidence, local or national, actual or presumed, do you have to support your response?</b></p>			<p>At this stage, the Council considers that the preferred options for draft DM DPD policies as a whole are not likely to have a differential impact in relation to those who have a disability.</p> <p>The NPPF includes reference to addressing the housing needs for different groups in the community. This includes people with disabilities (see paragraph 61). The Local Plan: strategy and sites 2019 (LPSS) has responded to this through its policies including in relation to accessible homes (Policy H1). The draft DM DPD seeks to develop policies in line with these aims as outlined within the LPSS.</p> <p>The NPPF (para 110) indicates that applications for development should address the needs of</p>

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

	<p>people with disabilities and reduced mobility in relation to all modes of transport. The LPSS policies regarding development seek to locate growth in areas that are accessible by public transport, or can be made so, and sustainable transport policies require that new development maximises opportunities for people with disabilities to access all modes of transport. Policies also state that all new development will be designed to meet the needs of all users, including the setting of the building in the wider environment, the location of the building, the gradient of the plot, transport infrastructure and the public realm.</p> <p>Sites and improvements to public spaces will need to be designed to comply with the Disability Discrimination Act 1995.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of preferred options for policies across the range of topics in the draft DM DPD (particularly those relating to design and infrastructure). For example, new open spaces are expected to be safe and secure for all members of the community and new community facilities must be appropriate in design terms (see also LPSS policy D1). The SA Scoping report has identified that an estimated number of autistic adults and adults with learning disability is expected to increase steadily over time in line with population growth. Population growth is expected to be greatest among the over 65 age group and this, coupled with increases in life expectancy, will result in more autistic adults and adults with learning disabilities requiring additional care and support associated with older age (specifically through SA objective 2. To facilitate improved health and well-being of the population, enabling people to stay independent and reducing inequalities in health).</p> <p>The Council will consider feedback from public consultation, including any opportunities that may be identified to address possible differential impacts in relation to those who have a disability in the borough linked to the policy topic areas being considered. This will feed into the refinement of policies prior to regulation 19 consultation on draft DM policies.</p>		
<p><b>11. Are there concerns that the activity <u>could</u> have a differential impact on grounds of sexual orientation?</b></p>	<p>Y</p>	<p><input checked="" type="checkbox"/> N</p>	<p>None.</p>

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

Agenda item number: 9  
Appendix 3

<p><b>What existing evidence, local or national, actual or presumed, do you have to support your response?</b></p>	<p>At this stage, the Council considers that the preferred options for draft DM DPD policies as a whole are not likely to have a differential impact on the grounds of sexual orientation.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of preferred options for policies across the range of topics in the draft DM DPD. The Council will consider feedback from public consultation including any opportunities that may be identified to address possible differential impacts on the grounds of sexual orientation in the borough linked to the policy topic areas being considered. This will feed into the refinement of policies prior to regulation 19 consultation on draft DM policies.</p>		
<p><b>12. Are there concerns that the activity <u>could</u> have a differential impact on grounds of age?</b></p>	<p>Y</p>	<p><input checked="" type="checkbox"/> N</p>	<p>None.</p>
<p><b>What existing evidence, local or national, actual or presumed, do you have to support your response?</b></p>	<p>At this stage, the Council considers that the preferred options for draft DM DPD policies as a whole are not likely to have a differential impact on the grounds of age.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of preferred options for policies across the range of topics in the draft DM DPD. An example of this is policy H5 which sets out criteria for residential annexes, which will enable families of different generations to live together and help address the cost of care in later life. The Council will consider feedback from public consultation including any opportunities that may be identified to address possible differential impacts on the grounds of age in the borough linked to the policy topic areas being considered. This will feed into the refinement of policies prior to regulation 19 consultation on draft DM policies.</p>		
<p><b>13. Are there concerns that the activity <u>could</u> have a differential impact on grounds of religious belief?</b></p>	<p>Y</p>	<p><input checked="" type="checkbox"/> N</p>	<p>None.</p>



Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

<p><b>What existing evidence, local or national, actual or presumed, do you have to support your response?</b></p>	<p>At this stage, the Council considers that the preferred options for draft DM DPD policies as a whole are not likely to have a differential impact on the grounds of religious belief.</p> <p>The preferred option in relation to a draft policy for Community Facilities (which includes places of worship) reflects provisions supporting their development and retention. This may have a positive impact in relation to religious groups who use these facilities.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of preferred options for policies across the range of topics in the draft DM DPD. The Council will consider feedback from public consultation including any opportunities that may be identified to address possible differential impacts on the religious belief in the borough linked to the policy topic areas being considered. This will feed into the refinement of policies prior to regulation 19 consultation on draft DM policies.</p>		
<p><b>14. Are there concerns that the activity <u>could</u> have a differential impact on those who have caring responsibilities?</b></p>	<p>Y</p>	<p><input checked="" type="checkbox"/> N</p>	<p>None.</p>
<p><b>What existing evidence, local or national, actual or presumed, do you have to support your response?</b></p>	<p>At this stage, the Council considers that the preferred options for draft DM DPD policies as a whole are not likely to have a differential impact on those who have caring responsibilities.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of preferred options for policies across the range of topics in the draft DM DPD. Within Policy H5 support (subject to certain criteria) is given for house extensions and alterations, including basement conversions and annexes. This will help those with caring responsibilities adapt their housing so they can support relatives with dependency needs, such as the elderly or those with disabilities, within their own home. The Council will consider feedback from public consultation including any opportunities that may be identified to address possible differential impacts on those who have caring responsibilities in the borough linked to the policy topic areas being considered. This will feed into the refinement of policies prior to regulation 19 consultation on draft DM policies.</p>		

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

<b>15. Are there concerns that the activity could have a differential impact on grounds of marital status or civil partnership?</b>	Y	<input checked="" type="checkbox"/> N	None.
<b>What existing evidence, local or national, actual or presumed, do you have to support your response?</b>	<p>At this stage, the Council considers that the preferred options for draft DM DPD policies as a whole are not likely to have a differential impact on the grounds of marital status or civil partnership.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of preferred options for policies across the range of topics in the draft DM DPD. The Council will consider feedback from public consultation including any opportunities that may be identified to address possible differential impacts on the grounds of marital status or civil partnership in the borough linked to the policy topic areas being considered. This will feed into the refinement of policies prior to regulation 19 consultation on draft DM policies.</p>		
<b>16. Are there concerns that the activity <u>could</u> have a differential impact due a woman’s pregnancy or maternity?</b>	Y	<input checked="" type="checkbox"/> N	None.
<b>What existing evidence, local or national, actual or presumed, do you have to support your response?</b>	<p>At this stage, the Council considers that the preferred options for draft DM DPD policies as a whole are not likely to have a differential impact based on pregnancy or maternity.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of preferred options for policies across the range of topics in the draft DM DPD. The Council will consider feedback from public consultation including any opportunities that may be identified to address possible differential impacts based on pregnancy or maternity in the borough linked to the policy topic areas being considered. This will feed into the refinement of policies prior to regulation 19 consultation on draft DM policies.</p>		
<b>17. Are there concerns that the activity <u>could</u> have a differential impact due to gender reassignment?</b>	Y	<input checked="" type="checkbox"/> N	None.

Agenda item number: 9  
Appendix 3

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

<p><b>What existing evidence, local or national, actual or presumed, do you have to support your response?</b></p>			<p>At this stage, the Council considers that the preferred options for draft DM DPD policies as a whole are not likely to have a differential impact based on gender reassignment.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of preferred options for policies across the range of topics in the draft DM DPD. The Council will consider feedback from public consultation including any opportunities that may be identified to address possible differential impacts based on gender reassignment in the borough linked to the policy topic areas being considered. This will feed into the refinement of policies prior to regulation 19 consultation on draft DM policies.</p>
<p><b>18. Could any differential impact identified in 8-17 amount to there being the potential for adverse impact in this activity?</b></p>	<p>Y</p>	<p><input checked="" type="checkbox"/> N</p>	<p>No. At this stage the Council is of the view that the preferred options for policies would not hold the potential for adverse impacts from this activity. The Council will however carefully consider responses to the regulation 18 consultation in relation to potential adverse impacts that may be identified by stakeholders and refine the policies further prior to regulation 19 consultation including in the light of these responses.</p>
<p><b>19. Can this adverse impact be justified on the grounds of promoting equality of opportunity for one or more of the protected groups or any other reason?</b></p>	<p>Y</p>	<p>N</p>	<p>Not applicable.</p>

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

Agenda item number: 9  
Appendix 3

<p><b>20. If the activity is of a strategic nature, could it help to reduce inequalities associated with socio-economic disadvantage?</b></p>	<input checked="" type="checkbox"/> <b>Y</b>	<input type="checkbox"/> <b>N</b>	<p>The Council has been mindful of opportunities in this regard in the drafting of preferred options for policies and will continue to be so when reviewing regulation 18 consultation responses and drafting DM policies.</p> <p>Preferred DM DPD policy options, particularly those relating to design and infrastructure may provide a basis for reducing inequalities associated with socio-economic disadvantage and provide an opportunity to plan positively to reduce deprivation and improve social inclusion. This includes in relation to preferred options for requirements for the provision of open space to meet all peoples’ needs. For instance, expectations for the provision of community growing space provide an opportunity to contribute to addressing food insecurity. Furthermore, proposed requirements relating to the provision of different types of open space, as well as ensuring that it is safe for all members of the community provides a basis for ensuring access to these opportunities for all. Further opportunities have been sought to strengthen new-build standards to ensure they are designed for a changing climate, are future-proofed for low-carbon heating, designed and constructed to provide for the comfort, health, and wellbeing of current and future occupiers over the lifetime of the development; and deliver high levels of energy efficiency to provide environmental improvements and reduce fuel poverty. This in turn is intended to contribute to wellbeing and involvement in public life, including for those at a socio-economic disadvantage. The promotion of access to social opportunities also extends to preferred policy options for community facilities. These aim to ensure that facilities are accessible to all and are not unnecessarily lost.</p> <p>The Council will carefully consider responses to the regulation 18 consultation in terms of whether there are further opportunities that could be taken in this regard.</p>
<p><b>21. Is there any concern that there are unmet needs in relation to any of the above protected groups?</b></p>	<input checked="" type="checkbox"/> <b>Y</b>	<input type="checkbox"/> <b>N</b>	<p>At this stage no concerns have been identified in relation to unmet needs in relation to the above-mentioned groups. Many of the needs of protected groups have been addressed by the LPSS.</p>
<p><b>22. Does ‘differential impact’ or ‘unmet need’ cut across one or more of the protected groups (e.g. elder BME groups)?</b></p>	<input checked="" type="checkbox"/> <b>Y</b>	<input type="checkbox"/> <b>N</b>	<p>It is not considered that the policy options and preferred policy approach will have a differential impact, nor that there is an unmet need that cuts across one or more of the protected groups.</p>

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

<p><b>23. If yes, should a full EIA, if necessary, be conducted jointly with another service area or contractor or partner or agency?</b></p>	<p><b>Y</b></p>	<p><b>N</b></p>	<p>Not applicable. At this stage, no need is identified to conduct a full EIA.</p>																																																																													
<p><b>24. Is there a missed opportunity to improve this activity to meet the general duties placed on public bodies to eliminate unlawful discrimination, to advance equality of opportunity and to promote good relations between people who share protected characteristics and those who do not?</b></p>	<p><b>Y</b></p>	<p><b>N</b></p>	<p>The Council is mindful of the aims of the Public Sector Equality Duty (PSED) (section 149 of the Equality Act 2010) and has given and will continue to give particular thought to how the DM DPD preferred options and policies may be formulated in a manner that advances these aims and does not discriminate, including indirectly, on any sector of society.</p> <p>In developing the DM DPD, the Council will continue to have an open mind regarding any potential further opportunities that may be taken to advance equality of opportunity between people who share a protected characteristic and people who do not share it.</p> <p>The Council will continue to be alert to how preferred options and draft policies may or may not impact on particular groups and have due regard to the interests and needs of those sharing the protected characteristics under the Equality Act.</p> <p>The Council will consider responses to the regulation 18 consultation to assist in identifying opportunities to advance the aims of the PSED.</p>																																																																													
<p><b>25. Should the policy proceed to a full equality impact assessment? Please use the scoring process in the right-hand column to guide you.</b></p>	<p><b>Y</b></p>	<p><b>N</b></p>	<table border="1"> <tr> <td colspan="11"> <p>0 – no possible relevance or adverse impact                      1 – extremely low relevance and adverse impact                      2 – relatively low relevance and adverse impact                      3 – medium relevance and adverse impact                      4 - relatively high relevance and adverse impact</p> </td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>0-11 points</td> <td>low adverse impact, no need for full EIA</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>12-20points</td> <td>medium adverse impact, full EIA required</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>21-27 points</td> <td>high adverse impact, full EIA required</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td><b>Age</b></td> <td><b>Disability</b></td> <td><b>Mat</b></td> <td><b>Gender</b></td> <td><b>Marriage</b></td> <td><b>Race</b></td> <td><b>Trans</b></td> <td><b>Sexuality</b></td> <td><b>Religion</b></td> <td><b>Total</b></td> <td><b>Impact</b></td> </tr> <tr> <td>1</td> <td>1</td> <td>0</td> <td>0</td> <td>0</td> <td>1</td> <td>0</td> <td>0</td> <td>1</td> <td>4</td> <td>Low</td> </tr> </table>	<p>0 – no possible relevance or adverse impact                      1 – extremely low relevance and adverse impact                      2 – relatively low relevance and adverse impact                      3 – medium relevance and adverse impact                      4 - relatively high relevance and adverse impact</p>																						0-11 points	low adverse impact, no need for full EIA										12-20points	medium adverse impact, full EIA required										21-27 points	high adverse impact, full EIA required										<b>Age</b>	<b>Disability</b>	<b>Mat</b>	<b>Gender</b>	<b>Marriage</b>	<b>Race</b>	<b>Trans</b>	<b>Sexuality</b>	<b>Religion</b>	<b>Total</b>	<b>Impact</b>	1	1	0	0	0	1	0	0	1	4	Low
<p>0 – no possible relevance or adverse impact                      1 – extremely low relevance and adverse impact                      2 – relatively low relevance and adverse impact                      3 – medium relevance and adverse impact                      4 - relatively high relevance and adverse impact</p>																																																																																
0-11 points	low adverse impact, no need for full EIA																																																																															
12-20points	medium adverse impact, full EIA required																																																																															
21-27 points	high adverse impact, full EIA required																																																																															
<b>Age</b>	<b>Disability</b>	<b>Mat</b>	<b>Gender</b>	<b>Marriage</b>	<b>Race</b>	<b>Trans</b>	<b>Sexuality</b>	<b>Religion</b>	<b>Total</b>	<b>Impact</b>																																																																						
1	1	0	0	0	1	0	0	1	4	Low																																																																						
<p><b>26. If a full EIA is not required, are there any changes required to the proposal to improve it around the equality agenda?</b></p>			<p>There are no changes considered to be required at this point.</p>																																																																													

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

<p><b>27. How will any actions identified in 20. to 26. above be taken forward?</b></p>			<p>Any comments in relation to improving the DM DPD in terms of the potential to support Council's obligations in terms of the PSED will be considered. The regulation 18 consultation is considered to be an opportunity to identify opportunities in this regard.</p>
---	--	--	---

Agenda item number: 9  
Appendix 3

**Signed**



**Riaan van Eeden (completing officer)**

**Date: 14 February 2020**

**Signed**



**Stuart Harrison (Head of Service)**

**Date: 14 February 2020**

**Countersigned**



**Peter Stevens / Sarah-Jane Grant (member of Equality Action Group)**

**Date: 14 February 2020**

# Sustainability Appraisal (SA) of the Guildford Local Plan Part 2: Development Management Policies

Interim SA Report

April 2020

## Quality information

Prepared by	Checked by	Verified by	Approved by
Cheryl Beattie, Senior Environmental Planner	Mark Fessey, Associate Director	Steve Smith, Technical Director	Steve Smith, Technical Director

---

### Prepared for:

Guildford Borough Council

### Prepared by:

AECOM Limited  
Aldgate Tower  
2 Leman Street  
London E1 8FA  
United Kingdom  
aecom.com

© 2020 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") in accordance with its contract with Guildford Borough Council (the "Client") and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.



## Table of Contents

1.	Introduction.....	1
2.	What is the plan seeking to achieve? .....	2
3.	What is the scope of the SA? .....	3
Part 1: What has plan-making / SA involved up to this stage? .....		5
4.	Introduction to Part 1 .....	6
5.	Selecting the reasonable alternatives.....	7
6.	Appraisal of the reasonable alternatives.....	11
7.	Developing the preferred approach .....	16
Part 2: What are the appraisal findings at this stage? .....		17
8.	Introduction to Part 2 .....	18
9.	Appraisal of the Draft Plan.....	19
Part 3: What are the next steps? .....		41
10.	Plan finalisation .....	42
11.	Monitoring.....	42
Appendix I: Regulatory requirements .....		43
Appendix II: The SA Scope .....		47

# 1. Introduction

## Background

- 1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Guildford Borough Local Plan: Development Management (DM) Policies, henceforth 'LPDMP'.
- 1.2 Once in place, LPDMP will supplement the recently adopted Local Plan: Strategy and Sites (2019), which deals with strategy and allocates sites for development. Specifically, LPDMP will provide further and more detailed planning policies for Guildford Borough Council ('the Council') use when making development management decisions, i.e. when determining planning applications.
- 1.3 SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Local Plans must be subject to SA.<sup>1</sup>

## SA explained

- 1.4 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.
- 1.5 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account alongside consultation responses when finalising the plan.
- 1.6 More specifically, the SA Report must answer the following **three questions** -
  - What has Plan-making / SA involved up to this point?
    - including with regards to consideration of 'reasonable alternatives'
  - What are the SA findings at this stage?
    - i.e. in relation to the draft plan
  - What are the next steps?

## This Interim SA Report<sup>2</sup>

- 1.7 At the current stage of plan-making, the Council is consulting on an *early* draft plan, under Regulation 18 of the Local Planning Regulations. This 'Interim' SA Report is therefore produced with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the plan.

### Structure of this report

- 1.8 Although this is an 'Interim' SA Report (and does not therefore need to provide the information required of the SA Report), it is nonetheless helpful to structure this report according to the **three questions** above.
- 1.9 Before answering the first question, there is a need to further set the scene by answering two questions:
  - What is the plan seeking to achieve?
  - What is the scope of the SA?

---

<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document

<sup>2</sup> See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

## 2. What is the plan seeking to achieve?

### Introduction

- 2.1 The aim here is to explain more fully the context to plan preparation and the plan vision / objectives.

### Legislative and policy context

- 2.2 LPDMP is being prepared under the Town and Country (Local Planning) Regulations 2012 and underpinning primary legislation. It must reflect current Government policy as set out in the National Planning Policy Framework (NPPF, 2019) and Planning Policy for Traveller Sites (2015), and must also be prepared mindful of Government's online Planning Practice Guidance (PPG).
- 2.3 LPDMP is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, there is a need to account for the views of Surrey County Council and neighbouring local authorities on a wide range of planning matters including in respect of infrastructure; the Enterprise M3 Local Enterprise Partnership (LEP) on matters relating to the local economy; and a range of organisations in respect of effective planning for the natural environment, historic environment etc.
- 2.4 Finally, it is important to note that LPDMP will be prepared mindful of the 'made' Neighbourhood Development Plans (NDPs) for Burpham, Effingham, East Horsley and West Horsley, as well as several emerging NDPs. NDPs must be in general conformity with the strategic policies in the Development Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that made and emerging NDPs will be a consideration when preparing LPDMP.

### Plan vision and objectives

- 2.5 The aim of LPDMP is to contribute to the achievement of the vision and objectives set out within the adopted LPSS. More specifically, as discussed above, the aim of LPDMP is to sit alongside the adopted plan by providing further and more detailed policies for the Council to use when determining planning applications.

### What is the plan not seeking to achieve?

- 2.6 There is a need to be clear that LPDMP will be overarching in nature, and hence naturally omit consideration of some detailed issues in the knowledge that these can be addressed at subsequent stages of the planning process, including at the planning application / development management stage. In particular, DM policies can never be entirely prescriptive, but rather must provide the Council with some flexibility in respect of matters to be explored through the DM process.

## 3. What is the scope of the SA?

### Introduction

- 3.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan.
- 3.2 The aim here is to introduce the reader to the *broad scope* of the SA. **Appendix II** presents further information; however, it is not possible to define the scope of the SA precisely. Rather, there is a need for the SA scope to be flexible, responding to the scope of the emerging plan / options and evidence base.

### Consultation on the scope

- 3.3 The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>3</sup> As such, these authorities were consulted on an SA Scoping Report in 2019.
- 3.4 The outcome of the scoping process was an SA ‘framework’ comprising 23 objectives, along with a series of associated questions to guide the assessment process. The SA framework is presented in summary below, with the objectives organised under a series of broad topic headings.

### The SA framework

- 3.5 Table 3.1 presents the sustainability topics and objectives that form the ‘backbone’ to the SA scope. N.B. topics are listed here in alphabetical order, but can alternatively be listed according to whether the topic relates to the environment, communities / society or the economy (see Appendix II).

---

<sup>3</sup> In-line with Article 6(3) of the SEA Directive, these bodies were selected because ‘*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.*’

Table 3.1: The SA framework

Topic	Objective(s)
Air quality	Reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure
Biodiversity	Conserve and enhance biodiversity, geodiversity and the natural environment
Climate change adaptation	Build resilience and adapt to the impacts of climate change and extreme weather events such as flood, drought and heat risks particularly on groups more vulnerable to the effects of climate change
Climate change mitigation	Mitigate the causes of climate change through reducing emissions of greenhouse gases and efficient use of natural resources
Digital infrastructure	Ensure that the digital infrastructure available meets the needs of current and future generations
Economy	Maintain Guildford borough and Guildford town's competitive economic role
Education	Improve levels of education and skills in the population overall
Employment land	Facilitate appropriate development opportunities to meet the changing needs of the economy
Flood risk	Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment
Health	Facilitate improved health and well-being of the population, enabling people to stay independent and reducing inequalities in health
Historic environment	Protect, enhance, and where appropriate make accessible, the archaeological land, historic environments and cultural assets of Guildford, for the benefit of residents and visitors
Housing	Meet housing requirements of the whole community and provide housing of a suitable mix and type
Land	Minimise the use of best and most versatile agricultural land and encourage the remediation of contaminated land
Landscape and townscape	Conserve and enhance the quality and local distinctiveness of landscapes and townscapes
Poverty	Reduce poverty and social exclusion for all sectors of the community
Previously developed land	Make the best use of previously developed land (PDL) and existing buildings
Rural economy	Enhance the borough's rural economy
Safe and secure communities	Create and maintain safer and more secure communities and improve the quality of where people live and work
Vibrant communities	Create and sustain vibrant communities
Waste	Reduce waste generation and achieve the sustainable management of waste and materials
Transport	Encourage the use of sustainable forms of transport (walking, cycling, bus, rail)
Water quality	Maintain and improve the water quality of the borough's rivers and groundwater
Water resources	Achieve sustainable water resources management and water conservation

## **Part 1: What has plan-making / SA involved up to this stage?**

## 4. Introduction to Part 1

### Introduction

- 4.1 The aim of this part of the report is not to relay the entire 'story' of plan-making to date, but rather the work undertaken to examine **reasonable alternatives** in early 2020, ahead of the current consultation.
- 4.2 Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with - see **Chapter 5**
  - present an appraisal of the reasonable alternatives - see **Chapter 6**
  - explain the Council's reasons for selecting the preferred option - see **Chapter 7**
- 4.3 Presenting this information is in accordance with the regulatory requirement to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the SA Report (N.B. as stated earlier, this is not the SA Report, but nevertheless aims to present the information required of the SA Report).

### Reasonable alternatives in relation to what?

- 4.4 The legal requirement is to examine reasonable alternatives taking into account the objectives of the plan,<sup>4</sup> which, as discussed above, are the same objectives that were used to guide preparation of LPSS. The SA process for LPSS focused attention on reasonable alternatives in respect of the 'spatial strategy', i.e. the question of how much development should be accommodated in the borough and where should it be located. LPDMP, however, is not dealing with the spatial strategy, hence there is a need to give consideration to what aspects of LPDMP should be the focus of alternatives appraisal.
- 4.5 The Council and AECOM recognised that one approach to identifying alternatives would be to ensure that each and every likely plan policy was developed in light of formal appraisal of reasonable alternatives. However, following discussion it was determined that this approach would not be appropriate, on the basis that reasonable alternatives could not be identified for all emerging policies. This reflected understanding that:
- In order for policy alternatives to be considered reasonable it must be possible to draw meaningful distinctions between them when appraised under the SA framework. Indeed, reasonable alternatives should be distinct to the extent that the appraisal serves to highlight differential 'significant effects' between them given that SA "*should only focus on what is needed to assess the likely significant effects of the plan*".<sup>5</sup>
  - Whilst it is helpful to consider the merits of an emerging policy approach relative to the baseline, or a 'do nothing option', these two options are not reasonable alternatives for SA purposes. This reflects the simple fact that the appraisal of any policy option can be defined as appraisal *against the baseline*. There is a separate regulatory requirement to appraise the emerging draft policies/plan against the baseline – see Part 2.
- 4.6 Following discussions, the Council and AECOM determined that it would be appropriate to appraise reasonable alternatives in respect of a sub-set of key policy areas for which a clear choice between distinct 'do something' alternative policies could be envisaged. Ultimately, it was determined to explore reasonable alternatives in respect of:
- Housing density;
  - Biodiversity net gain; and
  - Parking standards.

<sup>4</sup> Regulation 12(2) requires that, when determining what should be a focus of alternatives appraisal, account is taken of "the objectives and geographical scope of the plan".

<sup>5</sup> See paragraph 009 at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

#### What about other plan issues/objectives?

- 4.7 To reiterate, whilst other policies within the draft plan have emerged without formal alternatives appraisal, Part 2 of this report presents an appraisal of the draft plan as a whole – i.e. the full suite of draft policies in combination - against the baseline. As part of the narrative discussion within Part 2 there is naturally informal consideration of the choices available to the Council in drafting the policies, and ways in which the draft policies might potentially be adjusted to improve their performance in respect of SA objectives.

#### Whose responsibility?

- 4.8 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker (the Council), with AECOM acting in an advisory capacity; appraising the reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the Council.

#### Commenting on this part of the report

- 4.9 Comments are welcomed on:
- the decision to focus on alternatives in respect of the three plan issues listed above (this section);
  - the reasonable alternatives selected for appraisal in each instance (Section 5);
  - the appraisal of reasonable alternatives in each instance (Section 6); and
  - the Council's reasons for supporting the preferred option in each instance (Section 7).

## 5. Selecting the reasonable alternatives

### Introduction

- 5.1 The aim here is to discuss “outline reasons for selecting the alternatives dealt with” in respect of the three emerging policy areas / issues for which it was determined appropriate to formally explore reasonable alternatives, as discussed above, namely:
- Housing density;
  - Biodiversity net gain; and
  - Parking standards.
- 5.2 Each of these policy areas / issues is considered in turn below.

### Housing density

#### Discussion

- 5.3 The NPPF states that the creation of high quality building and places is fundamental to what the planning and development process should achieve. It requires planning policies and decisions to promote and support development that makes efficient use of land.
- 5.4 Planning Practice Guidance also includes guidance on the efficient use of land and identifying appropriate densities. This includes considerations of accessibility, character, environmental constraint, infrastructure provision and development viability.
- 5.5 The National Design Guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. The guidance identifies that well-designed new development will make efficient use of land with an amount and mix of development and open space that optimises density. The guide notably states that, to optimise density, it may be necessary to provide public transport infrastructure or to improve existing local transport services, and, it follows, that a transport hub may represent an opportunity for a local increase in density, where appropriate to local context and character.

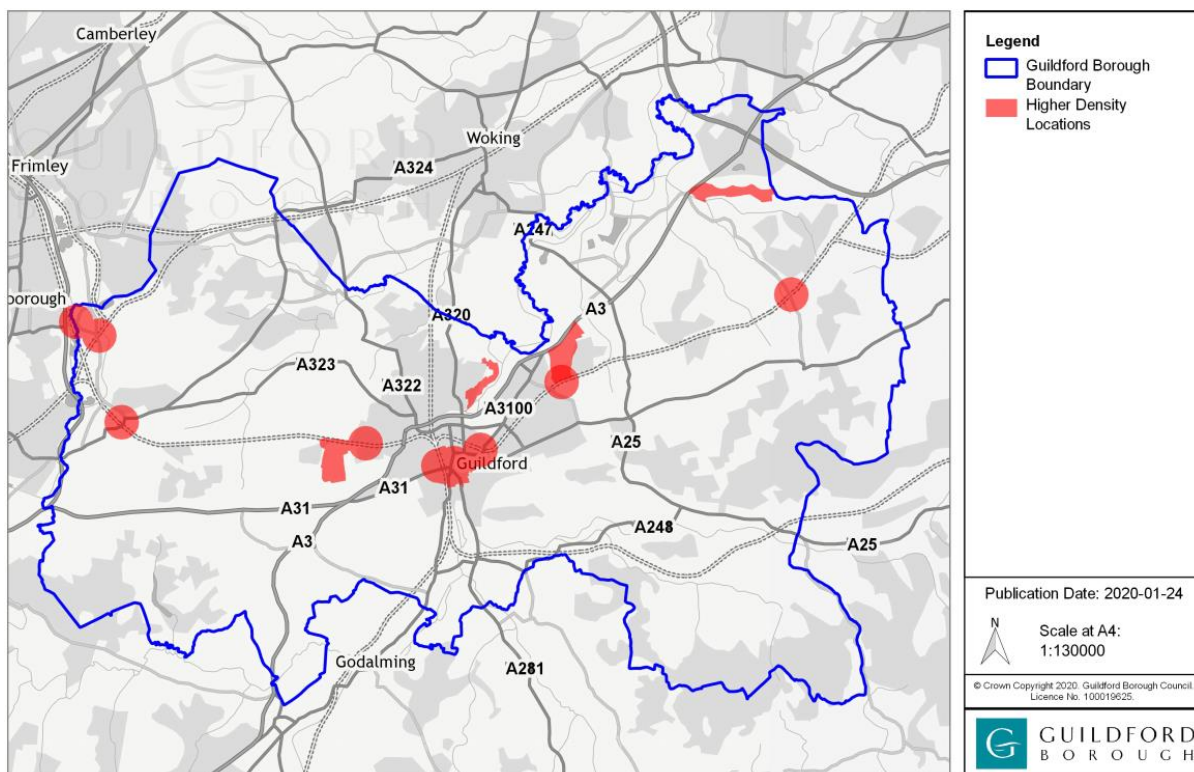


- 5.6 There are established local objectives and policies related to securing the optimum use of land whilst respecting local character and environmental capacity. In particular, key policies within LPSS are: Policy S3 (Delivery of development and regeneration within Guildford Town Centre); Policy H1 (Homes for all); Policy D1 (Place shaping); and Policy ID3 (Sustainable transport for new developments).
- 5.7 However, there are recognised challenges locally that serve to identify the need for further and more detailed policy. For example, the development industry can favour large 4-5 bed homes in rural areas, which don't make the optimal use of land. The impact of low housing density ultimately results in the use of more land for housing.

**The reasonable alternatives**

- 5.8 Through discussions a tentative emerging preferred approach was identified, specifically one seeking to encourage optimal use of land through appropriate densities by A) listing key criteria that must be taken into account and B) identifying three broad types of location where higher densities should be explored, namely Guildford town centre, at strategic sites and at sites within 500m of a defined transport hub (these are designated by Policy E2 of the LPSS). This approach is flexible, rather than prescriptive, in that there is potential for discretion to be applied through the DM process, taking account of particular local and site-specific factors.
- 5.9 An alternative policy approach would involve being more prescriptive, with minimum density ranges set according to location - see Figure 5.1 - irrespective of local context and character (within reason, i.e. unless there are strong reasons why the minimum density could not be achieved).
- 5.10 In summary, the following two reasonable alternatives were established:
  - **Option 1** – a flexible criteria-based policy
  - **Option 2** – a more prescriptive policy with minimum densities for specific areas (see Figure 5.1)

Figure 5.1: Areas suited to higher densities (the town centre, strategic sites and sites close to a transport hub)



## Biodiversity net gain

### Discussion

#### Planning for biodiversity

- 5.11 It is known that biodiversity is declining globally at a rate unprecedented in human history. Nationally, human-driven land use changes (including agricultural intensification) have contributed to the loss and fragmentation of semi-natural habitats. Combined with other pressures, such as new development, climate change, air and water pollution, the impact on nature from human activity has been significant.
- 5.12 The State of Surrey's Nature Report (2017)<sup>6</sup> identifies that species loss within Surrey is worse than nationally, with figures indicating a significant loss of species with 21% of species in decline. Guildford stands-out as a key borough within Surrey, containing internationally, nationally and locally protected habitats and species associated with a wide range of terrestrial landscape types as well as nationally and locally significant habitats associated with the River Wey and its tributaries.
- 5.13 The NPPF requires planning policies and decisions to contribute to and enhance the natural environment. Local Plans should protect and enhance valued sites; ensure that they are linked or otherwise functionally connected at landscape scales; recognise and plan for the wider benefits of natural capital including in terms of ecosystem services provided; and, deliver measurable net gains in biodiversity at appropriate scales. Planning for green infrastructure (GI) is an important element of the national strategy, with Natural England's guidance on GI (2009)<sup>7</sup> highlighting the multifunctional benefits of GI.
- 5.14 At the County scale, the Surrey Nature Partnership is working with local authorities to set out an approach to conserving and enhancing biodiversity at landscape scales. The Natural Capital Investment Plan<sup>8</sup> (NCIP) for Surrey sets out the broad actions for the next 25 years, including focusing on a network of Biodiversity Opportunity Areas (BOAs). These are areas where there are concentrations of important sites and within which habitat management and creation can be most effective in terms of biodiversity.
- 5.15 There are established local objectives and policies relating to biodiversity. A key policy within the adopted Local Plan is Policy ID4 (Green and blue infrastructure) which provides protection for European, national and local designated sites, seeks where appropriate that new developments deliver gains in biodiversity and also establishes the need to take account of the presence of BOAs. Policy ID4 reflects the international and national shift away from protection of sites to proactive intervention at landscape scales.

#### Planning for biodiversity net gain

- 5.16 As discussed, the NPPF is supportive of biodiversity net gain approaches, which can be defined as "development that leaves biodiversity in a better state than before".<sup>9</sup> Specifically, paragraph 170 states that planning policies and decisions should minimise impacts on and provide net gains for biodiversity; paragraph 174 requires plans to pursue opportunities for securing measurable net gains; paragraph 175 requires planning decisions to encourage biodiversity improvements in and around developments; and paragraph 118 states that the planning system should take opportunities to secure net environmental gains.
- 5.17 Established Biodiversity Net Gain (BNG) approaches use habitats as a proxy for biodiversity in a given area, recognising that certain habitats will tend to support certain communities of species. By using habitat extent, quality and diversity as proxy measures, decision-makers can understand likely biodiversity losses or gains due to development. A key component of the BNG approach is the mitigation hierarchy (avoid, reduce, mitigate, compensate/offset), which ensures that a development proposal seeks to first avoid losses in biodiversity, where possible. Decision-making that adopts a BNG approach seeks to avoid or minimise biodiversity impacts in the first instance, and then deliver gains through habitat creation or enhancement.

<sup>6</sup> Surrey Nature Partnership (2017) The State of Surrey's Nature [online] available at:

[https://surreynaturepartnership.files.wordpress.com/2014/11/state-of-surreys-nature\\_web.pdf](https://surreynaturepartnership.files.wordpress.com/2014/11/state-of-surreys-nature_web.pdf)

<sup>7</sup> Natural England (2009) Natural England's Green Infrastructure Guidance (NE176) [online] available at:

<http://publications.naturalengland.org.uk/publication/35033>

<sup>8</sup> Surrey Nature Partnership (2018) Natural Capital Investment Plan for Surrey. [online] available at:

<https://surreynaturepartnership.files.wordpress.com/2018/03/natural-capital-investment-plan-forsurrey.pdf>

<sup>9</sup> Biodiversity Net Gain. Good practice principles for development. A practical guide, CIEEM (2019)

<https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development-a-practical-guide/>

- 5.18 Defra undertook consultation in 2018 with respect to the concept of mandatory BNG within the planning system, and, in the 2019 spring statement,<sup>10</sup> the Chancellor committed to making BNG mandatory as part of the forthcoming Environment Bill. Defra advocates application of a metric at the planning application stage to gauge the degree of biodiversity impact (following application of prescribed steps to ensure that effects are avoided and mitigated as fully as possible), and then delivery of necessary compensation in-line with prescribed rules.
- 5.19 The Defra approach is reflected in BNG “Metric 2.0”, a Beta version of which was released in July 2019. The Defra metric is based on application of a series of criteria to the assessment of habitat units, so that each habitat unit can be translated into “biodiversity units”. In simple terms, to achieve net gain, the biodiversity units score, at an agreed scale, must be increased as a result of development. The criteria used to translate habitat units into biodiversity units cover: distinctiveness / rarity, condition and extent.
- 5.20 Metric 2.0 also makes reference to Natural England’s National Habitat Network (NHN) Mapping.<sup>11</sup> This is a spatial dataset that describes the geographic extent and location of Habitat Networks for 18 priority habitats with additional data added to highlight areas where there is greatest potential for effective delivery of new priority habitats, either through creation or restoration. The NHN is designed for use alongside local knowledge to ensure that delivery of new priority habitat contributes most effectively to ecological networks / ecological connectivity at a landscape scale.
- 5.21 It is also important to note that the Environment Bill also proposes to introduce the requirement for Local Nature Recovery Strategies (LNRS) in England. It is understood that LNRS are intended to set out (by mapping existing nature assets and opportunities for enhancement) priorities and opportunities for protecting and investing in nature within a landscape context.

### The reasonable alternatives

- 5.22 The emerging Environment Bill<sup>12</sup> and latest government guidance<sup>13</sup> indicates the likelihood of a mandatory requirement for development in England to deliver ‘biodiversity net gain’ of 10%, hence this is clearly a reasonable option to explore for LPDMP. However, the Council believes that there may be an argument for requiring a more ambitious approach, noting local biodiversity sensitivities / issues and opportunities, and in light of initial analysis that serves to suggest that the financial burden to the developer increases only to a limited extent if the requirement is set at 20% rather than 10%.
- 5.23 As such, the following two reasonable alternatives were established:
- **Option 1** – 10% mandatory biodiversity net gain
  - **Option 2** – 20% mandatory biodiversity net gain

## Parking standards

### Discussion

- 5.24 Car ownership in the UK has risen steadily over the past 60 years, and despite some efforts in more recent decades to improve infrastructure and services to encourage people to make journeys on foot, by bicycle, on buses and trains, the need to provide for appropriate levels of parking in new development remains important. This is because both under and over provision can lead to a number of problems for new development and adjacent neighbourhoods. Amongst other things, over-provision can be visually detrimental and, by contributing to lower densities can increase the cost of new homes, whilst under-provision, amongst other things, can lead to obtrusive parking and overspill parking in nearby areas.

<sup>10</sup> Net Gain Consultation Proposals, Defra (2018) <https://consult.defra.gov.uk/land-use/net-gain/>

<sup>11</sup> National Habitat Networks (England), Natural England (2019) <https://data.gov.uk/dataset/0ef2ed26-2f04-4e0f-9493-ffbdbfaeb159/national-habitat-networks-england>

<sup>12</sup> Bill 009 2019-21

<sup>13</sup> Defra (2019) Net gain Summary of responses and government response [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/819823/net-gain-consult-sum-resp.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf)

- 5.25 A policy shift has occurred over time, from a maximum-standard approach pre-NPPF, to a more tailored approach since 2012. The current NPPF (2019) indicates that local authorities should only impose maximum parking standards for residential and non-residential development where there is clear and compelling justification necessary to the management of the local road network, or in order to optimise the density of development in city and town centres and other locations that are well served by public transport. Non-statutory guidance from Surrey County Council<sup>14</sup> indicates parking standards in residential development should be tapered from higher maximum standards in suburban/edge/village/rural locations to lower maximum standards in town centre locations. Conversely, Neighbourhood Plans have included policies defining minimum parking standards in order to realise a greater number of on-plot parking spaces.
- 5.26 The Local Plan: Strategy and Sites (2019) signals that a Parking Supplementary Planning Document (SPD) will be prepared by the Council. Policy ID3 requires that development proposals provide an appropriate level of off-street vehicle parking such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users. It also states that consideration will be given to setting maximum parking standards for Guildford town centre in the SPD.
- 5.27 In advance of the forthcoming Parking SPD, the Draft Strategic Development Framework SPD (January 2020) includes electric vehicle charging standards for the strategic sites and also guidance on the design of on street car parking within new developments and the minimum dimensions of car parking spaces.
- 5.28 A new policy could be provided in LPDMP that supplements Policy ID3. This would then further define the policy parameters, with the detailed guidance provided in a Parking SPD.

### The reasonable alternatives

- 5.29 Through discussions an emerging preferred approach was identified, to set maximum parking standards within the town centre, then a single minimum standard across the other areas. This differs from the current approach sought by Surrey County Council for tapered maximum standards.
- 5.30 As such, the following two reasonable alternatives were established:
- **Option 1** – a maximum standard for within the town centre, with a *single minimum* standard across the rest of the Borough
  - **Option 2** – a maximum standard for residential development within the town centre, with *tapered maximum* standards across the rest of the Borough

N.B. the decision was taken to focus on the matter of residential developments, although it is recognised that there are also issues associated with delivering parking for non-residential developments.

---

<sup>14</sup> Surrey County Council (2018) Vehicular and Cycle Parking Guidance [online] available at: [https://www.surreycc.gov.uk/data/assets/pdf\\_file/0005/155660/January-2018-Parking-Guidance-for-Development.pdf](https://www.surreycc.gov.uk/data/assets/pdf_file/0005/155660/January-2018-Parking-Guidance-for-Development.pdf)

## 6. Appraisal of the reasonable alternatives

### Introduction

6.1 The aim of this chapter is to present assessment findings in relation to the alternatives introduced above.

### Assessment methodology

6.2 **Tables 6.1 – 6.3** present the assessment findings in relation to the three policy areas for which options have been established (housing density, biodiversity net gain, and parking standards).

6.3 With each table:

Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects', using **red** (significant negative effect), **amber** (moderate or uncertain negative effect), no colour (no significant effect), **light green** (moderate or uncertain positive effect) and **dark green** (significant positive effect) and also rank the alternatives in order of performance, where one (also highlighted by a gold star) is best performing. Also, '=' is used to denote where it not possible to differentiate the alternatives with any confidence.

6.4 Every effort is made to predict effects / differentiate the scenarios accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects / differentiate accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions in order to reach a conclusion on a likely effect, this is made explicit in the assessment text.

6.5 Finally, it is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. the effects of the plan in combination with other planned or on-going strategic activities).

### Assessment findings

6.6 As discussed, alternatives assessment findings are presented within the three tables below. To reiterate, the alternatives are as follows:

- Density -

Option 1 – a flexible criteria-based policy

Option 2 – a more prescriptive policy with minimum densities for specific areas (see Figure 5.1)

- Biodiversity net gain -

Option 1 – 10% mandatory biodiversity net gain

Option 2 – 20% mandatory biodiversity net gain

- Parking standards (residential) -

Option 1 – a *single minimum* standard outside of the town centre

Option 2 – *tapered maximum* standards outside of the town centre

## Housing density

Table 6.1: Housing density – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	2	★1	<p>There are a range of considerations that can assist in establishing appropriate densities for a site or a particular area, such as accessibility, character, environmental and infrastructure constraints and site viability. It follows that a flexible approach (Option 1) can potentially lead to negative impacts being avoided and opportunities realised in respect of wide ranging sustainability objectives. However, this assumes effective decision-making at the development management / planning application level, guided by clear guiding criteria. In this respect, the Strategic Development Framework Supplementary Planning Document (SPD, 2020) generates confidence given its focus on Borough-wide design principles (Part 2 of the SPD) and its presentation of detailed 'development frameworks' for each of the five strategic locations for growth within the Borough. Amongst other things, the SPD explains that: <i>"The starting point for every strategic development proposal must be a detailed observation of the strategic site and its physical context. [Such a] study will be expected to be thorough and detailed given the nature and complexities of each site. This is of key importance in gaining an understanding of place and to ensure locally distinctive and responsive designs."</i> The SPD generates confidence that decisions on density will be made taking into account: landscape context, including <i>"wider historical, social, cultural and physical"</i> dimensions; transport connectivity (<i>"Traffic levels in Guildford have an impact on the quality of everyday life for all residents and the development proposals for the strategic locations should lead the way in establishing a new benchmark for sustainable travel..."</i>); and the need to respond to biodiversity / green infrastructure constraints and opportunities (<i>"The adjacent land uses of a site must be clearly identified and accounted for... This will include.. ensuring that development positively addresses edges that comprise an area of open space, waterbody, or riverside, notably the River Wey..."</i>). The SPD also explains the important role of the Design and Access Statement (DAS) submitted as part of planning applications, which must demonstrate how design and layout has responded to existing land uses, setting and landscape context and the socio-economic context.</p> <p>A more prescriptive approach (Option 2) could lead to negative impacts in the Guildford town centre, given variations in topography and historic character, as highlighted in the recently adopted the Guildford Town Centre Views SPD, which identifies 15 important view cones. Alternatively, the localised constraints that exist within the town centre might lead to a "lowest common denominator" minimum density being set, which would run counter to the objective of maximising densities in-line with transport accessibility. Outside of the town centre, the reality is that most growth over the plan period in proximity to a transport hub (see Figure 5.1) is either already committed or a strategic allocation for which guidance on density already exists. There will be additional windfall growth in proximity to transport, but such sites are less suited to a prescriptive approach to density.</p> <p>In conclusion, it is difficult to argue against allowing for flexibility in respect of setting densities, although it is considered appropriate to flag a risk in respect of <b>air quality</b> and <b>climate change mitigation</b> as these are factors that might be taken into account more fully as part of a strategic exercise to set minimum development densities.</p> <p>With regards to effect significance, neither of the alternatives are predicted to result in significant effects in respect of any SA topic.</p>
Biodiversity	★1	2	
Climate change adaptation	★1	2	
Climate change mitigation	2	★1	
Digital infrastructure	★1	2	
Economy	★1	2	
Education	★1	2	
Employment land	★1	2	
Flood risk	★1	2	
Health	★1	2	
Historic environment	★1	2	
Housing	★1	2	
Land	★1	2	
Landscape and townscape	★1	2	
Poverty	★1	2	
Previously developed land	★1	2	
Rural economy	★1	2	
Safe / secure communities	★1	2	
Vibrant communities	★1	2	
Waste	★1	2	
Transport	★1	2	
Water quality	★1	2	
Water resources	★1	2	

## Biodiversity net gain

Table 6.2: Biodiversity net gain – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	2	1	<p>With respect to <b>biodiversity</b>, there is a clear argument to suggest that Option 2 (20%) is preferable given rates of biodiversity loss in Surrey relative to the rest of England (largely due to high development pressure given proximity to Greater London). A requirement for 10% net gain would lead to greater uncertainty over whether BNG would, in practice, be achieved overall (at functional landscape scales). At the national scale, CIEEM argue that 10% may be within the margin of error for the valuation of habitats, and it may be too low to deliver real benefits. CIEEM has stated that they would like to see a minimum 20% net gain “<i>accompanied by clear requirements to account for the sources and likely accuracy of the data, for example distinguishing between field survey data and estimating area from online maps.</i>”<sup>15</sup></p> <p>With regards to <b>wider environmental and community objectives</b>, as a first point it is important to note that the Environment Bill sets out an intention to “<i>introduce a mandatory requirement for biodiversity net gain in the planning system, to ensure that new developments enhance biodiversity and create new green spaces for local communities to enjoy</i>” [emphasis added]. More specifically, it is well established that mandatory biodiversity net gain, at a landscape scale delivered in the context of a LNRS, presents an opportunity to deliver wider environmental net gain(s) (ENG). The concept of ENG was introduced in the 25 Year Environment Plan (2018), which stated that the Government wants to “<i>establish strategic, flexible and locally tailored approaches that recognise the relationship between the quality of the environment and development. That will enable us to achieve measurable improvements for the environment – ‘environmental net gains’ – while ensuring economic growth and reducing costs, complexity and delays for developers.</i>” The 25 YEP did not define ENG, but the Government’s response to the consultation on mandatory BNG defined it as “<i>improving all aspects of environmental quality through a scheme or project. Achieving environmental net gain means achieving biodiversity net gain first and going further to achieve net increase in the capacity of affected natural capital to deliver ecosystem services</i>”.<sup>16</sup> In practice, it is understood that the Defra Biodiversity Metric 2.0 will be complemented by analysis using the ‘Eco-Metric’. This tool (developed by Natural England and the University of Oxford) will be used to “<i>measure the net changes in natural capital and the ecosystem services it provides as a result of land-use change or development</i>”.<sup>17</sup> It is, however, worth noting that there may not be a gain in all ecosystem services, and there may be trade-offs between services (e.g. a potential gain in pollination services at expense of food production in the case of creating wildflower grassland on agricultural land).</p> <p>In conclusion, an ambitious approach to BNG is supported in respect of the majority of objectives, although there is perhaps a degree of risk in respect of <b>housing</b> and <b>employment land</b> objectives. Risks are uncertain as current understanding is that a 20% requirement would not lead to an unacceptable financial burden on the developer. Further evidence is required to understand the scale of the risk involved.</p> <p>With regards to effect significance, it is possible to predict likely significant positive effects under Option 2 in respect of biodiversity, with other effects much more uncertain and likely to be of lower significance.</p>
Biodiversity	2	★1	
Climate change adaptation	2	★1	
Climate change mitigation	2	★1	
Digital infrastructure	=	=	
Economy	2	★1	
Education	2	★1	
Employment land	★1	2	
Flood risk	2	★1	
Health	2	★1	
Historic environment	2	★1	
Housing	★1	2	
Land	2	★1	
Landscape and townscape	2	★1	
Poverty	2	★1	
Previously developed land	=	=	
Rural economy	2	★1	
Safe / secure communities	2	★1	
Vibrant communities	2	★1	
Waste	=	=	
Transport	2	★1	
Water quality	2	★1	
Water resources	2	★1	

<sup>15</sup> <https://cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf>

<sup>16</sup> <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

<sup>17</sup> <https://ecosystemsknowledge.net/ecometric>

## Parking standards

Table 6.3: Parking standards – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	★1	2	<p>There are arguments for restricting car parking from a climate change mitigation perspective, and also potentially from a health perspective, which might potentially be achieved through the definition of maximum parking standards (Option 2). Specifically, restriction of parking spaces can stimulate modal shift away from use the private car towards use of active (walking, cycling) and public (buses, trains) modes of transport. There are also arguments to suggest restricted parking can lead to more land being made available for other uses, which could lead to benefits in respect of other sustainability objectives.</p> <p>However, it is a challenge to conclude benefits with any confidence. This is because residents might respond to a restricted number of parking spaces by parking on-roads, which can also cause problems in respect of localised traffic congestion and impacts to the urban realm. Whilst it is recognised that design and enforcement (such as yellow lines) can provide mitigation, residual impacts can include:</p> <ul style="list-style-type: none"> <li>• <b>Air quality</b> – increased stop-start leads to increased air pollution.</li> <li>• <b>Climate change mitigation</b> – on-road parking can pose problems for bus movements and also dissuade cyclists.</li> <li>• <b>Safe/secure communities</b> – on-road parking can be an impediment to both safe cycling and safe walking including for those with mobility challenges, e.g. wheelchair and mobility scooter users.</li> <li>• <b>Historic environment</b> – on-road parking can impact on the urban realm, potentially with implications for the setting of historic assets.</li> </ul> <p>There is also a need to consider the risk of insufficient parking serving to restrict the shift towards electric vehicles, as such vehicles require designated parking spaces with access to a charging point. This could lead to negative implications in respect of climate change mitigation and air quality, but also in terms of the economy, recognising that electric vehicle production is a potential major economic growth area.</p> <p>There is also a need to consider the risk of insufficient parking in more rural areas leading to a situation whereby residents struggle to access services and facilities and employment. Under Option 2 maximum standards would be tapered, but there might nonetheless be a risk that maximum standards prove overly restrictive in some instances, e.g. if the accessibility of a location reduces over time, perhaps because of the loss of a bus service or a local school or GP surgery closing. However, effects are mostly uncertain and likely to be relatively marginal.</p> <p>This discussion has so far served to highlight quite wide-ranging benefits associated with supporting <i>minimum</i> parking standards; however, it will be important to ensure that such standards are not set too high such that opportunities for low-car development outside of the town centre are unduly restricted. For example (and notably), it will be important not to restrict the potential to bring forward low-car developments within those parts of the Weyside Urban Village, Blackwell Farm and Gosden Hill Farm strategic allocations that are served by the Sustainable Movement Corridor (e.g. the two “high density hubs” at Gosden Hill Farm identified by the Draft SDF SPD).</p> <p>In conclusion, Option 1 is supported in respect of <b>a number of objectives</b>, including ‘transport’ on balance. However, Option 1 leads to tensions in terms of <b>land</b> and <b>flood risk</b> (due to impermeable hard-standing leading to increased surface water runoff), and there are question marks in respect of <b>climate change mitigation</b> and <b>health</b>. Significant effects are not predicted.</p>
Biodiversity	=	=	
Climate change adaptation	=	=	
Climate change mitigation	?	?	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	2	★1	
Health	?	?	
Historic environment	★1	2	
Housing	=	=	
Land	2	★1	
Landscape and townscape	★1	2	
Poverty	=	=	
Previously developed land	=	=	
Rural economy	★1	2	
Safe / secure communities	★1	2	
Vibrant communities	=	=	
Waste	=	=	
Transport	★1	2	
Water quality	=	=	
Water resources	=	=	



## 7. Developing the preferred approach

### Introduction

- 7.1 The aim of this section is to present the Council's response to the three alternatives appraisal tables presented in Section 6 and, in turn, present the Council's reasons ('justification') for selecting a preferred option in each case.

### Housing density

- 7.2 The preferred option is Option 1 for the following reasons (text provided by the Council):

"The NPPF and PPG set out a range of considerations and tools that can assist in establishing appropriate densities on a site or in a particular area, such as accessibility, characterisation and design studies, environmental and infrastructure assessments and site viability. This is considered preferable to setting minimum density ranges for specific locations (the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges). To set out minimum density ranges is considered to be restrictive and complicated to ascertain and will limit the flexibility that is often needed when determining a planning application.

The Council's preferred option requires the optimal use of land by building homes at the most appropriate density. It is considered the most appropriate approach for Guildford. To apply prescriptive density ranges would restrict the flexibility to take all the site constraints and considerations into account. Sites within Guildford can often have their own challenges, such as the topography of the site, being partially within the flood plain or the impact on views which are crucial to the character and setting of the town centre. Flexibility is needed to ensure the right development can take place. Whilst seeking the optimum use of the land there also needs to be flexibility to ensure that a well-balanced range of housing can come forward to meet Guildford's housing needs.

When considering the relevant issues and options for housing density in Guildford, the Council's preferred approach is to enable well-designed housing at an appropriate density. There will be a presumption for higher density development in the Town Centre. In the Town Centre there are more limited opportunities for development, yet it is a sustainable location so housing density needs to be optimised. There will also be a presumption for higher density development on strategic sites and within 500 metres of existing or planned transport interchanges. This is because the size of strategic sites will enable thoughtfully designed higher densities, and being in close proximity to transport interchanges enables opportunities to optimise densities on sustainable sites.

The results of the assessment suggest that the preferred option provides a greater amount of guidance and flexibility specific to Guildford borough to help meet the relevant Local Plan objectives."

### Biodiversity net gain

- 7.3 The preferred option is Option 2 for the following reasons (text provided by the Council):

"Adopting a BNG of 20 per cent is considered more reasonable than 10 per cent given rates of biodiversity loss in Surrey. At 10 per cent there is greater uncertainty over whether BNG will be achieved overall, and the cost of increasing the BNG level from 10 to 20 per cent does not appear to be prohibitive. Adoption of the standard is subject to full plan viability testing."

### Parking standards

- 7.4 The preferred option is Option 1 for the following reasons (text provided by the Council):

"The preferred option takes a spatially-differentiated approach to the provision of vehicle parking for new residential developments, with the focus of restraint on Guildford town centre. In areas of the borough outside Guildford town centre, the preferred option seeks to manage and avoid potential problems of congested on-street parking in new development and overspill parking on adjacent local streets. Standards for both the minimum provision of cycle parking and electric vehicle charging facilities are the same for both options considered."

## **Part 2: What are the appraisal findings at this stage?**

## 8. Introduction to Part 2

- 8.1 The aim of this part of the report is to present an appraisal of the Draft LPDMP.
- 8.2 This introductory section presents an overview of the Draft LPDMP and discusses appraisal methodology.

### Overview of the Draft LPDMP

- 8.3 The Draft LPDMP presents 38 policies under the following headings:

- Housing
- Economy
- Protecting
- Design
- Infrastructure and delivery

### Appraisal methodology

- 8.4 The appraisal identifies and evaluates ‘likely significant effects’ of the plan, as a whole, on the baseline situation in respect of the sustainability topics/objectives that comprise the SA framework (see Table 3.1).
- 8.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and an understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility to the non-specialist). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Draft LPDMP in more general terms.
- 8.6 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations (2004). So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for LPDMP to impact on the baseline when implemented alongside other plans, programmes and projects that are ‘in the pipeline’. These effect ‘characteristics’ are described within the appraisal as appropriate.

### Adding structure to the appraisal

- 8.7 Whilst the aim is essentially to present an appraisal of Draft LPDMP ‘as a whole’, it is appropriate to also give consideration to individual elements of the plan in isolation. As such, each of the topic-specific appraisal narratives is broken-down under sub-headings – see Table 8.1.

*Table 8.1: Structure of each topic-specific appraisal narrative*

Sub-heading	Aims of the narrative
Commentary on policies	Discuss policies in isolation and in combination and make recommendations.
Appraisal of the plan as a whole	Predict and evaluate significant effects of the Draft LPDMP

N.B. Specific policies are referred to only as necessary within the narratives below. It is not necessary to give systematic consideration to the merits of every plan policy in terms of every sustainability topic/objective.

## 9. Appraisal of Draft LPDMP

### Introduction

- 9.1 The aim of this chapter is to present an appraisal of Draft LPDMP under the 23 SA topics that comprise the SA framework (see Table 3.1), drawing on the issues and objectives established through scoping.

### Air quality

- 9.2 Sustainability objective:

- Reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure

#### Commentary on draft policies

- 9.3 Air quality in Guildford is generally good and meets the National Air Quality Standard for nitrogen dioxide (NO<sub>2</sub>). However, road traffic is a significant cause of air pollution in the borough. Public Health England estimates that in Guildford Borough 5.7 per cent of deaths of those aged 25 years and over arise from long-term exposure to anthropogenic particulate air pollution.
- 9.4 There are currently two Air Quality Management Areas (AQMAs) declared in the Borough due to exceedances of the annual mean Air Quality Strategy (AQS) objective for NO<sub>2</sub> at 'The Street, Compton' (declared in 2017) and 'Shalford' (declared in 2019).
- 9.5 The NPPF requires the prevention of new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution and wherever possible, help to improve local environmental conditions. Para 181 states that planning policies should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and seek opportunities to improve air quality, such as through traffic and travel management, and green infrastructure provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.
- 9.6 LPDMP does not propose any further growth to that outlined in LPSS which could further affect air quality. The 2018 SA Report Addendum for LPSS draws attention to the findings of the 2017 Air Quality Review which concludes that the effects of LPSS on annual mean NO<sub>2</sub> concentration will be negligible in the majority of the Borough. However, further detailed modelling is identified as a requirement for certain locations including the A3, Ripley Bypass; Aldershot East; and the area around the A3/ A31 junction at Onslow Village. Also the large-scale development proposed at Wisley Airfield is noted for potential significant adverse effects on air quality due to an anticipated significant change in vehicle flows on the A3.
- 9.7 In this respect, LPDMP provides enhanced policy mitigation which is likely to support air quality improvements and address the potential impacts arising from large-scale development sites proposed through LPSS to a large extent. LPDMP proposes the addition of **Policy P11** (Air Quality and Air Quality Management Areas) with the identified aim of reducing "*exposure to poor air quality across the borough*" and improving levels of air pollutants within AQMAs. The policy is intended to "*only permit development where it will not give rise to adverse impacts on health and quality of life from air pollution*", further to this "*development proposals within or adjacent to an AQMA will be expected to be designed to mitigate the impact of poor air quality on future occupiers*". Development proposals which have the potential for significant air quality impacts will be required to submit an air quality assessment. This is identified as any development; classed as major development which has the potential for impacts individually or cumulatively; likely to result in increased emissions within an AQMA; introducing biomass technology; or introducing new sensitive receptors within an AQMA. Further to this, where an air quality assessment identifies an unacceptable residual impact on air quality, an "*emissions mitigation assessment and cost calculation will be required*". The preferred policy draft also outlines that development will be required to "*demonstrate conformity with the Institute of Air Quality's guidance*".

- 9.8 Policy guidance in relation to sustainable transport is also set to be significantly enhanced by LPSS, with positive implications for air quality. This must be considered alongside the growth strategy of LPSS which maximises sustainable transport access and seeks to reduce the need to travel. The delivery of two new rail stations and a 'Sustainable Movement Corridor' as proposed through LPSS will deliver significant transport improvements in this respect and indirectly benefit air quality. The additional policy provisions of LPDMP for improvement of the cycle network (**Policy ID10**) and parking standards (**Policy ID11**) will also contribute to improved access and more sustainable movements; supporting reduced congestion levels to the indirect benefit of air quality. In relation to parking, the policy draft recognises the effects of under-provision in respect of causing congestion on local streets (see further discussion in Section 6)
- 9.9 The retention and enhancement of open green spaces, as well as a requirement for biodiversity net gain, is also likely to support air quality. LPDMP provides more detailed policy requirements for; biodiversity net gain (**Policy P7**); the protection of existing open spaces (**Policy ID5**); and the provision of new spaces in new development (**Policy ID6**), indirectly providing minor benefits for air quality.
- 9.10 Finally, in respect of housing density (**Policy H4**), air quality implications of a flexible criteria-based policy are discussed in Section 6 of this report, with the conclusion reached that the proposed policy approach gives rise to a degree of concern, in that air quality considerations might potentially be most affectively addressed through a prescriptive approach deriving from a strategic process of evidence gathering an analysis. These concerns are uncertain, given good potential to take account of air quality and wide-ranging further considerations through the development management process; however, it is **recommended** that further work is undertaken to understand the strategic constraints and opportunities that exist.

### Appraisal of the Draft LPDMP

- 9.11 Draft LPDMP supports the provisions of LPSS with supplementary and more detailed guidance in relation to managing air quality impacts with the aim of both avoiding and mitigating potential negative effects, particularly those arising as a result of the growth strategy proposed through LPSS. A potential tension is highlighted in respect of the proposed flexible criteria-based approach to development density, although this is highly uncertain. Overall **minor positive effects** are anticipated.

## Biodiversity

- 9.12 Sustainability objective:

- Conserve and enhance biodiversity, geodiversity and the natural environment

### Commentary on draft policies

- 9.13 Guildford Borough has a wide range of habitats and species, many of which are threatened or endangered. Priority habitats include heathland, ancient semi-natural woodland and semi-improved grasslands, along with important river habitats. Sites consisting of lowland heathland habitat form part of the Thames Basin Heath Special Protection Area (SPA) and Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC). There are also numerous Sites of Special Scientific Interest (SSSIs) throughout the Borough, as well as locally designated Sites of Nature Conservation Importance (SNCIs).
- 9.14 LPDMP does not propose any further growth or development sites to that proposed through LPSS; which could adversely affect designated habitats and species. However, by addressing wider biodiversity enhancement goals in development management, LPDMP provides good opportunity to deliver real benefits for biodiversity. The draft Plan (biodiversity supporting text) recognises that the "*UK's biodiversity decline is so severe that heightened efforts to bring about recovery (as opposed to merely arresting loss) are essential*" and that biodiversity losses have been more acute within Surrey.
- 9.15 In response to these challenges, LPDMP proposes maximising biodiversity gains in new development. **Policy P6** (Biodiversity in new developments) will require development "*to prioritise biodiversity in their proposals as a general principle*", particularly when located within or adjacent to a Biodiversity Opportunity Area (BOA) where development should "*protect the designated and priority habitats and species in the BOA and improve habitat connectivity across the BOA.*" The policy seeks to imbed biodiversity principles in planting schemes and landscaping, features on building structures, and site design.

- 9.16 **Policy P7** (Biodiversity net gain) also seeks to ensure that development maximises contributions to net gain, with the requirement for “a *minimum gain of 20 per cent*”. Major developments are required to follow DEFRA’s net gain calculation methodology (Biodiversity Metric 2.0) and minor developments are required to follow a more simplified version of the metric. This is higher than the emerging government guidance<sup>18</sup> which requires a minimum 10% net gain, with the aims of addressing acute biodiversity losses, whilst minimising knock-on effects in terms of development viability. This measure to secure increased biodiversity enhancement is considered likely to lead to significant positive effects with regards to biodiversity.
- 9.17 Biodiversity protection is also enhanced through the policy provisions:
- **Policy P6** (Biodiversity in new developments) recognises the potential impacts (including recreational pressures and light pollution) arising from development containing or near to sensitive habitats and watercourses. The Policy seeks appropriate mitigation, including buffers and, where appropriate, barriers.
  - **Policy P8** (Woodland, trees, hedgerows and irreplaceable habitats) details the range of irreplaceable habitats, which includes ancient woodland, ancient wood pasture, ancient (or important) hedgerows, unimproved grassland and wet heathland and bogs. The Policy identifies that “*development resulting in the loss, damage or deterioration of irreplaceable habitats*” will largely be refused, and planning proposals are expected to “*set out clearly any likely impacts on irreplaceable habitats*”. Improved green linkages are also sought under the policy provisions, alongside the incorporation of trees within the public realm.
  - **Policy P9** (Priority species and habitats on undesignated sites) further enhances local biodiversity protections through the recognition and protection of additional features that contribute to ecological connectivity in the Borough, particularly in development sites adjacent/ near to priority habitats or species.
  - Quarries and chalk and sand pits are also recognised for their contribution to geodiversity. The designated Regionally Important Geological/ Geomorphological Sites (RIGS) are afforded greater protection through **Policy P14**, which requires that any development proposals that are likely to materially harm the conservation interests of RIGS “*must demonstrate that the need for the development clearly outweighs the impact on biodiversity.*”

## Appraisal of the Draft LPDMP

- 9.18 Draft LPDMP provides additional protections for biodiversity and seeks to take a proactive approach, which should support key sites and ecological connectivity and combat acute biodiversity losses across Surrey. Of particular note is the ambitious approach proposed in respect of required biodiversity net gain. Overall **significant positive effects** are anticipated.

## Climate change adaptation

- 9.19 Sustainability objective:
- Build resilience and adapt to the impacts of climate change and extreme weather events such as flood, drought and heat risks particularly on groups more vulnerable to the effects of climate change

## Commentary on draft policies

- 9.20 It is recognised that climate change mitigation alone will not be enough to address the issues of climate change. Weather patterns and the climate are changing and will continue to do so for the foreseeable future, making it important for new (and existing) development to consider ‘lifetime’ buildings which are suited to current and future climate conditions, and conducive to overall health and wellbeing. Anticipated impacts include hotter and drier summers, warmer and wetter winters, and an increase in heavy rain, storm events and flooding.

---

<sup>18</sup> Defra (2019) Net gain Summary of responses and government response July 2019 [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/819823/net-gain-consult-sum-resp.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf)

- 9.21 The draft Plan recognises (in supporting text) that modular buildings and offsite construction methods operating under factory conditions, are less wasteful and are typically able to deliver buildings that are much more energy efficient than traditional builds. *“Construction is quicker, safer, less affected by weather has less reliance on traditional skills which are in short supply, and the end product is generally of a higher and more consistent quality, bringing benefits to both the builder and the customer.”* The benefits of both passive heating and passive cooling in design are also recognised, as well as natural features and measures to address the urban heat island effect. The plan further identifies the benefits of permeable surfaces and features that store water or slow it down in both; reducing surface water flooding and helping developments become more resilient to the more severe rainfall events likely to result from climate change; and in returning water to ground sources reducing the impact of drier summers.
- 9.22 **Policy D2** (Climate Change, Sustainable Design, Construction and Energy) requires all development to be fit for purpose and remain so into the future by incorporating adaptations that avoid increased vulnerability and offer resilience to the full range of expected climate change impacts. It requires adaptation information to be provided in a Sustainability Statement for major development or within proportionate sustainability information for non-major development.
- 9.23 LPDMP seeks to enhance policy measures to combat adaptation and resilience. **Policy D12** (Sustainable and Low Impact Development) which *“expects developments to consider the lifecycle of buildings and public spaces, including how they can be adapted and modified to meet changing social and economic needs and how materials can be reused or recycled at the end of their lifetime.”*
- 9.24 **Policy D13** (Climate Change Adaptation) seeks to *“deliver climate change resilient development”*. The policy requires buildings are designed and constructed providing for the *“comfort, health, and wellbeing of current and future occupiers over the lifetime of the development, covering the full range of expected climate impacts and with particular regard to overheating. Developments likely to accommodate vulnerable people, such as schools and care homes, should demonstrate that their specific vulnerabilities have been taken into account with a focus on overheating.”* Further to this, *“buildings are required to incorporate passive cooling measures and the exclusion of conventional air conditional air conditioning wherever possible in line with the cooling hierarchy.”* Schemes are also required to *“minimise the urban heat island effect”* and *“demonstrate adaptation for more frequent and severe rainfall events.”* The provisions seek to maximise climate change resilience with good potential for minor long-term positive effects.

### Appraisal of the Draft LPDMP

- 9.25 The draft Plan seek to minimise the effects of overheating and increase resilience to the impacts of a changing climate, particularly for vulnerable groups. The drafted policy provisions are considered likely to lead to **minor positive effects**.

## Climate change mitigation

- 9.26 Sustainability objective:
- Mitigate the causes of climate change through reducing emissions of greenhouse gases and efficient use of natural resources

### Commentary on draft policies

- 9.27 Reducing greenhouse gas emissions is key to limiting the impacts of climate change, and action will need to take place at a range of levels; global, national and local. At a local level, the local plan can ensure that new developments are designed to produce fewer GHG emissions and can also enable retrofit improvements to existing developments to reduce their emissions. The Local Plan can further support reduced emissions by locating new development in areas which minimises the need to travel and maximises access to sustainable modes of transport, and by identifying opportunities for renewable energy generation and more efficient energy use, such as that associated with District Heating Networks.

- 9.28 The proposed Future Homes standard may deliver either a 20 per cent or, the government's favoured option, a 30 per cent improvement to building regulations carbon emissions standards for new homes. If this improvement is delivered nationally, it may be the case that a local standard is not necessary. Alongside these changes, the government is considering amending the Planning and Energy Act 2008 so that it no longer grants powers to Local Planning Authorities to set energy efficiency standards for homes, which will affect what can be achieved through local planning policy. At this stage, the Council's preferred approach is to not propose a policy and instead await the outcome of the government's consultation.
- 9.29 **Policy D2** requires the submission of a sustainability statement for major development and sustainability information for non-major development. Both must include information about how materials will be used efficiently and how waste will be avoided. The Policy requires development to follow the energy hierarchy and requires new buildings to achieve a carbon dioxide emissions standard that is 20 per cent lower than the relevant building regulations standard through improvements to the energy performance of the building (low energy design and efficient fabric) and the provision of low carbon and renewable energy technologies. The policy also provides support and encouragement for further development of both combined cooling heating and power (CCHP) and combined heating and power (CHP), in particular, due consideration of such schemes is required within 'Heat Priority Areas' (as defined on the Policies Map). The policy requires that where these exist already, development must "*connect to them or be connection-ready*".
- 9.30 The 2018 SA Addendum Report concluded in relation to LPSS that "*the plan leads to a reasonably strong likelihood of reduced average per capita CO2 emissions from the built environment, given a focus on strategic scale schemes and the policy requirements set to be put in place*".
- 9.31 **Policy D12** (Sustainable and Low Impact Development) seeks to expand on the energy hierarchy consideration by introducing "*an explicit requirement for schemes to follow a low energy design and energy efficient fabric approach to ensure that schemes maximise energy reductions before low carbon and renewable energy technology is considered, in line with the energy hierarchy*". It also seeks to minimise embodied carbon in construction and at the end of the lifecycle. The measures promote energy efficiency and a fabric first approach which is considered likely to support minor long-term positive effects in relation to climate change mitigation.
- 9.32 Alongside these measures, **Policy D15** (Large Scale Renewable and Low Carbon Energy) also identifies the intention to allocate one or more sites for renewable and low carbon energy development "*in appropriate locations where visual and other impacts will be minimised and where energy potential is good*." This will significantly support the identification and delivery of medium to larger-scale renewable energy schemes, which may currently be risk-adverse given the extent of Green Belt coverage in the Plan area. As a result, significant positive effects are anticipated.
- 9.33 With regards to parking standards (**Policy ID11**), there is potentially a degree of tension associated with the proposed approach, which involves setting of minimum parking standards for residential developments outside of the town centre; however, there is much uncertainty, as discussed in Section 6 of this report.
- 9.34 Finally, in respect of housing density (**Policy H4**), implications of a flexible criteria-based policy for transport-related greenhouse gas emissions are discussed in Section 6, with the conclusion reached that the proposed policy approach gives rise to a degree of concern, in that the relationship between density and 'sustainable transport' connectivity might potentially be most affectively addressed through a prescriptive approach deriving from a strategic process of evidence gathering an analysis. These concerns are uncertain, given good potential to take account of climate change mitigation and wide-ranging further considerations through the development management process; however, it is **recommended** that further work is undertaken to understand the strategic constraints and opportunities that exist.

### Appraisal of the Draft LPDMP

- 9.35 The additional policy provisions of LPDMP are supportive of energy efficiency and also of note are policy criteria for identifying suitable locations for medium to large-scale renewable energy development. However, there is considerable uncertainty at the current time following the recent Government consultation on options in respect of requiring that all new development meets a Future Homes Standard. There is also some uncertainty at the current time regarding the merits of the proposed approach to housing density (i.e. a flexible criteria-based approach) and residential parking standards (i.e. minimum standards outside of the town centre). As such, it is appropriate to conclude **uncertain effects** at the current stage.



## Digital infrastructure

9.36 Sustainability objective:

- Ensure that the digital infrastructure available meets the needs of current and future generations

### Commentary on draft policies

9.37 The National Design Guide<sup>19</sup> (2019) echoes established good practice on development for climate change. It recognises that

*“New construction techniques may contribute towards efficiency, productivity and the quality of new homes and buildings. These include the off-site manufacture of buildings and components using innovative and smart technologies supported by digital infrastructure”.*

9.38 It also recognises that *“well-designed places also have high-speed digital connectivity in order to provide options and information for education, health, leisure, social interaction, businesses and home working.”*

9.39 LPSS promotes the creation of ‘smart places’ through policy D1 (Place Shaping) where design “seeks to achieve high-quality digital connectivity” and “supports technological and digital advances, including the provision of sufficient ducting space for future digital connectivity infrastructure”. Fibre To The Premises (FTTP) is encouraged where practical, alongside mobile connectivity within the development and access to services from a range of providers.

9.40 LPSS identifies that *“the provision and uptake of reliable and high speed broadband has been a major issue reported by rural businesses in certain parts of the Borough”*, and in this respect the intrinsic links between digital infrastructure and the rural economy are recognised. It is also recognised that extending superfast broadband is one of the priorities set out in the Corporate Strategy. In response to these challenges **Policy E5** (Rural Economy) identifies that the Council will work with partners *“to support and improve the provision of internet services where needed in rural areas and enhance digital inclusion in such areas.”* The Policy recognises that *“this will help to retain and promote services and types of business, including traditional agriculture, and help to create more sustainable villages.”*

9.41 LPDMP does not propose any further thematic policy directly relating to digital infrastructure.

### Appraisal of the Draft LPDMP

9.42 The provisions of LPSS largely support positive effects in relation to digital infrastructure and no further direct effects are identified through LPDMP, which does not provide any further thematic policy in this respect. As a result overall **neutral effects** are anticipated.

## Economy

9.43 Sustainability objective:

- Maintain Guildford borough and Guildford town’s competitive economic role

### Commentary on draft policies

9.44 The Corporate Plan<sup>20</sup> (2018-2023) states that the Borough’s economy continues to perform well, being one of the strongest and most vibrant outside London, but there are signs that competitiveness could be lost to other locations. The main priority identified through this Plan is to encourage economic growth through knowledge, innovation and creativity. Support is also provided for the Enterprise M3 Local Enterprise Partnership (LEP) and its wider objectives to ensure that the local economy remains innovative, well-balanced and socially, environmentally and commercially sustainable.

<sup>19</sup> MHCLG (2019) National Design Guide [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/843468/National\\_Design\\_Guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf)

<sup>20</sup> Guildford Borough Council (2018) Corporate Plan 2018 – 2023 [online] available at: <https://www.guildford.gov.uk/article/17282/Corporate-Plan-2018-2023>

- 9.45 Guildford town centre is a highly successful destination for shopping with LPSS recognising that *“the centre has also proven to be one of the most economically resilient in the country in times of economic downturn, primarily due to its largely affluent population and attractive environment.”* LPSS identifies opportunities for the town centre as potentially including; *“a focus on leisure and other town centre uses that encourage people to visit, reducing the dominance of traffic congestion and surface car parks, and enhancements to the riverside, buildings and public spaces between them.”* The role of the Guildford Town Centre Regeneration Strategy<sup>21</sup> in delivering improvement opportunities is also recognised and supported. The Regeneration Strategy provides seven key ambitions, which includes (but is not limited to); a new community riverside park, new pedestrian and cycle routes, housing sites balanced with other more traditional town centre uses, and protection and enhancement of the townscape and character.
- 9.46 As identified under the employment land SA theme, economic development is largely directed under LPSS which allocates land for future economic growth across the borough and seeks to maintain and enhance the role of service and retail centres. The delivery of economic development is largely guided through LPSS Policy S2 (Planning for the Borough – our spatial development strategy) and thematic policies E1 to E9, and it is identified (in supporting text) that *“the preference is to locate new retail proposals on town centre sites, to make most effective use of these sites and ensure the town centre’s continued economic performance and vitality in line with the NPPF.”* The provisions within these policies for Surrey Research Park and the rural economy seek to promote not only growth in key sectors, but also economic diversity that contributes to varying needs across the Borough.
- 9.47 LPDMP seeks to provide additional policy guidance for rural and horse-related development. **Policy E10** (Rural Development (including agricultural diversification)) seeks to clarify the types of new buildings or changes of use of buildings and land that the Council would consider acceptable in principle. Within the Green Belt this includes small-scale sports and recreational facilities as well as conversion of redundant agricultural buildings for small-scale businesses or recreational uses. Within the countryside (outside of the Green Belt) a broader range of uses are identified as potentially acceptable, including farm shops, farm diversification proposals, tourist accommodation, small-scale rural tourism attractions, small-scale leisure facilities and horticultural nurseries and other small-scale business enterprises. The policy supports a range of appropriate activities which are likely to support rural economies, and minor long-term positive effects are anticipated in this respect.
- 9.48 **Policy E11** (Horse-related Development) seeks to support horse or other equine-related development where appropriate, and to ensure appropriate consideration is given to rural locations, a transport assessment is required under this policy for any such development of a large-scale; ensuring the vitality of the rural economy in the long-term.
- 9.49 The provisions of **Policy D4** (Achieving High-Quality Design and Local Distinctiveness) will also support economic performance by retaining and enhancing the character and quality of key town and service centres to maintain and increase their attraction and offer. The provisions of **Policy D11** (Corridor of the River Wey and Guildford and Godalming Navigation) also support the aims of the Guildford Town Centre Regeneration Strategy; specifically seeking *“publicly accessible riverside walkways and/ or cycle routes to enhance the vitality of the riverside”* and minor long-term positive effects are anticipated in this respect.

### Appraisal of the Draft LPDMP

- 9.50 The additional rural development policies proposed in LPDMP support a range of appropriate land uses and types of rural business activity to maintain economic vitality in these areas. Additional policy provisions relating to design should also support town centre regeneration aims. Overall **minor positive effects** are anticipated.

<sup>21</sup> Guildford Borough Council (2017) Guildford Town Centre Regeneration Strategy 2017 [online] available at: <https://www.guildford.gov.uk/article/20314/Town-Centre-Regeneration-Strategy>

## Education

9.51 Sustainability objective:

- Improve levels of education and skills in the population overall

### Commentary on draft policies

- 9.52 It is noted in the baseline that the number of school places across Guildford as a whole is tight and, following the peak of births seen in 2012, a number of school expansions have taken place. The vacant places that exist tend to be concentrated in schools in some of the rural areas, with a shortage of primary places in the Guildford Town area. Pressure on places is also anticipated to increase with the introduction of new housing.
- 9.53 The 2017 study Closing the Gap: Trends in Educational Attainment and Disadvantage<sup>22</sup> finds that, while there has been some progress in closing the attainment gap it is still the case that persistently disadvantaged pupils end primary school over a year behind their non-disadvantaged peers and are over two years behind by the end of secondary school.
- 9.54 LPSS provides some context in relation to this SA theme. In particular, Policy H1 (Homes for all) directs the majority of student accommodation to purpose built locations, and predominantly on campus. The role of education as a key economic sector (including in rural economies) and business cluster in the Borough is also recognised. The site allocations at Gosden Hill Farm (Policy A25), Blackwell Farm (Policy A26), the former Wisley Airfield site (Policy A35) each seek to deliver new facilities for both primary and secondary education, and contributions to the expansion of Ash Manor Secondary School are also required at the 'land to the south and east of Ash and Tongham (Policy A31).
- 9.55 LPDMP supports these provisions with **Policy ID8** (Community Facilities) which captures educational provisions as key community facilities and supports the appropriate replacement or expansion of them, as well as restricting their loss. The policy also seeks to conveniently locate new facilities to maximise accessibility. This is likely to support educational development and access to education in the long-term, with the potential for minor positive effects.

### Appraisal of the Draft LPDMP

- 9.56 The additional policy provisions of Policy ID8 seek to protect existing educational facilities and support their appropriate replacement or expansion. The policy also ensures that new educational facilities will be located to maximise accessibility. Overall **minor long-term positive effects** are anticipated.

## Employment land

9.57 Sustainability objective:

- Facilitate appropriate development opportunities to meet the changing needs of the economy

### Commentary on draft policies

- 9.58 The SA objective relating to employment land is predominantly affected by the proposed growth strategy of LPSS which provides for at least 36,100 – 43,700 sq m of office and research and development (B1a and b) floorspace (net); 3.7– 4.1 hectares of industrial (B1c, B2 and B8) land (gross); and approximately 41,000 sq m of comparison retail floorspace (gross) under Policy S2 (Planning for the borough – our spatial development strategy) across a number of sites.

<sup>22</sup> Andrews, J., Robinson D., Hutchinson J. Closing the Gap? Trends in Educational Attainment and Disadvantage, August 2017, PP.54, Education Policy Institute. Available at: [https://epi.org.uk/wp-content/uploads/2017/08/Closing-the-Gap\\_EPI-.pdf](https://epi.org.uk/wp-content/uploads/2017/08/Closing-the-Gap_EPI-.pdf)

- 9.59 Additional proposed policies within LPDMP relating to economic development include **Policy E10** (Rural Development (including agricultural diversification)) and **Policy E11** (Horse-related Development). Policy E10 (Rural Development (including agricultural diversification)) seeks to clarify the types of new buildings or changes of use of buildings and land that the Council would support in principle and facilitate rural development in this respect. Uses supported in principle are identified for both locations within the Green Belt and in the countryside, which in both types of location, may include farm diversification proposals. Whilst the policies do not directly allocate land for such uses, the policies support the facilitation of rural development and minor long-term positive effects are anticipated in this respect.

### Appraisal of the Draft LPDMP

- 9.60 Whilst the proposed policies of LPDMP do not directly allocate land for new employment development, the additional provisions of Policies E10 and E11 should help to ensure that targeted new employment land comes forward in the rural area to meet specific needs. Overall **minor positive effects** are anticipated.

## Flood risk

- 9.61 Sustainability objective:

- Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment

### Commentary on draft policies

- 9.62 Whilst flood risk remains a constraint to development in the Borough, LPDMP does not propose further growth or development that could affect or be affected by flood risk. On this basis, no significant effects are anticipated in relation to this SA objective.
- 9.63 Policy protections in relation to flood risk are largely provided through LPSS, which includes Policy P4 (Flooding, flood risk and groundwater protection zones). The policy provisions require sequential and exception testing in line with NPPF requirements, as well as site-specific flood risk assessment when development is proposed within an area of medium or high risk flooding. Under this policy development is required to consider both flood protection and flood resilience and resistance measures. Proposals within the 'developed' flood zone 3b are restricted in terms of expansion and required to facilitate greater floodwater storage, whilst the 'undeveloped' areas of flood zone 3b is largely safeguarded for flood management purposes.
- 9.64 LPDMP proposes additional policy provisions for the management of surface water, which can contribute to minimising flood risk, particularly in extreme weather events. **Policy P13** (Sustainable Drainage Systems) requires all development proposals "to demonstrate that SuDS have been included from the early stages of site design", further to this "SuDS schemes will be required to satisfy technical standards and design requirements in accordance with Defra's technical standards for sustainable drainage systems". This is echoed through **Policy D13** (Climate Change Adaptation) which requires schemes to "demonstrate adaptation for more frequent and severe rainfall events" through measures which include SuDS and planting and landscaping schemes which maximise absorption and slow down surface water. The additional protection in relation to surface water is considered likely to lead to long-term minor positive effects in relation to flood risk.
- 9.65 Finally, there is potential a tension with **Policy ID11**, which deals with parking standards, in that minimum residential standards are required for residential developments outside of the town centre, potentially leading to increased impermeable hard standing and in turn surface water runoff; however, effects are likely to be quite marginal.

### Appraisal of the Draft LPDMP

- 9.66 The additional policy provisions relating to the management of surface water should contribute to minimising flood risk, particularly in extreme weather events. A tension is highlighted in respect of the proposal to support minimum parking standards, but flood risk impacts are likely to be marginal. Overall **minor positive effects** are anticipated.

## Health

### 9.67 Sustainability objective:

- Facilitate improved health and well-being of the population, enabling people to stay independent and reducing inequalities in health

### Commentary on draft policies

- 9.68 Planning for housing and employment development alongside infrastructure and service development provides the opportunity to actively promote social health and wellbeing.
- 9.69 It is recognised that the location of development, as determined through LPSS, bears much influence in terms of; access to healthcare, minimising exposure to key health risks (including poor air quality), reducing inequalities and providing for active and healthy lifestyle choices.
- 9.70 The 2018 SA Addendum Report concluded in relation to LPSS that *“the plan should support good health amongst residents, primarily through supporting walking, cycling and access to open space, and ensuring good access to health services; however, there is some uncertainty given much relies on timely infrastructure delivery. Certain allocations in the Guildford urban area, and more generally plans for a Sustainable Movement Corridor, are positive from a health perspective”*. Significant positive effects were predicted overall, though with some uncertainty.
- 9.71 However, LPDMP broadens policy protections for key facilities that are conducive to health and wellbeing, including open space, community, health and sports facilities. **Policy ID5** aims to provide additional detail and clarity in relation to protecting open space, following on from LPSS Policy ID4 – Green and Blue Infrastructure. The Policy provides protection for existing spaces and identifies that where provision of open space exceeds minimum standards it will not be considered ‘surplus’.
- 9.72 **Policy ID6** (Open Space in New Developments) further sets out open space standards for new residential development in the Borough, with provision requirements increasing as the size of the development increases. The Policy identifies that the strategic LPSS sites are expected to provide for all types of open space (amenity/ natural green space, parks & recreation grounds, children’s play space, youth play space, and allotments). This is supported by quantity and access standards for each typology. The policy clearly identifies the anticipated contributions in the future growth of the Borough and is likely to support minor long-term positive effects for health and wellbeing, not only by providing new space in line with minimum space standards, but also by ensuring that such spaces are with reasonable walking distances. Further to this, Policy ID6 also requires new open spaces *“to be multi-functional spaces that deliver a range of benefits, including biodiversity gains, flood risk improvements, climate change measures and social inclusivity”* and *“support and enhance the existing rights of way network, providing new footpaths and cycle links where possible”* all to the benefit of resident health and wellbeing.
- 9.73 **Policy ID7** (Sport, Recreation and Leisure Facilities) seeks to support development *“that provides, increases or improves opportunities for public sport, recreation and leisure”* and seeks to maximise active travel opportunities to and from such locations. This should provide additional support for healthy lifestyle choices in relation to exercise and physical activity. Community facilities are viewed as integral to promoting healthy, inclusive and safe communities and the support for the retention and enhancement of community facilities provided through **Policy ID8** (Community Facilities) will be beneficial in this respect.
- 9.74 As noted in relation to key services and facilities, the development of active travel networks will also support communities with healthy travel choices, and **Policy ID10** (Achieving a Comprehensive Guildford Borough Cycle Network) aims to *“achieve a comprehensive Guildford Borough cycle network”*. The Policies Map identifies specific routes where the Council will undertake or promote measures to encourage cycling *“including improvements to the safety and convenience of the routes, the designation of cycle tracks, the designation of cycle lanes, and the signposting and the provision of cycle parking facilities”*, and the policy requires consideration of this in all new developments.
- 9.75 **Policy P11** (Air Quality and Air Quality Management Areas) seek to manage and reduce the impacts of poor air quality on resident health. The policy seeks to *“reduce exposure to poor air quality across the borough and improve levels of air pollutants in Air Quality Management Areas”* and *“will only permit development where it will not give rise to adverse impacts on health and quality of life from air pollution.”*

- 9.76 In general, LPDMP also embeds health throughout the policy framework, occurring as a key consideration under most broad themes, including within; ‘protecting’ policies such as for biodiversity, water resources and water quality, soil resources; ‘design’ policies including as part of sustainable and low impact development and in the context of climate change; and ‘infrastructure and delivery’ policies which span community facilities, open space and travel networks. This embedded policy coverage is considered for its long-term positive effects.
- 9.77 Finally, with regards to parking standards (**Policy ID11**), there is potentially a degree of tension associated with the proposed approach, which involves setting of minimum parking standards for residential developments outside of the town centre; however, there is much uncertainty, as discussed in Section 6.

### Appraisal of the Draft LPDMP

- 9.78 The draft Plan is recognised for a number of positive impacts in relation to health. Additional policy protections are afforded to key facilities that are conducive to health and wellbeing, including open space, and community, health and sports facilities. Further policy provisions also seek to enhance active travel networks and reduce the impacts of poor air quality on health. This is considered alongside the general approach of embedding health as a key consideration across the policy framework and broad range of policy themes. The proposed policy approach to residential parking standards (minimum standards outside of the town centre) potentially leads to a degree of tension, but this is highly uncertain. Overall **significant positive effects** are anticipated.

## Historic environment

- 9.79 Sustainability objective:
- Protect, enhance, and where appropriate make accessible, the archaeological land historic environments and cultural assets of Guildford, for the benefit of residents and visitors

### Commentary on draft policies

- 9.80 The Borough contains a wealth of designated and undesignated assets which contribute to character, sense of place, attractiveness and quality of life. There are over 1,000 Listed Buildings in the Borough as well as over 200 Locally Listed Buildings; many of which form part of one of the 40 Conservation Areas dispersed across the Borough. The Borough further contains 52 Historic Parks and Gardens and 31 Scheduled Monuments, alongside many areas identified as areas of high archaeological potential.
- 9.81 As LPDMP does not propose any further growth sites, there is limited potential for negative effects on designated and non-designated assets, or their settings. However, the draft Plan does propose additional policy protections, which are likely to bring about benefits in relation to the historic environment.
- 9.82 The SA Report for LPSS concludes that site-specific policy mitigation, alongside thematic policy for Guildford Town Centre and that addressing the visitor/ leisure experience largely ensures no significant direct impacts upon the historic environment. **Policy D3** (Historic Environment) identifies that “*the historic environment will be conserved and enhanced in a manner appropriate to its significance*”, expecting “*development of the highest design quality that will sustain and, where appropriate, enhance the special interest, character and significance of the borough’s heritage assets and their settings and make a positive contribution to local character and distinctiveness*”. LPDMP builds on thematic policy with proposed Policies D16 to D20 directly relating to the historic environment, and offering greater protection for designated and non-designated assets, their settings, and archaeology as well as enhanced opportunities to seek positive enhancements in new development.
- 9.83 **Policy D16** sets out “*a positive strategy for the conservation and enhancement of all designated heritage assets*” which includes the requirement for all development proposals affecting designated heritage assets or their settings, “*to be supported by a Statement of Significance and Impact*” proportionate to the assets’ importance. The policy seeks to restrict development that could result in loss of significance, and support enabling development that secures the future conservation of a heritage asset.

- 9.84 **Policy D17** (Listed Buildings) further provides detail for development proposals affecting Listed Buildings, including requirements for any alterations, additional or other works, directly, indirectly or cumulatively affecting the special interest of a Listed Building, and measures to address both climate change adaptation and mitigation in the fabric of such buildings. The detailed policy guidance is not overly-prescriptive, but rather sets out the parameters of what is generally acceptable and what is not, and how any relevant decision-making will be weighted. As a result, minor long-term positive effects are anticipated.
- 9.85 Conservation Areas are afforded greater protections through the provisions of **Policy D18** (Conservation Areas) which seeks to preserve and enhance character and local distinctiveness, ensuring due regard is given to Conservation Area Appraisals, key views and the use of appropriate materials in such areas to maximise the potential for positive contributions in new development. Similarly, **Policy D19** (Scheduled Monuments & Registered Parks and Gardens) seeks to add more operational detail in relation to key designated assets, resisting their loss or development which is detrimental to their significance, and inclusive of the requirement for archaeological evaluation/ assessment where appropriate. **Policy D20** (Non-Designated Heritage Assets) seeks to protect non-designated features “*so that they continue to contribute to the richness of the historic environment*”. The enhanced policy protections and provisions afforded through LPDMP, particularly those for non-designated assets, are considered likely to support the delivery of minor long-term positive effects in relation to the historic environment.

### Appraisal of the Draft LPDMP

- 9.86 LPDMP builds on the thematic policy of LPSS to provide greater policy protections for designated and non-designated assets, and their settings, as well as archaeological remains. The policy provisions further seek to identify opportunities to deliver positive enhancements. Overall **minor positive effects** are anticipated.

## Housing

- 9.87 Sustainability objective:
- Meet housing requirements of the whole community and provide housing of a suitable mix and type

### Commentary on draft policies

- 9.88 The SA objective relating to housing is predominantly affected by the proposed growth strategy of LPSS which, under Policy S2 (Planning for the borough – our spatial development strategy), provides for 562 dwellings per annum over the plan period (2015 – 2034) equating to 10,678 new homes in total.
- 9.89 The provisions of LPSS meet the overall identified housing needs for the borough, and Policy H1 (Homes for all) requires all new residential development “*to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment*” and “*provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location.*” The policy identifies criteria in relation to a broad range of homes; including accessible homes, specialist accommodation, student accommodation, Gypsy, Traveller and Travelling Showpeople pitches and plots, houses in multiple occupation, and self-build and custom housing. This is supported by LPSS Policy H2 (Affordable Homes) which sets out significant requirements for the provision of affordable housing as well as the Council intentions to support increased affordable housing stock, including on public sector-owned land. LPSS Policy H3 (Rural Exception Homes) further supports the delivery of affordable housing at small-scale development locations within the Green Belt.
- 9.90 Provisions of LPSS largely address the SA objective in meeting housing needs and providing a mix of types and tenures. However, LPDMP proposes two further policies which are likely to bring about benefits in relation to housing. **Policy H4** (Housing Density) seeks to maximise densities in the most accessible locations, supporting high levels of accessibility and a reduced need to travel in new developments, and minimising deprivation in this respect. Densities are also required to consider the context and local character of the area, to support the delivery of high-quality housing that is in-keeping in local context and supportive of inclusiveness and identity. **Policy H5** (Housing Extensions and Alterations) also delivers more detailed criteria in relation to housing extensions and alterations to ensure that development is high-quality in design and respectful of its context, and does not impact upon amenity. **Policy H6** (Housing Conversion and Sub-Division) seeks to manage the impacts of housing conversions and sub-divisions on the balance of housing stock. The additional policy provisions support high-quality housing, addressing identified needs in accessible locations and are likely to deliver minor long-term positive effects in relation to this SA objective as a result.

## Appraisal of the Draft LPDMP

- 9.91 The two additional policies proposed in relation to housing are considered should support high-quality development, and maximise the delivery of housing in the most accessible locations of the Borough. Overall **minor positive effects** are anticipated.

## Land

- 9.92 Sustainability objective:

- Minimise the use of best and most versatile agricultural land and encourage the remediation of contaminated land

### Commentary on draft policies

- 9.93 High-quality agricultural land is a finite resource and LPSS Policy E5 (Rural Economy) identifies that “*agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account.*” However, the SA Report for LPSS still anticipated overall significant negative effects arising from the losses incurred in the site allocations of the Plan. Agricultural resources are unlikely to be further affected in the implementation of LPDMP, which does not seek any additional growth but rather sets a policy framework for the future development of the Borough as established by LPSS. LPDMP does not include any further direct references to agricultural land and as such, it is considered likely to have neutral effects in relation to agricultural land resources.
- 9.94 However, LPDMP does provide direct support for the remediation of despoiled, contaminated or unstable land, with **Policy P10** (Contaminated Land) requiring suitable assessment and remediation where appropriate, and ensuring development avoids “*creating or maintaining linkages between sources of contamination and sensitive receptors.*” As a result, minor long-term positive effects are anticipated in relation to the SA objective.
- 9.95 Finally, there is potentially a tension with **Policy ID11**, which deals with parking standards, in that minimum residential standards are required for residential developments outside of the town centre, potentially leading to more land-take for parking; however, effects are likely to be quite marginal.

## Appraisal of the Draft LPDMP

- 9.96 Given that no further growth is proposed or further policy directly relating to agricultural land, neutral effects are anticipated in relation to agricultural land resources; and proposed policy provisions support the remediation of contaminated land. A tension is highlighted in respect of the proposal to support minimum parking standards, but effects in respect of ‘land’ objectives are likely to be marginal. Overall **minor positive effects** are anticipated.

## Landscape and townscape

- 9.97 Sustainability objective:

- Conserve and enhance the quality and local distinctiveness of landscapes and townscapes

### Commentary on draft policies

- 9.98 The Guildford Landscape Character Assessment<sup>23</sup> notes the varied and dynamic landscape of the Borough, evidenced by the presence of four different countryside character areas at the national level. The Surrey Hills Area of Outstanding Natural Beauty (AONB) lies within the borough and is a key landscape feature. The Area of Great Landscape Value (AGLV) is also a county-wide environmental designation. There are also 57 separate townscape character areas in Guildford, Ash and Tongham, for which the townscape character has been assessed to have varying strengths of character and condition. They range from historic towns and villages to 20th century industrial/ retail parks.

<sup>23</sup> Guildford Borough Council and Land Use Consultants (2007) Guildford Landscape Character Assessment [online] available at: <http://www.guildford.gov.uk/planningandbuildingcontrol/documentsandpublications>



- 9.99 LPSS provides much context in relation to key landscape designations, with Policy P1 dedicated to the conservation and enhancement of Surrey Hills AONB and AGLV. Policy P2 protects the Green Belt from inappropriate development, which will indirectly contribute to the retention of areas of open countryside that contribute to landscape character, tranquillity and scenic views. Policy P3 also restricts development in the countryside to that which is appropriate and proportionate and “*does not lead to greater physical or visual coalescence*” between settlement areas.
- 9.100 LPSS Policy D1 (Place Shaping) also identifies criteria relating to design and place-shaping, requiring all development to “*achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set.*” The policy creates links to the Design Guide SPD and requires development to consider further aspects such as; a network of green spaces and public spaces; access and inclusion; and infrastructure to create smart places. This will support the conservation and enhancement of the quality and local distinctiveness of townscapes, as well as people’s positive experiences of them.
- 9.101 The 2018 SA Report Addendum for LPSS identified an overall potential for significant positive effects in relation to landscape, concluding that: “*given the extent to which landscape has been applied as a constraint, and recognising that the baseline situation could be one whereby development will come forward in an unplanned way, it is appropriate to conclude significant positive effects*”
- 9.102 Whilst LPDMP does not propose any further policy provisions in relation to designated landscapes, it does seek to provide further detail and clarity in relation to; high-quality design including in village and town centres; the public realm; the riverside; and development in key historic townscape areas.
- 9.103 **Policy D4** (Achieving High-Quality Design and Local Distinctiveness) identifies three aims which directly relate to landscape/ townscape, to; deliver high-quality design across the Borough; protect the character and local distinctiveness of the Borough; and achieve new developments that contribute to and enhance existing character and create distinctive new environments. General principles for design standards are identified, which includes; having due regard to the 2019 National Design Guide; considering opportunities to create site specific identities; and comprehensive and integrated design that delivers well-connected development. Detailed criteria are also proposed in relation to the character of development which includes; consideration of local character and context in design; consideration of “*appropriate scale, height, massing, form, proportions and roof forms*”; high-quality materials and detailing that reflects and reinforces local identity; and protection of key views. Support for key views is also provided through **Policy D5** (Privacy and Amenity) which ensures lighting schemes consider glare and light spillage.
- 9.104 **Policy D6** (Shopfront Design) recognises the impact new or altered shopfronts can have on the appearance, character and vitality of an area and seeks to ensure that shopfronts “*are well designed*” with “*proportioned, and interesting facades*”. This is supported by **Policy D7** similarly outlining criteria relating to advertisements, hanging signs and illumination that seek to minimise impacts on townscapes, and in particular designated historic townscapes such as Conservation Areas.
- 9.105 **Policy D8** (Public Realm) provides detailed requirements for new public realm projects and public art to ensure high-quality townscape environments. The policy aims to ensure development considers distinctive local qualities, identity, and topography, and delivers high-quality design, views and focal points and enhanced access.
- 9.106 The active promotion of riverside development and improvements are also likely to support positive effects in relation to townscape. **Policy D11** (Corridor or the River Wey and Guildford and Godalming Navigation) seeks “*a high-quality of design, both sensitive to and appropriate to, the context and function, and the special historic interest, of the river, its navigation and landscape.*” The policy requires landscape improvements in new development and provision of new native planting schemes, and ensures that “*sensitive levels of lighting are used to retain existing character and to protect amenity, natural habitats and night sky.*”
- 9.107 LPDMP also provides further protection for the existing network of open spaces, and detailed standards for the provision of new open space in development through proposed **Policy ID5** (Protecting Open Space) and **Policy ID6** (Open Space in New Developments). Open spaces will often contribute to landscape and townscape, and more generally sense of place.
- 9.108 Finally, in respect of housing density (**Policy H4**), implications of a flexible criteria-based policy for transport-related greenhouse gas emissions are discussed in Section 6, with the conclusion reached that the proposed policy approach is supported from a landscape perspective given the particular context of Guildford Borough, e.g. in respect of topography.

## Appraisal of the Draft LPDMP

- 9.109 Whilst LPDMP does not propose any further policy provisions in relation to designated landscapes, it does seek to provide further detail and clarity in relation to: development density; high-quality design including in village and town centres; the public realm; the riverside; and development in key historic townscape areas; and protection of open spaces. Overall **significant positive effects** are anticipated.

## Poverty

- 9.110 Sustainability objective:

- Reduce poverty and social exclusion for all sectors of the community

### Commentary on draft policies

- 9.111 The Index of Multiple Deprivation (IMD) seeks to identify where local residents are deprived against measures in relation to income, employment, health, education, housing and crime. The IMD ranks Guildford 204 out of 326 local authorities, with 326 being the least deprived authority. This figure has climbed since 2010, reflecting reduced inequalities overall. However, it is recognised that isolated pockets of relative deprivation still exist across the Borough.
- 9.112 LPSS largely addresses this SA objective through the allocation and distribution of new housing, employment, transport, service, facility and infrastructure development. This includes under Policy H2 a significant proportion of affordable homes in new development of 11 or more dwellings (or 5 or more dwellings in rural areas).
- 9.113 However, the proposed LPDMP policies provide additional support in relation to fuel poverty. Fuel poverty is caused by a combination of high domestic energy consumption and poor energy affordability in low income households. In the Borough, 9.1% of households are in fuel poverty (around 5,100 households), the highest level in Surrey and slightly higher than the average for the South East. Fuel poverty presents a significant risk to human health and life, it is estimated to have contributed to 5,500 excess winter deaths in 2017/18 in England and Wales, and is particularly concentrated in households that rent privately.
- 9.114 Constructing buildings that are energy efficient and supplied by low or zero carbon energy technologies can reduce operational carbon emissions but can also improve energy security and reduce fuel poverty for householders. In this respect the provisions of **Policy D12** (Sustainable and Low Impact Development) seeks to expand on the energy hierarchy consideration by introducing “*an explicit requirement for schemes to follow a low energy design and energy efficient fabric approach to ensure that schemes maximise energy reductions before low carbon and renewable energy technology is considered, in line with the energy hierarchy*”. It also seeks to minimise embodied carbon in construction and at the end of the lifecycle. The measures promote energy efficiency and a fabric first approach are likely to support reduced levels of fuel poverty.

## Appraisal of the Draft LPDMP

- 9.115 Whilst the provisions of LPSS predominantly affect this SA objective, the proposed additional measures under Policy D12 for increased energy efficiency and a ‘fabric-first’ approach should support efforts to reduce levels of fuel poverty. Overall **minor positive effects** are anticipated.

## Previously developed land

- 9.116 Sustainability objective:

- Make the best use of previously developed land (PDL) and existing buildings

### Commentary on draft policies

- 9.117 As the growth strategy for the Borough is set through LPSS, and LPDMP does not propose further growth, no significant effects are predicted in relation to this SA objective. The supporting text of LPSS Policy S2 (Planning for the Borough – our spatial development plan) identifies that “*development will be directed to the most sustainable locations, making best use of previously developed land (including in the Green Belt if appropriate).*”

- 9.118 LPDMP does not propose further policy directly relating to this theme. However, minor indirect positive effects may be possible through the inclusion of LPDMP **Policy P10** (Contaminated Land) which by way of setting out the parameters for dealing with contaminated land, may reduce such associated risks with development of previously developed land.

### Appraisal of the Draft LPDMP

- 9.119 It is considered overall that this SA objective is predominantly affected by the provisions and allocations of LPSS. No direct effects in relation to PDL can be concluded in implementation of LPDMP, although the policy requirements for contaminated land are noted. **Neutral effects** are predicted overall.

## Rural economy

- 9.120 Sustainability objective:

- Enhance the borough's rural economy

### Commentary on draft policies

- 9.121 Guildford's attractive countryside, leisure opportunities, heritage and retail offer are crucial to attracting visitors to the borough, and the Rural Economic Strategy<sup>24</sup> identifies that approximately 25% of local jobs are located in Guildford's rural wards.
- 9.122 LPSS provides some context with Policy E5 relating directly to the rural economy. The policy identifies that *"the sustainable growth and expansion of all types of business and enterprise in rural areas will be supported"* (provided development is in accordance with the other policies of the plan) and that *"development and diversification of agricultural and other land-based rural businesses will be supported"*. The policy outlines the Council's aims to work with partners to *"support and improve the provisions of internet services where needed in rural areas and enhance digital inclusion in such areas."*
- 9.123 LPDMP seeks to provide additional policy guidance for rural and horse-related development. **Policy E10** (Rural Development (including agricultural diversification)) seeks to clarify the types of new buildings or changes of use of buildings and land that the Council would consider acceptable in principle. Within the Green Belt this includes small-scale sports and recreational facilities as well as conversion of redundant agricultural buildings for small-scale businesses or recreational uses. Within the countryside (outside of the Green Belt) a broader range of uses are identified as potentially acceptable, including farm shops and other farm diversification proposals, tourist accommodation, small-scale rural tourism attractions, small-scale leisure facilities and horticultural nurseries and other small-scale business enterprises. The policy supports a range of appropriate activities which are likely to support rural economies, and minor long-term positive effects are anticipated in this respect.
- 9.124 **Policy E11** (Horse-related Development) seeks to support horse or other equine-related development where appropriate, and to ensure appropriate consideration is given to rural locations, a transport assessment is required under this policy for any such development of a large-scale; ensuring the vitality of the rural economy in the long-term.
- 9.125 The provisions of **Policy D4** (Achieving High-Quality Design and Local Distinctiveness) will also support rural economic performance by retaining and enhancing the character and quality of settlements, including rural and historic areas, to maintain and increase their attraction and offer.

### Appraisal of the Draft LPDMP

- 9.126 The additional policy provisions seek to clarify the types of new buildings or changes of use of buildings and land in rural areas, which the Council would consider acceptable in principle. A range of uses are identified which provide support for the rural economy and economic vitality in these areas. Overall **minor positive effects** are anticipated.

<sup>24</sup> Guildford Borough Council (2017) Rural Economic Strategy 2017 – 2022 [online] available at: <https://www.guildford.gov.uk/ruraleconomy>

## Safe and secure communities

9.127 Sustainability objective:

- Create and maintain safer and more secure communities and improve the quality of where people live and work

### Commentary on draft policies

- 9.128 Guildford is one of the safest places to live, work and visit in the country, as Surrey has low levels of recorded crime. However, there is a disproportionate fear of crime and concerns about anti-social behaviour in certain parts of Guildford Town Centre. In addition, despite overall low crime rates, there are a small number of hotspots with crime levels amongst the highest in the county. The Safer Guildford Partnership aims to help residents feel safe and be safe in Guildford, by focusing on reducing priority issues of crime and anti-social behaviour in hotspot locations.
- 9.129 Context in relation to safe and secure communities is provided by LPSS Policy D1 (Place shaping) which seeks to achieve high-quality design that supports safety and natural security with attractive spaces, good enclosure, overlooked streets, and clear interrelationships between land uses and external spaces. The policy expects *“all new development will be designed to ensure it connects appropriately to existing street patterns and creates safe and accessible spaces”*. Further to this, the policy outlines the expectation that *“all new development will be designed to reduce opportunities for crime and antisocial behaviour”*. The policy directly seeks to create and maintain safer and more secure communities, addressing the identified SA objective in large part.
- 9.130 LPDMP provides minor additional support for this SA objective in relation to improving the quality of where people live and work, with a number of additional design policies proposed, including in relation to the public realm. **Policy D4** (Achieving High-Quality Design and Local Distinctiveness) seeks to deliver high-quality design which protects the character and local distinctiveness. The policy expects development to *“be inclusive, integrated and accessible for all occupants now and in the future”* and *“promote safer streets and public areas and pedestrian friendly spaces.”* Public realm development is required under **Policy D8** (Public Realm) to be *“robust and user friendly for all, and create varied and attractive environments and spaces where people want to be, and to contribute to”*. The policy provisions are considered for their potential to support long-term minor positive effects.
- 9.131 Proposed Policy D10 (‘Agent of Change’ and Noise Impacts) further seeks to ensure that new development successfully integrates with existing businesses, community facilities and ‘noise-sensitive’ uses such as residential uses. Proposed Policy D10 would require, where appropriate, Noise Impact Assessment to *“clearly identify the likely effect levels from, or on, existing uses nearby to the proposed development as a result of the proposal, including the potential adverse effect that they may have on the new existing residents or users.”* The policy provides clear mitigation requirements that will ensure that no significant effects arise in relation to the impact of noise on communities.

### Appraisal of the Draft LPDMP

- 9.132 Proposed policy provisions are supportive of improving the quality of local environments and hence should indirectly lead to benefits in respect of in maintaining safer and more secure communities. Overall **minor positive effects** are anticipated.

## Transport

9.133 Sustainability objective:

- Encourage the use of sustainable forms of transport (walking, cycling, bus, rail)

### Commentary on draft policies

- 9.134 It is considered that this SA objective is largely influenced by the directions and policy provisions of LPSS, which distributes the overall level of growth across the Borough and contains more policies directly relating to this theme. The Local Plan also sits alongside Surrey County Council’s Local Transport Plan (LTP) as a key planning document for transport and infrastructure development.

- 9.135 In the context of these documents an emphasis on improved sustainable transport connections is provided. The delivery of two new rail stations and a 'Sustainable Movement Corridor' as proposed through LPSS will deliver significant transport improvements and encourage the use of more sustainable modes, including active travel. These provisions sit alongside the growth strategy of LPSS which seeks to maximise sustainable transport access and (through an effective spatial strategy) reduce the need to travel.
- 9.136 LPSS SA Addendum concluded that *“whilst transport/ traffic constraints are widespread across Guildford Borough, it is apparent that the spatial strategy has been developed in order to reflect variations in constraint and opportunity, most notably through focusing growth at locations along a Sustainable Movement Corridor in the urban area of Guildford, and at locations in proximity to a rail station.”* No significant effects were predicted.
- 9.137 Whilst LPDMP does not propose additional growth, it does propose additional policy provisions which are likely to benefit transport infrastructure and accessibility. **Policy ID10** (cycle network) seeks to *“achieve a comprehensive Guildford Borough cycle network”* as mapped through the Policies Map which identifies specific routes along which improvement measures will be implemented. This includes improvements to the safety and convenience of the routes, the designation of cycle tracks, the designation of cycle lanes, and the signposting and provision of cycle parking facilities. The measures seek to support the uptake of more sustainable modes of travel and are likely to lead to positive effects accordingly.
- 9.138 **Policy ID11** (Parking Standards) seeks to identify maximum parking standards in the town centre and minimum standards across the rest of the Borough, as well as standards for non-residential development; which is likely to support the Council aims of minimising negative effects associated with localised traffic congestion within and surrounding development sites. This is supported by **Policy H4** (Housing Density) which directly seeks to maximise densities in the most accessible locations, supporting high levels of accessibility and a reduced need to travel in new developments. See further discussion in Section 6.

### Appraisal of Draft LPDMP

- 9.139 The proposed LPDMP policy provisions are likely to deliver additional benefits in relation to transport. This includes the identification and promotion of a comprehensive and connected cycle network for the Borough and policy measures which seek both directly and indirectly to maximise densities in the most accessible location of the Borough (the town centre). The measures seek to support the use of sustainable modes of transport and as a result **minor positive** effects are anticipated overall.

## Vibrant communities

- 9.140 Sustainability objective:

- Create and sustain vibrant communities

### Commentary on draft policies

- 9.141 Community facilities are viewed as integral to promoting healthy, inclusive and safe communities in line with paragraph 91 of the NPPF. The Council have already planned and made provision for required key supporting infrastructure with its partners, such as Surrey County Council. This includes for the delivery of a range of community facilities, including new and expanded schools, health care facilities and other community uses, catering for planned growth and needs in the borough.
- 9.142 Context is provided by LPSS, and Policy H1 (Homes for all) sets out to ensure new development provides a mix of housing tenures/ types/ sizes, with a view to meeting the accommodation needs established by the latest Strategic Housing Market Assessment (SHMA), recognising that *“sufficient housing to meet the needs of the borough’s population will ensure that the borough thrives, with mixed, balanced communities”*.
- 9.143 LPSS Policy ID1 (Infrastructure and delivery) seeks to ensure the timely provision of suitable, adequate infrastructure recognising that historically infrastructure provision and upgrading has not always kept pace with the growth of population, and some infrastructure is currently at or near to capacity, or of poor quality. The policy is clear that: *“where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused.”* The Infrastructure Delivery Plan that supports this Plan focuses on a range of types of infrastructure, including GPs and dental surgeries, hospital and community health care, libraries, cemeteries, and sports facilities. Further to this, Policies E7 - E9 (Retail and Service Centres) set out to ensure a hierarchy of retail and service centres, of differing scale and functions, that complement one another and meet the needs of communities.

- 9.144 LPSS SA Report Addendum (2018) concluded that “*Assuming appropriate phasing of infrastructure delivery alongside housing growth (as required by Policy ID1), the plan should lead to a situation whereby development leads to ‘sustainable’ new communities and also wide ranging benefits to existing communities (e.g. in respect of secondary school provision). Having said this, it is recognised that some aspects of the strategy are less than ideal, and many uncertainties exist, including in respect of traffic congestion.*” Significant positive effects were predicted, though with some uncertainty.
- 9.145 LPDMP seeks to enhance policy provisions relating to communities, but also recognises that local communities are often best placed to identify buildings or land that furthers their social wellbeing or social interests as well as neighbourhood infrastructure needs. In this regard, area and neighbourhood infrastructure needs may be set out in Neighbourhood Plans.
- 9.146 **Policy ID8** (Community Facilities) which captures key community facilities and supports the appropriate replacement or expansion of them, as well as restricting their loss. The policy also seeks to conveniently locate new facilities to maximise accessibility. This is supported by the provisions of **Policy ID5** which provides protection for existing spaces and identifies that where provision of open space exceeds minimum standards it will not be considered ‘surplus’. Policy ID9 (Retention of Public Houses) further seeks to retain pubs where they are recognised as viable and of value to the community.
- 9.147 **Policy ID6** (Open Space in New Developments) further sets out open space standards for new residential development in the Borough, with provision requirements increasing as the size of the development increases. The Policy identifies that the strategic LPSS sites are expected to provide for all types of open space (amenity/ natural green space, parks & recreation grounds, children’s play space, youth play space, and allotments). This is supported by quantity and access standards for each typology. The policy clearly identifies the anticipated contributions in the future growth of the Borough and is likely to support minor long-term positive effects for communities, not only by providing new space in line with minimum space standards, but also by ensuring that such spaces are with reasonable walking distances.
- 9.148 Further to this, **Policy ID6** also requires new open spaces “*to be multi-functional spaces that deliver a range of benefits, including biodiversity gains, flood risk improvements, climate change measures and social inclusivity*” and “*support and enhance the existing rights of way network, providing new footpaths and cycle links where possible*” all to the benefit of all communities. Open space and community facilities are viewed as integral to promoting healthy, inclusive and safe communities and the support for the retention and enhancement of community facilities provided through the proposed infrastructure delivery policies will be beneficial in this respect.
- 9.149 The development of active travel networks will also support communities with improved travel choices, and **Policy ID10** (Achieving a Comprehensive Guildford Borough Cycle Network) aims to “*achieve a comprehensive Guildford Borough cycle network*”. The Policies Map identifies specific routes where the Council will undertake or promote measures to encourage cycling “*including improvements to the safety and convenience of the routes, the designation of cycle tracks, the designation of cycle lanes, and the signposting and the provision of cycle parking facilities*”, and the policy requires consideration of this in all new developments.
- 9.150 The provisions of **Policy D4** (Achieving High-Quality Design and Local Distinctiveness) will also support community vitality by retaining and enhancing the character and quality of key town and service centres to maintain and increase their attraction and offer. The provisions of **Policy D11** (Corridor of the River Wey and Guildford and Godalming Navigation) also support the aims of the Guildford Town Centre Regeneration Strategy; specifically seeking “*publicly accessible riverside walkways and/ or cycle routes to enhance the vitality of the riverside*” to the benefit of local communities.

### Appraisal of Draft LPDMP

- 9.151 LPDMP views open space and community facilities as integral to promoting healthy, inclusive and safe communities and the support for the retention of viable community facilities, including pubs, provided through the proposed infrastructure delivery policies will be beneficial in this respect. This is considered alongside measures to improve accessibility and deliver high-quality design supportive of community vitality. As a result, **minor positive effects** are anticipated overall.

## Waste

9.152 Sustainability objective:

- Reduce waste generation and achieve the sustainable management of waste and materials

### Commentary on draft policies

9.153 The Surrey Waste Plan (2019) seeks to address the need for waste facilities and identifies appropriate sites for such facilities. The Plan contains development management policies for consideration in planning applications for waste development in Surrey.

9.154 LPDMP supports the objectives of the Surrey Waste Plan through the identification of the intrinsic links between development design and waste. **Policy D12** (Sustainable and Low Impact Development) requires significant development proposals (with an estimated cost of £400,000 or more) to be accompanied by a Site Waste Management Plan to be submitted within or alongside the sustainability statement/ sustainability information.

### Appraisal of Draft LPDMP

9.155 The SA objective will be largely influenced by the directions of the Surrey Waste Plan, and LPDMP supports the objectives of the Surrey Waste Plan through the provisions of Policy D12 ensuring that major development fully considers its impact in relation to waste generation and waste management. As a result, **minor positive effects** are anticipated overall.

## Water quality

9.156 Sustainability objective:

- Maintain and improve the water quality of the borough's rivers and groundwater

### Commentary on draft policies

9.157 Water quality is intrinsically linked with a number of the other SA themes, including water resources, flood risk, biodiversity, health, and community wellbeing. The Borough has an extensive and varied water environment, including numerous aquifers, rivers, lakes, ponds, reservoirs and aquifer protection zones. Maintaining and enhancing the quality of these water resources is important to help retain these essential sources of water supply. Additionally, the maintenance of a high-quality water environment is also valuable for general amenity and recreational resources. The draft Plan recognises that *"the protection of the water environment is particularly important within the borough as the quality of groundwater resources are easily polluted, directly and indirectly, and can pose a serious risk to public health."*

9.158 The River Wey is the main waterbody within the Plan area, and much of the river currently achieves 'moderate' status, with some tributaries currently achieving only 'poor' or 'bad'. The River Wey directly upstream from the Borough is largely 'poor' quality status. The draft River Wey Catchment Plan<sup>25</sup> identifies high levels of phosphate (both from wastewater treatment and other sources) and fish as the predominant issues affecting the waterbodies that form the river. The Wey Fishpass and Wetland Delivery Project (WeyFWD) has been developed to deliver prioritised fish passage solutions which will contribute to alleviating some of these issues and support movement of the River towards 'good' ecological status.

9.159 Groundwater presents an important consideration for development proposals, with approximately 30 per cent of the borough located on principle aquifers and the presence of 14 source protection zones (SPZ). Flooding can also significantly affect water quality and flood schemes such as habitat restoration and barrier removal are identified for their potential to deliver multiple benefits for flood risk, biodiversity and water quality.

9.160 LPDMP does not propose any further growth to that outlined through LPSS, and development itself is considered likely to be the greatest impact on water quality in terms of land take, water resources and any further modification to waterbodies, flood risk and pollution. In this respect, no significant negative effects are anticipated in the implementation of LPDMP.

<sup>25</sup> Wey Landscape Partnership (2018) Draft River Wey Catchment Plan [online] available at: [https://surreynaturepartnership.files.wordpress.com/2018/05/wlp-catchment-plan\\_sert\\_draft-v3.pdf](https://surreynaturepartnership.files.wordpress.com/2018/05/wlp-catchment-plan_sert_draft-v3.pdf)

- 9.161 LPSS contains policy provisions to support water quality. In particular **Policy P4** (Flooding, Flood Risk and Groundwater Protection Zones) requires development within Groundwater Source Protection Zones and Principal Aquifers to have no adverse impact on the quality of the groundwater resources and to not put at risk the ability to maintain a public water supply. **Policy ID4** (Green and Blue Infrastructure) also seeks to ensure that development proposals comply with the Water Framework Directive in relation to water quality.
- 9.162 LPDMP proposes further policy protections for water quality that are likely to deliver minor long-term positive effects. **Policy P12** (Water Resources and Water Quality) seeks to ensure that “*opportunities to improve water quality are used wherever possible*” and development will not cause unacceptable deterioration to water quality or have an unacceptable impact on “*the quality of surface or groundwater bodies*”. The policy further requires “*new development that is likely to have an impact on underground or surface water bodies covered by the Water Framework Directive and the South East River Basin Management Plan to contribute towards though water bodies maintaining or achieving ‘Good Ecological Status’*”.
- 9.163 **Policy P13** (Sustainable Drainage Systems) requires development proposals to “*demonstrate that SuDS have been included from the early stages of site design*” and the support for appropriate surface water management is likely to indirectly benefit water quality, particularly in extreme weather events and flash flooding.

### Appraisal of Draft LPDMP

- 9.164 LPDMP proposes additional policy protections directly relating to maintaining and improving water quality. The additional policy provisions for suitable management of surface water are also considered for minor indirect positive effects, particularly in extreme weather events and flash flooding. As a result, **minor positive effects** are anticipated overall.

## Water resources

- 9.165 Sustainability objective:

- Achieve sustainable water resources management and water conservation

### Commentary on draft policies

- 9.166 The region is identified as an area under severe water stress, which is considered likely to worsen given climate change forecasts and population increases. Thames Water manage water resources within Guildford, and their latest Water Resources Management Plan<sup>26</sup> (WRMP) identifies one of the key measures to reduce consumption will be promoting through promoting water efficiency in the region. The WRMP further recognises the need to increase water supplies through new groundwater resources and reservoirs as well as new water transfers.
- 9.167 LPDMP does not propose any further growth that could place increased pressures upon maintaining adequate water supplies, however the draft Plan does include additional policy provisions which can support the delivery of positive effects.
- 9.168 The context is set by LPSS which has identified through adopted Policy D2 (Climate change, sustainable design, construction and energy) a requirement for “*water efficiency that meets the highest national standard*” in the design and construction of development. This is supported by proposed LPDMP **Policy P12** (Water Resources and Water Quality) which requires developers to demonstrate that it will not cause unacceptable deterioration to the flow or quantity of groundwater, and supports appropriate “*development or expansion of infrastructure associated with water supply, surface water drainage and wastewater treatment facilities*”. This is alongside the provisions of proposed LPDMP Policy D12 (Sustainable and Low Impact Development) which expects “*all development proposals to incorporate measures to harvest and conserve water resources and, where possible, incorporate water recycling/ reuse*”. The policy provisions are likely to support the objectives of the WRMP in promoting water efficiency, and the provisions further maximise opportunities to enhance water resource infrastructure. Combined, the policy provisions therefore have a high potential for minor long-term positive effects in relation to water resources.

<sup>26</sup> Thames Water (2019) Shape your water future: Our updated revised draft water resources management plan 2019 [online] available at: <https://corporate.thameswater.co.uk/about-us/our-strategies-and-plans/water-resources>



## Appraisal of Draft LPDMP

- 9.169 Overall, the policy provisions of LPDMP enhance the provisions of LPSS by providing further protection for groundwater resources and supporting enhanced water resource infrastructure provisions. On this basis, **minor positive effects** are anticipated overall in relation to water resources.

## Overall conclusions on the Draft LPDMP

- 9.170 LPDMP is an extension to LPSS in that it seeks to deliver a supporting policy framework for the provisions and allocations established in LPSS. LPDMP does not propose any additional growth or site allocations which significantly reduces the potential for negative effects.
- 9.171 Overall the LPDMP is predicted to result in wide-ranging positive effects, although these are predicted to be 'minor' other than in respect of biodiversity (given the proposed approach in respect of biodiversity net gain requirements) and health (numerous proposed policies will act cumulatively in support of good health).
- 9.172 The appraisal does not predict negative effects in respect of any sustainability objective; however, uncertain effects are concluded in respect of climate change mitigation objectives. There is inherent uncertainty given the Government's recent consultation on setting new national sustainable design and construction standards, and the appraisal also highlights a degree of tension resulting from the LPDMP proposed approach to housing density (flexible criteria-based) and support for minimum parking standards outside of the town centre.
- 9.173 Moving forward, the Council should take account of the appraisal findings presented within this section alongside responses received as part of the current consultation, when preparing the final draft 'proposed submission' version of the LPDMP. Specifically, the Council should seek to address the uncertainties highlighted in respect of climate change mitigation (also other minor 'tensions' discussed within the appraisal text) and seek to ensure that the predicted positive effects are further enhanced.

## Part 3: What are the next steps?

## 10. Plan finalisation

### Publication of the Proposed Submission LPU

- 10.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of LPDMP for publication under Regulation 19 of the Local Planning Regulations 2012. The Proposed Submission LPDMP will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission LPDMP will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.
- 10.2 The SA Report will be published alongside the Proposed Submission LPDMP. It will provide all the information required by the SEA Regulations 2004.

### Submission, examination and adoption

- 10.3 Once the period for representations on the Proposed Submission LPDMP / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether LPDMP can still be deemed 'sound'. If this is the case, LPDMP will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.4 At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to LPDMP these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.5 Once found to be 'sound' LPDMP will be formally adopted by the Council. At the time of adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

## 11. Monitoring

- 11.1 The SA Report must present 'measures envisaged concerning monitoring'.
- 11.2 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
  - Air quality;
  - Biodiversity net gain;
  - Housing densities;
  - Residential parking.

# Appendix I: Regulatory requirements

As discussed in Chapter 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report (N.B. this current report is not the SA Report, but aims to present the information required of the SA Report nonetheless); however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
<b>Introduction</b>		What's the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
		What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>		What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
<b>Part 2</b>		What are the SA findings at this current stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
<b>Part 3</b>		What happens next?	<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

Table B: Questions answered by this SA Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	The environmental characteristics of areas likely to be significantly affected	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	
(i) a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C presents a discussion of more precisely how the information within this report reflects the SA Report requirements (N.B. to reiterate this report is not the SA Report).

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report, which was updated post consultation and is now available on the website.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA framework', and this is presented – in an updated form - within Section 3 ('What's the scope of the SA').
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance...;	Messages highlighted through context and baseline review are also presented within Appendix II.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'.</p> <p>The SA framework is presented within Section 3. Also, messages from context review are presented within Appendix II.</p> <p>With regards to explaining "<i>how... considerations have been taken into account</i>", Section 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).</p>
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings (in relation to three key plan issues), whilst Section 9 presents an appraisal of the Draft Plan. All appraisal work naturally involved giving consideration to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	A range of recommendations are made as part of the draft plan appraisal presented in Section 9.

Regulatory requirement	Information presented in this report
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with ‘reasons for selecting the alternatives dealt with’, with an explanation of reasons for focusing on certain issues / options. Also, Section 7 explains the Council’s ‘reasons for selecting preferred options’. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 11 presents measures envisaged concerning monitoring.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
<b>The SA Report must be published alongside the draft plan, in-line with the following regulations</b>	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim SA Report is published alongside the Draft Plan, in order to inform the current consultation and next steps.
<b>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</b>	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when preparing the Proposed Submission Plan, alongside consultation responses received on the Draft Plan and this Interim SA Report.

# Appendix II: The SA Scope

This appendix supplements Section 3 by presenting information from the Scoping Report (2019). Specifically: Table A presents key issues in respect of each of the sustainability topics that comprise the SA framework; and Table B presents the SA objectives alongside associated appraisal questions / prompts. N.B. topics are grouped by type rather than listed in alphabetical order (the approach taken elsewhere in this report).

Table A: Key issues and opportunities

Topic	Significant issues identified	Evolution in the absence of the Plan
<b>Air quality</b>	<ul style="list-style-type: none"> <li>• Since the publication of the last SA Scoping report in 2013, two AQMAs were declared in the period 2017-2019.</li> <li>• A reduction in NOx emissions is required to achieve the annual mean objective value of 40 µg/m3.</li> <li>• New development will lead to increased car use and congestion leading to localized air quality issues.</li> <li>• Adverse economic, social and environmental impacts of high traffic volumes and a culture of dependence on private car use including recurrent traffic congestion on certain parts of the network at certain times of day, road collisions, community severance, obesity, noise pollution, local air pollution, greenhouse gas emissions, high demand for parking, and amenity of local neighbourhoods.</li> </ul>	<p>Without additional measures to tackle the issue of air quality in the AQMAs, the level of NO2 concentrations may not improve in the future. The AQMAs in the borough will be dealt through measures and objectives set out in the adopted AQMP (2019).</p> <p>The recent national policies and the emergence of new technologies are likely to improve air pollution, for example, through cleaner fuels/energy sources, and the shift towards electric and low emissions vehicles is likely to gather pace over the plan period. However, the development of new housing across the borough will inevitably result in a higher number of cars on the roads. The Plan can provide an opportunity to contribute to improved air quality in the borough through the sustainable siting of development and the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations and inclusion of a DM policy dealing with tackling NO2 emissions in the AQMAs.</p>
<b>Natural capital and natural environment</b>	<ul style="list-style-type: none"> <li>• Protecting green spaces and erosion of valued natural places as a result of increased pressure for housing and associated transport.</li> <li>• Protecting and enhancing priority habitats and species in accordance with Surrey Nature Partnership targets.</li> <li>• Potential loss of biodiversity as a result of increased pressure for development to accommodate demand for housing.</li> <li>• Large areas of the borough are covered by biodiversity designations, including internationally important SPAs,</li> </ul>	<p>New development and associated traffic growth and congestion may cause air pollution hence causing negative effects on air and water quality leading to deterioration of natural and built environment. In the absence of the Plan, the issue of potential biodiversity loss as a result of new development would be addressed through adopted policy "ID4: Green and blue infrastructure". However, there may not be an opportunity to meet the requirements of meeting quantified set percentage target of biodiversity net gain as set out in the new legislation. Because of Green Belt, there may be increased pressure to develop areas of relative biodiversity outside of the settlement boundaries, with possible impacts to habitats and species of local and national importance. Opportunities to provide a mechanism to manage the effects of undirected development, such as disturbance to habitats and species,</p>

Page 328

Appendix 4  
Agenda item number: 9



Topic	Significant issues identified	Evolution in the absence of the Plan
	<p>nationally important SSSIs, SACs, SNClIs, and ancient woodland.</p> <ul style="list-style-type: none"> <li>• Out of a total 404 priority species of national conservation concern, 31.2% are already extinct locally, while 37.1% are threatened and/or remain in worrying decline. This only leaves the remaining 31.7% presently considered stable or recovering.</li> <li>• Huge numbers of Surrey's trees fall outside woodlands and here remain vulnerable to indiscriminate removal</li> <li>• Habitat decline from lack of management and developing woodland.</li> <li>• Sites provide habitat for ground nesting birds and are sensitive to visitor pressure.</li> <li>• Invasive species, fire risk, flooding</li> </ul>	<p>inappropriate use of land and impacts from pollution and water run-off may be missed. However, by allocating sufficient land the LPSS 2015-2034 should guard against this development pressure.</p> <p>Increased development will put pressure to use areas of green space for development purpose, severing corridors and reducing quality and quantity of natural environment and connectivity between areas green space. Existing policies are not considered to provide an appropriate scale of guidance for the management of potential contamination, pollution, habitat fragmentation, management of priority habitats and priority species as a result of new development.</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
<p><b>Climate change</b></p>	<ul style="list-style-type: none"> <li>The impacts of climate change will not be equal or fair, and are likely to increase existing inequalities.</li> <li>The flood events are likely to become more common therefore flood risk management should be considered in Guildford.</li> <li>CO<sub>2</sub> emissions per capita are 5.3 tonnes and are still higher than per capita CO<sub>2</sub> emissions for Surrey, the South East region and England, with 5.2, 4.8 and 5.1 tonnes respectively.</li> <li>Predicted droughts will have implications for biodiversity as well as water supplies.</li> <li>Summer overheating potentially contributing to heat-related health problems.</li> <li>Climate change may alter the impact that agriculture and forestry have on the natural environment and the value of the ecosystem services provided.</li> </ul>	<p>In the absence of the Plan, climate change effects will continue including increased temperatures, severe storms and flooding. The effects of climate change will not be experienced equally. The issue of overheating in buildings as a result of rising temperatures may not be sufficiently addressed as existing Building Regulations in the UK do not have a minimum standard for decrement delay so the decision to design with overheating in mind rests solely with us.</p> <p>Closing the performance gap between design intent and regulatory requirement is likely to become an important issue over the next decade if we are to deliver the climate and environmental targets related to buildings and the new Plan can address through inclusion of relevant DM policies, that will provide specific details and thus add certainty to the developer of the Councils expectations of how the requirements stipulated in Policy D2 can be met.</p> <p>Additional policies may be required to ensure that new development is to mitigate its impact on climate change by reducing embodied CO<sub>2</sub> emissions and using resource efficiency and low impact construction techniques and thus reducing the impact on the environment, society, economy and climate change, by promoting high standards for thermal performance and energy efficiency, the up-take of low carbon energy, and water efficiency incorporating sustainable drainage measures and sustainable design.</p> <p>Without a Plan, an opportunity to provide clarity and direction on the location of potentially suitable sites for large-scale renewable energy development without compromising the value of sensitive landscape may not be explored.</p> <p>Introduction of further measures for water conservation will be missed and no due consideration will be given to the risks of wildfire.</p>
<p><b>Sustainable transport and accessibility</b></p>	<ul style="list-style-type: none"> <li>Car ownership is high and the percentage of people travelling to work by car or van appears to have increased substantially.</li> </ul>	<p>In the absence of the Plan, the opportunity to maximise the use of the sustainable transport modes of walking, cycling, and the use of public and community transport, and opportunities for people with disabilities to access all modes of transport will be realised through <i>Policy ID3: Sustainable transport for new developments</i>. Although the site allocations and the proposals in the LPSS will provide opportunities to use active modes and may result in a</p>

Agenda item number: 9

Appendix 4

Topic	Significant issues identified	Evolution in the absence of the Plan
	<ul style="list-style-type: none"> <li>Public transport has a poor reliability rate compared to national averages.</li> <li>Many key roads and junctions in the wider area suffer from severe congestion and long journey times. This also affects the quality of public transport provision.</li> <li>Local accessibility issues especially affect people who experience social exclusion, with linked issues related to personal security, cost, lack of easy-to-understand travel information and reliability of services.</li> <li>Adverse economic, social and environmental impacts of high traffic volumes and a culture of dependence on private car use including recurrent traffic congestion on certain parts of the network at certain times of day, road collisions, community severance, obesity, noise pollution, local air pollution, greenhouse gas emissions, high demand for parking, and amenity of local neighbourhoods.</li> <li>According to the Defra's noise map data, noise levels on the A3 running through Guildford are excessive on some sections of the road and its vicinity and can potentially have impacts on human health.</li> </ul>	<p>modest modal shift over the period to 2034, there will be still an absolute increase in overall traffic volumes. Accordingly, schemes to increase highway capacity and improve road safety were included in the LSPP in order to mitigate the principal adverse material impacts of this forecast growth in traffic volumes. AECOM SA Report (2017) found that: 'Whilst transport/traffic constraints are widespread across Guildford Borough, it is apparent that the spatial strategy has been developed in order to reflect variations in constraint and opportunity, most notably through focusing growth at locations along a Sustainable Movement Corridor in the urban area of Guildford, and at locations in proximity to a rail station. Policy commitments regarding the phasing of infrastructure are also of critical importance.'</p> <p>Without the Plan, preventive measures of noise pollution in combating noise-induced health hazards may not be fully explored.</p>
<p><b>Economic competitiveness and employment</b></p>	<ul style="list-style-type: none"> <li>The availability of employment sites is an issue for the borough.</li> <li>The cost and availability of housing influences where people live, where they work and the availability of local labour. This is already adversely affecting some of the businesses in the borough and increasing congestion as more people are travelling longer distances to work in the borough.</li> <li>Broadband and the need for higher internet speeds is as a key priority for businesses across the borough, from rural to town centre businesses where access to increased</li> </ul>	<p>In the absence of the Plan, it is assumed that relevant policies in the current Local Plan and National Planning Policy would apply. It is uncertain how the job market will change without the implementation of the Plan, particularly given the uncertainties posed by Brexit.</p> <p>Policy E3 of the Local Plan: Strategy and Sites (LPSS) 2015 – 2034 addresses the availability of employment sites by designating several Strategic and Locally Significant Employment Sites, which are priority locations for the development of further Use Class B1-B8 employment uses in line with their designation (as per LPSS policy E2). Employment uses on these sites are also protected against change of use to other non-employment uses. The LPSS also allocates mixed-use sites that include a requirement for employment floorspace and one site specifically for employment uses; these sites will also increase the amount of land available for new businesses or business relocation and expansion.</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
	<p>speeds is necessary to perform at the cutting edge of the business innovation.</p> <ul style="list-style-type: none"> <li>• There are pockets of disadvantage and concentrations of people on low incomes, in receipt of benefits and with no or low qualifications, with some areas being amongst the most deprived in Surrey</li> <li>• The borough experiences high levels of traffic congestion in the town centre and on major routes during peak hours. This is a concern for local businesses and residents.</li> <li>• Unemployment levels are low but there is an increasing trend and pockets of higher unemployment in deprived areas.</li> <li>• Uncertainty associated with the effect Brexit will have on Guildford economy.</li> </ul>	<p>Policy E5 of the LPSS provides a positive framework to promote economic growth in rural areas and avoid stifling opportunities, however some additional detailed enabling policy wording may still be beneficial to stimulate and develop the rural economy, encourage innovative projects and capitalise on opportunities to diversify the economic activities of existing businesses in these areas.</p>
<b>Flood risk</b>	<ul style="list-style-type: none"> <li>• Some areas of the borough, including Guildford town centre, are at risk of fluvial and surface water flooding.</li> <li>• Over recent years the borough has witnessed more frequent flooding.</li> <li>• New developments typically introduce impermeable surfaces, which may increase the speed and amount of surface water run-off and can exacerbate flooding.</li> </ul>	<p>The issue of flooding is addressed through the existing Local Plan policies ID4 and P4. However, in the absence of the Plan, additional measures to adapt to potential impacts of climate change the resilience of new development will not be realized to accommodate the risks of flooding, i.e. reducing surface water runoff by prioritizing the use of permeable surfaces; green infrastructure and sustainable drainage systems as appropriate in accordance with Policy ID4.</p>
<b>Geology and soils</b>	<ul style="list-style-type: none"> <li>• The majority of the agricultural land within the borough is classified as Grade 3 (a or b) and 4 (lower quality) with small pockets of Grade 2.</li> <li>• Contamination issues may arise on previously developed sites.</li> </ul>	<p>Development is likely to take place on previously developed sites to the extent possible, given the promotion of such through national policy. However, the supply of previously developed sites is likely to decline over time as more are developed and therefore greenfield sites are likely to be required.</p> <p>The proportion of high-quality agricultural land within the borough is relatively small and therefore it is unlikely that this will be at risk from development, given that there is a higher proportion of land that is classified as being of lower quality.</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
<b>Historic environment</b>	<ul style="list-style-type: none"> <li>Reducing the amount of designated assets that are at risk.</li> <li>Preventing loss or damage of designated assets.</li> <li>Some designated assets are still at risk from neglect, decay or inappropriate development.</li> </ul>	<p>The number of Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and Historic Parks and Gardens means that much of the borough’s character and distinctive built heritage will continue to be conserved and protected from future development. However, if development of these sites (or in their setting) does occur, dependent on form and design, the cultural heritage interests could potentially be affected.</p> <p>In the absence of the Plan, some designated assets may still be at risk from neglect, decay or inappropriate development.</p>
<b>Housing to meet the needs of the population</b>	<ul style="list-style-type: none"> <li>There is an ongoing shortage of affordable housing, particularly for first time buyers.</li> <li>High average house prices create affordability problems for local people, first time buyers and essential key workers.</li> <li>The number of overcrowded households in Guildford has significantly increased.</li> <li>There is a deficit in affordable housing supply and the current completion rate is below the annual level required to address the deficit.</li> <li>The need for accommodation for people with care and support needs is likely to increase, given the projected increases in population and the proportion of older people in the borough.</li> <li>Achieving balance between sustainable higher density developments and the impact of density and development on the character of local areas.</li> </ul>	<p>Without the Plan, it is likely that house prices will continue to rise across the County. The population of the borough is expected to increase in future years. This is likely to exacerbate current shortages of housing and increase housing need. Furthermore, the need for affordable housing for local people unable to compete in the open market is likely to continue to be unmet. The issue of overcrowding and affordability ratio will worsen. This is a problem shared by the rest of the South East region. However, the LPPS offers opportunity to facilitate and expedite the delivery of affordable housing across the borough. LPSS 2015-2034 intends to meet projected need and addresses affordable housing issues thus aiming to address the aforementioned issues.</p>
<b>Population, poverty and social inclusion</b>	<ul style="list-style-type: none"> <li>Population increases and are likely to place additional pressure on house prices and availability.</li> <li>The age structure of the borough will require continued monitoring as age shifts will have long term implications for health care needs, housing mix and other social services.</li> </ul>	<p>In the absence of the Plan, there will be less opportunity to plan positively to reduce deprivation and improve social inclusion. Disparities in deprivation are going to increase. Food poverty has economic, social, and health impacts and there is a need to tackle the root cause of food poverty and insecurity in the borough.</p> <p>The population in Guildford is predicted to increase to just over 162,900 in 2041 and with more elderly people living in the area due to longer life expectancy and in-migration there will be an increased demand on health and social support services. Whilst the LPSS allocates some sites for care homes and supports specialist accommodation – it doesn’t set</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
	<ul style="list-style-type: none"> <li>Some pockets of deprivation persist; there is a negative trend of increased disparities across the wards pointing to a widening inequality.</li> <li>Food and fuel poverty and insecurity are issues that need priority action.</li> <li>Crime rates are up in Guildford, with Guildford town centre having the highest proportion of reported crimes.</li> <li>There is a need to reduce the inequalities gap between those living in the most and least deprived parts of Guildford.</li> <li>Food poverty is a growing issue across the borough.</li> <li>The population of Guildford is highly qualified compared to the regional and national averages however the gap between national and regional averages is lessening.</li> </ul>	<p>targets to meet the full identified need. It also requires a percentage of accessible homes on sites of 25+ homes.</p> <p>Without initiatives to develop more vocational courses and job specific qualifications the disparity between those with qualifications and those without will remain.</p> <p>Without the Plan, it is likely that the gap between the most and least deprived areas in Guildford will continue to widen.</p>
<b>Materials, waste and water resources</b>	<ul style="list-style-type: none"> <li>There is an identified need to reduce the proportion of waste sent to landfill and increase the proportion of waste that is recycled and composted.</li> <li>There is an ongoing need to continue to focus on reducing Local Authority Collected Waste (LACW) in line with waste prevention which sits at the top of the waste hierarchy.</li> <li>Given climate change forecasts and population increases, water shortage will be very an important issue in our borough in the plan period.</li> </ul>	<p>The issue of the efficient use of materials, water and waste recycling will be addressed through existing policies adopted in the Plan, e.g. D2 (d) which requires development to meet the highest national standard, currently “optional requirement” described in Building Regulation 36 2(b). However, relying only upon the existing policy may not provide enough encouragement for all development proposals including conversions, extensions and changes of use to incorporate facilities to recycle, harvest and conserve water resources.</p> <p>Neither there would be sufficient encouragement on how to facilitate circular economy systems to support sustainable and low impact development.</p>
<b>Water quality</b>	<ul style="list-style-type: none"> <li>River quality is generally poor and showed no signs of improvement since the last SA report published in 2013.</li> <li>Some WFD objectives can only be delivered via catchment wide/cross-boundary planning.</li> <li>Much of the River Wey in the borough currently achieves ‘moderate’ status, with some tributaries achieving only ‘poor’ or ‘bad’.</li> </ul>	<p>In the absence of the Plan, there will be reliance on developers entering discussion with the Environment Agency at planning application stage and the existing Local Plan Policies ID4 and P4.</p> <p>New development is likely to cause an increase in run-off and potential contamination and disruption of flows for surface water and groundwater. Without additional policies the current</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
	<ul style="list-style-type: none"> <li>Certain types of development pose risks to ground and surface water quality.</li> </ul>	<p>water quality status of the River Wey may not improve and further even worsen due to pressure from development.</p>
<p><b>Health and health Inequalities</b></p>	<ul style="list-style-type: none"> <li>Considerable differences between wards in life expectancy for both men and women, although with such small areas there is uncertainty about the precise estimate.</li> <li>Adult and child obesity is an issue; since 2014 obesity and excess weight rates are 13.5% higher in deprived wards than the average Surrey ward.</li> <li>One in four adults drinks alcohol above sensible levels; this places Guildford in the top ten council areas nationally for hazardous drinking.</li> <li>The number of adults with a learning disability in Guildford was 2,824 in 2017, and was the highest among the neighbouring local authorities. This is projected to increase to 3,085 people with a learning disability and 1,307 people with autism by 2030. Of these, an estimated 597 adults have a moderate or severe learning disability (143 of whom have a severe learning disability) and this is estimated to increase to 152 by 2030.</li> <li>There is an under supply of the majority of open space</li> <li>typologies across the majority of the wards, most notably youth provision.</li> <li>Deficiencies in open space provision have a disproportionate effect on certain groups, i.e. lone parents, families with children under 5.</li> <li>In Guildford Borough 5.7 per cent of deaths of those aged 25 years and over arise from long-term exposure to anthropogenic particulate air pollution.</li> <li>Low levels of physical activity.</li> <li>Rising fuel poverty from 8.0 per cent in 2012 to 9.1 per cent in 2016, the highest among the neighbouring authorities.</li> <li>Rising food poverty in the borough.</li> </ul>	<p>In the absence of the Plan, it is assumed that relevant policies in the current Local Plan and National Planning Policy would apply.</p> <p>Demands on healthcare in the borough will increase due to a growing population and an increasing elderly population. The issue of rising obesity, fuel and food poverty may not be adequately addressed through current policies in existing Plan.</p> <p>The existing lack of open space provision in most deprived areas will likely to further exacerbate deprivation and health inequalities. Lack of opportunities to address deficiencies in open space provision in wards with high level of deprivation, i.e. Westborough, Ash Vale and Worplesdon will not specifically addressed.</p> <p>An opportunity to specify that the provision of adequate open space to provide health related Interventions, particularly within the wards which are the public health focus may not be explored.</p> <p>In the absence of the Plan, an opportunity for the Council to adopt a <i>health in all policies approach</i> supported by integration of impacts on human health in the SA framework may be missed. The opportunity to provide a foundation for delivery of activities and services that maintain and improve the health and well- being of our communities may not be fully explored. This can be achieved through inclusion of a DM policy that seeks to improve health and address health inequalities.</p>

Table B: The SA framework

SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
<b>Social</b>			
Population Housing	<b>1. To meet housing requirements of the whole community and provide housing of a suitable mix and type</b>	<ul style="list-style-type: none"> <li>Contribute to the supply of housing?</li> <li>Reduce homelessness?</li> <li>Contribute to meeting demand for a range and mix of housing including affordable housing and specialist housing?</li> <li>Contribute to the delivery of sustainable homes?</li> <li>Support those with disabilities?</li> </ul>	<ul style="list-style-type: none"> <li>Housing affordability as a function of lower quartile income to lower quartile house price (this should decrease, i.e. become more affordable)</li> <li>Completion rates of affordable housing in new developments (this should increase)</li> <li>Housing completions that provide for long-term care and disability (this should increase)</li> <li>Number of planning permissions for student accommodation</li> <li>Number of pitches or plots granted planning permission for Gypsy and Traveller</li> <li>Affordable housing register (this should decrease)</li> </ul>
Population Human health	<b>2. To facilitate improved health and well-being of the population, enabling people to stay independent and reducing inequalities in health</b>	<ul style="list-style-type: none"> <li>Improve access to health facilities and social care services?</li> <li>Include policies that promote “health in all policies” approach, clearly referring to health and wellbeing as an outcome?</li> <li>Reduce human exposure to air pollution from traffic emissions?</li> <li>Contribute towards reduction of inequalities in health outcomes and strive to improve the overall physical and mental health and wellbeing of the borough?</li> <li>Deliver sufficient community and cultural facilities and services to meet local needs, with particular focus on wards with poorest health outcomes including Stoke, Westborough and Ash Wharf or other priority wards?</li> <li>Avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development?</li> <li>Encourage healthy lifestyles and takes into account priorities set out in Guildford and Surrey Health and Wellbeing Strategies?</li> <li>Avoid locating development in locations that could adversely affect people’s health?</li> </ul>	<ul style="list-style-type: none"> <li>Healthy Life expectancy (number of years living in a good state of health) (this should increase)</li> <li>Proportion of population in full-time care</li> <li>Proportion of population that is over retirement age</li> <li>Condition of residents’ general health (Census - QS302EW)</li> <li>Number of noise complaints received by Environmental Health</li> <li>Number of large developments completed a Health Impact Assessment</li> </ul>
Population Human health Crime and safety	<b>3. To create and maintain safer and more secure communities and improve</b>	<ul style="list-style-type: none"> <li>Promote access to safe, inclusive and accessible, open spaces, in particular for women and children, older persons and persons with disabilities?</li> <li>Reduce crime/ fear of crime and anti-social activity?</li> </ul>	<ul style="list-style-type: none"> <li>Level of recorded crime and anti-social behaviour</li> <li>Number of new developments achieving the ‘Built for Life’ quality mark</li> <li>(this should increase)</li> </ul>

Agenda item number: 9 Appendix 4

Page 336



SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
	<b>the quality of where people live and work</b>	<ul style="list-style-type: none"> <li>Promote design that incorporate the principles of safe design to reduce the risk and fear of crime, e.g. natural surveillance, appropriate levels of lighting?</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of the district's population having access to an Open Space within 400 metres of their home</li> <li>Hectares of Open Space per 1,000 population</li> <li>Change in the amount of Open Space (Natural England)</li> </ul>
<i>Population Economy and employment</i>	<b>4. To reduce poverty and social exclusion for all sectors of the community</b>	<ul style="list-style-type: none"> <li>Reduce poverty and social exclusion in those areas most affected?</li> <li>Reduce food and fuel poverty</li> <li>Promote development that benefit Guildford's most deprived areas?</li> <li>Support the changing population profile of the area?</li> <li>Encourage engagement/participation in community/cultural activities?</li> <li>Contribute to regeneration activities?</li> <li>Enhance the public realm?</li> </ul>	<ul style="list-style-type: none"> <li>Long term unemployment rate</li> <li>Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country (Index of Multiple Deprivation)</li> <li>Proportion of population in food and fuel poverty (this should decrease)</li> </ul>
<i>Population Equalities</i>	<b>5. To create and sustain vibrant communities</b>	<ul style="list-style-type: none"> <li>Facilitate the integration of new communities with existing communities by delivering a mix of supporting/other uses alongside housing development?</li> <li>Encourage and support diverse town centre uses?</li> </ul>	<ul style="list-style-type: none"> <li>Borough demographics – proportion of the population likely to need long-term care</li> <li>Changes to IMD (reductions in the most deprived and difference in the proportion of the highest to the lowest levels of deprivation) (the gaps between deprived areas should decrease)</li> </ul>
<i>Population Education</i>	<b>6. To improve levels of education and skills in the population overall</b>	<ul style="list-style-type: none"> <li>Support the provision of an adequate range of educational and child care facilities on where they are needed?</li> <li>Provide for new and improved education and training facilities leading to a work ready population of school and college leavers?</li> </ul>	<ul style="list-style-type: none"> <li>GCSE and equivalent results for young people (Department for Education)</li> <li>% of working age population with NVQ level 4+ or equivalent qualification (Census 2011 - QS501EW)</li> <li>Qualifications at all ages (this should increase)</li> </ul>
<b>Economic</b>			
<i>Population Economy Employment</i>	<b>7. To maintain Guildford borough and Guildford town's competitive economic role</b>	<ul style="list-style-type: none"> <li>Improve business development and enhance competitiveness?</li> <li>Encourage economic investment and regeneration to create jobs in Guildford's more deprived communities?</li> <li>Promote growth in key sectors?</li> <li>Make land available for business development?</li> <li>Increase the range of employment opportunities, shops and services available in town, district, local centres?</li> </ul>	<ul style="list-style-type: none"> <li>Estimated new job creation (ONS Business Register Employment Survey (BRES))</li> <li>Business formation rate (ONS) (business start-ups)</li> <li>Numbers employed by industry (ONS BRES)</li> <li>Percentage of A1 use class and vacant units in town/district/local centres (Council records)</li> </ul>

Page 337

Appendix 4  
Agenda item number: 9

SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
		<ul style="list-style-type: none"> <li>Will it decrease the number of vacant units in town, district, local centres?</li> </ul>	<ul style="list-style-type: none"> <li>Overall position / rank of the borough in the UK Competitiveness Index (this should increase)</li> <li>Overall position / rank of Guildford town in the UK Competitiveness Index (this should be maintained/improved)</li> </ul>
Population Economy Employment	<b>8. To facilitate appropriate development opportunities to meet the changing needs of the economy</b>	<ul style="list-style-type: none"> <li>Encourage the development of new businesses in new and growth sectors?</li> <li>Provide for the types of homes and cultural attractions that will attract and retain global talent?</li> <li>Allow for sufficient flexibility to respond to uncertainties and changing economic circumstances?</li> <li>Support the growth and creation of SMEs?</li> <li>Provide for the needs of the economy, especially local business?</li> </ul>	<ul style="list-style-type: none"> <li>Ratio of median salary in the borough compared to median national salary (NOMIS)</li> <li>Percentage of permitted and completed class B1a and B1b floorspace (Council records)</li> <li>Percentage of permitted and completed class B1c, B2 and B8 floorspace</li> </ul>
Population Economy Employment	<b>9. To enhance the borough's rural economy</b>	<ul style="list-style-type: none"> <li>Encourage rural diversification?</li> <li>Encourage indigenous business?</li> <li>Facilitate achievement of objectives set out in Rural Economic Strategy 2017 – 2022?</li> <li>Encourage inward investment?</li> </ul>	<ul style="list-style-type: none"> <li>Net change in floor space in rural areas (this should increase)</li> </ul>
Population Material assets	<b>10. To ensure that the digital infrastructure available meets the needs of current and future generations</b>	<ul style="list-style-type: none"> <li>Improve digital infrastructure provision?</li> <li>Will it increase opportunities to improve the digital economy?</li> </ul>	<ul style="list-style-type: none"> <li>Average broadband speed (OFCOM)</li> </ul>
<b>Environmental</b>			
Soil	<b>11. To minimise the use of best and most versatile agricultural land (BVAL) and encourage the remediation of contaminated land</b>	<ul style="list-style-type: none"> <li>Minimise loss of best and most versatile agricultural land to development?</li> <li>Maintain and enhance soil quality?</li> <li>Prevent land contamination and facilitate remediation of contaminated sites?</li> <li>Help to remediate contaminated sites and where possible carry this out on-site?</li> <li>Prevent soil erosion?</li> </ul>	<ul style="list-style-type: none"> <li>Number of potential and declared contaminated sites returned to beneficial use</li> <li>Change in recorded soil quality (EA)</li> </ul>
Material assets Waste	<b>12. To reduce waste generation and achieve</b>	<ul style="list-style-type: none"> <li>Promotes sustainable use of materials and natural resources?</li> <li>Reduce household waste generated/head of population?</li> </ul>	<ul style="list-style-type: none"> <li>Estimated household waste produced (Council records)</li> </ul>

Agenda item number: 9  
Appendix 4

Page 338

SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
<i>Soil</i>	<b>the sustainable management of waste and materials</b>	<ul style="list-style-type: none"> <li>Reduce construction and demolition waste</li> <li>Increase rate/head of population of waste reuse and recycling?</li> </ul>	<ul style="list-style-type: none"> <li>Estimated quantity of household waste recycled (Council records) (this should increase)</li> </ul>
<i>Materia assets Soil</i>	<b>13. To make the best use of previously developed land and existing buildings</b>	<ul style="list-style-type: none"> <li>Prioritise the development of brownfield land over greenfield land?</li> <li>Encourage the re-use of existing buildings?</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of development recorded on greenfield/brownfield land (Council records)</li> </ul>
<i>Biodiversity Flora Fauna</i>	<b>14. To conserve and enhance biodiversity, geodiversity and the natural environment</b>	<ul style="list-style-type: none"> <li>Maintain and enhance International and national nature conservation sites?</li> <li>Maintain and enhance locally designated biodiversity assets, taking into account the impacts of climate change?</li> <li>Maintain and enhance ancient woodlands, meadows and other characteristic habitats, taking into account the impacts of climate change?</li> <li>Achieve overall measurable net gains in biodiversity?</li> <li>Conserve, connect and enhance ecological networks, taking into account the impacts of climate change?</li> <li>Protect, enhance or extend designated geological sites?</li> <li>Assist species, particularly Surrey priority species, to adapt to the anticipated effects of climate change (i.e. through connecting habitats and/or improving greenspace)?</li> <li>Help to achieve goals set out in 25 Year Environment Plan<sup>27</sup> targets and actions of the Surrey Nature Partnership<sup>28</sup>?</li> </ul>	<ul style="list-style-type: none"> <li>Change in the number and area of designated ecological sites (NE)</li> <li>Change in the number and area of designated ecological sites (NE)</li> <li>Recorded status/condition of designated and local ecological sites (NE)</li> <li>Recorded visitor numbers on designated European sites (NE)</li> <li>Gains in biodiversity provided by development on sites of 25 homes or greater</li> <li>Net gains in biodiversity measured using Defra Biodiversity Metric 2.0.</li> <li>The amount of Green and Blue Infrastructure that is protected and provided within the borough</li> <li>Number of hectares of Priority Habitat created or enhanced</li> <li>Number of Biodiversity Opportunity Areas (BOA) objectives achieved.</li> </ul>
<i>Air Transport and accessibility</i>	<b>15. To encourage the use of sustainable forms of transport (walking, cycling, bus and rail)</b>	<ul style="list-style-type: none"> <li>Support the maintenance and expansion of high-quality public transport networks?</li> <li>Help to address road congestion, particularly involving HGVs on the routes into Guildford Town Centre?</li> <li>Enhance connectivity of the sustainable transport network and provide new cycling and walking infrastructure?</li> <li>Facilitate the take up of low/zero emission vehicles?</li> <li>Reduce air and noise pollution from traffic?</li> </ul>	<ul style="list-style-type: none"> <li>Percentage mode share for sustainable modes, defined as walking, cycling, bus, minibuss, coach and train, as methods of travel to work, for all usual residents aged 16 to 74 in employment in Guildford borough (using Census data) (this should increase)</li> <li>Developments with Travel Plans.</li> <li>Travel to work distances (Census)</li> <li>Travel to work modes (Census)</li> </ul>

Page 339

Agenda item number: 9  
Appendix 4

<sup>27</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>28</sup> [https://surreynaturepartnership.files.wordpress.com/2019/10/biodiversity-planning-in-surrey-revised\\_post-revision-nppf\\_mar-2019.pdf](https://surreynaturepartnership.files.wordpress.com/2019/10/biodiversity-planning-in-surrey-revised_post-revision-nppf_mar-2019.pdf)

SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
<i>Air</i>	<b>16. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure</b>	<ul style="list-style-type: none"> <li>• Help to achieve national and international standards for air quality?</li> <li>• Reduce the number of people exposed to levels of NO<sub>2</sub> concentrations that exceed 40µg/m<sup>3</sup>?</li> <li>• Avoid exacerbating existing air quality issues in designated AQMAs?</li> <li>• Contributes to achievement of targets and actions specified in Guildford Borough Council Air Quality Action Plan (AQAP) 2019?</li> </ul>	<ul style="list-style-type: none"> <li>• Concentrations of air pollutants</li> <li>• NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions from road transport (they should decrease)</li> <li>• Number of people exposed to levels of NO<sub>2</sub> concentrations that exceed 40µg/m<sup>3</sup> (this should decrease)</li> <li>• Number of AQMAs revoked (Council records)</li> <li>• Number of AQMAs declared</li> <li>• Number of targets and actions achieved in AQAP</li> </ul>
<i>Historic environment</i>	<b>17. To protect, enhance, and where appropriate make accessible, the archaeological and historic environments and cultural assets of Guildford, for the benefit of residents and visitors</b>	<ul style="list-style-type: none"> <li>• Protect and enhance buildings, monuments, sites, places, areas and landscapes of heritage interest or cultural value (including their setting) meriting consideration in planning decisions?</li> <li>• Protect and enhance sites, features and areas of archaeological value in both urban and rural areas?</li> <li>• Enhance accessibility to and the enjoyment of cultural heritage assets?</li> <li>• Provide opportunities to enhance the historic environment?</li> </ul>	<ul style="list-style-type: none"> <li>• Change in the number of designated and non-designated heritage assets (Historic England, Council records)</li> <li>• Number of heritage assets recorded as 'at risk' (Historic England, Council records)</li> <li>• Area of historic parks and gardens</li> <li>• Number of Scheduled Monuments (SMs) damaged as a result of development</li> <li>• Number of listed buildings and buildings at risk</li> </ul>
<i>Climatic factors</i>	<b>18. To mitigate the causes of climate change through reducing emissions of greenhouse gases and efficient use of natural resources</b>	<ul style="list-style-type: none"> <li>• Promote energy efficient design?</li> <li>• Reduces CO<sub>2</sub> emissions from buildings?</li> <li>• Reduce energy consumption?</li> <li>• Encourage the provision of renewable energy infrastructure where possible?</li> <li>• Minimise greenhouse gas emissions from transport?</li> </ul>	<ul style="list-style-type: none"> <li>• Average energy consumption/carbon emissions per household (reduction in energy consumption/emissions to reach UK average)</li> <li>• MWs of installed small scale low and zero carbon energy capacity (Council records) (increase in capacity to reach UK average)</li> <li>• Low and zero carbon decentralised energy networks (this should increase)</li> </ul>
<i>Climatic factors</i>	<b>19. To build resilience and adapt to the impacts of climate change and extreme weather events such as flood, drought and heat risks particularly on groups more vulnerable to the effects of climate change</b>	<ul style="list-style-type: none"> <li>• Minimise the impact of overheating of urban areas and buildings, with particular references to buildings designed for vulnerable users such as hospitals, elderly care homes and schools?</li> <li>• Help in protecting the community from the increased extremes of weather, which are projected to occur more often with climate change (heat waves, drought and flooding)?</li> </ul>	<ul style="list-style-type: none"> <li>• Number of developments with measures to address overheating</li> <li>• Number of planning application granting permission in flood risk areas against the EA advice</li> </ul>

Agenda item number: 9  
Appendix 4

SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
<i>Climatic factors</i>	<b>20. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</b>	<ul style="list-style-type: none"> <li>Minimise the risk of flooding from rivers and watercourses?</li> <li>Promote the use of SuDS and flood resilient design?</li> </ul>	<ul style="list-style-type: none"> <li>Number of planning applications approved in Flood Zone 3 and 2</li> <li>Number of major schemes incorporating SuDS mechanisms</li> </ul>
<i>Landscape</i>	<b>21. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes</b>	<ul style="list-style-type: none"> <li>Conserve and enhance the character of AONBs including its setting?</li> <li>Protect the special views into and out of Guildford town centre?</li> <li>Promote high quality design that responds to the distinctive local character?</li> <li>Safeguard the character and distinctiveness of Guildford's settlements?</li> </ul>	<ul style="list-style-type: none"> <li>Amount of new major development in the AONB on sites not allocated in the Plan (Council records)</li> </ul>
<i>Water</i>	<b>22. To maintain and improve the water quality of the borough's rivers and groundwater</b>	<ul style="list-style-type: none"> <li>Support the achievement of Water Framework Directive Targets?</li> <li>Maintain and improve ground water quality?</li> <li>Maintain and improve the quality of inland waters?</li> <li>Reduce the amount of nitrates / phosphates entering the water environment?</li> </ul>	<ul style="list-style-type: none"> <li>Ecological and chemical water quality of rivers, canals and freshwater bodies (these should improve) (EA)</li> <li>Quality and quantity of groundwater</li> <li>Number of planning applications, of a potentially contaminating nature within a Source Protection Zone (SPZ)</li> <li>Number of planning applications which require contaminated land remediation</li> </ul>
<i>Water</i>	<b>23. To achieve sustainable water resources management and water conservation</b>	<ul style="list-style-type: none"> <li>Encourage water to be stored for re-use?</li> <li>Promotes water conservation measures?</li> <li>Promote sustainable use of water?</li> <li>Maintain water availability of water dependent habitats?</li> </ul>	<ul style="list-style-type: none"> <li>Water cycle studies</li> <li>Abstraction license data</li> <li>Water use, availability and proportions recycled</li> </ul>

This page is intentionally left blank

# Guildford Local Plan Habitats Regulations Assessment

Local Plan Part 2: Development Management Policies  
Issues and Preferred Options Consultation

Guildford Borough Council

Project number: 60616479

March 2020

### Quality information

Prepared by	Checked by	Verified by	Approved by
Amelia Kent Senior Ecologist (ACIEEM)	James Riley CEnv MICEEM Technical Director	Max Wade CEnv MCIEEM Technical Director	James Riley CEnv MICEEM Technical Director

### Revision History

Revision	Revision date	Details	Authorized	Name	Position
0	13/03/20	Draft	JR	James Riley	Technical Director (HRA)
1	17/03/20	For issue	JR	James Riley	Technical Director (HRA)

### Distribution List

# Hard Copies	PDF Required	Association / Company Name



Prepared for:

Guildford Borough Council

Prepared by:

Amelia Kent  
Senior Ecologist (ACIEEM)

AECOM Limited  
Midpoint, Alencon Link  
Basingstoke  
Hampshire RG21 7PP  
United Kingdom

[aecom.com](http://aecom.com)

© 2020 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

## Table of Contents

1. Introduction.....	5
Scope of the Project .....	5
Legislation.....	5
Report Layout.....	6
2. Methodology .....	7
Introduction .....	7
A Proportionate Assessment.....	7
The Process of HRA.....	8
The Scope.....	10
The ‘in combination’ Scope.....	10
3. Pathways of Impact .....	12
Urbanisation.....	12
Recreational Pressure .....	12
Atmospheric Pollution.....	14
Water Quality and Resources .....	16
4. Test of Likely Significant Effects .....	19
5. In-combination Assessment .....	47
6. Conclusions.....	47
Appendix A European Site Background .....	49

## Figures

Figure 1: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT).....	16
Figure 2: Areas of water stress within England. It can be seen from this map that Surrey is classified as being an area of serious water stress (coded red). .....	17

## Tables

Table 1: Main sources and effects of air pollutants on habitats and species.....	14
Table 2. Likely Significant Effects of the Policies within the Guildford Local Plan Development Management Policies for Effects on Thames Basin Heaths SPA .....	20

# 1. Introduction

## Scope of the Project

- 1.1 Guildford Local Plan Part 1 was adopted in 2019. AECOM have been appointed to undertake the HRA of the Guildford Local Plan Part 2: Development Management Policies (LPP2). The objectives of this assessment are to:
  - Identify any aspects of the emerging LPP2 document that would have the potential to cause a likely significant effect on, or adverse effect on the integrity of, European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites), either in isolation or in combination with other plans and projects, and;
  - Advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.
- 1.2 The HRA of the Guildford LPP2 is required to determine if there are any realistic linking pathways present between a European site and the LPP2 and where Likely Significant Effects cannot be screened out, an analysis to inform Appropriate Assessment to be undertaken to determine if adverse effects on the integrity of the European sites will occur as a result of the Local Plan alone or in combination with other plans and projects.

## Legislation

- 1.1 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (**Box 1**). The ultimate aim of the Habitats Regulations is to “*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*”. This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status. European sites (also called Natura 2000 sites) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites.

### Box 1: The legislative basis for Appropriate Assessment

#### **Conservation of Habitats and Species Regulations 2017 (as amended)**

The Regulations state that:

*“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... must make an appropriate assessment of the implications for the plan or project in view of that site’s conservation objectives... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.”*

- 1.2 The Habitats Regulations applies the precautionary principle to European sites (SAC and SPA). As a matter of UK Government policy, Ramsar sites are given equivalent status. For the purposes of this assessment candidate SACs (cSACs), proposed SPAs (pSPAs) and proposed Ramsar (pRamsar) sites are all treated as fully designated sites. In this report we use the term “European sites” to refer collectively to the sites listed in this paragraph.
- 1.3 Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

- 1.4 In 2018, the ‘People Over Wind’ European Court of Justice (ECJ) ruling<sup>1</sup> determined that ‘mitigation’ (i.e. measures that are specifically introduced to avoid or reduce the harmful effects of a plan or project on European sites) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the appropriate assessment stage. Appropriate assessment is not a technical term: it simply means ‘an assessment that is appropriate’ for the plan or project in question. As such, the law purposely does not prescribe what it should consist of or how it should be presented; these are decisions to be made on a case by case basis by the competent authority. The UK is no longer part of the European Union and transitional arrangements will end in December 2020. However, for the purposes of this assessment it is assumed as a precaution that the UK courts may continue to consider existing ECJ rulings on HRA matters as useful jurisprudence even after this date.
- 1.5 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

## Report Layout

- 1.6 **Chapter 2** of this report explains the process by which the HRA has been carried out. **Chapter 3** explores the relevant pathways of impact. **Chapter 4** presents the Test of Likely Significant Effects of the policies and site allocations of the Plan considered ‘alone’ and ‘in-combination’. **Chapter 5** presents the conclusions.

---

<sup>1</sup> Case C-323/17

## 2. Methodology

### Introduction

- 2.1 This section sets out the approach and methodology for undertaking the Habitats Regulations Assessment (HRA). HRA itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument. Therefore, there is no direct relationship to the National Planning Policy Framework (NPPF) and the 'Tests of Soundness'.

### A Proportionate Assessment

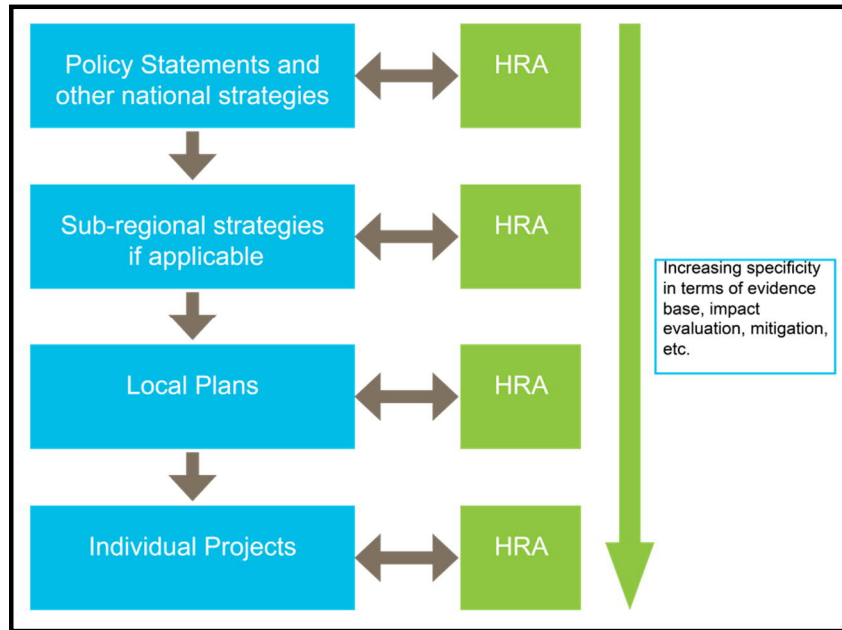
- 2.2 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.
- 2.3 However, the draft MHCLG guidance<sup>2</sup> (described in greater detail later in this chapter) makes it clear that when implementing HRA of land-use plans, the Appropriate Assessment (AA) should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:
- 2.4 *"The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project."*
- 2.5 More recently, the Court of Appeal<sup>3</sup> ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be "*achieved in practice*" then this would suffice to meet the requirements of the Habitat Regulations. This ruling has since been applied to a planning permission (rather than a Plan document)<sup>4</sup>. In this case the High Court ruled that for "*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations*".
- 2.6 In other words, there is a tacit acceptance that AA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers as illustrated in **Box 2**.

<sup>2</sup> MHCLG (2006) Planning for the Protection of European Sites, Consultation Paper

<sup>3</sup> No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17<sup>th</sup> February 2015

<sup>4</sup> High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

**Box 2: Tiering in HRA of Land Use Plans**



2.7 The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt (within the limits of reasonableness); it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon an internationally designated site unless it can be clearly established otherwise.

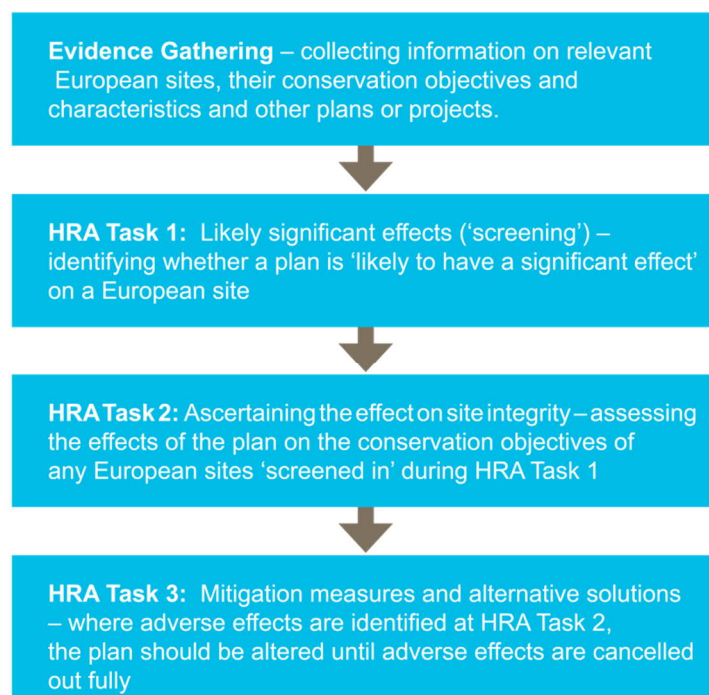
**The Process of HRA**

2.8 The HRA is being carried out in the continuing absence of formal central Government guidance. The former DCLG (now MHCLG) released a consultation paper on AA of Plans in 2006<sup>5</sup>. As yet, no further formal guidance has emerged from MHCLG on the assessment of plans. However, Natural England has produced its own informal internal guidance and central government have released general guidance on appropriate assessment<sup>6</sup>

2.9 **Box 3** outlines the stages of HRA according to the draft MHCLG guidance (which, as government guidance applicable to English authorities is considered to take precedence over other sources of guidance). The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no likely significant effects remain.

<sup>5</sup> MHCLG (2006) Planning for the Protection of European Sites, Consultation Paper  
<sup>6</sup> <https://www.gov.uk/guidance/appropriate-assessment>

### Box 3: Four-Stage Approach to Habitats Regulations Assessment



2.10 The following process has been adopted for carrying out the subsequent stages of the HRA.

### Task One: Test of Likely Significant Effect

2.11 The first stage of any Habitats Regulations Assessment is a test of Likely Significant Effect - essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

2.12 *“Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?”*

2.13 In evaluating significance, AECOM have relied on professional judgment and experience of working with the other local authorities on similar issues. The level of detail concerning developments that will be permitted under land use plans is rarely sufficient to make a detailed quantification of effects. Therefore, a precautionary approach has been taken (in the absence of more precise data) assuming as the default position that if a likely significant effect (LSE) cannot be confidently ruled out, then the assessment must be taken the next level of assessment Task Two: Appropriate Assessment. This is in line with the April 2018 court ruling relating to ‘People Over Wind’ where mitigation and avoidance measures are to be included at the next stage of assessment.

### Task Two: Appropriate Assessment

2.14 European Site(s) which have been ‘screened in’ during the previous Task have a detailed assessment undertaken on the effect of the policies on the European site(s) site integrity. Avoidance and mitigation measures to avoid adverse significant effects are taken into account or recommended where necessary.

2.15 As established by case law, ‘appropriate assessment’ is not a technical term; it simply means whatever further assessment is necessary to confirm whether there would be adverse effects on the integrity of any European sites that have not been dismissed at screening. Since it is not a technical term it has no firmly established methodology except that it essentially involves repeating the analysis for the likely significant effects stage, but to a greater level of detail on a

smaller number of policies and sites, this time with a view to determining if there would be adverse effects on integrity.

- 2.16 One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment takes any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).

## The Scope

- 2.17 There is no pre-defined guidance that dictates the physical scope of a HRA of a Local Plan. Therefore, in considering the physical scope of the assessment we were guided primarily by the identified impact pathways rather than by arbitrary 'zones'. Current guidance suggests that the following European sites be included in the scope of assessment:
- All sites within the Guildford Borough boundary; and
  - Other sites shown to be linked to development within the Borough boundary through a known 'pathway' (discussed below).
- 2.18 Briefly defined, pathways are routes by which a change in activity within the Local Plan area can lead to an effect upon a European site. In terms of the second category of European site listed above, DCLG guidance states that the AA should be '*proportionate to the geographical scope of the [plan policy]*' and that '*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*' (CLG, 2006, p.6).
- 2.19 There are two European sites which fall partially within Guildford Borough - the Thames Basin Heaths (TBH) Special Protected Area (SPA) and Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) (which overlaps with the SPA).
- 2.20 During HRA of previous stages of the new Local Plan, (detailed in separate reports) it was possible to conclude, in consultation with Natural England, that only the Thames Basin Heaths SPA required further consideration as the Guildford Local Plan and associated DPDs and SPDs are developed, primarily due to possible likely significant effects through recreational pressure, urbanisation and reduced air quality. This HRA report therefore focuses on that SPA.

## The 'in combination' Scope

- 2.21 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European designated site(s) in question.
- 2.22 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee<sup>7</sup> case.
- 2.23 For the purposes of this HRA, we have determined that the key other documents with a potential for in-combination effects are:
- Guildford Local Plan Part 1: Strategy and Sites (2015 – 2034) (Adopted April 2019)
  - Waverley Local Plan Part 1: Strategic Policies and Sites (Adopted February 2018)

---

<sup>7</sup> Waddenzee case (Case C-127/02, [2004] ECR-I 7405)



- Emerging Waverley Local Plan Part 2: Site Allocations and Development Management Policies (Preferred Options Stage)
- Emerging Surrey Heath Local Plan 2016 to 2032 (Consultation 2020)
- Emerging Woking Local Development Documents 2027
- Emerging Elmbridge Local Development Scheme 2019 – 2022 (Options Consultation)
- Emerging Mole Valley Local Plan (2018 – 2033) (Public Consultation)
- Rushmoor Local Plan to 2032 (Adopted February 2019)
- Guildford Thames Basin Heaths SPA Supplementary Planning Document (Adopted July 2017)
- Thames Water Revised Draft Water Resources Management Plan 2019 (October 2018)

## 3. Pathways of Impact

3.1 The following pathways of impact are considered relevant to the HRA of LPP2 as they were to LPP1:

- Urbanisation
- Recreational Pressure
- Atmospheric Pollution
- Water Quality and Resources

### Urbanisation

3.2 This impact is closely related to recreational pressure, in that they both result from increased populations within close proximity to sensitive sites. Urbanisation is considered separately as the detail of the impacts is distinct from the trampling, disturbance and dog-fouling that results specifically from recreational activity. The list of urbanisation impacts can be extensive, but core impacts can be singled out:

- *Increased fly-tipping* - Rubbish tipping is unsightly but the principle adverse ecological effect of tipping is the introduction of invasive alien species with garden waste. Garden waste results in the introduction of invasive aliens precisely because it is the 'troublesome and over-exuberant' garden plants that are typically thrown out<sup>8</sup>. Alien species may also be introduced deliberately or may be bird-sown from local gardens.
- *Cat predation* - A survey performed in 1997 indicated that nine million British cats brought home 92 million prey items over a five-month period<sup>9</sup>. A large proportion of domestic cats are found in urban situations, and increasing urbanisation is likely to lead to increased cat predation.

3.3 The most detailed consideration of the link between relative proximity of development to European sites and damage to interest features has been carried out with regard to the Thames Basin Heaths SPA.

3.4 After extensive research, Natural England and its partners produced a 'Delivery Plan' which made recommendations for accommodating development while also protecting the interest features of the European site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development. While the zones relating to recreational pressure expanded to 5km (as this was determined from visitor surveys to be the principal recreational catchment for this European site), that concerning other aspects of urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats, but also including recreational pressure, fly tipping, increased incidence of fires and general urbanisation) was determined at 400m from the SPA boundary. The delivery plan concluded that the adverse effects of any development located within 400m of the SPA boundary could not be mitigated, in part because this was the range within cats could be expected to roam as a matter of routine and there was no realistic way of restricting their movements, and as such, no new housing should be located within this zone.

3.5 Guildford Council is a participatory organisation within the Thames Basin Heaths SPA Delivery Plan, including the prohibition on net new housing within 400m of the SPA.

### Recreational Pressure

3.6 Consultation for the HRA of the South East Plan (now revoked, but with the exception of Policy NRM6 that seeks to protect the Thames Basin Heaths SPA) revealed that potentially damaging

---

<sup>8</sup> Gilbert, O. & Bevan, D. 1997. The effect of urbanisation on ancient woodlands. *British Wildlife* 8: 213-218.

<sup>9</sup> Woods, M. et al. 2003. Predation of wildlife by domestic cats *Felis catus* in Great Britain. *Mammal Review* 33, 2 174-188

levels of recreational pressure are already faced by many European sites. Recreational use of a site has the potential to:

- Cause disturbance to sensitive species, particularly ground-nesting birds such as woodlark and nightjar, and wintering wildfowl;
- Prevent appropriate management or exacerbate existing management difficulties;
- Cause damage through erosion; and
- Cause eutrophication as a result of dog fouling.

3.7 Different types of European sites (e.g. heathland, chalk grassland) are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

3.8 The effects of recreation on heathland sites have been described in a series of English Nature Research Reports<sup>10</sup>. It would appear that recreational pressure can have a significant adverse effect on the Annex 1 bird species for which the SPAs in this area are designated. Disturbance can have an adverse effect in various ways, with increased nest predation by natural predators as a result of adults being flushed from the nest and deterred from returning to it by the presence of people and dogs likely to be a particular problem. A literature review on the effects of human disturbance on bird breeding found that 36 out of 40 studies reported reduced breeding success as a consequence of disturbance<sup>11</sup>. The main reasons given for the reduction in breeding success were nest abandonment and increased predation of eggs or young. Over years, studies of other species have shown that birds nest at lower densities in disturbed areas, particularly when there is weekday as well as weekend pressure<sup>12</sup>.

3.9 A number of studies have shown that birds are affected more by dogs and people with dogs than by people alone, with birds flushing more readily, more frequently, at greater distances and for longer (Underhill-Day, 2005). In addition, dogs, rather than people, tend to be the cause of many management difficulties, notably by worrying grazing animals, and can cause eutrophication near paths. Nutrient-poor habitats such as heathland are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces<sup>13</sup>.

3.10 Underhill-Day (2005) summarises the results of visitor studies that have collected data on the use of semi-natural habitat by dogs. In surveys where 100 observations or more were reported, the mean percentage of visitors who were accompanied by dogs was 54.0%.

3.11 However these studies need to be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their population<sup>14</sup>. A recent literature review undertaken for the RSPB<sup>15</sup> also urges caution when

---

<sup>10</sup> Liley, D. and R.T. Clarke (2002) – Urban development adjacent to heathland sites in Dorset: the effect on the density and settlement patterns of Annex 1 bird species. *English Nature Research Reports*, No. 463.

Murison, G. (2002) – The impact of human disturbance on the breeding success of nightjar *Caprimulgus europaeus* on heathlands in south Dorset, England. *English Nature Research Reports*, No. 483.

Land Use Consultants (2005) – Going, going, gone? The cumulative impact of land development on biodiversity in England. *English Nature Research Reports*, No. 626.

Rose, R.J. and R.T. Clarke (2005) – Urban impacts on Dorset Heathlands: Analysis of the heathland visitor questionnaire survey and heathland fires incidence data sets. *English Nature Research Reports*, No. 624.

Tyldesley, D. and associates (2005) – Urban impacts on Dorset heaths: A review of authoritative planning and related decisions. *English Nature Research Reports*, No. 622.

Underhill-Day, J.C. (2005) – A literature review of urban effects on lowland heaths and their wildlife. *English Nature Research Reports*, No. 623.

<sup>11</sup> Hockin, D., M. Oundsted, M. Gorman, D. Hill, V. Keller and M.A. Barker (1992) – Examination of the effects of disturbance on birds with reference to its importance in ecological assessments. *Journal of Environmental Management*, **36**, 253-286.

<sup>12</sup> Van der Zande, A.N., J.C. Berkhuizen, H.C. van Letesteyn, W.J. ter Keurs and A.J. Poppelaars (1984) – Impact of outdoor recreation on the density of a number of breeding bird species in woods adjacent to urban residential areas. *Biological Conservation*, **30**, 1-39.

<sup>13</sup> Shaw, P.J.A., K. Lankey and S.A. Hollingham (1995) – Impacts of trampling and dog fouling on vegetation and soil conditions on Headley Heath. *The London Naturalist*, **74**, 77-82.

<sup>14</sup> Gill et al. (2001) - Why behavioural responses may not reflect the population consequences of human disturbance. *Biological Conservation*, **97**, 265-268

<sup>15</sup> Woodfield & Langston (2004) - Literature review on the impact on bird population of disturbance due to human access on foot. *RSPB research report* No. 9.

extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to local environmental conditions. These facts have to be taken into account when attempting to predict the impacts of future recreational pressure on European sites.

- 3.12 It should be emphasised that recreational use is not inevitably a problem. Many European sites are also National Nature Reserves (e.g. Thursley Common) or nature reserves managed by wildlife trusts and the RSPB. At these sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.
- 3.13 Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered.

## Thames Basin Heaths SPA

- 3.14 In 2005, a visitor assessment of the Thames Basin Heaths SPA<sup>16</sup> determined that the majority of visitors travel by car and drive relatively short distances (less than 5km). This helped determine that any new residential development within 5km of the SPA could result in likely significant effects upon the SPA. To ensure development within Guildford did not result in likely significant effects upon the Thames Basin Heaths SPA, the Council produced a Thames Basin Heaths SPA avoidance strategy which forms the basis of planning guidance in relation to new residential development and its impact upon the SPA. The current iteration of the Council's avoidance strategy is the Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 SPD (adopted in July 2017).

## Atmospheric Pollution

- 3.15 The main pollutants of concern for European sites are oxides of nitrogen (NO<sub>x</sub>), ammonia (NH<sub>3</sub>) and sulphur dioxide (SO<sub>2</sub>). NO<sub>x</sub> can have a directly toxic effect upon vegetation. In addition, greater NO<sub>x</sub> or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

**Table 1: Main sources and effects of air pollutants on habitats and species**

Pollutant	Source	Effects on habitats and species
Acid deposition	SO <sub>2</sub> , NO <sub>x</sub> and ammonia all contribute to acid deposition. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased nitrogen emissions may cancel out any gains produced by reduced sulphur levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH <sub>3</sub> )	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants such as the products of SO <sub>2</sub> and NO <sub>x</sub> emissions to produce fine ammonium (NH <sub>4</sub> <sup>+</sup> ) containing aerosol which may be transferred much longer distances (can therefore be a significant trans-boundary issue.)	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH <sub>3</sub> is rapidly deposited, some of the most acute problems of NH <sub>3</sub> deposition are for small relict nature reserves located in intensive agricultural landscapes.

<sup>16</sup> Liley, D, Jackson, D. & Underhill-Day, J. (2005). Visitor Access Patterns on the Thames Basin Heaths. English Nature Research Report 682. English Nature, Peterborough

<p>Nitrogen oxides NO<sub>x</sub></p>	<p>Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations.</p>	<p>Deposition of nitrogen compounds (nitrates (NO<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>) and nitric acid (HNO<sub>3</sub>)) can lead to both soil and freshwater acidification. In addition, NO<sub>x</sub> can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.</p>
<p>Nitrogen (N) deposition</p>	<p>The pollutants that contribute to nitrogen deposition derive mainly from NO<sub>x</sub> and NH<sub>3</sub> emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.</p>	<p>Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.</p>
<p>Ozone (O<sub>3</sub>)</p>	<p>A secondary pollutant generated by photochemical reactions from NO<sub>x</sub> and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.</p>	<p>Concentrations of O<sub>3</sub> above 40 ppb can be toxic to humans and wildlife, and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.</p>
<p>Sulphur Dioxide SO<sub>2</sub></p>	<p>Main sources of SO<sub>2</sub> emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO<sub>2</sub> emissions have decreased substantially in the UK since the 1980s.</p>	<p>Wet and dry deposition of SO<sub>2</sub> acidifies soils and freshwater and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.</p>

3.16 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO<sub>2</sub> or NH<sub>3</sub> emissions will be associated with Local Plans. NO<sub>x</sub> emissions, however, are dominated by the output of vehicle exhausts. Within a 'typical' housing development, by far the largest contribution to NO<sub>x</sub> (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison<sup>17</sup>. Emissions of NO<sub>x</sub> could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the LDF.

3.17 According to the World Health Organisation, the critical NO<sub>x</sub> concentration (critical threshold) for the protection of vegetation is 30 µgm<sup>-3</sup>; the threshold for sulphur dioxide is 20 µgm<sup>-3</sup>. In addition,

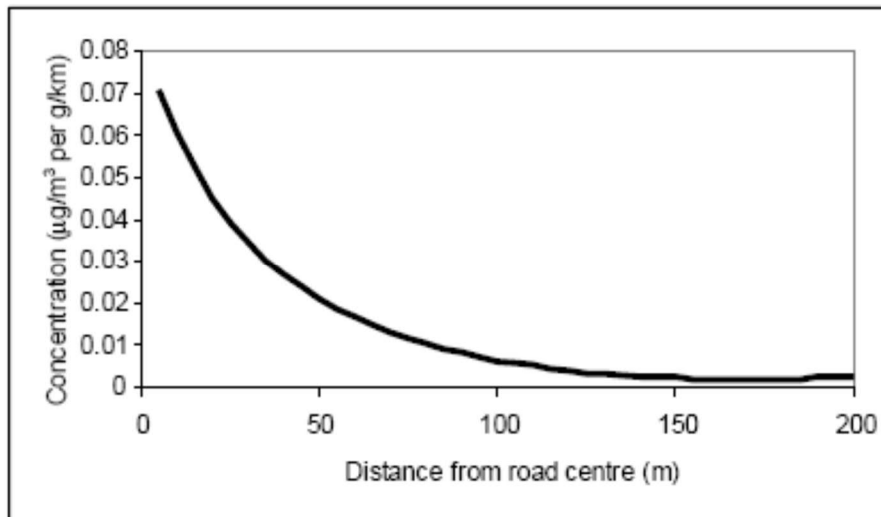
<sup>17</sup> Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

ecological studies have determined 'Critical Loads'<sup>18</sup> of atmospheric nitrogen deposition (that is, NO<sub>x</sub> combined with ammonia NH<sub>3</sub>) for key habitats within European sites.

## Local Air Pollution

3.18 According to the Department of Transport's Transport Analysis Guidance, "Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant"<sup>19</sup>.

Figure 1: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)



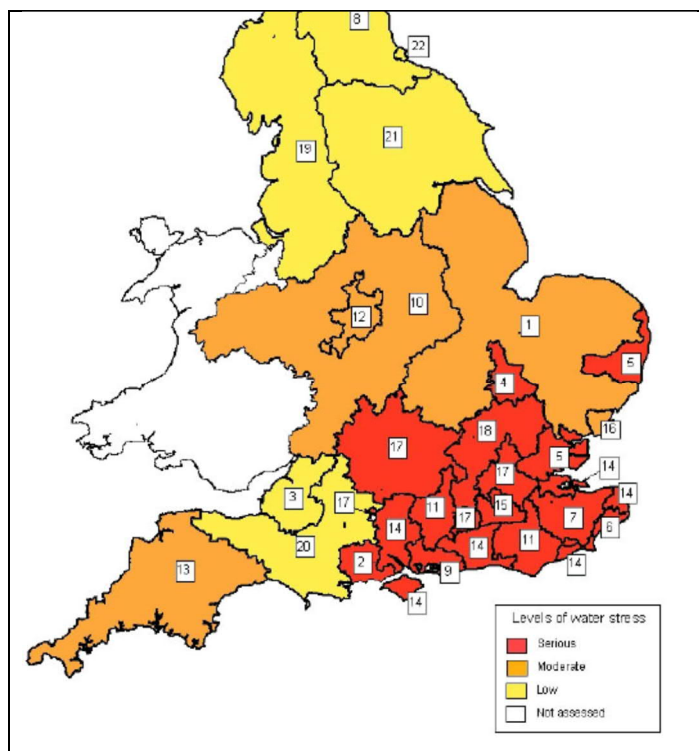
## Water Quality and Resources

### Water Abstraction

3.19 The South East is generally an area of high water-stress (see **Figure 2**).

<sup>18</sup> The Critical Load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

<sup>19</sup> [www.webtag.org.uk/archive/feb04/pdf/feb04-333.pdf](http://www.webtag.org.uk/archive/feb04/pdf/feb04-333.pdf)



**Figure 2: Areas of water stress within England. It can be seen from this map that Surrey is classified as being an area of serious water stress (coded red).**

- 3.20 Development within Guildford Borough over the plan period will increase water demand.
- 3.21 According to the Wey Catchment Abstraction Management Strategy Guildford Borough lies within several Water Resource Management Units:
- Cranleigh Waters;
  - Tillingbourne;
  - Guildford
  - Hoe Stream; and
  - Weybridge
- 3.22 Guildford borough lies within Thames Water’s Guildford Water Resource Zone. According to the revised draft Water Resource Management Plan (2019) this water resource zone is calculated to be in surplus over the entire plan period under normal conditions but may have deficits under peak demand. Thames Water intends to extend their water efficiency, leakage reduction and metering programmes into the zone in order to conserve resources. Affinity Water have also identified the need to employ measures to ensure sustainable supply in their ‘Wey’ Water Resource Zone, as have South East Water in their WRZ4 and WRZ5, which extend east of Aldershot. The determination of surplus or deficit does take account of environmental limits and the implication is that there should be no requirement for damaging levels of abstraction from any of the aquifers connected to these European sites.

## Water Quality

- 3.23 Development within Guildford Borough over the plan period will increase wastewater production. Wastewater from the District is treated by Thames Water and discharges to the River Wey or River Blackwater, which ultimately drains to the River Thames. Neither of these rivers are European sites.
- 3.24 Research carried out by the Environment Agency has indicated that future sewage treatment capacity at Guildford sewage treatment works can be rendered adequate to deal with projected growth, at least to 2026 given relatively small capital cost<sup>20</sup> and will therefore not have an adverse

<sup>20</sup> Environment Agency. May 2006. Creating a Better Place: Planning for Water Quality and Growth in the South East.

effect upon receiving waters. Additionally, Guildford Council commissioned a bespoke Water Quality Assessment to support the development of the Local Plan<sup>21</sup>. Stage 2 of the assessment (October 2017) concluded that feasible solutions were possible to ensure environmental conditions and legislative objectives are met relating to water quality.

---

<sup>21</sup> Water Quality Assessment <https://www.guildford.gov.uk/newlocalplan/infrastructureanddelivery>



## 4. Test of Likely Significant Effects

- 4.1 The Guildford Local Plan Part 2: Development Management Policies Issues and Preferred Options Consultation Document has been subjected to HRA screening for likely significant effects both alone and in combination. Each issue and preferred option has been considered. The purpose of the likely significant effects screening is to determine whether any of the preferred options could result in a likely significant effect on any European designated sites in view of those sites conservation objectives either alone or in combination with other plans and projects.

**Table 2. Likely Significant Effects of the Policies within the Guildford Local Plan Development Management Policies for Effects on Thames Basin Heaths SPA**

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy H4: Housing density	<p>The aim of this policy is to enable appropriate residential densities in high quality design-led schemes by having a policy that requires:</p> <ol style="list-style-type: none"> <li>1) Maximising the optimal use of land by building homes at the most appropriate density taking into account:                             <ol style="list-style-type: none"> <li>a) the site size, characteristics and location,</li> <li>b) the urban grain of the area and appropriate building forms and sizes for the site, and</li> <li>c) the context and local character of the area.</li> </ol> </li> <li>2) Higher density development in the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges, unless there are strong reasons why it would be inappropriate.</li> </ol>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy regarding residential densities. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>
Policy H5: Housing extensions and alterations	<p>The aim of this policy is to achieve high-quality design for extensions and alterations by having a policy that addresses the following issues:</p> <ol style="list-style-type: none"> <li>1) Requiring residential extension and alteration schemes to have regard to the impact on the streetscene, neighbours and the existing property such that they:                             <ol style="list-style-type: none"> <li>a) respect the existing context, scale and character of the adjacent buildings and immediate surrounding area,</li> <li>b) have no unacceptable impact on the amenities enjoyed by the occupants of adjacent buildings in terms of privacy and access to sunlight and daylight, and</li> <li>c) are consistent with the form, scale, character and proportion of the existing building.</li> </ol> </li> </ol> <p><b>Basement extensions</b></p> <ol style="list-style-type: none"> <li>2) Proposals for basement extensions are required to:                             <ol style="list-style-type: none"> <li>a) be well-designed, proportionate and ensure that their potential impact on the local environment, trees, tree roots, garden area, architectural character of the property, neighbouring properties and residential amenity is acceptable, and</li> <li>b) have no adverse impact on local ground water conditions, flooding or drainage issues.</li> </ol> <p>Applications involving the formation of a basement are expected to include a structural impact report and this will be a requirement for the Local Validation List. The report should show that there is no adverse impact to land and the structural stability of the application site and adjacent properties.</p> </li> </ol> <p><b>Annexes</b></p> <ol style="list-style-type: none"> <li>3) Development of a residential annex will be permitted if:                             <ol style="list-style-type: none"> <li>a) it is an extension that would be subordinate in scale to the main residence,</li> <li>b) it is fully integrated into the main dwelling house unless it is an outbuilding,</li> </ol> </li> </ol>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy setting out the criteria by which extensions will be deemed acceptable. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>

Agenda item number: 9  
Appendix 5

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>c) it clearly and unequivocally shares either bathroom or kitchen facilities with the main dwelling house,</li> <li>d) it cannot be used as a self-contained dwelling, and</li> <li>e) it would share the vehicular access and garden area.</li> </ul> <p>All residential extensions are expected to have regard to the Guildford Borough Council Residential Extensions and Alterations SPD 2018 or any document which replaces it.</p>	
Policy H6: Housing conversion and sub-division	<p>The aim of this policy is to achieve high-quality conversions and sub-divisions by having a policy that addresses the following issues:</p> <p><b>Subdivisions and conversions</b></p> <ul style="list-style-type: none"> <li>1) Development involving the conversion of dwellings into flats, studios or bedsits will be supported provided that: <ul style="list-style-type: none"> <li>a) the balance of housing types and character of the immediate locality would not be adversely affected; and</li> <li>b) there is sufficient amenity space available; and</li> <li>c) it would not be detrimental to the amenity of neighbouring residents.</li> </ul> </li> </ul>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy setting out criteria for allowing conversions and sub-divisions. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>
Policy E10: Rural development (including agricultural diversification)	<p>The preferred option is to support the development of the rural economy by means of a policy that clarifies the types of new buildings or changes of use of buildings and land that the Council would consider acceptable in principle, subject to any proposal falling within the exceptions listed in paragraph 145 (a) to (g) of the NPPF for sites in the Green Belt, or meeting the requirement of policy P3 (1) of the Local Plan: Strategy and Sites<sup>22</sup> for non-Green Belt sites.</p> <p><b>Green Belt</b></p> <p>Within the Green Belt, the policy might support the following proposed forms of rural development, provided that any proposal falls within the exceptions listed in paragraphs 145 and 146 of the NPPF:</p> <ul style="list-style-type: none"> <li>1) New appropriate facilities for small-scale outdoor sport or outdoor recreation, such as a sports pavilion or clubhouse, or a small-scale building within a farm holding to accommodate outdoor recreational facilities such as an animal petting area.</li> <li>2) Conversion of vacant or redundant agricultural buildings to small-scale business, or recreational uses.</li> </ul> <p><b>Countryside</b></p> <p>Within the area of countryside, as designated on the Policies Map, the policy could support development of the following new uses in principle, provided they respect the area's local character:</p>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy which sets out conditions for rural development. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>

<sup>22</sup> To accord with LPSS policy P3 (1) they would need to require or justify a countryside/rural location, be in proportion to the site's scale and setting and not increase physical or visual coalescence between the existing urban area and villages around Ash and Tongham.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>1) Farm shops (provided they support the farm’s agricultural operations and are operated as part of the farm holding)</p> <p>2) Other farm diversification proposals, for example activity centres and arts and craft shops</p> <p>3) Tourist accommodation</p> <p>4) Small-scale rural tourism attractions</p> <p>5) Small-scale leisure facilities</p> <p>6) Horticultural nurseries and other small-scale business enterprises</p> <p>New buildings in the countryside should be clustered together where possible to reduce their visual impact on the character of the countryside and any built features should avoid harm to the local environment or residential amenity (particularly through noise).</p> <p><b>Non-agricultural uses within farm holdings</b></p> <p>New buildings, or proposed changes of use of existing buildings, within a farm holding that are to be used for non-agricultural uses will be required to be operated as part of the farm holding and support the farm’s agricultural operation.</p> <p>The Council will require adequate space to be made available within the curtilage of any building within a farm holding proposed for a farm shop or other non-agricultural use to allow for staff and visitor parking without detriment to the visual amenity of the countryside.</p> <p>If permission is granted for a farm shop, the Council may apply conditions to limit the overall scale of the development and require that any goods for sale that are not produced locally remain ancillary to the sale of local produce.</p> <p>*See Definitions.</p>	
<p>Policy E11: Horse related development</p>	<p>To have a policy that supports small-scale horse or other equine-related development if:</p> <p>1) adequate land is available for the proper care of the animals, including stabling, grazing and exercise, having regard to the latest Government-published standards; and</p> <p>2) the applicant demonstrates that the proposed development would:</p> <p>a) have no adverse effect on the nature conservation or biodiversity value of the site;</p> <p>b) re-use existing buildings where feasible, or, in the case of a new facility, be satisfactorily integrated with existing buildings;</p> <p>c) be acceptable in terms of impact on landscape character.</p> <p>d) not have a significant detrimental effect on the amenity of neighbouring or nearby properties by reason of noise, smell, overlooking, or other general disturbance</p> <p>Particular consideration will be given to the cumulative adverse effects of proposals in the vicinity of the proposed site and the wider area.</p> <p><b>Larger-scale developments</b></p>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy does not provide for a quantum of development. All horse-related development would be subject to the provisions of Policy P5 in adopted LPP1 which states that ‘<i>Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development</i>’.</p> <p>It is recommended a slight wording alteration to the policy to provide clarity that all European sites should be protected. E.g. wording should be changed to “have no adverse effect</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>3) Proposals for larger-scale equine-related development will be expected to meet the criteria above. In addition, for developments likely to attract large numbers of visitors, a transport assessment will be required to be undertaken to show that there will be no unacceptable impacts on highway safety and that the safety of horses, riders and other road users will not be compromised.</p>	<p>on nature conservation or biodiversity value” without “of the site”.</p> <p>No linking impact pathways.</p>
<p>Policy P6: Biodiversity in new developments</p>	<p>The aim of this policy is to maximise biodiversity gains in all new developments, (including those exempt from biodiversity net gains - see policy P7), by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Requires new developments to prioritise biodiversity in their proposals as a general principle.</li> <li>2) Requires developments within or adjacent to a BOA to support the achievement of the objectives of the BOA as set out in the relevant BOA Policy Statement<sup>23</sup> and requires them to protect the designated and priority habitats and species in the BOA and improve habitat connectivity across the BOA.</li> <li>3) Expects proposals to be guided by other national, regional and local biodiversity strategies. The Green and Blue Infrastructure SPD will signpost and map the relevant strategies to help inform planning proposals.</li> </ol> <p><b>Planting schemes and landscaping</b></p> <ol style="list-style-type: none"> <li>4) Requires proposals to maximise biodiversity gain in planting and landscaping schemes by choosing species, habitats and management regimes that provide best biodiversity benefit as set out in BOA policy statements and other strategies.</li> <li>5) Tree canopies are expected to be retained and new tree planting is expected to focus on the creation of new connected tree canopies or the extension of existing canopies. Tree planting schemes should provide resilience in terms of climate, disease and ageing, planting large species with long lifespans where opportunities arise. It is expected that UK sourced native species will be used, unless imported strains would offer greater resilience.</li> </ol> <p><b>Measures on building structures</b></p> <ol style="list-style-type: none"> <li>6) Requires schemes to include features in or on building structures that support wildlife wherever possible, including integrated nesting boxes and green roofs and walls that will last for the lifetime of the development and cater for appropriate species and habitats.</li> </ol> <p><b>Site design</b></p> <ol style="list-style-type: none"> <li>7) Expects schemes to take opportunities to create new areas of habitat and provide appropriate links between existing habitats, avoiding and reversing fragmentation and species isolation. Built features are expected to be permeable for wildlife. Where invasive species are present, site design should not facilitate their spread.</li> <li>8) Expects major schemes to include measures that encourage a sense of community ownership of green spaces.</li> </ol>	<p>No Likely Significant Effect</p> <p>This policy is a positive design/development management policy, providing for greater biodiversity in new developments. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

<sup>23</sup> SyNP (2019) Biodiversity Working Group. [Online]. Available online at <https://surreynaturepartnership.org.uk/our-work/>.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p><b>Sites that include or are adjacent to sensitive habitats</b></p> <p>9) Where sites contain or are adjacent to sensitive habitats, appropriate buffers and, where necessary, barriers should 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 should take account of the potential impacts on wildlife.</p> <p>10) Development that contains or is adjacent to a watercourse should retain or provide an appropriate buffer between built development (including parking areas, private gardens and landscaping) and the watercourse, composed of natural or semi-natural habitat.</p>	
<p>Policy P7: Biodiversity net gain</p>	<p>The aim is to provide clarity and detail for the requirement for developments to aim to achieve biodiversity net gain set out in policy ID4 through a policy that:</p> <ol style="list-style-type: none"> <li>1) Clarifies that net gain means a minimum gain of 20 per cent. Major developments are required to follow Defra's net gain calculation methodology 'Defra Biodiversity Metric 2.0' and submit a completed spreadsheet with the planning application. Minor developments are required to follow the simplified version of the metric.</li> <li>2) Clarifies that biodiversity net gain is required on all sites except previously developed sites, unless the previously developed sites support at least one protected or priority species population or habitat, or an assemblage of species with an otherwise demonstrably high biodiversity value<sup>24</sup>.</li> <li>3) Clarifies that proposals for net gain should be delivered in a manner that is consistent with policies P6 and ID4 so that measures are focused on local priorities and will provide best value.</li> <li>4) Ensures development follows the mitigation hierarchy by:             <ol style="list-style-type: none"> <li>a) Avoiding impacts on biodiversity as far as possible.</li> <li>b) Where an impact cannot be avoided, the impact is minimised as far as possible.</li> <li>c) Where habitats are adversely impacted, they are restored or rehabilitated.</li> <li>d) Where impacted habitats cannot be wholly restored or rehabilitated, compensation measures are used, including off-site provision in the locality of the development line with the emerging national approach.</li> </ol> </li> <li>5) Requires new habitats delivered under biodiversity net gains to be secured and maintained for at least 30 years.</li> <li>6) Where the applicant is unable to provide the gains on-site or off-site, the Council will seek a financial contribution to fund habitat measures if suitable land is available.</li> <li>7) Supports applications for change of use in order to create biodiversity sites in appropriate locations, including biodiversity offsetting sites and sites within Local Nature Recovery Strategies.</li> </ol>	<p>No Likely Significant Effect</p> <p>This policy is a positive design/development management policy, providing for greater inclusion of biodiversity net gain. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Agenda item number: 9  
Appendix 5

Page 366

<sup>24</sup> For example, identified through Natural England's Species Status project. See <http://publications.naturalengland.org.uk/category/4707656804597760> and <http://archive.jncc.gov.uk/default.aspx?page=3352>).

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy P8: Woodland, trees, hedgerows and irreplaceable habitats	<p>The aim of this policy is to protect important woodlands, trees, hedgerows and irreplaceable habitats by having a policy that includes the following measures:</p> <ol style="list-style-type: none"> <li>1) Habitats will be considered to be irreplaceable where they meet the definition in the NPPF glossary or are identified as such in documents published by the Surrey Nature Partnership. They include, but are not limited to, the following habitats:               <ol style="list-style-type: none"> <li>a) ancient woodland,</li> <li>b) ancient or veteran trees,</li> <li>c) ancient wood pasture and historic parkland (including the open space between trees),</li> <li>d) unimproved grassland,</li> <li>e) wet heathland and bogs, and</li> <li>f) important hedgerows<sup>25</sup> and ancient hedgerows.</li> </ol> </li> <li>2) Irreplaceable habitats will be protected. Development resulting in the loss, damage or deterioration of irreplaceable habitats, including those listed in paragraph 1, will be refused, unless 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. Compensation will not form part of this assessment. However, a suitable compensation strategy that delivers appropriate levels of biodiversity gains will be required if irreplaceable habitats are harmed or lost.</li> <li>3) Planning proposals should set out clearly any likely impacts on irreplaceable habitats and, where necessary, appropriate and proportionate (in terms of quality and quantity to address the level of harm predicted) compensation.</li> <li>4) Where ancient woodland falls within or adjacent to a development site, the following measures are required:               <ol style="list-style-type: none"> <li>a) The application should be accompanied by information setting out the location of all significant ancient or veteran trees (a BS5837 Survey).</li> <li>b) An appropriate buffer around the ancient woodland of a minimum of 15 metres.</li> <li>c) There should be a clear separation between the woodland and the rest of the development, delineated by a physical feature such as a cycle lane, path or road.</li> </ol> </li> <li>5) Site design is expected to incorporate significant trees plus their root structures and understory within the public realm (including ancient and veteran trees and ancient woodland),</li> </ol>	<p>No Likely Significant Effect</p> <p>This policy is a positive design/development management policy, protecting irreplaceable habitats such as ancient woodland. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
Policy P9: Priority species and habitats on undesignated sites	<p>The aim of this policy is to protect species and habitats that are not covered by Policy ID4 (which protects designated sites) by having a policy that:</p>	<p>No Likely Significant Effect</p> <p>This policy is a positive design/development management policy, protecting priority species and habitats on</p>

<sup>25</sup> Defined under the Hedgerows Regulations 1997.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<ol style="list-style-type: none"> <li>1) Requires proposals for development on or adjacent to sites where there is a priority species or habitat to preserve and enhance the relevant ecological features. Priority species and habitats include:                             <ol style="list-style-type: none"> <li>a) species and habitats protected by law,</li> <li>b) priority habitats and species identified in strategies produced by the Surrey Nature Partnership and Natural England,</li> <li>c) habitats sites, wildlife corridors and stepping stones identified by the Surrey Nature Partnership and in Development Plan Documents and SPDs, by Natural England and in the NPPF, and</li> <li>d) sites identified as compensatory habitat sites on the habitat register.</li> </ol> </li> <li>2) The mitigation hierarchy should be applied, with avoidance of harm prioritised as the first step, followed by minimisation of harm, restoration and finally compensation as a last resort.</li> </ol>	<p>undesignated land. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
<p>Policy P10: Contaminated Land</p>	<p>The aims of this policy could be secured by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Supports the development of land that is known or suspected to be contaminated, including land which is suspected to be affected by contamination from adjacent land, but requires that:                             <ol style="list-style-type: none"> <li>a) the full nature and extent of contamination is established through suitable assessments; clarifying that site investigations, risk assessment, remediation and associated works are to be carried out to industry best practice guidelines at the time of application<sup>26</sup>,</li> <li>b) where evidence of contamination exists, the land is made fit for its intended purpose and avoids unacceptable harm to sensitive receptors through remediation and the design and layout of the development, avoiding creating or maintaining linkages between sources of contamination and sensitive receptors,</li> <li>c) appropriate remedial measures are included to prevent risk to future users of the site, the surrounding area and the environment (including water supplies and aquifers),</li> <li>d) prior to either occupation or use, a 'Verification Report' is submitted to the Council that demonstrates the agreed remediation measures have been implemented effectively.</li> </ol> </li> </ol>	<p>No Likely Significant Effect</p> <p>This is a design/development management policy setting out remediation requirements for contaminated land. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
<p>Policy P11: Air quality and air quality management areas</p>	<p>The aim of this policy is to reduce exposure to poor air quality across the borough and improve levels of air pollutants in Air Quality Management Areas (AQMA) and surrounds by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Will only permit development where it will not give rise to adverse impacts on health and quality of life from air pollution. 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.</li> </ol>	<p>No Likely Significant Effect</p> <p>This is a positive design/development management policy regarding air quality improvement and management. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

<sup>26</sup> These assessments should be submitted with the Planning Application.



Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<ol style="list-style-type: none"> <li>2) Will require an air quality assessment for development proposals that have the potential for significant air quality impacts, including those which:                             <ol style="list-style-type: none"> <li>a) are classed as major development and have the potential, either individually or cumulatively, for significant emissions; or</li> <li>b) are likely to result in an increase in pollution levels in an Air Quality Management Area (AQMA); or</li> <li>c) introduce biomass technology (i.e. applications for biomass burners that require planning permission and are not 'permitted development'); or</li> <li>d) introduce new sensitive receptors into AQMAs and are likely to expose people to existing sources of air pollutants.</li> </ol> </li> <li>3) Requires that, where an air quality assessment identifies an unacceptable impact on or from air quality, an emissions mitigation assessment and cost calculation will be required.</li> <li>4) Requires applicants to demonstrate that appropriate mitigation will be provided to ensure that the new development is appropriate for its location and unacceptable risks are avoided.</li> <li>5) Will support the deployment of biomass technology (high quality and low emission plant) in locations off the gas grid where coal and oil-fired plant are currently used and where no cleaner or greener feasible alternative is available.</li> <li>6) Will not support the deployment of biomass technology in new development in the AQMAs.</li> <li>7) Will require development to demonstrate conformity with the Institute of Air Quality's guidance 'Land-Use Planning and Development Control: Planning for Air Quality' (2017)<sup>27</sup>.</li> </ol>	
<p>Policy P12: Water resources and water quality</p>	<p>The aim of this policy is to ensure that new development does not cause an unacceptable risk to surface or groundwater resources by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Opportunities to improve water quality are used wherever possible. Proposals that are likely to have an impact on water resources will be required to demonstrate that the proposal will not cause unacceptable deterioration to water quality or have an unacceptable impact on:                             <ol style="list-style-type: none"> <li>a) the flow or quantity of groundwater; and</li> <li>b) the quality of surface or groundwater resources.</li> </ol> </li> <li>2) Supports the development or expansion of infrastructure associated with water supply, surface water drainage and wastewater treatment facilities where proposals are consistent with other relevant development plan policies such as flood risk, contamination and protection of the natural and built environment.</li> <li>3) Requires new development that is likely to have an impact on underground or surface water bodies covered by the Water Framework Directive and the South East River Basin Management Plan to contribute towards those water bodies maintaining or achieving 'Good Ecological Status'. This may take the form of on-site measures wherever possible, or a financial contribution to off-site measures.</li> </ol>	<p>No Likely Significant Effect</p> <p>This is a design/development management policy to protect surface and groundwater resources. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways</p>

<sup>27</sup> Available online at: <http://www.iagm.co.uk/text/guidance/air-quality-planning-guidance.pdf>.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy P13: Sustainable drainage systems	<p>The aims of this policy could be secured by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Requires that proposals for major development<sup>28</sup>, incorporate Sustainable Drainage Systems (SuDS) where required by the lead local flood authority.</li> <li>2) Requires development proposals to demonstrate that SuDS have been included from the early stages of site design in order to incorporate appropriate SuDS within the development. SuDs schemes will be required to satisfy technical standards and design requirements in accordance with Defra’s technical standards for sustainable drainage systems<sup>29</sup>.</li> </ol>	<p>No Likely Significant Effect</p> <p>This is a design/development management policy to ensure sustainable drainage. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy P14: Regionally important geological/geomorphological sites	<p>The aims of this policy could be secured by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Requires that development proposals that are likely to materially harm the conservation interests of Regionally Important Geological/Geomorphological Sites must demonstrate that the need for the development clearly outweighs the impact on biodiversity.</li> <li>2) Ensures that where this test is met, 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. The applicant must demonstrate that any necessary avoidance and mitigation measures will be implemented and maintained effectively.</li> </ol>	<p>No Likely Significant Effect</p> <p>This is design/development management policy which protects regionally important geological sites. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy D4: Achieving high quality design and local distinctiveness	<p>The aim of this policy is to enable the following:</p> <ul style="list-style-type: none"> <li>• Delivering high quality design across the Borough</li> <li>• Protecting the character and local distinctiveness of the Borough</li> <li>• Achieving new developments that contribute to and enhance existing character and create distinctive new environments</li> </ul> <p>By having a policy as follows:</p> <p><b>Design Standards</b></p> <p>General Principles:</p> <ol style="list-style-type: none"> <li>1) All development must have regard to the National Design Guide 2019 and all future updates, SPD's and other related guidance.</li> <li>2) All new development must demonstrate high quality of design which demonstrates a clear understanding of the local area, its character, landscape and views, significance and features of interest.</li> <li>3) Sites should consider the opportunity to create site specific identities.</li> </ol>	<p>No Likely Significant Effect</p> <p>This is a design/development management policy for achieving high quality design and ensuring local distinctiveness is maintained. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Agenda item number: 9  
Appendix 5

Page 370

<sup>28</sup> The definition of major development includes residential development of 10 dwellings or more (gross) and non-residential development of 1,000 sqm gross new floorspace or more.

<sup>29</sup> Defra (2015) Sustainable Drainage Systems: technical standards for sustainable drainage systems. Available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/415773/sustainable-drainage-technical-standards.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf).

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
---------------	---------------------------------------	---

- |  |   |  |
|--|---|--|
|  | <p>4) To avoid piecemeal development, where allocated sites are in separate ownerships, the Council seeks comprehensive and integrated design to ensure the best use of land and well connected development.</p> <p>5) Development designs should show how they respect and respond to the history of a place, its surrounding context, and how they will make a positive contribution to prevailing character, and create design led new identities with regard to:</p> <ul style="list-style-type: none"> <li>a) layout, plot sizes, building patterns and rhythms, lines and proportions,</li> <li>b) form, scale and massing,</li> <li>c) building heights,</li> <li>d) urban grain and the pattern of routes, connections and spaces locally and more widely,</li> <li>e) materials,</li> <li>f) landscape – need to provide a high standard of design and materials throughout and includes means of enclosure, paving and planting, and</li> <li>g) topography and views.</li> </ul> <p>6) New development will also be expected to:</p> <ul style="list-style-type: none"> <li>a) be inclusive, integrated and accessible for all occupants now and in the future,</li> <li>b) promote health with opportunities for recreation, leisure and social interaction, and</li> <li>c) promote safer streets and public areas and pedestrian friendly spaces.</li> </ul> <p><b>Character of development</b></p> <p>7) The Council’s objective is to ensure that all new development secures high quality design through a policy that will require that:</p> <ul style="list-style-type: none"> <li>a) new development respects local character and context including established street patterns, urban grain, building lines and topography.</li> <li>b) development proposals should respect, preserve and enhance local character and the surrounding environment through appropriate scale, height, massing, form, proportions and roof forms.</li> <li>c) layouts create an identifiable character that is connected to surrounding area and easily understood by users.</li> <li>d) high quality materials and detailing will be required in new built forms that reflect and reinforce local identity and sustain distinctive character; including architectural styles and detailing. Traditional natural materials will be supported to provide regional identity and character. High quality modern materials will be supported where they are sustainable, durable and long lasting, and they provide new or complementary identities and distinctiveness that contribute to and enhance local character.</li> <li>e) new development will be required to respond to the Guildford Town Centre Views SPD.</li> <li>f) new development creates lively, active frontages, visual interest and a sense of identity to the public realm and at pedestrian level.</li> </ul> |  |
|--|---|--|



Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy D5: Privacy and Amenity	<p>The aim of this policy is to seek to protect the quality of life of all occupiers and neighbours. This will be achieved by supporting proposals that:</p> <ol style="list-style-type: none"> <li>1) protect privacy and amenity of communities, all occupiers and neighbours,</li> <li>2) ensure developments maximise opportunities for provision of private outdoor amenity space, and</li> <li>3) provide lighting schemes that achieve their purpose without adverse glare, light spillage on close and longer views, or adversely effecting amenity of occupiers.</li> </ol> <p>The factors that will be considered to ensure that privacy and amenity are addressed include:</p> <ol style="list-style-type: none"> <li>1) visual privacy, outlook, sun light, daylight and overshadowing, artificial lighting levels,</li> <li>2) noise and vibration,</li> <li>3) odour, fumes and dust,</li> <li>4) bin and bike storage, and</li> <li>5) provision and access to electric vehicle charging points.</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy to ensure existing and new residents retain privacy and amenity. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy D6: Shopfront design	<p>The design of new or altered shopfronts can have a significant impact on the appearance, character and vitality of an area. Where new shopfronts are proposed or existing are to be altered the Council will seek to ensure that:</p> <ol style="list-style-type: none"> <li>1) shopfronts are well designed and should have proportioned, and interesting facades, with displays and interiors open to view to provide visual interest,</li> <li>2) security measures are permeable to allow views through. Blank facades, solid grilles and roller shutters creating dead frontages will not be supported, and</li> <li>3) shopfronts allow for easy access for all.</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy regarding appropriate shop front design. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy D7: Advertisements, hanging signs, and illumination	<p>Proposals for advertisements will need to comply with the following:</p> <ol style="list-style-type: none"> <li>1) new advertisement and signage on or within the curtilage of a listed building must demonstrate that it would not result in adverse harm to the integrity of the building's design, historical character, structure or setting.</li> <li>2) The scale, colour, materials and detailing must be sympathetic to the character of the listed building, and must not detract from or conceal any features of significance. Projecting hanging signs will be resisted in the historic cobbled section of the High Street where it would adversely impact on heritage assets and their setting;</li> <li>3) within a Conservation Area new advertisement and signage will be permitted where it can be demonstrated that it would not result in adverse harm to the integrity of the building's structure and design, historical character and setting. Signage should be sensitive to the character of the area, visually unobtrusive, well designed, well located and should not create access issues. The quantity of advertisement is to be kept to the minimum necessary to identify the building and its function;</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy with regards to signage and ensuring building design and character are retained. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways</p>

Agenda item number: 9  
Appendix 5

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>4) there will be a presumption against proposals for internally and/or externally illuminated fascia and hanging signs unless it can be demonstrated that the premises rely principally on trading after dark. Illumination of shop front fascia's and signs will be resisted in the historic setted section of Guildford High Street;</li> <li>5) be of high-quality design, sensitive to the visual appearance of the building, the surrounding street scene, and views, and having regard to the significance of designated heritage assets and their setting,</li> <li>6) be appropriate to and relevant to the business or premises on which it relates,</li> <li>7) it does not contribute to unsightly proliferation or clutter of signage in the vicinity,</li> <li>8) it does not create a hazard to pedestrians or road users, and</li> <li>9) it does not cause visual intrusion through light pollution.</li> </ul>	
<p>Policy D8: Public realm</p>	<p><b>General principles</b> The Council's objectives will require new public realm projects to:</p> <ul style="list-style-type: none"> <li>1) be informed by their context including the area's distinctive qualities, identity, topography and opportunities of the relevant places within the Borough;</li> <li>2) be of high quality in terms of design and materials used, sustainable, robust and user friendly for all, and create varied and attractive environments and spaces where people want to be, and to contribute to;</li> <li>3) enhance connectivity for pedestrians and cycle movement;</li> <li>4) provide views and focal points to enable ease of access and legibility to places people wish to visit;</li> <li>5) provide opportunity for flexible multi-use community spaces;</li> <li>6) provide opportunity for charging points;</li> <li>7) be appropriately maintained for the long term, and;</li> <li>8) provide opportunity for on street dining where it relates to the business use, comprises of moveable furniture, and does not obstruct pedestrian routes.</li> </ul> <p><b>Public Art</b> Public art can contribute considerably to the quality of the environment when it is well considered, designed and appropriate. The Council will only permit development for an artwork, statue or memorial where a proposal has been:</p> <ul style="list-style-type: none"> <li>1) considered and assessed against the Council's Art Strategy;</li> <li>2) 10) responds appropriately to its context, contributes to community engagement and ownership and where the future care and maintenance are secured.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy regarding the design of the public realm. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
<p>Policy D9: Residential intensification</p>	<p>The aim of this policy is to identify design principles that will apply to residential intensification schemes, with further specific points for villages inset from the Green Belt:</p>	<p>No Likely Significant Effects</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>1) Residential intensification within the borough should follow good design principles set out in the National Design Guide, elsewhere in this Plan and as appropriate within Neighbourhood Plans. Additionally, the policy will require that schemes:</p> <ul style="list-style-type: none"> <li>a) Make the best use of land,</li> <li>b) Establish or enhance a sense of place, avoiding isolated and piecemeal development and using innovative design approach where appropriate,</li> <li>c) Proposals involving 'back-land' development must avoid long, narrow and isolated access points, such developments should create a positive 'street' entrance establishing a sense of identity and encouraging pedestrian and cycle traffic into and out of the site,</li> <li>d) Schemes should demonstrate that relationships with both existing neighbouring development and buildings/gardens within the site are acceptable taking into account back to back or back to front distances are appropriate. The privacy of existing and proposed residential areas should also be respected by any new layout,</li> <li>e) To ensure proposals come forward in an integrated manner designs should ensure landscaping measures, parking, refuse storage and collection facilities are all planned at the outset and relate well to the buildings within the site,</li> <li>f) Where the Council considers that land has come forward which could be incorporated into a more comprehensive scheme it will require appropriate infrastructure contributions from individual proposals which may be lower than the normal thresholds. Contributions will be based on a level of development across the comprehensive area which the Council considers appropriate,</li> </ul> <p>1) Additionally, within villages areas now inset from the Green Belt, proposals should:</p> <ul style="list-style-type: none"> <li>a) Respect the surrounding grain of development</li> <li>b) Introduce development forms which reflect the character and context of the village</li> <li>c) Avoid layouts that are overly formalised where surrounding village patterns are organically driven</li> <li>d) Ensure that the transitional character of edge of village/settlement areas is not lost and that hard urban forms are not introduced in semi-rural environments</li> <li>e) Encourage pedestrian/cycle links to key village facilities</li> </ul>	<p>This is a design/development management policy with regards to ensuring intensification of residential development follows good design principles. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
<p>Policy D10: 'Agent of Change' and noise impacts</p>	<p>The aims of this policy could be secured by having a policy that:</p> <p>Supports the development of 'noise-sensitive' and 'noise-generating' uses where proposals accord with the NPPF, but requires that:</p> <ul style="list-style-type: none"> <li>1) planning applications for the development of noise-sensitive uses should consider their proximity to noise-generating uses. Applications for noise-generating uses should also consider their proximity to noise-sensitive</li> <li>2) uses. Where appropriate, applications should include a Noise Impact Assessment, which considers this relationship and the impact of any potential noise impacts either on or from</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy ensuring development considers noise sensitive areas etc. It does not provide for a quantum of development or identify any locations for development</p>

Agenda item number: 9  
Appendix 5

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>the proposed development<sup>30</sup>. Applicants must clearly identify the likely effect levels from, or on, existing uses nearby to the proposed development as a result of the proposal, including the potential adverse effect that they may have on the new and existing residents or users.</p> <p>3) where evidence of potential Adverse Noise Effect Level impact exists<sup>31</sup>, the applicant must demonstrate how the proposed development will be designed and implemented in order to;</p> <p>f) Prevent any present and very disruptive Significant Observed Adverse Effect levels,</p> <p>g) Avoid any present and disruptive Significant Observed Adverse Effects, and mitigate effectively any present and intrusive Lowest Observed Adverse Effect levels. if the application site cannot be designed and implemented to fully prevent, avoid and mitigate potential Adverse Noise Effect impacts</p> <p>h) as appropriate, the applicant should explore whether the existing development has potential to be adapted without adversely affecting the existing operation.</p> <p>4) applicants must demonstrate how the proposal has been designed and will be implemented in accordance with good acoustic design principles both externally and internally<sup>32</sup>, demonstrating that they have avoided creating or maintaining pathways of impact between sources of sound nuisance and sensitive receptors.</p> <p>5) as the 'agent of change', the applicant is responsible for ensuring the likely adverse noise effects are identified and all relevant appropriate measures to manage the effects are implemented. This includes any measures required to be undertaken to the noise-generating use as a result of proposals for noise-sensitive uses, where necessary.</p> <p>6) where there is likely to be an unacceptable impact on either proposed or existing noise-sensitive uses, which cannot be prevented or adequately mitigated, planning permission is likely to be refused.</p> <p><b>Noise-sensitive uses</b></p> <p>7) noise-sensitive development should be designed to ensure that noise-generating venues and uses remain viable without unreasonable restrictions being placed on them. proposals should be designed to reduce the impact of noise from adjoining activities or the local environment; incorporating appropriate noise barriers and optimising the sound insulation provided by the building envelope.</p> <p>8) proposals should ensure that any potential noise impacts are mitigated wherever possible, using measures such as those provided in Planning Practice Guidance<sup>33</sup>, including by</p>	<p>No linking impact pathways</p>

<sup>30</sup> Noise Impact Assessments should be produced by an independent, suitably qualified individual, tailored for local circumstances, and carried out to industry best practice guidelines at the time of the application.

<sup>31</sup> As defined within the Noise exposure hierarchy table, available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/820957/noise\\_exposure\\_hierarchy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/820957/noise_exposure_hierarchy.pdf)

<sup>32</sup> Section 5 of BS 8223:2014 provides guidance on how best to achieve this.

<sup>33</sup> See PPG Paragraph 011 Reference ID: 30-011-20190722.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>providing relatively quiet amenity areas or facades (containing windows to habitable rooms) as part of each dwelling.</p> <p><b>Noise-generating uses</b></p> <p>9) new noise-generating development (such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues) proposed close to residential and other noise-sensitive development should put in place measures such as soundproofing to mitigate and manage any noise impacts for neighbouring residents and businesses.</p> <p>10) 10) particular consideration should be given to the potential effects of noisy development on international, national and locally designated sites of importance for biodiversity.</p>	
<p>Policy D11: Corridor of the River Wey and Guildford and Godalming navigation</p>	<p>The Council's objective is to protect or enhance the special character of the River Wey and the Guildford and Godalming Navigations, especially their visual quality, setting, amenity, ecological value, architectural and historic interest, views within from the corridor, and the Nature Conservation value of the site. It will undertake this by having a policy that;</p> <ol style="list-style-type: none"> <li>1) seeks a high quality of design, both sensitive to and appropriate to, the context and function, and the special historic interest, of the river, its navigation and landscape. High quality design will be expected on all sides fronting, or in the vicinity of the river Wey, or affecting its setting,</li> <li>2) requires developments to seek to provide publicly accessible riverside walkways and/or cycle routes to enhance the vitality of the riverside,</li> <li>3) requires improvement of access to and from the river itself by foot, bicycle and/or boats,</li> <li>4) requires riverside developments to secure improvements to existing landscaping and provide new native planting schemes and that contribute to the biodiversity of the riparian environment, and</li> <li>5) ensures that sensitive levels of lighting are used to retain existing character and to protect amenity, natural habitats and night sky.</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy to protect the special character of the River Wey and Guildford and Godalming Navigations. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
<p>Policy D12: Sustainable and low impact development</p>	<p>The aim of this policy is to provide greater detail to supplement policy D2 where it supports sustainable and low impact development by having a policy that:</p> <p><b>Energy efficient development</b></p> <ol style="list-style-type: none"> <li>1) Introduces an explicit requirement for schemes to follow a low energy design and energy efficient fabric approach<sup>34</sup> to ensure that schemes maximise energy reductions before low carbon and renewable energy technology is considered, in line with the energy hierarchy.</li> </ol> <p><b>Embodied carbon</b></p>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy with regards to energy efficient development reducing impacts on the environment. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Agenda item number: 9  
Appendix 5

Page 376

<sup>34</sup> The 'fabric first' approach should be based upon a consideration of U-values, thermal bridging, air permeability, and thermal mass, and also features that affect lighting and solar gains, such as building orientation and layout.



Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>2) Requires schemes to demonstrate that choice of materials has taken account of the need to reduce embodied carbon emissions including by:</p> <ul style="list-style-type: none"> <li>a) sourcing materials locally where possible to reduce embodied emissions from transport, and</li> <li>b) taking into account the embodied carbon that results from the process of producing materials when choosing them, based on information provided in a respected material's rating database. This requirement does not apply where specific materials are needed for conservation or heritage reasons.</li> </ul> <p>3) Expects developments to consider the lifecycle of buildings and public spaces, including how they can be adapted and modified to meet changing social and economic needs and how materials can be reused or recycled at the end of their lifetime.</p> <p><b>Waste</b></p> <p>4) Requires development proposals with an estimated cost of £400,000 or above to be accompanied by a simple Site Waste Management Plan (SWMP) and £670,000 or above to be accompanied by a more detailed SWMP. The SWMP should follow established methodology; setting out how site waste will be managed during construction and that material reclamation, reuse and recycling has been prioritised. This provides additional detail for policy D2(1a &amp; 1b) which requires the efficient use and reuse of mineral resources and waste minimisation. The SWMP should be submitted within or alongside the sustainability statement/sustainability information that is required to be submitted under Policy D2.</p> <p><b>Water efficiency</b></p> <p>5) Expects all development proposals to incorporate measures to harvest and conserve water resources and, where possible, incorporate water recycling/reuse, building on policy D2 (d) which requires new dwellings to meet the highest national standard, currently the "optional requirement" described in Building Regulation 36 2(b)95.</p>	
<p>Policy D13: Climate change adaptation</p>	<p>The aim of this policy is to deliver climate change resilient development by providing further detail to support strategic Policy D2 (4) by having a policy that supports climate change adaptation and identifies the keys issues to be addressed. The policy would include the following measures:</p> <ul style="list-style-type: none"> <li>1) Buildings are required to be designed and constructed to provide for the comfort, health, and wellbeing of current and future occupiers over the lifetime of the development, covering the full range of expected climate impacts and with particular regard to overheating. Developments likely to accommodate vulnerable people, such as schools and care homes, should demonstrate that their specific vulnerabilities have been taken into account with a focus on overheating.</li> <li>2) Buildings are required to incorporate passive cooling measures and the exclusion of conventional air conditioning wherever possible in line with the cooling hierarchy.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy with regards to ensuring development can adapt to climate change. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>3) Schemes are required to minimise the urban heat island effect as far as possible including through:</p> <ul style="list-style-type: none"> <li>a) choice of materials,</li> <li>b) layout, landform, massing, orientation and landscaping,</li> <li>c) retention and incorporation of green and blue infrastructure</li> </ul> <p>4) Schemes are required to demonstrate adaptation for more frequent and severe rainfall events through measures including:</p> <ul style="list-style-type: none"> <li>d) retaining existing water bodies,</li> <li>e) incorporating new water features (including SuDS),</li> <li>f) designing planting and landscaping schemes to absorb and slow down surface water,</li> <li>g) ensuring SuDS comply with national and county guidance and advice<sup>35</sup>, and</li> <li>h) the use of permeable ground surfaces wherever possible.</li> </ul> <p>5) Schemes in areas of high risk of wildfire are designed to prevent the spread of fire, taking into account the risk to health and potential damage to significant habitats.</p>	
Policy D14: Climate change mitigation	To not propose a policy at this stage but to consider policy options once the outcome of the Future Homes consultation is known.	No policy to assess.
Policy D15: Large scale renewable and low carbon energy	<p>To allocate one or more sites for renewable and low carbon energy development in appropriate locations where visual and other impacts will be minimised and where energy potential is good.</p> <p>New large scale renewable and low carbon energy developments are required to set out in a management plan how biodiversity will be supported, maximising opportunities for biodiversity gain in line with good practice guidance.</p>	<p>No Likely Significant Effects</p> <p>At the moment this policy does not allocate any sites. In any event, any large scale renewable and low carbon energy proposal would be subject to the provisions of Policy P5 in adopted LPP1 which states that '<i>Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development</i>'.</p>
Policy D16: Designated heritage assets	<p>The Council's objective is to set out a positive strategy for the conservation and enhancement of all designated heritage assets by having a policy that addresses the following issues:</p> <p><b>Supporting Information</b></p> <p>1) Expects all proposals affecting designated heritage assets, including curtilage buildings and structures and their setting, to be supported by a Statement of Significance and Impact. The level of detail provided within the statement should be proportionate to the assets'</p>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to protect designated heritage assets. It does not provide for a quantum of development or identify any locations for development</p>

Agenda item number: 9  
Appendix 5

Page 378

<sup>35</sup> Surrey County Council and national guidance can be found on the Surrey County Council website here: <https://www.surreycc.gov.uk/people-and-community/emergency-planning-and-communitysafety/flooding-advice/more-about-flooding/suds-planning-advice>.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>importance and no more than is sufficient to facilitate an understanding of the potential impact. To accord with the requisite of validation it must:</p> <ul style="list-style-type: none"> <li>a) have consulted the relevant historic environment record;</li> <li>b) demonstrate a clear understanding of the asset's significance including all those parts affected by the proposals, and where applicable the contribution made by its setting;</li> <li>c) explain how the asset and its setting will be affected by the proposal, including how the proposal preserves or enhances the heritage asset or better reveals its significance;</li> <li>d) demonstrate what steps have been taken to mitigate any resultant harm;</li> <li>e) present a justification for the proposals that explains why any resultant harm is considered to be necessary or desirable; and</li> <li>f) identify what public benefits might arise from the proposals in cases where harm has been identified.</li> </ul> <p><b>Loss of Significance</b></p> <ul style="list-style-type: none"> <li>2) Proposals which result in harm to, or loss of, the significance of a designated heritage asset will be considered in line with the policies in the NPPF (specifically paragraphs 194 – 196). The level of public benefit associated with the preservation of heritage assets on the 'Heritage at Risk' register managed by Historic England may require special consideration in terms of the impact on the significance of the asset.</li> </ul> <p><b>Enabling Development</b></p> <ul style="list-style-type: none"> <li>1) Development proposals for enabling development that would otherwise conflict with other planning policies, but which would secure the future conservation of a heritage asset will be supported provided: <ul style="list-style-type: none"> <li>a) They meet all the tests set out in Historic England's Enabling Development Policy cited within the guidance document Enabling Development and the Conservation of Significant Places (or guidance superseding it), and</li> <li>b) It can be demonstrated that alternative solutions are inappropriate, and</li> <li>c) They are subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development.</li> </ul> </li> </ul>	<p>No linking impact pathways</p>
<p>Policy D17: Listed Buildings</p>	<p>The aim of this policy is to add more operational detail to the LPSS Policy D3 for development proposals affecting listed buildings, to ensure their continued protection, by having a policy that:</p> <ul style="list-style-type: none"> <li>1) Requires that alterations, additions or other works, directly, indirectly or cumulatively affecting the special interest of a statutory listed or curtilage listed building and their settings to: <ul style="list-style-type: none"> <li>a) Sustain and enhance the architectural and historical significance and integrity;</li> <li>b) Be of an appropriate scale, form, height, massing and design which respects the host building and its setting;</li> <li>c) Retain the historic plan form and structural integrity of the building;</li> </ul> </li> </ul>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to protect listed buildings. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>d) Have regard to the architectural and historic features forming part of the special interest of the building;</li> <li>e) Reinforce the intrinsic character of the building through the use of appropriate materials, details and building techniques;</li> <li>f) Not harm the special interest and significance of buildings or structures forming part of the curtilage of the heritage asset; and</li> <li>g) Respect the character and appearance of a park, garden or yard of historic or designated interest.</li> </ul> <p>2) Supports proposals involving a change of use of part or the whole of a listed building where details of all intended alterations to the building and its curtilage have been shown, and where:</p> <ul style="list-style-type: none"> <li>a) the proposed use would not be harmful to the special interest of the building;</li> <li>b) the building is capable of accommodating the proposed change of use without considerable alteration and consequent loss of special interest.</li> </ul> <p>3) Supports proposals that seek to adapt to, or mitigate the effects of, climate change that are sympathetic and conserve the special interest and significance of the heritage asset or its setting. Where conflict between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change should be weighed against any harm to the significance of heritage assets.</p>	
<p>Policy D18: Conservation areas</p>	<p>The Council’s objective is to add more operational detail to the LPSS Policy D3 for development proposals affecting development with conservation Areas, to ensure their continued protection, by having a policy that:</p> <ul style="list-style-type: none"> <li>1) Requires that any development within or which would affect the setting of a Conservation Area to preserve and enhance the character and local distinctiveness of the area. It must pay due regard to the Council’s Conservation Area Appraisal for the relevant area.</li> <li>2) Requires development within, affecting the setting of, or views into or out of a Conservation Area to preserve and enhance features that contribute positively towards the area’s character and appearance. Particular consideration will be given to the following: <ul style="list-style-type: none"> <li>a) The retention of buildings, groups of buildings, historic settlement patterns, plot widths, open spaces, historic building lines and ground surface;</li> <li>b) Retention of architectural details that contribute positively to the character or appearance of the area;</li> <li>c) The impact of the proposal on the skyline and landscape;</li> <li>d) The protection of trees that contribute positively towards the character and appearance of the area.</li> </ul> </li> <li>3) Requires proposals for all new development, and extensions and alterations to existing buildings to be of a high quality of design, which reinforces or compliments the character and local distinctiveness of the Conservation Area by having regard to:</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to protect conservation areas. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Agenda item number: 9  
Appendix 5

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>a) the height, massing, scale, form, roofscape, plot width and spaces between buildings;</li> <li>b) the use of good quality sustainable building materials and detailing appropriate to the locality and sympathetic in colour, profile and texture.</li> </ul> <p>4) Seeks to retain attractive traditional materials, features and detailing such as original doors, windows, chimneys and boundary walls</p>	
<p>Policy D19: Scheduled monuments &amp; registered parks and gardens</p>	<p>The Council’s objective is to add more operational detail to the LPSS Policy D3 for development proposals affecting Scheduled Monuments &amp; Registered Parks and Gardens, to ensure their continued protection by having a policy that includes the following measures:</p> <p><b>Scheduled Ancient Monuments</b></p> <ul style="list-style-type: none"> <li>1) Proposals affecting scheduled ancient monument will be expected to pay consideration to: <ul style="list-style-type: none"> <li>a) The presumption against substantial harm to or loss of scheduled ancient monuments;</li> <li>b) The relationship of the monument with other archaeology and the wider landscape in which it should be interpreted;</li> <li>c) The condition and management of the monument;</li> <li>d) The existing and future security of the monument; and</li> <li>e) The desirability of increasing understanding, interpretation and public access In such cases, an appropriate archaeological evaluation/assessment of significance by a suitably qualified person will be required.</li> </ul> </li> <li>2) Development that would prejudice the fabric or setting of a scheduled ancient monument or planning applications which do not provide satisfactory information about the implications of the proposal upon a scheduled ancient monument, will be resisted.</li> </ul> <p><b>Registered Parks and Gardens</b></p> <ul style="list-style-type: none"> <li>3) Proposals affecting a registered historic park and garden will be expected to pay consideration to: <ul style="list-style-type: none"> <li>a) The presumption against substantial harm to or loss of a nationally registered historic park and garden;</li> <li>b) The desirability of preserving or enhancing the special historic interest;</li> <li>c) Safeguarding those features which form an integral part of its special character and appearance;</li> <li>d) Ensure that development does not detract from the enjoyment, layout, design, character, appearance or setting of the Park or Garden, key views out from the Park, or prejudice its future restoration.</li> </ul> </li> <li>4) Development that would prejudice the fabric or setting of a registered park and garden or planning applications which do not provide satisfactory information about the implications of the proposal upon a registered park and garden, will be resisted.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to protect scheduled monuments and registered parks and gardens. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy D20: Non-designated heritage assets	<p>The Council’s objective is to ensure that the value and significance of the borough’s non-designated heritage assets are protected so that they continue to contribute to the richness of the historic environment and inform future development and regeneration of the borough by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Places a requirement for all proposals affecting non-designated heritage assets, and/or their setting, to be supported by a Statement of Significance and Impact that is proportionate to the significance of the asset and which justifies the changes to the asset.</li> <li>2) Supports the safeguarding of non-designated heritage assets of local significance that have been identified as one of the following;               <ol style="list-style-type: none"> <li>a) Locally Listed Building or Buildings of Merit identified in neighbourhood plans</li> <li>b) Locally Listed Historic Park or Garden</li> <li>c) County Site of Archaeological Importance</li> <li>d) Area of High Archaeological Potential</li> </ol> <p>Or which are identified during the pre-application or application processes</p> </li> <li>3) Stipulates that when determining applications, a balanced judgement is to be given to the scale of any harm against the degree and extent of any significance that the heritage asset possesses; any contribution it makes to the area, and the public benefits of the proposal.</li> <li>4) Requires that County Sites of Archaeological Importance or Areas of High Archaeological Potential which are demonstrably of equivalent significance to Scheduled Monuments be considered against Policy D19 if effected by a development proposal.</li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to protect non-designated heritage assets. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy ID5: Protecting open spaces	<p>The aim of this policy is to provide detail and clarity for policy ID4 in order to enhance protection of open space by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Clarifies that where provision of open space exceeds OSSRA minimum standards, it does not mean that an open space site will be considered surplus to requirements. An open space will not be considered surplus to requirements unless:               <ol style="list-style-type: none"> <li>a) an analysis has shown that the land is no longer needed as open space, including consideration as to whether the site can be repurposed in order to correct deficits in other open space typologies, or the site is not of sufficient quality to be considered open space and cannot be improved, and</li> <li>b) The loss of the space would not result in a deficit in open space in terms of accessibility, quality or quantity.</li> </ol> </li> <li>2) Requires any development on open space to achieve biodiversity net gains in line with Policy P7.</li> <li>3) Does not permit the loss of any open space that has a specific nature conservation, historic, cultural or recreational value.</li> <li>4) Clarifies that development will be acceptable on open spaces where the development is beneficial to the role and function of the site and its ancillary uses.</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to protect open spaces. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Agenda item number: 9  
Appendix 5

Page 382

**Policy Number**      **Policy Description (Preferred Option)**

**Likely Significant Effects Screening Decision**

Policy ID6: Open space in new developments

The aim of this policy is to ensure that new developments provide new open spaces that provide best value in terms of multi-functional benefits by having a policy that includes the following provisions:

**Residential developments**

- 1) Supports provision of new open space that meets the need for open space as set out in this policy.
- 2) Developments that reach the thresholds in the table below will generally be expected to provide new open space of the following typologies on-site. Where no on-site provision for a particular type of open space can be provided, a financial contribution will be sought for provision of new and/or improvement to existing open spaces off-site.

Open space typology	11-49 dwellings	50-249 dwellings	250+ dwellings	Strategic sites (In LPSS) <sup>36</sup>
Amenity/Nat. Green Space	✓	✓	✓	✓
Parks & Rec. Grounds	X	X	✓	✓
Play Space (children)	X	✓	✓	✓
Play Space (Youth)	X	X	✓	✓
Allotments	X	X	X	✓

- 3) Where new open space is provided, it should meet the following quantity and access standards:

Typology	Quantity standards (ha/1000 people)	Access standard (maximum distance from the new homes)
----------	-------------------------------------	---

No Likely Significant Effects

This policy is a design/development management policy which aims to provide open spaces in new developments. It does not provide for a quantum of development or identify any locations for development

No linking impact pathways.

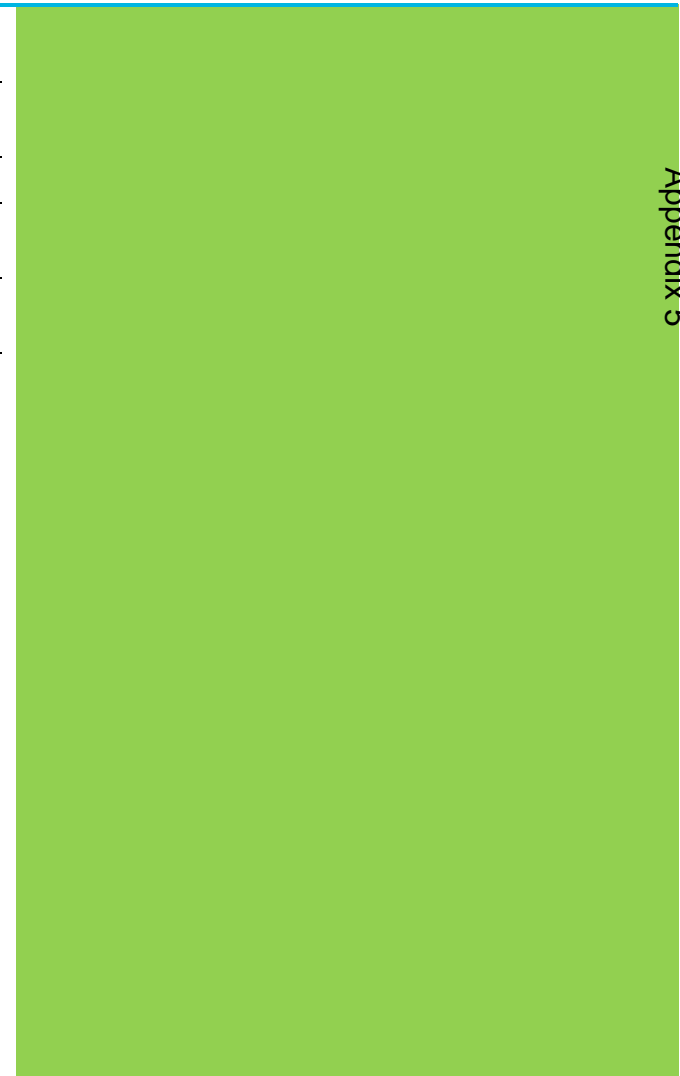
<sup>36</sup> Site Allocations: A24 – Slyfield Area Regeneration Project; A25 – Gosden Hill; A26 – Blackwell Farm; A31 – Land to the South and East of Ash and Tongham; and A35 – Former Wisley Airfield.

**Policy Number**      **Policy Description (Preferred Option)**      **Likely Significant Effects Screening Decision**

Allotments	0.25	480 metres or 10 minutes' walk time
Amenity Green Space	1 (total)	270 metres or 15 minutes' walk time
Natural Green Space		ANGSt standard
Parks & Recreation Grounds	1.35 public & private of which a minimum of 0.8 is public	720 metres or 15 minutes' walk time
Play Space (Children)	0.05	480 metres or 10 minutes' walk time
Play Space (Youth)	0.03	720 metres or 15 minutes' walk time

- 4) The parks and recreation grounds standard includes an allowance for playing pitches. Further detail regarding the need for playing pitches of different types will be set out in the Council's Playing Pitch Strategy. A minimum of 0.8ha/1000 of the total 1.35ha/1000 must be for public space. Contributions towards private sport provision will be acceptable where there is clear public benefit, for example through inclusion of a community access agreement that enables participation by all members of the community.
- 5) New developments are expected to provide an element of community growing space where appropriate. This may be particularly appropriate for denser developments where residents may have limited access to private gardens of their own, where smaller plots and shared growing spaces would be attractive and where maintenance arrangements are put in place to prevent the spaces falling into neglect.
- 6) The occupancy rates of new homes (used to calculate the total number of residents) are required to be based on the most recent census information or other robust data, taking into account the likely child yield as a result of the housing mix when considering child and youth play space.
- 7) Proposals for new open space are expected to aim to correct any existing deficiencies in specific types of open space in the locality of the development. The Council will work with applicants to identify open space needs and will support proposals that deviate from the mix of typologies set out in this policy where deficiencies are corrected, and the full provision of open space is made.

**Commercial developments**



Agenda item number: 9  
Appendix 5



Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>8) Commercial sites will be encouraged to provide areas of amenity open space of an appropriate size, scale and character within or adjacent to the development. The level of provision will be decided on a case-by-case basis.</p> <p><b>Quality and design of new open space</b></p> <p>9) New open spaces are required to be multi-functional spaces that deliver a range of benefits including biodiversity gains, flood risk improvements, climate change measures and social inclusivity.</p> <p>10) New open spaces are required to meet minimum size, design and quality standards as set out in the Open Space, Sports and Recreation Assessment. In particular, areas of land proposed for Amenity Green Space must be greater than 0.15ha in size. New open spaces should be safe and secure for all members of the community.</p> <p>11) Open spaces are expected to support and enhance the existing rights of way network, providing new footpaths and cycle links where possible, with regard to the Council's identified opportunities for high quality walking and cycling networks (see Policy ID10) and where compatible with the specific purpose of the open space. Sites are expected to be designed to link up open spaces as much as possible.</p>	
<p>Policy ID7: Sport, recreation and leisure facilities</p>	<p>To have a policy that supports development that provides, increases or improves opportunities for public sport, recreation and leisure, including schemes for new, replacement and extensions to existing facilities, and engineering works, if:</p> <ol style="list-style-type: none"> <li>1) they support and enhance the existing rights of way network, providing new footpaths and cycle links where possible with reference to Policy ID10: Cycle Networks.</li> </ol> <p>Large sport, recreation and leisure facilities are expected to:</p> <ol style="list-style-type: none"> <li>2) restrict built development to that wholly necessary to support the recreational or leisure use and ancillary activities, and</li> <li>3) for developments that will have high water usage, include water collection and storage measures in order to avoid abstraction from surface water bodies or groundwater or recourse to the public water supply.</li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development policy which aims to provide increase and improve opportunities for public sport, recreation and leisure. Any proposals would be subject to the provisions of Policy P5 in adopted LPP1 which states that <i>'Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development'</i>.</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy ID8: Community facilities	<p>The aim of this policy is to enable access to community facilities, supporting healthy and inclusive communities, by having a policy that:</p> <p><b>Proposals for new community facilities including their replacement or expansion</b></p> <ol style="list-style-type: none"> <li>1) Supports permission for community facilities within urban areas and villages provided that:               <ol style="list-style-type: none"> <li>a) they are appropriate in design terms;</li> <li>b) there are no unacceptable transport impacts; and</li> <li>c) there are no undue detrimental impacts on amenities of neighbouring properties.</li> </ol> </li> <li>2) Enables the provision of accessible and viable community facilities by:               <ol style="list-style-type: none"> <li>a) expecting that they are located and designed so that they can be conveniently accessed via public transport, walking and cycling;</li> <li>b) encouraging their co-location with compatible and mutually supportive facilities or uses;</li> <li>c) supporting complementary or ancillary uses, closely associated with or as part of the facility, provided they do not detract from the facility and its primary function.</li> </ol> </li> </ol> <p><b>Proposals for the loss of community facilities</b></p> <ol style="list-style-type: none"> <li>3) Resists the loss or change of use of community facilities, with proposals for such potential loss or change of use required to demonstrate that:               <ol style="list-style-type: none"> <li>a) the retention of the facility has been explored without success by offering it for sale or lease for its existing community use for at least 18 months;</li> <li>b) offering it for sale or lease under (a) has included consideration of alternative suitable community facility uses, before change of use to residential or other use with no ongoing community facility use is permitted; and</li> <li>c) adequate alternative provision is demonstrated to exist in the locality or is made available in an agreed suitable location.</li> </ol> </li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to enable access to community facilities. Any proposals would be subject to the provisions of Policy P5 in adopted LPP1 which states that <i>'Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development'</i>.</p> <p>No linking impact pathways.</p>
Policy ID9: Retention of public houses	<p>The preferred option is to develop a policy that resists applications for redevelopment or changes of use of public houses to alternative uses, except where their continued use as a pub is no longer economically viable.</p> <p>The policy would include the following specific requirements:</p> <ol style="list-style-type: none"> <li>1) Applications for development involving the loss or partial loss of a public house will be required to provide evidence that the building has been marketed actively and comprehensively as a public house and alternative community facility for a continuous period of at least 18 months, ending close to or immediately prior to submission of the application or preapplication enquiry. For marketing of a public house to be considered active and comprehensive, it will be required to fulfil the relevant criteria in the Council's Marketing Supplementary Planning Document.</li> <li>2) For public houses located outside the boundary of the town centre, applicants will also be required to undertake and provide details of:</li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to resist applications for redevelopment of public houses. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Agenda item number: 9  
Appendix 5

Page 386

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>d) public consultation to ascertain the value of the public house to the local community;</li> <li>e) an evaluation of the public house's continued viability, with consideration of its existing and potential trade; and</li> <li>f) an assessment of alternative licensed premises within easy walking distance of the public house which is the subject of the application; and whether such alternative premises offer similar facilities (for example restaurants, function rooms, beer gardens) and a similar community environment.</li> </ul> <p>3) The loss of part of a public house, including car parking or other facilities complementary to its operation as a public house, will be resisted where it would adversely affect such operation, unless the marketing required under this policy demonstrates the public house use to be unviable.</p>	
<p>Policy ID10: Achieving a comprehensive Guildford borough cycle network</p>	<p>The aim of this policy option is to achieve a comprehensive Guildford borough cycle network. The Policies Map will be updated using the cycle network plan outputs from the following sources:</p> <ul style="list-style-type: none"> <li>• Guildford BC's Route Assessment Feasibility Study, for the Guildford urban area. [Available as Appendix 1].</li> <li>• Surrey CC's Guildford Local Cycling Plan, particularly for the rest of the borough outside of the Guildford urban area. [Available as Appendix 2].</li> </ul> <p>The Policies Map will therefore show specific routes along which the Council, working with Surrey County Council the Local Highway Authority and other partners, will undertake or promote measures to encourage cycling, including improvements to the safety and convenience of the routes, the designation of cycle tracks, the designation of cycle lanes, and the signposting and the provision of cycle parking facilities.</p> <p>The policy will require that new developments have regard to the Guildford borough cycling plan, as represented on the updated Policies Map, in addressing the requirements of Policy ID3 Sustainable transport for new developments in the Local Plan: Strategy and Sites.</p> <p><b>Potential advantages of this policy option:</b></p> <ul style="list-style-type: none"> <li>• Combines the best of the two evidence sources.</li> <li>• Provides for a denser and safer cycle network in the Guildford urban area.</li> <li>• Provides a common, updated basis for the improvement of the Guildford borough cycle network.</li> </ul> <p><b>Potential disadvantages of this policy option:</b></p> <ul style="list-style-type: none"> <li>• The Guildford BC study identified a denser network in the Guildford urban area, which is likely to involve greater expenditure to realise.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to achieve a comprehensive cycle network. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy ID11: Parking standards	<p>The aim of this policy option is to:</p> <ol style="list-style-type: none"> <li>1) Define maximum car parking standards for new residential developments in Guildford town centre.</li> <li>2) Define one set of minimum car parking standards for new residential developments in the rest of Guildford borough (except Guildford town centre).</li> <li>3) Define expected vehicle parking standards for new non-residential developments across the whole borough.</li> <li>4) Define minimum cycle parking standards for both new residential and non-residential developments across the whole borough.</li> <li>5) Define electric vehicle charging standards consistent with Surrey CC's Vehicular and Cycle Parking Guidance (2018) plus an additional requirement with respect to non-allocated car spaces in new residential developments.</li> </ol> <p>Tables 3 - 7 below provide draft standards for items 1-5 above respectively.</p> <p><b>Potential advantages of this policy option:</b></p> <ul style="list-style-type: none"> <li>• Contribute to optimising the density of development in Guildford town centre given that it is well served by public transport.</li> <li>• Reduced car trip making for occupants of and visitors to residential developments in Guildford town centre, all other factors being equal.</li> <li>• Avoid potential problems of congested on-street parking in new development and overspill parking on adjacent local streets in the rest of the borough.</li> <li>• Consistent with Surrey CC's Vehicular and Cycle Parking Guidance (2018) with respect to standards for both the minimum provision of cycle parking and electric vehicle charging facilities.</li> </ul> <p><b>Potential disadvantages of this policy option:</b></p> <ul style="list-style-type: none"> <li>• Will not contribute to optimising the density of residential development in areas of the borough outside Guildford town centre.</li> <li>• Increased car trip making for occupants of and visitors to residential developments outside of Guildford town centre, all other factors being equal.</li> <li>• Inconsistent with Surrey CC's Vehicular and Cycle Parking Guidance (2018) with respect to vehicular parking standards for both new residential developments outside of the Guildford town centre and for all non-residential developments.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy for parking within the borough. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Agenda item number: 9  
Appendix 5

## 5. In-combination Assessment

- 5.1 The Guildford LPP2 must be looked at in-combination with other plans and projects within 5km of the SPA. The plans and projects looked at within the in-combination assessment are listed in paragraph 2.23.
- 5.2 The location of the Thames Basin Heaths SPA has resulted in the area being subject to high development pressure. Which can increase recreational pressure and urbanisation within the SPA.
- 5.3 In 2005, a visitor assessment of the Thames Basin Heaths SPA<sup>37</sup> determined that the majority of visitors travel by car and drive relatively short distances (less than 5km). This helped determine that any new residential development within 5km of the SPA could result in likely significant effects upon the SPA.
- 5.4 Therefore, although a borough's contribution may only be small alone it must be looked at as an accumulation of small effects with other boroughs within the 5km boundary in which it is thought LSE may occur. Development across all boroughs within 5km of the boundary of the SPA could therefore have a large adverse effect upon the SPA with regards to recreational pressure and urbanisation.
- 5.5 English Nature (now Natural England) published a Draft Delivery Plan for the Thames Basin Heaths SPA in May 2006, partly in response to the European Court of Justice ruling of October 2005. This is updated by the 'Thames Basin Heaths Special Protection Delivery Framework' published by the Thames Basin Heaths Joint Strategic Partnership Board in January 2009.
- 5.6 These documents aim to allow a strategic approach to accommodating development by providing a method through which local authorities can meet the requirements of the Habitats Regulations through avoidance and mitigation measures.
- 5.7 In addition, Guildford Borough Council has produced a Thames Basin Heaths Avoidance Strategy (2017), which has identified that between 400m and 5km of the SPA boundary, development will only be possible if it can demonstrate adequate avoidance or mitigation of significant adverse effects through recreational pressure.
- 5.8 The HRA of the adopted LPP1 concluded there would be no adverse effects on the integrity of the SPA either alone or in combination and Policy P5 enables the necessary mitigation measures to be delivered. As LPP2 presents no impact pathways to European sites, it can therefore be concluded no in-combination effects will arise from the LPP2.

## 6. Conclusions

- 6.1 The policies within the Guildford LPP2 are development management policies which set conditions within which developments must comply to ensure the protection of aspects of the Borough such as green space, conservation areas and heritage assets, as well as setting parameters for design of aspects of development including parking, housing density and alterations to current housing stock. No policies within the LPP2 allocate a quantum of residential or business development. All development in Guildford will be governed in part by Policy P5 of LPP1, which specifically sets out the criteria for protecting the Thames Basin Heaths SPA. That policy therefore forms part of the context for LPP2.

---

<sup>37</sup> Liley, D, Jackson, D. & Underhill-Day, J. (2005). Visitor Access Patterns on the Thames Basin Heaths. English Nature Research Report 682. English Nature, Peterborough

- 6.2 No policies were assessed to have a likely significant effect upon the Thames Basin Heath SPA either alone or in combination with other plans or projects. All policies have been screened out as having no linking impact pathways to the European site.
- 6.3 Therefore, it can be concluded that there would be no likely significant effect on the SPA either alone or in-combination from the LPP2.

# Appendix A European Site Background

## Thames Basin Heaths SPA

### Introduction

- 6.4 Thames Basin Heaths consists of a number of fragments of lowland heathland scattered across Surrey, Hampshire and Berkshire. It is predominantly dry and wet heath but also includes area of deciduous woodland, gorse scrub, acid grassland and mire, as well as associated conifer plantations. Around 75% of the SPA has open public access being either common land or designated as open country under the Countryside and Rights of Way Act 2000. The SPA consists of 13 Sites of Special Scientific Interest (SSSI). Three of the SSSIs are also designated as part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC).
- 6.5 Ash to Brookwood Heaths SSSI, Whitmoor Common SSSI, Colony Bog and Bagshot Heaths SSSI and Ockham and Wisley Commons SSSI lie within or partly within Guildford Borough.
- 6.6 The location of the Thames Basin Heaths has resulted in the area being subject to high development pressure. English Nature (now Natural England) published a Draft Delivery Plan for the Thames Basin Heaths SPA in May 2006, partly in response to the European Court of Justice ruling of October 2005. This is updated by the 'Thames Basin Heaths Special Protection Delivery Framework' published by the Thames Basin Heaths Joint Strategic Partnership Board in January 2009. These documents aim to allow a strategic approach to accommodating development by providing a method through which local authorities can meet the requirements of the Habitats Regulations through avoidance and mitigation measures.
- 6.7 In addition, Guildford Borough Council has produced a Thames Basin Heaths Avoidance Strategy (2017), which has identified that between 400m and 5km of the SPA boundary, development will only be possible if it can demonstrate adequate avoidance or mitigation of significant adverse effects through recreational pressure.

### Features of European interest<sup>38</sup>

- 6.8 Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:
- 6.9 During the breeding season:
- Nightjar *Caprimulgus europaeus*: 7.8% of the breeding population in Great Britain (count mean, 1998-1999);
  - Woodlark *Lullula arborea*: 9.9% of the breeding population in Great Britain (count as at 1997);
  - Dartford warbler *Sylvia undata*: 27.8% of the breeding population in Great Britain (count as at 1999).
- 6.10 These species nest on or near the ground and as a result are susceptible to predation and disturbance.

### Conservation objectives

- 6.11 The Conservation Objectives for the European interests on the SSSI are, subject to natural changes:

---

<sup>38</sup> Features of European Interest are the features for which a European site is selected. They include habitats listed on Annex 1 of the Habitats Directive, species listed on Annex II of the EC Habitats Directive and populations of bird species for which a site is designated under the EC Birds Directive.

- to maintain<sup>39</sup>, in favourable condition, the habitats for the populations of Annex 1 bird species+ of European importance, with particular reference to: lowland heathland and rotationally managed plantation.

## Key environmental conditions

6.12 The key environmental conditions that support the features of European interest have been defined as:

- Appropriate management.
- Management of disturbance during breeding season (March to July).
- Minimal air pollution.
- Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species.
- Maintenance of appropriate water levels.
- Maintenance of water quality.

## Potential effects of the plan

6.13 Three potential impacts of the Proposed Submission Local Plan Strategy and Sites upon the SPA have been identified:

- Recreational disturbance.
- Air pollution
- Urbanisation.

---

<sup>39</sup> Maintenance implies restoration if the feature is not currently in favourable condition.

+ Nightjar, woodlark and Dartford warbler.





This page is intentionally left blank

Council Report

Ward(s) affected: All

Report of Managing Director

Author: James Dearling

Tel: 01483 444141

Email: james.dearling@guildford.gov.uk

Lead Councillor responsible: Caroline Reeves

Tel: 07803 204433

Email: caroline.reeves@guildford.gov.uk

Date: 5 May 2020

## **Non-attendance at meetings: Proposed dispensation from the requirements of Section 85 Local Government Act 1972**

### **Executive Summary**

Under the provisions of Section 85(1) of the Local Government Act 1972, if a councillor fails throughout a period of six consecutive months from the date of their last attendance to attend any meeting of the authority, they shall, unless the failure was due to some reason approved by the authority before the expiry of that period, cease to be a member of the authority.

Due to the coronavirus outbreak, the Council is requested to agree that any councillor unable to attend a meeting for a period greater than six months for Covid 19 related reasons, receives a dispensation from the requirements of section 85 until 9 December 2020 (the day after the date of the scheduled full Council meeting in December). The Council could, if necessary, review the position at its meeting on 8 December.

### **Recommendation to Council**

That the Council waives the requirements of Section 85(1) of the Local Government Act 1972 and agrees that any councillor unable to attend a meeting for a period greater than six months for Covid 19 related reasons, receives a dispensation from the requirements of section 85 until 9 December 2020.

### Reason for Recommendation:

To avoid triggering Councillor disqualifications due to non-attendance at meetings for Covid 19 related reasons.

### **Is the report (or part of it) exempt from publication?**

No

**1. Purpose of Report**

- 1.1 To enable Council to waive the requirements of Section 85 of the Local Government Act 1972 by approving a reason for any councillor's failure to attend meetings for a consecutive period of six months if that reason was due to coronavirus outbreak, thus preventing the disqualification of councillors unable to attend meetings, including meetings held remotely, during the period of the current emergency.

**2. Strategic Priorities**

- 2.1 Consideration of this issue is being brought to Council at this time in the interest of good governance and transparency, in addition to supporting those who are vulnerable in terms of being susceptible to coronavirus.

**3. Background**

- 3.1 Section 85(1) of the Local Government Act 1972 states that, if a member of a local authority fails throughout a period of six consecutive months from the date of his/her last attendance to attend any meeting of the authority<sup>1</sup>, he/she shall, unless the failure was due to some reason approved by the Authority before the expiry of that period, cease to be a member of the authority.
- 3.2 Given the coronavirus outbreak, it is requested that Council agrees that any councillor unable to attend a meeting for a period greater than six months for Covid 19 related reasons, receives a dispensation from the requirements of section 85 until 9 December 2020.

**4. Key Risks**

- 4.1 While "attendance" by a councillor for the purpose of satisfying the requirements of Section 85 is fulfilled through remote participation at a virtual meeting<sup>2</sup>, waiving the requirements of Section 85 now and approving a comprehensive reason for any non-attendance if that reason is Covid 19 related, will avoid councillors feeling compelled to attend virtual meetings to avoid disqualification in circumstances where they, or close family members, are suffering from the effects of Covid 19.
- 4.2 If any Councillor loses office through failure to attend for the six-month period, the disqualification cannot be overcome by subsequently resuming attendance nor can retrospective approval of the Council be sought for an extension in time.
- 4.3 Furthermore, it is possible that the opportunity for Council to determine this matter may not arise again before individual Councillors are disqualified through the six-month attendance rule.

---

<sup>1</sup> This includes attendance at meetings of the Executive, a committee or a sub-committee, or any meeting at which the functions of the council are discharged, any meeting which advises the council on any matter relating to the discharge of those functions, or any meeting as a representative of the Council.

<sup>2</sup> now permitted by *The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020*

**5. Financial Implications**

- 5.1 No direct financial implications apply at this time. Normally, the Council would incur the cost of holding a by-election if a councillor becomes disqualified under the Local Government Act 1972, although recently introduced Regulations<sup>3</sup> now provide that all local government by-elections are postponed to 6 May 2021.

**6. Legal Implications**

- 6.1 Remote participation at a virtual meeting will satisfy the attendance requirements of Section 85 of the Local Government Act 1972.

**7. Human Resources Implications**

- 7.1 No human resources implications apply.

**8. Equality and Diversity Implications**

- 8.1 The Council has a statutory duty under section 149 of the Equality Act 2010 which provides that a public authority must, in exercise of its functions, have due regard to the need to (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
- 8.2 This duty has been considered in the context of this report and it has been concluded that there are no equality and diversity implications arising directly from this report.

**9. Climate Change/Sustainability Implications**

- 9.1 No climate change/sustainability implications arise from this report.

**10. Consultation**

- 10.1 Political group leaders were consulted regarding the proposal in this report, all of whom supported the principle.

**11. Summary of Options**

- 11.1 The recommendation and its rationale are presented above.
- 11.2 The alternative is for Council not to waive the requirements of the 1972 Local Government Act to approve an extension for all Councillors. In such

---

<sup>3</sup> *The Local Government and Police and Crime Commissioner (Coronavirus) (Postponement of Elections and Referendums) (England and Wales) Regulations 2020*

circumstances if any Councillor failed to attend a meeting for a period of six consecutive months and the Council could not before the end of that period meet to approve a reason for that failure, a casual vacancy would arise.

**12. Conclusion**

- 12.1 This report requests Council waives the requirements of Section 85(1) of the Local Government Act 1972 and agrees that any councillor unable to attend a meeting for a period greater than six months for Covid 19 related reasons, receives a dispensation from the requirements of section 85 until 9 December 2020. If necessary, the Council can review this matter at its meeting scheduled for 8 December and, if necessary extend the dispensation for a further period.
- 12.2 As discussed above, whereas attendance through remote participation at a virtual meeting would satisfy the requirements of Section 85, waiving the requirement locally now and approving a comprehensive reason for any non-attendance if that reason is Covid 19 related is fair and sensible.

**13. Background Papers**

None

**14. Appendices**

None

Council Report

Ward(s) affected: n/a

Report of the Head of Paid Service

Author: John Armstrong

Tel: 01483 444102

Email: john.armstrong@guildford.gov.uk

Date: 5 May 2020

## Designation of Monitoring Officer

### Executive summary

The Resources Specialist Services Manager (formerly the Council Solicitor and Monitoring Officer), Robert Parkin, left the Council on 20 March 2020 to take up an appointment elsewhere.

Consideration of the recruitment of a new Resources Specialist Services Manager will be given following a review of the structure of the legal team. In the meantime, it will be necessary to designate an officer as the Council's Monitoring Officer. In accordance with Officer Employment Procedure Rule 4 (a), the formal designation of the Monitoring Officer is undertaken by full Council on the recommendation of the Employment Committee.

At its meeting held on 6 March 2020, the Employment Committee considered this matter and endorsed the recommendation below.

### Recommendation:

- (1) That Sarah White (Senior Specialist - Legal (Lawyer - Planning, Regeneration & Litigation)) be designated as the Monitoring Officer for the Council with effect from her return to work following maternity leave in May 2020.
- (2) That, in the interim period and for the working days when the Monitoring Officer is not in attendance, Diane Owens (Senior Specialist - Legal (Lawyer - Corporate, Commercial & Property)) be designated as Acting Monitoring Officer.

### Reason for Recommendation:

To comply with the requirements of the Local Government and Housing Act 1989 (as amended).

**Is this report (or part of it) exempt from publication? No**

### 1. Purpose of Report

- 1.1 To designate an officer of the Council as the officer responsible for performing the duties imposed by Section 5 of the Local Government and Housing Act 1989 (as amended), that is, the Monitoring Officer.

### 2. Background

- 2.1 Under Section 5 of the Local Government and Housing Act 1989 (as amended) ("the 1989 Act"), the Council has a duty to designate one of its officers as Monitoring Officer.

- 2.2 The Monitoring Officer has a number of statutory duties and responsibilities relating to the Council's Constitution and our arrangements for effective governance. These duties include maintaining the Constitution, ensuring that no decision or omission of the Council is likely to give rise to unlawfulness or maladministration and promoting high standards of conduct. A full list of the Monitoring Officer's responsibilities and delegated powers is included within the Council's Constitution (see Part 2 (Article13)).

### **3. Designation of Monitoring Officer**

- 3.1 A local authority has general flexibility to appoint whatever officers it thinks fit. Despite this general flexibility, there are a number of statutory exceptions.
- 3.2 The 1989 Act (Section 5) provides that the Council must designate a Monitoring Officer to check on the correctness and propriety of the authority's decisions. The Monitoring officer may not also be Head of Paid Service or the Council's Chief Finance Officer. The Monitoring Officer has power, under Section 5A of the 1989 Act, to nominate deputies.
- 3.3 The Resources Specialist Services Manager (formerly the Council Solicitor and Monitoring Officer), Robert Parkin, left the Council on 20 March 2020 to take up an appointment elsewhere.
- 3.4 Consideration of the recruitment of a new Resources Specialist Services Manager will be given following a review of the structure of the legal team. In the meantime, it will be necessary to designate an officer as the Council's Monitoring Officer. In accordance with Officer Employment Procedure Rule 4 (a), the formal designation of the Monitoring Officer is undertaken by full Council on the recommendation of the Employment Committee.
- 3.5 It was recommended to the Employment Committee, at its meeting on 6 March 2020, that Sarah White (Senior Specialist Legal – (Lawyer - Planning, Regeneration & Litigation)) be designated as the Monitoring Officer for the Council with effect from her return to work following maternity leave in May 2020. Sarah will be returning on a part-time basis. In the interim period and for the working days when the Monitoring Officer is not in attendance, it is proposed that Diane Owens (Senior Specialist - Legal (Lawyer - Corporate, Commercial & Property)) be designated as Acting Monitoring Officer. Joan Poole would continue in her current role as Deputy Monitoring Officer. The Employment Committee endorsed this approach and the recommendations in this report.

### **4. Financial Implications**

- 4.1 The Monitoring Officer and Deputy Monitoring Officer are paid honoraria of £5,300 and £1,500 per annum respectively, which are met from existing budgets.

### **5. Legal Implications**

- 5.1 These are set out in the report.

### **6. Human Resource Implications**

- 6.1 There are no further human resource implications.

### **7. Background Papers**

None

### **8. Appendices**

None



## EXECUTIVE

7 January 2020

- \* Councillor Caroline Reeves (Chairman)
- \* Councillor Fiona White (Vice-Chairman)

- |                             |                             |
|-----------------------------|-----------------------------|
| * Councillor Joss Bigmore   | * Councillor Julia McShane  |
| * Councillor Angela Goodwin | * Councillor John Rigg      |
| * Councillor David Goodwin  | * Councillor Pauline Searle |
| * Councillor Jan Harwood    | * Councillor James Steel    |

\*Present

Councillors Dennis Booth, Angela Gunning, Ramsey Nagaty, John Redpath, Tony Rooth and Deborah Seabrook were also in attendance.

### **EX67 APOLOGIES FOR ABSENCE**

There were no apologies for absence.

### **EX68 LOCAL CODE OF CONDUCT - DISCLOSABLE PECUNIARY INTEREST**

In relation to agenda item 7, the following non-pecuniary interests were disclosed:

Councillor Caroline Reeves was a Trustee of Guildford Action.  
Councillor Julia McShane was the Council's representative on the Surrey Lifelong Learning Partnership, Guildford Action and Guildford Philanthropy  
Councillor Pauline Searle was a patron of Homestart  
Councillor Fiona White was the Council's representative and a Trustee on Guildford Citizens Advice

Councillor Joss Bigmore disclosed a pecuniary interest in relation to Item 8 in that he and his wife were landlord owners of property in Guildford. Councillor Bigmore absented himself from the meeting during the consideration of Item 8.

Councillor James Steel disclosed a non-pecuniary interest in relation to Item 8 in that he was a tenant in a House in Multiple Occupation (HMO), a member of the "Cut the rent" Committee at the University of Surrey and a member of the Guildford Private Renters Association.

### **EX69 MINUTES**

The minutes of the meeting of the Executive held on 26 November 2019 were confirmed as a correct record.

### **EX70 LEADER'S ANNOUNCEMENTS**

The Leader of the Council made two announcements. First, that Surrey County Council had confirmed £1 million funding for a project that would improve bus services in Guildford, particularly with regard to the provision of 'real time' information at bus stops. It would also become possible to request developer contributions for the provision of 'real time' services when planning applications were submitted in appropriate cases.

Second, the Leader relayed residents' concerns about the use of sky lanterns and would be seeking legal advice on how we might discourage local people from using sky lanterns and launching them from Council owned land.

## **EX71 SHALFORD COMMON LAND MANAGEMENT**

The Lead Councillor for Countryside, Rural Life and the Arts introduced the report.

It was noted that Shalford Common was registered as common land and that Guildford Borough Council as the freehold owner had a duty to protect and manage the Common as set out in the Commons Act 2006. The Council had been in receipt of complaints about car parking on the Common over many years and such activity was in breach of commons legislation. In response, the Executive was asked to consider measures drawn up in an action plan in respect of car parking, access onto the Common, leisure activities and highway improvements to ensure the council was in compliance with its statutory duty to protect the Common and to reduce the number of local conflicts and complaints.

It was proposed that such measures be applied to seven priority areas and consist of a combination of designated car parking, physical measures to prevent unauthorised access and the enforcement of such through new byelaws. Public consultation would be a statutory requirement to introduce new byelaws and the proposed changes to registered Common Land.

Public speaker, Mr Ivor Thomas described the area of the Common around the village sign as still vulnerable to parking damage and that provision for parking in support of local business was adequately provided in Kings Road without designating a part of the Common into parking bays.

The meeting was also addressed by the Chairman of Shalford Parish Council, a local businessman and an ex-parish councillor for Shalford who expressed their views on the proposals. The Lead Councillor welcomed their views and the forthcoming public consultation which would provide the opportunity to capture the opinion of users of the Common.

The Executive

RESOLVED:

- (1) That the options for seven priority areas on the Common, as set out in the report submitted to the Executive, be put forward for public consultation.
- (2) That an action plan be implemented to comply with commons legislation for car parking, access, leisure activities and highway improvements.
- (3) That a public consultation be carried out as part of the action plan.
- (4) That the introduction of new byelaws and revocation of existing byelaws for Shalford Common to support the proposed actions be approved in principle, subject to approval of full Council.

Reasons:

- Compliance with Guildford Borough Council's statutory obligations as landowner to protect Shalford Common from encroachments in line with the Commons Act 2006 including the prevention of unauthorised parking
- Reduction of conflicts and complaints regarding un-authorised car parking
- Provision of car parking areas compliant with the Commons Act 2006
- Protection of biodiversity on Shalford Common which is a designated SNCI

## **EX72 RIPLEY VILLAGE HALL FORWARD FUNDING PROPOSAL**

The Lead Councillor for Assets and Finance, Customer Services introduced the report.

Built in the 1970s, Ripley Village Hall was designed to last for up to 25 years. It was now in a poor state and nearing the end of its useful life. There was a need for a replacement hall to meet the need for community facilities in the village. Planning permission for a new village hall was granted in February 2019. Ripley Village Hall Trustees had raised funds locally to help pay for the new village hall and Ripley Parish Council had taken a £500,000 loan from the Public Works Loan Board. Although significant funds had been raised, there was still a funding shortfall of £600,000 for the main village hall and Trustees had asked the Borough Council for a contribution.

The Executive was asked to consider granting a cashflow loan drawn from future S106 monies to be received from the Garlick's Arch site which had been allocated in the Council's adopted Local Plan for development. In addition, if the development of Garlick's Arch were to proceed the Council anticipated receiving a New Homes Bonus (NHB) grant. The amount of the loan would be determined if, and when, planning permission for the Garlick's Arch was granted and the Council signed a S106 agreement with the developer. The value of the loan would not exceed any agreed S106 contribution due to Ripley together with 30% of the anticipated NHB grant from the development.

However, given the urgency of the matter and on approval from the Executive, it was proposed that a contribution of £25,000 (as an upfront payment of the 30% NHB grant from the development) funded from the new homes bonus reserve, would be paid to the Trust to enable them to proceed to the next stage of the development. Repayment for the loan would be at the point the Council received the S106 contribution from the developer and the NHB income from the government. If, for any reason, the S106 monies were not received following a signed S106 agreement, the Village Hall Trust would be asked to enter into a repayment plan for the loan over a period of 50 years.

Suzie Powell-Cullingford and Derek Austin of the Ripley Village Hall Trust addressed the meeting and endorsed the proposals. The Executive considered the proposal to be a singular matter of assistance that would not set a precedent amongst other parish councils.

The Executive

**RESOLVED:**

- (1) That a cashflow loan be provided to Ripley Village Hall Trust, to be repaid from S106 contributions for community use in Ripley and 30% of the New Homes Bonus grant anticipated from the Garlick's Arch Development.
- (2) That the exact sum of the loan be agreed by the Director of Resources in consultation with the Lead Councillor for Finance, Assets, and Customer Services once planning permission is in place and a S106 agreement is signed.
- (3) That the loan amount shall not exceed the S106 and NHB funding available to the Council.
- (4) That an upfront payment of the loan of £25,000 be made from the Council's new homes bonus reserve, which will be part of the 30% NHB contribution towards the scheme.

**Reason:**

To enhance community facilities in Ripley by supporting and making a contribution towards the redevelopment of the Village Hall.

## EX73 REVIEW OF GRANTS

The Lead Councillor for Community Health, Support and Wellbeing introduced the report.

The Executive was asked to consider a report setting out recommended changes to the way in which financial support could be offered by the Council to local voluntary and community organisations in future. These changes were centred around the mechanisms being made available for voluntary and community organisations to raise funds, such as the Guildford Community Lottery and the proposed Guildford crowdfunding platform.

In recognition of the commitments within the Corporate Plan there were proposals to increase funding available for voluntary organisations working with priority groups, such as homelessness, mental health services, support for vulnerable families and services for the elderly. In particular, there was a proposal to increase funding of the core service provision of both Guildford and Ash Citizens Advice.

It was recommended such changes should come into effect in readiness for implementation in the 2021-22 financial year. The Voluntary Grants and Community Grants Schemes would continue to operate in the usual way for the last time during 2020 for funding in the 2020-21 financial year.

The Executive

RESOLVED:

- (1) That the Council enters into funding agreements for the services provided by the following organisations and that the sums indicated below be included in the 2021-22 budget for this purpose:

Guildford Action Day Service	£90,000
Citizens Advice County Court Service	£5,000
Guildford Action for Families	£30,000
Home Support Services Guildford	£20,000
Oakleaf Enterprise	£20,000
Canterbury Care Centre	£20,000
Homestart	£5,000

- (2) That a revised Voluntary Grants Scheme with an annual budget of £50,000 be retained to provide financial support for organisations working with the most vulnerable and disadvantaged residents.
- (3) That funding for the core service provision of Guildford and Ash Citizens Advice be increased by 10% with effect from 2021-22, to the following total amounts:

Guildford Citizens Advice	£235,300
Ash Citizens Advice	£76,450

- (4) That the Community Grants Scheme be replaced by a new Aspire Grants Scheme with an annual budget of £30,000.
- (5) That the Managing Director, in consultation with relevant Lead Councillors, be authorised to make all necessary arrangements to implement the new funding arrangements set out in the report submitted to the Executive, including determining the detailed eligibility criteria and rules for the operation of the revised grant schemes.

- (6) That the establishment of a Guildford crowdfunding platform to provide financial support for projects being promoted by local community groups and organisations be approved.
- (7) That the allocation of £160,000 from the New Homes Bonus Reserve to fund the operating costs of the proposed crowdfunding platform and the Council's financial contribution to eligible projects for a two-year trial period be approved.
- (8) That the Managing Director be authorised to investigate and, if appropriate, make all necessary arrangements to establish a joint crowdfunding platform with Surrey County Council.
- (9) That the Managing Director be authorised to seek tenders for the establishment and operation of a Guildford crowdfunding platform and to appoint the most suitable provider.
- (10) That, subject to paragraph (8) above, the Managing Director be authorised to make all necessary arrangements for launching and administering the proposed new crowdfunding platform, including determining the detailed eligibility criteria for voluntary and community organisations wishing to raise funds and making financial contributions towards qualifying projects.

Reason:

To ensure that the Council's support for voluntary and community organisation meets Corporate Plan priorities of supporting those with the greatest needs, whilst maintaining funding streams for local projects that enhance our communities.

**EX74 EXTENSION OF PRIVATE RENTED SECTOR ENFORCEMENT POWERS**

The Lead Councillor for Housing, Access and Disability introduced the report.

The Executive was advised of new legislative powers for Regulatory Services Housing Standards teams to improve housing standards in the private rented sector which would enable financial penalties to be imposed as an alternative to prosecuting offenders.

The Executive was asked to approve a proposed charging structure for such penalties and to delegate authority to the Regulatory Services Manager to determine the amount of any financial penalty in accordance with the charging structure.

It was noted that the amount of rented accommodation and Housing with Multiple Occupation (HMOs) had vastly increased in recent years and continued to expand. It was important that tenants were protected and the new regulations would send a strong message.

The Executive

**RESOLVED:**

- (1) That the charging structure for financial penalties imposed in accordance with the powers introduced by Section 126 of the Housing and Planning Act 2016 as set out in Appendix 1 to the report submitted to the Executive, be approved.
- (2) That the Regulatory Services Manager be authorised to implement the charging structure and make any necessary arrangements to ensure the procedure is process driven with a consistent approach.

Agenda item number: 12

Reason:

To enable the Council to exercise the powers introduced by Section 126 of the Act to impose financial penalties as an alternative to prosecution for certain offences under the Housing Act 2004.

**EX75 PUBLIC HEALTH FUNERALS**

The Lead Councillor for Personal Health, Safety and Wellbeing introduced the report.

The Executive was asked to consider a draft public health funeral policy that had been prepared in readiness for public consultation. The policy set out the Council's role and responsibilities and the level of funeral provision to provide a dignified, value for money funeral service.

It was noted that the frequency of public health funerals and consequently the cost to the Council was low, but that it was right to have policy guidance in place. It was requested that the draft policy make explicit that where an individual had no estate that the Council would pay the funeral costs.

The Executive

RESOLVED:

That a 6-week consultation on the draft Public Health Funeral Policy, as set out in Appendix 1 to the report submitted to the Executive, be approved, subject to an amendment to paragraph 3.2 to the effect that where the cost of the funeral arrangements cannot be recovered from the deceased's estate, the Council would cover the cost.

Reason:

To ensure that Public Health Funerals are conducted in a fair and transparent way and that the deceased's estate is managed in line with the current legislation and guidance

**EX76 DIGITAL GAMES HUB FUNDING PROPOSAL (ROCKETDESK GUILDFORD RIVERSIDE)**

The Executive was asked to consider a funding proposal for a new dedicated digital games co-working space in the town centre. Under the proposals highlighted in the report the council would, in conjunction with the Enterprise M3 Local Enterprise Partnership, jointly match-fund the capital expenditure for setting up the new facility. The facility would be owned and run by the proprietors of the Rocketdesk Co-working space on the Surrey Research Park (the new facility would be branded 'Rocketdesk Guildford Riverside).

The report was welcomed and the proposal described as a very positive step forward for a business sector that was important to Guildford.

The Executive

RESOLVED: That funding of £40,000 to Rocketdesk Guildford Ltd. be approved to support economic growth and that such funding shall comprise:

1. A funding grant of £10,000 from existing budgets; and
2. A deferred loan of £30,000, to be repaid over a 24-month period, funded from the business rates equalisation reserve.

Reason:

This proposal will directly support the growth and development of the Digital Games sector in the Borough which is a priority in both the Council's Corporate Plan and Innovation Strategy.

**EX77 WEYSIDE URBAN VILLAGE DEVELOPMENT**

The Executive was asked to consider an update on the progress of the Weyside Urban Village Project (formerly known as the Slyfield Area Regeneration Programme) and to authorise the Managing Director, in consultation with the Leader of the Council, to sign and complete the grant agreement with Homes England to implement the infrastructure works and to draw down the grant expenditure.

The Executive was also requested to recommend to Council a capital budget to enable the council to act as Infrastructure Developer and to deliver the infrastructure phase of the project. The project had been in development for a period of fifteen years and was described as one of the most discussed projects for the council. An increase in project costs was noted and the project team would seek to mitigate and make savings wherever possible as the project progressed.

The Executive

**RESOLVED:**

That the Managing Director be authorised, in consultation with the Leader of the Council, to sign and complete the Grant Agreement with Homes England to implement the infrastructure works and draw down the grant expenditure.

The Executive further

**RECOMMENDED (to Council):**

- (1) That an additional capital supplementary estimate of £274.057 million be approved to allow a total capital budget of £359.504 million to enable the Council to deliver the infrastructure phase of the Weyside Urban Village Development.
- (2) That £5.781 million of the additional capital budget be placed on the approved capital programme to progress the allotment relocation and funding of the Thames Water agreement costs during 2019-20.
- (3) That the Council acts as Infrastructure Developer until completion of the Thames Water Infrastructure in 2026.

Reasons:

There are financial, economic and social benefits:

The budget would enable the Council to deliver the infrastructure for the development ensuring deliverability and control.

The land value would be increased by the infrastructure phase being delivered upfront and ahead of Land Parcel Sales.

The project would also deliver:

Agenda item number: 12

- 1500 new homes including 600 Affordable Homes
- 2000 square metres of community space
- 6500 square metres of employment space
- A new relocated fit for purpose Thames Water Sewage Treatment Works
- Extensive infrastructure improvements
- This scheme contributes to the delivery of the adopted Local Plan
- This scheme contributes £233 million in economic impacts for Guildford

The project has significant infrastructure to be put in place to enable the above critical success factors to be delivered. Allocating the capital budget would enable all of the infrastructure phase to be delivered and would de-risk the site in readiness for the next stage to facilitate the delivery of homes.

#### **EX78 WALNUT BRIDGE - APPLICATION FOR ADDITIONAL FUNDING**

The Chairman asked councillors present at the meeting to note that the appendices to the committee report contained exempt information about infrastructure costs designated as such under Paragraph 3, of Part 1 of Schedule 12A to the Local Government Act 1972. Discussion of those appendices would require the meeting to exclude the public.

It was further noted there was an error in the report to the Executive on page 158 para 3.17 (f). The figure should read “£500,000”.

The Lead Councillor for Planning, Regeneration and Housing Delivery introduced the report. It was acknowledged that the replacement of Walnut Bridge had a long history, initially identified in 2012 in the Guildford Interim Town Centre Framework and again in 2014 when it was identified as a priority in the Guildford Town and Approaches Movement Study (GTAMS). The project was subsequently awarded LEP funding as part of the “Unlocking Guildford, Guildford Town Centre Transport Package” in 2014. It formed one of a number of projects and interventions which together would help alleviate congestion in the Town Centre.

In July 2016, the Executive had formally approved the project to replace Walnut Bridge. The replacement would provide improved access to the town centre from the station and was in anticipation of the significant developments expected in the immediate area. There was concern that the existing Bridge was too narrow to accommodate the increasing flow of pedestrians and cyclists. The new Bridge would be wider than the existing bridge, facilitate two-way cycle flow and be fully accessible. It would also lie on a more obvious alignment to encourage use by new and infrequent users as well as local people familiar to the area. Additionally, it would be seen as a catalyst for regeneration in the Bedford Plaza and Bedford Wharf area thereby becoming a critical access corridor from the Station through to the High Street. Finally, it would encourage more sustainable travel and reduce the need for cyclists to have to use the Gyratory. The bridge had received planning permission in 2018.

The Executive was informed that it was proposed to reincorporate the Bedford Plaza Public Realm works into the Bridge project primarily because the lighting design of Bedford Plaza including the Bridge had been included in these works. The planning permission for the Bridge required that the public realm works be completed within six months of the completion of the Bridge. This would mean that it was possible the Bridge could not be opened after completion until public realm works were completed unless a temporary lighting system was installed. There was therefore a case to be made for these to be undertaken with the Bridge works. This could allow for economies of scale, savings in mobilisation costs etc. and could provide some additional funding from its £500,000 budget to be brought into the Bridge project.

The Executive were asked to consider three recommendations. To address a funding gap in the Walnut Bridge project by means of a transfer from the capital contingency fund of £450,000. Secondly, that the Bedford Plaza Public realm works be incorporated within the Walnut Bridge



Project. Finally, £350,000 be transferred from the provisional to approved capital budget to fund the public realm work.

Prior to the formal consideration of the matter, Mr David Smith addressed the Executive in support of the replacement of Walnut Bridge as soon as possible.

During the formal debate, it was generally agreed that Walnut Bridge should be replaced at some stage, but the discussion centred on the cost, design and timing of the project. Two members of the Executive were opposed to providing additional funding to support the proposed design. There were concerns expressed that the level of the increased cost of the project was not acceptable. It was further argued that the project should be put on hold or a temporary structure be installed until there was a more suitable design in keeping with the proposed new Bedford Wharf public realm landscape.

In response, there were arguments concerning the immediate safety of the bridge, the safety of users of the bridge, the impact of the existing design on accessibility and the role of the bridge in realising sustainable transport plans for the town centre. It was argued that a delay in completion of the bridge would not be acceptable to local people. It was noted that if the design of the bridge were changed a new planning application could be required so increasing the cost and timescales further and that the LEP funding would need to be returned if not utilised for the bridge project within the year possibly making the project unfeasible. The meeting heard that should the Executive approve the recommendations infrastructure spending would attract further funding in the future and that there may be some flexibility on the design of the bridge within the parameters of the existing planning permission.

There followed a discussion concerning the designation of some financial information as exempt. It was explained that contractor bids as part of the tendering process must be kept confidential. Once a contract had been agreed the overall budget would be reported to the Corporate Governance and Standards Committee along with regular updates to the Executive as the project progressed. Revised budget figures would also be reported at the end of the year and would become public in due course.

In order to consider the exempt information referred to the above, the Executive

RESOLVED: That, under Section 100A (4) of the Local Government Act 1972 (as amended) and Regulation 5 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the public be excluded from the meeting for the consideration of information contained in the Appendices to the report on the grounds that it involved the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the 1972 Act.

Having considered the matter and readmitted the public to the meeting, the Executive

RESOLVED:

- (1) That a virement of £450,000 be transferred from the capital contingency fund for the Walnut Bridge Project
- (2) That the Bedford Plaza Public realm works be incorporated within the Walnut Bridge Project.
- (3) That £350,000 be transferred from the provisional to approved capital budget to fund the public realm work.

Reasons:

It had become apparent that there was a funding gap and a virement of £450k was required to get this project completed.

The assimilation of the Bedford Plaza Public Realm works into the Bridge project was twofold:

Agenda item number: 12

1. To combine the lighting design for both schemes within the main Bridge Contract and
2. To leverage some of the associated budget for use on the Bridge project through economies of scale and mobilisation costs etc.

The budget for the public realm works would need to be transferred to the approved budget to enable the work to proceed.

**EX79 EXCLUSION OF THE PUBLIC AND PRESS**

The Executive

RESOLVED: That under Section 100A (4) of the Local Government Act 1972 (as amended) and Regulation 5 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the public be excluded from the meeting for the following item of business on the grounds that it involved the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act.

**EX80 WOODBRIDGE ROAD SPORTSGROUND PAVILION REFURBISHMENT - SETTLEMENT OF THE FINAL ACCOUNT FOR WORKS**

The Leader of the Council introduced the report.

The Executive had approved a budget of £1.9 million on 19 July 2016 to refurbish and rebuild the Guildford Sportsground Pavilion at the Guildford Sportsground, registered charity (305056). The refurbishment of the Woodbridge Road Sportsground Pavilion was completed in April 2018. Since April 2018 work had been ongoing to see through the defects liability period and settle the final account for the project. The Executive considered a report which set out the end accounting for the project. In consultation with the Leader of the Council, Lead Councillors and Monitoring Officer, the Managing Director had settled the final accounts which represented value for money to the Council.

A post project review would be considered by the Overview and Scrutiny Committee in due course.

The Executive

RESOLVED: That the use by the Managing Director of the delegated power to act in relation to matters of urgency in respect of this matter, be noted.

Reason:

To report decisions in accordance with the Council's Constitution

The meeting finished at 9.07 pm

Signed .....

Date

Chairman

## EXECUTIVE

21 January 2020

- \* Councillor Caroline Reeves (Chairman)
- \* Councillor Fiona White (Vice-Chairman)

- |                             |                             |
|-----------------------------|-----------------------------|
| * Councillor Joss Bigmore   | * Councillor Julia McShane  |
| * Councillor Angela Goodwin | * Councillor John Rigg      |
| * Councillor David Goodwin  | * Councillor Pauline Searle |
| * Councillor Jan Harwood    | * Councillor James Steel    |

\*Present

Councillors Dennis Booth, Tony Rooth, and Patrick Sheard were also in attendance.

### EX81 APOLOGIES FOR ABSENCE

There were no apologies for absence.

### EX82 LOCAL CODE OF CONDUCT - DISCLOSABLE PECUNIARY INTEREST

There were no disclosures of interest.

### EX83 LEADER'S ANNOUNCEMENTS

The Leader announced that she would be circulating details of a number of initiatives regarding the proposed Town Centre Masterplan to all councillors.

### EX84 NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The Executive noted that, on 23 July 2019, the Council, along with many other councils including Surrey County Council, declared a Climate Emergency. As part of this resolution, the Council had also committed to calling on the UK government to provide the powers, resources and funding support to make local, as well as national, action against climate change possible. A further motion was agreed by Full Council on 3 December 2019 that stated:

*“The Council recognises that the National Planning Policy Framework (NPPF) has recently undergone a review. However, with the now declared Climate Emergency (subsequent to that review), and the widespread support of the principle of building on brownfield before greenfield sites wherever possible, the Council asks the Executive to request the Secretary of State to hold an immediate further review of the NPPF and its guidance to:*

- (1) Recognise the declared Climate Emergency and provide more detailed guidance on creating “sustainable development”, which takes into account the required actions on transport and development to meet Carbon Zero, for both brownfield and green field sites.*
- (2) Better assist with brownfield delivery by granting councils simple effective powers to bring forward currently, as well as previously, used sites.*
- (3) Amend Paragraph 145 of the NPPF – to correct the unintended consequences in Greenbelt areas of enabling unrestricted building of inappropriate houses through ‘infilling’, yet at the same time preventing residents from having a simple extension or garage for their own home.”*

Agenda item number: 12

The Executive considered a report setting out a draft letter to the Secretary of State for formal approval and

RESOLVED: That the draft letter to the Secretary of State requesting a further review of the NPPF and its guidance, attached as Appendix 1 to the report submitted to the Executive, be finalised and sent by the Lead Councillor on behalf of the Executive to the Secretary of State for Housing, Communities and Local Government.

Reason:

To address the motion agreed by full Council on 3 December 2019.

**EX85 NEW CORPORATE PRIORITIES AND CORPORATE PLAN**

The Executive noted that the Council had approved its current Corporate Plan for the period 2018 to 2023 at its meeting on 15 May 2018. However, since the Borough Council elections in May 2019, members of the Executive had discussed new corporate priorities. A list of draft priorities was developed across the four following strategic themes:

Climate Change and Environment  
Housing and Community  
Economy and Regeneration  
Improved Council

The Executive considered a report which set out new draft corporate priorities for public consultation and proposed a timetable and process for developing a new corporate plan.

The draft priorities had been the subject of a workshop for all councillors held on 13 November 2019. The workshop had focussed on defining the outcomes and impacts that the Council would most wish to deliver under the following draft priorities:

Climate Change and Environment

- Working with residents and businesses towards becoming a carbon neutral borough
- Protecting our environment
- Making travel easier and more sustainable

Housing and Community

- Providing the housing that people need
- Caring for people who need our help
- Keeping the community active and well

Economy and Regeneration

- Encouraging sustainable, clean economic growth
- Supporting businesses to provide the jobs people need
- Regenerating Guildford town centre

Improved Council

- Using new ways of working to improve value for money and customer service
- Improving transparency, consultation and community engagement

The Executive noted that the report had also been considered by the Joint Executive Advisory Board at its meeting held on 9 January 2020, and their comments were taken into consideration by the Executive.

The Executive

RESOLVED:

- (1) That the new draft corporate priorities for the Council, as set out in paragraph 3.2 of the report submitted to the Executive and referred to above, be approved for public consultation purposes, subject to the amendment of the priority "Providing the housing that people need" to read: "*Residents to have access to a good quality home that meets their needs at a price they can afford*".
- (2) That the proposed process and indicative timetable for the production of a new corporate plan, as set out in the report, be approved.
- (3) That the Managing Director be authorised, in consultation with Group Leaders, to appoint a councillor working group to support the development of the new corporate plan.

Reason:

To enable the Council to develop new corporate priorities and a corporate plan to provide the strategic framework for managing our business and resources effectively.

**EX86 ASSET DISPOSAL FOR LESS THAN BEST CONSIDERATION**

The Executive noted that the Council owned a large property portfolio, the majority of which was held either for investment purposes or for operational purposes such as the Millmead offices or the day centres.

The Council owned a small number of operational properties that it retained to enable other organisations to support the general wellbeing of our communities. Examples ranged from local sports clubs to organisations such as Guildford Action supporting our work with homeless people. These organisations were generally either third sector or voluntary in nature and had limited financial means. The Council, by allowing them to rent one of its properties at below market rental levels, enabled the provision of services that might not otherwise be provided.

The decision to dispose of its property assets at less than market value currently rested in all cases with the Executive. For cases where the proposed reduction was relatively small the process was somewhat burdensome. The Executive considered a report which sought approval for a streamlined approach to such cases and involved the delegation such decisions to officers in consultation with the Lead Councillor for Finance and Assets.

The Council would also benefit from introducing a clear process for assessing disposals of land and buildings where the disposal would be below market value.

The report had also sought authority to take immediate action to complete the leasing of ten Council-owned buildings for less than best consideration to generate an income for the Council and provide accommodation to community-based organisations that supported the general wellbeing of our communities.

Having considered the report, the Executive

RESOLVED:

- (1) That the grant of the nine leases with terms, as set out in Appendices 3 and 4 to the report submitted to the Executive, be approved.
- (2) That a new procedure for the Council to follow when considering and approving the disposal of land and buildings (including leases) for less than best consideration, as set out in Appendix 1 to the report, be adopted.
- (3) That the Head of Asset Management be authorised, in consultation with the Chief Finance Officer, the Lead Councillor for Finance and Assets, Customer Service and the relevant lead councillor, to accept terms for the disposal of assets for less than the best consideration that can reasonably be obtained where the undervalue (the difference between the market value and the proposed transaction) is £30,000 or less and, for lease transactions, the lease term is 15 years or less.

Reasons:

To secure the letting of various Council-owned buildings that will both generate an income for the Council and provide accommodation to community-based organisations that support the general wellbeing of our communities and apply a robust but streamlined approach for future disposal of assets for less than best consideration.

**EX87 OFF-STREET PARKING BUSINESS PLAN 2020-21**

The Executive considered an update report on progress made in delivering the recommendations contained in the Business Plan approved in January 2019 and sought approval for a number of changes to arrangements for 2020-21.

The report highlighted a number of improvements completed, including contactless payment at Bedford Road MSCP, increases in electric charge points and significant investments to maintain the high standard of our car parks. The report also highlighted work to look into how green initiatives could be supported by creating energy from Solar panels. The Guildford Parking Annual Report appended to the report highlighted an increase in ticket sales of 2% and revenue of 0.3%. It was clear that our car park charges compared well and were better value than most major shopping destinations in the region.

Having considered the proposals, the Executive

RESOLVED:

- (1) That the Monday to Saturday and Sunday 'daytime' charges across off-street car parks be held at the current levels to support the town centre economy, except for those at Farnham Road MSCP, Bedford Road Surface, Commercial Road 2, Mary Road and Old Police Station car parks.
- (2) That a discounted 'early-bird' rate of 90p per hour be introduced at Farnham Road MSCP, instead of the present £1 per hour, for those that enter the car park before 7.00am, and that the maximum daily charge of £7.20 be levied for these users, instead of the standard £8.00.
- (3) That the hourly Monday to Saturday 'daytime' rate in Bedford Road Surface, Commercial Road 2, Mary Road and Old Police Station car parks for stays up to 3 hours in duration be increased from £1.30 per hour to £1.50 per hour, and that from April 2021 all tariffs across

the town centre car parks be increased by 10p per hour, or equivalent thereof, in respect to season tickets and contract parking rates.

- (4) That the Monday to Friday and Monday to Saturday season ticket and pre-payment card charges in York Road MSCP be increased by 5%.
- (5) That approval be given to on-street residents' permit holders for Areas A, B and D to park in all the town centre pay and display car parks until 10am the next day (Monday to Saturday) rather than 8am, if they purchase and display a valid pay and display ticket for the previous evening between 6pm and 10pm,
- (6) That the decking of Leapale Road MSCP car park be coated to improve the service life of the structure, in a similar fashion to that already present in Bedford Road MSCP and Castle MSCP, and that as part of the project, the spaces be increased in size / reduced in number (from 384 to around 300), to improve circulation within the car park and encourage greater use, particularly by users with mobility issues, those with young families, and electric vehicles.
- (7) That the EV charging spaces be enforceable, and that the necessary changes to the traffic regulation order required to achieve this be advertised, objections invited, and that if any representations are received, these be considered and determined by the Parking Manager in consultation with the Lead Councillor.
- (8) That the performance of Parking Services in 2018-19, as detailed in Appendix 1 to the report submitted to the Executive, be noted.

Reasons:

- (i) In recent years, the incremental increases in tariffs have not impacted the overall usage of the car parks. This is in spite of the challenging conditions being experienced by the retail sector within 'the high street'. The relatively modest changes to the pricing structure introduced in York Road MSCP and North Street car parks in April 2019 have continued this trend (see Appendix 1).

As was the case in 2019-20, the plan for 2020-21 is again to hold the price of parking in the vast majority of car parks with a few notable exceptions, namely Farnham Road MSCP, Bedford Road Surface, Commercial Road 2, Mary Road and Old Police Station car parks,

- (ii) Farnham Road MSCP is the primary long-stay car park within the town. To reflect this, the charges in this car park are lower than the short/medium-stay town centre car parks.

Access to this car park, for those travelling from all directions other than the west, involves driving around the Bridge Street gyratory system. At peak times, congestion can be an issue, albeit that this is a wider issue, rather than one specifically caused by the operation of this car park.

To encourage users of Farnham Road MSCP to arrive within the car park before the morning peak of the rush hour, it is proposed that the hourly rate for those arriving before 7am Monday to Saturday, be reduced from the current £1 per hour, to 90 pence per hour, for the duration of their stay. The maximum daily charge for users that arrive earlier will reduce from £8.00 to £7.20. It is hoped these changes will reduce congestion and assist with the town's Air Quality and Climate Change target.

- (iii) Currently, all the main short and medium-stay town centre car parks have a standardised charging structure. Whilst this is the case, it is evident that the surface car parks are often more popular than the multi-storey car parks. Indeed, queues can sometimes form

on the approaches to the surface car parks, at times when ample spare capacity is available in nearby multi-storey car parks. This can lead to congestion.

Whilst preliminary findings of a recently undertaken Parking Study suggests car park users are more greatly influenced by convenience, rather than tariff, it is felt appropriate to adopt a pricing differential to encourage greater use of the larger-capacity, multi-storey car parks. A 20p differential in the hourly tariff between the surface and the multi-storey car parks may encourage changes in the behaviour for those users that might be more sensitive to price considerations.

Again, it is hoped these changes will assist with the town's Air Quality and Climate Change targets by reducing queuing on the approaches to the smaller-capacity surface car parks.

Therefore, Option 2 (section 12.2) is recommended to achieve these aims.

- (iv) In April 2019, the Monday to Saturday 'daytime' charge in York Road MSCP was increased by 30 pence per hour, from £1.00 per hour to £1.30 per hour. However, the decision was taken to increase season ticket and pre-payment cards at a lower rate over a number of years until equity was reached with other similar town centre car parks.

The 5% season ticket increase proposed for 2020-21 is in keeping with this plan to achieve equity over time.

- (v) There tends to be significant spare capacity within the town centre car parks in the evenings and overnight. Meanwhile, permit-holding residents within certain parts of Areas A, B and D have raised concerns about the availability of on-street space in the vicinity of their homes, at these times.

Whilst possible changes to the operational hours of the town centre CPZ, being considered by the Guildford Joint Committee as part of the current on-street parking review, may go some way towards addressing these issues, there is scope to offer local permit-holding residents greater flexibility to use the pay and display car parks overnight.

Although Area D permit holders can already do so for free, they have to pay the normal daytime charges if they remain within the car park after 8am.

The proposal modifies this dispensation, by extending it to permit-holding residents of Areas A and B. Although all permit holders will be expected to purchase and display a valid 'overnight' ticket, costing £1, it will allow them to park until 10am the next day (Monday to Saturday), rather than 8am, when the normal 'day-time' charges start. Therefore, they effectively get £3.60-£3.80 worth of parking for £1.

## **EX88 CAPITAL AND INVESTMENT STRATEGY 2020-21 TO 2024-2025**

The Executive considered a report on the Council's capital and investment strategy, which gave a high-level overview of how capital expenditure, capital financing and treasury management activity contributed to the provision of local public services along with an overview of how associated risk was managed and the implications for future financial sustainability.

The Executive noted that in order to achieve the ambitious targets within the Corporate Plan, the Council needed to invest in its assets, via capital expenditure.

The Council had a current underlying need to borrow for the general fund capital programme of £290 million. Officers had put forward bids, with a net cost to the Council of £47.8 million,



increasing the underlying need to borrow to £338 million should these proposals be approved for inclusion in the programme.

Some capital receipts or revenue streams could arise as a result of investment in particular schemes, but in most cases were currently uncertain and it was too early to make assumptions. Some information had been included in the capital vision highlighting the potential income. It was likely that there were cash-flow implications of the development schemes, where income would come in after the five-year time horizon and the expenditure would be incurred earlier in the programme.

All projects would be funded by general fund capital receipts, grants and contributions, reserves and, finally, borrowing. It was not currently known how each scheme would be funded and, in the case of development projects, what the delivery model would be. To ensure the Council demonstrated that its capital expenditure plans were affordable, sustainable and prudent, Prudential Indicators were set that must be monitored each year.

The capital programme included a number of significant regeneration schemes, which it was assumed would be financed from General Fund resources. However, subject to detailed design of the schemes, there might be scope to fund them from HRA resources rather than General Fund resources in due course. Detailed funding proposals for each scheme would be considered when the Outline Business Case for each scheme was presented to the Executive for approval.

Main areas of expenditure in the capital programme were:

- £5 million – vehicle replacement programme
- £18 million – museum development
- £32.5 million – town centre transport schemes
- £25.4 million – Ash road bridge
- £40.2 million – North Downs Housing
- £26.6 million – Guildford Park CP
- £9 million – Midleton redevelopment
- £59 million – Weyside Urban Village

The report included a summary of the new bids submitted, the position and profiling of the current capital programme (2019-20 to 2023-24) and the capital vision schemes.

The Corporate Management Team, the Lead Councillor for Finance and Assets, Customer Service, and the Joint Executive Advisory Board Budget Task Group, and the Joint EAB had all reviewed the bids presented in the report.

The report had also included the Council's Minimum Revenue Provision policy and the Prudential Indicators.

In relation to Treasury management, the Executive noted that officers carried out the treasury management function within the parameters set by the Council each year and in accordance with the approved treasury management practices.

The Council was in a good financial position, with a strong asset base and a good level of reserves.

The budget for investment income in 2020-21 was £1.684 million, based on an average investment portfolio of £79.8 million, at an average rate of 2.18%. The budget for debt interest paid was £5.656 million, of which £5.06 million related to the HRA.

Agenda item number: 12

In relation to non-financial investments and investment strategy, the Executive was informed that councils could invest to support public services by lending to or buying shares in other organisations (service investments) or to earn investment income (commercial investments where this was the main purpose).

The Council had £161.244 million of investment property on its balance sheet, generating a return of £9 million and a current yield of 6.3%.

The criteria for purchasing investment property, when originally approved were to achieve a minimum qualitative score and yield an internal rate of return (IRR) of at least 8%. It was now recommended that the IRR be changed to 5.5% due to the change in the market forces and recognition of the move to investing for strategic purposes, for example economic growth and housing and regeneration.

The Council had invested £12.251 million in its housing company – North Downs Housing (NDH), via 40% equity to Guildford Holdings Limited (£4.903 million) (who in turn passed the equity to NDH) and 60% loan direct to NDH (£7.348 million) at a rate of base plus 5% (currently 5.75%). The loan was a repayment loan in line with the NDH business plan.

The Executive, having noted the comments of both the Joint Executive Advisory Board and the Corporate Governance and Standards Committee in respect of the Capital and Investment Strategy, which were set out in full on the Supplementary Information Sheet circulated at the meeting,

RESOLVED: That, subject to Council approving the budget on 5 February 2020,

(1) the following new capital proposals referred to in Appendix 2 to the report submitted to the Executive:

- Sutherland Memorial Park ph 1 Calorifier replacement
- Sutherland Memorial Park main pavilion amenity club
- Sutherland Memorial Park cricket pavilion

be added to the General Fund Capital programme approved list and that the relevant officer be authorised to implement the schemes.

(2) the following new capital proposals referred to in Appendix 2 to the report:

- Investment property acquisition
- New house
- Energy & CO2 reduction in non-HRA properties
- Capital contingency fund

be added to the General Fund Capital programme provisional list and that these schemes, subject to the limits in the Financial Procedure Rules, be subject to a further report to the Executive, before being progressed.

(3) the following new capital proposals referred to in Appendix 2 to the report:

- LED lighting
- Car Parks Maintenance Reserve
- Air Source heat pump at Citizens Advice Bureau

be added to the General Fund Capital Programme approved list, to be funded by reserves, and that the relevant officer be authorised to implement the schemes.

- (4) the revenue implications of the new capital schemes referred to in paragraphs (1), (2) and (3) above be implemented in the relevant years stated in the bid.
- (5) the affordability limit for schemes to be funded by borrowing be set as per paragraph 4.32 in Appendix 1 to the report.
- (6) scheme ref ED38(p) relating to the North Street Development on the provisional capital programme be reduced to £2 million and any further scheme shall be subject to a new business case.

The Executive further

**RECOMMEND:**

- (1) That the General Fund capital estimates, as shown in Appendices 3 and 4 to the report submitted to the Executive (current approved and provisional schemes), as amended to include the bids approved by the Executive above, Appendix 5 (schemes funded from reserves) and Appendix 6 (s106 schemes), be approved.
- (2) That the Minimum Revenue Provision policy, referred to in section 5 of the report be approved.
- (3) That the capital and investment strategy be approved, specifically the Investment Strategy and Prudential Indicators contained within the report and in Appendix 1.

**Reasons:**

- To enable the Council to approve the Capital and Investment strategy for 2020-21 to 2024-25
- To enable the Council, at its budget meeting, to approve the funding required for the new capital investment proposals

**EX89 HOUSING REVENUE ACCOUNT BUDGET 2020-21**

The Executive considered a report setting out the 2020-21 draft budget for the Housing Revenue Account (HRA). The 2020-21 estimates had been predicated on the assumptions, ambitions and priorities contained in the HRA business plan.

It was proposed to increase Council house rents by 2.7% in line with the Rent Standard 2020 (issued by the Regulator of Social Housing) and the Policy Statement for Rents on Social Housing (Issued by The Ministry of Housing, Communities and Local Government).

A 2.7% increase in garage rents was also proposed from April 2020, based on the September 2019 Consumer Price Index (CPI) plus 1%.

The report had also set out progress with the new build programme, together with the proposed investment programme in tenants' homes.

Having considered the draft HRA budget for 2020-21 and noted that the Joint EAB had also considered the report and had supported the recommendations, the Executive

**RESOLVED:** That, subject to Council approving the budget on 5 February 2020,

- (1) The projects forming the HRA major repairs and improvement programme, as set out in Appendix 3 to the report submitted to the Executive, be approved.

Agenda item number: 12

- (2) The Director of Service Delivery be authorised, in consultation with the Lead Councillor for Housing/Access and Disability, to reallocate funding between approved schemes to make best use of the available resources.
- (3) The Director of Service Delivery be authorised, in consultation with the Lead Councillor for Housing/Access and Disability to set rents for new developments.

The Executive further

RECOMMEND:

- (1) That the HRA revenue budget, as set out in Appendix 1 to the report submitted to the Executive, be approved.
- (2) That the 2.7% rent increase in line with the Rent Standard 2020 and Policy Statement 2019 be approved.
- (3) That the fees and charges for HRA services, as set out in Appendix 2 to the report, be approved.
- (4) That a 2.7% increase in garage rents be approved.
- (5) That the Housing Investment Programme as shown in Appendix 4 (current approved and provisional schemes), be approved.

Reasons:

To enable the Council to set the rent charges for HRA property and associated fees and charges, along with authorising the necessary revenue and capital expenditure to implement a budget consistent with the objectives outlined in the HRA Business Plan.

## **EX90 BUSINESS PLANNING - GENERAL FUND OUTLINE BUDGET 2020-21**

The Executive considered a report which outlined the proposed budget for 2019-20, which included a Council Tax requirement of £10,192,858 and a Council Tax increase of £5 per year (3.00%), resulting in a Band D charge of £176.82. As set out in the report, the Council expected to achieve a balanced budget for 2020-21.

The Council received the provisional Local Government Finance Settlement (LGFS) for 2020-21 on 20 December 2019. The figures included in the outline budget presented to the Executive on 26 November 2019 reflected the information contained in the settlement.

The Settlement Funding Assessment (SFA) consisted of the local share of business rates, and revenue support grant and was set out in the provisional LGFS. The settlement was in line with the Council's expectation which enabled it to retain £2.929m of business rates in 2020-21 an increase of 1.6% on 2019-20.

In determining that the Council's Core Spending Power had increased by 0.4%, the Government had assumed that Council Tax would be increased by the maximum amount permissible, namely, £5 or 3% whichever was the higher.

The Joint Executive Advisory Board Budget Task Group and Joint EAB had considered the outline budget at their meetings on 8 November and 20 November 2019 respectively.

The Chief Finance Officer's statutory report, which was also appended to the main report, provided information about the strategic context within which the budget had been prepared,

the medium-term financial plan, the robustness of the estimates, adequacy of reserves and budget risks.

The financial monitoring report for the first eight months of 2019-20 would be reported to the Corporate Governance and Standards Committee on 15 January 2020. The Executive noted that projected net expenditure on the General Fund for the current financial year was estimated to be £96,766 less than the original estimate.

The Chief Finance Officer, in consultation with the Lead Councillor for Finance and Assets, Customer Service and the Leader of the Council would decide upon the appropriation of the final balance in June 2020. Any ongoing variances between actual expenditure and budget identified in 2019-20 had been taken into account when preparing the budget for 2020-21.

Having considered the draft budget, the Executive

**RESOLVED:**

- (1) That the transfer to reserves of the sums included in the proposed budget at Appendix 2 to the report submitted to the Executive, be approved.
- (2) That the growth bids, as set out in paragraph 10 of the report, be approved.

The Executive further

**RECOMMEND:**

- (1) That the proposed fees and charges for 2020-21 relating to General Fund services and attached at Appendix 3 to the report submitted to the Executive, be adopted with effect from 1 April 2020.
- (2) That the budget be approved, and specifically that the Council Tax requirement for 2020-21 be set at £10,192,858.
- (3) That the Band D Council Tax for 2020-21 be set at £176.82, an increase of £5 (3.00%).

Reason:

To enable the Council to set the Council Tax requirement and council tax for the 2020-21 financial year.

The meeting finished at 7.41 pm

Signed .....

Chairman

Date .....

## EXECUTIVE

18 February 2020

- \* Councillor Caroline Reeves (Chairman)
- \* Councillor Fiona White (Vice-Chairman)

- |                             |                             |
|-----------------------------|-----------------------------|
| * Councillor Joss Bigmore   | * Councillor Julia McShane  |
| * Councillor Angela Goodwin | * Councillor John Rigg      |
| * Councillor David Goodwin  | * Councillor Pauline Searle |
| Councillor Jan Harwood      | * Councillor James Steel    |

\*Present

Councillors Dennis Booth, Angela Gunning, George Potter, Maddy Redpath, Deborah Seabrook, Patrick Sheard, and Paul Spooner, were also in attendance.

### **EX91 APOLOGIES FOR ABSENCE**

Apologies were received from Councillor Jan Harwood.

### **EX92 LOCAL CODE OF CONDUCT - DISCLOSABLE PECUNIARY INTEREST**

There were no declarations of disclosable pecuniary interests.

Councillors McShane, Reeves, Searle and White declared non-pecuniary interests in regard to Item 6 on the agenda in that:

Councillor McShane was a member of the management committee for CHIPS and was the Council appointee to the board of Guildford Action acting as trustee.

Councillor Reeves was a trustee of Guildford Action

Councillor Searle was a trustee of Reskilled and a patron of Homestart

Councillor White was a member of the management committee for CHIPS and was the Council appointee to the board of Guildford Citizens Advice acting as trustee.

### **EX93 MINUTES**

The Executive approved, as a correct record, the minutes of the meetings held on 7 and 21 January 2020. The Chairman signed the minutes.

### **EX94 LEADER'S ANNOUNCEMENTS**

Following the implementation of Phase A of the Future Guildford Transformation Programme, which included the introduction of a new structure for the Corporate Management Team, the Leader intended to conduct a review of the Executive portfolios to ensure that there was a closer alignment with the new directorate responsibilities.

The Leader expressed concern about the safety of the brick-built bridge at Millmead Lock, following the recent flooding. This bridge was closed whilst a full structural investigation was being undertaken.

**EX95 WALNUT BRIDGE, GUILDFORD - CALL IN OF EXECUTIVE DECISION TAKEN ON 7 JANUARY 2020**

The Executive considered a report on the outcome of a review by Overview and Scrutiny Committee (OSC) of the decision taken by the Executive at its meeting on 7 January 2020 in relation to additional funding for the Walnut Bridge project following a call in.

A presentation video was provided to illustrate the existing bridge and the proposed replacement.

At its special call in meeting on 4 February 2020, the OSC had explored the Executive's understanding of the project; whether the Executive had sufficient and accurate information, taken into account all relevant facts and assessed them properly; and considered whether the Executive had acted in accordance with the Constitution's principles of decision making.

OSC had resolved as follows:

- (1) That the proposed decision taken by the Executive on 7 January 2020 in connection with the Walnut Bridge project be not supported and that it be referred back to the next appropriate meeting of the Executive for reconsideration.
- (2) That, in considering the referral back of the proposed decision, the Executive be requested to take into account the following comments and advice from the Overview and Scrutiny Committee:
  - (a) To re-examine the financial arrangements with the LEP in terms of a possible further extension of the delivery deadline.
  - (b) To investigate the possible removal of the ramp from the bridge design with the aim of a cheaper, less permanent option to the proposed ramp, in order to better accommodate any changes that may arise from the Town Centre Masterplan process.
  - (c) Subject to the outcome of the discussions with the LEP, to take the opportunity of looking at the bridge design "in the round".
  - (d) To review the proposed decision on the Walnut Bridge project with consideration to the Town Centre Master Plan.
  - (e) To consider whether it would make sense for the Town Centre Masterplan to be progressed prior to a decision being made in respect of proceeding with the Walnut Bridge project.

In accordance with Overview and Scrutiny Procedure Rule 16 (f), the Executive was required to reconsider the proposed decision by taking into account the comments/ advice submitted by the OSC referred to above. It was noted that once a decision had been referred back to the Executive following a call-in, it could not be subject to further call-in.

The Executive was informed that following the OSC meeting, a meeting with a representative of the LEP was held on 11 February 2020 to explore and consider what options there might be with respect to the Local Growth Fund expenditure dates and conditions for completion of the Walnut Bridge Project. Arising from that meeting, the following options were available for the Executive's consideration:

- 1 To review the design of the Bridge/Ramp to address concerns raised on the bulk of the ramp specifically and the design of the bridge itself.

Agenda item number: 12

- 2 To decline to proceed with Scheme
- 3 To decline to proceed with scheme and resolve to incorporate bridge/public realm vision within the DPD, or informal Masterplan
- 4 To confirm the Executive's decision taken on 7 January 2020

Details of the four options, together with the considerations, advantages and risks associated with those options were set out on the Supplementary Information Sheet circulated at the meeting.

Other issues arising from the meeting with the LEP included the following:

- Funding for the Walnut Bridge project was via the Local Growth Fund, which required that expenditure be made by 31 March 2021.
- The LEP was under significant pressure to secure that projects were delivered, and expenditure completed, to time.
- Uncertainty as to whether alternative or supplemental funding may be available from the Government, so there was an imperative to direct funding to projects which would deliver by the 2021 date. LEP would seek to recover funding by way of clawback if the Council were to choose not to deliver the scheme.
- LEP may offer flexibility on the detailed design – but the delivery deadline, and the continued meeting of the funding award criteria (the growth, transport indicators etc) were mandatory. If the Council sought to modify the design then it (design, contractor appointment) would need to be deliverable within the timeframe.

During the discussion on the options open to the Executive and the risks associated with those options, it was noted that any decision not to proceed along the LEP timescale would leave the Council in a less favourable financial position to complete the project. Amongst the Executive, there remained mixed views of the proposed design. Due to the financial position, commitment to the current design of the bridge was required at this point in time with acceptance that this commitment would be made before discussion of other public realm design projects that were in the pipeline.

Having taken into account the OSC's comments and advice and the options now open to the Council, the Executive

RESOLVED: That its decision taken on 7 January 2020 in respect of this matter be confirmed.

Reason:

To ensure compliance with Overview and Scrutiny Procedure Rule 16.

**EX96 ALLOCATION OF COMMUNITY AND VOLUNTARY GRANTS 2020-21**

The Lead Councillor for Community Health, Support and Wellbeing introduced the report asking the Executive to approve grants to community and voluntary organisations for 2020-21 as proposed by the Council's Grants Panel.

Having noted the advice of the Community EAB, the Executive

RESOLVED:



- (1) That the allocation of community grants for 2020-21, as set out in Appendix 1 to the report submitted to the Executive, be approved.
- (2) That the sum of £50,495 be transferred from the community grants budget to the budget for grants to voluntary organisations for 2020-21.
- (3) That the allocation of grant funding to voluntary organisations for 2020-21, as set out in Appendix 2 to the report, be approved.

Reason:

To enable the grants process for 2020-21 to be implemented.

**EX97 TOWN CENTRE CCTV EQUIPMENT UPGRADE**

The Executive, having considered a report on the need to update much of the Town Centre CCTV cameras and associated equipment to ensure the system continued to operate to the highest standards and to seek authority to undertake the necessary procurement

RESOLVED That the Town Centre CCTV Equipment Upgrade project be moved from the provisional to the approved list of the General Fund Capital Programme.

Reasons:

- To improve public safety and improve protection from and detection of crime.
- To approve to move the Town Centre CCTV Equipment Upgrade project from the provisional to the approved list of the General Fund Capital Programme.

**EX98 PAPERLESS MEETINGS**

The Executive noted that the Council faced a number of significant challenges particularly in respect of meeting its responsibilities following the declaration of a climate emergency in July 2019. In addition, as part of the Future Guildford transformation programme, it was proposed to achieve savings and efficiencies by reducing print and postage costs through the introduction of paperless meetings. To this end, councillors and officers had received ICT devices with the necessary functionality and software to enable them to read and annotate agendas electronically including the necessary training on how the devices and software operated.

The Lead Councillor for Finance and Assets, Customer Service introduced the report and was in support of a clean break option to paperless for all councillors from April of this year.

Some councillors present had reservations in regard to conducting their duties for certain committees such as Planning where agenda packs could be very large and complex. It was also suggested that councillors would print their agendas at home instead if they felt there was a need which would negate any reduction in CO<sub>2</sub> emissions achieved by the Council. It was further suggested that paper copies could be required under such circumstances where devices, internet connections, or the Modern.Gov app failed. Councillors were assured that suitable provision was in place.

Although transition would be more challenging for some councillors and officers than for others, the Executive considered it was right to proceed as long as there was additional training in place and that there would be a review of the decision after a certain time period.

RESOLVED:

- (1) That, subject to paragraph (3) below and with effect from 7 April 2020,

Agenda item number: 12

- (a) the Council will no longer provide to councillors, officers, Honorary Freemen, Honorary Aldermen, or the public, any printed copy agendas, minutes, order papers, supplementary information sheets (Late Sheets) for Council, Executive, Committee, Sub-Committee, Board, Working Group or Task Group meetings; and
  - (b) all officer level meetings shall be paperless.
- (2) That officers continue to support councillors in the understanding and operation of their new devices and the Modern.Gov app, including arranging a repeater session of the training given to councillors on 16 December.
  - (3) That the Council shall provide in respect of each meeting to which the public would be entitled to attend referred to in paragraph (1) (a) above:
    - (a) one hard copy agenda for viewing by the public at the main reception of the Council offices following publication of the agenda, and
    - (b) six hard copy agendas for viewing by the public at any such meeting.
  - (4) That the measures referred to above be introduced on a trial basis for six months and reviewed thereafter.

**Recommendation to Council (7 April 2020):**

That the following amendment be made to paragraph 1 (Scope) of the Access to Information Procedure Rules in Part 4 of the Constitution:

“Reference in these procedure rules to the making available or supply of copies of any agenda and reports, or any other written material submitted to the Council, Executive, Board, Committee or Sub-Committee shall include the provision of such copies by electronic means.”

Reasons:

To deliver on the Council’s commitments to secure ongoing savings in its revenue budget and to assist in achieving the Council’s corporate aspirations to reduce its carbon footprint, whilst still complying with legislation requiring the provision of copy agendas for inspection by the public.

In accordance with Council Procedure Rule 19 (e), Councillor Fiona White requested that her vote against the above decision be recorded.

**EX99 EXCLUSION OF THE PUBLIC**

The Executive

RESOLVED:

That under Section 100A(4) of the Local Government Act 1972 (as amended) and Regulation 5 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, the public be excluded from the meeting for consideration of the following item on the grounds that it involved the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act.

**EX100 NORTH STREET DEVELOPMENT GUILDFORD**

The Executive welcomed a report setting out a future development option for North Street. The Lead Councillor for Major Projects introduced the report and explained that the proposals put forward could revitalise this area of the town centre, provide greater diversity of use and

support modal shift. Having noted that those aspirations were compatible with the Council’s Corporate Plan and Local Plan, the Executive

RESOLVED:

- (1) That the Managing Director be authorised, in consultation with the Leader of the Council and the Lead Councillor for Finance and Assets, Customer Service to agree terms for the sale of the Council’s freehold interests in sites within the North Street Development area described in the report submitted to the Executive, subject to:
  - (a) the commercial agreement being conditional upon St Edward achieving planning consent for an acceptable scheme: a substantial residential-led mixed-use scheme with ground floor retail, leisure, and community uses;
  - (b) the Managing Director, Chief Finance Officer, Council Solicitor and Monitoring Officer, Leader of the Council, and the Lead Councillor being satisfied with the advice received from the property, cost, and legal advisers as to the financial viability of the proposed scheme and all other terms; and
  - (c) the Managing Director and Leader of the Council, being satisfied with:
    - (i) the advice of the Council Solicitor in respect of the proposed contractual arrangements; and
    - (ii) other due diligence undertaken in respect of the St Edward’s proposal.
- (2) That the sum of £500,000 be transferred from the provisional to the approved capital programme to enable a legal agreement to be reached with the developer for the sale of the Council’s interests in the site.

Reasons:

To support the Council’s policies set out in its Corporate Plan 2018-2023, The Local Plan 2015-2034 and Guildford Town Centre Regeneration Strategy 2017 to “facilitate the delivery of a major new mixed-use development on North Street incorporating a significant number of new homes and public realm improvements.

The meeting finished at 8.20 pm

Signed .....  
Chairman

Date

## STATEMENT OF DECISIONS TAKEN BY THE LEADER OF THE COUNCIL

Tuesday 24 March 2020

The matters referred to below were due to be considered by the Executive at its meeting on 24 March 2020. Due to the coronavirus crisis, the meeting was cancelled. Under Section 9E (2) (a) of the Local Government Act 2000, the Leader of the Council may take executive decisions.

The decisions summarised below were taken by the Leader of the Council on 24 March 2020 and, subject to the call-in procedure referred to in Overview and Scrutiny Procedure Rule 17 and to the Notes at the end of this document, shall have effect five working days after the date on which this statement was published. Details of any recommendations to Council are also included for completeness.

Other members of the Executive, councillors and members of the public were invited to submit any representations in writing that they would have made at the meeting, which the Leader took into account when making these decisions.

<b>Agenda Item No.</b>	<b>Officer(s) to action Item</b>
----------------------------	--------------------------------------

<b>1</b>	<b>APOLOGIES FOR ABSENCE</b>
----------	------------------------------

Not applicable.

<b>2</b>	<b>LOCAL CODE OF CONDUCT - DISCLOSABLE PECUNIARY INTEREST</b>
----------	---

There were no declarations of interest by the Leader.

<b>3</b>	<b>MINUTES</b>
----------	----------------

Not applicable.

<b>4</b>	<b>LEADER'S ANNOUNCEMENTS</b>
----------	-------------------------------

Not applicable.

<b>5</b>	<b>FUTURE MANAGEMENT AND OPERATION OF CHANTRY WOOD CAMPSITE</b>
----------	---

Decision:

(1) That the Chantry Wood Campsite continues in its current form with increased fees as set out in "Option B2" of the report submitted to the Executive.

Hendryk Jurk

(2) That the Council continues to engage with forest school operators to explore options to increase outdoor education whilst maintaining a camping facility.

Reason:

To implement arrangements at the campsite that respond to the views

expressed during the consultation that protects the natural environment and reduces the operational cost to the Council.

Options considered and rejected by the Leader of the Council:

Option B1 Basic facilities run by GBC  
Option B3 Basic Facilities – run by volunteers  
Option B4 Basic facilities – run by forest school

Details of any conflict of interest declared by the Leader and any dispensation granted:

None

Details of any written submissions received and considered by the Leader from other members of the Executive, councillors, public or officers:

Cllr Patrick Sheard (non-Exec member):

Given the latest strictures from HMG over the last few days, I don't feel it appropriate to take any decision at this current point in time.

Cllr Deborah Seabrook (non-Exec member):

EAB asked for the possibility of providing improved disabled facilities be investigated. Whilst the consultation had not revealed a great demand, that may be because respondents were self-selecting and it does not appear any attempt was made to ask disabled people if they were interested in using the site or what they would need to be able to do so. It may well be that any adaptations necessary would go far beyond 'reasonable adjustment' and hence be unachievable/ affordable. However, it would be good to see this point considered.

Leader's response:

We are deferring consideration of access improvements as the camp site can't be booked now and we will look at this when we are in a position to use it, when we know if the Forest School are interested and we will also review the booking system when the IT is in place.

Cllr George Potter (non-Exec member):

An issue that residents have raised with me is that the booking system for the campsite is likely to be a major contributory factor to its low usage.

At present all bookings must be made a year in advance and there is no online calendar to show the availability of the campsite. There is also no deposit required for making a booking. This effectively encourages people to make speculative bookings well in advance and then to simply cancel, or not show up, for bookings that they no longer want or need. The resultant booking vacancies aren't filled, however, because others who wish to book the site have no way of knowing that these vacancies exist.

Indeed, residents have told me that when calling to make booking enquiries staff have declined to tell them what dates are available and instead residents have resorted to asking about each calendar date in turn until they get to one to which the answer is "it's available".

If charges are going to increase then a priority must be to get a better booking system that encourages, rather than discourages, use of the

campsite.

Additionally, I would strongly support the prioritisation of rebuild/ adaptations to the toilet blocks to make them more disabled accessible. This should be prioritised ahead of works such as the refurbishment of the barn interior as, at present, the interior is predominantly used by the parks department for storage and is rarely used by public bookings.

Finally, residents have reported a belief that the campsite appears to periodically be used for internal corporate bookings by GBC. If this is indeed the case it should be the case that these bookings are cross-charged appropriately so that this usage is accurately recorded in figures which purport to show the usage of the campsite.

Leader's response:

- a) Corona Virus:  
The campsite is currently shut due to Corona Virus as we cannot provide basic sanitation and gatherings are discouraged as per government advice.
- b) The Booking system:  
A new online booking system is planned as part of the Future Guildford project. This could show a bookings calendar and include a deposit payment.
- c) Level of usage:  
The level of usage is determined by the single party booking, not the booking system. This is due to the current toilet system. The water infrastructure in the area would require upgrading in order to address this. This was considered in the Executive Report in 8 January 2019. The public consultation established that there is no public support for this scale of investment.
- d) Staff not being able to say what vacancies are available:  
In the winter we have maintained a waiting list as booking dates were not confirmed pending this decision on the future operation. In order to avoid any confusion, we neither offered nor confirmed that bookings on specific dates are available.
- e) More accessible toilets:  
Full disabled access cannot be achieved, as this would depend on water pressure availability. The water infrastructure in the area would require upgrading in order to address this. The public consultation established that there is no public support for this scale of investment. Some improvements can be delivered. The scope would determine the time required to address Green Belt/ Building regulations. Due to the nature of the surrounding site the current requirement for disabled access is low. A balance would need to be struck between effort and outcome, as the measures that are possible to be delivered within the current constraints may not be sufficient to provide greater accessibility.
- f) It is correct the campsite is occasionally booked for internal use. Cross charging would impact on the cost of other Council services, for example the Play Rangers.

**6 BURCHATTS FARM BARN CAR PARK, STOKE PARK**

Decision:

To defer the decision until a later date.

Sally Astles

Reason(s):

The parking assessment will be redone and so this was not an urgent piece of work to be undertaken at this point in time.

Options considered and rejected by the Leader of the Council:

To proceed with the project by transferring monies from the provisional to approved capital programme.

Details of any conflict of interest declared by the Leader and any dispensation granted:

None

Details of any written submissions received and considered by the Leader from other members of the Executive, councillors or public:

Cllr Patrick Sheard (non-Exec member):

Given the latest strictures from HMG over the last few days, I feel we should postpone this decision until the HMG has made its decision regarding infrastructure developments /building workers clearer.

Cllr Deborah Seabrook (non-Exec member):

Agreed in principle. However, I have 3 points:

1. Should we re-prioritise the capital programme in view of current unprecedented circumstances?
2. If/ when the works go ahead, priority should be given to maintaining spaces for use by Disability challengers during the works. Others can walk.
3. Only 3 cycle stands are mentioned in section 3.10. Given we are trying to increase sustainable travel, we should be making it easier for people to cycle, especially urban saints, Guildfordians etc.

Leader's response:

We will review the whole proposal because officers have informed us the parking assessment will have to be redone before we are able to start the work. Cycling can be reviewed then.

Cllr John Redpath (non-Exec member):

I am concerned about the charges for surfacing Burchatts car park. This is a huge amount of money for this area. Has it been properly tendered and is it for all the currently unsurfaced areas such as Challengers, the Barn demise etc?

Even then it's excessive.

Leader's response:

- It is an estimate to allow the formal tendering process to be undertaken. We cannot go through a tendering process without first getting authority to spend the money. Our engineers have allowed for a generous contingency of 15%, so there is a good chance the final cost will be less. We do not want to underestimate the final cost in case we do not have enough funds and

- end up having to go back to the Executive.
- Our engineers have based the cost on current contractor rates and these rates are from contractors on the cheaper end of the scale. The cost includes the following:
  - Preliminaries, restrictive working, traffic management
  - SUDS drainage works
  - Earthworks
  - Block paving construction
  - Tarmac construction
  - Kerbs, edgings
  - Consultants: CDM, QS and Engineering design time
  - Contingencies, 15% of works.

## 7 PROPERTY INVESTMENT STRATEGY

Decision:

To defer the decision to a future meeting of the Executive.

Melissa  
Bromham

Reason(s):

To reconsider when there can be a full discussion with members of the Executive and where the confidential Appendix 3 can be considered which it had been intended to circulate with a Late Sheet prior to the meeting being cancelled.

Options considered and rejected by the Leader of the Council:

1. To approve the Property Investment Strategy.
2. To approve the delegation of authority to the Head of Asset Management in consultation with the Director of Strategic Services, the Chief Financial Officer and the Lead Member for Finance, Asset Management and Customer Services, to acquire property within the set parameters of the strategy.

Details of any conflict of interest declared by the Leader and any dispensation granted:

None.

Details of any written submissions received and considered by the Leader from other members of the Executive, councillors or public:

Cllr Patrick Sheard (non-Exec member):

Given the latest strictures from HMG over the last few days, I don't feel it appropriate to take any decision at this current point in time.

Cllr Deborah Seabrook (non-Exec member):

Does this need reappraising in the light of the current circumstances? It is extremely difficult to discern what is going to be a good investment at this time but perhaps green energy projects provide more certainty. I attended the big energy summit and am in the course of writing a note on this topic.

Leader's response:

This isn't making it a priority to spend on property, current events will change all sorts of investment portfolios and all this does is allow for an action if deemed necessary.



**8 GUILDFORD BOROUGH LOCAL PLAN - LOCAL DEVELOPMENT SCHEME 2020**

Decision:

That the Local Development Scheme, as set out in Appendix 1 to the report submitted to the Executive be adopted with effect from 1 April 2020.

Stuart  
Harrison,

Reason:

To progress the new Guildford borough Local Plan: development management policies by having a Local Development Scheme (LDS) with an up to date timetable for the Local Plan.

Options considered and rejected by the Leader of the Council:

None.

Details of any conflict of interest declared by the Leader and any dispensation granted:

None.

Details of any written submissions received and considered by the Leader from other members of the Executive, councillors or public:

Cllr Patrick Sheard (non-Exec member):

This is probably inappropriate at this time.

Leader response:

This is not a radical decision that might be impacted by the Covid-19 situation and is required in order to move forward with the proposed consultation on the Development Management Policies approval of which will be required from Full Council.

Cllr Deborah Seabrook (non-Exec member):

Agrees with recommendation

**9 REGULATION 18 CONSULTATION ON LOCAL PLAN: DEVELOPMENT MANAGEMENT POLICIES**

Recommendation to Council:

- (1) That the draft Local Plan: Development Management Policies document, as set out in Appendix 2 to the report submitted to the Executive, be put before Full Council on 7 April 2020 for approval for Regulation 18 public consultation and to approve a seven-week period of consultation beginning on 20 April 2020.
- (2) That the Planning Policy Manager be authorised to make such minor alterations to improve the clarity of the document as he may determine in consultation with the Lead Councillor.

Stuart  
Harrison,

Reason(s):

Undertaking a public consultation on the draft Local Plan is a statutory requirement placed on Local Planning Authorities under Regulation 18 of

the Town and Country Planning (Local Planning) (England) Regulations 2012 and will enable the Council to move closer to adopting the second part of the Local Plan.

Options considered and rejected by the Leader of the Council:

None.

Details of any conflict of interest declared by the Leader and any dispensation granted:

None.

Details of any written submissions received and considered by the Leader from other members of the Executive, councillors or public:

Cllr Patrick Sheard (non-Exec member):

I can see little point recommendation to the Full Council Meeting that seems highly unlikely to occur.

Leader's response:

We can move this item through to Full Council whilst we await guidance from Government on how we will be able to progress business during this challenging time.

Cllr Deborah Seabrook (non-Exec member):

Overall, I am supportive of this document and appreciate the work that has gone into it. However, I and other councillors participated in the EAB which considered this document on 17<sup>th</sup> Feb. We have also made written submissions. Whilst the document summarises EAB comments, short of going through the document for that meeting and the current document, it is difficult to ascertain what changes have been made as a result of any councillor written representations etc. It does not feel like the officers really pay much attention.

Leader's response:

I will ask the Planning Policy Manager to comment on and perhaps highlight specifically in the report to Council any changes made to the document as a result of councillors' written representations.

## **10 TOWN CENTRE MASTERPLAN**

Decision:

- (1) That a Town Centre Masterplan Programme Board be established and chaired by Councillor John Rigg.
- (2) That a procurement specialist be appointed for the purpose of a delivery led town centre project who will advise the Council on the recruitment of a team of specialists, including planners, to lead on the delivery of a portfolio of projects that will together contribute to the comprehensive regeneration of Guildford town centre, and be responsible for delivering the projects that are identified as supporting the future of the Town Centre as well as the evidence base that will inform an aspirational document to explore the development potential of the Town Centre.

Andrew  
Tyldesley

Reason:

To support the implementation of the resolution in Council minute C029.

Options considered and rejected by the Leader of the Council:

To not approve the recommendation thereby delaying the delivery of a strategy for the improvement of Guildford Town Centre.

Details of any conflict of interest declared by the Leader and any dispensation granted:

None.

Details of any written submissions received and considered by the Leader from other members of the Executive, councillors or public:

Cllr Patrick Sheard (non-Exec member):

I am happy to support this proposal.

Cllr Deborah Seabrook (non-Exec member):

Agree with the recommendation.

**11 PAPERLESS MEETINGS**

Decision:

That Option B, as set out below, be implemented:

John  
Armstrong

To adopt a “paper-light” approach to meetings, which would have paperless meetings as an aspiration, but recognise that councillors should still have a choice between using their devices and the functionality of the Modern.Gov app or continuing to receive paper copy agendas; and in respect of the latter, the basis upon which paper copies will be provided will be as follows:

- Paper copy Council agendas and order papers will only be provided to councillors who ‘opt in’ to receive them and, similarly, paper copy committee agendas and supplementary information (late) sheets will only be provided to members of a committee and substitutes who ‘opt in’ to receive them
- Paper copy agendas will be placed in councillors’ pigeon-holes unless they ‘opt in’ to have them sent by first class post
- The ‘opt in’ requirements to also apply in respect of agendas for working groups, task groups, and task and finish groups involving councillors

Reason(s):

To work towards delivering on the Council’s commitments to secure ongoing savings in its revenue budget and to assist in achieving the Council’s corporate aspirations to reduce its carbon footprint, whilst still complying with legislation requiring the provision of copy agendas for inspection by the public.

Options considered and rejected by the Leader of the Council:

Option A – confirm original decision taken by Executive on 18 February 2020.

Details of any conflict of interest declared by the Leader and any dispensation granted:

None.

Details of any written submissions received and considered by the Leader from other members of the Executive, councillors or public:

Cllr Patrick Sheard (non-Exec member):

I'm happy with this proposal, though I see little point in having paper agendas in pigeon-holes / via post unless there is a further choice to not having them at all (Or some procedural / legal requirement for these to be distributed)

Leader's response:

Option B emphasises that there is an initial presumption of paperless meetings, subject to the "opt in" provisions outlined above. Councillors not wishing to have agendas should not therefore opt in.

Cllr Deborah Seabrook (non-Exec member):

Agrees with the recommendation.