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Contact Officer:

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16 March 2020

Dear Councillor

Your attendance is requested at a meeting of the **EXECUTIVE** to be held in the Council Chamber, Millmead House, Millmead, Guildford, Surrey GU2 4BB on **TUESDAY, 24 MARCH 2020** at 7.00 pm.

Yours faithfully

James Whiteman
Managing Director

MEMBERS OF THE EXECUTIVE

Chairman:

Councillor Caroline Reeves (Leader of the Council and Lead Councillor for the Environment & Sustainability across the borough, Transformation, Sustainable Transport, Economic Development, and Governance))

Vice-Chairman:

Councillor Fiona White ((Deputy Leader of the Council and Lead Councillor for Personal Health, Safety and Wellbeing))

Councillor Joss Bigmore, (Lead Councillor for Finance and Assets, Customer Service)
Councillor Angela Goodwin, (Lead Councillor for Housing, Access & Disability, Homelessness)
Councillor David Goodwin, (Lead Councillor for Waste, Licensing, and Parking)
Councillor Jan Harwood, (Lead Councillor for Planning, Regeneration and housing delivery)
Councillor Julia McShane, (Lead Councillor for Community Health, Support and Wellbeing)
Councillor John Rigg, (Lead Councillor for Major Projects)
Councillor Pauline Searle, (Lead Councillor for Countryside, Rural Life, and the Arts)
Councillor James Steel, (Lead Councillor for Tourism, Leisure, and Sport)

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 3



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:

- | | |
|---------------------|--|
| Place-making | 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 |
| Community | Supporting older, more vulnerable and less advantaged people in our community |
| | Protecting our environment |
| | Enhancing sporting, cultural, community, and recreational facilities |
| Innovation | 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.

AGENDA

ITEM NO.

1 APOLOGIES FOR ABSENCE

2 LOCAL CODE OF CONDUCT - DISCLOSABLE PECUNIARY INTEREST

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 - 10)

To confirm the minutes of the meeting of the Executive held on 18 February 2020.

4 LEADER'S ANNOUNCEMENTS

**5 FUTURE MANAGEMENT AND OPERATION OF CHANTRY WOOD CAMPSITE
(Pages 11 - 92)**

6 BURCHATTS FARM BARN CAR PARK, STOKE PARK (Pages 93 - 104)

7 PROPERTY INVESTMENT STRATEGY (Pages 105 - 128)

**8 GUILDFORD BOROUGH LOCAL PLAN - LOCAL DEVELOPMENT SCHEME 2020
(Pages 129 - 138)**

**9 REGULATION 18 CONSULTATION ON LOCAL PLAN: DEVELOPMENT
MANAGEMENT POLICIES (Pages 139 - 368)**

10 TOWN CENTRE MASTERPLAN (Pages 369 - 380)

11 PAPERLESS MEETINGS (Pages 381 - 388)

Key Decisions:

Any item on this agenda that is marked with an asterisk is a key decision. The Council's Constitution defines a key decision as an executive decision which is likely to result in expenditure or savings of at least £200,000 or which is likely to have a significant impact on two or more wards within the Borough.

Under Regulation 9 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, whenever the Executive intends to take a key decision, a document setting out prescribed information about the key decision including:

- the date on which it is to be made,
- details of the decision makers,
- a list of the documents to be submitted to the Executive in relation to the matter,
- how copies of such documents may be obtained

must be available for inspection by the public at the Council offices and on the Council's website at least 28 clear days before the key decision is to be made. The relevant notice in respect of the key decisions to be taken at this meeting was published as part of the Forward Plan on 25 February 2020.

EXECUTIVE

18 February 2020

- * Councillor Caroline Reeves (Chairman)
- * Councillor Fiona White (Vice-Chairman)

- * Councillor Joss Bigmore
- * Councillor Angela Goodwin
- * Councillor David Goodwin
- Councillor Jan Harwood

- * Councillor Julia McShane
- * Councillor John Rigg
- * Councillor Pauline Searle
- * Councillor James Steel

*Present

Councillors Dennis Booth, Angela Gunning, 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.

- 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:

Agenda item number: 3

- (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 CO₂ 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,

- (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

Executive Report

Ward(s) affected: Holy Trinity

Report of Director of Service Delivery

Author: Hendryk Jurk, Countryside Manager

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Lead Councillor responsible: Pauline Searle

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Date: 24 March 2020

Future Management and operation of Chantry Wood Campsite

Executive Summary

In March 2019, the Executive considered the options available to the Council in relation to the Chantry wood campsite. It decided that public consultation should be undertaken and the results reported back to the Executive to inform its decision on the future of the campsite.

Consultation exercises were undertaken during 2019 via a range of methods.

The key messages resulting from the consultation are that there is strong public support for the continuation of public camping at Chantry Wood, there is an appeal of the basic facilities and that people would be willing to pay a higher fee.

Respondents were also supportive of the idea of using this area for a forest school but were concerned about the loss of private camping.

Finally, some residents indicated that the Council should consider enabling volunteers to run the site and this, together with other information gathered, has been added to the original options appraisal.

Recommendation to Executive

- (1) That the Chantry Wood Campsite continues in its current form with increased fees as set out in "Option B2" of this report (paragraph 5.7).
- (2) That the Council continues to engage with forest school operators to explore options to increase outdoor education whilst maintaining a camping facility.

Reason(s) for Recommendation:

To implement arrangements at the campsite that respond to the views expressed during the consultation and protects the natural environment and reduces the operational cost to the Council.

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

1. Purpose of Report

- 1.1. This report set out the responses from: the public consultation carried out in November 2019, site users feedback collected during the summer season 2019 and the local consultation undertaken in February 2019, to enable the Executive to reach a decision on the future of the camp site.

2. Strategic Priorities

- 2.1. A number of Council policies and strategies cover the management of the Borough's countryside estate. These include the adopted Countryside Vision, the Play Strategy, the Surrey Hills AONB Management Plan and the provision of SANGs in the Local Plan.
- 2.2. These policies and strategies seek
- to protect and enhance the natural environment for future generations
 - to encourage access, education and enjoyment of the natural environment
 - to reduce negative impacts from activities on residents, landscape, biodiversity and other recreational activities

3. Background

- 3.1. The Chantry Wood Campsite was originally subject to review because the current buildings required investment and there were operational costs and difficulties for the Parks Service to effectively manage the site.
- 3.2. The original report was considered by the Executive at its meeting on 8 January 2019 and this considered the following options:

Option	Capital Cost	Operational Cost	Constraints
A: Fully refurbish campsite with upgraded facilities	£313,000	(£2,500)	Traffic, Habitat, Impact on Neighbours, planning permission, Building Regulations
B: Continue current operation with small facility improvements	£58,500	£2,000	Due to the constraints on building regulations, this option was not consulted on.
C: Continue current operation without changes to the facilities	£36,000	£5,000	
D: Carry out small scale refurbishment to lease area for forest school use	£36,000	(£7-9,000)	No camping facilities
E: Lease area for forest school use without facility improvement	£17,000	(£4,000)	No camping facilities
F: Return site to grassland/ woodland	£8,000	0	
G: Consult on options	tbc	tbc	

- 3.3. The Executive met again on 7 March 2019 following public representations and decided:

- “(1) That subject to paragraph (2) below and a further report to and decision of the Executive, the proposal to lease Chantry Wood campsite (Barn and firepits) to a forest school operator, as approved provisionally by the Executive on 8 January 2019, be amended to a proposal to grant a non-exclusive licence(s) in respect of the Chantry Wood Campsite for use as a forest school, with the continued shared use for camping and use by community groups and families at weekends and in holiday periods.
- (2) That the proposal referred to in paragraph (1) above be delayed for 12 months, during which time the Council shall:
- (a) undertake further discussions with the local community to seek to ascertain a preferred option for the future management of the campsite, including other options in terms of the educational aspects relating to woodland and countryside awareness;
 - (b) undertake as soon as practicable the minimum level of works to the building to make it weatherproof and secure in 2019 for continued use as a campsite;
 - (c) confirm provisional bookings for the campsite for 2019;
 - (d) undertake further monitoring of usage of the campsite;
 - (e) engage with potential operators to establish the future viability of a forest school operating a campsite at Chantry Wood Campsite, and that this be reviewed by the Executive once responses are received; and
 - (f) postpone the proposed small-scale refurbishment and upgrade works pending the review of responses received from potential forest school operators.

Reason: To respond to concerns raised by local residents during and following the recent consultation.”

- 3.4. Since 7 March 2019:
- (i) Further discussions with the local community and consultation exercises have been undertaken.
 - (ii) Works have been undertaken to allow the camp site to continue to operate.
 - (iii) Bookings were honoured.
- 3.5. During 2019 there were 992 bookings covering 91 nights.
- 3.6. Detailed discussions with Forest School operators have not yet taken place, as the potential constraints resulting from the public consultation will need to be included in those discussions.

4. Stakeholder engagement/ Consultations

- 4.1. A local consultation was carried out following the Executive meeting on 8 January 2019. Residents and interest groups were contacted. These included local residents, the Tyting Society, Holy Trinity Amenity Group and customers who made provisional bookings.
- 4.2. The detailed actions and responses received in the local consultation were outlined in the Executive report 7 March 2019, Appendix 2.
- 4.3. The local consultation received 12 responses with a further 5 responses received as a result of a blog published by a member of the public. In addition, some other correspondence has been received.

- 4.4. Over the summer 2019, the Council collected onsite feedback from campers using a comment form. The form provided space to make comments on the campsite and its facilities without asking specific questions.
- 4.5. Twelve feedback forms were returned that all commented positively on the location but not the facilities, apart from two comments on the access track.
- 4.6. Following the summer camping season, the Council engaged an external consultancy company (SMSR) to carry out a wider consultation exercise. This took place in November 2019.
- 4.7. The following stakeholders were included
 - Non-users
 - Users (including previous campers / family groups)
 - Scout/ community groups
 - Schools that previously booked the campsite
 - Forest school providers
- 4.8. The consultation included the following activities:
 - I. Online consultation open from 24 October 2019 until 30 November 2019. A total of 459 residents completed the survey. The consultation was advertised via a press release and posters displayed at Chantry Wood. Of the online users, all were deemed to be Guildford residents. Of those 48% had never used the facility, 19% had used it once, 22% had used it 2-5 times and 11% more than 5 times.
 - II. Two focus groups held at the Council offices on 12 and 13 November. 25 residents attended the groups consisting of a mix of users and non-users – mainly recruited from the Citizens’ Panel and previous users (family groups/ Scouts) and forest school providers.
 - III. Face to face interviews with 3 individual residents and 2 forest schools.

5. Stakeholder responses received

- 5.1. The detailed stakeholder responses are outlined in the report SMSR (Appendix 1).
- 5.2. The key issues raised by stakeholders are summarised below.
 - I. No support for large scale development
 - II. Desire to retain camping for the public
 - III. Concerns regarding traffic on local roads
 - IV. Concerns regarding the bluebell woodland that surrounds the campsite
 - V. Concerns that access to Chantry Wood would be restricted or parts of Chantry Woods were sold off which were the result of misinformation
 - VI. Request for more Stakeholder engagement and provision of more detail on the various options
- 5.3. The consultation results regarding the future operation of the camp site are summarised below:

Option	Preferred option	Second choice	Total % for first and second choice
A: Fully refurbish campsite with upgraded facilities	15%	29%	44%

B: Public campsite with the basic existing facilities	60%	19%	79%
C: Campsite for schools and scouts only	9%	32%	41%
D: Forest School	18%	12%	30%
E: No campsite.	9%	6%	15%

5.4 The table below summarises the results of the qualitative consultation on the options:

Option A: Fully refurbished campsite	Little support to justify a large investment to the site and there are concerns about the impact on the Area of Outstanding Natural Beauty.	Improvements to the water supply and provision of electricity on site are only deliverable in this scenario.
Option B: Continued public camping with basic facilities.	Strong desire for public camping, including a willingness to accept higher camping fees. The existing facilities were rated poor by 22% of respondents.	Further details are explored below
Option C: Campsite for school and scouts only	No strong support this option, which can be attributed to the desire to retain public camping.	The lack of responses received from community groups indicates that there is little demand from this customer base
Option D: Forest School	There is support for the Forest School in principle, but this was overshadowed by the desire to retain public camping.	Further details are explored below
Option E: No campsite	Although the possibility to return the area to natural habitat found some support, it has been the least popular option.	

5.5 No responses were received from the five schools that were contacted.

5.6 In relation to the preferred option of continuing public camping, the following should be noted:

- (i) It is not practical to install toilets with direct connections to the cesspit without a better water supply that would comply with Building Regulations.
- (ii) The campsite will need investment in order to extend the life of the current facilities. The levels of investment are detailed in section 9.
- (iii) Consultees recognised the financial challenges of the running of the campsite and there were suggestions made to explore the running of the campsite bookings by a third party.

- (iv) Within the qualitative analysis some residents indicated that the Council should consider enabling volunteers to run the site. This has been included in the options appraisal. No firm proposals have been received at this stage however.

5.7 Continuing with the stated preferred option, the qualitative assessment suggests that the following would be acceptable to the public.

Option	Consultation responses	Estimates	What does it mean to the customer
B1 Basic facilities run by GBC	Current charges at £4.75 Considered value for money	Net cost to the Council in 2018-19: £3,306 Net cost to the Council so far in 2019-20: £7,609 which includes reactive repairs of £6,943	Customers pay the same amount for the camping facilities, subject to agreed inflation increases.
B2 Basic facilities run by GBC with increased charges	Consultation identified that there is support (73%) to increase camping fees of up to £10 per person. (A previous increase in fees led to a drop in customer numbers however)	For example £9.50/ person. Could achieve surplus in the region of £3,000	This would mean campers would need to pay more money to camp with the same facilities. A detailed pricing structure is outlined in 8.3. Subject to inflation increases.
B3 Basic Facilities – run by volunteers	This has been proposed by a number of respondents	Assuming this could generate an income that could be re-invested in the facilities.	As B1. plus Volunteers would need to <ul style="list-style-type: none"> • Take bookings and answer queries • Visually inspect buildings, bollards, taps, fire pits, benches, chemical toilets • Prepare toilets (sweep out, place chemical toilets into toilet blocks) • Inspect campsite for dog fouling prior to bookings • Meet to unlock the site and provide introduction to campers (be available for changes in arrival times) • Be on call to respond to issues, in particular unauthorised groups turning up on site • Remove litter daily for large groups • Remove litter, and empty chemical toilets if required and clean toilets and barn after departure • Monitor and replenish usable items (toilet roll, toilet fluid,

			disposable gloves) <ul style="list-style-type: none"> • Check fire is out following bookings • Secure site
B4 Basic facilities – run by forest school	This has been considered as an option but has not found support from forest school operators without considering the full extent of business limitations.	As it stands this scenario is currently unlikely to be deliverable in the short term as this is outside the forest schools business model	

5.7.1 The financial estimates based on realistic assumptions of visitor that may not occur as estimated. The estimated numbers aim to reflect an average group size over the year. Visitor numbers may change year on year. Estimates assume no significant increase in use during the winter months.

5.7.2 The camping fees illustrated include a VAT charge that is not applied to the net income.

5.7.3 The cost of administration (for the booking is not known and not factored into the assumptions.

5.7.4 The Council has previously supplied fire wood in order to discourage campers from collecting wood from the surrounding areas. Due to a change in forestry operations, firewood cannot be provided in future.

5.8 Options for Community Group Camping

5.8.1 There was no strong support for this option as standalone camping provision.

5.8.2 Responses received from 11 groups appear to reflect that there is little demand from this customer group.

5.8.3 This option would continue provide camping opportunities for community groups who are largely self-sufficient.

5.8.4 Some feedback received raised safeguarding issues as a reason why the site is less used by scouts, guides and schools, because the campsite is fully accessible to the public at all times.

5.9 Options for Forest Schools

5.9.1 The qualitative assessment identified that there is support for a Forest School in principle, but this has been overshadowed by the desire to retain public camping.

5.9.2 Further detailed discussions with Forest School operators have not yet taken place, as the potential constraints resulting from the public consultation will need to be included in any discussions. Feedback received indicates that it is unlikely that Forest School Operators would consider it viable to operate public camping provision.

5.9.3 As it stands, Forest School operators are not confident that they could include a public campsite operation into their business model.

- 5.9.4 The public reaction towards the forest school proposal have made some operators reconsider the suitability of the campsite as a long term operation.

6 Executive Advisory Board Comment

6.1 The Community EAB on 13 February 2020 was invited to express views in respect of the recommendations to the Executive to agree Option B2 that the campsite continued in its current form with increased fees as shown in shown in paragraph 5.7 of the report and that the Council continued to engage with forest school operators to explore options to increase outdoor education whilst maintaining a camping facility. The reasons for the recommendations were to implement arrangements at the campsite that responded to the views expressed during the consultation whilst protecting the natural environment and reducing the operational cost to the Council.

6.2 The following points and comments arose from related questions and discussion:

- The continued use of the site as a private campsite enhanced by the addition of a forest school was welcomed.
- Funding predictions set out in the report were scenarios based on assumptions regarding the numbers of child and adult users and that all users paid the same rate.
- Whilst the minimum price per booking for use of the whole site had increased and a further charge was made per additional adult per night, many consultees had indicated that they were content to pay a higher charge and were in favour of the single use option.
- Although a capital investment of £22,000 to rebuild both toilet blocks to increase their accessibility to disabled people and make them more pleasant received some support from councillors, consultation responses had not indicated strong support for this improvement which would lead to price increases.

6.3 The Chairman summarised the EAB's views that the Executive should explore the possibility of making some limited disabled adaptations to improve the campsite's facilities, that Option B2, to continue to provide basic facilities operated by the Council with increased charges, be supported, and that the Council should continue to engage with forest school operators to explore options to increase outdoor education whilst maintaining a camping facility.

7 Equality and Diversity Implications

7.5 Please refer to the EQiA from the previous report in Appendix 2.

8 Financial Implications

8.5 The net cost for the operation of the campsite in 2018-19 was £3,306 and in 2019-20 (to date) £7,609 which includes reactive repairs of £6,943.

8.6 A review of the pricing structure that doubles the general fee per person could potentially achieve break even or achieve a small surplus depending on uptake by customers.

8.7 Proposed Prices:

Proposed Price	Previous price
Adults £9.50/ person/ night	£4.75/ person/ night
Children under 4 years old: no charge	Children under 3 years old no charge
Children under 16: £4.75/ person / night	£4.75/ person / night
Scouts / Guides and affiliated groups: £4.75 / person/ night	£4.75/ person / night
School groups: £4.75 / person/ night	£4.75/ person / night
Minimum charge: £30 per booking. (previously £15)	£15 per booking

8.8 Potential scenarios in 2020-21 based on average expenditure are as follows:

summary				
resistance	5%	10%	15%	20%
expenditure	6,149	6,056	5,963	5,901
income	(9,460)	(9,217)	(8,975)	(8,732)
net income	(3,311)	(3,161)	(3,012)	(2,831)

8.9 A review of the pricing structure appears to be supported by 73% of sites users. It is not possible to predict customers' acceptance of a new pricing structure and no exact estimates have been made yet to predict a revised income.

8.10 These figures are theoretical estimates, and may change, for example if discounts for children or community groups are applied.

8.11 It is assumed that any surplus generated would be re-invested in the campsite infrastructure.

8.12 Please note that work has been carried out to the buildings since compiling the report in Appendix 2. A further detailed assessment of costs would need to be carried out to identify the exact refurbishment costs.

8.13 Possible capital investment scenarios are:

Works	Cost
Minimal work to buildings are safe for immediate use.	This was done in 2019 at a cost of £6,900
Work to address foreseeable issues in order to extend the life of the existing facilities	Replace roof of toilet blocks and decorate by 2021: £5,500 Replace doors to both toilet blocks with self-finished steel by 2021: £3,500 Re-paint exterior of barn and an allowance for sundry repairs by 2024: £3,500
Works to implement small improvements for example	Re-paint exterior of barn and an allowance for sundry repairs - £3,000 Refurbish barn including timber repairs, partitioning, insulation, lining, solar lighting, roof covering, etc. - £40,000 Re-build both toilet blocks to make them both

	<p>accessible to the disabled and more pleasant - £22,000 (Includes extending water supply to suitable locations)</p> <p>Move the toilet facilities into one end of the barn and construct dedicated storage on the footprint of the existing - £16,500</p> <p>Construct a dedicated chemical toilet emptying point, as typically found on caravan sites, to make this activity less arduous - £4,000</p> <p>Add some paved areas in and around the facilities to make them more useable and easier to keep clean - £3-5,000</p>
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9 Legal Implications

- 9.1 Title of the campsite land and surrounding area was purchased by the Council on 4 February 1938. The conveyance contains restrictive covenants which will require further investigation and legal advice prior to any disposition of the land.
- 9.2 In addition, the campsite land and surrounding area is designated to be green belt land pursuant to a Deed dated 7 April 1942. The Deed limits the use of the land and details consents which are required for any disposal of this land.
- 9.3 Planning permission will be required to change the use of the land. Building on the land is limited by its designation as an Area of Outstanding Natural Beauty.

10 Human Resource Implications

- 10.1 There are no Human Resource implications arising from this report.

11 Conclusion

- 11.1 As reported previously, there are challenges and costs associated with continuing with the operation of the campsite in its current or a refurbished format.
- 11.2 The consultation that took place in November/ December 2019 comprised of an online survey eliciting 459 responses, two focus groups utilising 25 members of the citizens' panel and 5 in depth stakeholder interviews.
- 11.3 The preferred options for the use of the campsite in rank order were:
- 1) Option B – a campsite for the public with basic facilities 79%
 - 2) Option A – a refurbished campsite for the public 44%
 - 3) Option C – a campsite for schools and scouts only 41%
 - 4) Option D – A campsite for forest school education 30%
 - 5) Option E – No campsite 15%
- 11.4 There is strong public support for the continuation for public camping at Chantry Wood, and the appeal of the basic facilities was highlighted.
- 11.5 Previous users (165 out of 225) indicated that they would be willing to pay a higher fee.
- 11.6 210 respondents consider that it currently offers value for money and indicated high satisfaction levels with the current provision.

- 11.7 Respondents were in principle supportive of the proposal to use this area for a forest school but were concerned about the loss of private camping. There continues to be a limited understanding of what a forest school is by the public.
- 11.8 Respondents to the consultation also raised concerns about potential impact on the Chantry Wood bluebell habitat and traffic on the local roads that would limit commercial potential of the site.
- 11.9 Further detailed discussions with Forest School operators have not yet taken place, as the potential constraints resulting from the public consultation will need to be included in the discussions. Feedback received indicates that it is unlikely that Forest School Operators would consider it viable to operate public camping provision.
- 11.10 In any future scenario the Council may require the introduction of rules or restrictions to the use of the site for example to comply with safety regulations or to limit impact on the environment and other site users.
- 11.11 Given all the feedback and further analysis it is recommended that public camping continues to be provided at Chantry Wood camp site with increased fees being introduced.

12 Background Papers

Executive reports considered on 8 January 2019 and 7 March 2019.

13 Appendices

Appendix 1: Chantry Wood Campsite Consultation

Appendix 2: Chantry Wood Campsite Consultation (More information)

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Interim report:

Chantry Wood Campsite Consultation

January 2020
V1.3



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1.0 Executive Summary

Executive Summary

The following summary intends to provide Guildford Borough Council with the key findings from the Chantry Wood Campsite Consultation undertaken by SMSR Ltd; between 24 October 2019 to Monday 30 November 2019. The mixed method research engaged stakeholders through both quantitative and qualitative processes including an online survey (459 respondents) and two focus groups with supplementary in-depth interviews. The research sought a balance of both individual and organisations to respond to the research questions and a blend of ‘users’ and ‘non-users’ of the Chantry Wood Campsite. All contributors to the robust data are Guildford residents and Guildford organisations.

While the consultation could be considered sensitive, measured in part by the public response, media exposure and number of Information Requests submitted, it is possible to distil down the data collected to identify with more accuracy, public opinion and opportunities for pragmatic next steps for the borough council.

The quantitative, online consultation elicited 459 responses from Guildford residents and presented an overwhelming level of support for Option B - A campsite for the public: basic facilities. With this option the Council would continue to provide a campsite with the existing basic facilities (chemical toilets and cold water supply). Repairs would cost about £36,000. The Council would continue to subsidise the campsite, costing about £5,000 a year. In total 60% of participants within the online consultation stated Option B as their preferred solution for the Chantry Wood campsite (71% of users stated this as their preferred option compared to 50% non-users) while overall 20% stated the Option B as their second preference.

While support for Option B is dominant the caveat must be that it presented the only viable option for the site which retained the capacity for public camping. While Option A incorporated public access it was vehemently rejected through the qualitative engagement due to both cost and the potential detrimental impact on the area as one Outstanding Natural Beauty through increased visitor numbers and considered less favourable in the quantitative process for the same reasons.

The qualitative engagement process revealed stakeholder concern for the potential loss of the facility for public camping; while there was no resistance to use of the facilities from scout groups, schools and forest schools, in fact, these cohorts were encouraged to occupy the camping space, as was opportunities for these groups to coexist with public campers.

Understanding was demonstrated by respondents that a council facility operating at a financial loss was both of concern and not considered sustainable while there was an appetite to work collaboratively to identify a solution which may satiate stakeholders and the borough councils’ requirements, this needs further exploration as the chances of working this way were not explicitly tested during the groups.

The qualitative process included flexibility to explore opportunities to reengineer the site which would reposition the asset and mitigate the current financial deficit it operates under. These discussions incorporated an almost amalgamation of options A-D tested within the online survey; it is possible to validate these suggestions with data yielded from the quantitative consultation.

While current Chantry Wood campsite price point was considered high in the context of the quality of amenities/ facilities offered, reinforced when considering the price of alternative sites and their standard of facilities it is thought of as having a Unique Selling Point which could justify a higher admission/ price per person; the USP is considered it's semi-wild location and facilities. The capacity for higher user charges were initially framed as an opportunity for the borough council to offset its current losses although concessions were made that delivery of the service were still outside the scope of the authority's core business activity. The potential for greater revenue was discussed as an opportunity to attract delivering organisations which could capitalise on this commercial prospect, allowing the council to retain ownership of the land, discharge the current financial and operational responsibility which is a peripheral activity and protect public use while maintaining the potential for forest school stewardship. Within the quantitative process; more than nine-tenths of those that had used the site (92%) agreed the campsite offered value for money and 73% said they would be willing to pay more than the current fee of £4.75 per night with 66% suggesting they would pay up to £10 per night and 7% that would pay up to £15 per night.

While the concept of a forest school assuming responsibility for the management of public bookings is a fledgling one, feedback suggested by forest school representatives indicated a greater sense of what the responsibility, length of lease/ contract and associated costs could look like would provide a platform to assess the feasibility of opportunity. In-depth interview data indicated the value of a 'worked-up' contract or lease, not necessarily for public consultation but as an instrument to gain a more accurate response and level of interest to the opportunities available to stakeholders.

Within both the qualitative and quantitative strands there was some public enquiry into the capacity for volunteer contribution; this was broadly split into two cohorts of 'redevelopment' and 'maintenance'. Within the quantitative process the focus was primarily on the value of local "volunteers" to undertake "necessary repairs" and engaging "local businesses to make the necessary repairs". The authority was also questioned in terms of appropriateness as an organisation being "responsible for utilising such a great space"?

Within the qualitative engagement there was development to this line of thinking and questions again raised regarding the management of the campsite and the most effective organisation; "There are examples of other parts of the UK where council services are run by community groups, such as libraries and things; there is no reason why an interested stakeholder group couldn't form, even something like a CIC (Community Interest Company) be developed, but the appetite would have to be tested, it is easy to suggest but I have no idea if there is a collective ready to consider this".

While the ideas were fledgling the data indicated an alternative organisation responsible for the management of the campsite is part of some public discourse and represents a further opportunity to 'test' an alternative way of managing the site. An important distinction to make is that only management of the campsite was discussed in this context, not ownership and while the term 'volunteer' was not specifically defined it was used fluidly enough to be interpreted as an alternative to the borough council.

It is clear there are a number of competing priorities across stakeholder groups and a requirement to address the financial shortfall of the site by the borough council. The quantitative data indicated while 'public camping' was the priority, Option C – A campsite for schools and scouts only was ranked a second priority by 32% and their 3rd priority by 41%, although just 8% ranked it as their number one option. The indication then, reinforced through the interest of forest schools in the potential use of the site is to develop framework which supports multi-use (public, schools, scouts and forest schools) under the ownership of the council and the management of a contractor, consortium or partnership.

Therefore, a recommendation can be made which is two-fold:

1. Develop a framework/ contract/ lease which can be tested within the market with potential custodians to inform a formal procurement process.
2. Develop a revised suite of options for further public consultation

The opportunity to engage potential contractors would likely require the development of a greater degree of detail than is currently available in order to expedite the process. The value of a second level plan in this regard may also serve to retain public confidence and provide a message which can be communicated to the wider public, i.e. a desire to retain public access is reflected in the second-level plan we are market testing.

Further public consultation is recommended with caution as it incurs further costs which may not provide a social return on the investment and the data it generates may be negligible in its value. The current intelligence indicates a deteriorating campsite and declining user numbers which is requiring of some investment. Large scale investment would not receive public support although the closure to public use would equally generate a strong and negative public response. The requirements to create an efficient campsite which is commercially viable is likely extraneous to Guildford Borough Councils business model although could provide a commercial opportunity for a third party.

The value of a contractor utilising the current facilities, incentivised further by the councils consideration of a small (circa £30k) investment to make good the current facilities would allay public fear that part of an AONB would no longer be under the authorities ownership and the qualitative and quantitative data relating to site fees suggests for a prospective contract or lease holder the public are willing to spend more money per person, per night than currently experienced by the incumbent.

For completeness, Option E – No campsite was the least popular option with 61% ranked this as their 5th preferred option; 48% of non-users mentioned this as their 5th preferred option compared to 73% of users. In total 15% of non-users stated this as their 1st preferred option compared to just 3% of users.

2.0 Public Literature

Public Literature

To support a public consultation, encourage engagement and familiarity in both the subject and the options being explored the following background information was provided with the consultation documents.

Introduction

We are considering the future of Chantry Wood campsite. This is a small campsite in Chantry Wood which we own and manage. It has been run as a small site for schools, scouts and guides and other groups since the 1960s with some limited forest school use. The campsite needs refurbishing, and to bring it up to meet today's standards and regulations would cost about £300,000.

Why we are consulting with you

We want to safeguard Chantry Wood for everyone to enjoy. We are carefully considering the future of the campsite and its surrounding area. We would like to make the campsite facilities available to a permanent forest school to carry out activities on the campsite and in the woodland, with continuing use by scouts, guides and school groups. Like all councils we have challenging and competing financial pressures. We try to balance the needs of the community with our aim of providing more efficient services. This is why it is important that we review facilities like this, to see whether they should continue and to make sure they are run in the best way possible.

Have your say

We will consider your feedback and use it to help inform decisions on the future use of the campsite. All responses are anonymous and we are working with an independent agency, SMSR Ltd., who will process your replies on our behalf. We are considering the future of Chantry Wood campsite. This is a small campsite in Chantry Wood which we own and manage. It has been run as a small site for schools, scouts and guides and other groups since the 1960s with some limited forest school use. The campsite needs refurbishing, and to bring it up to meet today's standards and regulations would cost about £300,000.

Background information

We want to safeguard Chantry Wood for everyone to enjoy. We are carefully considering the future of the campsite and its surrounding area. We would like to make the campsite facilities available to a permanent forest school to carry out activities on the campsite and in the woodland, with continuing use by scouts, guides and school groups.

Like all councils we have challenging and competing financial pressures. We try to balance the needs of the community with our aim of providing more efficient services. This is why it is important that we review facilities like this, to see whether they should continue and to make sure they are run in the best way possible.

Next steps

We will consider your feedback and use it to help inform decisions on the future use of the campsite. All responses are anonymous and we are working with an independent agency, SMSR, who will process your replies on our behalf.

3.0 Method & Sampling

Method & Sampling

It was important that the methodological approach was robust and wide reaching and therefore it was decided that a combination of methods would be utilised. The overview of the approach was as follows:

3.1 Online Survey

A questionnaire was designed and developed in conjunction with officers at Guildford Borough Council. The process ensured that all draft versions of the questionnaire were piloted and tested. A copy of the final questionnaire can be found in the appendices.

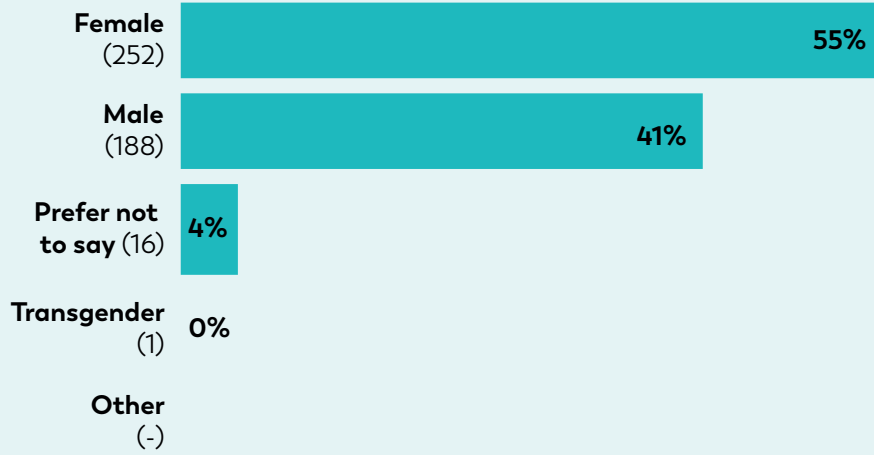
When the questionnaire was approved an online link was produced. This link was promoted to local residents in various ways, including through the issuing of a press release and promotional material/ posters in Chantry Wood. In addition to residential views, the online survey yielded responses on behalf of the following local groups/ organisations:

- Reigate and Redhill Woodcraft Folk
- Surrey Hills AONB Board
- Families of children in local schools, primarily Boxgrove Primary
- Guildford Scouts
- Boxgrove Dads and kids adventure club
- St Saviours Beavers, Cubs and Scouts
- Emmaus Rd Church and Matrix Charity
- Family unit
- 1st Stoughton Scout Group
- Holy Trinity Amenity Group
- Woodcraft Folk

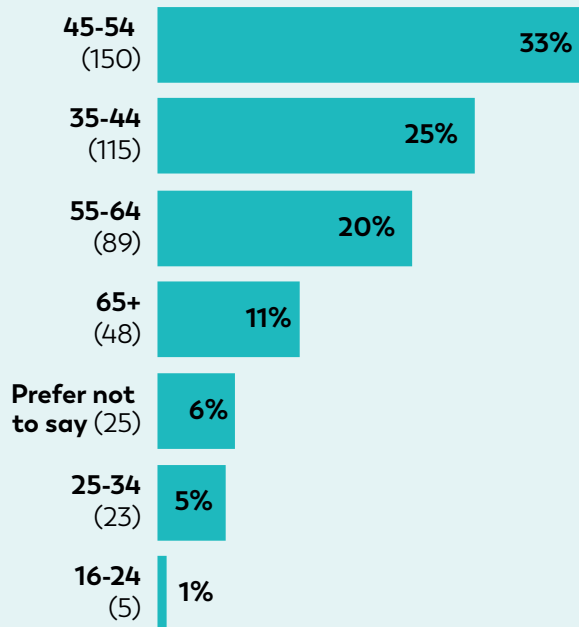
The online survey was accessible via a dedicated page on the council's website from 24 October 2019 to Monday 30 December 2019. A total of 459 residents completed the survey.

The online survey utilised non-probability (convenience) sampling as participants self-selected based on their availability and willingness to take part. The online survey was open to all Guildford Borough residents.

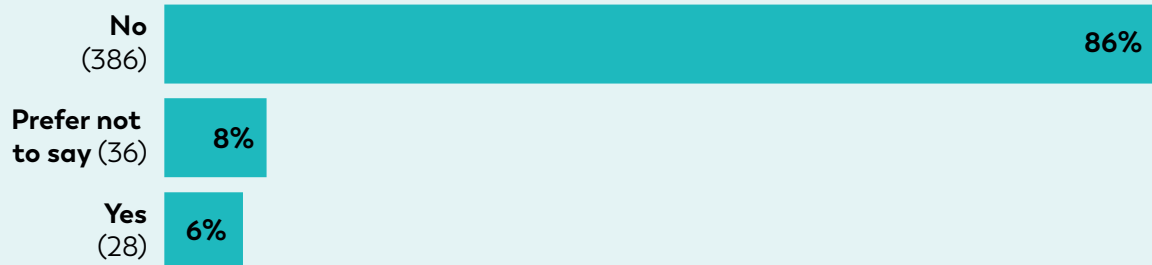
What is your gender?



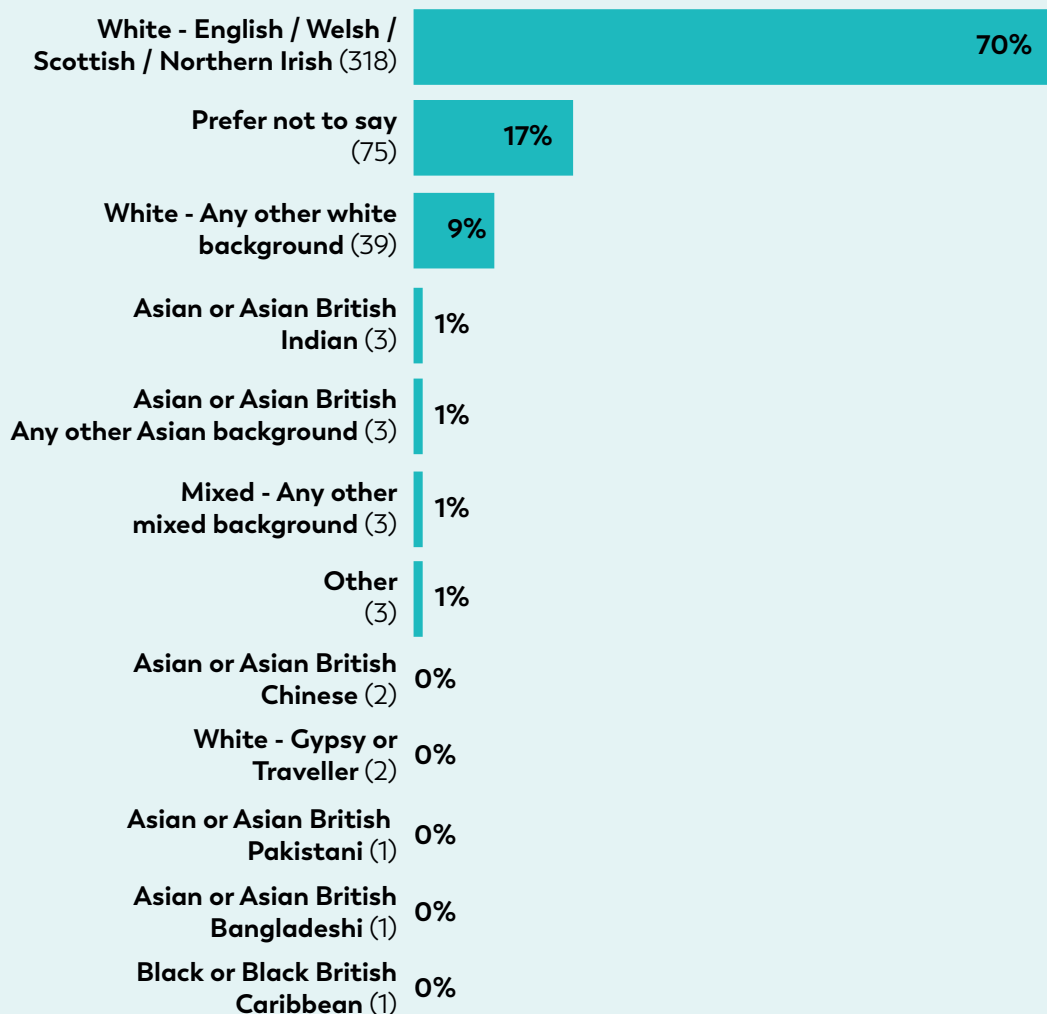
To which of the following age groups do you belong?



Do you have any long-standing illness, disability or infirmity (long-standing means anything that has troubled you over a period of time or that is likely to affect you over a period of time)?



What is your ethnic group?



3.2 Focus groups & in-depth interviews

The qualitative phase of the project was fundamental in ensuring a deeper insight was achieved when considering the future of the campsite. The council provided SMSR Ltd with a list of individuals and organisations that were associated with the campsite or organisations that had an interest in the provision. This contact list included schools, scout groups, forest school providers and individual advocates of the campsite; all individuals and groups had experience of residential stays, day visits or had utilised the Chantries for the delivery of activities (in the case of forest schools).

Of the stakeholder list identified, all were invited to participate in the focus groups delivered at Millmead House, Guildford, on the evenings of the 12th and 13th November 2019; those which were unable to attend a focus group were provided with an opportunity to participate in an in-depth interview in a one-to-one format. 5 stakeholders engaged in the interview process (3 individual residents and 2 forest school representatives). Interviews were conducted both face to face and by telephone at the participants preference between 28th November 2019 and 13th December 2019. Interviews typically lasted between 1 and 2 hours with the addition of several supplementary conversations for the purpose of clarification or further explanation. Interviews followed a semi-structured script to:

- establish the relationship of the respondent with the campsite
- their understanding of the borough council proposals
- their position with regard to a preferred solution
- alternative views and/or preferences for the Chantry Wood campsite

The focus groups were attended predominantly by individual residents although representation was recorded from two forest schools (Wild Learning and Little Rays Forest School) and a Guildford based scouting group (First Normandy Scouts). None of the 5 mainstream education providers/ schools accepted the invitation to attend the qualitative process.

Focus groups lasted approx. 2 hours and were used to give more detailed information to residents so they could have a more informed discussion; initially structured around a short presentation, illustrating a timeline of events from December 2018 up to and including the current consultation and the suite of options for the campsite being tested with stakeholders. The presentation included available footfall and throughput data of the Chantry Wood campsite in addition to revenue generated and forecasted expenditure. The purpose of the presentation was to assume a degree of common currency with participants underpinned by fact and dispel any mistruths related to the sites planning which may have been perpetuated within either the public narrative and/ or media coverage.

Alongside the attendees from the initial stakeholder list, the groups were recruited utilising the council's Citizens Panel and included both users and non-users of the site. 'Users' were defined for the purpose of the consultation as individuals which had experience of residential stays at the Chantry Wood campsite and not solely users of the wider Chantry Wood area.

In total 25 residents attended the two groups (13 & 12) and the sampling process was considered stratified, i.e. each attendee had a similar characteristic (all Guildford residents) while subgroups were identified which in this instance was 'users' and 'non-users' of the campsite. Each group was facilitated by a research consultant from SMSR Ltd and attended as an observer by the Guildford Borough Council Countryside Manager.

4.0 Summary of Qualitative work

Summary of Qualitative Work

Qualitative feedback identified a preference for a campsite which was retained by the borough council with regard to ownership, although managed, via a procured contract to a third party (or parties).

Much of the public resistance was rooted in a perception that the **“the council are just getting rid of assets”** which prompted exploration of scenarios through which the council retained its ownership of the site while the day-to-day management and financial responsibility of the concern was the responsibility of a contractor.

Of interest, during the consultation process, there was no indication that the borough council intended to forfeit ownership of the campsite through sale or transfer yet this was central to public concern; other public concerns were noted within the consultation such as **“...the large fence that is going to be built in the middle of the Chantries around the campsite for a forest school”**. Similarly, the construction of a fence, much like the fear of the site’s sale were not recorded as council thinking but rather emanating from public opposition. This narrative appeared to gain traction through public discussion and media exposure and represented a barrier in engaging stakeholders to identify their preferred options for the campsite.

The benefit of a less structured qualitative consultation, i.e. exploring options which included (and extended beyond) the borough councils five suggested options was an opportunity to test alternative configurations that met both the council’s objectives and public preference.

This included consideration of elements of the different options, fused together to suggest a new alternative. For example, within the qualitative work, participants explored opportunities to retain public bookings for the site, addressing a primary concern that this capacity will be lost through any future changes.

The rationale for protecting public bookings was ingrained in a perception that the Chantries, as a campsite had a number of points of difference to other facilities in the area; **“It is the simplicity of it that you do not get anywhere else, there are not many places in the UK like the Chantry Wood campsite, I would pay more money to keep it as it is”**.

This perception appeared to be a key driver within the qualitative work that also explicitly saw the rejection of the option to invest in the campsite to service current building regulations, compliance and code; **“...no, this is not what the site is about, we don’t want it turned into a generic campsite and we don’t want the council investing their finite resources in this way”**.

Additionally, and alongside fiscal responsibility there was a demonstrable awareness of the Chantry Wood campsite being located within an area of outstanding natural beauty (AONB); **“Any large scale development would upset the ecosystem and from a look at the numbers, there is no guaranteed return on a large development so this should be off the table. In fact, it should never have been on the table”**.

There was further support for maintaining the biodiversity of the area and a challenge to and development of the site; **“There is already irreparable damage to the bluebells in the woods so I would like to see the site returned to its natural state and left to grass over”**. While this opinion was a solitary one within the qualitative work there was a further, sympathetic contribution which rejected any large scale redevelopment, predicated on traffic congestion;

“It is a rat run already and there is minimal parking on the site, when you live close to they woods you suffer as a resident. If you start to develop the facilities and encourage more visitors, it will be a nightmare for local residents... the traffic, the pollution, it will be awful”.

While the contribution from organised groups was small, representatives from a Guildford based Scout collective indicated that the facilities currently were already aligned to the ambitions of the Scout movement and an over-development of the site **“would take something away from what Scout groups take from the experience”.**

The qualitative engagement process was used to test, explicitly, the perception of a forest school being delivered within the Chantry Wood space. Representatives of 4 schools were invited to participate in the process and 3 engaged proactively; a degree of education was required for the wider participants in terms of what a forest school was and in what ways a school would utilise the land. The concept of a **“low-impact” and “environmentally friendly outdoor education service for children”** received a positive response from participants. The challenge, if any was to reconcile how a forest school, a primarily day-service which operate Monday through Friday would be prohibitive to members of the public camping on the site during evening and weekends?

Representatives of the forest schools described how the management of a commercial camping facility was not part of their current business models and therefore remained as an unknown although **“If some more detail was provided it would be something that could be considered”.** The **“detail”**, in this instance was considered to be pertaining to the length and cost of the lease to provide a platform for a prospective forest school **“to consider if we are capable of delivering the service, if there was any financial value and the level of risk involved... it would also allow us to consider if a partnership or collaboration was required to make it viable”.**

Within the in-depth interview process a respondent considered their **“concerns”** regarding the site development; **“Primarily, I am worried that the council are looking to give up their ownership of the campsite and what that is indicative of? Is it the start of a bigger initiative in which more of the land will be parcelled off through sales?”**

When asked to reflect on the options to develop the Chantry Wood campsite while retaining ownership of the land and devolve its management through a lease; the participant described; **“I have no issue with that in principal, but I think an idea would have been to develop a lease, not every detail, but a high-level view of what that might look like. It might allay some fears from an ownership point of view that people might have, like me, and calm any concerns about the site being over developed... it might even help prospective contractors like the forest schools to develop a sense of what is on the table”.**

A similar line of thinking was identified elsewhere within both the group consultation and additional in-depth interviews; **“Some of these options (A-E) are pointless, I think I understand why they have been suggested because the council a required to demonstrate a breadth of thinking, but in reality, a couple of options like B, C and D should be worked up with more detail, because the solution is somewhere in those and a greater understanding of what that looks like would probably move the process on”.**

While the qualitative process was observed as being collaborative there appeared to be a number of contributions within (two of) the in-depth interviews that although related to the campsite were concerned to a greater extent with the Guildford political landscape and the integrity of the consultation. One participant explained;

“There was an absolute abuse of power in the previous administration and I think the current party took the reins on the back of that, people thought they represented an ethical alternative. The problem is, it now looks like they have continued the culture of the previous administration. They (borough council) are very good at responding to certain problems; parking problems and bin problems, but as soon as it is not in the handbook, they struggle. The chancies campsite is not in the handbook so it is like, ‘we don’t understand this particular problem so we will sell it off’. I’m sorry, you can’t do that”.

The concern regarding the decision making of the council within the current Chantry Wood process was further placed into context when the perception of the previous administration and the depth of feeling towards them were revealed; “There were two particular people for me and I think they degraded their office, I think they degraded public office and I considered reporting them to the local government ombudsman because I understand there is a process for that and I think they met the threshold”.

Despite a politically centric view there was an opportunity to develop a response regarding next steps in relation to the process and the participant described; “What I think needs to happen now is more engagement, lets shape what this looks like, collaboratively, together. That way you will start to build political capital. If they (Liberal Democrats) go their best instincts, as Liberals, they will engage the people. That is why the liberals did so well in May, people felt they would hear them”.

A more challenging view held by a participant focussed on the integrity of the consultation, questioning the transparency of the council’s ambition; “Don’t get me wrong I am delighted this consultation has been extended and an independent research service is responsible but there are too many contradictions and too many inaccuracies within the data that has been used to justify the decision”.

The respondent whom reports being active in their opposition to the council decision to initially close the campsite to public use, particularly through the administration of Freedom of Information Requests believes the council to already “have a preferred option, which is to close”; adding, “The site has been left to deteriorate, one of the fire-pits has been back-filled and the grass is not maintained as it should... it’s like the council has tried to close it by stealth”.

When attempting to clarify a position of the respondent in terms of a preference for ‘next steps’ they expressed, “I would like to see the site managed, maintained and simply run properly before a view is taken that it is unsustainable or unfeasible to operate”. When encouraged to consider the suggested opportunities for change (options A-E) and the narrative within the qualitative work which at times was more dynamic, the respondent’s position did not move and considered; “I have heard the argument that management of the campsite is not part of the council’s core business but how this is different from management of a number of other facilities, i.e. a mini golf course? The idea which has been promoted that the site is a scout campsite is a completely false narrative. There is already demonstrable diversity in the use of the site but much of the management of the site marginalises or excludes particular groups... the £5.00 (per person) charge excludes large school bookings. It is not affordable when schools consider the overall cost of a booking, but a sensible approach to the overall price structure might allow groups like schools to be subsidised or even free”.

Asked if consideration of the site operating “**at a loss**” changed their perspective on the future management of the space, it appeared to not alter the view held which considered; “**There is a requirement to have a little more transparency in relation to the proposed investment levels. What is the £35k for? What work will be undertaken for that money? And there are discrepancies in the data offered by the council in the context of visitor numbers. The site has always been a multi-use facility but greater use is by far through families and private bookings. Restricting the access is counter-intuitive to a successful facility as you are alienating two thirds of the users**”.

5.0 Summary of Quantitative Work

Summary of Quantitative Work

The vast majority of respondents (96%) that completed the online survey were aware of the Chantry Wood campsite, just 4% were unaware before they completed the survey.

Just less than half (48%) had never used the facility, 19% had used it once with 22% that has used it 2-5 times and 11% that had used it more than 5 times.

Three-quarters of previous camp users had booked for more than 6 people with 17% that had booked for 6-10 people, 23% that had booked for between 11 and 20 people and 35% who had booked for more than 21 people.

The main reason identified for using the campsite was for recreational camping (67%), 11% said it was for organisational camping, 10% said it had been used for a party and 2% through forest schools.

Satisfaction was very high with all aspects of the campsite experience which included the booking process, location, access and their whole experience, almost a quarter (22%) did however, state that they were dissatisfied with the facilities.

More than nine-tenths of camp site users (92%) agreed the campsite offered value for money and 73% said they would be willing to pay more than the current fee of £4.75 per night with 66% suggesting they would pay up to £10 per night and 7% that would pay up to £15 per night.

Of the five options presented to respondents Option B was considered the most popular with 60% rating this as their first choice and 20% ranked it as their second choice. Option C was ranked a second priority by 32% and their 3rd priority by 41%, although just 9% ranked it as their number one option.

Option E was the least popular option with 61% ranked this as their 5th option. Options A and D received mixed results 44% suggesting option A was their first or second favourite option and 30% ranked option D as their first or second choice.

The table below shows the options ranked in terms of those that said it was their most preferred option:

Option	%
Option B – A campsite for the public: basic facilities	60%
Option D – Forest school education	18%
Option A – A refurbished campsite for the public	15%
Option C – A campsite for school and scouts only	9%
Option E – No campsite	9%

Option E – No campsite was the least popular option with 61% ranked this as their 5th preferred option, this was 48% for users and 73% for non-users.

It is worth noting the difference in opinion between users and non-users in terms of their preferred option.

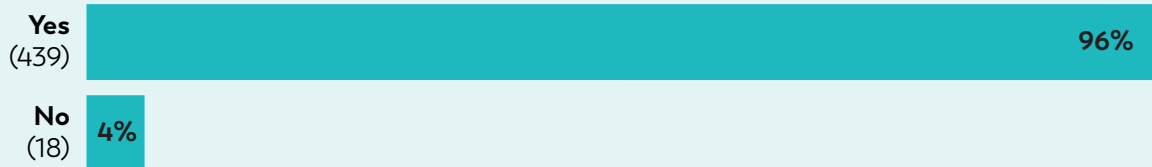
Option	% Users	% Non Users
Option B – A campsite for the public: basic facilities	71%	50%
Option D – Forest school education	10%	24%
Option A – A refurbished campsite for the public	19%	13%
Option C – A campsite for school and scouts only	6%	12%
Option E – No campsite	3%	15%

5.1 Quantitative findings

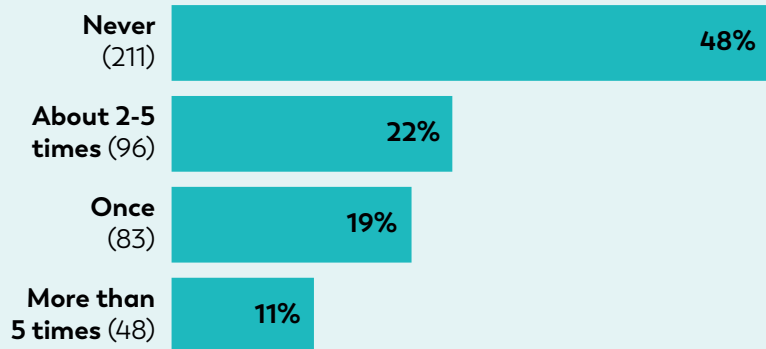
The following results show the key findings from the online survey, which highlight all responses from the completed surveys. Questions on the camp facilities were only asked to those who have used the site.

It should be noted that when reading the results within the report, often percentages will be rounded up or down to the nearest one per cent. Therefore occasionally figures may add up to 101% or 99%. Base numbers may also add up to less than 459 due to missed answers by the respondent.

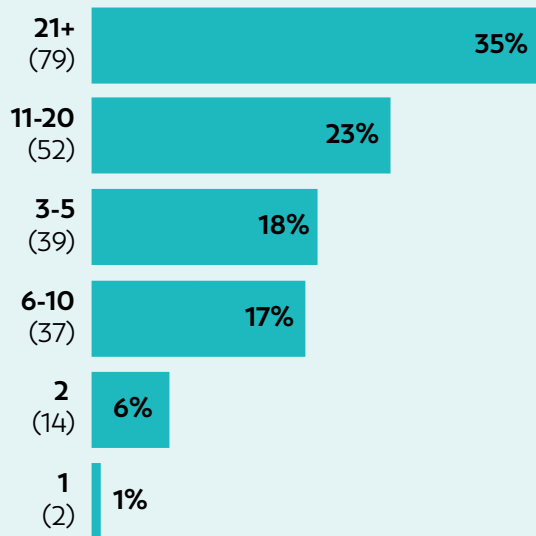
Before the consultation, have you heard of Chantry Wood campsite?



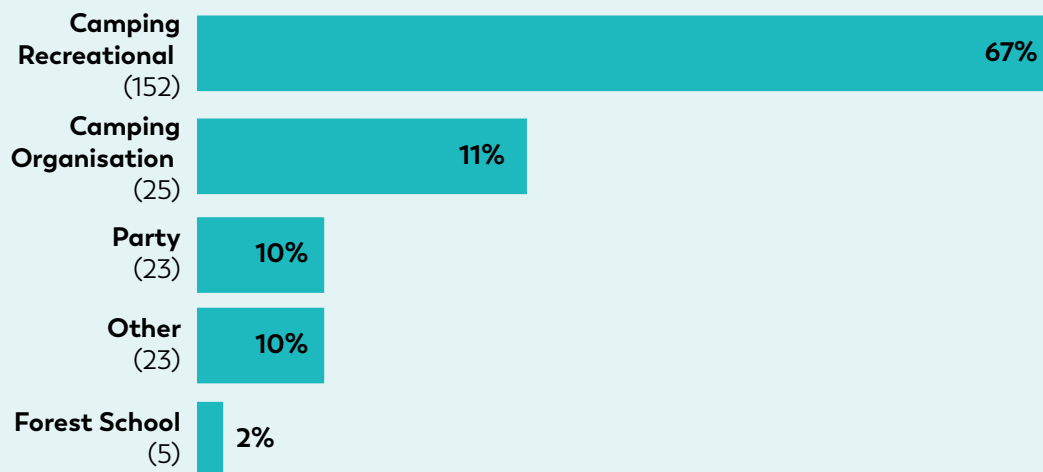
How often have you used the campsite in the last five years?



Thinking back to your last visit, how many people were in the party that booked?

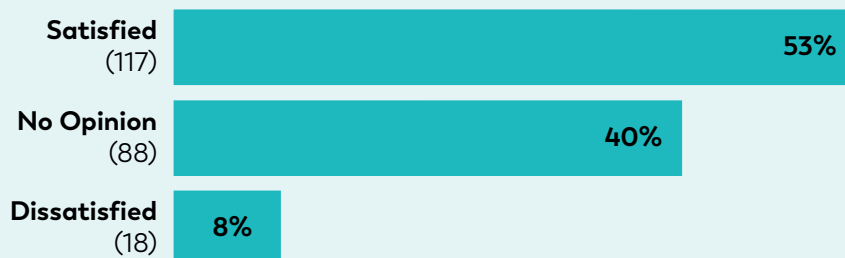


What was the main reason for visiting the campsite?

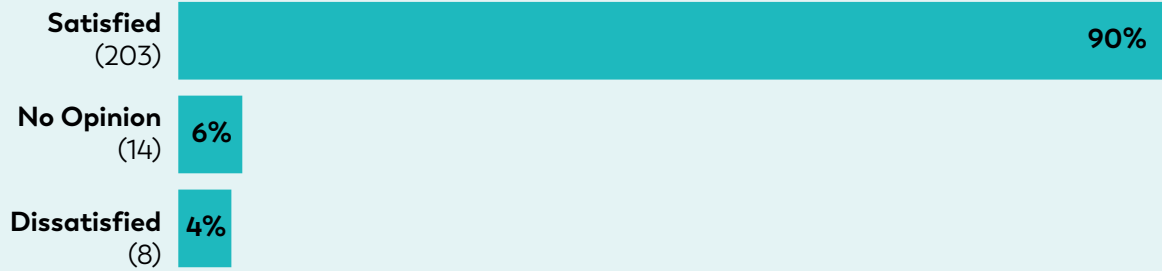


Please specify other
Walking at campsite
Family
Camping as part of my thru-hike on the North Downs Way
Use firepit for youth club
Meeting friends, dog walking, party, forest school & all the above
Brownie campfire
Orienteering
Bonfire Night
West Surrey IVC activity day
School trips
To admire the view
Use of firepits as a group-recreational
Looking
Guides
Class parents and children camping
Walking/Views
Walk through and round it on a daily basis
Dog walking and resting
Walking through mainly, but recreational camping for some members

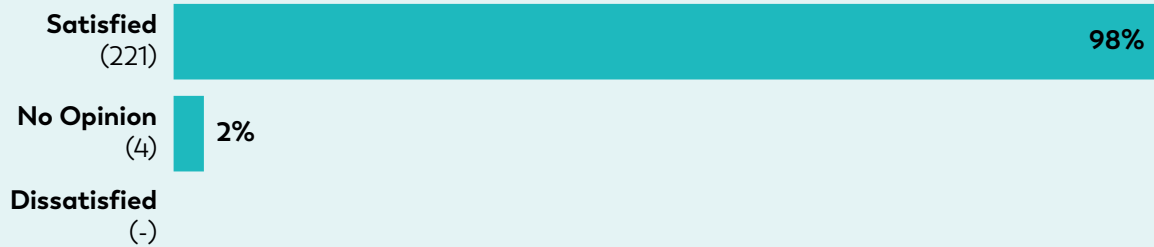
Thinking back to your last visit, how satisfied were you with the following aspects of the campsite: Booking Process



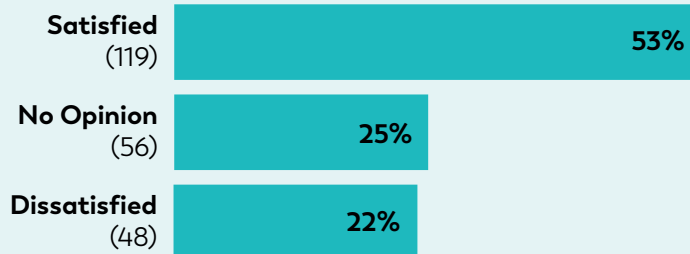
Thinking back to your last visit, how satisfied were you with the following aspects of the campsite: **Access to the site**



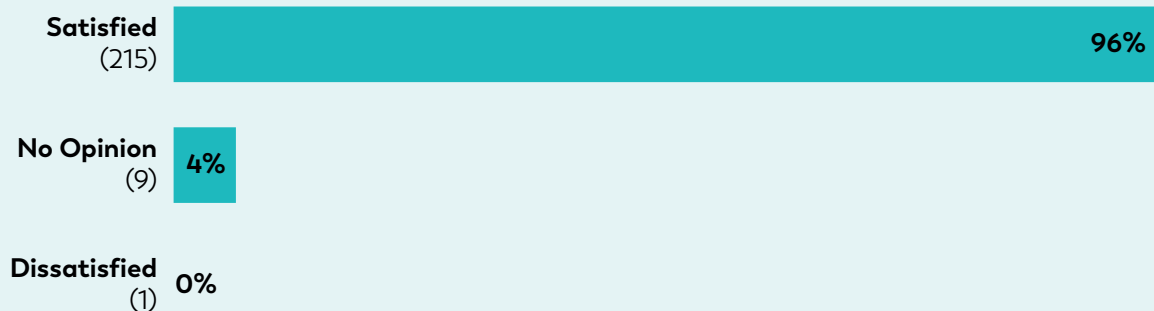
Thinking back to your last visit, how satisfied were you with the following aspects of the campsite: **Location**

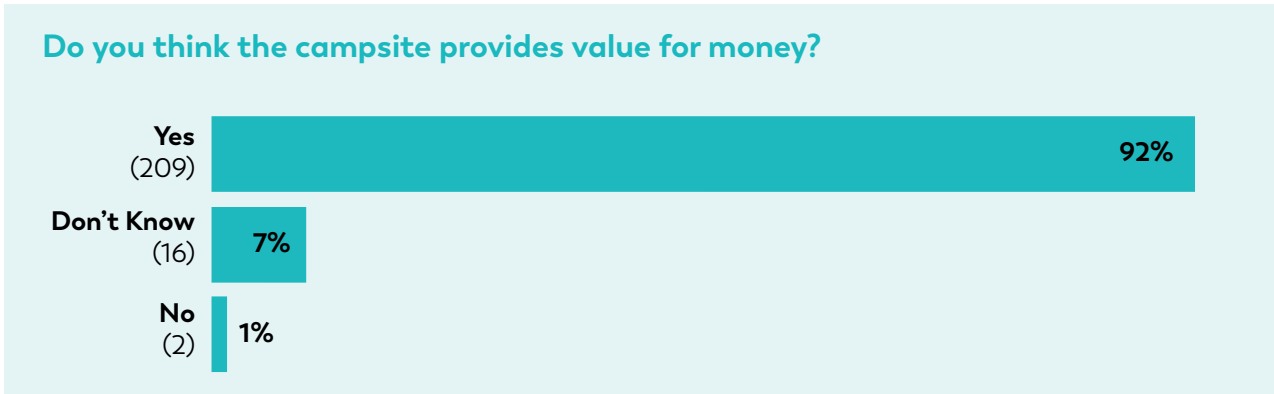


Thinking back to your last visit, how satisfied were you with the following aspects of the campsite: **Facilities (e.g. toilets etc.)**



Thinking back to your last visit, how satisfied were you with the following aspects of the campsite: **Whole experience**

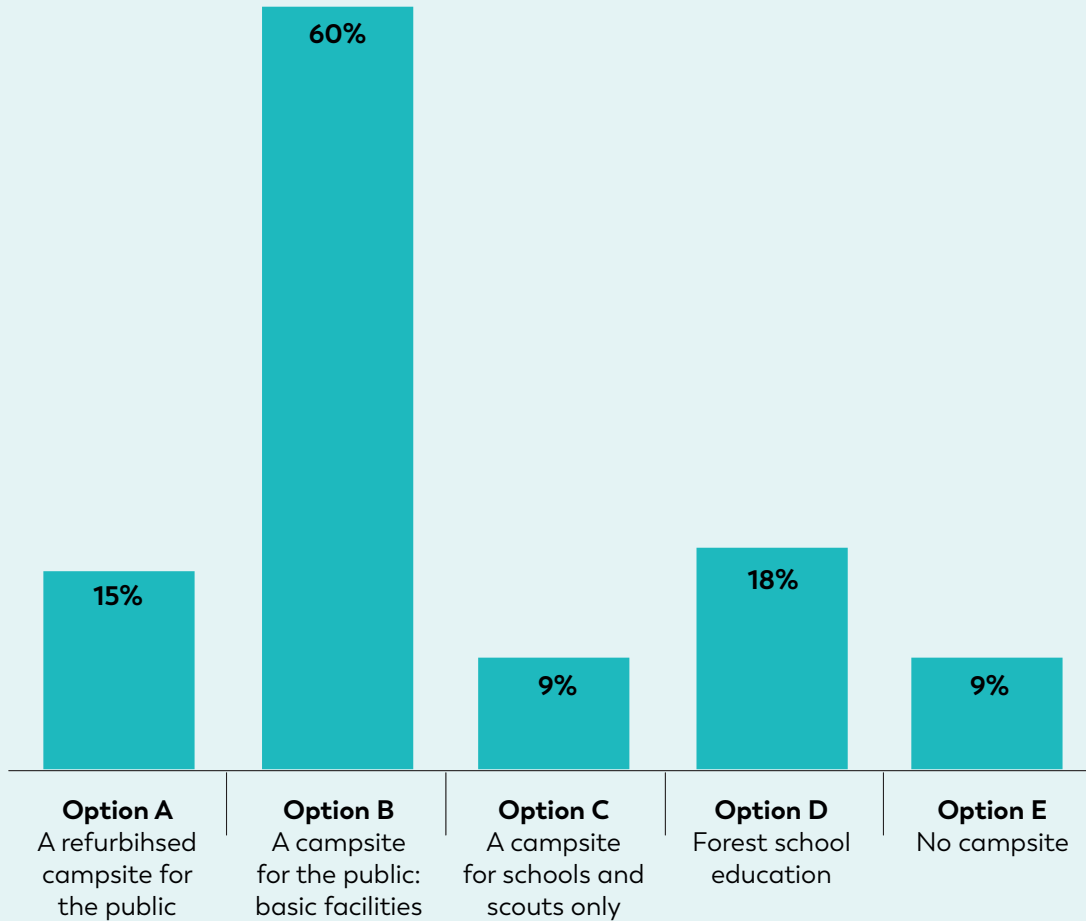




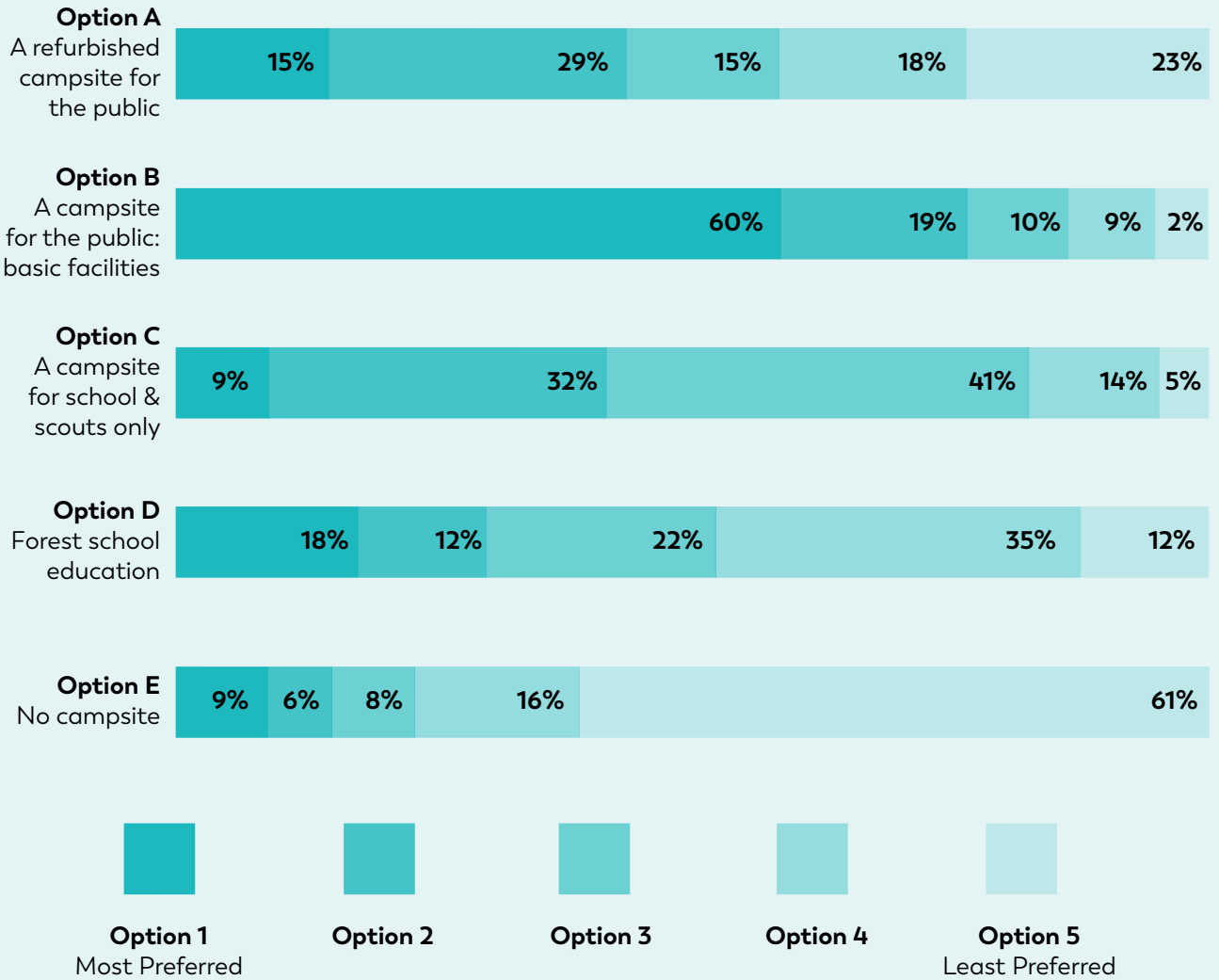
Please rank your preferred option

Option	%
Option B – A campsite for the public: basic facilities	60%
Option D - Forest school education	18%
Option A – A refurbished campsite for the public	15%
Option C – A campsite for school and scouts only	9%
Option E – No campsite	9%

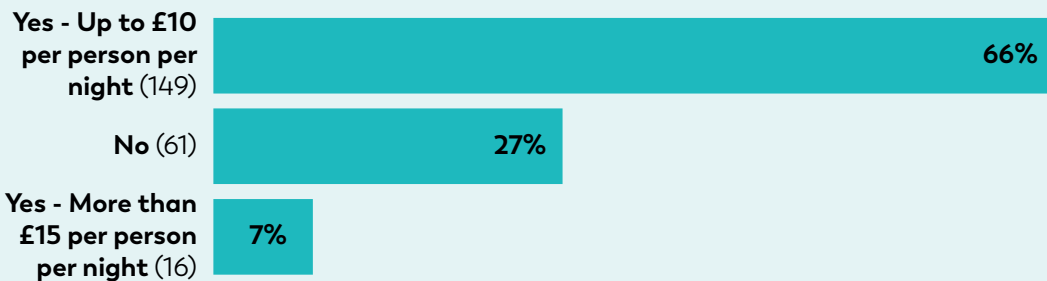
Please rank your preferred option. 1 being your most preferred and 5 being your least preferred option: % Most preferred option



The full break down by the full raking exercise is highlighted in the chart below:



The campsite currently costs £4.75 per person per night.
 Would you be willing to pay a higher campsite fee for the same facilities?



6.0 Appendices

Guildford Borough Council

Chantry Wood Campsite Consultation

We are considering the future of Chantry Wood campsite. This is a small campsite in Chantry Wood which we own and manage. It has been run as a small site for schools, scouts and guides and other groups since the 1960s with some temporary forest school use. The campsite needs refurbishing, and to bring it up to meet today's standards and regulations would cost about £300,000.

Why we are consulting with you

We want to safeguard Chantry Wood for everyone to enjoy. We are carefully considering the future of the campsite and its surrounding area. We would like to make the campsite facilities available to a permanent forest school to carry out activities on the campsite and in the woodland, with continuing use by scouts, guides and school groups.

Like all councils we have challenging and competing financial pressures. We try to balance the needs of the community with our aim of providing more efficient services. This is why it is important that we review facilities like this, to see whether they should continue and to make sure they are run in the best way possible.

Have your say

We will consider your feedback and use it to help inform decisions on the future use of the campsite.

All responses are anonymous and we are working with an independent agency, SMSR, who will process your replies on our behalf.

Background information

There are currently limited facilities at the campsite – chemical toilets that must be emptied by the customer, no electricity and limited water supply. These limited facilities restrict the current use to single party bookings.

There were 1,263 visitors [is that separate groups or individuals?] in 2017.
2018 figures
2019 figures

The campsite costs about £5,000 a year to run.

Next steps

After the consultation we will review your feedback. The Council's Executive will then consider a report with recommendations for the campsite's future early next year.

Look out for more information on our website, Facebook and Twitter and in the local media.

Please click NEXT to start the survey.

About you

Q1 Do you live in the borough?

- Yes
- No

Q2 Are you responding as:

- Individual
- On behalf of a group

Q2a Is the group in the borough?

- Yes
- No

Q3 Before this consultation, have you heard of Chantry Wood campsite?

- Yes
- No

Use of campsite

Q4 How often have you used the campsite in the last five years?

- Never
 Once
 About 2-5 times
 More than 5 times

Q5 Thinking back to your last visit, how many people were in the party that booked?

- 1
 2
 3-5
 6-10
 11-20
 21+

Q6 What was the main reason for visiting the campsite?

- Camping - recreational
 Camping - organisation
 Forest school
 Party
 Other

Please specify other

Q7 Thinking back to your last visit, how satisfied were you with the following aspects of the campsite:

	Satisfied	No Opinion	Dissatisfied
Booking Process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to the site	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Location	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilities (e.g. toilets etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Whole experience	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q8 Do you think the campsite provides value for money?

- Yes
 No
 Don't know

Please say why.

Q9 The campsite currently costs £4.75 per person per night. Would you be willing to pay a higher camping fee for the same facilities?

- Yes - Up to £10 per person per night
- Yes - More than £15 per person per night
- No

Future of the campsite

We would like your views on the following possible options for the future of Chantry Wood campsite. Please read the following and tick your preferred option.

Option A – A refurbished campsite for the public - The Council would provide a campsite for the public at Chantry Wood, with showers, changing rooms, washing facilities, hot and cold running water and mains toilets. This would cost about £300,000 for electricity, water, major works including some tree removal to provide the infrastructure. An increase in visitor numbers and bookings per night would be needed to offset some of the investment costs. This would change the tranquillity and habitat of the area and increase traffic [or could we say numbers] through the woodland. The Council might be able to make a small annual profit of £2,500.

Option B - A campsite for the public: basic facilities - The Council would continue to provide a campsite with the existing basic facilities (chemical toilets and cold water supply). Repairs would cost about £36,000. The Council would continue to subsidise the campsite, costing about £5,000 a year.

Option C – A campsite for schools and scouts only – The Council would continue to provide a campsite with the existing basic facilities. Repairs would cost about £36,000. The Council would continue to subsidise the campsite. Running costs would be much lower than Option A.

Option D - Forest school education - The Council would make the campsite available to a forest school to carry out educational activities on the campsite and in the woodland. It would improve forest school provision in Chantry Wood. Scouts, guides and school groups would continue to use the campsite. Camping would not be available to the public. This option would cost about £36,000 for repairs to the existing facilities. The Council would generate an annual income of about £7-9,000 which would cover the repairs and ongoing maintenance costs. Conditions would be put in place to limit numbers.

Option E - No campsite – The existing buildings would be removed and the campsite area would be returned to grassland and woodland for nature conservation. This would cost about £8,000. There would be no further running costs to the Council.

Q10 Please rank your preferred option 1 being your most preferred option and 5 being your least preferred option:

Option A – A refurbished campsite for the public

Option B - A campsite for the public: basic facilities

Option C – A campsite for schools and scouts only

Option D - Forest school education

Option E - No campsite

Option F - None of the above

Please say why you said 'None of the above':

Q11 Any further comments you would like to make?

A large, empty rectangular box with a thin grey border, intended for the respondent to provide any further comments. The box is currently blank.

About you

Finally, a couple of questions about yourself, so that we can understand the views of a whole range of people...

Q12 What is your gender?

- Male
- Female
- Transgender
- Other
- Prefer not to say

Q13 To which of the following age groups do you belong?

- 16-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65+
- Prefer not to say

Q14 Which of these activities best describes what you are doing at present?

- Employee in full-time job (30 hours or more a week)
- Employee in part-time job (under 30 hours a week)
- Self-employed
- In full-time or part time education/training
- Not currently working/unemployed (including if on long-term sickness or disability or looking after the home or family)
- Retired
- Doing something else
- Prefer not to say

Please specify 'Doing something else'

Q15 Do you have any long-standing illness, disability or infirmity (long-standing means anything that has troubled you over a period of time or that is likely to affect you over a period of time)?

- Yes
 No
 Prefer not to say

Q16 How many children aged 18 and under live in your household?

Q17 What is your ethnic group? Are you Asian, Black, or of a mixed background, White, or of another ethnic group?

- Asian or Asian British – Indian
 Asian or Asian British – Pakistani
 Asian or Asian British – Bangladeshi
 Asian or Asian British - Any other Asian background
 Black or Black British - Caribbean
 Black or Black British – African
 Black or Black British – Any other Black background
 Asian or Asian British – Chinese
 Mixed –White and Black Caribbean
 Mixed – White and Black African
 Mixed – White and Asian
 Mixed – Any other mixed background
 White – English / Welsh / Scottish / Northern Irish
 White – Irish
 White – Any other white background
 White – Gypsy or Traveller
 Other
 Prefer not to say

Q18 What is your postcode

Thank you for taking part in our survey.

6.2 Graphical presentation of option by option respondent preference

The following charts breakdown respondent preference for each of the suggested options for the Chantry Wood campsite. The reference, the options were described as:

Option A – A refurbished campsite for the public

The Council would provide a campsite for the public at Chantry Wood, with showers, changing rooms, washing facilities, hot and cold running water and mains toilets. This would cost about £300,000 for electricity, water, major works including some tree removal to provide the infrastructure. An increase in visitor numbers and bookings per night would be needed to offset some of the refurbishment costs.

This would change the tranquillity and habitat of the area and increase traffic through the woodland.

The Council might be able to make a small annual profit of £2,500.

Option B - A campsite for the public: basic facilities

The Council would continue to provide a campsite with the existing basic facilities (chemical toilets and cold water supply). Repairs would cost about £36,000. The Council would continue to subsidise the campsite, costing about £5,000 a year.

Option C – A campsite for schools and scouts only

The Council would continue to provide a campsite with the existing basic facilities. Repairs would cost about £36,000. The Council would continue to subsidise the campsite. Running costs would be much lower than Option A.

Option D - Forest school education

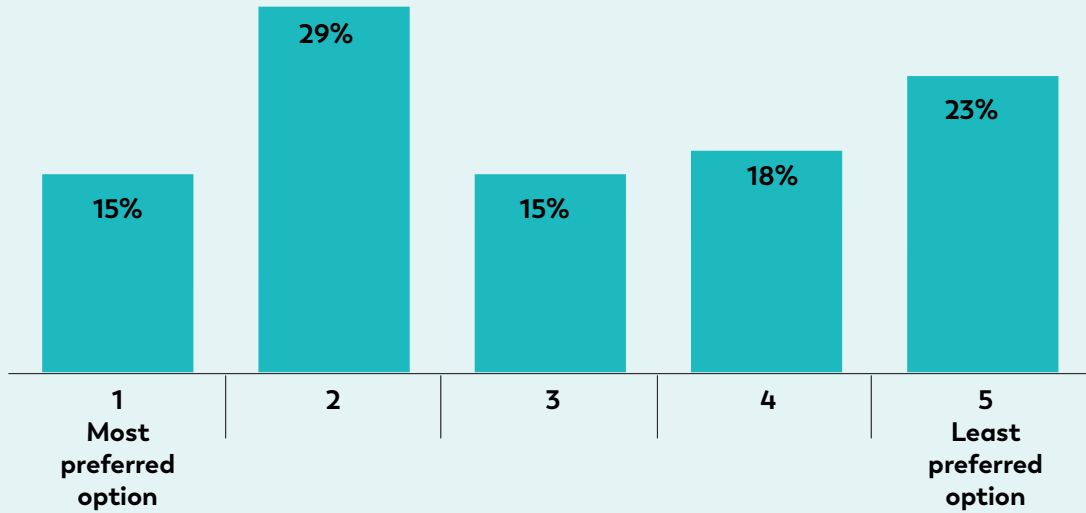
The Council would make the campsite available to a forest school to carry out educational activities on the campsite and in the woodland. It would improve forest school provision in Chantry Wood. Scouts, guides and school groups would continue to use the campsite. Camping would not be available to the public. This option would cost about £36,000 for repairs to the existing facilities. The Council would generate an annual income of about £7-9,000 which would cover the repairs and ongoing maintenance costs. Conditions would be put in place to limit numbers.

Option E - No campsite

The existing buildings would be removed and the campsite area would be returned to grassland and woodland for nature conservation. This would cost about £8,000. There would be no further running costs to the Council.

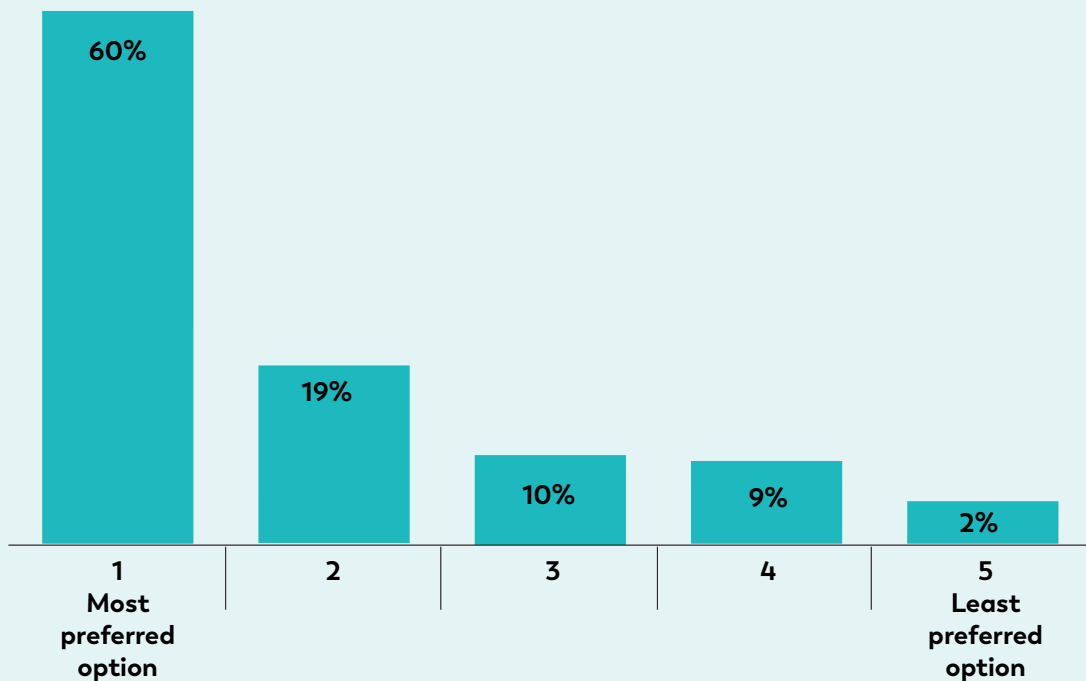
Option A:

Please rank your preferred option. 1 being you most preferred option and 5 being your least preferred option (**% Most preferred option**)



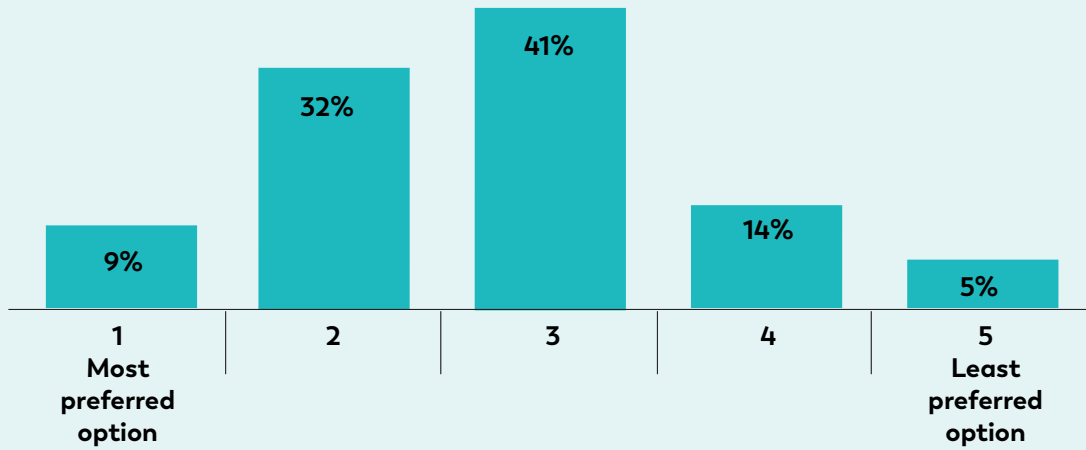
Option B:

Please rank your preferred option. 1 being you most preferred option and 5 being your least preferred option (**% Most preferred option**)



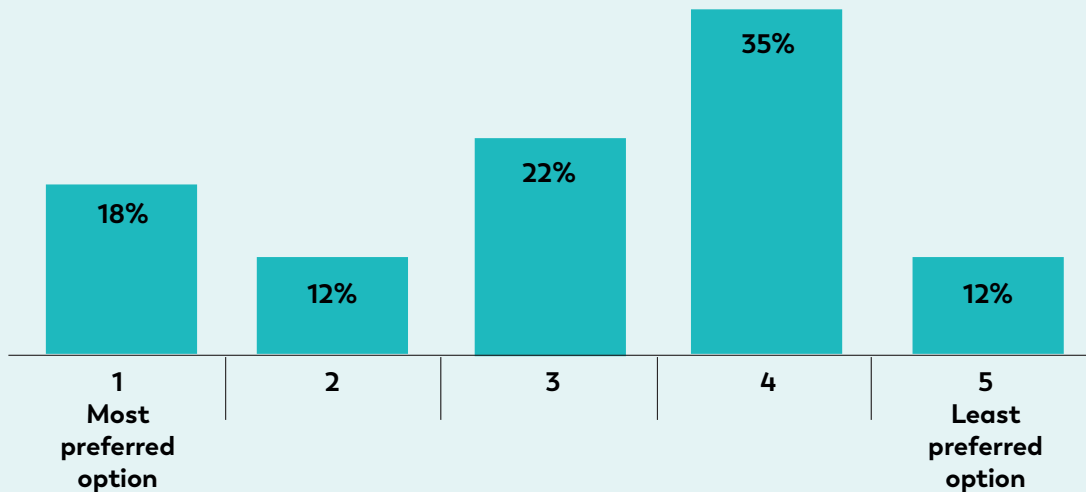
Option C:

Please rank your preferred option. 1 being you most preferred option and 5 being your least preferred option (**% Most preferred option**)



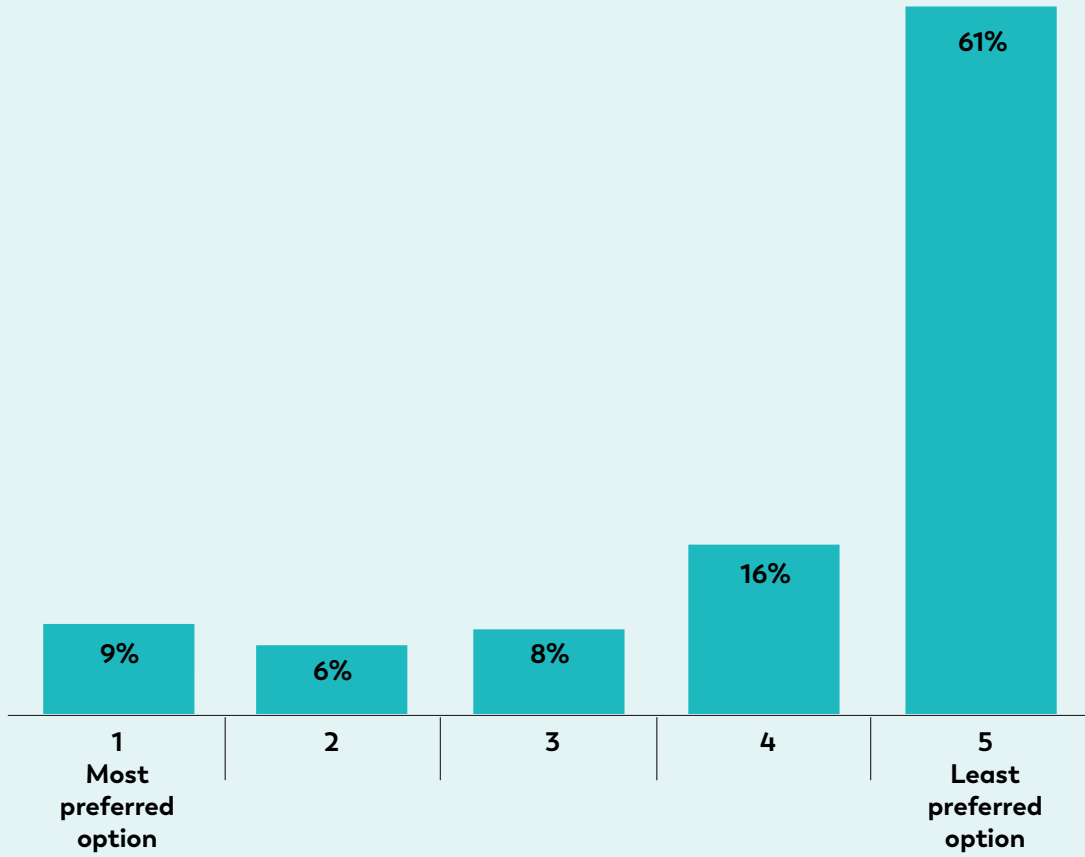
Option D:

Please rank your preferred option. 1 being you most preferred option and 5 being your least preferred option (**% Most preferred option**)



Option E:

Please rank your preferred option. 1 being you most preferred option and 5 being your least preferred option (**% Most preferred option**)



		Total
Please rank your preferred option 1 being your most preferred option and 5 being your least preferred option: Option A – A refurbished campsite for the public	Sample Size	342
	1 - Most preferred option	
	Count	53
	Column %	15%
	2	
	Count	99
	Column %	29%
	3	
	Count	50
	Column %	15%
4		
Count	61	
Column %	18%	
5 - Least preferred option		
Count	79	
Column %	23%	

Option B - A campsite for the public: basic facilities	Sample Size	387
	1 - Most preferred option	
	Count	233
	Column %	60%
	2	
	Count	74
	Column %	19%
	3	
	Count	37
	Column %	10%
4		
Count	35	
Column %	9%	
5 - Least preferred option		
Count	8	
Column %	2%	

Option C – A campsite for schools and scouts only	Sample Size	333
	1 - Most preferred option	
	Count	29
	Column %	9%
	2	
	Count	106
	Column %	32%
3		
Count	136	

	Column %	41%
	4	
	Count	47
	Column %	14%
	5 - Least preferred option	
	Count	15
	Column %	5%

Option D - Forest school education	Sample Size	338
	1 - Most preferred option	
	Count	62
	Column %	18%
	2	
	Count	40
	Column %	12%
	3	
	Count	75
	Column %	22%
	4	
	Count	119
	Column %	35%
5 - Least preferred option		
Count	42	
Column %	12%	

Agenda item number: 5

6.3 Cross-tab presentation of option by option respondent preference

Appendix 1

Option E - No campsite	Sample Size	328
	1 - Most preferred option	
	Count	30
	Column %	9%
	2	
	Count	21
	Column %	6%
	3	
	Count	27
	Column %	8%
4		
Count	51	
Column %	16%	
5 - Least preferred option		
Count	199	
Column %	61%	

Option F - None of the above	Sample Size	409
	Option F - None of the above	
	Count	6
	Column %	1%

Chantry Wood Campsite Consultation

Further Comments



GUILDFORD
B O R O U G H



Any further comments you would like to make...?

- The campsite is a beautiful part of the chuntries and needs to be kept as rural as possible. Improving facilities for school/scout use is good. Spending £300,000 is too much and could surely be spent in local schools/nurseries to improve those facilities and benefit many more individuals.
- We have always really enjoyed staying at the campsite and although the facilities are limited, it is a very special place. Thanks, have the campsite to ourselves is good. A slight improvement in facilities such as a composting toilet would be welcome.
- Please continue to provide public access to the campsite. Our family has had many wonderful experiences there. Restricting it to Forest school use would be fundamentally unfair to the rest of the community who would be denied camping access to an amazing site. Increasing fees to pay for new facilities would seem to be the way forward.
- These plans are great, but none of them are sufficient if you don't deal with the most fundamental flaw of the site: The main issue we found was the safeguarding aspect of people walking through our camp at all hours of the day and night. People stopping to watch our young people playing group games, dogs off leads early in the morning sniffing for food. Nobody malicious, but you just don't know. We had to be watching out all the time to see who was on the site. As a local youth group, we had been really keen to try the site and had been trying to book for years, but didn't feel afterwards that we could take our young people again as we couldn't guarantee even vaguely sensible safety precautions to their parents.
- For goodness sake, please don't start charging the general public just to walk there, we DO NOT want another 'Newlands Corner' situation!!
- Option B, then C, D, A and E.
- Option B is best. The reason the campsite is so loved is because it has a real "back to basics" feel about it. Families love using this area and it is an important asset to have available to Guildford residents and visitors from further afield.
- The whole appeal of camping here is that it is basic and part of the countryside. Having the whole site to yourself was also a huge attraction as the kids can run around and play in the woods without fear of annoying other campers and in safety as they can still be seen from the site. To develop this with more facilities so more campers can stay would ruin the tranquillity of the site, especially removing trees to make way for bigger facilities. You make the facilities quite clear at time of booking so there is no surprise when you arrive. It would be a real shame to stop allowing the public access to camp here, it's part of its uniqueness.
- The site is great as it is - a natural camping location that has minimal impact on the surrounding area. We - with a number of other local families come every year.
- I think the campsite is wonderful and hope it continues to be available as it is today. Is it a real asset to the community? A lot of its charm (and the joy our children get from it) is how under developed it is.

- It would be nice to have a campsite that is open for booking by local people, but not traipsing large numbers of people from other places through the area.
- We stayed with a big party of adults and children in the summer. A great time was had by everyone. It was a real pleasure to see the children playing free and wild in the woods with their friends and experiencing nature.
- Option 1C schools and scouts, option 2E and option 3D. Unable to put these numbers in boxes above.
- Not sure if my numbers registered as I'm doing this on the phone. 1 for public - basic facilities, and 2 for public - refurbished. Don't feel strongly about the remaining three options but think it would be really important to ensure that if this is opened up to increased public use that you preserve the tranquillity and environment. This is a beautiful spot and so much of its appeal is that it is not too developed and that it is a wild escape, that groups can use to gain an experience of living close to nature.
- The campsite is a brilliant and beautiful asset that should remain open to the public. My family and friends have enjoyed some of our favourite camping trips at the site and we hope that this continues to be open to us and all families for years to come. If it comes down to cost, it does not matter if the facilities are basic.
- Keep the campsite open for Guildford residents, but promote it more. I think a lot of people don't know about it.
- We have taken our two daughters to the campsite every year since they were born (our oldest is now 11) and they have both loved it. It is magical to be able to go camping so close to a big town and get the feeling of being somewhere rural. The fire pits provide endless entertainment for the young and a great place for us parents to huddle around and catch up. One of the gems of Guildford.
- This is such a lovely site! There aren't any other campsites near Guildford that will take a larger group. It would be such a shame to lose this facility for the public.
- It's a great place as it is and its appeal is its basic nature.
- It's a fantastic location and it's great that it's as basic as it is. It really feels like you are in the wild (but actually Guildford is so close). Pit toilets would be fine if chemical toilets needed to be removed. It works in Canada!
- Focus on the environment is key, especially given the emergency declared recently. The expansion to have shower blocks etc. should be avoided as this would impact the local area much more. We walk at Chantry every day and love how untouched it remains. Walkers, runners and dog walkers use this site and need to be considered too.
- This is a great campsite for those with young families to attend. There doesn't seem to be a plan to encourage families here.
- I think it's important to maintain the tranquillity of the area.

- I've grown up in Guildford and moved back 10 years ago, it's only last year that I knew you could hire the campsite. What a shame for us, but I hired last year and only one group can hire for a whole weekend, this doesn't make practical sense, especially over busy summer periods when your demand is high. Consider better marketing. I don't disagree with Forest school, but I think it wrong to give to one Forest school company, this is monopoly, but why can't it be offered to a few companies to manage over the weekdays only to run concurrently with the campsite, as they are generally in the woods anyway.
- Option B, A, C and then D.
- The beauty of the campsite is that it is low key and simple, allowing people to respect the woods.
- I only support option B. There are plenty of places to camp in the south east of England with "proper" facilities. We camp at Chantry Wood because it is basic and unspoilt, and therefore is a really special family experience. I assume the costs listed in option B do not take into account an increased nightly fee. I imagine if it did rise to £10 per person that annual cost quoted would be largely if not wholly offset. This is a really special facility and we all camp there because it is different.
- A more developed campsite would ruin the beauty of Chantry Wood.
- Plant more trees.
- The magic of the site are its simple facilities - toilets and running water and the amazing location. Flushing toilets would be a good improvement. A refurbished site for the public would damage the environment, there are also plenty of public campsites around. Use by a Forest school is fine but they should not take booking priority.
- Intrusion into this Green Belt site should be kept to the absolute minimum. I dislike options C and D which limit public access and enjoyment of the site. Therefore, strong preference for options B or E. I live nearby.
- In all the years I've walked through this part of the Chantries I've hardly ever seen someone camp there who was not part of a school/scout/youth group. They are the obvious beneficiaries of this wonderful space. Paying out for a hardly used public facility at £360k makes no sense at all.
- I am not sure I can answer the above about ranking options as perhaps it's not iPhone friendly. I am happy with a basic campsite and keeping the area as close to nature as possible. I would not support the forest school as this limit's user groups to school age children rather than all ages.
- I do not feel this site merits a campsite because there are no parking facilities in the woods. The nearest car parks are at the bottom of St Martha's Hill, which is small and always full at the weekends, and the other end of the Chantries at Pilgrims Way. This is a small car park and a good way from the proposed site.

- If it isn't broke don't fix it. Leave it to run as a basic campsite and charge a little extra for repairs. I am strongly opposed to any other option.
- Just upgrade the barn to provide basic bunk beds like those of Scottish Bothies, and include a covered veranda for outdoors cooking.
- The area is interesting because it is wild and basic.
- I'm strongly in favour of the campsite remaining open to the public and to scouts, brownies etc. with basic facilities but I think it's worth considering whether some of these options can be combined e.g. Forest school Monday-Friday and term time Monday-Thursday but the campsite remains open to the public and/or scouts/brownies etc. with basic facilities during holidays and at weekends (Friday-Sunday).
- The fact the campsite has minimal facilities is what makes it such a good campsite. There are plenty of privately run modern, busy and overcrowded campsites in Surrey already. The location of this campsite makes it perfect for long distance walkers/runners, and in my opinion should be left as it is, with minor repairs. I am sure volunteers could be found for this.
- The combination of nature and simple facilities works well.
- A low-key campsite aimed primarily or exclusively at giving children the experience of sleeping under canvas and enjoying the adjacent woodland and views during the day seems the most appropriate. They would have simple but hygienic toilets and showers. Being in the AONB it would accord with the Government's Glover Review recommendation "a night under the stars in a national landscape for every child". The health and wellbeing benefits for children would be significant and the experience would stay with them for life.
- This is an incredibly special place made all the more beautiful by the fact that the facilities are basic. I worry that expanding the campsite and improving the facilities will only end up destroying the charm of the campsite. Currently it is a place I go every year with my family and friends to escape and relax. I like the fact that there is no shower etc and no other campers around!! I would rather there was no camping at all or that the campsite was used as a Forest school than see the site covered with litter and used by people who do not fully appreciate it. PLEASE keep the campsite just as it is. It really is one of my favourite places and I feel immensely privileged to be able to use it.
- Leasing for Forest school use would exclude the general public, I assume. More encouragement to all families to make use of the campsites would encourage local families who are 'time poor' and may never have had this back to nature experience to share the experience of outdoor living - roughing it with their children. How many families know of its existence? The rental of a family tent might also attract families without the means to have this experience.

- I have visited many campsites over the last few years and Wild camping is all the rage. Low impact on the environment and getting back to nature. GBC are missing a big market by only allowing one booking at a time. No other campsite does this! You have the space to have at least 15 tents so charge per tent and allow multiple bookings! Fill your campsite like others are doing. Remove the big fire pits and rent small fire pits at £5 a night, all other campsites do this. Also sell logs at £5-£8 per sack again all campsites do this. Please look on any camping booking sites you can sign up I'm sure and they will run it for you! People wanting to book get info on how many pitches are left and a confirmation email directly/ instantly when they book and make card payment with a reference no. You would be making money not losing it! There are only 2 campsites in Surrey and the chantry's is one of them.
- Forest school please! Great idea - get our children outside & in our wonderful countryside.
- The campsite is just perfect as it is. We are loving it and are camping there at least twice a year. Please leave it as it is and don't sell it off to private schools. it is much loved and appreciated by local residents, and its beauty is the basic facilities that it has, that keeps the area untouched and natural. We don't need any improvement; we love it just the way it is!
- The fact that it is basic makes the whole experience an enjoyable one!
- This campsite is a fantastic resource that makes access to nature and a camping experience available to all. If it is refurbished, I would like to see it done in a sustainable way - compost toilets? As it is a small campsite, the impact on the environment would be minimal. Local forest schools could have exclusive use of the site at certain times as well and consult on - and assist with - sustainable management and maintenance.
- Toilets are the only thing that need improvement the rest was great as it is.
- The campsite is a wonderful public space giving all the chance to enjoy affordable wild camping. I would be very aggrieved if public accessibility was removed.
- It seems there is no consideration for an option somewhere between A and B. For example, you could provide main toilets and washing facilities but you don't need changing rooms or even showers as most people would use it for weekend use - there are many simple campsites which operate like this and are more successful. Also, the funding for improvements could be partially or entirely achieved through crowdfunding, sponsorship, or you could get local people to help with the work. The website needs to be improved and there would need to be money spent on advertising. The current losses are in large part because outside of the local community people simply don't know the campsite exists. With improved toilet facilities and decent marketing, the current campsite could be improved and at least the losses minimised. It seems that the options presented have not been well thought through, are the people making these options regular campers - do they know what people want in a campsite?
- Children are spending less time outdoors so any improvement in facilities which will encourage families as well as schools and scout groups etc. to get out and enjoy nature - as long as traffic can be managed sensitively - should be encouraged.
- Mark out route to reach campsite.

- My preference would be to leave it as much like it currently stands as possible. Small groups of children should be able to enjoy the environment but equally camping in such a natural setting should be a fairly basic pastime. Makes you appreciate the facilities at home when you get back.
- This campsite is right next to the North Downs way - it should be busy but is not properly advertised and booking was a shamble. It's good to see there's something more proper in place now. The way you have worded option A to influence people's choices is pretty disgraceful. Unless you're planning extensive unmentioned works beyond the campsite itself it's not going to be changing the habitat of the area, and any change to the 'tranquillity' applies to all the school/scouts/forest school options too but goes unmentioned. You should withdraw this survey with an apology and reword.
- I walk this area frequently and we should discourage any new buildings on it. Young people should be encouraged to camp there and learn how to sleep in tents, empty toilets and make fires- it should not become a building site.
- No need to upgrade it (i.e. option A) because it is fine as it is. It offers basic facilities that allow users a genuine outdoor experience. Why spend so much money?
- Keep campsite public and affordable for local people.
- This is an excellent local resource which should be available to all. I have never camped there but have used the site for picnics.
- The campsite is already out of keeping with the chantries - the only way to improve the area would be to remove it altogether.
- I'd like to see it used for educational purposes, especially important for the coming generations. I'd also like to see as little impact on the area as is practicably possible, it's a beautiful spot.
- The campsite should remain, it is in a beautiful setting with good walking trails. It should be preserved for future generations to enjoy.
- I would vote for option A and B. The campsite should be available for public use and not Just scouts/guides Forest school. They should be allowed to book like the general public and pay accordingly.
- It already takes income from forest schools which are I think run independently from the campsite. Are you seriously saying the forest school having additional use for camping will generate an extra £9k? The maths is crazy.

- There is definitely another option that sits between option A (new facilities) and option B (as is) where the existing facilities are upgraded but without the need for full utilities (electricity / mains water / plumbed toilets etc). I have stayed at several campsites that successfully blend wildness and convenience that certainly haven't cost £300k to set up. I would suggest consulting with someone who can advise on the various options available. The problem with the site at the moment is it feels very utilitarian, but if it had more of back-to-basics wild glamping vibe with slightly upgraded facilities I think you could charge more and get more people staying there without it 'changing the tranquillity and habitat of the woodland' Having discussed this with many of my friends who have primary school aged children and live in and around Guildford, we are all in agreeance with this approach.
- The chantries campsite is lovely because it doesn't impact the woodland and allows people to get closer to nature. I think if additional facilities e.g. showers etc were put in it would destroy the atmosphere.
- Unable to use above boxes, but choice would be B, A, C, D, E. My family have enjoyed some special nights camping there and it will be a huge loss to Guildford, if it were to close to the public.
- Option B is preferred over all others by a wide margin.
- Option C should include Guides as well as Schools & Scouts.
- The rural nature of Chantry Woods and the area as a whole should be preserved hence, I have put Option E as No. 1. While I personally would prefer no campsite at all for the sake of our fast vanishing wildlife, no campsite would mean that the many DofE scouts on the North Downs Way might find it difficult to find somewhere else, hence I have put Option C as my No.2. The other three options would be detrimental to the peace and quiet of the existing area and would cause permanent environmental damage. Therefore, I favour a return to grassland and woodland for nature conservation. I also believe that there are more worthy projects in the Borough that would benefit from financial input that are more accessible by vehicle than the Chantry site.
- Not too sure what forest school is but I expect the charges would exempt the less well-off people of our community hence the lower position of Forest school use in my rankings.
- We have visited the Chantry Woods on numerous occasions with our family and now with the grandchildren. We have, in addition, camped there with the whole extended family this summer. It is a very special place with just the right amount of intervention from the Council with regard to facilities. Please do not upgrade the site with showers etc. The whole fun of camping is to be resourceful. It is not difficult to deal with loos etc. and ensures that the character of the site is preserved by not upgrading it too much. Children need to be allowed to explore, learn about risk-taking in a safe environment and enjoy the natural environment. This ticks all the boxes and the Council is helping in that by keeping the site open as it is.
- I am not sure of the need to encourage more vehicles/traffic to this area. It would be a big shame. Part of the charm of this campsite is that it is so basic.

- Strong preference for a basic upgrade of facilities. This is not a campsite for “destination holidays” but ought to be a place for Surrey families to take kids for short breaks to introduce them to camping. It’s not competing with Center Parcs!
- A basic campsite for scout groups is all that needs to be maintained.
- Option B - The charm of the site is the views and basic facilities. It would be terrible if this asset was lost to local people and visitors.
- It is a lovely campsite - it would be possible to charge more for it or work out a pricing structure for exclusive hire or for different groups. I am not sure it needs very ‘flash’ facilities an ‘eco’ campsite would work well.
- Keeping the campsite, the same but trying to make it more ECO friendly would be lovely to see, especially seeing as our world is in a state of climatic emergency. Compostable toilet facilities etc.
- A one-off cost of a cesspit is about £20K and will be in situ for decades require the occasional emptying. This would make the campsite more viable and require occasional emptying A cesspit will lead to more than one party to book at one time - more income generation charge for groups according to age. Provide heavily discounted fees for school/forest school groups or for free. Allow campervans/mobiles for the disabled/elderly so they, too, can enjoy this wonderful site in comfort - without discrimination.
- This form has an error because in the first sentence you have asked for a tick then under OP E you ask for a ranking. The toilets can be improved and increased in volume - many houses throughout Guildford have septic tanks - have you even looked into that option? I have recently moved into Guildford and like this campsite - forest schools are good fun but to lose a campsite forever to one would be crazy.
- Keep the campsite as it is - open to walk through.
- Eco toilets? Cold running water only. Clean and basic.
- I choose D, C, B, E, A -12345. Boxes not working on my phone.
- This is the only campsite and should be kept.
- This is an excellent facility to have on our doorstep. Please retain it for future generations.
- I really think it wrong that I have to pay the same for my baby as me. Why don’t you charge\ like normal campsites? I have stayed at lots with night soil toilets too - they’re perfectly fine. We camp at East Horsley a lot that is supposed to be Guildford’s campsite but a campsite closer to Guildford with all the mod cons would be great for tourism.
- This is a fantastic facility. It doesn’t need masses of modernisation. Kids enjoy it as it is. Let our kids enjoy the wild without squeaky clean facilities. This is a real camping experience. If you need to raise money why not crowdfund it every year. I’m sure people would chip in.

- This is a public area and should be available to all RESPONSIBLE people. This may, however, require police monitoring. I wonder how e.g. public use of Newlands Corner is monitored.
- Need to keep it open for dog walkers, riders and even cattle. Dogs are regularly walked up on the chancies.
- This is a beautiful unique facility that has helped make many happy memories. Please, please, please keep it open for camping.
- How about using off-grid technology to make the campsite more desirable to members of the public. That way you wouldn't need to run electricity and other services up to the campsite. It would also be another source of education and should not disturb the tranquillity.
- What about of the grid sources so the council doesn't have to pay as much?
- I know friends who have camped at the Chancies and the attraction is going back to basics. The benefit is getting back to nature for all who wish to camp there.
- The campsite is a useful resource for Surrey Schools in general, and I don't think it should be limited to a forest school.
- Keep it as it is. Great to have an accessible site like this, affordable, basic and offering an opportunity for locals to experience the great outdoors. Please keep it!
- The existing campsite is a relatively ECO option, the only reason I haven't used it is one of timing and opportunity. I believe it should be an amenity for the public, not just restricted to educational groups. I see no reason why it couldn't be refurbished to a moderate standard as Option D and yet include public camping. I often walk through the area and would not want to see this restricted.
- What a lovely site for people to use. GBC should be proud this is available to public. Do something right for the good of the locals.
- Now I know there is a local campsite, I'll take my children for a night!
- The field is one of a series of fields on the top of the North Downs Chancies, which are enjoyed by many walkers, including large numbers of local dog walkers. For the council to spend a lot of money on this field seems an inappropriate use of council funds, when I am sure there are much more important issues. Option A would alter the tranquillity adversely, and I think is totally unnecessary, as there are plenty of other commercial campsites around which fulfil the needs of those campers who want more facilities.
- The campsite should remain open for public use - it is a beautiful location and a valuable facility, however recognising the financial challenges I would support any investment that retains public access, but allows GBC to get a return.
- Although I don't camp here, I've passed through many times with my dog and it's lovely to see all kinds of groups using the site. It would be a great shame if the public could no longer access it.

- This spot is on a beautiful public right of way. Any restriction for that has to be opposed. As for the camping, we currently assist at two forest schools in Guildford, the option C implies only one would be using it. This simply is not good enough. Option E, wholly unacceptable, the site hardly makes an impact on this staggering area, to remove any facilities will not add to it. Option A would inevitably mean a busier site, more building and traffic. The peaceful nature of the site would go. I also volunteer at a Youth Club in Guildford and remember the site was used wholly for youth groups of various kinds. This should continue. My Youth Club members are some way from enjoying the great outdoors so far, but the option should remain open to us.
- I have walked through the campsite many times over the last 20 years and love to see it being used by families, schools and especially charities such as CHICKS. I understand the cost is/was £7 per person per night.
- It is well used by D of E and scout and guides so please ensure the campsite continues to be available.
- I also walk there everyday of the year. A limited access would be a disaster to me and my friends.
- It has been enjoyed by many over the years and I am sure many will do so in the future if allowed to do so.
- This is bonkers. Why can't the campsite be used by scouts, guides and members of the public AND a forest school over specific parts of the year? Is the site large enough that a forest school can operate on part of it permanently and the rest used by school, scouts, guides, the public etc? By leasing it to a forest school you are effectively making a public owned resource accessible only to those who can afford to attend the forest school. I'd strongly suggest that you also advertise it far more broadly - I doubt many know of its existence and it would be a brilliant resource for families who cannot afford to travel far or pay lots, giving them a break in nature which is proven to have benefits for mental health etc. I'm in two minds about keeping the facilities basic - on the one hand it ensures affordability to those on lower incomes, and I think there's something to be said for roughing it a bit - teaches children to be grateful for mod cons and to be resourceful - on the other hand...
- It would seem a shame to waste the current site. Have you seen if there is an external organisation that could help take it on? Embers? Surrey Adventure company etc?
- I would like to see the forest school option with at least some public access ideally. Perhaps it could be public access on some weekends or weeks of the year, particularly to coincide with school holidays, when presumably, school groups would not be using it. I would also like to know that the option for schools to take groups to the site would be widely promoted to local schools so that they could avail of the facility.
- I don't think this facility should be turned over to a forest school. By all means they could book it but it would discriminate against families, other schools and scouts etc.

- One of my children has camped at the Chantry's campsite with Holy Trinity School back in 2010. It was great the children could camp in Guildford after a circular school to Shere. The walk was at the end of term and was from Guildford to Shere, they called the walk the Trinity Trek. Unfortunately, since then in subsequent years, the trip has had to be revised. My other two children had to camp at Bentley Copse at the end of the walk, not as convenient for a Guildford School. Quite polluting for 90 parents to drive up those congested lanes to Shere to pick up their children. I think it would be great if the campsite would be used by local schools and Scouts. Could the facilities be updated to be on a par with Bentley Copse? I agree a campsite for the public could increase traffic and may not be a good idea for that reason, unless it was a 'green' campsite and could only be walked to. Maybe for people walking the Pilgrims Way or Downs Link path.
- I don't think the higher standard (A) means overall better outcome in terms of community and environment. It's a great place for public to enjoy and I believe it can also be reserved for schools and scouts if needed.
- This is an absolutely beautiful campsite and it would be an incredible shame if it was not to be available to the public in some way. I don't think anyone camping there needs a fully refurbished site, it is frankly absolutely perfect as it is, and I would think most campers would be happy to pay more for it as it is, allowing the council to make a small profit each year.
- I can't stress enough how important I think that this sort of simple undeveloped and cheap access to the countryside is for people's wellbeing and it is just the sort of thing a local council should be championing. I appreciate the pressure on finance but then I see money spent on unnecessary projects in other areas so my sympathy is tempered. I have also become extremely cynical about these consultations having concluded that they are exercises to make it look as if the local authority listens with there being no intention of changing a pre conceived plan. I hope I'm proved wrong this time.
- I have been walking the Chantry's and through the campsite for over 40 years. I like its tranquillity and the way it fits into the environment. I welcome the idea of a forest school assuming it really would still be open to school and other youth groups. But, as someone who has walked the North Downs Way camping on it, there is a dearth of places to camp. I did it without permission then, when I was with my son and couldn't find any. I expect people will still do that today, but it would be better to have somewhere official.
- I'm always surprised how underused such a lovely site is - even in the summer holidays. An increase in visitor numbers through greater local awareness could help reduce the ongoing costs anticipated in option B without the drawbacks of A.
- This campsite is a special place for the local community. We are so lucky to have the beauty of the Chantry's in our town, and being able to camp in our local woods gives a sense of belonging to this special piece of land. This is also a local space for people to get together. It is not just about camping. I firmly believe it should remain as a basic campsite. It is not clear where the view has come from that it should be developed into a commercial campsite with showers and electricity. It seems to me it is more about an experience of being in local nature that is the value of this precious space, plus a local place for people to come together to celebrate. Showers are not necessary for these mostly one-night stays. The conservation work that goes into the chantries is much appreciated, but probably never gets voiced. It is not clear to me how the campsite currently costs £5,000 a year to run. I would like to see the accounts details to determine what this money is being spent on.

- Keep it for public use. There are few enough public camps sites as is.
- Keep it open for the public use, but by all means take bookings for forest schools too- why not? We pay for it in our rates, but GBC and SCC seem hell bent on commercialising everything, these sites are not actually yours to do this with, they are held in trust by the council on behalf of the tax/ rate paying public.
- I think options D and E are terrible.
- GBC are supposed to serve their public, the ones that pay their Council Tax to enable the council to supply services to the people of Guildford...So GBC serve your public. Or do what all public service bodies do, do what you want and blow everyone else!!!!!!!!!!!!!!
- I think we should be mindful of a low carbon footprint and keep the campsite as it is. If a toilet block could be added at a minimal cost then I would support that. I think this should remain a local campsite for local people and visitors.
- The campsite is fine as it is. There is no need to change it. However, the campsite should be better publicised. Most local people aren't aware of it, which is a shame. If the cost of running the campsite is an issue, why not just charge a flat £50 per night for the campsite, raising to £75 during the summer months, and £100 for summer weekend nights? This would likely raise more money the current pricing model.
- Make the booking service online with immediate booking options. Offer small fire pits for rent but keep the option of allowing campers to bring their own. Sell bags of logs at £5 a bag like other wild camping sites with a couple of fire lights.
- This is a beautiful spot for the public to use. The council is, after all supposed to serve it's public, it would be a great shame to give it to a Forest school. Not much point refurbishing for such a small revenue and huge costs and tree removal.
- It should remain open to public with simple update in sanitation.
- There are no public camping facilities elsewhere in the Guildford area. Although we have been unsuccessful so far at booking a night at the Chantries site, we are still excited about being able to spend a night under canvas close to home with an almost wild camping experience.
- I was a scout for all my childhood and I'd tend towards leaving nature to be as close to nature as possible - rustic campsites are beautiful and inspirational. Too much of our world is 'managed' and subject to too much health and safety restrictions.
- The area is such a benefit to the school it would be such a shame to no longer be able to use it. The children gain so much from being able to go there.
- Do nothing to increase the footprint of the site. The site is small and to justify such a radical change it would have to enlarge. The council should look at the environmental impact of upgrading the site to commercial standards. The primary use of this area is for walkers rather than campers and the site needs to be seen in that context.
- I would pay more for better facilities.

- Please leave the campsite for everyone to use as they have done without issue for years.
- Clean up the toilets by all means, but otherwise leave the place alone. Please stop harming our countryside by building on it. Leave our countryside alone.
- I am a local resident who walks through the campsite daily. It is in an AONB and provides a beauty spot and view for all visitors and members of the public. I believe that it should be returned to its natural state for everyone to enjoy rather than becoming a commercial enterprise for the council. If it is refurbished to be used by a forest school it will alter the character of the area irrevocably. Please do not do this - we have precious little natural woodland as it is and we need to preserve it for future generations.
- The area must continue to be open to members of the public. So many dog walkers and other users enjoy the chancies on a daily basis.
- This should be available to all.
- We need more spaces like these but they don't have to be gold plated.
- Although I've never personally used this campsite, I do think that given the view that we should encourage children and families to make more use of the countryside, it would be a loss for this amenity to be lost. Many children never experience the great outdoors and instead of restricting use of the campsite why not use a small amount of public funds to actually publicise this amenity rather than just lose or restrict it? Also, why does it have to be a forest school only, why can't a forest school and public use be shared? I'm sure most of the public would use it at the weekend when forest school wouldn't thereby introducing two funding streams for the council.
- My children and I have camped at Chantry Woods campsite 1-2 times/year for the last 3 years (age range of children during stays 6 to 10), as part of a party of fellow parents and children from the same year group at our school. Every year when asked they reply an instant 'yes!' to the prospect of a long weekend stay at the site. When surrounded by all the comforts of home, you could ask why? The simple answer is that it's fun! A beautiful location, with woods to explore with their friends, grounds to roam, dens to build, trees to climb, night explorations with head torches, fires to make, sausages to cook over the fire, marshmallows to toast, and bacon sandwiches for breakfast. Every time, whatever the weather, both return home in need of a wash but with many happy memories. They are not concerned (and neither am I) about the chemical toilet facilities or 2 cold water taps. In addition to the memories, these weekends away in this beautiful environment with basic facilities.
- The site must remain an amenity available to all. Options C, D, E are absolutely unacceptable.
- Please keep as is and safe current set up.
- The campsite is fantastic - to limit its use to a forest school or for schools and scouts only, and by encouraging regular large groups could be harmful for the natural environment and would be limiting for those outside those groups. Its current sporadic usage allows the area to be enjoyed by all with nature not disproportionately affected by campers. This is an area regularly used by walkers, runners, young and old and should be kept so that all can use it.

- Out of 5 options only 2 allow for public camping! Why? Although it's great to ensure young people, scouts, schools etc get to experience camping in such a lovely place why make it exclusive to such a small section of the community- whilst also minimising the overall utilisation of the site.
- Whatever the decision this area should be open for access to the general public. I, like many people, walk through the campsite several times a week. The reason I put I have never "used" it is because I have never camped there. Both my children did when at school. I think it completely inappropriate to do anything other than a basic refurb of the current facility as necessary. We all appreciate a water source particularly in the summer. Any cost can be offset by an increase of hire charge. Definitely not upgrade to showers and other amenities. This is a precious area of natural beauty enjoyed by many. Forests schools etc. would create health and safety issues and the inevitable building and potentially limit the access to the public.
- Please don't change it, if you do you will break it and ruin it. Its basic but it works. If you provide shiny facilities some miscreants will burn it down and then you will close the site. Leave it as is please.
- The site is an integral part of the Chantries and further development and in particular commercialisation of the site which is enjoyed by a wide spectrum of local and non-local residents should be avoided at all costs.
- Please, please don't change the nature of this beautiful peaceful place enjoyed by so many people. A small refurb is absolutely sufficient and you can charge a little more per person. Please don't add a car park, lighting, buildings, access roads etc. Keep it as it is! There is so little provision for family basic wild camping available.
- The campsite is a special asset and it needs to be protected. Additional facilities are not required. Our children would not have enjoyed their camping holidays there (which they LOVE any more for the addition of electricity etc. The charm of the site is the 'back to nature' feel and the safe environment for kids to play on the field and in the woods. Plus, the camp fire of course! Members of the community have made their views clear and I wholeheartedly support the messages being shared. We believe that the payment for the site requires more careful thought. You currently charge the same for adults, children and babies; commercial groups and school groups; whether it's August or January; whether you have just one person taking up the whole field or one hundred people; whether it's a 2h lunchtime birthday party or an overnight stay; etc. The current model is not fit for purpose, and increasing the £ pp/pn number without making any changes to the pricing structure does not solve it.
- Given the very few campsites in the area I am amazed that the council can't or won't make money from it as it is and wants to give the campsite up to a private operator. Have you spoken to the Basingstoke Canal about how popular their campsite is?? In the last 5 years I have tried on 3 occasions to book it for group use and always it has been fully booked.
- I think the costs seem excessive and profits low. During weekends in the summer pitches could be sold for a good price with a communal fire pit. It would be a wonderful way for the local community to come together.

- I feel strongly that it needs only basic facilities - it is the joy of being close to nature that will benefit young people in particular.
- The current campsite is a huge benefit to local groups who have been using it for many years. It would be very sad to see an area of outstanding natural beauty turned into a private business that would have different priorities and not be accessible for everybody (this is based on prices charged).
- I feel that there are hardly any facilities like these in the borough and it's important to keep them running. I will help if I can. I run a local therapy garden and am fully DBS checked. Call me on 07464068671.
- Essential to ensure preservation of the natural environment. All too few of these basic campsites left.
- Leave as is. Great location. Basic but that is also the appeal of the place as close to nature.
- Option A sounds like it would destroy/disturb/disrupt the current habitat to an unacceptable level and it would be a shame to do this to an area of natural beauty. This most disturbing element of the other options C and D is that these options are promoting exclusive use and as such promoting a very non-inclusive solution. This would be not be in keeping with good relations within the local community. £5,000 for option B is a small price to pay compared to other much larger borough spending.
- The best option is to continue with a basic, no-frills camping experience and so I would prefer options C or B. The supporting info for each option is not clear but I would prefer B if it meant more people used it, and therefore it cost less in subsidy. Option A should be rejected out of hand as it detracts from the current offer and delivers an appalling return on investment. If the numbers given are correct, this option has a negative NPV. Option D is effectively privatisation of this public space. It benefits a private company at the cost of the experience available to council tax payers.
- It would be a huge loss to lose public access to the campsite.
- This is a wonderful site much loved by the community. To go and have a picnic in the Surrey Hills is a very special thing and in winter this is the only place where fires can be lit. As a family we love it and would happily pay for the use of the firepits. We have many happy memories here; it is particularly special for family friends who don't normally socialise in groups due to autistic family members, who feel the space here allows interaction and solitude when necessary. There is just about access for the disabled which is wonderful as most places in the Surrey Hills are inaccessible. We would very much like to keep this space for community use, whether it is used for camping is neither here nor there. The flat space allows for games to be played and children to safely explore.
- Only Option B is recommended. The other options are exclusive and Option A would ruin the whole nature of the area.

- This is a beautiful spot which provides public open access in particular for dog walkers/families etc. which should be kept as open space for all to enjoy. It is wonderful that families can picnic freely or even BBQ. I don't believe it should be used as a so-called forest school as I would be concerned/fearful that it would be 'developed' in some way. Access to the Chantry is via a very busy narrow lane and I would fear more traffic, and it is pretty dangerous for pedestrians walking from St. Martha's car park to the Chantry.
- Take a massive asset for the future and should be brought up to date asap so that existing walkers and future campers can enjoy the countryside. I've noticed over recent years the decline of the site. I thought surely this should be looked after for many future generations who will only get to camp out in sites like these. Life is becoming so predictable with all this cost cutting until in the end there will be nothing for anybody unless you're really wealthy and can afford to have holidays abroad 2 or 3 times a year.
- It is vital that this be retained as a campsite to encourage people to reconnect with our environment and help them to understand how important these wonderful open spaces are - not only for the wildlife but for people too. Being outside has been shown in many studies to improve people's mind and body so any facilities which help people gain the experience of being at one with nature is to be applauded. Starting with young people has to be a good way forward. Whilst I would like the general public to still be able to use the site, I cannot see the necessity to refurbish and make it a plush place to be. Wild camping is a thing in itself - getting back to basics is something to be enjoyed. It would be a pity to exclude the general public - could it not be used by the public when the forest school is not using it???? That would enable the council to get more money in. Why restrict it to one option or the other? It is currently used by both.
- This is a valuable asset which should be maintained as a basic campsite for all to use. A more creative fee structure should be used to generate more revenue and greater usage. Current charges are too low per head for camping but if a large group is using the site it may be prohibitive. Consider a minimum and a maximum charge for site use. Consider different fee structure for young people's organisations vs private/corporate users.
- It would be nice to have improved facilities, that would allow members of the public to use it as a single group booking.
- Keep the site as close to nature as possible.
- I think in this day of busy people and refinement it is essential to have a facility for schools and guides/scouts to use in Guildford. I walk my dog weekly passed the campsite and witness young people having a marvellous wild experience. Lots of family groups seem to book the site too. We are very lucky to have this site and it must be protected and refurbished.
- Rough camping is rough camping, that is how it should be. No fun otherwise.
- None.

- Why is there no option to improve the facilities in a limited way to allow multiple group use at a lower cost than £300,000, there seems to be an all or nothing approach. Surely a simple block with flushing toilets would be all that is required to allow multiple simultaneous group use. The limitation at present is that booking the site has to be done months in advance due to popularity during the months when camping is attractive. Surely a lower investment with a slightly higher booking fee and the potential for increased utilisation would benefit both users and the council's finances?
- This is a beautiful area, keep it beautiful and no more infrastructure or building is needed.
- I would much prefer the facilities to remain low key, although some basic improvements would be a good idea. I walk my dog there at least 3 times a week so would not support anything that changed my enjoyment of such a lovely area. I am very supportive of the educational aspects of option B and fully believe in creating an opportunity for the younger generations to experience the joys of nature and benefits to wellbeing that it brings.
- Use for housing rather than green belt?
- The current site could do with some very modest tidying, but should be essentially maintained as it is. The costing estimate of £300k seems excessive and prohibitive and should not be pursued. The council should share the working behind this figure.
- It cannot just be about money. It is also about community and providing facilities for locals, families and young people. Please do not deprive us of another local facility which takes us away from busy and digital lives.
- I walk through the campsite every day. The vast majority of people using the area are walkers and dog walkers, of which there are many. In my view this area of land should be treated as the adjoining open areas in the Chantries - as a marvellous site to enjoy the Surrey Hills. It's one of the delights of the area and I see the campsite as a minor consideration.
- No.
- Only recently aware, but our family are camping fans and we would like to use it.
- The forest school option would benefit so many children. My only concern is parking - the car park at St Martha's is often quite busy already.
- Should have reduced rates for children. Install cesspit if there isn't one there and have flushing toilets. Take in more than 1 group. Local schools have been using the site for forest school days, let that continue.
- Camping doesn't require 'modern facilities'. That's the essence of camping- back to basics! If more visitors are needed to increase income then promote the site - Facebook etc. I am sure few people are aware of the wonderful opportunities to camp there.
- The location of the campsite is not suitable for a commercial campsite - the peace and quiet of the area and lack of easy access (single lane road) and lack of parking all mean development would be inappropriate.

- I would be concerned that creating access would cause damage to a sensitive bluebell wood, as would the increased traffic through the wood. A public campsite would change the nature of the area and could encourage further development.
- There has been a huge rise in camping & glamping in the last few years. This is a beautiful spot which if looked after & advertised would do very well bring close to London the coast & an area of outstanding natural beauty, there are already a number of scouts only campsites in the area & nothing for public use. I have in the past looked into staying at the campsite but It was very difficult.
- Public use, no other option in my opinion is welcome.
- It would be a real shame to not have the campsite available to the public.
- Please do not commercialise the best area in Guildford which is a natural environment. Changing the use of this area will not improve its use, please don't look at this merely from a financial aspect.
- My family have used the chantries between the 70's and the 90's. They run scout camps for Bellfield's cubs and a deaf children's camp. It would be a shame to lose the place but the facilities do need upgrading. It would encourage others to use it more often.
- This is a poor survey.
- Keep it basic, like a mountain bothy for public use including scouting fraternity. Presume there is a booking system?
- I used the campsite as a girl guide. We need this sort of facility to stop children being so dependent on IT games and social media.
- Please keep it open.
- I really object to needless changes when something is working already. It's a simple, low tech, low-fi, beauty spot which should be kept for the local community. That means people living in Guildford or surrounding villages, or local schools and local groups. Upgrading with showers, toilets and facilities will simply SPOIL this beauty spot by over-development and over use, building structures, increasing visitors, increasing noise and disturbance. I have used the campsite several times, but I also walk through the campsite at least once a week with my dogs. I always see other walkers passing over this land. It's so calm and peaceful with a wonderful view. Please, please just leave things alone. Less is often more in this day. Under development rather than over-development!
- Keep it as it is. Advertise it better and charge enough to cover costs or make a small profit. Clearly state that any profit goes straight back into the campsite. Lots of local groups could use the space and if managed well, the events they hold could help fund the space. It is a unique space, 30 miles from central London and is under-utilised and not very well known. Is a town council the best organisation to be responsible for utilising such a great space?
- Why can't the area be shared for public use and forest school?

- I believe that continued provision of such facilities to schools and scouts is essential. I personally benefited greatly from such facilities in my youth.
- I would pay more money per night if the facilities were updated.
- It is public land so should be open to public! Having visited the campsite for over fifty years since a child would not want it closed to the public. The beauty of it is it is basic! I suspect the majority of groups are children and young people anyway! Whatever option public access for walkers etc to be maintained.
- I am 50 years old, not used it for years but had some great times as a scout in the 80's there, be a shame to lose it, you seem to charge us more every year for council tax but we get less services each year and it's disgusting.
- The campsite has been a part of the amenities available to the people of Guildford for decades giving many children and young people the opportunity to enjoy the outstanding natural beauty of the Surrey Hills. In my opinion the cost to the tax payer is a very small and therefore the campsite must be maintained and made available to as many groups as possible.
- If there are 1,400 visitors per year, paying £4.75 each, and it costs the Council £5,000 pa to run, the campsite is more than paying for itself. Why does it need a subsidy? What are the repairs costing £36,000? Could some of these be carried out by local volunteers? It's local people who treasure this simple site as it is. Could the council work with them to make the necessary repairs?
- Used to camp there with the scouts. Important to keep the availability for the youth to get out into nature.
- I think with deforestation it's important for the youths (our future) to embrace nature and what better way than being surrounded by it.
- Use by a forest school plus use by scouts etc. AND the public campers at other times seems to be the obvious answer that would please all interested parties! The preferred solution will have to be explained clearly and ask for feedback to avoid troublesome rumours from residents. The rumours have not been helped by rather unclear communication so far. Also, perhaps the forest school would be willing to provide the booking system.
- Although the survey asked about use of the campsite in the last 5 years, I'd like to point out that many of used this site many times in our youth, our children used it, and although we haven't used it in the last 5 years, we do understand what value it is to the community, and value what it gave us years ago!
- Please keep it open and accessible to as many parties, individuals and organised groups alike It's part of any young, then older, person's heritage, when living in Guildford.
- Although I have not personally used it, our children have and loved it. Let's hope lots more children in the community get the opportunity to do so also.
- I believe any form of camping should be available to all members of the public but especially to the younger generation. In this age of inactivity and obesity any outdoor activities should be encouraged and made achievable.

- In the current financial and environmental climate, I don't think option A makes any sense. From growing up using the campsite, option D sounds like a fantastic option :)
- Please let's not turn this into a mass public campsite. It should remain natural and as wild as possible with limited numbers allowed each year. Over recent years it has become more and more popular and it is losing its appeal. I would strongly recommend increasing the price per night and limiting the numbers allowed per night and per year and keeping it wild, this is the most appealing aspect.
- This is an AONB and in terms of climate change we need to protect these woods as much as possible. Less human interference at night and all day (as with camping) would be better. Forest schools already access the woods quite successfully and they do not need this site.
- I would like to see the breakdown for £36,000 worth of repairs please. Can you make this document public? If people want to go to a campsite with hot and cold running water, car parking, electricity and plumbed in lavatories then they should go somewhere else. There is nearly nowhere left where people can just enjoy life and nature and leave no carbon footprint.
- This campsite is a fabulous facility - over and beyond camping. We've gathered friends there informally for wide games (when no-one is camping) and we regularly walk our dog (up to five times a week) in this site. It's a beautiful clearing and so well placed but we'd hate to be shut out of it in any way. Our main priority would be to maintain open access, but we also see that a little more publicity could see the site booked more often which would be lovely. I have no doubt that the beauty of this spot keeps walkers coming and we are proud of it - and thankful to the council for operating it!
- I do not want this site to become a mainstream camping provision at all.
- Local resident for 17 years and have lived in/around Guildford since 1991. This area is used daily by dog-walkers as well as families, walking groups etc. Access must be preserved to this area for local tax-paying residents: privatising this area (Option D Forest school) and "limiting numbers" does not appear to preserve the area for public use nor for local residents. The existing toilet blocks are an eye-sore: they should be removed (Option E No campsite) or updated in keeping with the rural surroundings (Option A Refurbished campsite). The Hall has recently had the roof repaired. Campsite bookings would increase if shower/toilet facilities were updated: increased visitors would increase revenue for local leisure/ entertainment providers e.g. pubs, restaurants, cafes, High street shops, YA Theatre, Guildford Spectrum, G Live.
- I have walked over the hills since I was very young. If you are thinking of going for option. With trees being cut and more traffic. I don't agree with that. I wouldn't like it. So, everyone can enjoy it.
- My children use the facilities via scouts organised events. I feel it would be a massive loss to the area and these groups may also be under threat if the council were to permanently close sites like this.

- We have spoken to families using this when we have been out walking. Some come here year after year. It is a beautiful area to camp and give children a safe experience of camping. Toilets and running water are a real bonus and make it usable by families. Please keep this available to all.
- To me option 1 seems to be over the top, and in the present climate the money it will take to achieve this could be better used elsewhere. Personally, only proper toilets and wash facilities, along with cold water for washing and cooking are all that is required, and hot water can be produced by using fires rather than potentially wasting energy storing hot water in a tank. Approx. a year ago I started walking in and around Chantry Wood during my lunch hour, and to me it is an extremely valuable place to walk and spend time there. Partly due to nature and how it changes during the seasons, with the bluebells and other flowers in Spring, to the cyclamen flowering in Autumn, along with the open space where the campsite is and the wonderful views into the distance. Having this amazing green space on the edge of a busy and built up town it is an escape from the noise, pollution and the busyness of life is extremely important.
- Option A would represent an extremely poor return on the capital investment (0.83% p.a.) and even that is uncertain. It would also have a negative impact on the environment in that area. So, this seems to be the worst idea presented. Option D would presumably require a lot of transport movements to bring young children to the “forest school” and take them home again on the same day. This does not seem a good idea from an environmental perspective, which should be important in this sensitive location, or in view of the narrow lane access to this part of Chantry Woods. There must be more appropriate locations for forest school activities, even elsewhere in Chantry Woods. Option C is my preferred choice as there must be a considerable demand for a site of this type with all of the Duke of Edinburgh’s Award Scheme groups doing their expeditions and training in this area. It would be unfortunate to close it altogether, and these groups should have the experience of using basic services.
- I would like to ask whether scout, guide and schools have been asked what their opinions are? I think it is imperative for as many children as possible and from diverse backgrounds should have the opportunity to use the campsite, especially as so many children who do not have enough exercise or outdoor play. For some children it is their only holiday and time away from possibly a difficult home or school life. Have the council approached any local businesses to help fund the necessary refurbishments? Could local voluntary groups help with the works? I understand the council’s resources are limited but by looking elsewhere for support might be an option? I camped as a guide and still remember how much I enjoyed myself and how many skills I learnt. I wonder whether the site really needs showers etc? We just had one running cold tap and managed for the week?
- maryho21@outlook.com. The campsite would have to be made fairly secure, or it could be invaded by groups of rough sleepers/homeless people, and therefore not be able to fulfil its main purpose. I am not unsympathetic to the homeless, but a secluded site like this could be left in a messy state (speaking from experience).
- It is a lovely campsite which I have often wanted to use but it has been booked by other groups when I have wanted to use it. I love the fact that the facilities are basic- that is part of the charm. Please keep it basic for all people who love the outdoors.

- If a public campsite is decided on where would the public park their cars, and the lane, being single is already hazardous.
- It's a public space and I feel that it's important to keep it this way. I do not want this area to be privatised.
- No.
- I am concerned about there being any development in this special natural area. The less facilities that are provided the better. I feel there are other locations which would be less impacted by the provision facilities. This area is currently enjoyed by a lot of walkers who massively value it as a natural area.
- Option A would spoil the campsite and woods, and constitutes a far too intensive use of the area which was never intended by the people that originally acquired the land for public use. Please leave this incredibly beautiful and peaceful area alone (as existing - basic campsite or remove the campsite altogether). I visit the woods three times a week, every week, to walk and I pass through the campsite. It is a peaceful spot to admire the view and should not be developed further. Please do not develop the site further. Please leave the site as it is.
- I have been walking in the Chantry Woods for most of my life as a child with my family and now at least three times a week with my dogs. The area is not large and is not sustainable for an increase in traffic or lots of people. The forest/woods will suffer if a bigger infrastructure is built. The Bluebell woods should be protected!! The Wildlife should be protected. It is the proximity of the beautiful countryside to Guildford Town Centre and our homes is what makes Guildford so special. The future of these beautiful woods should be preserved for the next generations. Commercial enterprise should not be a consideration in this matter. If the bottom line is purely monetary than the campsite should be returned to open grassland and managed accordingly with the Chantry Woods as a whole. PRESERVATION OF CHANTRY WOOD IS PARAMOUNT. I ask that the Council seek Expert Advice in this matter as well as listen to the public. Avoid hugely expensive mistakes.
- Retain the campsite and continue access for all. Subsidising facilities for community benefit are an important role for the council not an admission of failure.
- I am responding on behalf of Holy Trinity Amenity Group. The site is a much-valued part of the Chantries. Some of our members use it for camping, and many more frequently pass through it when taking a walk from our homes (no car travel involved). Over the years we have had involvement with its future. We wish it to remain a mainly natural area that can be enjoyed by all, with only basic facilities for camping which should be primarily for the general public, and Guildford residents in particular. This pro-forma consultation is not helpful. We hope that the submissions and correspondence we have previously made, which remain relevant, will continue to be considered.
- Whilst it would be unlikely to become Piccadilly Circus the campsite should be able to be accessed by all. £300,000 is nothing in the grand scheme of things. I also think it possible to hold some fund-raising events to help with some cost. it is a wonderful resource. The open nature is wonderful and the views are stunning. I enjoy walking through the area with my dogs. It would be a tragedy to allow it to become under used and a victim of the bracken invasion that happens every time a tree is removed.

- Not well-enough used. I walk my dog there about twice a week and it is so rarely used. I don't think it would be well-used as a public site, so not worth the investment. Forest school use is a good idea.
- There is no need whatsoever to spend £300,000. The pleasure experienced by any campers is the basic nature of the site. The forest school deal is far too restrictive and exclusive, it would be preferable for the public to be able to enjoy the space even if they can't camp rather than have a forest school take it over. Rethink this whole proposal and listen to what people are saying.
- The campsite is such a good resource for public groups. We used it several times for Woodcraft Folk summer camp. Doesn't need significant upgrade for this purpose except for better water/tap and better track/access.

Executive Report

Ward(s) affected: Christchurch

Report of Service Delivery Director

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Date: 24 March 2020

Burchatts Farm Barn car park, Stoke Park

Executive Summary

This report is to agree capital for Stoke Park's Burchatts Farm Barn car park for surfacing works. The funding for the new car park is part of the provisional programme (*Parks and Countryside - repairs and renewal of paths, roads and car parks*), forming part of the Council's General Fund Capital Programme and has been considered and included in the Council's borrowing requirements. This report requests approval for £280,000 of this provisional capital so that the necessary funds to carry out the work to surface the car park are available for the project.

Burchatts Farm Barn car park is the only car park serving the park that is not hard surfaced. There are no bays for parking and cars currently park randomly, often blocking cars into spaces. The car park serves several tenants and Stoke Park visitors, including events that are held on the park. It is covered by a parking order (TRO) that cannot be enforced until the car park has line marked parking spaces. The proposed surfacing material has been chosen as it is Sustainable Drainage Systems (SUDS) approved and will be an attractive surface for the surrounding buildings and parkland.

Recommendation to Executive

That the transfer of £280,000 from the provisional to the approved capital programme, to enable the surfacing of Burchatts Farm Barn car park, be approved.

Reason for Recommendation:

To enable completion of the project.

Is the report (or part of it) exempt from publication?

Yes, part (Appendix 3 – estimated costs of the project)

- (a) The content in Appendix 3 is to be treated as exempt from the Access to Information publication rules because it sets out the detail of the estimated cost of the scheme, disclosure of which may adversely affect the tendering process so that competition is undermined. This is deemed to be information exempt from publication by virtue of paragraph 3 of Part 1 of Schedule 12A to the Local Government Act 1972, which is "Information relating to the financial or business affairs of any particular person (including the authority holding that information)".
- (b) The content is restricted to all councillors.
- (c) The exempt information will be available for public inspection following completion of the

procurement process.

- (d) The decision to maintain the exemption may be challenged by any person at the point at which the Executive is invited to pass a resolution to exclude the public from the meeting to consider the exempt information.

1. Purpose of Report

- 1.1 To ask the Executive to approve the transfer of £280,000 from the provisional to the approved capital programme for the purpose of surfacing Burchatts Farm Barn car park.

2. Strategic Priorities

- 2.1 Surfacing the car park will improve the access to the park and the park buildings as well as improving the appearance of the car park. It will create line marked bays with four hours of free parking. The improvement to the car park will contribute to the Council's 'Community' theme within its Corporate Plan (2018-2023), supporting the priority of 'enhancing sporting, cultural, community and recreational facilities'.

3. Background

- 3.1 Burchatts Farm Barn car park is one of four car parks that are located on Stoke Park, off London Road in Guildford town centre. It is the only unsurfaced car park serving Stoke Park.
- 3.2 Guildford Borough Council owns all the land and buildings around the car park, falling within GBC's title No: SY743643.
- 3.3 The car park is designated as part of the protected open space forming Stoke Park.
- 3.4 There is a right of way that runs along the tarmac access lane, turning in a westerly direction across the park.
- 3.5 Burchatts Farm Barn car park serves the following buildings/tenants with two tenants holding a right to park within the car park (but not overnight):
- Urban Saints (tenant has right of way with or without vehicles over the track together with a right to park in the car park)
 - Disability Challengers (tenant has a right of way with or without vehicles over the track within the car park together with a right to park in the car park)
 - Guildford Model Engineering Society (tenant has rights of way over the roadway within the car park)
 - Burchatts Farm Barn (grade II listed) and flat has one parking space for the flat and five for the barn (lease/s will also contain rights of way over the roadway)
 - Old Guildfordians Club (tenant has a right of way over the roadway and two sections of car park demised to their use either side of the building within their lease)
 - Parks and Leisure Services sports pitch changing rooms and public toilets.

- 3.6 The current surface is similar to type 1 MOT subbase with a tarmac access road through the middle.
- 3.7 The existing tarmac access road through the parking area will remain. Where the MOT type 1 sub-base is, 450mm of this will be removed and replaced with permeable concrete block pavers (the parking bays) in a colour that complements the grade II listed Burchatts Farm Barn overlooking it. The block paving for the defined car parking spaces will be laid on a type 3 sub-base and a void ratio to allow storage and flow of water from the block paving. This surface choice has been approved by the Council's Conservation Officer. The access road through the car park will remain of a tarmac construction.
- 3.8 The proposed car park surface design is Sustainable Drainage Systems (SUDS) approved. SUDS provide areas within the built environment for the natural processes of rainwater interception to take place, offering a more sustainable approach to the management of urban storm water run-off than impermeable surfaces.
- 3.9 We have considered surfacing the car park with black tarmac, but this option has been dismissed because:
- a) covering the whole car park in black tarmac would be unsympathetic to the grade II listed Burchatts Farm Barn located in the car park. A Grade II building is "of special interest" and is protected with planning restrictions to ensure the historic significance of the building is not damaged. In addition, the car park sits within the park's protected open space designation, which is a restriction that requires sensitivity to the character of the park and any development upon it;
 - b) a surface of porous tarmac over the whole car park, whilst being a sustainable drainage surface, has been estimated as only £1,084 less expensive than our proposal to use block pavers for the parking areas, which will be considerably more in keeping with the surroundings;
 - c) a non-porous surface of tarmac is estimated to be £16,953 less expensive than our proposal, but it would not be SUDS approved. It would be an increase in hard impervious surfaces that will rapidly remove water from the immediate environment, preventing cooling by evaporation and channelling rainwater run-off into the park, where the ground may already be sodden, increasing the risk of flooding on the park and pitches;
 - d) dark materials absorb solar radiation and buildings prevent the heat escaping. Therefore, a tarmac surfaced car park will not mitigate against Urban Heat Island (UHI) effects or offer any climate change adaptation.

In summary, the block paving estimated cost is not significantly more than porous tarmac and would be a much more aesthetically attractive option, in keeping with the area, and will slow down the water discharge off the site using a SUDS approved drainage system. A non-porous surface over such a large area could lead to flooding on the park and is not a sustainable solution.

- 3.10 The plan of the proposed car park (annexe 2) shows that 35 car parking spaces, 5 minibus and 3 disabled parking bays would be accommodated in the new car park. Five of these are directly in front of Burchatts Farm Barn and could be allocated to any future tenant, if required. There are also three cycle stands.

- 3.11 The total marked bays of 43 is likely to be a reduction to the number of cars able to park at Burchatts Farm Barn car park. This is because the current users park where any space is available, double parking and blocking each other in. The new line marked bays require clear access for each car to manoeuvre and this also allows Parking Services to enforce the Parking Order. It is therefore likely that less cars will be able park than currently.
- 3.12 The Old Guildfordians lease requires the tenant to maintain their part of the car park and therefore this will not be included in the surfacing plan. To do so would increase the cost by an estimate of around £129,000.
- 3.13 Old Guildfordians have advised the Council that they do not wish to contribute to the cost of surfacing works to enable their leased area to be included in the plan.
- 3.14 The Council's engineers have provided a cost for the works, but the scheme will need to be tendered or procured through a framework agreement that will confirm the final cost.
- 3.15 The works are likely to take place during financial year 2020-21, during the autumn or winter. This will avoid the peak summer season when the paddling pool and Lido swimming pool are open and the car parks around the park are in high demand.
- 3.16 The construction work is estimated to take 13 weeks.
- 3.17 The construction work will cause disruption for the users of the car park, in particular organisations whose staff are parking there every day. During the work, sections of the car park will close to all vehicles and pedestrians. However, the work will be phased. The contractor will work on 25% of the car park at any one time, leaving most of the remainder still usable for parking and pedestrian access.
- 3.18 The nearest alternative car park is Guildford College during college holidays. Alternatively, parking is available at Nightingale Road and Lido Road. Both cost £7 to £9 to park all day. If it is necessary for tenants to park at these car parks during construction of the car park, a reasonable number of temporary permits will be offered to tenants.

4. Consultations

- 4.1 The tenants around the car park will be consulted about the start date for the surfacing works with the view of accommodating their requirements where possible. However, it will be impossible to find a date that will not cause some disruption to the tenants' current parking routine.

5. Equality and Diversity Implications

- 5.1 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 from this report.
- 5.2 The new surface will create disabled car parking bays that currently the car park does not offer, along with minibus spaces to serve the tenants needs on site.

6. Financial Implications

- 6.1 £1.645 million for *Parks and Countryside - repairs and renewal of paths, roads and car parks* (ref PL57) is available within the provisional capital programme to 2025 and

forms part of the Council's General Fund Capital Programme. This report requests approval for £280,000 of this provisional capital to carry out the work to surface the car park.

7. Legal Implications

- 7.1 The Local Plan provides Stoke Park with Protected Open Space status. In these areas, development will only be permitted where it complements their existing role and character as public open spaces.
- 7.2 The proposed change in surfacing would be a 'material change' as far as planning is concerned. As the Council owns Burchatts Farm Barn, the change of surfacing would be likely to fall within the allowances of Part 12 Class A of the General Permitted Development Order (2015, as amended) and thus would not need planning consent.
- 7.3 The Surrey Act lays down some restrictions relating to the area of Stoke Park that may be allocated to parking. The surfacing work will not extend the car park or provide any new parking spaces that do not already exist.

'In the interests of persons resorting to any park, pleasure ground or open space under their management and control, a local authority may set apart an area (not exceeding the prescribed area) of the park, pleasure ground or open space for use for the parking of vehicles and provide parking places and facilities in connection therewith.' (The Surrey Act 1985 Chapter iii)

- 7.4 The Council's Procurement Procedure Rules will be adhered to for procurement of a contractor to carry out the works to the car park.

8. Human Resource Implications

- 8.1 The car park is currently maintained by Parks and Leisure Services and the new surface will not affect staff resources.
- 8.2 Following completion of the line marking, Parking Services will commence enforcement of the parking order through regular visits to the car park, which will be an additional resource requirement.

9. Summary of Options

- 9.1 Option 1 - refuse approval to transfer £280,000 from the provisional to the approved capital programme. The car park stays unsurfaced and the parking order unenforced.

Option 2 - approve the transfer of £280,000 from the provisional to the approved capital programme. Officers will proceed with procuring the necessary work to surface the car park with block pavers for the parking areas and retaining the tarmac for the road through the car park.

10. Conclusion

- 10.1 Officers recommend that the Executive approves the transfer of £280,000 from the provisional to the approved capital programme to surface Burchatts Farm Barn car park.

11. Background Papers

None

12. Appendices

Appendix 1: aerial view of the car park with right of way location and photograph of the existing surface

Appendix 2: proposed layout for Burchatts Farm Barn car park

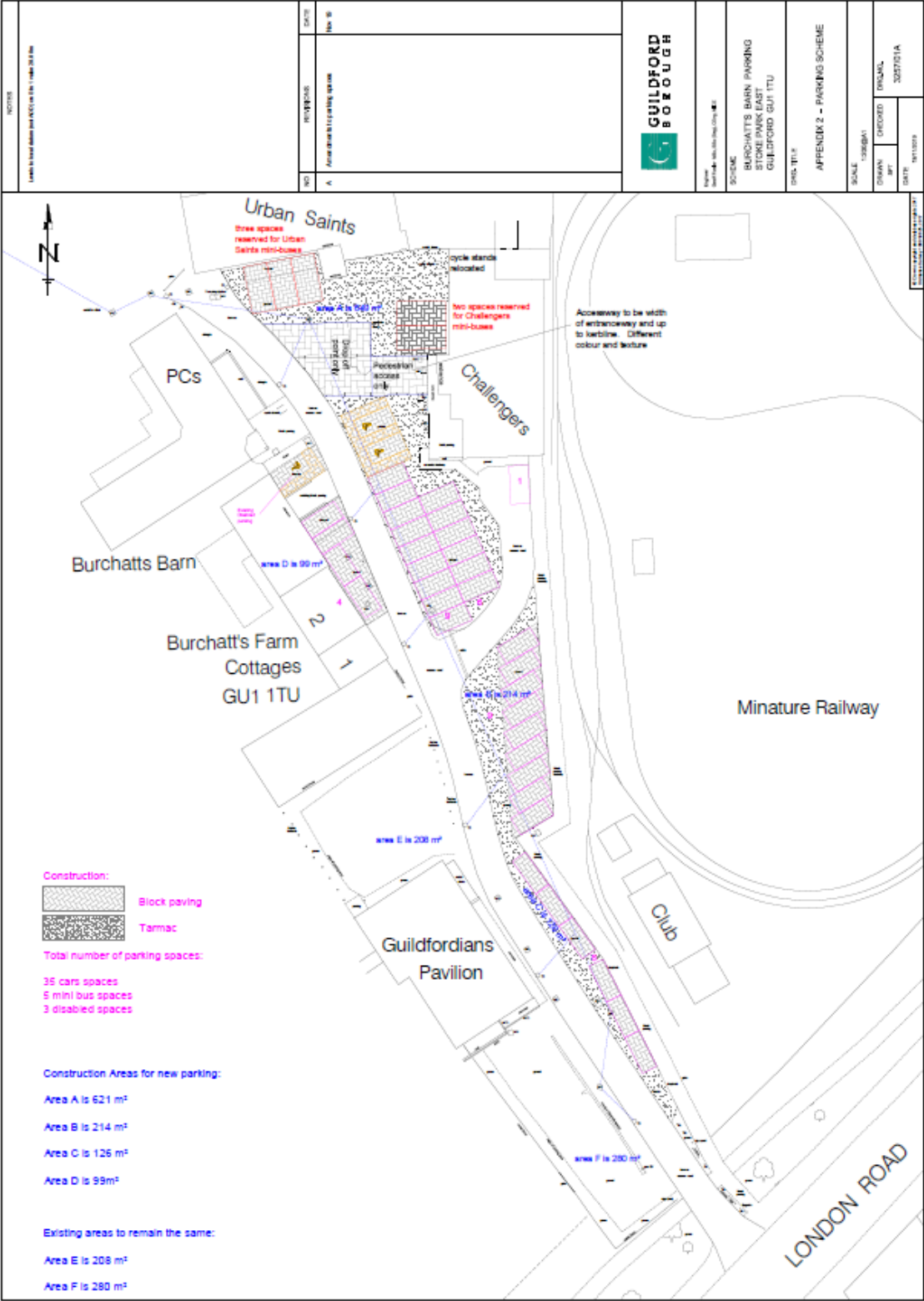
Appendix 3: estimated costs (not for publication)

Image showing existing car park and right of way and photo of the car park



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Proposed layout for Burchatts Farm Barn car park



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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Agenda item number: 6
Appendix 3

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Executive Report

Ward(s) affected: All

Report of Director of Strategy

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Date: 24 March 2020

Property Investment Strategy

Executive Summary

At the end of 2019 the Council's budget projections showed that there was a budget shortfall of £10.4m over the next three years (2020-21 to 2022-23). The capital outturn report 2018-19 reported that for the financial year the Council's total investments of £97.32m achieved a return of 1.42%. The Council's direct property investments of £161m, however, achieved a return (net of finance costs) of 6.3%.

At its meeting on 5 February 2020, the Council approved £40million for a new Property Acquisition Fund. The objective of creating the Fund was to help bridge the funding shortfall with the financial aim of investing in property in order to increase the rental income stream for the Council and to stimulate and encourage business growth and sustainable development by investing in key strategic sites.

The Property Investment Strategy ('the Strategy') shown in Appendix 1 provides a robust and viable framework for the acquisition of commercial properties. The strategy sets out the Council's objectives, investment criteria and the process which will be followed when acquiring, disposing and managing property assets for investment purposes.

Recommendation to Executive

- (1) That the Property Investment Strategy, as shown in Appendix 1 to this report, be approved.
- (2) That the Head of Asset Management be authorised, in consultation with the Director of Strategic Services, the Chief Finance Officer and the Lead Councillor for Finance and Asset Management, Customer Services to acquire property within the set parameters of the Strategy.

Reasons for Recommendation:

To provide a framework and governance that allows acquisition decisions to be delegated to officers within the set parameters of the strategy enabling the timely and decisive decision making that is essential in this type of market to respond to opportunities as they arise.

Is the report (or part of it) exempt from publication?

Yes, Appendix 3 of Appendix 1 of this report.

If “Yes” (whether whole or in part):

- (a) The content is to be treated as exempt from the Access to Information publication rules because it is commercially sensitive and is therefore exempt by virtue of paragraph 3 of Part 1 of Schedule 12A to the Local Government Act 1972 as follows:
“Information relating to the financial or business affairs of any particular person (including the authority holding that information).”
- (b) The content is restricted to all councillors.
- (c) The exempt information is not expected to be made public because it will continue to be commercially sensitive.
- (d) The decision to maintain the exemption may be challenged by any person at the point at which the Executive is invited to pass a resolution to exclude the public from the meeting to consider the exempt information.

1. Purpose of Report

- 1.1 The purpose of this report is to ask the Executive to approve the Property Investment Strategy which will provide the framework and governance for all future investment acquisitions.

2. Strategic Priorities

- 2.1 Developing a property investment strategy will contribute to the Council’s Capital and Investment Strategy 2020-21 to 2024-25 and as such, help the Council achieve financial excellence and value for money. It will enable the Council to make the best use of its resources and it therefore underpins the Council’s strategic framework and the delivery of the corporate plan. It was also identified as part of the Future Guildford service challenge.
- 2.2 The strategy allows for the continual evaluation of the investment portfolio to meet the Council’s priorities and to ensure that our property asset portfolio is fit for purpose.

3. Background

- 3.1 At the end of 2019, the Council’s budget projections showed that there was a budget shortfall of £10.4m over the next three years (2020-21 to 2022-23). The capital outturn report 2018-19 reported that for the financial year the Council’s total investments of £97.32m achieved a return of 1.42%. The Council’s direct property investments of £161m, however, achieved a return (net of finance costs) of 6.3%.

- 3.2 At its meeting on 5 February 2020 the Council approved £40million for a new Property Acquisition Fund. The objective of creating the Fund was to help bridge the funding shortfall with the financial aim of investing in property in order to increase the rental income stream for the Council and to stimulate and encourage business growth and sustainable development by investing in key strategic sites. A larger and more balanced portfolio will help achieve the Council's aim of increasing income to support the delivery of services throughout the borough.
- 3.3 Officers often become aware of key potential acquisitions but, with no approved budget or agreed strategy for acquisitions, cannot act quickly enough to compete with institutional investors to secure opportunities. Having a property investment strategy and budget already approved will enable the timely and decisive decision making that is essential in this type of market to respond to opportunities as they arise.
- 3.4 The strategy provides a robust and viable framework for the acquisition of commercial properties located within the borough (or, exceptionally, the wider LEP regions).
- 3.5 The strategy also provides for continual evaluation of the property investment portfolio to meet the Council's priorities and ensure it is fit for purpose.

4. Consultations

- 4.1 The Investment Property Fund Management Group and the Property Review Group (which includes the Leader of the Council and the Lead Councillor for Finance and Asset Management, Customer Services as well as the Director of Resources) have been consulted on this report and its appendices.

5. Key Risks

Investment Risk

- 5.1 Investment properties have a very different balance of security, liquidity and yield from most financial investments – the potential volatility of income will be particularly important when balancing the revenue budget on an annual basis. Property acquisitions should, therefore, be subject to enhanced decision making and scrutiny as a result of the additional risk being taken on and the potential impact on the sustainability of the authority.
- 5.2 The strategy provides a robust and viable framework for the selection of investment properties that will help to mitigate the risks involved.

Risk of project

- 5.3 Lack of properties available - Demand for good quality, income producing assets is very high. Officers will try to overcome this by maintaining strong relationships with external agents, building credibility as a good performing purchaser and paying introductory fees on successful acquisitions. Officers have considered the use of a retained investment consultant, but this would prevent the Council from

hearing about deals from introductory agents unless it is willing to pay a double fee.

- 5.4 Inability to act quickly enough - Many acquisitions are completed on very tight timescales. By having approvals and resources already in place, officers hope that the Council will be able to compete with institutional investors to take advantage of opportunities.
- 5.5 Lack of resource to asset manage portfolio – Additional resource will be required to deliver the Property Investment Strategy if the Council is to take advantage of opportunities. Subsequently, increasing the Council's investment portfolio will also have an impact on workloads within the Asset Management service. All assets need to be managed and maintained correctly in order to protect the Council's investment.

6. Legal Implications

- 6.1 Guildford Borough Council has a long history of land ownership. Acquisitions have been made for a wide range of reasons including projects relating to urban regeneration, planning enforcement, economic development and to generate rental income that helps support the wider financial position of the Council.
- 6.2 In 2012, the Council implemented and organised a programme of investing, which included acquiring properties or re-purchasing long leases on properties where the Council held the freehold title.
- 6.3 In the last five years other local authorities have also entered the market and there has been an increasing trend to purchase property solely to make an investment return. Often these acquisitions have been supported by borrowing cheaply from the Public Works Loan Board (PWLB).
- 6.4 The Ministry of Housing, Communities and Local Government's (MHCLG) Statutory Guidance on Local Government Investments and CIPFA's Prudential and Treasury Management codes have all been updated recently to address the implications of investment in property. In addition, CIPFA has issued guidance on *Prudential Property Investment*. The scope of the guidance extends to all acquisitions of land and/or buildings where rental income and/or capital appreciation are a substantial consideration in the decision whether to enter into the transaction.
- 6.5 The guidance provides a helpful framework in which to consider the legal implications, and the matters relevant to an authority prior to a decision on acquiring commercial property. There are three basic questions that need to be addressed:
 - Can we acquire? The identification of the legal powers that support the proposed transactions
 - Should we acquire? Demonstration that the exercise of these powers would be reasonable
 - Will we acquire? Confirmation that the authority wishes to take the proposed course of action

Can we acquire a property for commercial or investment purposes?

- 6.6 Any action taken by a local authority must be in accordance with an express legal power. Those legal powers may have express restrictions, limiting the circumstances in which they can be applied. Specific legal powers all have restrictions on the circumstances in which they can be applied.
- 6.7 The power to invest exists in section 12 of the Local Government Act 2003, which provides that a local authority may invest *for any purpose relevant to its functions, or for the purposes of the prudent management of its financial affairs*. Relevant (and recently revised) CIPFA guidance advises against borrowing in advance of need: this is widely interpreted as guiding against the utilisation of Public Works Loan Board funding for the purpose of property investment.
- 6.8 Other relevant powers include section 120 of the Local Government Act 1972, which allows the Council to acquire land for any of its functions or for the benefit, improvement or development of its area.
- 6.9 The general power of competence, under section 1 of the Localism Act 2011 gives local authorities power to do anything that individuals generally may do, subject to certain constraints. anything done for a commercial purpose must be done through a company (Section 4). Clearly, in the instance of property investment, the company would need to hold the property interest, and the Council would be required to consider the source of its funding; the restrictions on borrowing in advance of need would continue to apply whether funds were raised to use by the Council directly, or by a company owned by it, on a loan facility provided by the Council.

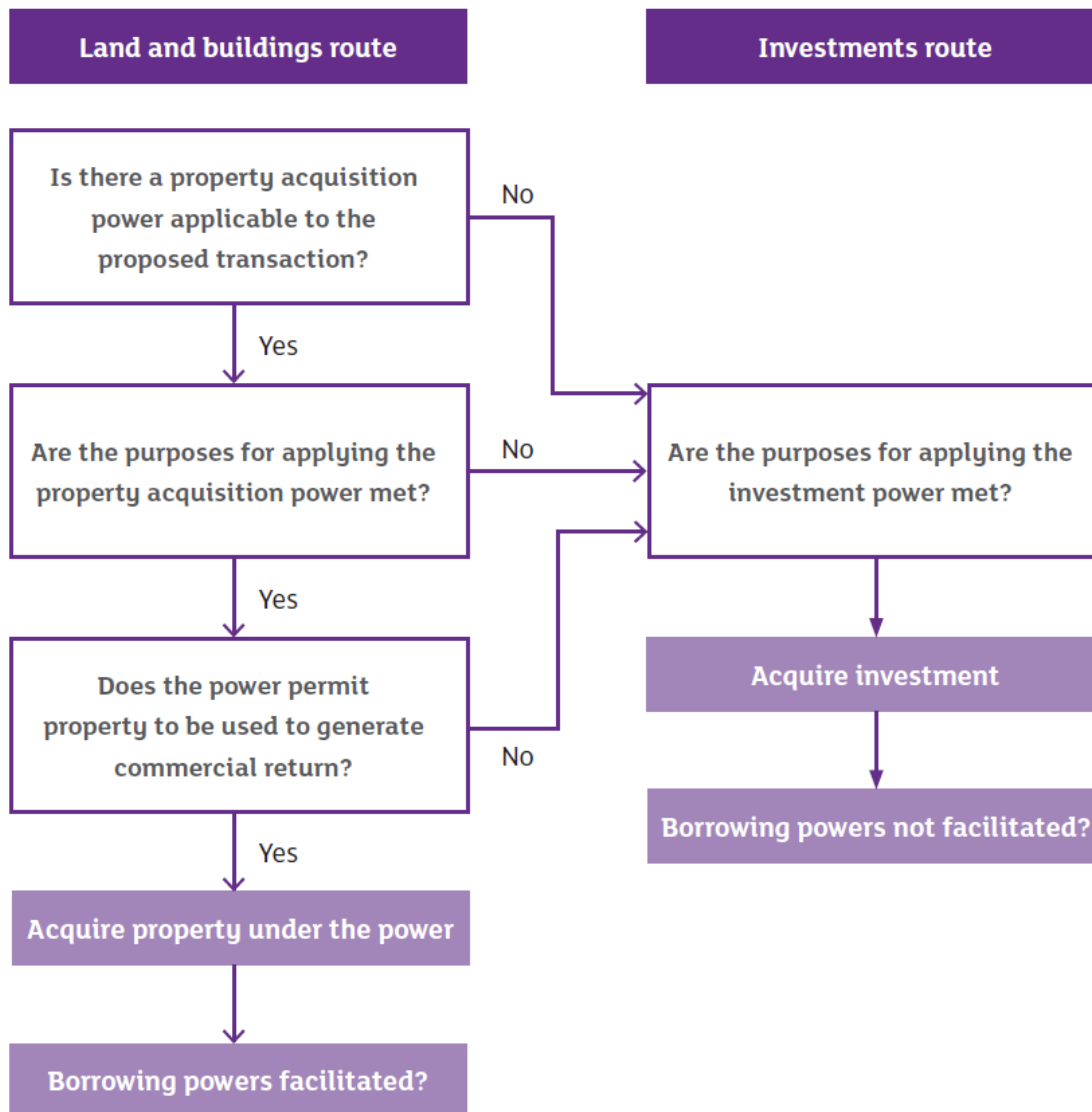


Figure 1: CIPFA Prudential Investment 2019

Should we acquire a property for commercial or investment purposes?

6.10 As with all decisions, the Council must not act ultra vires. I.e. in addition to the relevant legal power, it must act reasonably, on full information, and under appropriately expert advice.

This involves:

- consideration of the Wednesbury principles of reasonableness, i.e. that it had regard to relevant considerations, disregarded irrelevant ones, and was not *so unreasonable that no reasonable authority could ever have come to it*. This includes, therefore, regard to guidance (including statutory guidance), and the advice of expert officers, and consultants:

- regard to the MHCLG's Statutory Guidance on Local Government Investments, including:
 - not borrowing more than or in advance of need
 - transparent reporting about the implications of an acquisition for the security, liquidity and proportionality of the investment and the authority's risk exposure
 - the need for appropriate capacity, skills and culture
- regard to the CIPFA Prudential Code, which requires any acquisition to be:
 - affordable – taking into account the extent to which expenses will be covered by income, including any need to make provision for capital expenditure consistently with the MHCLG's Statutory Guidance on Minimum Revenue Provision¹
 - prudent – maximising the reliability of the elements of the affordability analysis and ensuring risk is controllable within acceptable limits
 - proportional – ensuring that the authority's revenue budget is not over-reliant on income from commercial property and that property does not constitute an inappropriate proportion of the overall investment portfolio.
- acting on appropriately expert advice, and ensuring that provision is in place to properly manage the investment asset (including maintenance, and or the marketing and selection of tenants (where appropriate))

6.11 These matters are covered in the Council's Capital and Investment Strategy 2020/21 – 2024/25.

Will we acquire a property for commercial or investment purposes?

6.12 Where a proposal to acquire property as an investment is confirmed to be reasonable, an authority will determine whether the plans are consistent with its strategies and policies.

Particular attention will be paid to the following areas:

- corporate strategy – managing the expectations of interested parties in relation to the transactions being undertaken
- capital and investment strategy – ensuring that the longer-term nature of property investment and the different balance of security, liquidity and yield fit into the authority's overall strategy for making investments
- property strategy – ensuring that the property can be managed effectively and sustainably with the correct resources made available
- competence to take effective decisions – ensuring that the experience and expertise available to the authority (internal and external) is robust enough to support decisions about acquisition and continuing management of property and allow appropriate scrutiny.

6.13 The property investment strategy seeks to cover the above matters.
Procurement

6.14 The strategy allows for the Council to pursue opportunities introduced by external property agents. The Council will be expected to pay the normal introductory fee on successful completion equating to 1% or less of the agreed purchase price. In addition, solicitors, independent external Valuers and building surveyors will be

¹ The Council must make provision for the repayment of such loans by establishing a Sinking Fund Reserve which will be credited with the statutory annual Minimum Revenue Provision ("MRP") in respect of each unfunded capital decision. Each MRP will be an annual revenue charge to the General Fund and form part of the annual funding cost used to calculate the net return on each investment.

appointed to undertake valuations and conditions surveys as part of the due diligence. In order to react quickly enough to opportunities a blanket exemption to the procurement rules will be required.

7. Financial Implications

- 7.1 A £40 million Property Acquisition Fund was approved by full Council on 5 February 2020.
- 7.2 Allowing for costs and potential capital expenditure of refurbishments, etc, a service challenge target has been set to achieve an additional £850,000 per annum in rental income by 2023.
- 7.3 The Council's Capital and Investment Strategy 2018-19 to 2021-22 outlines the Council's strategy for overall investments and treasury management. The Property Investment Strategy is in line with the aspirations set out in that strategy.

8. Human Resource Implications

- 8.1 To deliver the Asset Investment Strategy and associated service challenge will require the provision of an additional Asset and Property Manager, there is an allowance for this already provided in Reserves.
- 8.2 All assets need to be managed and maintained correctly, increasing the Council's portfolio will have an additional impact on workloads within the team.
- 8.3 There will be also be a resource implication for the legal team. Whilst it is anticipated that the legal work will be outsourced the internal legal services will be required to instruct the external solicitors.

9. Equality and Diversity Implications

- 9.1 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.

10. Climate Change/Sustainability Implications

- 10.1 The Council declared a climate emergency on 23 July 2019. This strategy supports the Council's position regarding this. Consideration will be given to the ethical position and impact on climate change of any acquisition or disposal. In addition, an assessment of any strategic value contribution will be considered, i.e. if the acquisition will contribute to the Council's strategic objectives or add other strategic value (economic, social or environmental). Examples are:

- Economic propositions - (jobs, business, community, etc.)
- Social Value - (health, wellbeing, sustainability, community, etc.)
- Environmental measures - (carbon footprint/emission impact, recycle/reuse profile, air quality, etc)

11. Conclusion

- 11.1 This report outlines the strategy for investing in property in line with the Council's Corporate and Regulatory Framework.
- 11.2 The report details the criteria required for selecting properties and additional conditions to purchase.

12. Background Papers

[Capital and Investment Strategy 2020-21 to 2024-25](#)

13. Appendices

Appendix 1: The Property Investment Strategy

Appendix 2: The 2019-20 Funding Bid for the Property Investment Fund


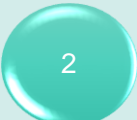

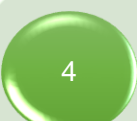
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COMMERCIAL PROPERTY INVESTMENT STRATEGY 2020

PURPOSE OF THE STRATEGY

The purpose of the Commercial Property Investment Strategy 2020 “the strategy” is to provide a robust and viable framework for the acquisition of commercial properties. This strategy sets out the Council’s objectives, investment criteria and the process which will be followed when acquiring, disposing and managing property assets for investment purposes. It replaces the previous Asset Investment Strategy and business case – September 2014.

KEY OBJECTIVES

-  To invest in properties that provide a sustainable income in accordance with the Councils corporate and financial objectives
-  To maximise return whilst balancing risk through the management processes outlined in this strategy
-  To acquire investment grade properties possessing characteristics that retain liquidity and preserve capital (notwithstanding market movement)
-  To develop a governance framework that enables the Council to move at a timely pace in line with the market

STRATEGIC DRIVERS

A larger and more balanced property portfolio supports all the fundamental themes of the Corporate Plan and the Council’s strategic priorities and will help achieve the Council’s aim of increasing income to support the delivery of services. The acquisitions search will concentrate on properties within the Borough of Guildford (and exceptionally the wider LEP region), particularly on assets that would provide a longer-term strategic benefit as well as financial return.

The types of assets that are likely to meet the Council’s criteria include leased properties let to local businesses as well as national or international firms that contribute to growth in the local economy. The acquisition of property interests in order to consolidate leasehold and freehold ownerships (i.e. buy back in long leaseholds) will also qualify. In such cases, the Council will buy the asset, refurbish and upgrade them, where appropriate, and lease them to good quality tenants.

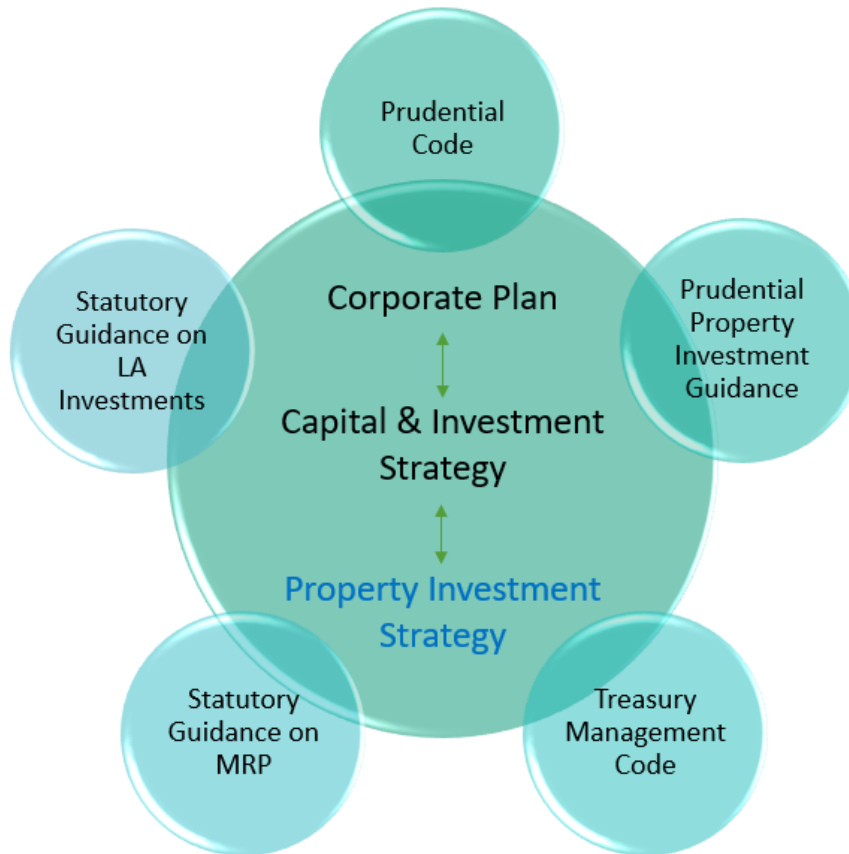


FIGURE 1: CORPORATE AND REGULATORY FRAMEWORK

Where rental income and/or capital appreciation are a substantial consideration in the decision whether to enter into the transaction attention must be given to the Council’s investment objectives contained in the capital and investment strategy.

This strategy, therefore, sits in conjunction with the Council’s Capital and Investment Strategy 2020/21 – 2024/25 as well as satisfying the requirements of the Prudential Code and Statutory Framework with regard to property investments.

GOVERNANCE

SOURCING ACQUISITIONS

The Council may either approach a vendor directly or through third party agents to notify its interest in a property investment / proposal. The Council will also accept unsolicited introductions from agents in respect of individual properties.

If the Council receives an initial introduction from an agent and wishes to pursue the opportunity further, it will expect to pay an introductory fee on successful completion. Introductory fees are usually 1% of the agreed purchase price.

It is also possible that an opportunity may arise for the Council to enter into a joint venture with another local authority, developer or investor.

In order to ensure the Council is made aware of the latest and best opportunities, officers will need to maintain relationships with external agents and build credibility as a good performing purchaser / vendor and an excellent organisation to do business with.

The Council's main point of contact for all acquisitions / disposals will be the Deputy Head of Asset Management.

PORTFOLIO STRUCTURE / DIVERSIFICATION

The Prudential Code states that a Council must invest its funds prudently and have regard to the security (protecting capital sums from loss) and liquidity (keeping money readily available for expenditure when needed or having access to cash) of investments before seeking the highest rate of return, or yield.

The Capital and Investment strategy sets out the Council's risk appetite and states that the Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income.

Investment properties have a very different balance of security, liquidity and yield from most financial investments – the potential volatility of income will be particularly important when balancing the revenue budget on an annual basis. Property acquisitions should, therefore, be subject to enhanced decision making and scrutiny as a result of the additional risk being taken on and the potential impact on the sustainability of the authority.

A major objective of the property investment strategy is to invest in assets that support the strategic priorities set out in the Corporate Plan or provide sustainable income, whilst balancing a portfolio diversified enough to provide protection against underperformance in any one sector.

From a strategy point of view, it is generally considered to be most advantageous to have criteria as wide as possible to identify the most suitable investments to form the constituent parts of the portfolio jigsaw and be able to react to structural changes in the market. This is particularly true in strong market conditions when demand for good quality, income producing assets is very high. As such, this strategy has not set target weightings for any specific asset sectors although sector diversification will be monitored.

Diversification by risk will also be considered (within the guidelines of the Council's Capital and Investment Strategy). In general terms, risk and return have a direct correlation in that the greater the risk, the greater the expected return should be. The last 20 years has seen a significant reduction in lease length and the increasing prevalence of break options. This represents a significant shift of risk from tenant to landlord. By having a net initial yield target that increases as the matrix criteria score decreases allows us to appropriately price the risk around lease length and covenant strength exposure (as well as other criteria) (see Appendix 3 for more details).

In addition, to limit the risks arising from other factors the following guidelines will be considered when selecting properties for investment:

- Lot size - No single asset should be over 20% of the portfolio value to limit the risk arising from individual assets.
- Income risk – No single tenant should account for more than 20% of total income once full invested to limit the exposure of tenant failure.

SELECTION OF INVESTMENTS / DISPOSALS

To enable the Council sufficient scope to identify suitable properties and to build and maintain a portfolio which can achieve the desired objectives and aims of the strategy, properties will be assessed against a set of financial and qualitative criteria. To summarise this will include:

FINANCIAL	
Lease Classification	The lease should be classified, for accounting purposes, as an operating lease rather than a finance lease, to ensure that rental income can be treated as revenue ¹
Internal Rate of Return (IRR);	The internal rate of return (IRR) should exceed a minimum level of minimum IRR is 3.5% or 2% above projected borrowing cost (incl. interest + MRP ²) whichever is the higher. The internal rate of return is typically higher than the initial yield, since it gives an overall level of return over the holding period of the investment. This is calculated using a discounted cash flow and can allow for rental growth, void periods, refurbishment expenditure and so on.
Net Yield (NIY)	Due to the Council's requirement to generate income through a satisfactory level of return, whilst still reducing the level of risk, a minimum net initial yield that we could expect to achieve on the investment will be set and increase on a sliding scale as the risk return matrix score reduces.
QUALITATIVE	
Location	Dictated by the opportunities available but concentrating on properties located in prime or near-prime locations
Tenancy strength	Preference will be given to single occupancy investments let or lettable to financially secure tenants with a good covenant, although multi-let properties will be considered.
Tenure	Freehold or long-leasehold
Occupiers lease length	Longer lease length - lease length will be determined by market forces, but the premise will be to maximise
Repairing terms	Preference for strong tenant repairing obligations shifting the risk from Landlord to Tenant
Lot size	The main target will be lot sizes representing 5 – 15% of the over portfolio.
Building condition	Good quality, sustainable buildings in good condition or that can be put into good condition Low maintenance and low obsolescence.
Strategic Value	Contribution to the Council's strategic priorities identified in the corporate plan or other strategic value (economic, social or environmental). Economic propositions (jobs, business, community etc) Social Value (health, wellbeing, sustainability, community etc) Environmental measures (carbon footprint / emission impact, recycle / reuse profile, etc)

¹ Operating leases are those where the risks and rewards of ownership are retained by the lessor (the Council) and must meet certain criteria. The main criteria being that the lease term should not be for the major part of the property's economic life and at the start of the lease, the total value of minimum lease payments (rents) should not amount to a significant proportion of the value of the property.

² Minimum Revenue Provision

Full details are in Appendix 3.

CONDITIONS TO PURCHASE

Further conditions to purchase will be:

- the investment is in line with the Council's strategies and policies;
- the ethical position of the investment is strong;
- the investment or disposal is within the Council's legal powers;
- the investment or disposal is reasonable³;
- it has properly considered advice from its professional advisors, whether internal or external;
- the business case is sufficiently strong;
- proper consideration has been given to the balance between risk and reward;
- making the investment or disposal would not be a breach of the Council's fiduciary duty;
- making the investment or disposal will represent value for money; and
- the proposed funding method provides the best value for money after considering all relevant financial considerations, including taxation.

APPROVAL PROCESS TO PURSUE OPPORTUNITY

All acquisitions / disposals are to be approved by the Investment Property Fund Management Group (IPFMG) which includes the Director of Resources, Lead Specialist (Finance), Head of Asset Management, Deputy Head of Asset Management and Asset & Property Managers.

The IPFMG (which meets monthly) will review each proposal in respect of each of the conditions to purchase and decide if the business case in favour of investment / disposal is sufficiently strong. If the group are happy with the proposed acquisition disposal it will be referred to the member and officer represented Property Review Group (PRG) for approval.

If either group cannot meet in time then the matter will be approved by the Lead Member for Finance, Asset Management and Customer Service, Director of Resources, and Head of Asset Management.

All investments will be approved on the basis of a robust business case which will give due consideration to the balance between risk and reward, an assessment of the underlying security of the investment. As a minimum this will include:

- a basic purchase report (including details of the opportunity, location, age, tenure, tenant covenant, lease terms, exit strategy, etc.);
- an investment risk and return matrix (a score matrix based on the chosen criteria);
- a financial analysis (a cashflow analysis demonstration the long-term income and costs based on a number of different risk scenarios); and
- the percentage of total income of the portfolio against covenant strength
- potential exit strategies.

See Appendix 1 – Acquisition Flow Chart

³ The exercise of the powers must be 'reasonable'. Consideration must be given to the Wednesbury principles. CIPFA, *Prudential Property Investment* (2019), pg. 17.

RISK MANAGEMENT MEASURES

Property has some significant different characteristics and risks compared to other types of investment. Mitigation proposed for these risks include diversifying the portfolio (portfolio mix) to include investments that perform differently over the economic cycle.

The evaluation criteria, approval processes, due diligence tests, and internal / external advice are also proposed to address property specific risks.

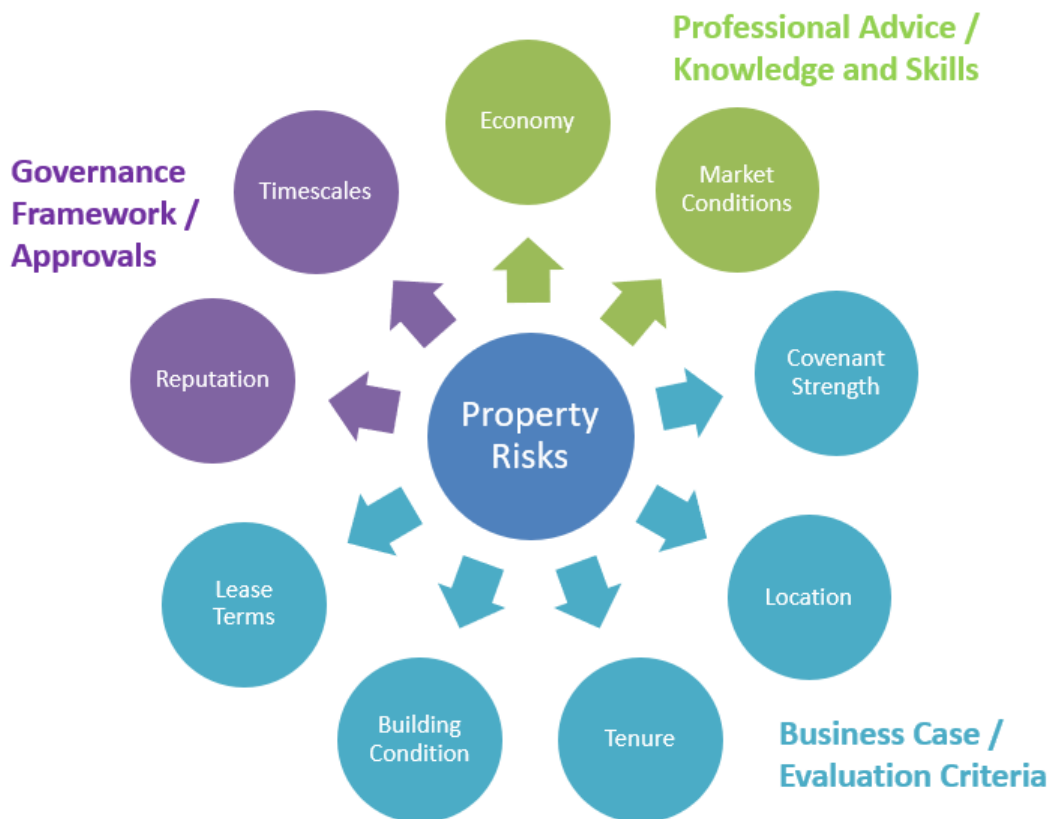


FIGURE 2: PROPERTY RISK GROUPS

Business Case / Evaluation Criteria

Officers will seek to mitigate the risk by preparing robust business cases including detailed cash flow models for different risk scenarios and scoring matrices.

Governance Frameworks / Approvals

Clear governance arrangements and scrutiny procedures for the acquisition, disposal, management of commercial property and decision-making powers will enable the timely and decisive decision making that is essential in this type of market to respond to opportunities as they arise. This will also enhance the Council's reputation as a good performing purchaser / vendor.

Due Diligence

Acquisitions will also be conditional on full due diligence, including:

- full title report and legal pack to be produced by external solicitors;
- a review of the tax implications;

- an independent surveyor's valuation of the property and detailed purchase report to support the purchase price; and
- satisfactory surveys.

Profession Advice / Knowledge and Skills

The complexities of investment in property mean that it is vitally important for the Council to be competent to take decisions to acquire, hold and dispose of land and buildings. This does not require all the expertise and experience to be in-house, but members and officers must have sufficient competence to understand and evaluate the advice they are given and make reasonable decisions in relation to it or to overseeing the decisions taken by others.

The Council is satisfied that we currently have internal staff with the requisite skills and experience to undertake these investments. The Council will also engage the services of professional property, legal and financial advisors, where appropriate, to access specialist skills and resources to inform the decision-making process associated with this strategy.

The Council recognises that it is responsible for property investment decisions at all times and will ensure that undue reliance is not placed upon external service providers and will maintain sufficient in-house expertise to manage the procurement of investments through the Corporate Property team.

PORTFOLIO MANAGEMENT / REVIEW

A larger and more balanced portfolio will help achieve the Council's aim of increasing income to support the delivery of services throughout the Borough. However, the acquisition of property is only the first step in achieving the objectives of the strategy. It is essential that the portfolio is correctly managed, and value added. This will take the form of:

- Negotiating leases on the best possible terms.
- Preparing for and having an action plans for all lease critical dates, break options, rent reviews and expires.
- Enforcing tenant covenants (e.g. repairing obligations).
- Investing where necessary to retain property value.
- Reducing risk by requesting rent deposits / guarantees and undertaking continual analysis of covenant strength.
- For all buildings to be sustainable and held to a high standard of repair, by undertaking regular condition surveys and linking the output of the condition survey to an identifiable programme of works.
- For all properties to be fully compliant with statutory requirements including health and safety and energy efficiency regulations.
- Continual evaluation of properties against the evaluation criteria and the Council's priorities and ensure it is fit for purpose and categorising into Retain / Retain with improvements / Dispose.
- Pursuing individual strategies for top 5 properties by value or high-risk properties, as necessary.
- Selling high cost or underperforming assets (see Appendix 2 – Disposal Decision Tree).

Management of the Council's assets is covered more in the council's asset strategy and framework

PERFORMANCE REPORTING

To ensure the assets are being correctly managed performance monitoring will be reported initially through the IPFMG, the PRG and then the Executive as part of the Capital Investment Outturn Report.

Annual performance reporting will include:

- A market update on investment trends, activity and forecasts
- An update on the occupational markets
- A review of current investment strategy
- Benchmarking the existing portfolio and asset level investment returns
- Reporting on performance of the portfolio and individual assets
- Provision of a review of portfolio activity and the added value created over the previous 12 months
- An update on individual asset reviews and Keep/Improve/Sell asset designation

The IPFMG will also consider the following, as and when required:

- Re-confirmation of investment criteria;
- identification of any re-alignment required to match market changes and forecasts;
- advice on all critical lease dates, break options, rent reviews and lease expiries (especially in relation to the top 5 assets); and
- any health and safety incidents and insurance claims.

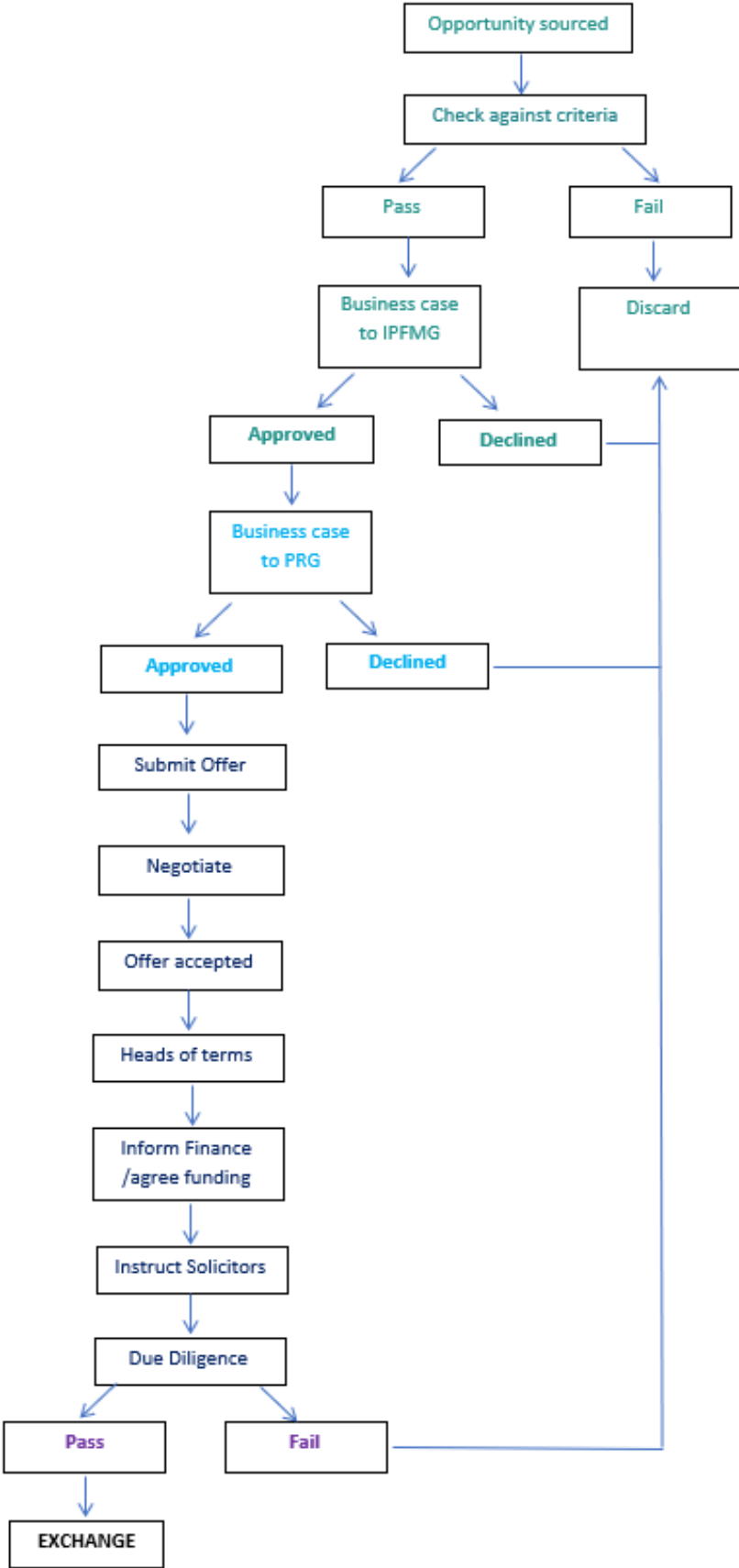
This will provide a clear understanding of the portfolio's position and management, its risk and return profile and any latent value that can be driven out through strategic asset management.

PORTFOLIO VALUATION

In accordance with the International Financial Reporting Standards the investment portfolio is externally valued every year in accordance with the RICS Red Book and the International Valuation Standards.

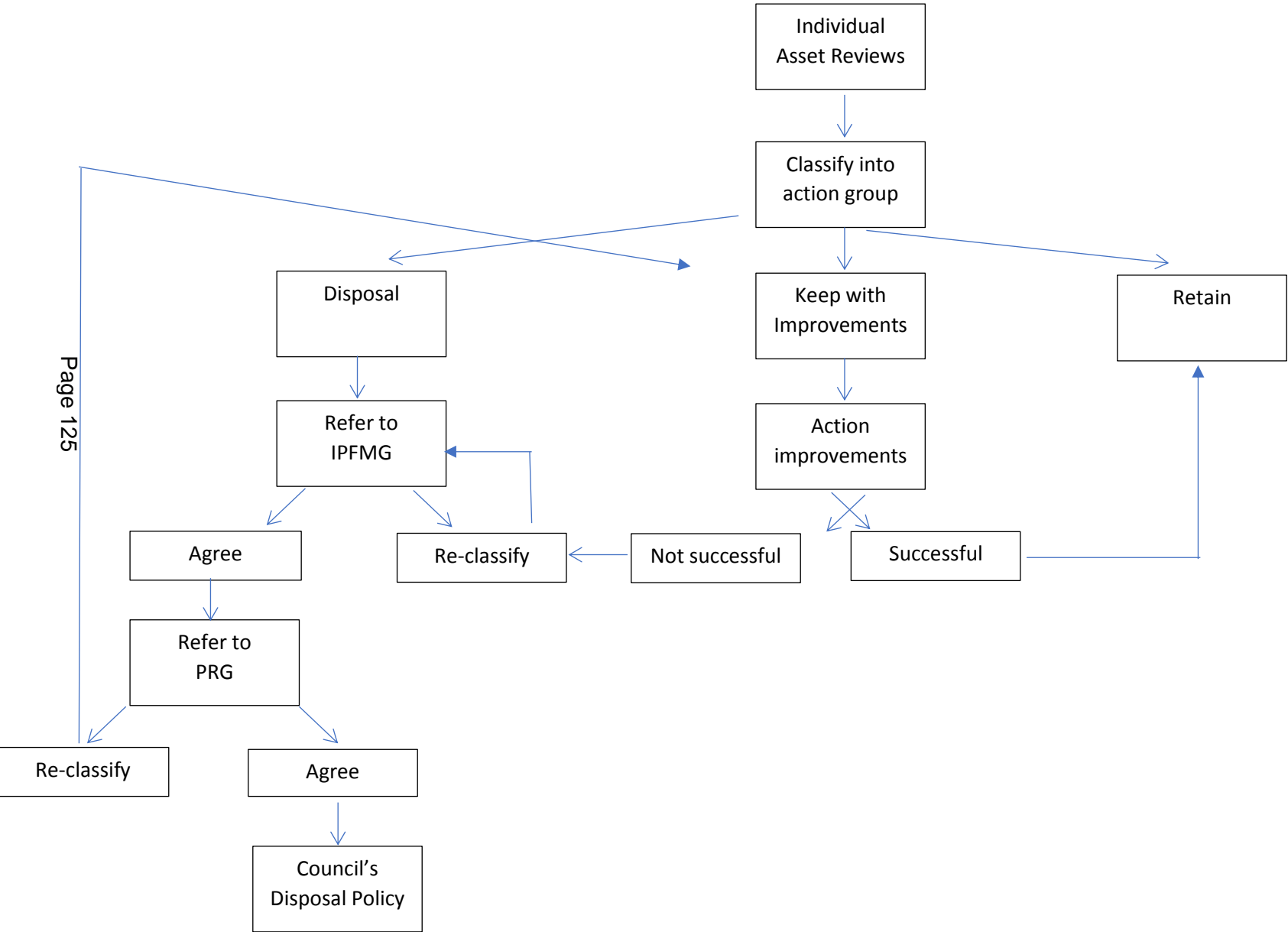
Annual valuations are important not only for regulatory purposes but also to ensure that current book values are in line with the prevailing market and this enables individual assets or the wider portfolio to be benchmarked against wider performance of the commercial property sector or the market as a whole.

APPENDIX 1 – ACQUISITION FLOWCHART



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APPENDIX 2 – DISPOSAL DECISION TREE



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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Agenda item number: 7
Appendix 4

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Executive Report

Ward(s) affected: All

Report of Director of Strategic Services

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Lead Councillor responsible: Jan Harwood

Tel: 07507 505363

Email: jan.harwood@guildford.gov.uk

Date: 24 March 2020

Local Development Scheme 2020

Executive Summary

This report seeks to agree an updated Local Development Scheme (LDS) for the new Local Plan: development management policies. The LDS sets the timetable for plan production and opportunities for stakeholders to be involved in the process.

As a Development Plan Document (DPD), the Local Plan: development management policies must be prepared in accordance with the statutory process. As such there are a number of stages that it must go through, including a number of public consultations. The LDS sets out these key milestones for the forthcoming Guildford borough Local Plan: development management policies.

Recommendation to Executive

That the Local Development Scheme, as set out in Appendix 1 to this report, be adopted with effect from 1 April 2020.

Reason(s) for Recommendation:

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.

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

1. Purpose of Report

1.1 An up to date Local Development Scheme (LDS) is required to progress the new Local Plan: development management policies for Guildford borough. This document sets out a timetable for preparing the documents that make up the Council's development plan (namely the Local Plan).

1.2 As set out in the Planning and Compulsory Purchase Act 2004 (as amended), the Council has a statutory requirement to prepare Local Plan documents in

accordance with the timetable in the LDS. Officers have revised the timetable for the Local Plan: development management policies, and this report asks the Executive to approve the updated document.

2. Strategic Priorities

- 2.1 The updated LDS is an essential pre-requisite to achieving the new Local Plan: development management policies, which will contain a suite of planning policies that support the achievement of the Council's strategic priorities.

3. Background

- 3.1 An LDS is required by the Planning and Compulsory Purchase Act 2004 (as amended). The LDS must specify the local plans which, when prepared, will comprise part of the development plan for the area.
- 3.2 The LDS is the timetable and project plan for the production of the new Local Plan. It explains what documents the Council intends to prepare and when, in order to plan for future development in the borough.
- 3.3 The Council adopted the previous LDS on 3 September 2018 prior to the Council undertaking consultation on Main Modifications to the Local Plan: strategy and sites (LPSS) that were required by the Inspector. The LPSS was adopted by the Council on 25 April 2019 and the Council is now embarking on preparing the second part of the new plan; the Local Plan: development management policies.

4. Consideration of the timetable

- 4.1 There are a number of stages in the process that are difficult to quantify and could potentially result in delays to the new adoption date. First, the number of responses received as part of the various consultation stages. The previous LPSS generated a significant number of responses; however, it is envisaged that the less contentious nature of this plan will result in far fewer responses. However, should a significant number of responses be received then these will take time to process and may result in delays to the process.
- 4.2 Second, the LDS assumes that there will be only one Regulation 18 consultation and one Regulation 19 consultation. This accords with the minimum statutory requirements in producing a new Local Plan. Whilst the changes between Regulation 18 and Regulation 19 consultation versions can be significant, main modifications cannot be made to the Regulation 19 consultation version and the version that is subsequently submitted to the Secretary of State (the Submission Local Plan). For this reason, if main modifications are considered necessary then a further Regulation 19 consultation would need to be undertaken and this would result in a delay to the process.

5. Scope of the new Local Plan

- 5.1 The Local Plan: development management policies will provide the more detailed policies to be used by Development Management in the determination of

planning applications. Once adopted it will supersede all the extant Local Plan 2003 policies and will form part of the Council's development plan.

6. Consultations

6.1 The timetable has been shared with the Leader and Portfolio holder.

7. Key Risks

7.1 The risks of delay to the process as a result of higher than anticipated levels of consultation or the need for further consultation are covered above in para 4.1 and 4.2.

7.2 Significant changes to legislation especially in relation to biodiversity and climate change could also necessitate revisiting policies and potentially further consultation.

8. Financial Implications

8.1 The costs associated with preparing the new Local Plan: development management policies can be considered against a number of discrete parts:

- Finalising the evidence base – includes costs associated with consultants and the commissioning of studies. This includes ongoing external support preparing the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)
- Carrying out Regulation 18 and Regulation 19 consultations. This would include costs associated with undertaking consultation events (venue hire, etc) and temporary staff necessary to input consultation responses into the consultation database.
- Legal costs. This includes ongoing support by barristers to the plan meets all legal requirements.
- Examination costs. This includes costs associated with funding an independent planning inspector and programme officer to support them.

8.2 The above expenditure has been budgeted for.

9. Legal Implications

9.1 A Local Development Scheme is required under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended). This must specify the development plan documents (i.e. local plans) which, when prepared, will comprise part of the development plan for the area. The Local Development Scheme must be kept up-to-date and made publicly available.

9.2 Under the Council's Constitution and in accordance with section 9D Local Government Act 2000, the Executive has the power to make decisions in relation to the coming into effect of the Local Development Scheme.

10. Human Resource Implications

- 10.1 As we prepare the Local Plan there will be additional temporary resources needed at crucial times such as during and after a consultation period in order to input and process responses. There is also likely to be overtime implications for existing staff during these periods. Over and above this, we do not envisage the need for additional staffing resource.

11. Equality and Diversity Implications

- 11.1 All public authorities are required by the Equalities Act 2010 to specifically consider the likely impact of their policy, procedure or practice on certain groups in the 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 There is no requirement for an EqIA on the LDS.

12. Climate Change/Sustainability Implications

- 12.1 The updated LDS is an essential pre-requisite to achieving the Local Plan: development management policies. The new Local Plan will contain a suite of planning policies that contribute to the achievement of climate change objectives.

13. Conclusion

- 13.1 Having an up to date LDS is a fundamental requirement to enable the Council to progress the new Local Plan through to adoption. It is important that members of the public and other interested parties know the Council's timetable for producing our Local Plan, and how and when they can get involved.

14. Appendices

Appendix 1: Guildford Borough Council Local Development Scheme 2020

Guildford borough Local Plan Local Development Scheme 2020

Summary

The Local Development Scheme (LDS) is the timetable and project plan for the new Guildford borough Local Plan. The LDS explains what Development Plan Documents we will be preparing and when, to plan for future development in the borough.

To see the latest progress against the LDS timetable, view our webpage at www.guildford.gov.uk/lds.

Use the LDS to see when you can get involved in planning for the area. You can also sign up for details and notifications of all our consultations at <https://guildford.inconsult.uk/consult.ti/system/listConsultations?type=all>.

1. Background

There are two different types of planning policy documents:

- Development Plan Documents (DPDs) - the Town and Country Planning (Local Planning) (England) Regulations 2012 refers to these as Local Plans. These are the main planning policy documents produced by the Council and form part of the statutory development plan for the area; and
- Supplementary Planning Documents (SPDs) – these are designed to expand on policies in DPDs or provide additional detail.

The Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) requires councils to prepare and maintain an LDS setting out the DPDs that it intends to prepare, together with details and a timetable for their preparation.

The National Planning Practice Guidance (NPPG) states that the LDS must specify the documents which, when prepared, will comprise the Local Plan for the area. It must be made available publicly and kept up-to-date as it is important that local communities and interested parties can keep track of progress.

The first part of the new Local Plan has already been produced and was adopted on 25 April 2019. The adopted Local Plan: strategy and sites (LPSS) identifies Guildford's housing, employment, retail and traveller need and allocates sufficient sites to meet these needs. Whilst it primarily includes strategic policies, it does contain a small number of more detailed development management policies where these were necessary to implement the strategic policies, for example those relating to Green Belt, employment and retail. The Council is now preparing the second part of the Local Plan which will contain the full suite of detailed development management policies.

The composition of the existing and future development plan, are illustrated in Figure 1 below.

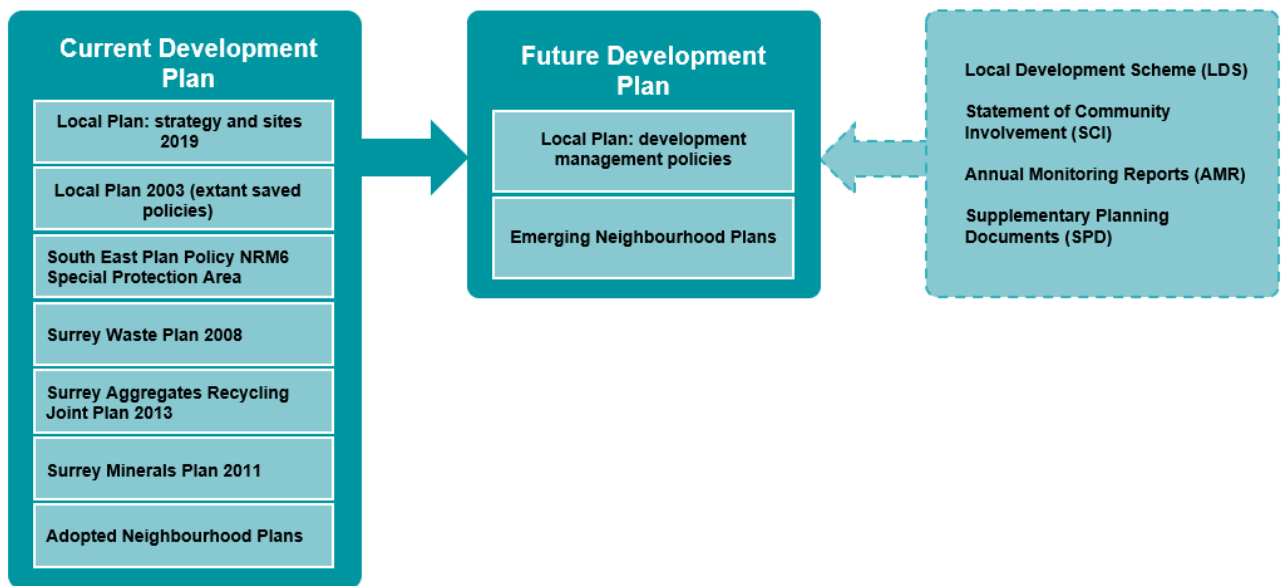


Figure 1: the proposed future development plan for Guildford borough, including the new Local Plan

2. The current planning policy position

As set out above the recently adopted LPSS forms part of the development plan and carries full weight. You can read this at www.guildford.gov.uk/localplan/2015-2034. The policies contained therein supersede parts of the previous Guildford borough Local Plan 2003. You can read the policies that remain extant at www.guildford.gov.uk/localplan/2003. The policies within the Local Plan 2003 that have been superseded are listed in Appendix 8 of the LPSS.

The intention is that once the forthcoming Local Plan: development management policies document is adopted that this will, alongside the LPSS, supersede the Local Plan 2003 in its entirety.

Policy NRM6 contained within the South East Plan 2009 that deals with the Thames Basin Heaths Special Protection Area is still relevant to the determination of planning applications.

The Government published the National Planning Policy Framework (NPPF) in March 2012 and this was recently updated in July 2018, and again in February 2019 (albeit the latter update was very minor in nature). Annex 1 of the NPPF states that the Council can continue to give weight to relevant policies in the adopted Local Plan according to the degree to which those policies are consistent with the NPPF (paragraph 213). Any new Local Plan being prepared must be consistent with national planning policy.

National Planning Practice Guidance¹ (NPPG) has also been published which replaces previous guidance and shows how the NPPF should be implemented in development plans. It is an online resource that is capable of being updated regularly.

Planning for minerals and waste is the responsibility of Surrey County Council, which produces its own LDS for the future production and review of its Waste and Minerals Plans. For more details, see www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste. We are a consultee during the preparation of these documents for Surrey County (including our area).

3. Supplementary planning guidance and documents

We have adopted a number of Supplementary Planning Documents (SPDs) providing additional information on a range of topics. These documents do not create policy but provide additional guidance on existing policies. You can view these at www.guildford.gov.uk/localplan/spd.

We have also previously produced a number of additional non-statutory planning guidance documents, which can also be viewed via the above link. We will continue to produce SPDs as required and these will be available on the same link.

4. Community engagement

Planning shapes the environment that we live in, where we live, work, shop and play. Planning decisions determine where new homes, offices, shops and leisure facilities go and what happens to our countryside, open spaces and historic environment. You can be involved in how our borough develops from the early stages of local planning policy formulation to the end stage of commenting on planning applications. What you think matters and we will try to reflect this in the documents we produce and the decisions we make. Whilst there will not always be a consensus of views, we will always listen to what you have to say.

The Council has recently revised its Statement of Community Involvement (SCI). You can read this at www.guildford.gov.uk/sci.

5. Evidence base

A comprehensive list of the Evidence Base that informed plan making to date is set out in Appendix 7 of the LPSS. The existing evidence base, together with any new evidence commissioned to inform the forthcoming Local Plan can be viewed at www.guildford.gov.uk/localplan/evidencebase.

6. Community Infrastructure Levy

For the latest information on Community Infrastructure Levy (CIL) please visit our website www.guildford.gov.uk/localplan/cil.

7. Guildford borough Local Development Scheme 2020

The detailed timetable for the production of the new Local Plan is set out in Appendix 1 below. This LDS supersedes the previous LDS approved on 4 September 2018.

The preparation of the Local Plan includes a number of formal consultation periods when you can get involved:

- Draft Local Plan Regulation 18 consultation (Issues, Options and Preferred Options)
- Proposed Submission Regulation 19 consultation

8. Policies Map

A Policies Map geographically illustrates the land use designations, policies and site allocations of DPDs on an Ordnance Survey base map².

² This is in accordance with Regulation 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012

The current Policies Map forms part of the adopted LPSS and any non-superseded policies of the Local Plan 2003.

Any Local Plan must be accompanied by a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA)). These will be published simultaneously as part of any consultation on the Local Plan.

There is also a legal requirement³ to consider whether new planning policy documents are likely to have a significant effect on European sites of nature conservation importance, prior to the Plan being given effect. Habitats Regulations Assessment (HRA) will be produced for the Local Plan.

Equalities impact assessment (EqIA) screening (and if necessary an EqIA) or similar will also be used to consider the potential differential effects of the Local Plan policies on sections of the community as we prepare these.

In preparing the Local Plan, we will comply with the requirements of the legal duty to co-operate, introduced by the Localism Act 2011. This requires local councils and other prescribed organisations to work together to cooperate on relevant strategic and cross boundary planning matters. Guildford Borough directly adjoins six other local planning areas – Woking, Elmbridge, Waverley, Mole Valley and Surrey Heath in Surrey and Rushmoor in Hampshire. Some strategic issues may require us to cooperate on an even wider basis and the organisations we need to work with will vary depending on the strategic issue. Our progress on complying with the duty to cooperate is reported through our Annual Monitoring Report (www.guildford.gov.uk/localplan/monitoring).

Preparation of the Local Plan will also involve co-operation with Surrey and Hampshire County Councils, Highways England, the Environment Agency and a number of other prescribed bodies⁴.

9. Monitoring

Progress against the LDS will be reviewed and reported in the Annual Monitoring Report. In doing so we will consider what changes, if any, need to be made and will bring forward such changes through a formal review of the LDS.

10. More information

This document was produced by the Planning Policy Team, Guildford Borough Council, Millmead House, Millmead, Guildford, Surrey, GU2 4BB.

If you have any questions about the LDS or the Local Plan, please contact the Planning Policy team:

Telephone: 01483 444471

Email: planningpolicy@guildford.gov.uk

³ Through the Conservation of Habitats and Species Regulations 2010 (the Habitat Regulations)

⁴ The prescribed bodies are set out in the Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Appendix 1: Detailed timetable

New Guildford borough Local Plan: Development Management Policies	
Note – the following dates are estimates only	
Scope	Sets out the development management policies for the development of the borough to provide a framework for decision making on applications for development.
Which saved policies will it replace?	Will supersede any remaining policies in the Local Plan 2003
Geographical coverage	Borough wide
Status	Development Plan Document
Conformity	Consistent with the National Planning Policy Framework
Timetable	
Evidence base gathering, draft the plan, sustainability appraisal and governance processes	April 2019 – March 2020
Consultation on draft Local Plan: Development Management Policies (six weeks) (Regulation 18)	April – May 2020
Analysis of representations, preparation of submission plan, sustainability appraisal, governance processes	June 2020 – February 2021
Pre-submission publication and consultation (six weeks) (Regulation 19)	March – April 2021
Submission to the planning inspectorate for Examination (Regulation 22)	September 2021
Examination in public – hearings (Regulation 24)	March 2022
Anticipated adoption (Regulation 26)	September 2022
Preparation	
Lead Service	Planning Policy, Strategic Services
Management	Corporate Management Team, the Lead Councillor for Planning, the Local Plan Panel will consider draft documents prior to consultations
Resources	Planning Policy Team, with input from colleagues including

Guildford borough Local Development Scheme 2020

	Development Management, Parks and Leisure, Environmental Health, Surrey County Council, and external specialists and consultants as required
Community and Stakeholder involvement	In accordance with the published Statement of Community Involvement

Agenda item number: 8
Appendix 1

Executive Report

Ward(s) affected: All

Report of Director of Strategic Services

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Lead Councillor responsible: Jan Harwood

Tel: 07507 505363

Email: jan.harwood@guildford.gov.uk

Date: 24 March 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 from 20 April until 8 June 2020.

Recommendation to Executive

That the Executive recommends to Full Council:

- (1) That the draft Local Plan: Development Management Policies document, incorporating any changes recommended by 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.

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 20 April 2020) and to allow for any minor amendments or typographical changes to be made following the 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 in 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) is also before the Executive for adoption 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 the 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 on at its meeting on 17 February 2020.
- 6.4 This report seeks authority to commence a wide-ranging statutory consultation that will engage with all stakeholders and help to inform the Regulation 19 Proposed Submission Local Plan. The process will include three events across the borough, one in the east, west and central. The event in the centre of the borough will occur on a Saturday whilst the other two events will be held during the week in the afternoon and evening. This will help make the events accessible to all.

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 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 Regulation 18 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. Cost 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. Following consultation with the Finance team, you must cover both capital and

9. Legal Implications

- 9.1 The current system of plan making is contained in the Planning and Compulsory Purchase Act 2004 and the Town & 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. 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 Regulation 19 of the Local Planning Regulations.
- 9.2 Under the Council's Constitution and in accordance with the statutory provisions contained 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 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 the 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. It is not considered necessary to carry out a full EqIA. This document will 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). 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) will also be prepared. 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. EAB made the following comments to which responses have been provided.

- 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 addressing climate change issues.
- 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.
 - 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.
- Examples of high-quality design would greatly improve understanding of the document.

- 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 supplements and provides 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. 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. 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.

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 *(to follow for Full Council)*

Appendix 4: Interim Sustainability Appraisal (SA) *(to follow for Full Council)*

Appendix 5: Interim Habitats Regulations Assessment (HRA) *(to follow for Full Council)*

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.
- 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.

Agenda item number: 9
Appendix 1

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: Schedule 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

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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

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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)¹ 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.

¹ 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 consultation². 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

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.

² 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 Cooperate³ 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.

³ 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

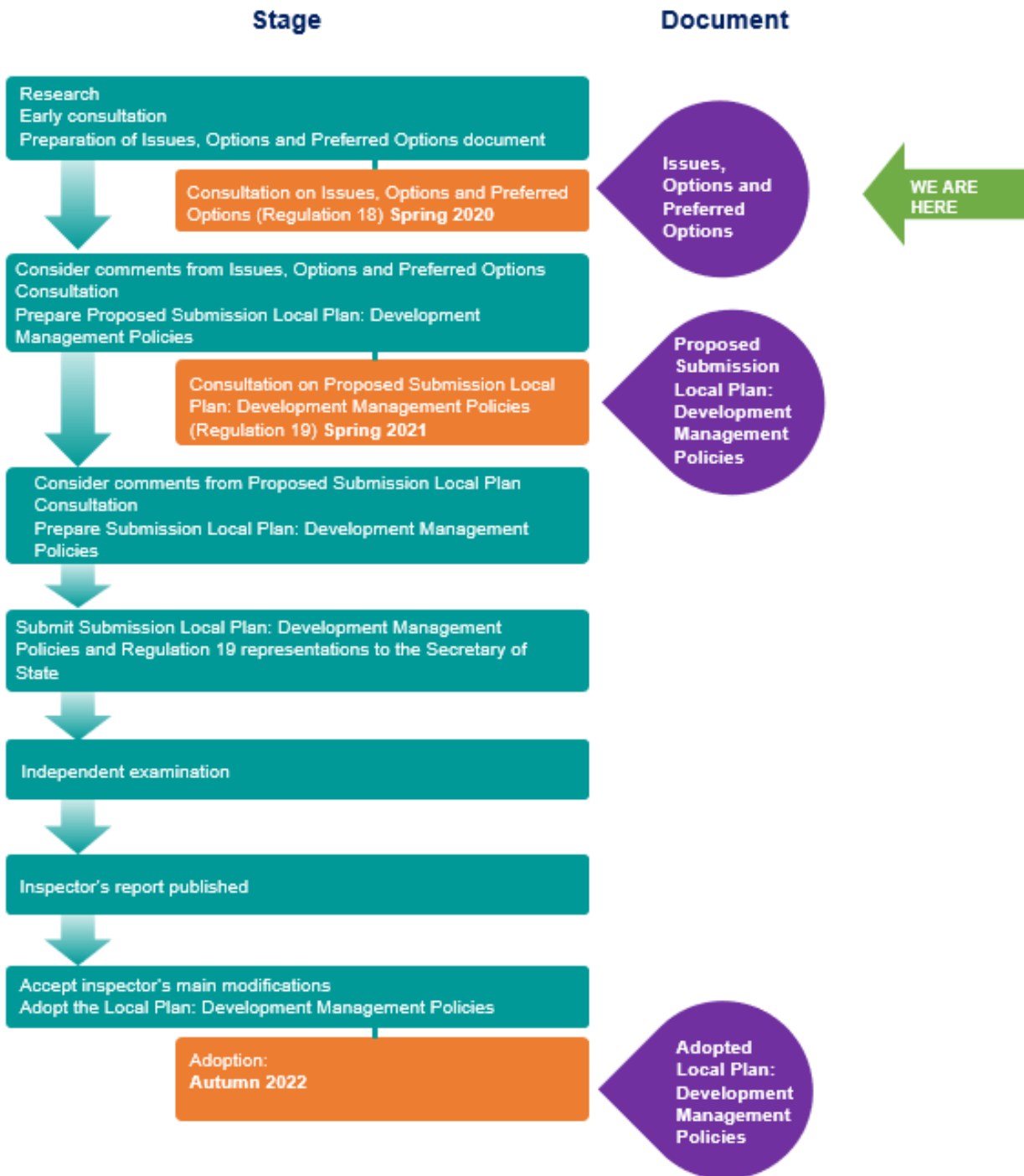
- 1.19 As part of the next stage, we will analyse all the responses we receive. Before drafting the development management policies, we will consider many factors such as public and specialist feedback on the issues, options and preferred options, evidence base, national policy & guidance and planning 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 Scheme⁴, available to view on the Council's website. This consultation is your opportunity to get involved in the early stages of policy formulation.

⁴ 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 densities⁵. 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

⁵ 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 identity⁶. 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.

⁶ 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 inappropriate⁷.

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.

⁷ 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 plan⁸ 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.

⁸ 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 NPPF⁹, 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.

Preferred option to 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">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">a) respect the existing context, scale and character of the adjacent buildings and immediate surrounding area,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, andc) are consistent with the form, scale, character and proportion of the existing building. <p>Basement extensions</p> <ol style="list-style-type: none">2) Proposals for basement extensions are required to:<ol style="list-style-type: none">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, andb) have no adverse impact on local ground water conditions, flooding or drainage issues. <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>

⁹ 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 accommodation¹⁰. 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?

¹⁰ 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 accommodation¹¹. 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?

¹¹ 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 145¹² and 146¹³.
- 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 legislation¹⁴ 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.

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

¹³ 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.

¹⁴ 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 LPSS¹⁵. 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 expand¹⁶.
- 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.

¹⁵ 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) and Guildford Borough Local Plan: Strategy and Sites 2015 – 20134, Policy E5, paragraph 4.4.55.

¹⁶ *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 NPPF¹⁷.
- 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:

¹⁷ 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 Sites¹⁸ 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.

¹⁸ 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)¹⁹ 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

¹⁹ 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.

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 gardens²⁰. 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 involved²¹. 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.

²⁰ 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).

²¹ 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 coexist²². 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 extinction²³. The extinction rate currently may be 100 times higher than that 'normally' experienced over evolutionary time²⁴. 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 extinction²⁵.
- 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 migration²⁶. 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.

²² UN Convention on Biological Diversity.

²³ UN Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services 2019.

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

²⁵ State of Nature 2019: Summary for England (State of Nature Partnership, 2019).

²⁶ 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"²⁷ 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.

²⁷ Available online at: 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 flow²⁸. 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.

²⁸ 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 Infrastructure²⁹ 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)³⁰ and Local Nature Reserves (LNR)³¹, 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)³² for Surrey sets out the broad actions required to achieve and maintain healthy natural assets in Surrey over the next 25 years.

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

³⁰ 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

³¹ LNRs are designated through national legislation but decisions on designation are taken locally.

³² 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)³³.
- 4.22 The Environment Agency is the prime agency responsible for water habitat and has produced the Thames Basin River Management Plan³⁴ 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 2018³⁵ 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

³³ Available at: https://surreynaturepartnership.files.wordpress.com/2019/10/boas_the-basis-for-realising-surreye28099s-ecological-network_synp_sept_2019.pdf

³⁴ 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>.

³⁵ 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.

- 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 cent³⁶ 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 interests³⁷.
- 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 asthma³⁸.
- 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 bodies³⁹.

³⁶ 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/>.

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

³⁸ 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>.

³⁹ 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 trees⁴⁰, 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.

⁴⁰ 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 impacts⁴¹. 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 sites⁴² 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)⁴³.

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

⁴² 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).

⁴³ 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 Statement⁴⁴ 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.

⁴⁴ 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 government⁴⁵ 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.

⁴⁵ 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.

- 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 Guidance⁴⁶ 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 assessment⁴⁷ (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)

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

⁴⁷ 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

- 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 value⁴⁸.
- 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.

⁴⁸ 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 context⁴⁹.
- 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.

⁴⁹ 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 advice⁵⁰ 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.

⁵⁰ 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'⁵¹.

⁵¹ 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 hedgerows⁵² 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).

⁵² 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 Reserves⁵³, 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 Surrey⁵⁴. 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’⁵⁵. Many of these are found on protected sites, often within locally designated SNCIs, but some species populations will inevitably remain beyond designated sites.

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

⁵⁴ 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.

⁵⁵ 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 land⁵⁶.

- 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)⁵⁷.

- 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 assessments⁵⁸.

- 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.

⁵⁶ NPPF Paragraph 118.

⁵⁷ NPPF Paragraph 178.

⁵⁸ 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 application⁵⁹,
 - 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.

⁵⁹ 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 (NO₂). 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 area⁶⁰. If a local authority identifies noncompliance with national air quality objectives and there is relevant public exposure, then action must be taken⁶¹.
- 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 NO₂. 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 NO₂ 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 NO₂ within the AQMA since 2014. The road traffic emissions are the source of NO₂ in the area.

⁶⁰ 2018 Air Quality Annual Status Report (ASR).

⁶¹ 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 NO₂ of 40 µg/m³ 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 appliances⁶². In an attempt to reduce their overall CO₂ emissions and in response to incentives such as the Renewable Heat Incentive (RHI)⁶³ many local authorities are considering proposals for the installation of biomass boilers either for heat provision within their own estate or for CHP⁶⁴.
- 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 England⁶⁵ to assist with assessing individual planning applications for biomass and CHP⁶⁶ 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.

⁶² 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.

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

⁶⁴ 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>.

⁶⁵ 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.

⁶⁶ 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.

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)⁶⁷.

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?

⁶⁷ 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 2016⁶⁸, 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)⁶⁹ 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.

⁶⁸ 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.

⁶⁹ 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/Envirnment-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 pollution⁷⁰. 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 2015⁷¹. 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.

⁷⁰ 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.

⁷¹ 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.

- 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 CIRIA⁷² has produced a number of guidance documents⁷³ 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.

⁷² 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.

⁷³ 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 development⁷⁴, 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 systems⁷⁵.

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.

⁷⁴ 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.

⁷⁵ 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.

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 Plans⁷⁶.
- GPA 2 - Managing Significance in Decision-Taking in the Historic Environment⁷⁷.
- Historic England – Places Strategy.
- Heritage: the foundation for success.
- Good Practice Advice Note: The Setting of Heritage Assets (GPA 3)⁷⁸.
- Building in Context⁷⁹.

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

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

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

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

⁷⁹ 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)⁸⁰.*
- 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 completed⁸¹.*
- 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 scheme⁸². Further guidance on the 'agent of change' principle is also set out in Planning Practice Guidance⁸³.
- 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.

⁸⁰ NPPF Paragraph 182.

⁸¹ NPPF Paragraph 182.

⁸² PPG Paragraph 009. Reference ID: 30-009-20190722.

⁸³ 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 Guidance⁸⁴ 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 Hierarchy⁸⁵. 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.

⁸⁴ See PPG: Paragraph 010 Reference ID: 30-010-20190722.

⁸⁵ Available at:

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 development⁸⁶. 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.

⁸⁶ 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 exists⁸⁷, 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 internally⁸⁸, 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.

⁸⁷ 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

⁸⁸ 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 Guidance⁸⁹, 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.

⁸⁹ 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 ecosystems⁹⁰. 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 privately⁹¹.

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.

⁹⁰ 5th Annual Report, Intergovernmental Panel on Climate Change (2014).

⁹¹ 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)⁹² 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.

⁹² 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 2020⁹³. 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.

⁹³ 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, regulations⁹⁴ 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.

⁹⁴ 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 approach⁹⁵ 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.

⁹⁵ 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)⁹⁶.

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.

⁹⁶ 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 worsen⁹⁷, the issue is not being adequately addressed at present⁹⁸. 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.

⁹⁷ 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/>).

⁹⁸ 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 Tongham⁹⁹, 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.

⁹⁹ 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 advice¹⁰⁰, and
 - h) the use of permeable ground surfaces wherever possible.

¹⁰⁰ 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 development¹⁰¹. 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 environment¹⁰².

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 generations¹⁰³.

¹⁰¹ NPPF 2018, Para 8, part c).

¹⁰² NPPF 2018, Para 20.

¹⁰³ 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 place¹⁰⁴.

5.140 There is also a clear prerequisite throughout the Framework that any harm or loss to a heritage asset requires clear and convincing justification¹⁰⁵.

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 setting¹⁰⁶.

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 policies¹⁰⁷.

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.

¹⁰⁴ NPPF 2018, Para 185.

¹⁰⁵ NPPF 2018, Para 186 – 202.

¹⁰⁶ NPPG Paragraph: 003 Reference ID: 18a-003-20190723.

¹⁰⁷ NPPG Paragraph: 003 Reference ID: 18a-003-20190723.

- The Ancient Monuments and Archaeological Areas Act 1979¹⁰⁸ 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 Plans¹⁰⁹ (2015)
- GPA2: Managing Significance in Decision Taking in the Historic Environment¹¹⁰ (2015)
- GPA3: The Setting of Heritage Assets¹¹¹ (2017)
- Conservation Principles, Policies, and Guidance for the Sustainable Management of Historic Environment¹¹² (2008)
- Making Changes to Heritage Assets: Historic England Advice Note 2¹¹³ (2016)
- Conservation Area Appraisal, Designation and Management: Historic England Advice Note 1¹¹⁴ (2019)
- Listed Buildings and Curtilage: Historic England Advice Note 10¹¹⁵ (2018)
- Local Heritage Listing: Historic England Advice Note 7¹¹⁶ (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,

¹⁰⁸ Ancient Monuments and Archaeological Areas Act 1979. Available online at: http://www.legislation.gov.uk/ukpga/1979/46/pdfs/ukpga_19790046_en.pdf.

¹⁰⁹ <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>.

¹¹⁰ <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>.

¹¹¹ <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

¹¹² <https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/>.

¹¹³ <https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>.

¹¹⁴ <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>.

¹¹⁵ <https://historicengland.org.uk/images-books/publications/listed-buildings-and-curtilage-advice-note-10/>.

¹¹⁶ <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 Appraisals¹¹⁷ (Guildford Borough Council)
- Neighbourhood Plans¹¹⁸ (Guildford Borough Council)
- Landscape Character Assessment¹¹⁹ (Guildford Borough Council, 2007)
- Historic Landscape Character Assessment (Surrey County Council, 2015)
- Surrey Historic Environment Record¹²⁰
- National Historic Environment Record¹²¹
- The National Heritage List for England¹²²

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.

¹¹⁷ 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>.

¹¹⁸ Adopted neighbourhood plans: - Burpham, Effingham, East Horsley, West Horsley - <https://www.guildford.gov.uk/neighbourhoodplanninginformation>.

¹¹⁹ <http://www.guildford.gov.uk/landscapescharacterassessment>.

¹²⁰ <https://www.surreycc.gov.uk/land-planning-and-development/historical-planning/historic-environment-record>.

¹²¹ <https://www.heritagegateway.org.uk/gateway/CHR/>.

¹²² <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 Register¹²³ 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.

¹²³ 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
Statutory Listed Buildings	10971*
Grade I	34
Grade II*	41
Grade II	1022
Conservation Areas	40
Article 4 Directions	8
Scheduled Monuments	32
Registered Parks and Gardens	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 achieved¹²⁴.

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 flora¹²⁵.

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.

¹²⁴ Historic England (2008) *Enabling Development and the Conservation of Significant Places*, para. 1.1.1.

¹²⁵ 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 benefits¹²⁶.

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?

¹²⁶ 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 advisor¹²⁷. 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.

¹²⁷ 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 flora¹²⁸.

Public Benefit:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF¹²⁹.

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 neutral¹³⁰.

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 significance¹³¹.

Question 28:

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

Do you have any other comments or suggestions?

¹²⁸ NPPF Annex 2: Glossary.

¹²⁹ PPG Paragraph: 020 Reference ID: 18a-020-20190723.

¹³⁰ NPPF Annex 2: Glossary.

¹³¹ 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 statute¹³² 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

¹³² 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 borough¹³³. 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.

¹³³ 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 building¹³⁴.

Conservation Area:

An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance¹³⁵.

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 contribution¹³⁶.

¹³⁴ https://www.planningportal.co.uk/directory_record/117/article_4_direction.

¹³⁵ Section 69(1) (a) Planning (Listed Building and Conservation Areas) Act 1990

¹³⁶ 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 flora¹³⁷.

Public Benefit:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF¹³⁸.

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 neutral¹³⁹.

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 significance¹⁴⁰.

Question 29:

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

Do you have any other comments or suggestions?

¹³⁷ NPPF Annex 2: Glossary.

¹³⁸ PPG Paragraph: 020 Reference ID: 18a-020-20190723.

¹³⁹ NPPF Annex 2: Glossary.

¹⁴⁰ 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 flora¹⁴¹.

Public Benefit:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF¹⁴².

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 neutral¹⁴³.

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 significance¹⁴⁴.

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?

¹⁴¹ NPPF Annex 2: Glossary.

¹⁴² PPG Paragraph: 020 Reference ID: 18a-020-20190723.

¹⁴³ NPPF Annex 2: Glossary.

¹⁴⁴ 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 Guidance¹⁴⁵.
- 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.

¹⁴⁵ 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)¹⁴⁶.

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 flora¹⁴⁷.

¹⁴⁶ NPPF Annex 2: Glossary.

¹⁴⁷ 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 assets¹⁴⁸.

Public Benefit:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF¹⁴⁹.

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 neutral¹⁵⁰.

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 significance¹⁵¹.

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?

¹⁴⁸ NPPG Paragraph: 040 Reference ID: 18a-040-20190723.

¹⁴⁹ PPG Paragraph: 020 Reference ID: 18a-020-20190723.

¹⁵⁰ NPPF Annex 2: Glossary.

¹⁵¹ 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 NPPF¹⁵² 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.

¹⁵² 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)¹⁵³. 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 Standards¹⁵⁴ (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.

¹⁵³ 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.

¹⁵⁴ 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 developments¹⁵⁵.

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.

¹⁵⁵ 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) ¹⁵⁶
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

¹⁵⁶ 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 mobility¹⁵⁷. 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 development¹⁵⁸ 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.

¹⁵⁷ Whilst acknowledging the distinct operating needs and locational requirements of certain facilities such as the provision of emergency services, and other specialised facilities.

¹⁵⁸ 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 facility¹⁵⁹.
- 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;

¹⁵⁹ 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 years¹⁶⁰ 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%)¹⁶¹. The South East has been the second hardest hit UK region after the North West for pub closures¹⁶². 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 pubs¹⁶³.
- 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 ACVs¹⁶⁴. 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.

¹⁶⁰ Source: <https://www.historic-uk.com/CultureUK/The-Great-British-Pub/>

¹⁶¹ Source: Office for National Statistics data, November 2018
(<https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/articles/economiesofalesmallpubscloseaschainsfocusonbigbars/2018-11-26>)

¹⁶² Source: CAMRA

¹⁶³ 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)

¹⁶⁴ 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.

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 legislation¹⁶⁵ 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 development¹⁶⁶). The 2017 order also introduced a new permitted development right¹⁶⁷ 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 market¹⁶⁸. 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.

¹⁶⁵ The Town and Country Planning (General Permitted Development) (England) (Amendment) (No 2) Order 2017.

¹⁶⁶ 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.

¹⁶⁷ Under Schedule 2, Part 3, Class AA of the GDPO 2015 (As amended).

¹⁶⁸ 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).

- 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)¹⁶⁹ 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.

¹⁶⁹ 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' webpage¹⁷⁰ 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.

¹⁷⁰ 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 2019¹⁷¹ 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.

¹⁷¹ 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

Size of residential dwelling	Studio Apartment	1 bedroom	2 bedroom	3 or more bedrooms
<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

Size of residential dwelling	Studio Apartment	1 bedroom	2 bedroom	3 or more bedrooms
<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 ² GFA)
A1 Retail	
<i>Food or non-food retail e.g.: small parades of shops serving the local community (up to 500m²)*</i>	1 car space per 30m ²
<i>Food retail (500 m² to 1000m²)*</i>	1 space per 25m ²
<i>Food retail (above 1000m²)*</i>	1 car space per 14m ²
<i>Non-food retail (500m² or more)*</i>	1 space per 25m ²
<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%
A3 Food and drink	
Restaurants, snack bars and cafés. For sale & consumption on the premises (if located beyond Town Centre locations).	1 car space per 6m ² No parking in town centres
A4 Drinking establishments	
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
A5 Hot Food Takeaways	
For sale & consumption of hot food off the premises (if located beyond Town Centre locations).	1 car space per 6m ² No parking in town centres
B1 Business	
Offices, research & development, light industry appropriate in a residential area – threshold of 2500m ²	A maximum range of 1 car space per 30m ² to 1 car space per 100m ² depending on location
B2 General Industrial	
General industrial use	1 car space per 30m ²

B8 Storage/distribution (including open air storage)	
Warehouse – storage	1 car space per 100m ² 1 lorry space per 200m ²
Warehouse – distribution	1 car space per 70m ² 1 lorry space per 200m ²
Cash and carry	1 car space per 70m ² 1 lorry space per 200m ²
C1 Hotels	
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
C2 Residential Institutions	
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
C3 Dwelling houses (family houses, up to 6 residents living as a single household, including households where care is provided)	
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
D1 Non-residential institutions	
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 ² 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 ² 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).
D2 Assembly and leisure	
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 ² 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
Other uses	
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 ² OR Individual assessment/justification
Car sales establishments	1 car space per 50m ² car display area OR Individual assessment/justification
Exhaust and tyre centres	1 car space per 0.3-0.5 bays OR Individual assessment/justification
Sui Generis and all other uses not mentioned above	
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
A1 Retail	
<i>Food retail</i>	1 space per 350m ² (out of centre) 1 space per 125m ² (town/local centre)
<i>Non-food retail</i>	1 space per 1500m ² (out of centre) with minimum 4 spaces 1 space per 300m ² (town/local centre)
<i>Garden Centre (can also be classed under sui generis)</i>	1 space per 300m ² (min 2 spaces)
<i>All other retail uses</i>	Individual assessment
A3 Food and drink	
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
A4 Drinking establishments	
Public houses, wine bars or other drinking establishments but not nightclubs (if located beyond Town Centre locations).	1 space per 100m ² (min 2 spaces), town centre parking not necessarily required
A5 Hot Food Takeaways	
For sale & consumption of hot food off the premises (if located beyond Town Centre locations).	1 space per 50m ² (min 2 spaces), town centre parking not necessarily required
B1 Business	
Offices	1 space per 125m ² (min 2 spaces)
Research & development / light industry	1 space per 125m ² (min 2 spaces)
B2 General Industrial	1 space per 500m ² (min 2 spaces)
B8 Storage/distribution (including open air storage)	1 space per 500m ² (min 2 spaces)
C1 Hotels/Guest houses	Individual assessment
C2 Residential Institutions	
Care home/Nursing home	Individual assessment
Hospitals	Individual assessment
Residential colleges	1 space per 2 students 1 space per 2staff
Training centres	Individual assessment

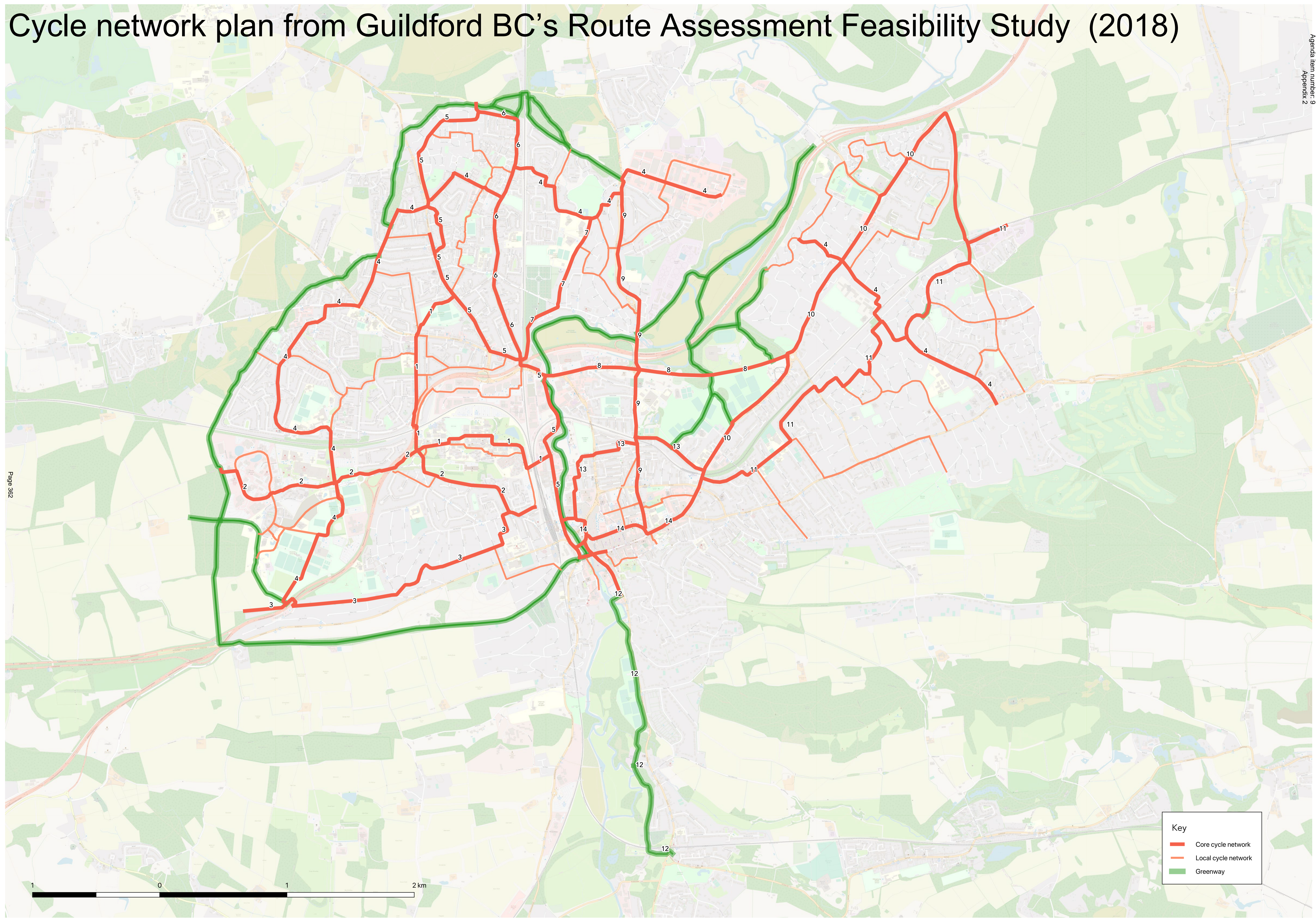
C3 Dwelling houses (family houses, up to 6 residents living as a single household, including households where care is provided)	
Flats / houses with garages and/or gardens: 1 and 2 bedroom unit 3 or more bedroom unit	1 space 2 spaces
Flats / houses without garages or gardens: 1 and 2 bedroom unit 3 or more bedroom unit	1 space 2 spaces
D1 Non-residential institutions	
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).
D2 Assembly and leisure	
Sui Generis and all other uses not mentioned above	Individual assessment

Table 7: Residential and non-residential development across the whole of Guildford borough
– Provision of electric vehicle charging

Residential Development	EV Charging Requirement	Charge Point Specification	Power Requirement
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
Commercial Development (Offices / Employment / Retail / Leisure Uses)	EV Charging Requirement	Charge Point Specification	Power Requirement
B1 Offices, light Industry >500m ² B2 General Industrial >500m ² B8 Storage & Distribution >1000m ² D1 Doctors/Dentists practices D1 Schools/Colleges A1 Retail >500m ² C1 Hotels D2 Sports Clubs, Health Clubs, Leisure Centres, Theatres, Cinemas, Conference Centres, >500m ²	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
Sui Generis Uses	EV Charging Requirement	Charge Point Specification	Power Requirement
(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)

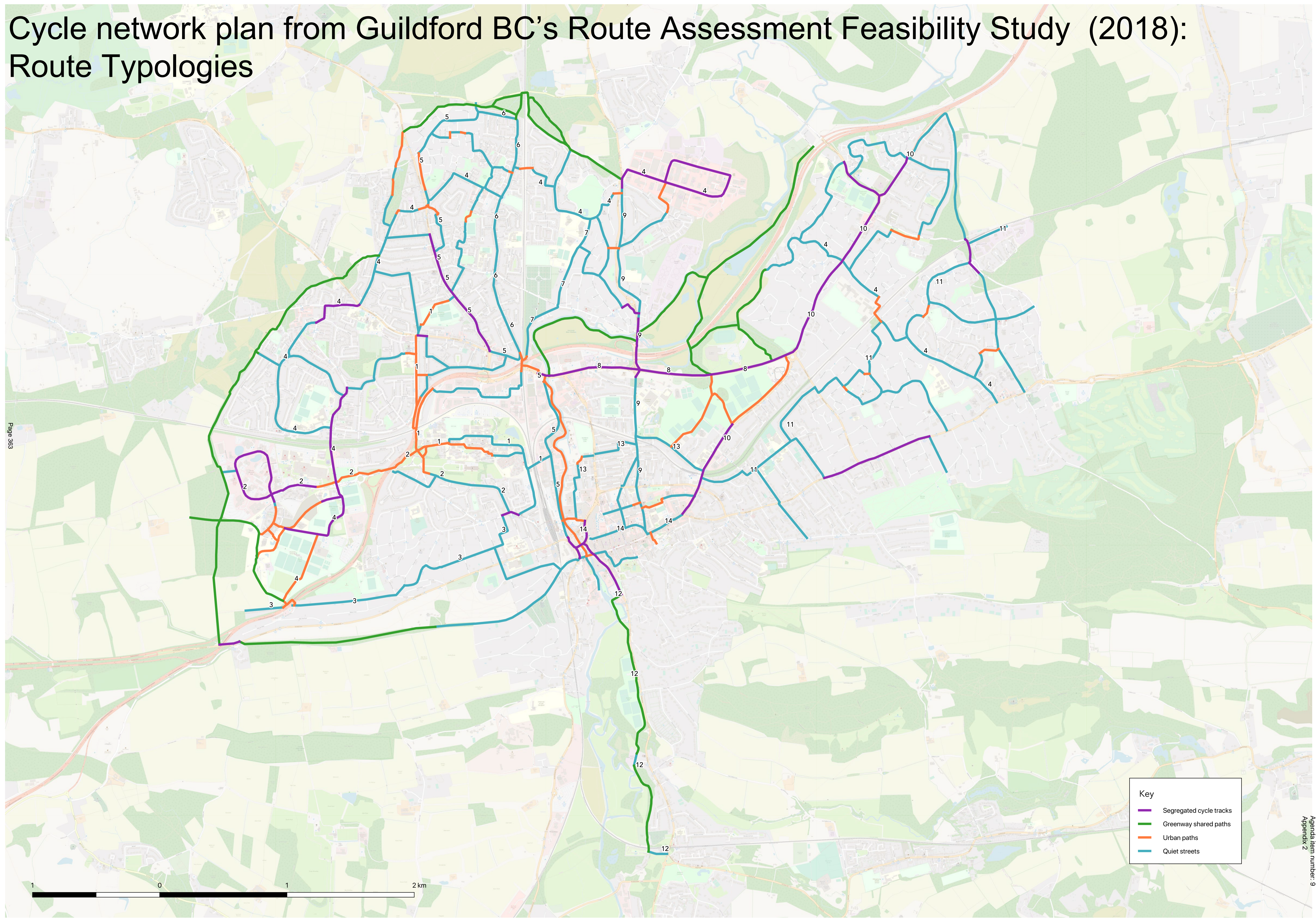


Key

- Core cycle network
- Local cycle network
- Greenway

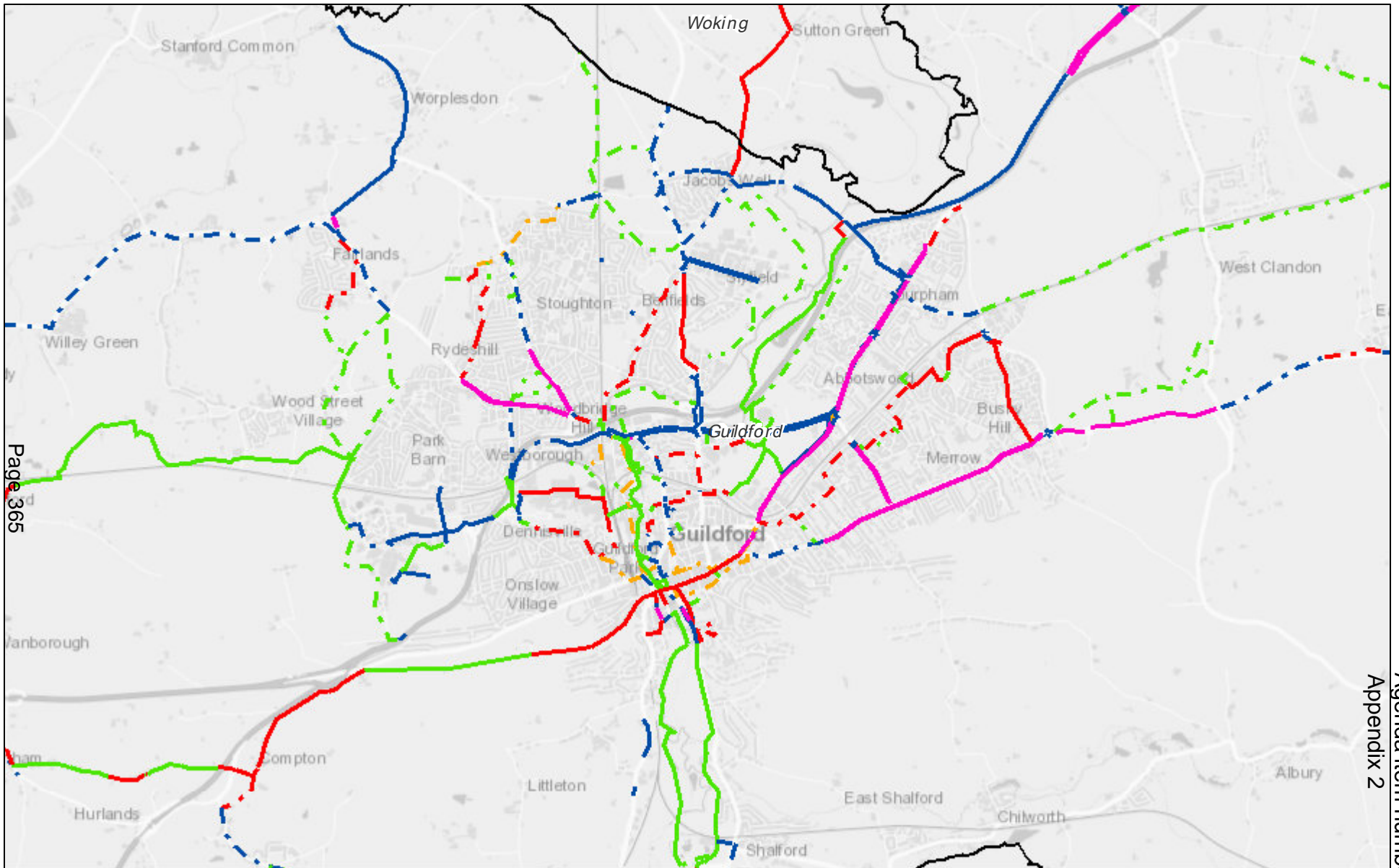


Cycle network plan from Guildford BC's Route Assessment Feasibility Study (2018): Route Typologies



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]

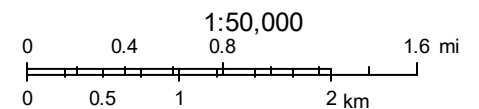


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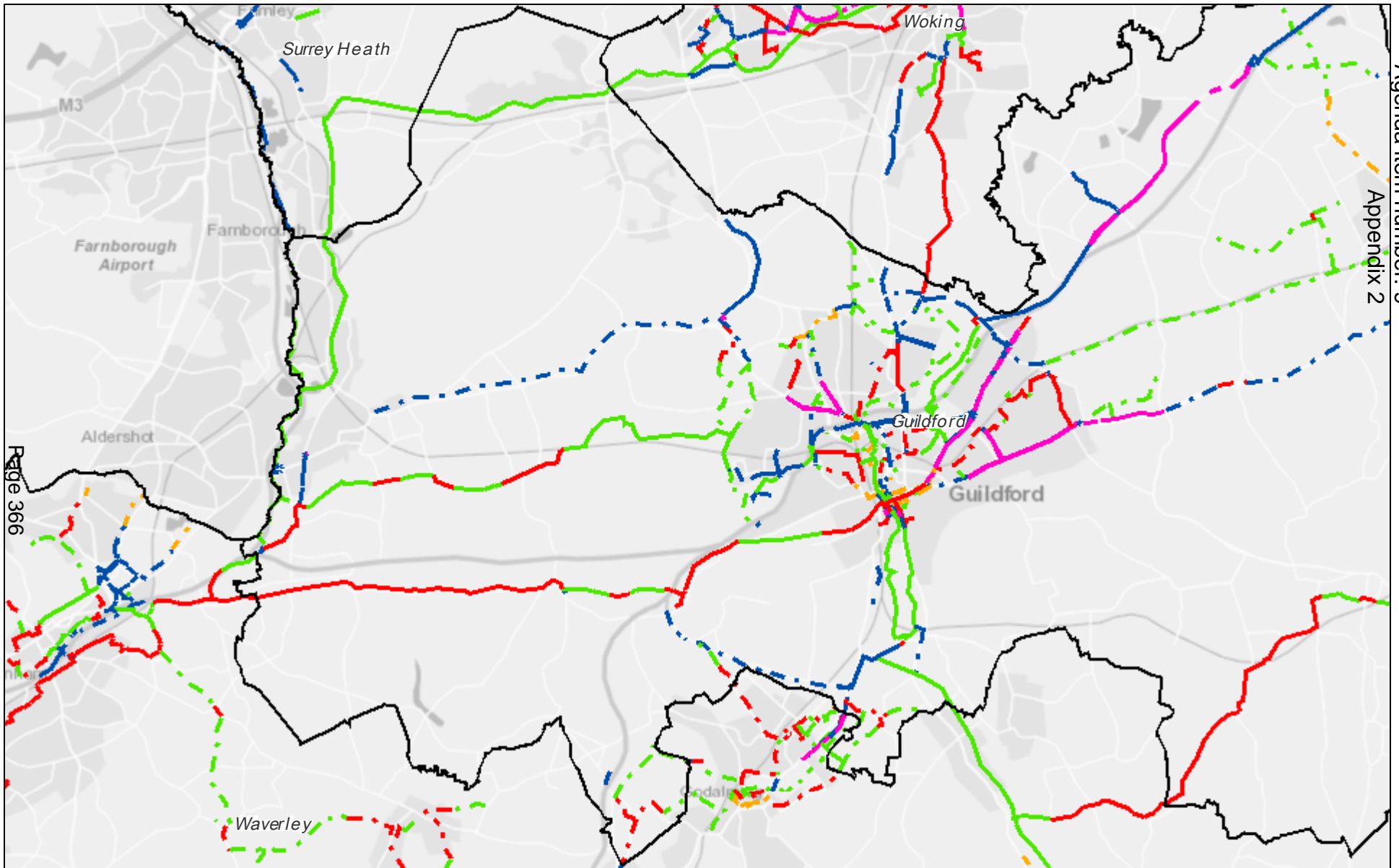
December 6, 2017

- | | | |
|---------------------------------|-------------------------|-----------------------------------|
| District and Borough Boundaries | Signed advisory route | Greenway |
| Existing Routes | Cycle lane | Signed advisory route |
| Cycle track | Suggested Routes | Cycle-friendly traffic management |
| Greenway | Cycle track | |



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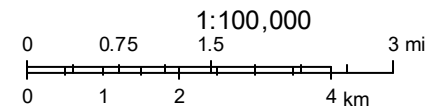
Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated) [Accessed 6/12/2017]



Agenda item number: 9
Appendix 2

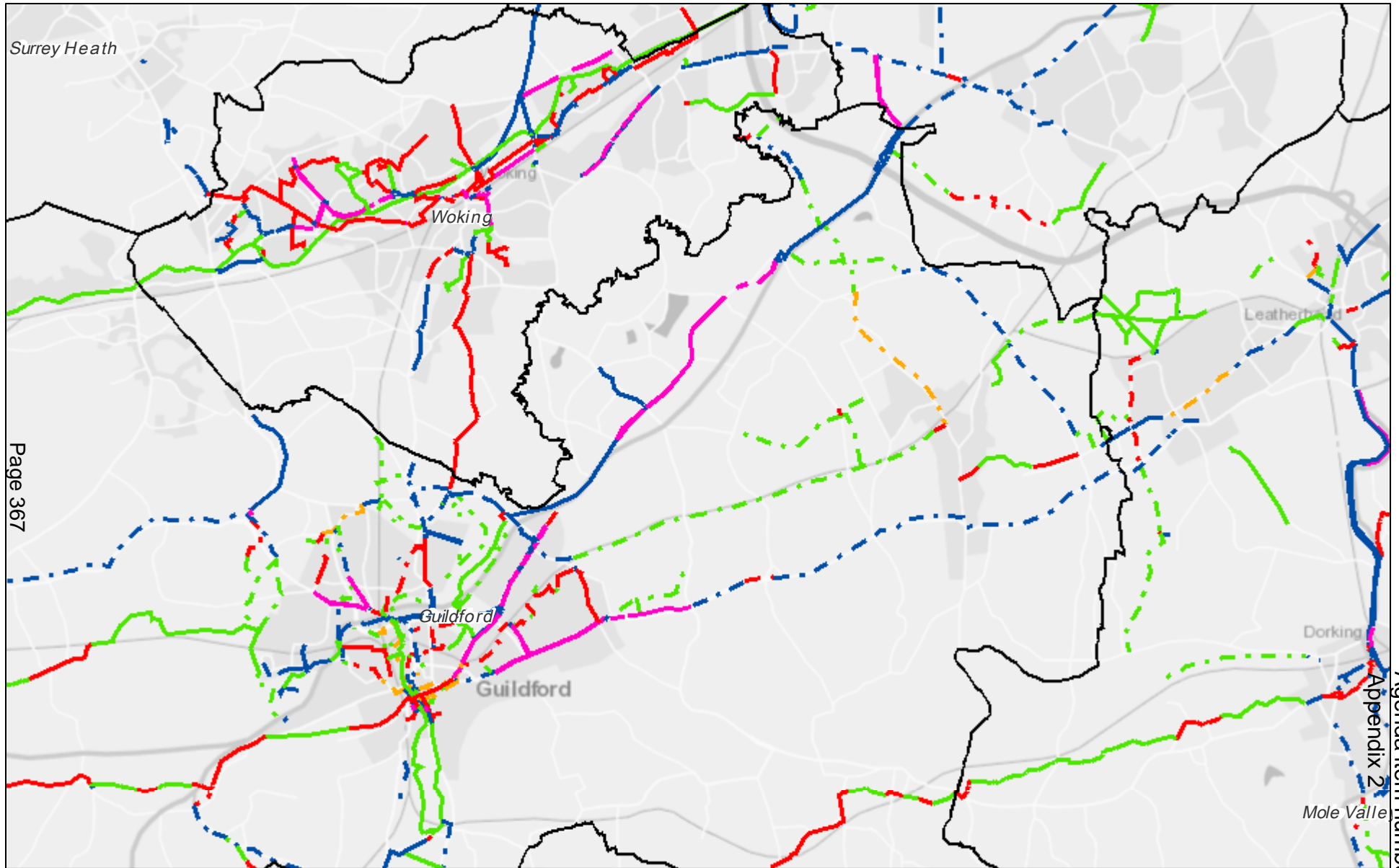
December 6, 2017

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| District and Borough Boundaries | — Signed advisory route | - - - Greenway |
| Existing Routes | — Cycle lane | - - - Signed advisory route |
| — Cycle track | Suggested Routes | - - - Cycle-friendly traffic management |
| — Greenway | - - - Cycle track | |



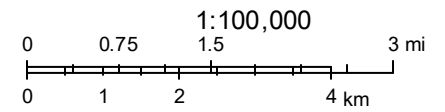
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Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated) [Accessed 6/12/2017]



December 6, 2017

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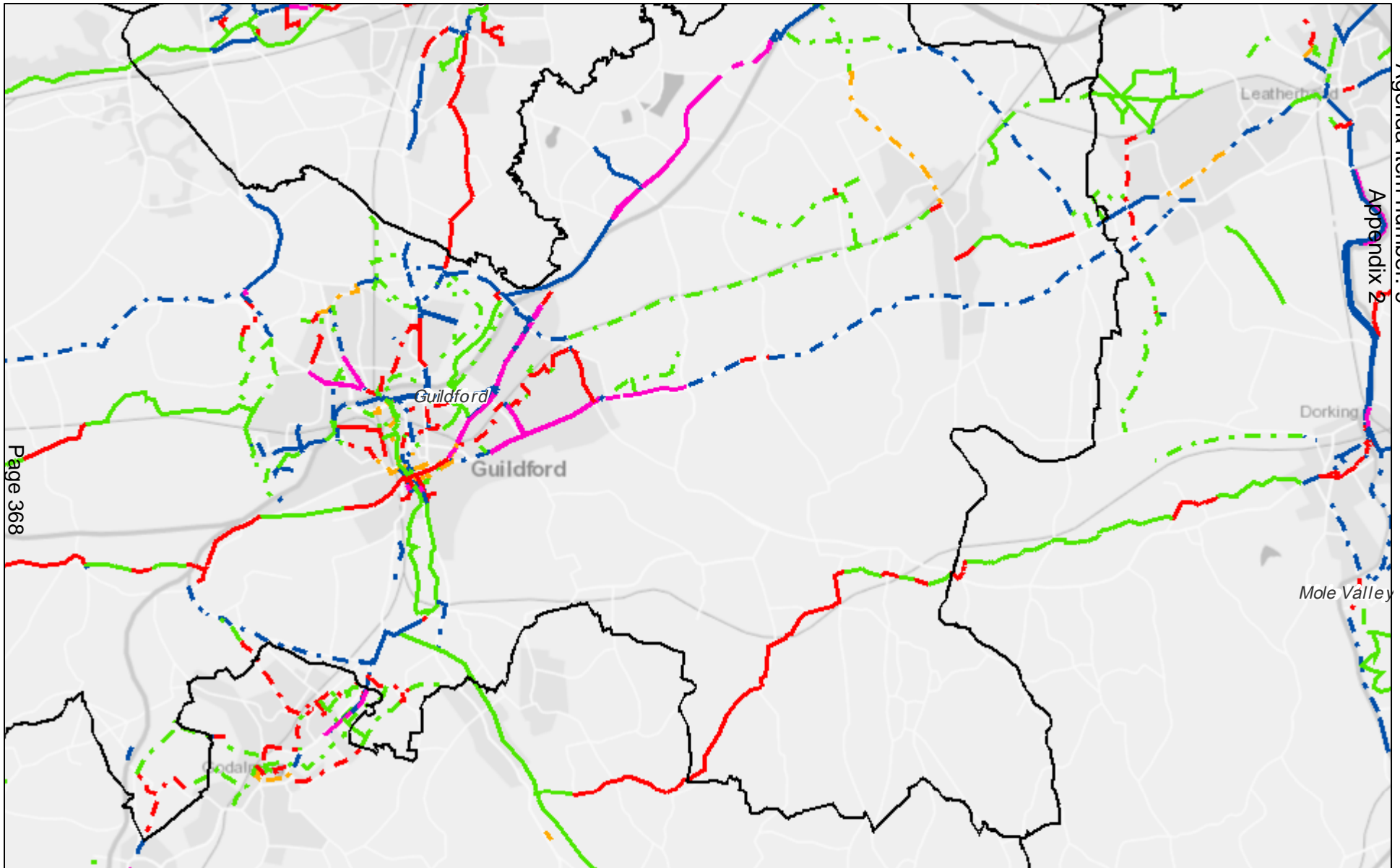


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Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated) [Accessed 6/12/2017]

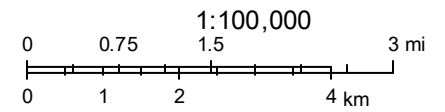


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Appendix 2

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December 6, 2017

- | | | |
|---------------------------------|-------------------------|-----------------------------------|
| District and Borough Boundaries | Signed advisory route | Greenway |
| Existing Routes | Cycle lane | Signed advisory route |
| Cycle track | Suggested Routes | Cycle-friendly traffic management |
| Greenway | Cycle track | |



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Executive Report

Ward(s) affected: Friary & St Nicolas and Holy Trinity.

Report of Managing Director of Guildford Borough Council.

Author: Andrew Tyldesley. Town Centre Development Lead.

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Lead Councillor responsible: John Rigg

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Date: 24 March 2020

Town Centre Masterplan

Executive Summary

This report is in response to the Council's resolution in Minute No. C029 made 23 July 2019:

CO29 NOTICE OF MOTION - TOWN CENTRE MASTER PLANNING

In accordance with Council Procedure Rule 11, Councillor John Rigg proposed, and Councillor Tom Hunt seconded, the adoption of the following motion:

"The Council has acknowledged that town centre master planning was not part of the process of preparing the Local Plan - including putting in place a full, detailed land availability assessment of brownfield sites in the town centre - because that could have compromised the Local Plan itself and its objectives. The majority of Councillors were elected based on an explicit pledge to master plan the town. At the informal Placemaking EAB on Monday 1st July, there was a common call for a master plan for the town centre.

The Council therefore

RESOLVES: That the process for bringing forward, within the term of this Council, a sustainable Town Centre Master Plan Development Plan Document be commenced immediately, and the Director of Planning and Regeneration be authorised to engage external master-planning consultancy advice to assist in this process".

Following the debate on the motion, it was put to the vote and was carried.

The purpose of this report is to inform the Council of progress to date and to seek endorsement of the process for progressing the production of a constraint led pro-active delivery strategy for Guildford's town centre that fulfils the resolution. The first phase of the work our consultants may identify certain strategies that can then be agreed by the Council and implemented at an early stage. At the completion of the process, we will have a portfolio of additional projects to take forward the Council's corporate priorities as well as a Development Plan Document (DPD) or Supplementary Planning Document (SDP) that will be a formal planning document that will carry considerable weight when deciding planning

applications.

All of the above is designed to provide a desirable future Guildford for the community and businesses in the area.

Recommendation to Executive

The Executive is asked to endorse the process set out below by:

- (1) Setting up a Town Centre Masterplan Programme Board to be chaired by Councillor John Rigg.
- (2) Appointing a procurement specialist for 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.

Reason for Recommendation:

To support the implementation of the resolution in Council minute C029.

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

1. Purpose of the Report

- 1.1 It has been agreed that a new Town Centre Masterplan will be prepared. It is proposed that there will be a constraint led pro-active delivery strategy under the "Masterplan" heading that will include specific programmes of work identified and implemented by the multi-disciplinary team. They will take the lead on,
 - Flooding
 - Transportation (improving resilience and adding capacity).
 - Housing.
 - Environment
 - Social/Arts
- 1.2 To inform the Council of progress to date and to seek endorsement of the process for progressing the production of a constraint led pro-active delivery strategy for Guildford's town centre that fulfils the resolution.

2. Background and Key Issues

- 2.1 Following the adoption of the motion at full Council, Corporate Programmes made a bid in the 2020-21 budget for funding to undertake and procure a delivery led masterplan for the town centre. This was approved in the Council budget of 5 February for the sum of £500,000. Whilst we envisage the production of a masterplan including evidence base will be in excess of £2.0m we consider no more than £500,000 will be spent in the first year.

- 2.2 In line with the constraints of funding until budget approval for the new financial year we commissioned David Lock Associates to carry out a review of previous town centre studies and People and Places to talk to key Guildford stakeholders.
- 2.3 Subject to the advice that we receive from our project managers the process might be dealt with as a three-stage process:
1. The preparation of a constraint led pro-active delivery strategy, a detailed evidence base and an aspirational document. Previous Masterplans were only visionary in their content and did not address deliverability or developability of sites/proposals and therefore was not prepared in such a way that it could be used as the basis for preparing a DPD or SPD. Whilst giving some guidance to the future of the town centre they had no status as a planning document and therefore could not be a material consideration in determining town centre planning applications.
 2. Stage two will be a period of review and consideration of the advice that has been received to agree the next stages of the process. It may be in the Council's best interest to take a different approach, other than producing a DPD. Certainly, the advice will look at bringing forward various strategies for the town centre that can be implemented at this point and provide early wins.
 3. Stage 3 is production of the Town Centre Plan and a Delivery Programme and possibly the production of a DPD. If a DPD is required its production will be divided into three main sections, namely:
 - Regulation 18, Issue and Options. together with its procedure through consultation and committee stages.
 - Regulation 19, Document Production together with its procedure through consultation and committee stages.
 - Submission to Secretary of State for Examination including hearing sessions. Inspector's report is provided followed by formal adoption by the Council.
- 2.4 Addressing the regeneration and future development of the Town Centre is a complex matter. Results can be achieved by concerted and coordinated actions over time. There is a role for delivery/implementation, aspiration and long-term vision.
- 3. Work to date**
- 3.1 Some initial evaluation has already been undertaken by David Lock Associates to evaluate the previous masterplanning in relation to the town centre.
- 3.2 People and Places have consulted 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.

- 3.3 The Council is awaiting the Environment Agency (EA) in relation to a Flood Alleviation Scheme (FAS). The EA have prepared a preliminary Flood Alleviation Scheme that is currently being tested by the EA's new consultants. However, GBC's have relied upon the EA to advise and bring forward the FAS and little has been achieved in over three years. It is vitally important that as part of the process outlined that GBC and its consultants take control of this situation as the scale and implications of the alleviation work is likely to be significant and have major impact upon the masterplan.

4. Proposed Actions.

- 4.1 Set up a Town Centre Masterplan Programme Board. The board will agree upon and appoint an expert to prepare a brief for the appointment of a Project Management Consultancy.
- 4.2 Procure and appoint a Project Management Consultancy. The Board and PM will agree the terms of reference for the project to include the comprehensive planning and regeneration of Guildford town centre. Additional Consultancies will be appointed to deliver these specialist projects under the programmes of works as listed in but not limited to 2. above.
- 4.3 This process together with the evidence base will inform an aspirational document to explore the development potential of the Town Centre as well as enabling a number of projects to move towards the implementation stage.

5. Consultations

- 5.1 Councillor John Rigg who has portfolio responsibility for Corporate Programmes (that is leading on this project) recommends approval.
- 5.2 Councillor Jan Harwood, the Councillor responsible for Planning has been consulted and recommends approval.
- 5.3 No public consultations have taken place. Public consultation will be undertaken later as part of the masterplanning process.

6. Key Risks

- 6.1 Failure to prepare and implement a strategy for Guildford Town Centre is likely to lead to a decline in its attractiveness to residents, business and visitors/shoppers.
- 6.2 The Council has declared a Climate Emergency. An implementable strategy is required that will address the causes of this emergency and be part of a raft of actions that will be identified to start to reverse this situation.
- 6.3 Congestion in Guildford is a key issue to residents, businesses and visitors as well as contributing to the Climate Emergency. A plan needs to be prepared and implemented to deal with these issues.

- 6.4 Flooding is a major risk to residents and businesses. A clear strategy and implementable plan will be addressed through this process to alleviate this risk.
- 6.5 The Council has housing targets to meet. The risk of failing to meet targets will be reduced by having a clear strategy and implementable housing plan for the town centre that will be provided by this process.

7. Financial Implications

- 7.1 At its meeting on 5 February 2020 the Council agreed to fund a growth bid of £500,000 for the work described in this report as part of the Masterplan DPD process. Further annual budget allocation of £125,000 for 2021-22 and 2022-23 was also provisionally agreed but subject to final approval at the relevant budget meetings in February 2021 and 2022 to progress the DPD through to regulation 18 consultation. Any further progression of the masterplan beyond regulation 18 will need additional funding bids to be approved by Council for the relevant financial year.
- 7.2 Subject to the initial output of the masterplan process, a number of capital projects may be developed as part of an overall programme of development for the town centre. As these capital projects come forward, a capital bid for funding will be required to be submitted for approval by Council as part of its provisional capital programme. Where available, funding bids to external parties and government agencies may need to also be submitted for grant funding to aid the development of the projects.

8. Legal Implications

- 8.1 This report recommends that authority be given for the procurement and appointment of a consultancy to “lead on the delivery of a portfolio of projects that will together contribute to the comprehensive planning and regeneration of Guildford town centre, and to 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”.
- 8.2 A consultancy, therefore, is to be appointed to not only deliver the Masterplan, which may progress to the preparation of a town centre Development Planning Document, but also to take the lead as a master developer – assisting the Council in regeneration, land acquisition, and development delivery of works: the scope of this activity will need to be carefully assessed to ensure that the correct procurement approach is taken.
- 8.3 It is proposed that the consultancy will undertake work entailed in the preparation and production of a Development Planning Document that will contain policies that will form part of the Development Plan and inform the proper planning of Guildford Town Centre. The report outlines the procedures that are entailed in the preparation, consultation, examination and adoption of a Development Planning Document.

- 8.4 The terms of appointment of the consultancy should ensure that the consultants' work is informed by a full Equalities Impact Assessment so that the policies and or proposals in the proposed DPD are development in compliance with the Council's public sector equality duty enshrined in section 149 of the Equality Act 2010. In addition, the terms of appointment should require that the consultants ensure that the proposed DPD is prepared in accordance with the requirements of the National Planning Policy Framework and the Climate Change Act 2008 (as amended).
- 8.5 When procuring services and / or works in excess of the applicable thresholds for the procurement of services and / or works, the Council should adhere to the provisions of the Public Contract Regulations 2015 and the Council's Procurement Procedure Rules.

9. Human Resource Implications

- 9.1 There are no human resource implications arising from this report.

10. Equality and Diversity Implications

- 10.1 See legal implications above.

11. Climate Change/Sustainability Implications

- 11.1 The Council declared a climate emergency on 23 July 2019. Environmental impact will be taken into account throughout the process outlined above including:

- carbon emissions
- energy use
- waste / recycling
- air quality
- water supply/conservation
- flood / climate resilience
- procurement (economic, social and environmental, community well-being)
- biodiversity
- public health of communities
- collaboration with statutory partners, agencies and/or businesses to tackling climate change

12. Summary of Options

- 12.1 To endorse the recommendations in this report which will enable the commencement of the production of a constraint led pro-active delivery strategy for Guildford's town centre and help in achieving the objectives of Guildford's corporate plan.
- 12.2 To not agree the recommendation of this report thereby delaying the delivery of a strategy for the improvement of Guildford Town Centre.

13. Conclusion

- 13.1 Endorsing the proposed process for progressing the production on a constraint led pro-active delivery strategy will enable the start of the process to fulfil the Council's resolution C029. The early phases of the work may identify certain strategies that can be agreed by the council and implemented at an early stage. At the completion of the process, we will have a portfolio of additional projects to take forward GBC's corporate priorities as well a DPD or SPD that will be a formal planning document that will carry considerable weight when deciding planning applications.
- 13.2 All of the above is designed to provide a desirable future for the community and businesses in the area.

14. Background Papers

None

15. Appendices

Appendix 1: Town Centre Masterplan Area.
Appendix 2: Timeline.

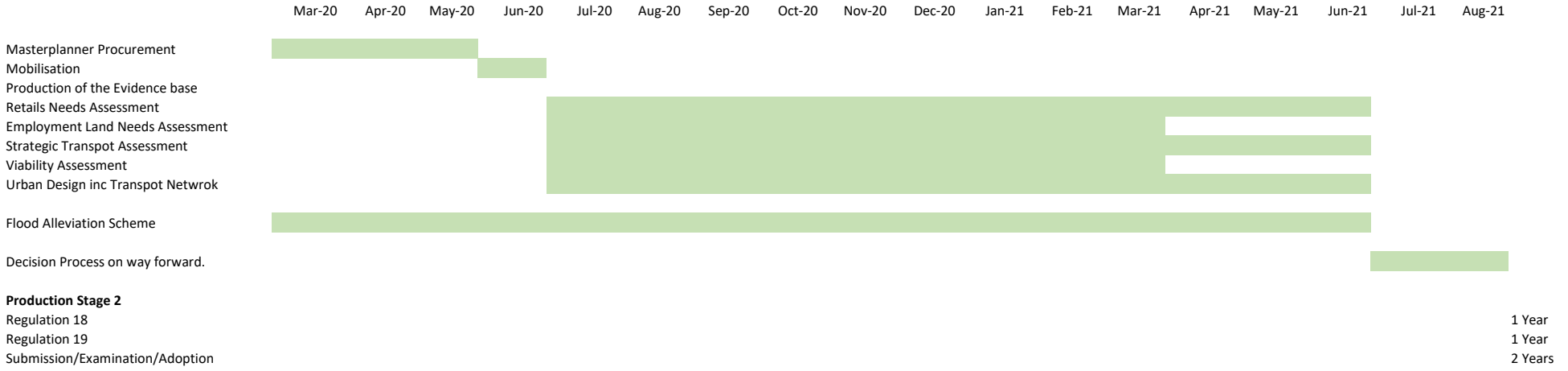
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Appendix 1. Anticipated Outline of “Town Centre Masterplan” area.



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Masterplan Timeline. Stage 1



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Executive Report

Ward(s) affected: n/a

Report of Director of Strategic Services

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Paperless Meetings

Executive Summary

Following consideration of a report at its last meeting on 18 February 2020, the Executive adopted a proposal to introduce paperless meetings, with effect from 7 April 2020 and on a trial basis for six months. The proposal involved the following:

- (1) That we 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.
- (2) That all officer level meetings shall be paperless.
- (3) 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.
- (4) That we provide in respect of each meeting to which the public would be entitled to attend:
 - (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.

The Executive also made a separate recommendation to Council to make a minor amendment to paragraph 1 (Scope) of the Access to Information Procedure Rules in Part 4 of the Constitution by the addition of the following:

“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.”

The reason for making this decision was 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.

Since that decision was taken, a number of councillors have raised concerns about the implications of its implementation. In the light of these concerns, the Leader of the Council has therefore asked that this matter be reconsidered by the Executive at this meeting.

Options:

Option A:

The Executive could confirm its decision taken on 18 February, although it is possible that the decision could be called-in for review by the Overview and Scrutiny Committee.

Option B:

The Executive could look at Option 3 in the 18 February report, which was as follows:

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.

If, in view of the various concerns expressed by some councillors, the Executive is minded to move to the "paper-light" approach, it is suggested that this option is clarified so that it reads:

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

This clarification emphasises that there is an initial presumption of paperless meetings, subject to the "opt in" provisions outlined above.

If the paper-light approach is to be pursued, the Executive will need to consider the extent to which it will apply to officers, Honorary Freeman and Aldermen, and co-opted members of committees.

Recommendation to Executive:

To reconsider, in the light of the concerns expressed by councillors, the Executive's decision taken on 18 February 2020 in respect of paperless meetings.

Recommendation to Council:

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 for Recommendation:

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.

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

1. Purpose of Report

1.1 The Leader of the Council has asked that the Executive reconsiders this matter at this meeting.

2. Strategic Priorities

2.1 Working towards a paperless environment will help the Council deliver on its strategic priorities of protecting our environment and using innovation, technology and new ways of working to improve value for money and efficiency in Council services.

3. Background

3.1 Following consideration of a report on paperless meetings at its last meeting on 18 February 2020, the Executive took the following decision:

(1) That, subject to paragraph (3) below and with effect from 7 April 2020,

(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.

3.2 The Executive also made a separate recommendation to Council to make a minor amendment to paragraph 1 (Scope) of the Access to Information Procedure Rules in Part 4 of the Constitution by the addition of the following:

“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.”

3.3 The reason for making this decision was 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.

4. Concerns expressed by some councillors following the decision

4.1 Since the Executive took the decision, a number of councillors have raised concerns about the implications of its implementation. These concerns can be summarised as follows:

- screen size of councillors’ laptops is too small and there are limits to what can be done with font-sizes when viewing documents. The laptop interface of is not flexible enough to manipulate documents while trying to make points and focus on the meeting.
- use of the laptop has contributed to a marked deterioration of eye-sight
- a number of councillors (and possibly staff), have medical conditions, including epilepsy and severe migraines, which do not allow prolonged looking at computer screens.
- councillors will have no choice but to print out those agendas and reports that they feel they need in a paper format, thus negating the drive for helping Guildford to become carbon neutral.
- not all councillors will wish to have every agenda or report in paper form, but they should be able to say which ones they need in paper copy. Savings, both in terms of money and carbon will still be made, but not at the expense of councillors’ eyesight and health.
- this decision has the potential to seriously impede councillors in doing the work they were elected to do

- concern that committee chairmen may not be able to effectively chair a meeting.
- the ICT Policy for Councillors, which references the objective of paperless meetings, provides that reasonable adjustments to the policy will be made to assist councillors in line with the Council's commitment to inclusivity and in compliance with the Equality Act 2010. A councillor has enquired as to the level of proof required for councillors to be granted exemption from being paperless.
- going paperless will be a particular problem for Planning Committee members, where they often need to refer to several pages from sometimes lengthy reports while speaking or listening to others.
- no prior consultation with councillors
- any change should initially be introduced on a voluntary basis with those still requiring hard copy agendas being able to pick them up from their pigeon-holes in advance
- reviewing documents on screens wastes so much time
- this rigid approach is impractical and undemocratic (the Executive should not be permitted to dictate to other councillors about working practices) and discriminates against the less computer literate
- no argument with moving towards paperless, but it has to be with flexibility and whilst not compromising the ability to effectively represent residents.

4.2 Some councillors have expressed a clear willingness to embrace the paperless environment, to the extent that one councillor has stated that he:

- brings his laptop to virtually every meeting that he is involved in as a councillor
- has not printed off a document since he was elected last May, and
- has elected not to receive hard copy agendas (with the exception of Planning Committee agendas)

4.3 In the light of these concerns, the Leader of the Council has therefore asked that this matter be reconsidered by the Executive at this meeting.

5. Summary of Options

5.1 Option A:

The Executive could confirm its decision taken on 18 February, although it is possible that the decision could be called-in for review by the Overview and Scrutiny Committee.

Option B:

The Executive could look at Option 3 in the 18 February report, which was as follows:

“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.”

5.2 If, in view of the various concerns expressed by some councillors, the Executive is minded to move to the “paper-light” approach, it is suggested that this option is clarified so that it reads:

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.**

5.3 This clarification emphasises that there is an initial presumption of paperless meetings, subject to the “opt in” provisions outlined above. However, it could be argued that there is actually very little practical difference between the “paperless” decision taken on 18 February and the “paper-light” approach outlined above. Under the “Paperless” approach, any councillor could request reasonable adjustments to be made in accordance with the adopted ICT Policy for Councillors, for example due to a medical condition, in line with the Council’s commitment to inclusivity and in compliance with the Equality Act 2010. A reasonable adjustment in this context could mean that the councillor requests to continue receiving hard copy agendas. Conceivably, a considerable number of councillors could ask for this. Based on the response from some councillors since the last meeting of the Executive, a similar number of councillors is likely to opt in under the “paper-light” approach.

5.4 If the paper-light approach is to be pursued, officers will canvass every councillor to establish their preferences. The Executive will also need to consider the extent to which it should apply to officers, Honorary Freeman and Aldermen, and co-opted members of committees.

6. Conclusion

6.1 In common with other councils, Guildford faces a number of significant challenges over the next few years particularly in respect of:

- (a) meeting our corporate responsibilities in addressing the climate emergency that we declared in July 2019, and
- (b) finding sufficient resources to continue to provide services that meet the needs of our residents.

6.2 The paperless meetings proposal approved by the Executive on 18 February 2020 would have contributed towards the delivery of ongoing savings in its revenue budget and assisted in achieving the Council’s corporate aspirations to reduce its carbon footprint.

6.3 The “paper-light” approach referred to in Option B (paragraph 5.2 above) will still make a contribution towards these aspirations but obviously to a lesser extent.

7. Background Papers

[Report to Executive – 18 February 2020: Paperless meetings \(Agenda Item 8\)](#)

8. Appendices

None

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