

Local Plan Part 2: Development Management Policies

Issues and Preferred Options Consultation

2020



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:

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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

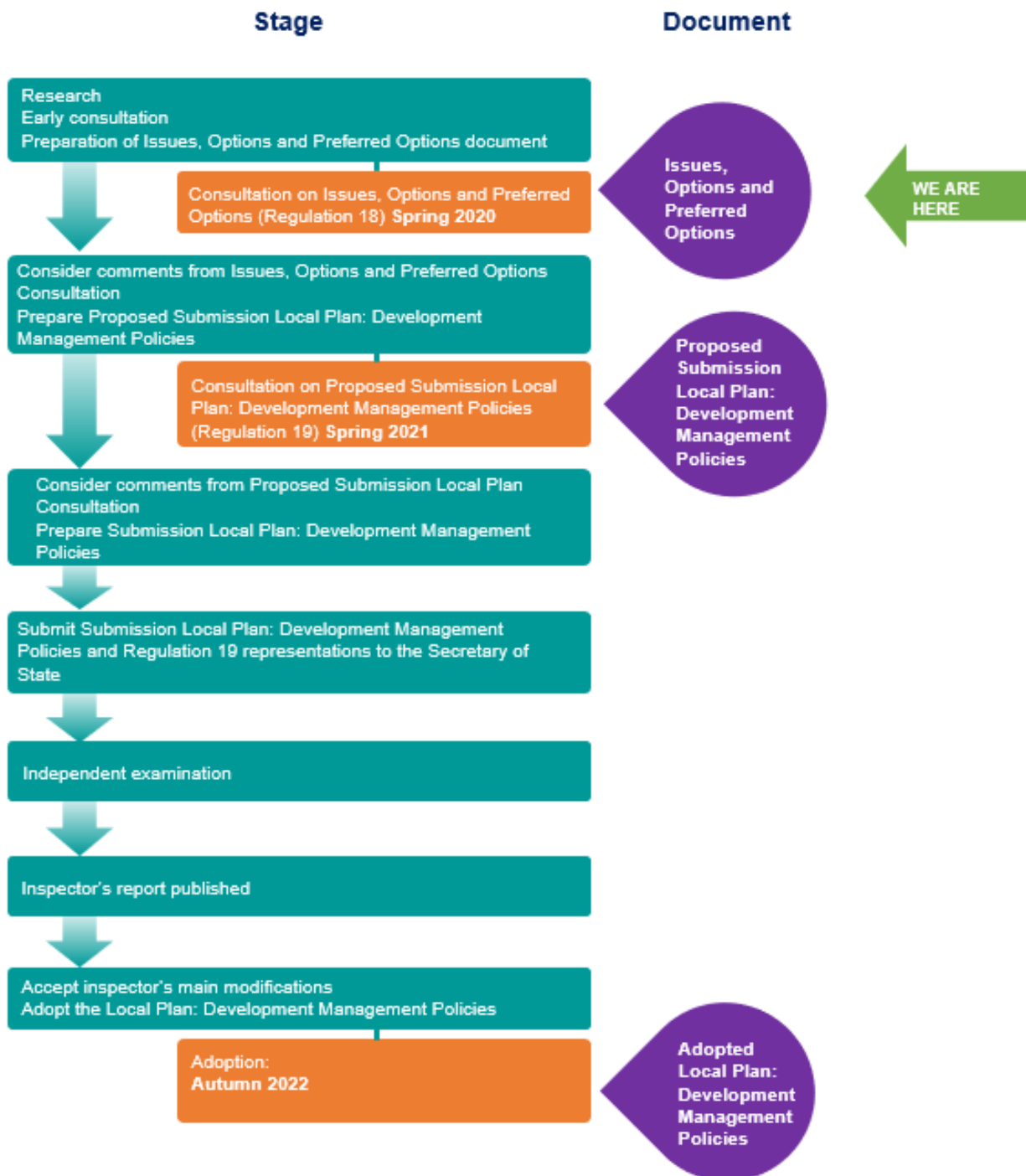
- 1.19 As part of the next stage, we will analyse all the responses we receive. Before drafting the development management policies, we will consider many factors such as public and specialist feedback on the issues, options and preferred options, evidence base, national policy & guidance and planning 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, villages and other areas that are well served by public transport, 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 density ranges across the borough. 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

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.

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.

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.

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?

⁸ Also as defined in the Guildford Borough Council Local Plan Strategy and Sites page 70.

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

For the purpose of this policy, the following definitions will apply:

- Extensions and alterations include roof extensions of dwellings.
- Subordinate is defined as smaller scale, subservient and dependant on the main dwelling, with a shared facility. It is not self-contained.
- A dwelling is defined (in line with the 2001 Census definition) as a self-contained unit of accommodation. 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.
- "An annex is defined as 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".

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?

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 in the table 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 Local Plan Strategy and Sites 2019.

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

For the purpose of this policy, the following definitions will apply:

- A dwelling is defined as 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.
- A household's accommodation is defined as being 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 subdivision 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>.

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 145¹¹ and 146¹².
- 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 legislation¹³ 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.

¹¹ Paragraph 145 (a) of the NPPF supersedes policy RE13 of the 2003 Plan in relation to agricultural buildings.

¹² 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.

¹³ 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 LPSS¹⁴. 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 expand¹⁵.
- 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.

¹⁴ 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 – 2034, Policy E5, paragraph 4.4.55.

¹⁵ *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, subject to passing the sequential and impact tests for main town centre uses in paragraphs 86-90 of the NPPF¹⁶.
- 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:

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 Sites¹⁷ for non-Green Belt sites.

¹⁶ 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).

¹⁷ 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.

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.

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.

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)¹⁸ 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

¹⁸ 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 gardens¹⁹. 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 involved²⁰. 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.

¹⁹ 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).

²⁰ 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 coexist²¹. 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 extinction²². The extinction rate currently may be 100 times higher than that 'normally' experienced over evolutionary time²³. 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 extinction²⁴.
- 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 migration²⁵. 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.

²¹ UN Convention on Biological Diversity.

²² UN Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services 2019.

²³ The misunderstood sixth mass extinction, Ceballos, G. and Ehrlich, P. (2018).

²⁴ State of Nature 2019: Summary for England (State of Nature Partnership, 2019).

²⁵ 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"²⁶ 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.

²⁶ 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 flow²⁷. 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 benefits 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 kilograms 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.

²⁷ 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 Infrastructure²⁸ 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)²⁹ and Local Nature Reserves (LNR)³⁰, 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)³¹ for Surrey sets out the broad actions required to achieve and maintain healthy natural assets in Surrey over the next 25 years.

²⁸ Natural England (2009) Natural England's Green Infrastructure Guidance (NE176). Available online at: <http://publications.naturalengland.org.uk/publication/35033>

²⁹ 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

³⁰ LNRs are designated through national legislation but decisions on designation are taken locally.

³¹ 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)³².
- 4.22 The Environment Agency is the prime agency responsible for water habitat and has produced the Thames Basin River Management Plan³³ 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 2018³⁴ 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

³² Available at: https://surreynaturepartnership.files.wordpress.com/2019/10/boas_the-basis-for-realising-surreye28099s-ecological-network_synp_sept_2019.pdf

³³ 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>.

³⁴ 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 value.
- 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 cent³⁵ 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 interests³⁶.
- 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 asthma³⁷.
- 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 bodies³⁸.

³⁵ 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/>.

³⁶ Tree planting for climate change mitigation in Surrey: a Surrey Nature Partnership Position Statement (SyNP 2020).

³⁷ 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>.

³⁸ 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 trees³⁹, 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.

³⁹ 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 impacts⁴⁰. 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 (see **Error! Reference source not found.**) to set the strategic approach to biodiversity recovery across the borough and identifies a network of nationally and locally protected designated sites⁴¹ 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)⁴².

⁴⁰ Great Britain Non-native species strategy (Non-Native Species Secretariat, 2015). Available online at: <http://www.nonnativespecies.org/index.cfm?sectionid=55>.

⁴¹ 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).

⁴² 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 Statement⁴³ 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.

⁴³ 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 government⁴⁴ 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.

⁴⁴ 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 Guidance⁴⁵ 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 assessment⁴⁶ (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)

⁴⁵ HM Government (2019) Guidance Natural environment. Available online at: <https://www.gov.uk/guidance/natural-environment>.

⁴⁶ 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 (see chapter introduction **Error! Reference source not found.**). 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 value⁴⁷.
- 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.

⁴⁷ 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>).

- 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.

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 context⁴⁸.
- 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.

⁴⁸ 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 advice⁴⁹ 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.

⁴⁹ <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'⁵⁰.

⁵⁰ 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 hedgerows⁵¹ 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).

⁵¹ 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 Reserves⁵², 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 Surrey⁵³. 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’⁵⁴. Many of these are found on protected sites, often within locally designated SNCIs, but some species populations will inevitably remain beyond designated sites.

⁵² Local Nature Reserves are designated through national legislation but decisions on designation are taken locally.

⁵³ 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.

⁵⁴ 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 land⁵⁵.

- 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)⁵⁶.

- 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 assessments⁵⁷.

- 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.

⁵⁵ NPPF Paragraph 118.

⁵⁶ NPPF Paragraph 178.

⁵⁷ 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 application⁵⁸,
 - 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.

⁵⁸ 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

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.

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

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.

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 area⁵⁹. If a local authority identifies noncompliance with national air quality objectives and there is relevant public exposure then action must be taken⁶⁰.
- 4.119 There are currently two Air Quality Management Areas (AQMA) 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.

⁵⁹ 2018 Air Quality Annual Status Report (ASR).

⁶⁰ 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 appliances⁶¹. In an attempt to reduce their overall CO₂ emissions and in response to incentives such as the Renewable Heat Incentive (RHI)⁶² many local authorities are considering proposals for the installation of biomass boilers either for heat provision within their own estate or for CHP⁶³.
- 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 England⁶⁴ to assist with assessing individual planning applications for biomass and CHP⁶⁵ 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.

⁶¹ 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.

⁶² Ofgem (2018) About the Domestic RHI. Available online at <https://www.ofgem.gov.uk/environmental-programmes/domestic-rhi/about-domestic-rhi>.

⁶³ 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>.

⁶⁴ 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.

⁶⁵ 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)⁶⁶.

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?

⁶⁶ 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 2016⁶⁷, 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)⁶⁸ 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.

⁶⁷ 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.

⁶⁸ 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 pollution⁶⁹. 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 2015⁷⁰. 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.

⁶⁹ 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.

⁷⁰ 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 CIRIA⁷¹ has produced a number of guidance documents⁷² 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.

⁷¹ 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.

⁷² 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 development⁷³, 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 systems⁷⁴.

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.

⁷³ 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.

⁷⁴ 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 and the Historic Environment

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 Plans⁷⁵.
- GPA 2 - Managing Significance in Decision-Taking in the Historic Environment⁷⁶.
- Historic England – Places Strategy.
- Heritage: the foundation for success.
- Good Practice Advice Note: The Setting of Heritage Assets (GPA 3)⁷⁷.
- Building in Context⁷⁸.

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

⁷⁵ Available online at: <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/gpa1/>.

⁷⁶ Available online at: <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/>.

⁷⁷ Available online at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>.

⁷⁸ 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)⁷⁹.*
- 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 completed⁸⁰.*
- 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 scheme⁸¹. Further guidance on the 'agent of change' principle is also set out in Planning Practice Guidance⁸².
- 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.

⁷⁹ NPPF Paragraph 182.

⁸⁰ NPPF Paragraph 182.

⁸¹ PPG Paragraph 009. Reference ID: 30-009-20190722.

⁸² 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 Guidance⁸³ 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 Hierarchy⁸⁴. 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.

⁸³ See PPG: Paragraph 010 Reference ID: 30-010-20190722.

⁸⁴ 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 development⁸⁵. 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.

⁸⁵ 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 exists⁸⁶, the applicant must demonstrate how the proposed development will be designed and implemented in order to;
 - f) Prevent any present and very disruptive Significant Observed Adverse Effect levels,
 - g) Avoid any present and disruptive Significant Observed Adverse Effects, and
 - h) 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 internally⁸⁷, 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.

⁸⁶ 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

⁸⁷ 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 Guidance⁸⁸, 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.

⁸⁸ 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

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.

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.

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 ecosystems⁸⁹. 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 privately⁹⁰.

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.

⁸⁹ 5th Annual Report, Intergovernmental Panel on Climate Change (2014).

⁹⁰ 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)⁹¹ 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.

⁹¹ 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 2020⁹². 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.

⁹² 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 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, regulations⁹³ 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.

⁹³ 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 approach⁹⁴ 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.

⁹⁴ 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)⁹⁵.

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.

⁹⁵ 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 worsen⁹⁶, the issue is not being adequately addressed at present⁹⁷. 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.

⁹⁶ 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/>).

⁹⁷ 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 Tongham⁹⁸, 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.

⁹⁸ 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 advice⁹⁹, and
 - h) the use of permeable ground surfaces wherever possible.

⁹⁹ 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 achievability of these measures may depend on access to low carbon heating networks and the availability of carbon offsetting schemes.
- 5.121 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.
- 5.122 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.
- 5.123 If a higher 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

- 5.124 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

- 5.125 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.
- 5.126 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.
- 5.127 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).
- 5.128 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”.
- 5.129 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.
- 5.130 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

- 5.131 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

- 5.132 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.

- 5.133 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.

- 5.134 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

- 5.135 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

5.136 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

5.137 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)

5.138 The National Planning Policy Framework (NPPF) is very clear that the historic environment is a fundamental component to successfully achieving sustainable development¹⁰⁰. 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 environment¹⁰¹.

5.139 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 generations¹⁰².

¹⁰⁰ NPPF 2018, Para 8, part c).

¹⁰¹ NPPF 2018, Para 20.

¹⁰² NPPF 2018, Para 184.

5.140 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 place¹⁰³.

5.141 There is also a clear prerequisite throughout the Framework that any harm or loss to a heritage asset requires clear and convincing justification¹⁰⁴.

National Planning Practice Guidance (NPPG, 2014)

5.142 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 setting¹⁰⁵.

5.143 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 policies¹⁰⁶.

Legislative Framework

5.144 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.

¹⁰³ NPPF 2018, Para 185.

¹⁰⁴ NPPF 2018, Para 186 – 202.

¹⁰⁵ NPPG Paragraph: 003 Reference ID: 18a-003-20190723.

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

- The Ancient Monuments and Archaeological Areas Act 1979¹⁰⁷ 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

5.145 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 Plans¹⁰⁸ (2015)
- GPA2: Managing Significance in Decision Taking in the Historic Environment¹⁰⁹ (2015)
- GPA3: The Setting of Heritage Assets¹¹⁰ (2017)
- Conservation Principles, Policies, and Guidance for the Sustainable Management of Historic Environment¹¹¹ (2008)
- Making Changes to Heritage Assets: Historic England Advice Note 2¹¹² (2016)
- Conservation Area Appraisal, Designation and Management: Historic England Advice Note 1¹¹³ (2019)
- Listed Buildings and Curtilage: Historic England Advice Note 10¹¹⁴ (2018)
- Local Heritage Listing: Historic England Advice Note 7¹¹⁵ (2016)

Local strategies and evidence

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

5.146 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,

¹⁰⁷ Ancient Monuments and Archaeological Areas Act 1979. Available online at: http://www.legislation.gov.uk/ukpga/1979/46/pdfs/ukpga_19790046_en.pdf.

¹⁰⁸ <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>.

¹⁰⁹ <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/>.

¹¹⁰ <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

¹¹¹ <https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/>.

¹¹² <https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>.

¹¹³ <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>.

¹¹⁴ <https://historicengland.org.uk/images-books/publications/listed-buildings-and-curtilage-advice-note-10/>.

¹¹⁵ <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 Appraisals¹¹⁶ (Guildford Borough Council)
- Neighbourhood Plans¹¹⁷ (Guildford Borough Council)
- Landscape Character Assessment¹¹⁸ (Guildford Borough Council, 2007)
- Historic Landscape Character Assessment (Surrey County Council, 2015)
- Surrey Historic Environment Record¹¹⁹
- National Historic Environment Record¹²⁰
- The National Heritage List for England¹²¹

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.

¹¹⁶ 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>.

¹¹⁷ Adopted neighbourhood plans: - Burpham, Effingham, East Horsley, West Horsley - <https://www.guildford.gov.uk/neighbourhoodplanninginformation>.

¹¹⁸ <http://www.guildford.gov.uk/landscapescharacterassessment>.

¹¹⁹ <https://www.surreycc.gov.uk/land-planning-and-development/historical-planning/historic-environment-record>.

¹²⁰ <https://www.heritagegateway.org.uk/gateway/CHR/>.

¹²¹ <https://historicengland.org.uk/listing/the-list/>.

Issues

- 5.147 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:

- 5.148 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.
- 5.149 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:

- 5.150 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.
- 5.151 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:

- 5.152 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 Register¹²² 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.

¹²² <https://historicengland.org.uk/advice/heritage-at-risk/search-register/>

5.153 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:

5.154 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:

5.155 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:

5.156 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

- 5.157 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.
- 5.158 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.
- 5.159 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

- 5.160 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.
- 5.161 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.

5.162 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

5.163 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.

5.164 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.

5.165 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.

- 5.166 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'.
- 5.167 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

5.168 For the purpose of this policy, the following definitions will apply:

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 flora¹²³.

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.

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.

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.

¹²³ 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 benefits¹²⁴.

Enabling Development:

Enabling development is defined as 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 achieved¹²⁵.

Question 27:

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

Do you have any other comments or suggestions?

¹²⁴ PPG Paragraph: 020 Reference ID: 18a-020-20190723.

¹²⁵ Historic England (2008) *Enabling Development and the Conservation of Significant Places*, para. 1.1.1.

Topic - Listed Buildings

Listed Buildings

- 5.169 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 advisor¹²⁶. 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.
- 5.170 The designation mechanism is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 5.171 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*.
- 5.172 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.
- 5.173 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.
- 5.174 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.
- 5.175 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.

¹²⁶ Available online at: <https://historicengland.org.uk/listing/the-list>.

- 5.176 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.
- 5.177 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.
- 5.178 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

5.179 For the purpose of this policy, the following definitions will apply:

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 flora¹²⁷.

Public Benefit:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF¹²⁸.

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 neutral¹²⁹.

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 significance¹³⁰.

Question 28:

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

Do you have any other comments or suggestions?

¹²⁷ NPPF Annex 2: Glossary.

¹²⁸ PPG Paragraph: 020 Reference ID: 18a-020-20190723.

¹²⁹ NPPF Annex 2: Glossary.

¹³⁰ NPPF Annex 2: Glossary.

Topic - Conservation Areas

Conservation Areas

- 5.180 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.
- 5.181 The local planning authority is required by statute¹³¹ 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.
- 5.182 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

¹³¹ 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

- 5.183 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.
- 5.184 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.
- 5.185 The Authority has also introduced Article 4 Directions on domestic properties within 8 of the designated Conservation Areas within the borough¹³². 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.
- 5.186 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.

¹³² 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

5.187 For the purpose of this policy, the following definitions will apply:

Article 4 Direction:

Direction removing some or all permitted development rights, for example within a conservation area or curtilage of a listed building¹³³.

Conservation Area:

An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance¹³⁴.

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 contribution¹³⁵.

¹³³ https://www.planningportal.co.uk/directory_record/117/article_4_direction.

¹³⁴ Section 69(1) (a) Planning (Listed Building and Conservation Areas) Act 1990

¹³⁵ 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 flora¹³⁶.

Public Benefit:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF¹³⁷.

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 neutral¹³⁸.

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 significance¹³⁹.

Question 29:

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

Do you have any other comments or suggestions?

¹³⁶ NPPF Annex 2: Glossary.

¹³⁷ PPG Paragraph: 020 Reference ID: 18a-020-20190723.

¹³⁸ NPPF Annex 2: Glossary.

¹³⁹ NPPF Annex 2: Glossary.

Topic - Scheduled Monuments & Registered Parks and Gardens

Scheduled Monuments

5.188 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.

5.189 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.

5.190 It is illegal to undertake any works within an area designated as part of the monument without gaining Scheduled Monument Consent, this includes repairs.

5.191 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.

5.192 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.

5.193 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

5.194 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.

5.195 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.

5.196 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.

5.197 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

5.198 For the purpose of this policy, the following definitions will apply:

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 flora¹⁴⁰.

Public Benefit:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF¹⁴¹.

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 neutral¹⁴².

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 significance¹⁴³.

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?

¹⁴⁰ NPPF Annex 2: Glossary.

¹⁴¹ PPG Paragraph: 020 Reference ID: 18a-020-20190723.

¹⁴² NPPF Annex 2: Glossary.

¹⁴³ NPPF Annex 2: Glossary.

Topic - Non-Designated Heritage Assets

- 5.199 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.
- 5.200 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 Guidance¹⁴⁴.
- 5.201 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
- 5.202 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

- 5.203 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.
- 5.204 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.

¹⁴⁴ Department for Communities and Local Government (2014) 'National Planning Practice Guidance, Conserving and Enhancing the Historic Environment, Para 039'.

5.205 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

5.206 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.

5.207 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.

5.208 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)

- 5.209 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.
- 5.210 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.
- 5.211 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.
- 5.212 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.
- 5.213 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)¹⁴⁵.

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 flora¹⁴⁶.

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 assets¹⁴⁷.

¹⁴⁵ NPPF Annex 2: Glossary.

¹⁴⁶ NPPF Annex 2: Glossary.

¹⁴⁷ NPPG Paragraph: 040 Reference ID: 18a-040-20190723.

Public Benefit:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF¹⁴⁸.

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 neutral¹⁴⁹.

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 significance¹⁵⁰.

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

¹⁴⁹ NPPF Annex 2: Glossary.

¹⁵⁰ NPPF Annex 2: Glossary.

Chapter 6: Infrastructure

Open Space, Sport and Recreation Policies

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 NPPF¹⁵¹ 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.

¹⁵¹ 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)¹⁵². 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 Standards¹⁵³ (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.

¹⁵² 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.

¹⁵³ 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 developments¹⁵⁴.

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.

¹⁵⁴ 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) ¹⁵⁵
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

¹⁵⁵ 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 mobility¹⁵⁶. 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 development¹⁵⁷ 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.

¹⁵⁶ Whilst acknowledging the distinct operating needs and locational requirements of certain facilities such as the provision of emergency services, and other specialised facilities.

¹⁵⁷ 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 facility¹⁵⁸.
- 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;

¹⁵⁸ 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 years¹⁵⁹ 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%)¹⁶⁰. The South East has been the second hardest hit UK region after the North West for pub closures¹⁶¹. 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 pubs¹⁶².
- 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 ACVs¹⁶³. 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.

¹⁵⁹ Source: <https://www.historic-uk.com/CultureUK/The-Great-British-Pub/>

¹⁶⁰ Source: Office for National Statistics data, November 2018
(<https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/articles/economiesofalesmallpubscloseaschainsfocusonbigbars/2018-11-26>)

¹⁶¹ Source: CAMRA

¹⁶² 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)

¹⁶³ 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 legislation¹⁶⁴ 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 development¹⁶⁵). The 2017 order also introduced a new permitted development right¹⁶⁶ 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 market¹⁶⁷. 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.

¹⁶⁴ The Town and Country Planning (General Permitted Development) (England) (Amendment) (No 2) Order 2017.

¹⁶⁵ 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.

¹⁶⁶ Under Schedule 2, Part 3, Class AA of the GDPO 2015 (As amended).

¹⁶⁷ 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)¹⁶⁸ 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.

¹⁶⁸ 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' webpage¹⁶⁹ 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.

¹⁶⁹ 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 2019¹⁷⁰ 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.

¹⁷⁰ 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.

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

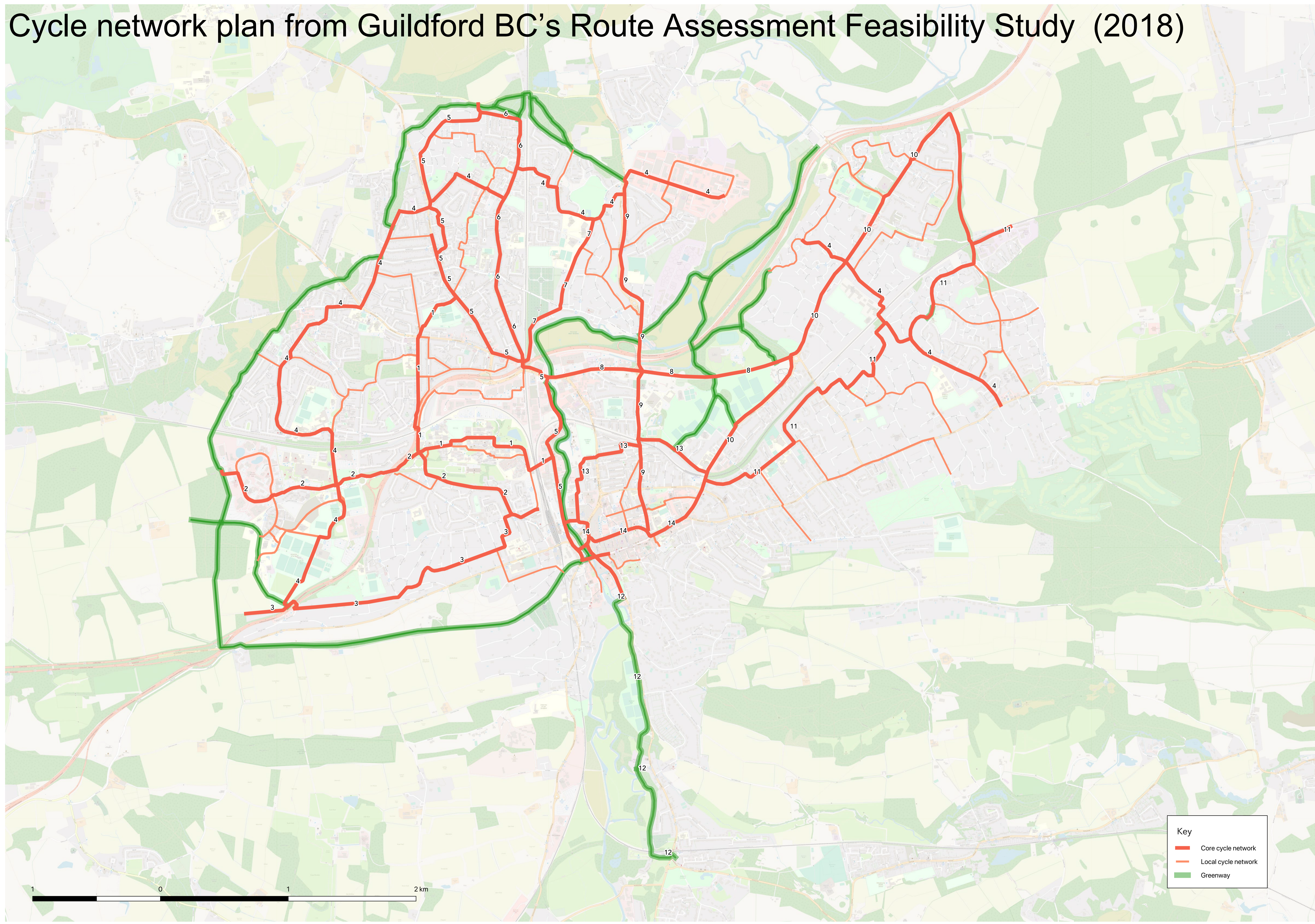
C3 Dwelling houses (family houses, up to 6 residents living as a single household, including households where care is provided)	
Flats / houses with garages and/or gardens: 1 and 2 bedroom unit 3 or more bedroom unit	1 space 2 spaces
Flats / houses without garages or gardens: 1 and 2 bedroom unit 3 or 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)

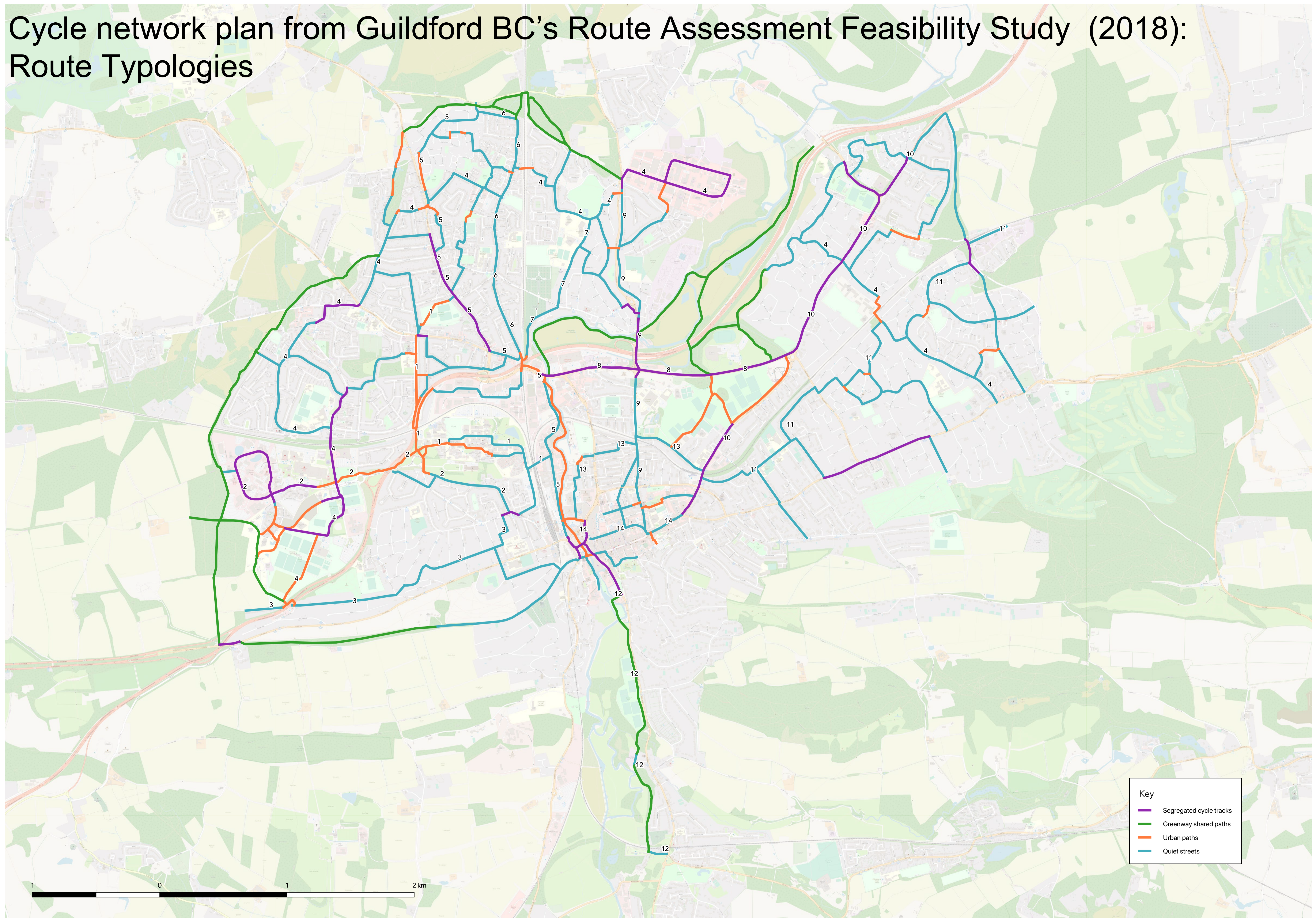


Key

- Core cycle network
- Local cycle network
- Greenway



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



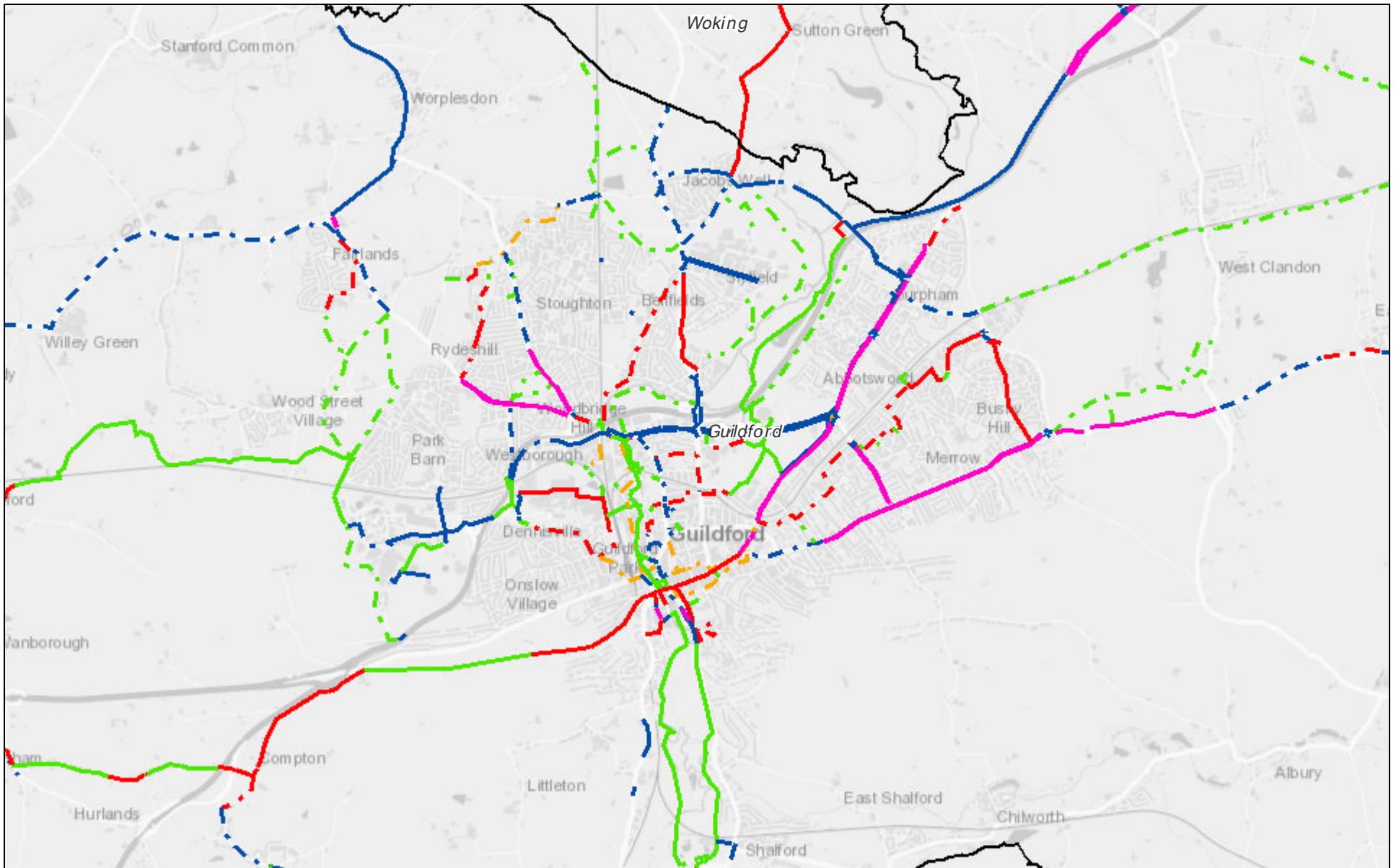
Key

- Segregated cycle tracks
- Greenway shared paths
- Urban paths
- Quiet streets



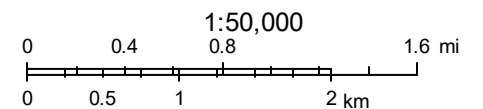
Appendix 2: Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated)

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



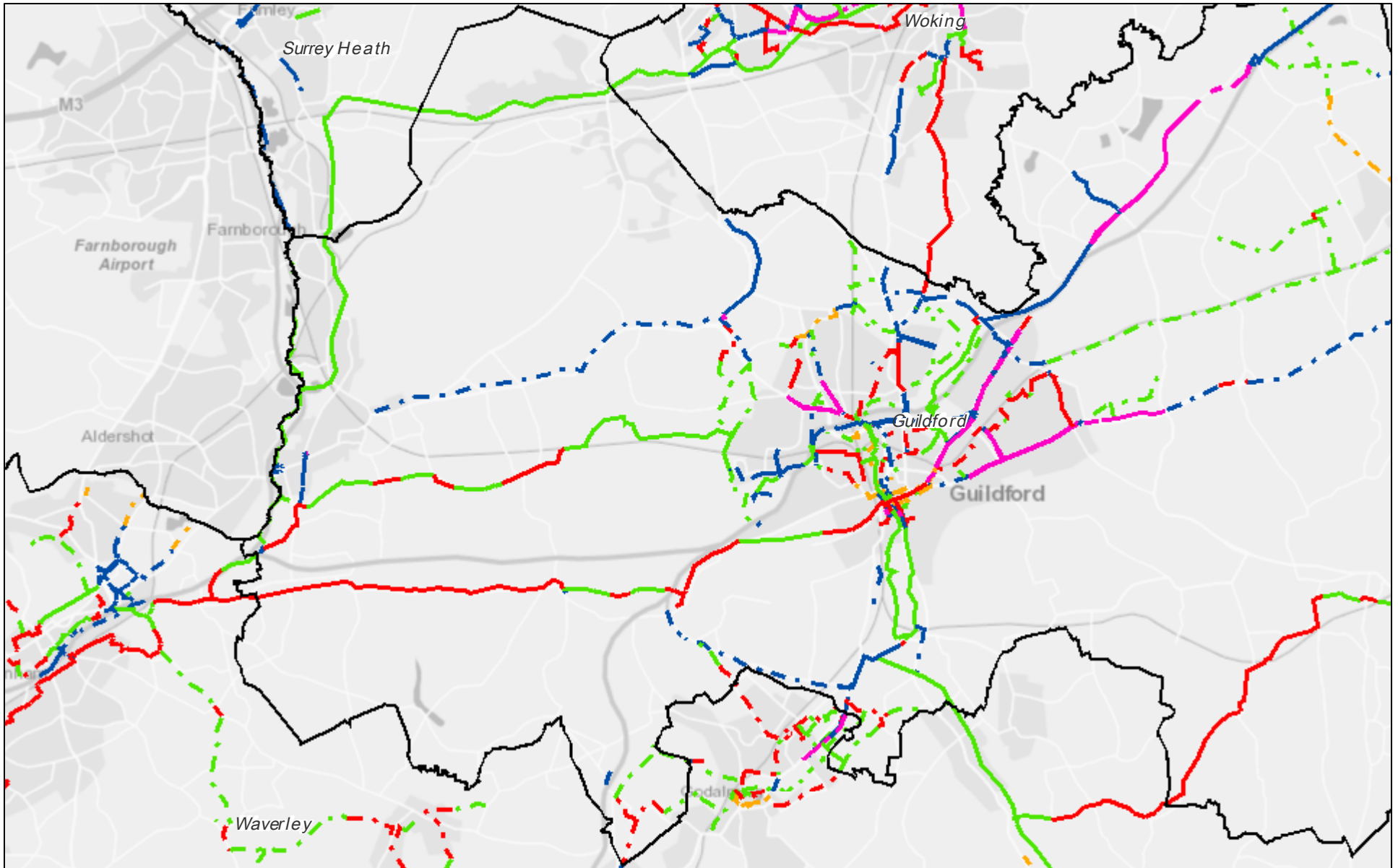
December 6, 2017

- | | | |
|---------------------------------|-------------------------|-----------------------------------|
| 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 | |



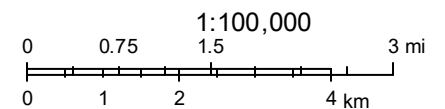
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Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated) [Accessed 6/12/2017]



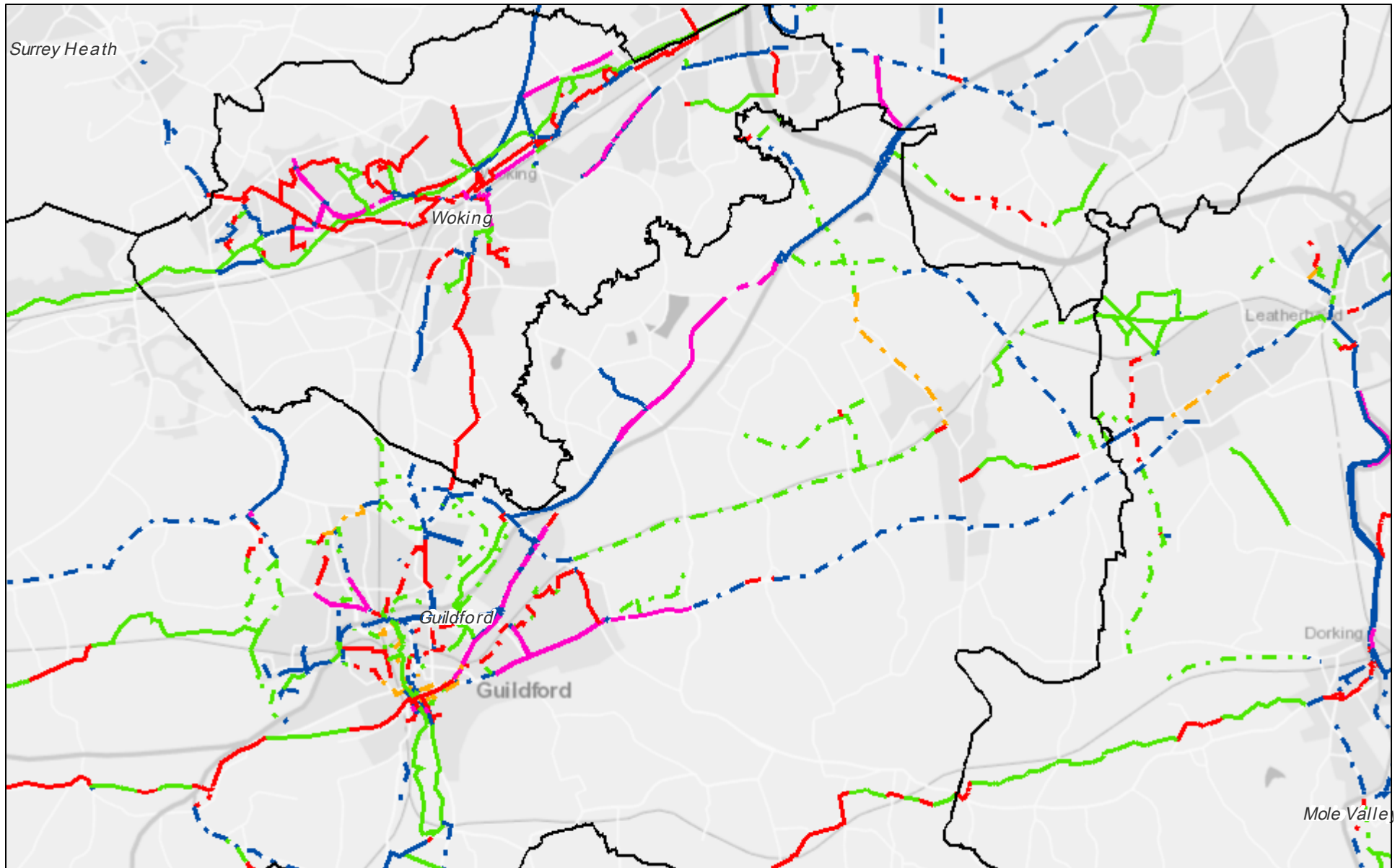
December 6, 2017

- | | | |
|---------------------------------|-------------------------|-----------------------------------|
| 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 | |



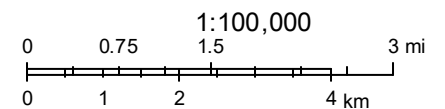
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Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated) [Accessed 6/12/2017]



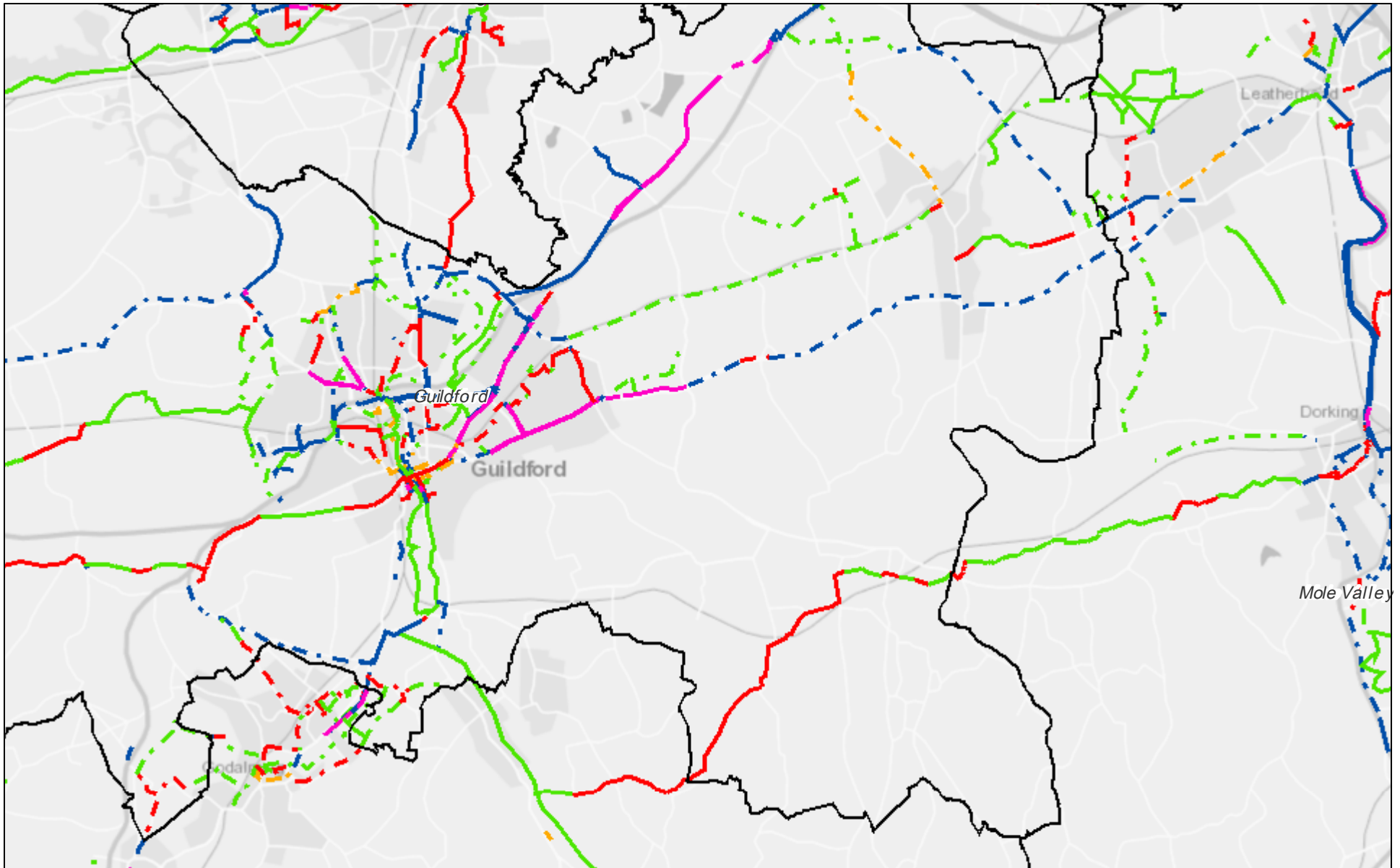
December 6, 2017

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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 | |



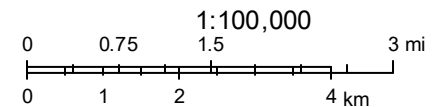
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Cycle network plan from Surrey CC's Guildford Local Cycling Plan (undated) [Accessed 6/12/2017]



December 6, 2017

- | | | |
|---------------------------------|-------------------------|-----------------------------------|
| 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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