Sustainability Appraisal (SA) of the Guildford Local Plan Part 2: Development Management Policies

SA Report

October 2021

Quality information

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Version information

This is a **draft** version subject to editing and adjustment prior to being published for consultation.

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1   Introduction

1.1   Background

1.1.1   AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Guildford Borough Local Plan: Development Management (DM) Policies, henceforth 'the LPDMP'.

1.1.2   Once in place, the LPDMP will supplement the recently adopted Local Plan: Strategy and Sites (LPSS, 2019), which deals with strategy and allocates sites for development. Specifically, the LPDMP will provide further and more detailed planning policies for Guildford Borough Council ('the Council') use when making development management decisions, i.e. when determining planning applications.

1.1.3   SA a required process for exploring and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.[1]

1.2   SA explained

1.2.1   It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.

1.2.2   In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan and reasonable alternatives'. The report must then be considered alongside consultation responses when finalising the plan.

1.2.3   More specifically, the SA Report must answer the following **three questions**:

- What has Plan-making / SA involved **up to this point?**

  – including with regards to consideration of 'reasonable alternatives'

- What are the SA findings **at this stage?**

  – i.e. in relation to the draft plan

- What are **next steps?**

1.3   This SA Report[2]

1.3.1   This is the SA Report for the LPDMP. It is published alongside the final draft ('proposed submission') version of the plan, in line with the requirements set out under Regulation 19 of the Local Planning Regulations (2012). The aim is to inform representations and subsequent plan finalisation.

Structure of this report

1.3.2   This report is broken down into **three parts**, according to the three questions above. Before answering the first question, there is a need to further set the scene by answering **two initial questions**:

- What is the plan seeking to achieve?

- What is the scope of the SA?

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[1] Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document
[2] See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely how and where regulatory requirements are met / are being met.

2   What's the plan seeking to achieve?

2.1   Introduction

2.1.1   The aim here is to explain more fully the context to plan preparation and the plan vision / objectives.

2.2   Legislative and policy context

2.2.1   Firstly, there is a need to reiterate a key point made above, namely that the LPDMP will supplement the LPSS (2019). The LPSS will be reviewed in due course, in line with the requirement that Local Plans are reviewed at least once every five years, but the LPDMP is not a review of the LPSS.[3]

2.2.2   The LPDMP is being prepared under the Town and Country (Local Planning) Regulations 2012 and underpinning primary legislation. It must reflect current Government policy, in particular as set out in the National Planning Policy Framework (NPPF, 2019) and Planning Policy for Traveller Sites (2015), and must also be prepared mindful of Government's online Planning Practice Guidance (PPG).

2.2.3   The LPDMP is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, there is a need to account for the views of Surrey County Council and other prescribed bodies to ensure the policies in the plan are effective.

2.2.4   Finally, it is important to note that the LPDMP will be prepared mindful of the 'made' Neighbourhood Development Plans (NDPs) for Burpham, Effingham, East Horsley, Lovelace, Puttenham, Send and West Horsley, as well as several emerging NDPs. NDPs must be in general conformity with the strategic policies in the Development Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case they are a consideration as part of LPDMP preparation.

2.3   Plan vision and objectives

2.3.1   The aim of the LPDMP is to contribute to the achievement of the vision and objectives set out within the adopted LPSS. More specifically, as discussed above, the aim of the LPDMP is to sit alongside the adopted plan by providing further and more detailed policies for the Council to use when determining planning applications.

What is the plan not seeking to achieve?

2.3.2   There is a need to be clear that the LPDMP will be overarching in nature, and hence naturally omit consideration of some detailed issues in the knowledge that these can be addressed at subsequent stages of the planning process, including at the planning application / development management (DM) stage. In particular, DM policies can never be entirely prescriptive, but rather must provide the Council with some flexibility in respect of matters to be explored through the DM process.

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[3] As explained at footnote 19 of the NPPF, reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).

3   What is the scope of the SA?

3.1   Introduction

3.1.1   The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan.

3.1.2   The aim here is to introduce the reader to the *broad scope* of the SA. **Appendix II** presents further information; however, it is not possible to define the scope of the SA precisely. Rather, there is a need for the SA scope to be flexible, responding to the scope of the emerging plan / options and evidence base.

3.2   Consultation on the scope

3.2.1   The SEA Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies". In England, the consultation bodies are the Environment Agency, Historic England and Natural England.[4] As such, these authorities were consulted on a Scoping Report in 2019[5].

3.2.2   The outcome of the scoping process was an SA 'framework' comprising 23 objectives, along with a series of associated questions to guide the assessment process. The SA framework is presented in summary below, with the objectives organised under a series of broad topic headings.

3.3   The SA framework

3.3.1   Table 3.1 presents the sustainability topics and objectives that form the 'backbone' of the SA scope. N.B. topics are listed here in alphabetical order, but can alternatively be listed according to whether the topic relates to the environment, communities / society or the economy (see Appendix II).

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[4] In-line with Article 6(3) of the SEA Directive, these bodies were selected because *'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*
[5] The Scoping Report is available at: https://www.guildford.gov.uk/article/25708/Sustainability-Appraisal-reports-Part-2

Table 3.1: The SA framework

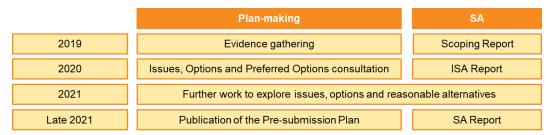| Topic	Objective
Air quality	Reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure
Biodiversity	Conserve and enhance biodiversity, geodiversity and the natural environment
Climate change adaptation	Build resilience and adapt to the impacts of climate change and extreme weather events such as flood, drought and heat risks particularly on groups more vulnerable to the effects of climate change
Climate change mitigation	Mitigate the causes of climate change through reducing emissions of greenhouse gases and efficient use of natural resources
Digital infrastructure	Ensure that the digital infrastructure available meets the needs of current and future generations
Economy	Maintain Guildford borough and Guildford town's competitive economic role
Education	Improve levels of education and skills in the population overall
Employment land	Facilitate appropriate development opportunities to meet the changing needs of the economy
Flood risk	Reduce the risk of flooding and the resulting detriment to public well- being, the economy and the environment
Health	Facilitate improved health and well-being of the population, enabling people to stay independent and reducing inequalities in health
Historic environment	Protect, enhance, and where appropriate make accessible, the archaeological land, historic environments and cultural assets of Guildford, for the benefit of residents and visitors
Housing	Meet housing requirements of the whole community and provide housing of a suitable mix and type
Land	Minimise the use of best and most versatile agricultural land and encourage the remediation of contaminated land
Landscape and townscape	Conserve and enhance the quality and local distinctiveness of landscapes and townscapes
Poverty	Reduce poverty and social exclusion for all sectors of the community
Previously developed land	Make the best use of previously developed land (PDL) and existing buildings
Rural economy	Enhance the borough's rural economy
Safe and secure communities	Create and maintain safer and more secure communities and improve the quality of where people live and work
Vibrant communities	Create and sustain vibrant communities
Waste	Reduce waste generation and achieve the sustainable management of waste and materials
Transport	Encourage the use of sustainable forms of transport (walking, cycling, bus, rail)
Water quality	Maintain and improve the water quality of the borough's rivers and groundwater
Water resources	Achieve sustainable water resources management and water conservation

Part 1: What has plan-making / SA involved up to this stage?

4 Overview

4.1 Introduction

4.1.1   An overview of the entire plan-making / SA process to date is presented in Figure 4.1.

Figure 4.1: Overview of the plan-making / SA process

	Plan-making	SA
2019	Evidence gathering	Scoping Report
2020	Issues, Options and Preferred Options consultation	ISA Report
2021	Further work to explore issues, options and reasonable alternatives	
Late 2021	Publication of the Pre-submission Plan	SA Report

4.1.2   However, the aim of this part of the report is not to relay the entire 'story' of plan-making to date, but rather the work undertaken to examine **reasonable alternatives** in 2021, ahead of finalising the Pre-submission Plan.

4.1.3   In line with the SEA Regulations, there is a requirement to present:[6]

- outline reasons for selecting reasonable alternatives;

- an appraisal of the reasonable alternatives; and

- outline reasons for selecting the preferred option(s).

4.2 Reasonable alternatives in relation to what?

4.2.1   Before going on to present the required information on reasonable alternatives, there is firstly a need to consider the question: *Reasonable alternatives in relation to what?* This question must be answered mindful of the legal requirement, which is to examine reasonable alternatives (RAs) taking into account the objectives of the plan.[7]

4.2.2   As discussed (Section 2.3), the LPDMP objectives are as per those set out in the adopted LPSS. The LPSS SA process focused attention on RAs in respect of the 'spatial strategy'; however, the LPDMP is not dealing with spatial strategy. As such, there is a need to give consideration to what aspects of the LPDMP should be the focus of efforts to define, appraise and consult upon RAs.

4.2.3   The Council and AECOM recognised that one approach to identifying RAs would be to ensure that each and every LPDMP policy was developed following formal appraisal of RAs. However, following discussion, it was determined that this approach would not be appropriate, proportionate or reasonable, on the basis that RAs could not be identified for all emerging policies. This reflected understanding that:

- In order for policy alternatives to be considered reasonable it must be possible to draw meaningful distinctions between them when appraised under the SA framework. Indeed, RAs should be distinct to the extent that the appraisal serves to highlight differential 'significant effects'. As set out within Planning Practice Guidance, SA *"should only focus on what is needed to assess the likely significant effects of the plan"*.[8]

- Whilst it is helpful to consider the merits of an emerging policy approach relative to the baseline, or 'do nothing' scenario, these two alternatives are not 'reasonable' for SA purposes. This reflects the simple fact that the appraisal of any policy option can be defined as appraisal *against the baseline*. There is a separate regulatory requirement to appraise the emerging draft policies/plan against the baseline – see Part 2 of this report. In turn, the implication is that alternatives, in order to be reasonable, must be 'do something' alternatives.

4.2.4   The 2020 Interim SA Report explored RAs under three headings: Housing density; Biodiversity net gain; and Parking standards. Furthermore, it set out 'outline reasons' for selecting these three policy areas and sought comments from consultees on this selection (see Section 4 of that report).

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[6] Regulations 12(2) sets out that a primary aim of the SA Report is to present an appraisal of reasonable alternatives. Schedule 2(8) then sets out that the SA Report must also present "an outline of the reasons for selecting the alternatives dealt with"
[7] Regulation 12(2) requires definition of reasonable alternatives taking into account "the objectives and geographical scope of the plan".
[8] See paragraph 009 at: https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

4.2.5   In spring/summer 2021 GBC officers and AECOM then held further discussions on the scope of RAs, and reached a decision that:

- housing density need no longer be a focus of work to examine reasonable alternatives (see Box 4.1);

- biodiversity net gain and parking standards still warrant work to examine RAs; and

- additionally, decarbonisation focused policy warrants being a new focus of work to examine RAs.

4.2.6   In conclusion, in spring/summer 2021, for the reasons outlined above,[6] the decision was made to formally explore RAs in respect of: **biodiversity net gain**, **decarbonisation** and **parking standards**.

Box 4.1: Reasons for not re-examining housing density alternatives

The 2020 Interim SA Report appraised two reasonable alternatives: Option 1 - a flexible criteria-based policy; and Option 2 - a more prescriptive policy with minimum densities for specific areas (as defined by Figure 5.1 of the report). The appraisal found there to be broad support for Option 1, but support for Option 2 in respect of two specific sustainability objectives, namely climate change mitigation and air quality. In light of the appraisal, the Council then confirmed Option 1 as the preferred option, and finalised detailed policy wording for consultation.

However, at the current time the view of officers (in discussion with AECOM) is that housing density need not be the focus of a stand-alone policy within the LPDMP. Rather, it is considered more appropriate to cover housing density within broader policies on "Achieving high quality design and respecting local distinctiveness" and "Residential infill development". This reflects a view that development densities should be arrived at as an outcome of a design process and, in turn, it is not appropriate to set policy solely on the matter of density.

This change in policy position is considered to align with the new emphasis on design codes nationally, including within the new NPPF (2021). Prescriptive densities are appropriately contained in a design code for a specific area.

What about other policy areas?

4.2.7   To reiterate, whilst the majority of policies within the Pre-submission Plan have emerged without formal alternatives appraisal, Part 2 of this report presents an appraisal of the Pre-submission Plan as a whole – i.e. the full suite of policies in combination - *against the baseline*. As part of the narrative discussion, within Part 2, there is naturally informal consideration of the choices available to the Council in drafting the policies, and ways in which the draft policies might potentially be adjusted to improve their performance in respect of SA objectives.

4.3   Whose responsibility?

4.3.1   It is important to be clear that: selecting RAs is the responsibility of the plan-maker (the Council), with AECOM acting in an advisory capacity; appraising RAs is the responsibility of AECOM; and selecting the preferred option(s) is the responsibility of the Council.

4.4   Structure of this part of the report

4.4.1   Having defined the three policy areas that should be a focus of work to explore RAs, the subsequent three sections deal with these in turn. Within each section, the aim is to present: an outline of the reasons for selecting the alternatives; alternatives appraisal findings; and the Council's reasons for selecting the preferred option.

4.5   Commenting on this part of the report

4.5.1   Comments are welcomed on:

- the decision to focus on alternatives in respect of the three policy areas listed above;

- the reasonable alternatives selected for appraisal in each instance;

- the appraisal of reasonable alternatives in each instance; and

- the Council's reasons for supporting the preferred option in each instance.

5   Biodiversity net gain

5.1   Introduction

5.1.1   The aim here is to discuss "outline reasons for selecting the alternatives dealt with", present an appraisal of reasonable alternatives and then present GBC officers' reasons for supporting the preferred option.

5.2   Selecting reasonable alternatives

5.2.1   The 2020 Interim SA Report presented an appraisal of two alternatives in respect of Biodiversity Net Gain (BNG): 1) 10% mandatory biodiversity net gain; and 2) 20% mandatory biodiversity net gain. The appraisal concluded that *"an ambitious approach to BNG is supported in respect of the majority of objectives, although there is perhaps a degree of risk in respect of housing and employment land objectives. Risks are uncertain as current understanding is that a 20% requirement would not lead to an unacceptable financial burden on the developer. Further evidence is required to understand the scale of the risk involved."*

5.2.2   The Council then selected Option 2 as the preferred option, and published this for consultation (Policy P7 within the Issues and Preferred Options consultation document). Through the consultation comments were received from 21 different organisations and individuals. Notably:

- Natural England – did not comment specifically on the percentage requirement, but through subsequent correspondence confirmed: *"Natural England welcomes an ambitious 20% net gain target for developments."*

- The Environment Agency – *"We fully support… the commitment for 20% biodiversity net gain (BNG). We're really pleased to see the Council striving for a higher figure than the minimum figure proposed by Government and mandating BNG for developments not mandated by Government."*

- The Woodland Trust – "We welcome the policy, including strong support for proposals to pursue a net gain minimum target of 20% published the preferred option for consultation." The Trust also notably went on to discuss how: "Appropriate site selection is essential to delivering biodiversity gain…"

- The Home Builders Federation – objected to the proposal, including on the basis that departing from the nationally prescribed standard (10%, which is set to be mandated through the Environment Bill) would *"inevitably create a conflict with legislation and create confusion and delay."*

5.2.3   Since the time of the Issues and Preferred Options consultation there has been further discussion and debate at national and local levels regarding BNG principles, approaches and methods. Updates include:

- The Environment Bill – has continued its passage through Parliament, with the latest amendments voted on by the House of Lords in September 2021. One change to the Bill sees "a new, historic, legally binding target to be set to halt the decline in species abundance by 2030", as explained by a Government Policy Paper (September 2021),[9] which also provides a helpful overview of the Bill, including its links to the Agriculture Act, ambitions for a national Nature Recovery Network and ambitious national tree planting commitments.

- Local Nature Recovery Strategies – are a central element of the Environment Bill, and consultation on guidance is ongoing at the current time.[10] The aim of LNRSs is to "guide smooth and effective delivery of biodiversity net gain and other nature recovery measures by helping developers and planning authorities avoid the most valuable existing habitat and focus habitat creation or improvement where it will achieve the best outcomes",[9] and it is understood that a LNRS for Surrey is currently in preparation, following national pilots.[11]

- Biodiversity Metric 3.0 – was published in July 2021.[12] This is the Government's methodology for calculating BNG, and its publication led to considerable debate nationally, including within the national media, around the value assigned to particular habitat types, including habitats typical of 're-wilding' efforts.

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[9] See gov.uk/government/publications/environment-bill-2020/10-march-2020-nature-and-conservation-covenants-parts-6-and-7
[10] See consult.defra.gov.uk/land-use/local-nature-recovery-strategies/
[11] See naturalengland.blog.gov.uk/2021/08/27/shaping-the-future-of-nature-recovery-developing-local-nature-recovery-strategies/
[12] See https://www.gov.uk/government/news/biodiversity-30-metric-launched-in-new-sustainable-development-toolkit

- Other authorities nationally - have continued to explore the potential to require 20% BNG through Local Plan policy, for example Swale Borough Council, within a Pre-submission Local Plan (Regulation 19) in early 2021. A recent consultation statement explains: *"Residents, parish/town councils, and environmental agencies were all very supportive of this policy…. Conversely, landowners and developers were of the view that the 20% principle is too high, unjustified and contrary to the forthcoming Environment Bill."*[13]

- Research – is emerging on the benefits and risks of BNG strategy. A key study was published in June 2021,[14] setting out a concern around effective use of habitat offsetting / offsite compensation. Whilst the Government had previously anticipated 25% of biodiversity units being achieved offsite, the research found the figure in practice to be much lower, raising "doubts about the size of the biodiversity unit market." The study authors are concerned about an over reliance on onsite measures as this could lead to opportunities missed in respect of *"strategic investments in the local nature recovery networks"* and *"investments in regional biodiversity priorities that can help restore biodiversity at a landscape scale"*. Equally, the authors are concerned about the effectiveness of onsite measures, having identified a prevalence of "small habitat patches" at risk of not developing/maturing as anticipated, and being subject to high levels of human pressure (related to this, a concern is that *"49% of the biodiversity units generated within residential developments in our sample come from on-site grasslands and scrub habitats"*). The authors recognise that there are strong 'access to greenspace' arguments in favour of generating biodiversity units onsite, and that an onsite focus has *"broad support from across stakeholders"*, but suggest *"this urgently deserves further debate"* because *"this priority risks overwhelming the biodiversity goals of the policy… potential trade-offs should be explicitly discussed."*

5.2.4   In light of these points, it is clear that it remains reasonable and appropriate to test alternatives, in respect of the percentage BNG that must be achieved by qualifying development proposals. With regards to the precise percentage figures to appraise, it remains appropriate to retest the figures previously examined in 2020.

5.2.5   In conclusion, on the basis of the discussion above, there are two reasonable 'do something' policy options:

- **Option 1** – require **10%** biodiversity net gain (N.B. this is a "do something" option on the basis that the national requirement will come into force two years after the Environment Act being enacted).

- **Option 2** – require **20%** biodiversity net gain

5.3 Alternatives appraisal findings

Introduction

5.3.1   The aim of this section is to present an appraisal of the alternatives introduced above.

Methodology

5.3.2   An appraisal of these alternatives is presented below in an appraisal 'matrix'. Within each of row of the matrix, the aim is to explore the merits of the alternatives in respect of one aspect of the SA framework (see Section 3). Specifically, within each row, the aim is to both A) rank the alternatives in order of preference, with "=" used where it is not possible to meaningfully differentiate the alternatives, and "?" used to highlight uncertainty; and B) predict 'likely significant effects' on a five point scale.[15]

5.3.3   Every effort is made to predict effects / differentiate the alternatives accurately; however, this is inherently challenging given the high level nature of the alternatives. The ability to predict effects / differentiate accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how alternatives will be implemented 'on the ground' and what the effect on particular receptors will be. Assumptions are explained as far as reasonably possible, recognising the need to also ensure conciseness and readability.

5.3.4   Finally, it is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. the effects of the plan in combination with other planned or on-going strategic activities), including the adopted LPSS.

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[13] See point 247 here: https://services.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=3580&Ver=4
[14] zu Ermgassen et al; see https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/conl.12820
[15] **Red** indicates a significant negative effect; **amber** a moderate or uncertain negative effect; no colour indicates neutral or uncertain effects; **light green** indicates a moderate or uncertain positive effect; and **dark green** indicates a significant positive.

Appraisal findings

5.3.5   Table 5.1 presents appraisal findings in respect of the following alternatives:

- **Option 1** – require **10%** biodiversity net gain
- **Option 2** – require **20%** biodiversity net gain

Table 5.1: Biodiversity – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	=	=	As per the equivalent discussion in 2020, there are clear biodiversity arguments for seeking to go beyond the nationally prescribed minimum approach. Firstly, this is on the basis of rates of biodiversity loss in Surrey.[16] Secondly, there are naturally concerns regarding the BNG approach failing to achieve stated biodiversity objectives, and perhaps even resulting in perverse long-term effects that are currently difficult to foresee or fully appreciate, because approaches and methods are in their infancy, and recognising that a focus on BNG will be, to some extent, at the expense of a focus on more traditional approaches to biodiversity conservation and enhancement. The 2020 Interim SA Report discussed a concern that a 10% net gain requirement could be "within the margin of error", such that it doesn't deliver "real benefits" in practice.[17] At the current time, the Biodiversity Metric 3.0 is a proactive and positive step, and progress on bringing forward effective LNRSs, both nationally and locally, is very encouraging; however, ze Ermgassen et al. (2021) highlight some significant concerns, including around a piecemeal approach whereby the combined effect is less than the sum of its parts. Biodiversity must be considered at landscape scales and with a long-term perspective, hence it is important that BNG approaches lend support to strategic initiatives, and certainly do not distract from or lessen the focus on such initiatives. On one hand, this lends support for requiring a higher (20% net gain figure). On the other hand, in the GBC context there is likely to be relatively good potential for strategically targeted offsite measures given experience of SANG delivery to ensure effective avoidance and mitigation of recreational impacts to the Thames Basin Heaths SPA; for example, there is a long standing relationship with the Land Trust. Whilst there are tensions between SANG objectives (focused on access) and BNG objectives, and there is a need to ensure 'additionality' if and when SANG is used to secure biodiversity credits (i.e. interventions must be additional to what would not have happened in any case), there is cautious optimism regarding the potential for effective and efficient implementation of BNG in the GBC context.

With regards to non-biodiversity objectives, the first point to consider is whether and to what extent there is a risk of 20% BNG leading to a cost on the development industry that reduces funds available for measures focused on the achievement of non-biodiversity objectives, or perhaps even a situation whereby development becomes unviable. These matters have been examined through the LPDMP Viability Assessment, which concludes that the package of DM policy requirements tested, including 20% BNG, is acceptable in viability terms; however, for the purposes of this appraisal, it is appropriate to flag a risk of some residual issues or impacts. Whilst there is little or no certainty, it is appropriate to flag a particular concern regarding affordable housing delivery, which can be, and often is, a matter for negotiation at the development management stage on viability grounds. Whilst affordable housing delivery is currently strong – as measured against policy requirements – this situation could change in the future, |
Biodiversity	=	=	
Climate change adaptation	=	=	
Climate change mitigation	2	☆ 1	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	=	=	
Health	=	=	
Historic environment	=	=	
Housing	☆ 1	2	
Land	=	=	
Landscape and townscape	=	=	

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[16] This is a key reason why a Surrey Nature Partnership Position Statement recommends 20% BNG. However, it is recognised that there is a need to apply caution when comparing rates of biodiversity loss at national and local levels; for example, a species could become locally extinct whilst populations remain relatively healthy at the national scale.

[17] See cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf

Poverty	=	=	if the housing market were to weaken, plus there is a need to consider implications of First Homes policy. A further consideration is whether a 20% BNG policy could disproportionately affect the viability of smaller sites, which are
Previously developed land	=	=	important from a perspective of meeting housing delivery targets and housing needs in rural areas, and importantly support SME house builders. Disproportionate impacts are not envisaged, but there is an element of residual risk, ahead of BNG approaches and methods maturing.
Rural economy	=	=	Finally, as per the equivalent discussion in the 2020 Interim SA Report, there is a need to recognise that an ambitious approach to BNG will also translate into additional ecosystem service benefits to communities, for example in terms of
Safe / secure communities	=	=	recreation and flood risk. Work nationally to explore how to take the step from a BNG approach to an environmental net gain (ENG) approach has continued since the time of the 2020 consultation; for example, Natural England published
Vibrant communities	=	=	a beta Environmental Benefits from Nature (EBN) tool in July 2021;[18] also, CIEEM has advocated for ENG.[19] However, even if the focus is on BNG, as opposed to wider (and far more complex) ENG, there will still be wider
Waste	=	=	ecosystem service benefits (albeit recognising that there can be tensions between achieving biodiversity and wider ecosystem service benefits).
Transport	=	=	In conclusion, an ambitious approach to BNG is supported in respect of the majority of objectives, although there is an element of risk in respect of housing and employment land objectives. Risks are uncertain as current understanding is that a 20% requirement would not lead to an unacceptable financial burden
Water quality	=	=	on the developer. With regards to effect significance, it is possible to predict likely significant positive effects under Option 2 in respect of biodiversity, with other effects much more uncertain and likely to be of lower significance.

5.4   Selecting the preferred option

5.4.1   The following text is provided by GBC officers:

Option 2 is the preferred option. The 20% requirement exceeds the 10% figure recommended nationally but reflects the fact that Surrey has suffered a severe biodiversity decline which is significantly worse than the country as a whole, and is more consistent with the NPPF as the higher figure provides greater certainty that a genuine net gain will be achieved. It is also important to note that specified types of development will be exempt from the requirements (although all developments will be expected to maximise biodiversity gains).

Finally, it is important to clarify the Council's proposed approach includes setting supplementary requirements and expectations in respect of:

- Off-site measures - where the full required net gain cannot be achieved on a development site, the remaining gain may be achieved outside the development site, either by the developer or by a third party. In the unlikely event that the required gains cannot be provided through these routes, the Council may negotiate a financial contribution which will be used to secure the required gain by obtaining credits from a 'habitat bank'.

- BNG measures on SANG – measures must complement the recreational purpose and uses of the SANG, and must provide measurable additionality over and above the minimum requirements of the SANG.

- Stewardship - all habitat that is created or enhanced in order to meet the net gain requirement is required to be secured and maintained for at least 30 years.

- Baseline biodiversity units - the biodiversity value of a development site must not be artificially reduced before the baseline for the net gain is set. Where the Council considers that on-site habitat has been degraded or removed intentionally, it will require the baseline to reflect at least the full biodiversity value of the site before the degradation occurred and will apply any punitive measures set out in legislation. Biodiversity sites must likewise not be intentionally cleared or degraded in order to increase the potential for biodiversity gain.

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[18] See ecosystemsknowledge.net/Environmental-Benefits-from-Nature
[19] CIEEM explain: *"Whilst it might seem that both developers and ecologists are still getting to grips with Biodiversity Net Gain (BNG) and offsetting, it is clear that the direction of policy travel in several territories around the world is towards utilising a wider Environmental Net Gain (ENG) approach… This has recently been reinforced by the Natural Capital Committee: "The government should urgently replace biodiversity net gain with environmental net gain, ensuring this applies to all nationally significant infrastructure and the marine environment. Delivery of net zero will become incredibly difficult, if not impossible, without environmental net gain – it is the only approach that considers the impact on the terrestrial and marine ecosystems, including biocarbon stocks."" See https://cieem.net/i-am/influencing-policy/strategic-policy-sub-committee/environmental-net-gain/*

6   Decarbonisation

6.1   Introduction

6.1.1   The aim here is to discuss "outline reasons for selecting the alternatives dealt with", present an appraisal of reasonable alternatives and then present GBC officers' reasons for supporting the preferred option.

6.2   Selecting reasonable alternatives

6.2.1   Guildford Borough Council declared a climate emergency in July 2019, following declaration of a national climate emergency in May 2019, and the passing into law of an amendment to the Climate Change Act 2008 in July 2019, which set 2050 as the national **net zero** target date. This target date was set broadly in line with the recommendations of the Climate Change Committee, which reflected the international "Paris Agreement" (2015). Most recently, in April 2021, the UK Government committed to an interim target of 78% reduction against 1990 levels by 2035, in line with a further recommendation made by the Climate Change Committee.

6.2.2   The Borough Council has committed to "working with partners across the Borough to evaluate and determine how and when Guildford Borough could become carbon neutral, with a target goal of 2030 for reaching net zero emissions."[20]   If 2030 is set as a net zero target date, then this would align with the most ambitious LPAs nationally; for example, nearby Wokingham and Bracknell Forest have both set 2030 as a net zero target date. A report published by the Climate Change Committee in December 2020 found that: "Over 300 local authorities have declared Climate Emergencies… . More than half of these have a Net Zero target date of 2030."[21]

6.2.3   Important context comes from the Surrey Climate Change Strategy (2020), which sets out a decarbonisation pathway (or 'trajectory'), with the aim of achieving net zero by 2050. Several interim targets are highlighted along the course of this trajectory, including the target of achieving an 80% reduction against 2019 levels by 2035. The strategy then goes on to discuss priority decarbonisation measures under a series of headings.

6.2.4   The focus here is greenhouse gas emissions from the **built environment**, and in particular from homes. A recent study for a nearby local authority found that domestic greenhouse gas emissions currently account for around 41% of total emissions, with this figure set to increase to 51% by 2040.[22] This anticipated percentage increase reflects an assumption that transport emissions will decrease significantly, due to the switch-over to electric.

6.2.5   Furthermore, it is important to recognise that this large increase in the proportion of total greenhouse gas emissions attributed to domestic buildings is predicted *in spite of* an assumed major reduction in domestic emissions due to electricity use, which reflects the anticipated decarbonisation of the national grid. The implication is that it is continued use of **natural gas** that is the reason for the predicted increase in the proportion of total greenhouse gas emissions attributed to domestic buildings.

6.2.6   Gas is used primarily for heating our homes, hence decarbonising **domestic heating** is seen as a national decarbonisation priority. This point came through clearly within the Government's Ten Point Plan for a Green Industrial Revolution (2020), with "Point 7: Greener Buildings" focused almost exclusively on decarbonising heating, which means both reducing the demand for heating through efficiency measures and decarbonising the production of heat. The Ten Point Plan also notably highlighted that interventions to deliver 'greener buildings' are associated with potential greenhouse gas emissions savings far in excess of other interventions - see Table 6.1 – and committed to delivering a national Heat and Buildings Strategy, which is now imminent.

6.2.7   Maintaining a focus on decarbonising domestic heating, important recent context comes from the UK Green Building Council (UKGBC) Policy Playbook (2021), which explains:

"According to the Climate Change Committee, in order to reach net zero the UK must reduce its emissions from 430 MtCO2e to around 29 MtCO2e in 2050. This will require a reduction in the direct emissions from buildings **from around 85 MtCO2e in 2017 to around 4 MtCO2e in 2050**. To achieve this, the Committee has made clear that this will require 'a new approach that will lead to the full decarbonisation of buildings by 2050', **using a mixture of energy efficiency and low carbon heating measures**." [emphasis added]

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[20] See CO26 here: https://democracy.guildford.gov.uk/ieListDocuments.aspx?CId=159&MId=863 (noting the amendment)
[21] See theccc.org.uk/wp-content/uploads/2020/12/Local-Authorities-and-the-Sixth-Carbon-Budget.pdf
[22] See surreyheath.gov.uk/sites/default/files/Surrey%20Heath%20Local%20Plan%20-%20Climate%20Change%20Study.pdf

Table 6.1: Government's Ten Point Plan (2020) – ranked by stated emissions savings

Ten point plan		GHG savings 2023-2032 (MtCO2e)
7	**Greener Buildings**	**71**
2	Low Carbon Hydrogen	41
8	Carbon Capture, Usage and Storage	40
1	Offshore Wind	21
4	Zero Emission Vehicles	5
5	Public Transport, Cycling and Walking	2
6	Jet Zero and Green Ships	1
9	Natural Environment	-
3	Nuclear Power	-
10	Green Finance and Innovation	-

6.2.8   Emissions associated with heating are known as **regulated operational emissions**, in that they are covered by the Building Regulations and associated with the operational use of the building. There is also a major focus nationally on minimising unregulated emissions - including both operational (including electricity use for TVs, personal computers and other 'plug in loads') and non-operational (i.e. emissions associated with a buildings lifecycle regardless of its operational use); however, the focus here is on *regulated operational emissions*.

6.2.9   The question, therefore, is whether and how to set requirements that depart from (i.e. are more stringent than) the requirements of the **Building Regulations**. It has recently been clarified (following a lack of clarity of recent years) that it *is* within the remit of Local Plans to do so. This clarity was provided in the Government's response to the Future Homes Standard consultation (2019), which was published in January 2021.[23]

6.2.10   However, at the same time, the Government confirmed that it will be tightening Building Regulations over the coming years, to the point whereby the Regulations require achievement of a defined **Future Homes Standard** (FHS) by 2025. Also, the Government confirmed that, as an interim step towards the FHS, Building Regulations carbon emissions standards will be tightened by 31% in 2022. The Government is also consulting on a Future Buildings Standard for non-residential.

6.2.11   As such, and recognising the timetable for preparing and adopting the LPDMP, there is arguably relatively little to be gained by setting local policy on regulated operational emissions. Rather, there is an argument for deferring to the Building Regulations, in light of the Government's FHS commitments, and recognising that there is merit to a consistent national approach and, in turn, a helpful degree certainty for the development industry.

6.2.12   However, on the other hand, there is an argument for requiring a 31% improvement on Building Regulations through the LPDMP, as a contingency for unforeseen delays to the FHS timetable. This is the "do minimum" approach recommended by the UKGBC Policy Playbook (2021), which explains:

"[T]he Future Homes Standard consultation concluded that a 31% reduction in carbon emissions compared to the current Part L is viable now on a national scale. Indeed the Government confirmed on 19 January 2021 that this 31% uplift will now come into effect in 2022. It is critical to reduce carbon emissions from new homes if the Government's net zero emission target is to be met. Given this urgency, there is no credible reason to delay the implementation of the 31% reduction target in the wait for the Part L performance uplift."

6.2.13   On this basis, requiring a 31% reduction in regulated operational emissions compared to the requirements set out in the current Building Regulations, is a reasonable option for the LPDMP.

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[23] See gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings

6.2.14   It is difficult to suggest that a higher percentage reduction figure is reasonable, on development viability grounds.

N.B. whilst some local authorities are requiring, or proposing to require, net zero development through their Local Plans, this necessitates offsetting residual emissions; for example, the London Plan sets out proposals clearly here, explaining that the requirement is to achieve a 35% reduction onsite with remaining emissions offset. For the LPDMP, the aim is to set a requirement that must be met onsite, without resorting to offsetting.

6.2.15   However, there is a basis for testing the option of a 20% reduction (in regulated operational emissions compared to current Building Regulations). Specifically, reasons are as follows:

- A 20% reduction figure aligns with the 19% reduction figure that is required through a number of Local Plans adopted over recent years, following a Written Ministerial Statement in 2015 (linked to Level 4 of the Code for sustainable Homes).

- Policy D2 of the adopted LPSS requires a 20% reduction, before going on to state: "*Where it can clearly be shown that this is not possible, offsite offsetting measures… should be delivered.*" In practice, offsetting has not been needed, to date, for proposals to meet the policy requirement, hence requiring a 20% reduction without offsetting is close to 'the baseline situation'; however, it is appropriate to test as an option nonetheless.

- A 20% reduction was presented as an option as part of the Government's FHS consultation (2019); however, the 20% 'option' presented in the FHS consultation document was described as 'Future Homes Fabric', in that the expectation was that the improvement would be achieved through fabric/efficiency improvements alone.[24] For the purposes of this appraisal, the assumption is that there would be a 'fabric first' approach, but with flexibility to utilise low/zero carbon technologies (typically solar PV and heat pumps).

6.2.16   In conclusion, on the basis of the discussion above, there are two reasonable "do something" policy options:

- **Option 1** – require a **20%** reduction in regulated operational emissions (onsite) compared to the requirements set out in the current Building Regulations

- **Option 2** – require a **31%** reduction in regulated operational emissions (onsite) compared to the requirements set out in the current Building Regulations

6.2.17   It is recognised that there are other policy options that could potentially be explored, for example options involving net zero carbon development via offsetting, and options that involve specifying *how* onsite emissions reductions should be achieved;[25] however, the two options presented above are considered reasonable.

6.3   Alternatives appraisal findings

Introduction

6.3.1   The aim of this section is to present an appraisal of the alternatives introduced above.

Methodology

6.3.2   See discussion above, within Section 5.3.

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[24] See the discussion here.
[25] For example, the UKGBC Policy Playbook (2021) suggests that, as a minimum, Local Plan policy should require: *"A fabric first approach shall be prioritised, ensuring that at a minimum the thermal performance of the whole envelope exceeds that of the notional specification by 5%."* Furthermore, the UKGBC Policy Playbook (2021) recommends that Local Plans give consideration to a host of other policy options relating to built environment emissions, covering operational emissions (regulated and unregulated), non-operational emissions and more. However, there are question-marks regarding the viability of such policy options, and there are concerns regarding creating a complex and confusing policy environment, and uncertainty for the development industry.

Appraisal findings

6.3.3   Table 6.1 presents appraisal findings in respect of the following alternatives:

- **Option 1** – require a **20%** reduction in regulated operational emissions

- **Option 2** – require a **31%** reduction in regulated operational emissions

Table 6.1: Decarbonisation – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	=	=	The Future Homes Standard (FHS) consultation document (2019) set out that the Government's preferred approach, in respect of an interim uplift to Building Regulations, ahead of a further uplift to the FHS, was to require a 31% reduction in emissions compared to the requirements set out in the current Building Regulations. This preferred option was recently confirmed by the Government's response to the consultation (2021); however, the uplift timetable remains unclear or, at least, is feasibly subject to delay. As such, there is an argument for requiring 'a 31% reduction' through LPDMP policy, as a failsafe against any delay to the Building Regulations uplift. Also, it is appropriate to plan proactively for the 31% uplift now, to ensure that additional cost implications can be absorbed without an undue effect on meeting other LPDMP policy requirements and, in turn, achieving wider Local Plan and wider sustainability objectives. Perhaps most notable, amongst the non-decarbonisation focused objectives that represent a competing priority for developer funding, is affordable housing.
Biodiversity	=	=	
Climate change adaptation	=	=	
Climate change mitigation	2	⭐**1**	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	=	=	As such, it is difficult to argue against Option 2, given that it is the Government's preferred option. It is difficult to suggest any concerns around development viability, or the capacity of the building industry to deliver the 31% uplift in an effective way (e.g. without corners being cut / poor practice, e.g. measures being installed with low capital cost but with higher running costs, or air tightness measures that lead to ventilation issues), because the requirement is set to come into force nationally in the near future, and the conclusion of Government is that a 31% uplift is achievable and viable now. In turn, it is difficult to suggest logic to Option 1 as a short term stop-gap to the Building Regulations being uplifted to require a 31% reduction.
Health	=	=	
Historic environment	=	=	
Housing	?	?	
Land	=	=	
Landscape and townscape	=	=	
Poverty	=	=	
Previously developed land	=	=	Also, it is important to recall that under Option 2 there would be flexibility in how the requisite emissions reduction is achieved. The UKGBC is notable for calling for a major focus on energy efficiency measures ahead of low and zero carbon technologies (typically rooftop solar PV and heat pumps), but there are concerns regarding industry capacity and viability (e.g. thicker walls impact layouts).
Rural economy	=	=	
Safe / secure communities	=	=	In conclusion, Option 2 is the preferable option from a decarbonisation perspective. The equivalent appraisal at the Regulation 18 stage suggested that Option 1 was preferable in terms of 'housing' objectives, particularly affordable housing objectives, but it is now not at all clear this is the case, with uncertain effects predicted on balance. The views of the development industry will be welcomed through the forthcoming consultation.
Vibrant communities	=	=	
Waste	=	=	With regards to effect significance, neither of the alternatives are predicted to result in significant effects in respect of any SA topic.
Transport	=	=	
Water quality	=	=	

6.4   Selecting the preferred option

6.4.1   The following text is provided by GBC officers:

Option 2 is the preferred option. It is supported by viability testing and represents an appropriate step ahead of the Building Regulations being updated. It is a significant step forward on the approach required under LPSS Policy D2, and it is recognised that there will be a need to monitor emerging policy, guidance and best practice over time, as this is a fast moving policy area.

7 Parking standards

7.1 Introduction

7.1.1   The aim here is to discuss "outline reasons for selecting the alternatives dealt with", present an appraisal of reasonable alternatives and then present GBC officers' reasons for supporting the preferred option. It is important to be clear, at the outset, that the focus here is on residential car parking standards.

7.2 Selecting reasonable alternatives

7.2.1   Car ownership in the UK has risen steadily over the past 60 years, and despite some efforts in more recent decades to improve infrastructure and services to encourage people to make journeys on foot, by bicycle, on buses and trains, the need to provide for appropriate levels of parking in new development remains important. This is for two headline reasons:

- Firstly, both under and over provision can lead to a number of problems for new development and adjacent neighbourhoods. Amongst other things, over-provision can be visually detrimental and, by contributing to lower densities can increase the cost of new homes, whilst under-provision, amongst other things, can lead to problematic on street parking with resulting traffic congestion and road safety issues.

- Secondly, there are strategic arguments around, amongst other things decreasing car dependency from a decarbonisation perspective and ensuring accessibility to services, facilities, employment etc.

7.2.2   A policy shift has occurred over time, from a maximum-standard approach pre-NPPF, to a more tailored approach since 2012. The current NPPF (2021) indicates that local authorities should only impose maximum parking standards for residential and non-residential development where there is clear and compelling justification necessary to the management of the local road network, or in order to optimise the density of development in city and town centres and other locations that are well served by public transport.

7.2.3   Non-statutory guidance from Surrey County Council[26] indicates parking standards in residential development should be tapered from higher maximum standards in suburban/edge/village/rural locations to lower maximum standards in town centre locations. Conversely, some Neighbourhood Plans have included policies defining minimum parking standards in order to realise a greater number of on-plot parking spaces.

7.2.4   The Local Plan: Strategy and Sites (2019) signals that a Parking Supplementary Planning Document (SPD) will be prepared by the Council. Policy ID3 requires that development proposals provide an appropriate level of off-street vehicle parking such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users. It also states that consideration will be given to setting maximum parking standards for Guildford town centre in the SPD.

7.2.5   Other related matters include electric vehicle charging, unallocated visitor space, cycle parking, on street parking and non-residential car parks. The Strategic Development Framework SPD (July 2020) includes electric vehicle charging standards for the strategic sites and also guidance on the design of on street parking within new developments and the minimum dimensions of car parking spaces.

7.2.6   The preferred option at the Regulation 18 stage involved: a maximum standard for within the town centre; and a single minimum standard across the rest of the Borough as the preferred option. However, at the current time there is further evidence available to guide the setting of parking standards, such that there is the potential for a more spatially defined approach, differentiating between: strategic sites; non-strategic sites in the town centre, non-strategic sites in the wider urban area; and non-strategic sites for villages and the rural area.

7.2.7   In conclusion, on the basis of the discussion above, there are two reasonable "do something" policy options:[27]

- **Option 1** – defined maximum standards for within the town centre and a single defined minimum standard across the rest of the Borough (the Regulation 18 preferred option).

- **Option 2** – maximum defined standards for within the urban area and at strategic sites, with defined expected standards for villages and the rural area.

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[26] Surrey County Council (2018) Vehicular and Cycle Parking Guidance [online] available at:
https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/155660/January-2018-Parking-Guidance-for-Development.pdf
[27] Maximum standards for strategic sites have been defined and are set out in the current consultation (see Appendix B), whilst standards for non-strategic sites (within and outside the urban area) will be set out in the forthcoming Parking SPD.

7.3 Alternatives appraisal findings

Introduction

7.3.1 The aim of this section is to present an appraisal of the alternatives introduced above.

Methodology

7.3.2 See discussion above, within Section 5.3.

Appraisal findings

7.3.3 Table 7.1 presents appraisal findings in respect of the following alternatives:

- **Option 1** – defined maximum standards for within the town centre and a single defined minimum standard across the rest of the Borough (the Regulation 18 preferred option).

- **Option 2** – maximum defined standards for within the urban area and at strategic sites, with defined expected standards for villages and the rural area.

Table 7.1: Parking standards – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	2	☆1	There are arguments for restricting car parking from a climate change mitigation perspective, and also potentially from a health perspective, which might potentially be achieved through Option 2, through a focus on spatially defined maximum and expected standards, over-and-above Option 1.
Biodiversity	=	=	
Climate change adaptation	=	=	Specifically, restriction of parking spaces can stimulate modal shift away from use the private car towards use of active (walking, cycling) and public (buses, trains) modes of transport. It can also be suggested that restricted parking might lead to more land being made available for other uses, which could lead to benefits in respect of other sustainability objectives.
Climate change mitigation	2	☆1	
Digital infrastructure	=	=	However, it is a challenge to conclude benefits with confidence. This is because residents might respond to a restricted number of parking spaces by parking on-roads, which can also cause problems in respect of localised traffic congestion and impacts to the urban realm. Whilst design and enforcement (such as yellow lines) can provide mitigation, residual impacts can include:
Economy	=	=	
Education	=	=	• Air quality – increased stop-start leads to increased air pollution.
Employment land	=	=	• Climate change mitigation – on-road parking can pose problems for bus movements and also dissuade cyclists.
Flood risk	2	☆1	• Safe/secure communities – on-road parking can be an impediment to both safe cycling and safe walking including for those with mobility challenges, e.g. wheelchair and mobility scooter users.
Health	2	☆1	
Historic environment	?	?	• Historic environment – on-road parking can impact on the urban realm, potentially with implications for the setting of historic assets.
Housing	=	=	A further key concern with overly restricted parking is insufficient parking in more rural areas leading to a situation whereby residents struggle to access services and facilities and employment. Under Option 2 there could feasibly be a risk of expected standards leading to over-restriction in some cases (given data limitations, and the fact that rural accessibility can change over time, e.g. local services and facilities can be lost). However, these concerns are uncertain, including as the planning application process allows planning decisions to take into account material considerations which could include such factors.
Land	2	☆1	
Landscape and townscape	=	=	There is also a need to consider the risk of insufficient parking serving to restrict the shift towards electric vehicles, as such vehicles require designated parking spaces with access to a charging point. This could lead to negative implications

Poverty	=	=	in respect of climate change mitigation and air quality, but also in terms of the economy, recognising that electric vehicle production is a potential major economic growth area.
Previously developed land	=	=	This discussion has so far served to highlight quite wide-ranging benefits associated with Option 2. Other benefits of setting spatially defined maximum and expected standards, as opposed to more 'blanket' minimum standards, relate to ensuring efficient use of land and minimising impermeable surfaces.
Rural economy	?	?	
Safe / secure communities	=	=	However, under Option 2, it will be important to ensure that expected standards are not set too high such that opportunities for low-car development outside of the urban area and strategic sites are unduly restricted. It will also be important to ensure that maximum standards are set suitably low within the urban area and for strategic sites, perhaps most notably those strategic sites linked to the Guildford Sustainable Movement Corridor and/or set to support higher densities.[28]
Vibrant communities	=	=	
Waste	=	=	
Transport	2	⭐ **1**	In conclusion, Option 2 is supported in respect of a range of objectives. The only identified concerns relate to the possible risks of overspill parking taking place on-street – which could result in localised traffic and impacts to the urban realm, and accordingly on air quality, climate change mitigation, safe/secure communities, and historic environment - and under-provision of parking in villages and the rural area, which could impact resident access to services, facilities and employment. However, there is little reason to conclude any significant concern, including on the basis of the proposal that Neighbourhood Plan parking standards take precedence (other than for strategic sites). Significant effects are not predicted.
Water quality	=	=	

7.4 Selecting the preferred option

7.4.1 The following text is provided by GBC officers:

Option 2 is the preferred option. Specifically, the proposal is for the LPDMP and the Parking SPD to define the maximum and expected levels of parking permitted for various sizes of residential development in different areas of the borough. This approach involves a spatially-differentiated approach to the provision of vehicle parking for new residential developments with the focus of restraint increasing closer to Guildford town centre.

The proposal aims to respond to current car availability whilst also enabling lower car availability in new residential developments in urban settings and at the strategic sites, in line with the societal trends, potential future scenarios and net zero targets. In rural and village areas, expected standards match current levels of car availability that are reflective of differences in accessibility to key services and facilities by non-car modes.

As well as these headline points, it is also important to note that proposed Policy ID11 (Parking Standards): gives primacy to parking standards set by Neighbourhood Plans should there be conflict, except in relation to strategic sites; sets out what will be expected from proposals (in the urban area and the strategic sites) that seek to deliver parking at levels below the maximum standard (including car-free developments, which must be justified by a coherent package of sustainable transport measures); and deals with a number of more specific matters relating to parking, including EV charging. It is also important to be clear that, in addition to setting policy direction, the LPDMP presents numerical parking standards for the strategic sites, whilst numerical standards for the non-strategic sites are contained within the draft Parking SPD, due to be consulted upon at the same time as the Reg 19 document.

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[28] To be clear, the Parking SPD sets numerical standards on non-resi sites. Numerical standards for strategic sites are in an appendix of the LPDMP. Standards are set at, or rounded up from, observed average car availability (by location, household size and type of dwelling (flat/house). Census data was obtained and analysed at LSOA level to calculate these averages. The policy also sets out instances where low-car development is acceptable and measures to aid delivery of low car/car free development. However, as the standards in village/rural areas are expected standards, some flexibility could be allowed based on local conditions.

Part 2: What are the appraisal findings at this stage?

8   Introduction to Part 2

8.1.1   The aim of this part of the report is to present an appraisal of the Pre-submission LPDMP.

8.1.2   This introductory section presents an overview of the LPDMP and discusses appraisal methodology.

8.2   Overview of the Draft LPDMP

8.2.1   The Pre-submission LPDMP presents 40 policies under the same five headings used as a basis for structuring thematic policies in the LPSS (2019), namely:

- Housing
- Economy
- Protecting
- Design
- Infrastructure and delivery.

8.2.2   Under each of these headings the aim is to present policies to supplement those within the LPSS.

8.3   Appraisal methodology

8.3.1   The appraisal identifies and evaluates 'likely significant effects' of the LPDMP, as a whole, on the baseline situation in respect of the sustainability topics/objectives that comprise the SA framework (see Table 3.1).

8.3.2   Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and an understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility to the non-specialist).   In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the LPDMP in more general terms.

8.3.3   Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations (2004). So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. **Cumulative effects** are also considered, i.e. the potential for LPDMP to impact on the baseline when implemented alongside other plans, programmes and projects that are 'in the pipeline', **including the LPSS (2019)**. These effect 'characteristics' are described within the appraisal as appropriate.

Adding structure to the appraisal

8.3.4   Whilst the aim is essentially to present an appraisal of Pre-submission LPDMP 'as a whole', it is appropriate to also give consideration to individual elements of the plan in isolation. As such, each of the topic-specific appraisal narratives is broken-down under sub-headings – see Table 8.1.

Table 8.1: Structure of each topic-specific appraisal narrative

Sub-heading	Aims of the narrative
Commentary on policies	Discuss policies in isolation and in combination Discuss how and why policies have been adjusted since the Regulation 18 stage and make recommendations for further potential adjustments.
Appraisal of the LPDMP as a whole	Predict and evaluate significant effects of the Pre-submission LPDMP

N.B. Specific policies are referred to only as necessary within the narratives below. It is not necessary to give systematic consideration to the merits of every plan policy in terms of every sustainability topic/objective.

9   Appraisal of the LPDMP

9.1   Introduction

9.1.1   The aim of this section is to present an appraisal of Submission LPDMP under the 23 SA topics that comprise the SA framework (see Table 3.1), drawing on the issues and objectives established through scoping, as well wider evidence including that gathered through consultation in 2020.

9.2   Air quality

Reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure

Commentary on policies

9.2.1   Air quality across the Borough is generally good; however, there are two designated Air Quality Management Areas (AQMAs), located at Compton and Shalford, and another known hotspot is along a section of the A3 as it passes through Guildford. Air quality was an important consideration when determining spatial strategy and allocating sites through the LPSS, given the potential for housing growth to generate traffic and, in turn, generate or worsen existing air pollution hotspots.

9.2.2   Taking the topic headings within the LPDMP in turn (which, to reiterate, are the same headings as those used to structure the LPSS) , it is difficult to suggest that new policies under either the Housing or Economy headings give rise to any significant implications for air quality.

9.2.3   Within the Protecting section of the LPDMP **Policy P11** (Air Quality and Air Quality Management Areas) is of central importance, as a means of planning for good air quality. The policy seeks to avoid "*significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value*", includes a particular focus on air quality within AQMAs and also helpful focus on sensitive uses, which the supporting text defines as "*residential properties, schools and nurseries, hospitals, care facilities, and public amenities.*"

9.2.4   Development proposals which have the potential for significant Air Quality Assessment will be required to submit an air quality assessment. Further to this, where an Air Quality Assessment identifies an unacceptable residual impact on air quality, an Emissions Mitigation Assessment is required to detail an appropriate mitigation strategy following the 'Air Quality Avoidance and Mitigation Hierarchy'.

9.2.5   The policy has been notably updated since the Regulation 18 stage, including in response to GBC Regulatory Services, who encouraged an increased focus on air quality outside of AQMAs; also Natural England, who sought to emphasise that air quality impacts extend to sensitive habitats. The policy could potentially 'go further' in respect of spatially defining air quality hotspots, for example the A3 corridor; however, it is recognised that the A3 is discussed under a dedicated heading within the supporting text.

9.2.6   Within the Design section of the LPDMP a number of policies are of note, and generally supportive of air quality objectives, although the significance of any effects is limited. **Policy D4** (Achieving High Quality Design and Respecting Local Distinctiveness) notably sets out the need for a design-led approach to determining appropriate residential densities, which is a notable evolution from the Regulation 18 stage, when a dedicated criteria-based policy was proposed, and 'a more prescriptive policy with minimum densities for specific areas' was tested as a reasonable alternative. The Interim SA Report at the Regulation 18 stage explained that "air quality considerations might potentially be most effectively addressed through a prescriptive approach", namely one whereby the Local Plan prescribes minimum densities for certain locations; however, at the current time it is recognised that national policy calls for a site-by-site design-led approach, and this approach need not lead to tensions with strategic objectives around air quality (see discussion in Box 4.1, above).

9.2.7   Other Design policies of note are as follows:

- **Policy D8** (Public Realm) – the supporting text explains that areas of public realm "are where people choose to spend time", hence air quality is a consideration.

- **Policy D11** (The Corridor of The River Wey & Godalming Navigations) – the corridor is an important area of public realm, particularly within the context of the Guildford urban area.

- The climate change focused policies (**D12-D15**) – there are important links between planning to minimise built environment greenhouse gas emissions and planning for good air quality. Perhaps most notably, there are links between indoor air quality and efforts to ensure thermal efficiency and avoid overheating.

9.2.8   Moving on to the <u>Infrastructure and Delivery</u> policies, of central importance are those aimed at supporting modal shift away from the private car, and supporting electric vehicle charging. There are important cumulative effects, for example mindful of the Sustainable Movement Corridor supported by the LPSS.

9.2.9   With regards to **Policy ID10** (Achieving a Comprehensive Guildford Borough Cycle Network), the aim is to ensure a strategic, borough-wide approach, guided by the established mapped network of routes and also the Guildford Route Assessments Feasibility Study (2020), which details proposed cycling improvements for the main routes identified.

9.2.10   With regards to **Policy ID11** (Parking Standards), *maximum* and expected standards are established for specified areas within the Borough, which is an evolution on the policy approach presented at the Regulation 18 stage (see discussion in Section 7). The new policy also notably sets out that, with the exception of strategic sites, parking standards in Neighbourhood Plans take precedence over those in the Local Plan, which is an important consideration, as Neighbourhood Plans have tended to specify *minimum* standards. As discussed in Section 7, it is difficult to draw overall conclusions on the extent to which the policy is supportive of encouraging modal shift and avoiding traffic congestion hotspots, including because ample parking provision can avoid problematic on-street parking, which can lead to congestion, stop-start traffic and unsafe conditions for cyclists; however, on balance the appraisal in Section 7 favours the preferred option over the identified reasonable alternative.

9.2.11   Finally, there is a need to note open space policies, namely **Policy ID5** (Protecting Open Space) and **Policy ID6** (Open Space in New Developments), recognising that open spaces in urban areas offer an opportunity for people to spend time away from sources of air pollution. The introductory text to Policy ID6 notably explains: *"The primary purposes of open space are for sport, recreation and amenity but with appropriate design many areas of open space provide further benefits in line with other… policies…"*

Appraisal of the Pre-submission LPDMP

9.2.12   The Pre-submission LPDMP supports the provisions of the LPSS with supplementary and more detailed guidance with the aim of both avoiding and mitigating poor air quality. Overall **positive effects** are anticipated. No specific recommendations are made at this stage, although certain key policies – notably Policy P11 (Air Quality and Air Quality Management Areas) and Policy ID11 (Parking Standards) – warrant further scrutiny, from an air quality perspective, through consultation and examination.

9.3 Biodiversity

Conserve and enhance biodiversity, geodiversity, and the natural environment

Commentary on policies

9.3.1   Biodiversity is a key matter for strategic planning in the Borough, with a need to protect and enhance key areas of habitat and functional ecological connectivity between areas of habitat at landscape scales, including the Thames Basin Heaths, the North Downs and the River Wey corridor. For the LPDMP, the key issue relates to protecting and enhancing biodiversity within development sites, including with a view to securing an overall net gain, as measured using the established Defra Biodiversity Metric (which allows for net gain to be achieved via offsite measures, where it demonstrably cannot be achieved onsite).

9.3.2   Taking the topic headings within the LPDMP in turn, it is difficult to suggest that new policies either under the <u>Housing</u> or <u>Economy</u> headings give rise to any significant implications for biodiversity. Within the <u>Protecting</u> section of the LPDMP there are two policies of central importance.

9.3.3   Beginning with **Policy P6/P7** (Biodiversity in New Developments), this proposes a stringent approach in response to the local situation. A headline requirement is to require qualifying development schemes to achieve "*a net gain of at least 20 per cent*", thereby going beyond the emerging requirements of the Environment Bill,[29] which requires a minimum 10% net gain. The policy also notably sets out that schemes not captured by the net gain requirement should "*seek maximum biodiversity gain and to follow the mitigation hierarchy*". The policy also represents a positive, locally defined approach in respect of:

- Taking a strategic approach to biodiversity net gain – the policy specifies that calculations should be undertaken with a focus on "local priorities", and there is a particular emphasis on securing the achievement of objectives for the defined network of Biodiversity Opportunity Areas (BOAs).

  It is recommended that the policy could reference the possibility of other areas of biodiversity constraint and/or opportunity being established in the future, building upon the BOA network, noting that a county-level Local Nature Recovery Strategy (LNRS) is in preparation.

- Following the mitigation hierarchy – this is a long established and centrally important principle that takes on added importance at the current time, as approaches and methods in respect of planning for biodiversity net gain are evolving nationally. The need to follow the mitigation hierarchy is prominent within point (1) of the policy, and principles are set out within the supporting text.

- Additionality – is an important principle that must underpin biodiversity net gain strategy, in that there must be confidence that any habitat creation or enhancement that is relied upon when calculating/demonstrating net gain would not have happened in any case, in the absence of the development. This is a particular issue for Guildford Borough, given the need for many development proposals to provide Suitable Alternative Natural Greenspace (SANG). Supporting text explains: "*Habitat creation or enhancement on SANGs will only be considered BNG measures (rather than ordinary SANG works) where they provide measurable additionality over and above the minimum requirements of the SANG…*"

- Other specifics in respect to net gain approaches and methods – most notably, the policy specifies that: "*New habitats and habitat improvements that contribute towards the achievement of biodiversity net gain are required to be secured and maintained for at least 30 years...*" The importance of management plans to secure long term management and maintenance of habitat was highlighted by the Environment Agency through consultation and, in response, the supporting text sets out details of a proposed approach that emphasises the need for the plan to be "proportionate to the scale of the development".

- Ensuring that biodiversity is addressed in an integrated manner – for example specifying that: "*Planting and landscaping schemes, open spaces, Sustainable Drainage Systems (SuDS) and Natural Flood Management measures are expected to incorporate species, habitats and management regimes that provide best biodiversity benefit as set out in BOA policy statements and other strategies.*"

  It is also noted that this increased focus on the water environment is proposed in response to points raised by the Environment Agency through consultation. The Environment Agency also sought an increased focus on invasive species, and the new policy now includes a significant focus on this issue.

9.3.4   With regards to **Policy P8/ 9** (Protecting Important Habitats and Species), a focus is setting out locally specific issues and opportunities in respect of:

- Irreplaceable habitats – importantly, the policy sets out that: "*A habitat will be considered to be irreplaceable if it meets the definition in the NPPF glossary or guidance issued by the Surrey Nature Partnership, or if it is identified as irreplaceable in the Local Nature Recovery Strategy, or it is on land identified in an established inventory, such as the Revised Ancient Woodland Inventory (RAWI).*" The supporting text includes a non-exhaustive list of irreplaceable habitats, which includes unmodified rivers in response to a request received from the Environment Agency.

- Ancient woodland and significant trees – development leading to pressure on ancient woodlands (notably recreational pressure and use as a cut through) is understood to be a key issue locally. Protection of ancient woodlands is also a key issue nationally at the current time, with an amendment to the Environment Bill having passed in the House of Lords on 15th September 2021, that will now see "the ancient woodland standard" set out within the legislation, which features a requirement for a 50m buffer between development sites and ancient woodlands.

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[29] Defra (2019) The Environment Bill 2020 and Bill documents (including impact assessments) [online] available at: https://www.gov.uk/government/publications/environment-bill-2020

- Priority species and habitats – again, the policy sets out a need to take account of emerging strategies, which is appropriate in the context of the emerging Environment Bill, the Surrey LNRS etc.[30]

9.3.5 The two Protection policies focused on the water environment are also of key relevance to the achievement of biodiversity objectives, namely:

- **Policy P12** (Water Quality, Waterbodies and Riparian Corridors) – there is a focus on the Wey corridor, with the supporting text explaining: *"The River Wey & Godalming Navigations are owned and managed by the National Trust. Parts of the Wey Navigation are waterbodies that are subject to the [Water Environment Regulations; WER]. The National Trust places a priority on the conservation of the historic environment whilst respecting the needs of those using or wishing to use the Navigations for leisure purposes. There may be instances where this priority conflicts with achieving WER objectives, for example where the conservation of historic wharves and artificial moorings prevents the naturalisation of riverbanks, or where improvements to recreational access may have impacts on ecology."*

- **Policy P13** (Sustainable Surface Water Management), which set out that *"SuDS are required to be considered from the earliest stage of site design to ensure they are fully integrated into the development and that the greatest multifunctional benefits are realised."* The supporting text then goes on to set out a clear explanation of how multifunctional benefits, including biodiversity-related, can be achieved in practice, including by presenting a table summarising Surrey County Council guidance – see Figure 9.1.

Figure 9.1: Guidance on SuDS techniques, including with a view to supporting biodiversity

Sustainability Level	SuDS Technique	Flood Reduction	Pollution Reduction	Wildlife & Landscape Benefit
MOST SUSTAINABLE (PREFERRED)	**Green/Living Roofs & Walls**	✓	✓	✓
	Infiltration: Infiltration trenches & basins Soakaways: (standard or crate system)	✓	✓	✓
	Filter strips and Swales	✓	✓	✓
	Basins and ponds: Wetlands Balancing Ponds Detention Basins Retention Basins Conveyance swales	✓	✓	✓
	Permeable Surfaces & filter drains: Gravelled areas Porous paving	✓	✓	
LEAST SUSTAINABLE	**Tanks & Piped Systems:** Crated Attenuation Tanks Oversize pipes	✓		

Source: SuDS Design Guidance, Surrey County Council

9.3.6 Finally, there is a need to note **Policy P14** (Regionally Important Geological / Geomorphological Sites) recognising the close links between protection of these sites and sites designated for biodiversity value. The policy sets out that there are ten such designated sites in the Borough, which are to be shown on the Local Plan Policies Map, and afforded protection in-line with the proposed policy criteria.

9.3.7 Moving on to the <u>Design</u> section of the LPDMP a number of policies are of note, and generally supportive of biodiversity objectives, although the significance of any effects is limited.

9.3.8 A stand-out policy is **Policy D11** (The Corridor of The River Wey and Godalming Navigations), which sets out a detailed policy framework recognising the strategic importance of the corridor. The challenge is to balance a wide range of objectives for the corridor, which have the potential to generate tensions. In respect of biodiversity objectives, the supporting text notably explains:

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[30] N.B. the appraisal of a working draft version of the LPDMP **recommended** that the policy might be reorganised to make clear that ancient woodland is an irreplaceable habitat of particular importance in the local context; and that there could be benefit to the supporting text defining priority habitat and linking the local definition to the nationally available dataset of priority habitat (at magic.gov.uk), as well as the associated National Habitat Network dataset, as these datasets are widely used starting point for environmental planning (despite limitations). This recommendation was subsequently actioned.

"From an ecological perspective, successful development along the Corridor needs to be sensitive to this context and habitat enhancement opportunities should be sought. Applications are also expected to have consideration to Policy P12: Water Quality, Waterbodies and Riparian Corridors, Policy P6/7: Delivering Biodiversity and Policy 10a: Dark Skies and Light Impact."

9.3.9 A final Design policy of note is **Policy D9** (Residential infill development), particularly its criteria dealing with backland development. It is noted that the supporting text does not discuss the biodiversity value of gardens, unlike other Housing policies, and so it is recommended that brief discussion is added, perhaps to include an emphasis on mature trees and garden ponds.

9.3.10 Finally, with regards to the Infrastructure and Delivery polices, none give rise to significant implications for the achievement of biodiversity objectives, recalling that the adopted LPSS includes Policy ID4 (Green and Blue Infrastructure). There will be a need to maintain a watching brief – over the course of the plan-finalisation process - in respect of local green and blue infrastructure strategy, recognising the likely emergence of a Local Nature Recovery Strategy for Surrey in the near future.

Appraisal of the Pre-submission LPDMP

9.3.11 The Pre-submission LPDMP proposes a detailed and spatially defined policy framework to reflect latest understanding of key issues and opportunities locally. Whilst it is recognised that the LPDMP does not set spatial strategy in respect of growth, or allocate sites for development, it is still possible to conclude that the plan should lead to **significant positive effects** on the biodiversity baseline. It will be important to ensure that policies are updated, if necessary, prior to being finalised, to reflect the latest position in respect of legislation, policies and strategies nationally and at the Surrey-scale. A minor recommendation is made in respect of protecting the biodiversity value of gardens.

9.4 Climate change adaptation

Build resilience and adapt to the impacts of climate change and extreme weather events such as flood, drought and heat risks particularly on groups more vulnerable to the effects of climate change

Commentary on policies

9.4.1 Climate change adaptation is highly cross-cutting topic, with many if not the majority of policies within the LPDMP of relevance to some extent. This discussion here aims to focus on key policies, also mindful that flood risk (a primary climate change adaptation consideration) is a focus of stand-alone discussion below.

9.4.2 Taking the topic headings within the LPDMP in turn, policies under the Housing and Economy headings give rise to limited implications for climate change adaption. The need to plan and design new communities and buildings to avoid over-heating risk is a climate change adaptation priority nationally; however, this matter is a focus of a separate stand-alone policy, discussed below.

9.4.3 With regards to the Protecting policies, it is clearly the case that one of the reasons why there is a need to protect environmental assets is so as to ensure resilience to the anticipated impacts of climate change; for example, the water environment is set to come under pressure due to higher temperatures and altered rainfall patterns. In this light, the Protecting policies are broadly supported, and no tensions are apparent.

9.4.4 The centrally important policies are those presented under the Design heading, in particular those that aim to supplement adopted LPPS Policy D2 (Climate Change, Sustainable Design, Construction and Energy), which requires all development to be fit for purpose and remain so into the future by incorporating adaptations that avoid increased vulnerability and offer resilience to the full range of expected climate change impacts. It requires adaptation information to be provided in a Sustainability Statement for major development or within proportionate sustainability information for non-major development.

9.4.5 Beginning with **Policy D12** (Sustainable and Low Impact Development), the first point to note is the proposal to supplement the LPPS Policy D2 building water efficiency standard with the following requirement: *"New developments are expected to incorporate measures to harvest rainwater and conserve water resources and, where possible, water recycling/reuse systems."*

9.4.6   Secondly, there is a need to consider the climate change adaptation implications of measures aimed at securing built environment decarbonisation. Specifically, measures aimed at securing decarbonisation by taking a 'fabric first' approach to building design and also seeking to minimise embodied carbon in buildings do need to be scrutinised from a perspective of ensuring that buildings are not at risk of overheating under climate change scenarios involving higher temperatures and more heat waves.

9.4.7   The centrally important policy is then **Policy D13** (Climate Change Adaptation), which requires design for "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." There is also a particular focus on vulnerable groups (e.g. the elderly), which is supported, as is support for specific measures and techniques that align with the 'cooling hierarchy' (including clear support passive measures ahead of air conditioning). Schemes are also required to demonstrate how the urban heat island effect will be addressed, including through materials, layout, landform, massing, orientation and landscaping, as well as the retention and incorporation of green and blue infrastructure as far as possible.[31]

9.4.8   Other Design policies are also of relevance, including those focused on the historic environment, recognising that historic assets can be vulnerable to increased temperatures, flooding and other extreme weather events; and also recognising that it can be a challenge to retrofit or otherwise modify historic buildings with a view to securing climate change objectives. This is a particular issue in respect of climate change mitigation / decarbonisation (discussed below), but adaptation / resilience is also a consideration.

9.4.9   Finally, there is a need to note the Infrastructure and Design policies focused on open spaces, namely **Policy ID5** (Protecting Open Space) and **Policy ID6** (Open Space in New Developments), recognising that areas of open space will take on added importance under climate change scenarios that see higher temperatures and an increased incidence of heat waves. The introductory text to Policy ID6 explains that: *"The primary purposes of open space are for sport, recreation and amenity but with appropriate design many areas of open space provide further benefits in line with other local plan policies…"*

Appraisal of the Pre-submission LPDMP

9.4.10   The Pre-submission LPDMP includes a climate change adaptation focused policy dealing with the design of communities and buildings, and wide ranging other policies are supportive of a proactive approach to adaptation, including the 'protecting' policies focused on biodiversity and the water environment. The LPDMP is likely to lead to **positive effects**, particularly over the long term, recognising the timescales over which the effects of climate change will be felt. No specific recommendations are made at this stage.

9.5 Climate change mitigation

Mitigate the causes of climate change through reducing emissions of greenhouse gases and efficient use of natural resources

Commentary on policies

9.5.1   Climate change mitigation is a particular focus of the LPDMP, with a number of policies seeking to build upon adopted LPSS Policy D2 (Climate Change, Sustainable Design, Construction and Energy). The conclusion of the SA process undertaken at the time of preparing the LPSS was that "*the plan leads to a reasonably strong likelihood of reduced average per capita CO2 emissions from the built environment, given a focus on strategic scale schemes and the policy requirements set to be put in place*". As such, there is a clear opportunity for the LPDMP to put in place measure that will generate increased certainty around reducing per capita emissions at a rate that aligns established decarbonisation target dates.

9.5.2   Taking the topic headings within the LPDMP in turn, policies under the Housing and Economy headings give rise to limited implications. The need to plan and design new communities and buildings so as to secure built environment decarbonisation (also transport decarbonisation) is a climate change mitigation priority nationally; however, this matter is a focus of a separate stand-alone policy, discussed below.

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[31] N.B. the appraisal of a working draft version of the LPDMP **recommended** that links between design measure aimed at avoiding overheating (in line with the cooling hierarchy) and measures aimed at avoiding the urban heat island effect are clarified as far as possible, recognising that these are relatively new and evolving concepts. Equally, it was recommended that efforts should be made to set policy aimed at design for climate change adaptation in the context of wider policy and planning measures aimed at climate change adaptation, for example in terms of green and blue infrastructure. These recommendations were discussed with GBC officers, leading to a conclusion that technical matters such as this are appropriately covered in SPDs. A Climate Change, Sustainable Design, Construction and Energy SPD was adopted in 2020, and could be updated in the future if necessary.

9.5.3   With regards to the <u>Protecting</u> policies, there are important links between decarbonisation objectives and planning for good air quality (Policy P11) and planning for biodiversity / green infrastructure (Policies P6/7 and P7/8). However, these links are of limited significance, and hence are not a focus of the proposed policies. For example, there is not a major focus on supporting carbon sequestration as part of efforts to secure biodiversity net gain(s), which is considered appropriate.

9.5.4   The centrally important policies are those presented under the <u>Design</u> heading, namely:

- **Policy D12** (Sustainable and Low Impact Development) - requires development proposals to demonstrate how it has followed a fabric first approach to minimising operational built environment emissions, in line with the energy hierarchy, and there is also a focus on non-operational built environment emissions, specifically a focus on minimising the embodied emissions of buildings. For major developments there is a requirement to go a step further, and consider 'lifecycle emissions', which can involve exploring non-operational emissions over-and-above embodied emissions, for example emissions associated with construction, maintenance, retrofit and demolition. It is also noted that embodied carbon is discussed in the supporting text to three further policies.

- **Policy D14** (Carbon Emissions from Buildings) – is a centrally important policy, and hence is a focus of stand-alone discussion within Section 6 of this report. The proposal is to require a 31% reduction on the emissions standards set out within the current Building Regulations for new dwellings, and 27% for other types of buildings, which is supported as a suitably ambitious approach in light of the viability testing work that has been completed as part of the process of preparing the LPDMP. It is noted that these are minimum figures, with the policy and supporting text stating that "applicants are strongly encouraged to improve upon this standard". There can be the potential to 'go further' (for example, the London Plan requires that major schemes achieve a 35% reduction on Building Regulations onsite), although it is important to recall that Local Plan policies that require 'net zero' development (for example the emerging Local Plans for Wokingham and Bracknell Forest) do so in the knowledge that net zero development will very rarely be achieved onsite, but rather will require offsetting.

  The policy also includes a focus on ensuring that buildings are linked to / as part of heat networks as far as possible, and importantly moves the emphasis away from heat networks sourcing heat from Combined Heat and Power (CHP), recognising that CHP is now no longer seen as a low carbon technology for decarbonisation in most contexts, due to decarbonisation of the national grid.

- **Policy D15** (Renewable and Low Carbon Energy Generation and Storage) - provides support for renewables and low carbon energy generation and energy storage development, particularly for community-led initiatives. The policy approach has evolved from the Regulation 18 stage, at which time the Council was exploring the possibility of allocating one or more sites for renewable and low carbon energy development. The current proposed policy approach sets out three criteria to guide future decision-making on any 'windfall' schemes that come forward, importantly setting out that "*where such development is proposed in the Green Belt, climate change mitigation and other benefits will be taken into account when considering whether very special circumstances exist.*"

9.5.5   Other Design policies are also of relevance, including those that are supportive of active and public transport, other modes of 'future mobility' and the switch-over to electric vehicles (EVs). For example, **Policy D8** (Public Realm) sets out that "… *public spaces are expected to consider the opportunity to provide… a mobility hub on its fringes, facilitating access to low carbon and shared modes of transport*". The supporting text defines a mobility hub as "*a recognisable place with an offer of low carbon, public and shared transport modes supplemented with enhanced facilities and information features. A mobility hub is modular in nature and can be tailored to local needs. Example components of a hub could include car club vehicles, bike share, bus stops, cycle parking, an information sign/screen and neighbourhood facilities such as package delivery lockers, café, coworking space and/or mini fitness/play area.*"

9.5.6   **Policy D5** (Protection of Amenity and Provision of Amenity Space) is also of note, with the supporting text explaining that "windows that are overshadowed by buildings, walls, trees or hedges, or that are north-facing, will receive less light. Solar gain should also be optimised to reduce the need for mechanical heating, but with appropriate measures to prevent overheating in line [climate change policies]".

9.5.7   Finally, the Design policies focused on the historic environment are of note, recognising that it can be a challenge to modify historic buildings with a view to securing energy efficiency, heat pumps and/or solar PV. **Policy D17** (Listed Buildings) sets out that "*support will be given to proposals that seek to mitigate the effects of climate change through energy efficiency improvements*" where specified criteria are met.

9.5.8   Moving on to the <u>Infrastructure and Delivery</u> policies, of central importance are those aimed at supporting modal shift away from the private car, and supporting EV charging. There are important points for discussion in respect of **Policy ID10** (Achieving a Comprehensive Guildford Borough Cycle Network) and **Policy ID11** (Parking Standards); however, matters are broadly *as per* those discussed under Air quality.

Appraisal of the Pre-submission LPDMP

9.5.9   The Pre-submission LPDMP includes three decarbonisation focused policies to supplement adopted LPSS Policy D2, which is important given the extent to which understanding of best practice has moved on, for example in respect of the energy hierarchy (a 'fabric' first approach to building design), support for gas CHP and the importance of taking a 'whole lifecycle' approach to building emissions. The LPDMP also presents important policy aimed at minimising transport-related greenhouse gas emissions, although Policy ID11 (Parking Standards) potentially warrants further from a climate change mitigation perspective. Overall, the LMDMP is likely to lead to **positive effects**, although it is difficult to conclude that effects will be 'significant', recognising that climate change mitigation is a global issue, such that local actions can only have limited effects, and recognising the central importance of spatial strategy and site selection (not a focus of the LPDMP). No specific recommendations are made, although further work to explore opportunities to allocate a site, or broad area, for a solar farm would be supported.

9.6   Digital infrastructure

Ensure that the digital infrastructure available meets the needs of current and future generations

Commentary on policies

9.6.1   Adopted LPSS promotes the creation of 'smart places' through Policy D1 (Place Shaping) where design "seeks to achieve high-quality digital connectivity" and "supports technological and digital advances, including the provision of sufficient ducting space for future digital connectivity infrastructure". Fibre To The Premises (FTTP) is encouraged where practical, alongside mobile connectivity and access to services from a range of providers. It is also recognised that extending superfast broadband is one of the priorities set out in the Corporate Strategy, and is a particular priority for rural areas, with Policy E5 (Rural Economy) identifying that the Council will work with partners "to support and improve the provision of internet services where needed in rural areas and enhance digital inclusion in such areas."

9.6.2   The LPDMP does not propose any further thematic policy directly relating to digital infrastructure. The supporting text to **Policy ID8** (Community Facilities) discusses the importance of community centres and hubs being *"adaptable to changing needs. This may include the development of flexible, multi-use spaces with high quality digital connectivity that complement community facilities."* There could be the potential to bring these points out more clearly in the policy, for example in light of a recent Local Government Association study that explores issues and opportunities for rural communities following the Covid 19 pandemic. The study discusses a likely major increase in people working from rural areas, both from home and from shared workspaces, including potentially cafes and "gigapubs".

Appraisal of the Pre-submission LPDMP

9.6.3   The Pre-submission LPDMP includes a very limited focus on digital infrastructure, recognising the policy provisions within the adopted LPSS. Overall **neutral effects** are therefore anticipated. No specific recommendations are made at this stage, although there could be the potential to explore the potential to support rural home working and shared workspaces in rural areas.

9.7   The Economy, rural economy and employment land

Maintain Guildford borough and Guildford town's competitive economic role

Facilitate appropriate development opportunities to meet the changing needs of the economy

Enhance the borough's rural economy

N.B. whilst the SA framework (see Table 3.1) includes three sperate topics covering the economy, the rural economy and employment, and three separate discussions were presented within the Interim SA Report (2020), in 2021 the decision was taken to present a single discussion, in light of the scope of the LPDMP, understanding of the nature of issues/impacts and a desire to ensure conciseness and readability.

9.7.1   The adopted LPSS includes a focus on the achievement of economy and employment land objectives, such that the SA process led to a conclusion of likely significant positive effects.

9.7.2   The LPDMP includes limited additional policy focused on the achievement of economy and employment land objectives, with just one new Economy policy, namely **Policy E11** (Equine-related Development). This policy sets out criteria with a view to avoiding inappropriate equine development, which is important from a rural economy perspective. The proposed policy approach has evolved from the Regulation 18 stage; notably, a new criterion is added aimed at protecting existing viable agricultural uses.

9.7.3   Finally, there is a need to note policies that aim to support the achievement of objectives for Guildford town centre, which is a key location for employment and commerce within the Borough. Perhaps most notable is **Policy ID11** (Parking Standards), which aims to ensure parking provision delivered by new development in the town centre is proportionate to development type/use and promote transport sustainability, and the town centre is also referenced in **Policy D11** (The Corridor of The River Wey and Godalming Navigations) and **Policy ID9** (Retention of Public Houses). **Policy D7** (Advertisements, Hanging Signs and Illumination) is also clearly of relevance, and it is noted that the British Sign & Graphics Association submitted a detailed consultation response at the Regulation 18 stage, highlighting a concern regarding overly prescriptive and restrictive policy. Policy wording updates seek to focus directions on amenity, public safety and principles of good design.

Appraisal of the Pre-submission LPDMP

9.7.4   The Pre-submission LPDMP includes just one economy-focused policy, on equine-related development, which is an important policy from a perspective of supporting the achievement of rural economy objectives (also, in respect of rural economy objectives, see discussion above, under Digital infrastructure). Other policies are also of relevance to the achievement of economy-related objectives, including the proposed policy on parking standards, which includes a particular focus on parking within Guildford town centre. Overall **neutral effects** are anticipated, and no specific recommendations are made at this stage.

9.8   Education

Improve levels of education and skills in the population overall

Commentary on policies

9.8.1   Providing for schools capacity was a key matter that fed-in to preparation of the LPSS. Most notably, the strategic allocations at Gosden Hill Farm (Policy A25), Blackwell Farm (Policy A26), the former Wisley Airfield site (Policy A35) each seek to deliver new facilities, including a secondary school in each case, and contributions to the expansion of Ash Manor Secondary School are also required at the 'Land to the south and east of Ash and Tongham (Policy A31). Policy A24 (SARP now called Weyside Urban Village) also requires a financial contribution to enable expansion of Weyfield Primary Academy (also, all other strategic greenfield sites make provision for new/expanded primary schools).

9.8.2   The only LPDMP policy of note is **Policy ID8** (Community Facilities), which sets out policy to guide new, expanded or replacement community facilities, including schools, and also notably policy on ancillary uses, such as cafes. The supporting text explains that community facilities must *"reflect high-quality, safe, accessible and inclusive design to meet the needs of all users"*, and this is certainly the case for schools. As well as design, the policy also deals with the location of community facilities, including schools, setting out the need for good accessibility (minimising car trips), and giving particular support for co-location with other facilities, including within a local centre or 'community hub'.

9.8.3   Also of note is new supporting text, added since the Regulation 18 stage as follows: "The Council requires contributions via s106 agreement toward community facilities, such as for new or expanded school provision, from related new development in line with LPSS Policy ID1 and the NPPF." This is an important point of clarification.

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9.8.4   Policy ID8 reflects a proactive approach to planning for community facilities, including schools, and so it is fair to conclude that the LPDMP will lead to **positive effects**, albeit effects are clearly very minor in comparison to the effects of the LPSS.

9.9 Flood risk

Reduce the risk of flooding and the resulting detriment to public well- being, the economy and the environment

Commentary on policies

9.9.1   Taking the topic headings within the LPDMP in turn, policies under the Housing and Economy headings give rise to limited or no implications for flood risk. There is no reason to suggest that any of the proposed policy approaches could lead to tensions with objectives around minimising flood risk.

9.9.2   Under the Protecting heading, key policies are:

- **Policy P12** (Water Quality, Waterbodies and Riparian Corridors) – the policy aims to recognise the wide range of issues, and sometimes competing objectives, that are associated with river corridors in particular. For example, the supporting text explains: *"The National Trust places a priority on the conservation of the historic environment whilst respecting the needs of those using or wishing to use the Navigations for leisure purposes. There may be instances where this priority conflicts with achieving WER objectives, for example where the conservation of historic wharves and artificial moorings prevents the naturalisation of riverbanks, or where improvements to recreational access may have impacts on ecology."* Naturalisation of riverbanks is important from a flood risk perspective, hence the following policy criterion is supported: *"Development proposals are required to identify opportunities for Natural Flood Management, creating wetland features and reconnecting rivers with their floodplains in order to restore natural processes, enhance biodiversity and help manage flood risk."*

- **Policy P13** (Sustainable Surface Water Management) requires schemes *"to follow the discharge hierarchy and prioritise the use of Natural Flood Management (NFM) and Sustainable Drainage Systems (SuDS) for all surface water that is not captured for later use. Alternative drainage systems may be used only if there is clear evidence that SuDS would be inappropriate"*. The measures seek to maximise absorption and slow down surface water. All development is expected to follow guidelines for drainage and maximise the use of permeable surfaces. Of note, all development proposals are required to intercept as much rainwater and runoff as possible, including runoff from outside the site.

9.9.3   Within the Design section, the key policy of note is **Policy D13** (Climate Change Adaptation) which requires schemes to *"demonstrate adaptation for more frequent and severe rainfall events"* through measures which include natural flood management measures and planting and landscaping schemes which maximise absorption and slow down surface water. There is clear cross over here with Policy P13, but this is likely to be appropriate, given that planning for surface water drainage is a long established planning matter, whilst planning for climate change adaptation / resilience is a new and emerging subject.

9.9.4   Also of note is **Policy D11** (The Corridor of The River Wey and Godalming Navigations). In a similar fashion to Policy P12, the policy seeks to deal with the wide ranging and sometimes competing interests associated with the water, and includes the following criterion in respect of flood risk: *"[Proposals are required to] integrate flood risk mitigation measures where the design and material palette are responsive to the character and the site's immediate context."*

9.9.5   Moving on to the Infrastructure and Delivery policies, **Policy ID5** (Protecting Open Space) and **Policy ID11** (Parking Standards) have implications for surface water drainage and, in turn, flood risk; however these are indirect and likely minor.

9.9.6   Finally, it is important to note cross references to adopted LPSS Policy P4 (Flooding, flood risk and groundwater protection zones) under the following LPDMP policies: Policy H5 (Housing Extensions and Alterations including Annexes); Policy P12 (Water Quality, Waterbodies and Riparian Corridors); Policy P13 (Sustainable Surface Water Management). These additions reflect requests made by the Environment Agency through the Regulation 18 consultation in 2020.

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9.9.7   The additional policy provisions relating to the management of surface water should contribute to minimising flood risk, particularly under climate change scenarios, and policies focused on balancing sometimes competing issues and interests associated with river corridors are also supported, from a flood risk perspective. Overall minor **positive effects** are anticipated.

9.10 Health

Facilitate improved health and well-being of the population, enabling people to stay independent and reducing inequalities in health

Commentary on policies

9.10.1   Planning for good health is a key issue for the LPDMP. Taking the topic headings within the LPDMP in turn, policies either under the <u>Housing</u> and <u>Economy</u> headings give rise to limited implications. However, it is important to consider the links between housing and health objectives. For example, in respect of **Policy H5** (Housing Extensions, Alterations including Annexes), there are clear health and wellbeing benefits associated with enabling additional living space for growing households or to adapt homes to meet changing needs. The supporting text to the policy explains:

"High house prices in a competitive housing market have had the impact of people choosing to remain in their existing home and extend, renovate or improve it to meet their needs rather than move. Grown-up children now tend to live in the family home for longer due to the unaffordability of owner occupation, ineligibility for social housing or high renting costs… Older people are more likely to have a long-term health problem or disability and consequently may need to adapt their home or move into accommodation with their family. The necessity to work from home in recent years has also led to rethinking and reconfiguring how we use our homes..."

9.10.2   Moving on to the <u>Protecting</u> and <u>Design</u> policies, a number have a clear focus on supporting the achievement of health and wellbeing objectives, perhaps most notably:

- **Policy P11** (Air Quality and Air Quality Management Areas) – is discussed above, under the Air quality heading. There is a clear requirement that "*development proposals must not result in significant adverse impacts on sensitive receptors, including human health*".

- **Policy D4** (Achieving High Quality Design and Respecting Local Distinctiveness) – deals with density, setting out that: "*Development proposals are expected to make efficient use of land and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting.*" There are links between density and health objectives, for example density has implications for access to private gardens and other outdoor space. The supporting text explains: "*National policy requires the promotion of… an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions…*"

- **Policy D5** (Protection of Amenity and Provision of Amenity Space) amongst other things deals with expectations around provision of gardens, with the supporting text explaining: "*Given the significant benefits, there is an expectation that all new build development proposals provide private amenity space unless it can be demonstrated that it is not appropriate. For new housing schemes this will be in the form of private gardens. Whilst there may be instances whereby communal gardens are considered to be the most appropriate form of provision, this is likely to be relatively rare and will need to be justified...*"

- **Policy D10** (Noise Impacts) sets out detail on the expected approach to Noise Impact Assessment.

- **Policy D13** (Climate Change Adaptation) – there is a need to strike a fine balance between efforts to ensure thermal efficiency whilst also enabling ventilation to avoid concerns around overheating, poor indoor air quality and ventilation. This matter is covered in some detail within the supporting text to the policy, which explains: "*Passive design prevents excessive heat from accumulating. Passive cooling combats overheating by allowing unwanted heat to escape during cooler periods, e.g. at night or on cooler days, without the use of mechanical systems that generate carbon emissions. Where passive measures alone would not be adequate, mechanical ventilation systems should be favoured over mechanical cooling as cooling systems use more energy, can simply displace heat from one area to another, and some cooling systems rely on refrigerants that are potent greenhouse gases. Mechanical cooling should be an option of last resort and, where applied, should be localised to only the parts of the building that are likely to overheat. Mechanical cooling may be acceptable where it forms part of a high efficiency tri-generation heat network that offers low carbon heating, power and cooling and results in carbon savings over alternative options.*"

9.10.3   Finally, the <u>Infrastructure and Delivery</u> policies also have important implications for the achievement of health and wellbeing objectives, including:

- **Policy ID5** (Protecting Open Space) aims to provide additional detail and clarity in relation to protecting open space, following on from LPSS Policy ID4 (Green and Blue Infrastructure). The Policy provides

protection for existing spaces that are not surplus to requirements, noting that there may be a requirement for open space even if quantitative provision of that type of space in the local area exceeds the minimum standards in the Open Space, Sport and Recreation Assessment.

- **Policy ID6** (Open Space in New Developments) sets out clear criteria to inform a decision on the type of open space that must be provided as part of development schemes, with criteria primarily relating to: A) existing provision in the area; and B) the size of the development scheme. Open space is also required to "*be multi-functional space that delivers a range of benefits, including biodiversity gains, flood risk management, and climate change measures".* Design is expected to promote social inclusivity and "*support and enhance the existing rights of way network, providing new footpaths and cycle links where possible*" all to the benefit of resident health and wellbeing.

- **Policy ID8** (Community Facilities) recognises that community facilities are integral to promoting healthy, inclusive and safe communities, setting out clearly that facilities "will be retained for the benefit of the community" unless certain criteria are met. There is a focus on co-location of facilities (potentially as 'community hubs'), and clarity on the importance of co-locating facilities with a particular aim of supporting health and wellbeing objectives could be warranted.

- **Policy ID10** (Achieving a Comprehensive Guildford Borough Cycle Network) is supportive of active travel and therefore health and wellbeing objectives. The Policies Map identifies specific routes where the Council will undertake or promote measures to encourage cycling and, following consultation, greater emphasis is placed on utility cycling as well as leisure cycling to support greater modal shift.

- **Policy ID11** (Parking Standards) has implications for health and wellbeing, as per the discussion above, under Air quality, it is difficult to draw overall conclusions on the extent to which the policy is supportive of encouraging modal shift and avoiding traffic congestion hotspots, including because ample parking provision can avoid problematic on-street parking, which can lead to congestion and discourage cyclists.

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9.10.4   Wide ranging policies have clear positive implications for the achievement of health and wellbeing objectives and few, if any, tensions are highlighted, although there is a need to be mindful of health implications of policies dealing with density and car parking. A particularly proactive approach is taken to supporting community facilities, open space and a comprehensive cycle network, with strong positive implications for the achievement of health and wellbeing objectives. Overall, **significant positive effects** are anticipated, although policies will warrant further scrutiny to ensure that all opportunities will be fully realised; for example, there could be merit to further exploring the health and wellbeing opportunity associated with delivering new 'community hubs' in the Borough.

9.11 Historic environment

Protect, enhance, and where appropriate make accessible, the archaeological land historic environments and cultural assets of Guildford, for the benefit of residents and visitors

Commentary on policies

9.11.1   It is important to reiterate that the LPDMP does not allocate sites or broad locations, which reduces the potential to draw conclusions on significant effects. However, the plan does present a range of policies aimed at conserving and enhancing the historic environment, plus there is a need to question whether any of the other proposed development policies could lead to tensions with historic environment objectives.

9.11.2   Beginning with the policies either under the Housing and Economy headings, whilst the potential for tensions with historic environment objectives exists, any concerns are reduced on the basis of the policy wording within the policies themselves, as well as policy under other headings within the LPDMP and LPSS Policy D3 (Historic Environment). The following policies are of particular note:

- **Policy H5** (Housing Extensions, Alterations including Annexes) – specifies that proposals must *"respect the existing context, scale, design, appearance and character of the adjacent buildings and immediate surrounding area"* and *"take into account the form, scale, height, character, materials and proportions of the existing building".* The supporting text explains that:

  "It is particularly important that special care and attention is taken when altering a listed building or building in a conservation area, as addressed by other policies within this plan."

- **Policy H6** (Housing Conversion and Sub-division) – the policy seeks to avoid "unacceptable impact on the character of the immediate locality" and the supporting text explains that:

  "A well designed and executed scheme benefits not only the property and its occupants but the locality. It is particularly important that special care and attention is taken when altering a listed building or a building in a conservation area."

9.11.3   It is also important to note that, following Regulation 18 consultation, the decision was taken to delete the previously proposed policy on housing density, and instead require housing density considerations to be integrated as part of the design process, allowing flexibility in determining appropriate densities within the immediate and wider context of the site whilst respecting local character. These updates reflect concerns highlighted by Historic England through the consultation process.

9.11.4   With regards to the <u>Protecting</u> policies, these have limited implications for the historic environment. A primary consideration is **Policy P12** (Water Quality, Waterbodies and Riparian Corridors) with the supporting text explaining: *"The River Wey & Godalming Navigations are owned and managed by the National Trust. Parts of the Wey Navigation are waterbodies that are subject to the WER. The National Trust places a priority on the conservation of the historic environment whilst respecting the needs of those using or wishing to use the Navigations for leisure purposes. There may be instances where this priority conflicts with achieving WER objectives, for example where the conservation of historic wharves and artificial moorings prevents the naturalisation of riverbanks, or where improvements to recreational access may have impacts on ecology. Decision makers will take this situation into account when considering applications for development…"*

9.11.5   The biodiversity focused policies also have broadly positive implications for the historic environment. For example, in response to a consultation response received from Historic England in 2020, the supporting text to **Policy P8/P9** (Protecting Important Habitats and Species) now defines "*stretches of river that have had little historic modification*" as irreplaceable habitats.

9.11.6   A total of eight Design policies are then focused specifically on protecting and enhancing the historic environment. Policies have been adjusted, since the Regulation 18 stage, in response to comments received from Historic England, and it is clearly the case that the combined effect of the policies should be to ensure a proactive and positive approach to conserving and enhancing the historic environment, building upon adopted LPSS Policy D3 (Historic Environment). The following is a brief overview:

- **Policy D9** (Residential infill development) deals with backland development, which can be a significant component of windfall supply. It is noted that the supporting text does not discuss the historic environment value of gardens, unlike Housing policies, and so it is recommended that brief discussion is added, perhaps to include an emphasis on mature trees (e.g. Victorian planting).

- **Policy D16** (Designated Heritage Assets) sets out a strategy for the conservation and enhancement of all designated heritage assets which includes the requirement for all development proposals affecting designated heritage assets or their settings, "*to be supported by an evidence-based Heritage Statement*" proportionate to the assets' importance. The policy seeks to restrict development that could result in loss of significance, and support development that secures the future conservation of a heritage asset.

- **Policy D17** (Listed Buildings) further provides detail for development proposals affecting Listed Buildings, including requirements for any alterations, additional or other works, directly, indirectly or cumulatively affecting the special interest of a Listed Building, and measures to address both climate change adaptation and mitigation through improvements to building fabric.

- **Policy D18** (Conservation Areas) seeks to preserve and enhance character and local distinctiveness, ensuring due regard is given to Conservation Area Appraisals, key views and the use of appropriate materials in such areas to maximise the potential for positive contributions in new development.

- **Policy D19** (Scheduled Monuments) and **D19a** (Registered Parks and Gardens) seek to add more operational detail in relation to key designated assets, resisting their loss or development which is detrimental to their significance, and inclusive of the requirement for archaeological evaluation/ assessment where appropriate.

- **Policy D20** (Non-Designated Heritage Assets) requires that proposals affecting Non-designated Heritage Assets and their setting are required to be supported by an evidence-based statement of significance, where the level of detail provided within the statement is *"proportionate to the asset's importance and sufficient to facilitate an informed assessment of the significance of the asset and its setting, and the impact of the proposed development on that significance."*

9.11.7   It is difficult to suggest any potential gaps in the proposed policy framework. Perhaps an outstanding question is whether additional policy could be prepared in respect of historic character, as understood at a variety of scales, e.g. at the street or neighbourhood level within urban areas, or at a landscape scale. However, it is recognised that evidence is a barrier to setting policy. One idea could be to encourage Neighbourhood Groups to build an evidence base for their Local Area, which then might then feed into both spatial strategy / site selection and development management policy in Neighbourhood Plans.

9.11.8   Aside from the historic environment focused policies, several other Design policies are also of relevance to historic environment objectives. Perhaps most notably, **Policy D4** (Achieving High Quality Design and Respecting Local Distinctiveness) amongst other things, sets out that: *"The use of innovative design approaches, including use of materials and construction techniques, will be supported where this presents an opportunity to create new or complementary identities that contributes to and enhances local character."* Also of note is **Policy D6** (Shopfront Design and Security), which explores a range of issues and objectives, for example explaining: *"Materials, detailing, craftsmanship and finishes are equally important in achieving high quality shopfront design and should be carefully chosen on the basis of their appropriateness to the character of the area; their visual sympathy with the architectural form and composition above; their long-term durability and their environmental sustainability."*

9.11.9   Finally, the <u>Infrastructure and Delivery</u> policies also have implications for the achievement of historic environment objectives. The most direct implications are likely associated with **Policy ID5** (Protecting Open Space); however, neither the policy or supporting text includes an explicit focus on historic environment issues and objectives. At the Regulation 18 stage the policy included a criterion making reference to the need to account for historic value, which was supported by Historic England through the consultation (*"Agree, in as far as the policy relates to historic character of open spaces; e.g. some non-designated public open spaces have surviving historic character, in whole or in part, such as Stoke Park, which it would be appropriate to protect"*); however, the proposal now is for the policy to focus on recreational value. The Council's consultation statement explains: *"Other Local Plan policies protect other types of space that are important for conservation and heritage reasons. We have therefore deleted this clause from the policy and provided further clarification in the reasoned justification of the policy's role, which is to deal with the protection of open space for recreational value."*

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9.11.10   The proposed suite of LPDMP policies reflects a detailed, proactive and positive approach to conserving and enhancing the historic environment, and it is particularly noticeable that policies have been developed to carefully reflect detailed consultation responses received from Historic England at the Regulation 18 stage. There is much cross-referencing of links to historic environment objectives within supporting text of policies where the primary focus is not historic environment related, although it is recognised that there could potentially be even more (e.g. under the policy on protecting open space), albeit this would lead to additional text, with negative implications for conciseness and readability. It is also possible to suggest that there might feasibly be further emphasis on protecting and enhancing historic character at strategic 'character area' scales; however, it is recognised that evidence is a barrier to setting policy in this respect (there may be an opportunity to gather evidence through Neighbourhood Plans). Overall **positive effects** are anticipated.

9.12 Housing

Meet housing requirements of the whole community and provide housing of a suitable mix and type

Commentary on policies

9.12.1   Whilst the LPDMP does not allocate sites or broad locations for new housing, it includes policies that will guide the mix of housing that comes forward, on both allocated and windfall sites, and also policies that deal with householder applications, including with the aim of ensuring existing homes best meet the needs of occupants. Also, it is clearly the case that all DM policies can have implications for development viability and, in turn, housing delivery; however, it is not the intention of this appraisal to explore matters in respect of viability in any detail, noting that a Viability Assessment has been completed for the LPDMP.

9.12.2   The <u>Housing</u> policies lead to wide ranging implications for the achievement of housing related objectives, and implications that are broadly positive. The following bullet points present a brief overview:

- **Policy H5** (Housing Extensions, Alterations and Annexes) presents detailed criteria in relation to housing extensions and alterations to enable home adaptation to meet changing circumstances.

- **Policy H6** (Housing Conversion and Sub-Division) seeks to manage the impacts of housing conversions and sub-divisions. The policy provisions support high-quality housing providing that certain criteria are met, for example in respect of sufficient amenity space, parking and cycle storage. The supporting text explains that: *"Smaller housing units, such as flats, studio flats and bedsits can provide a valuable source of accommodation to meet the needs of some of the local population. They can offer a more affordable way to live in Guildford borough, particularly for students, young adults, low paid workers or key workers."*

- **Policy H7** (Review Mechanisms) deals with the important matter of ensuring that, where proposals are being considered that at the outset may not meet Local Plan affordable housing requirements, there is a mechanism to review viability of the scheme with the aim of achieving policy compliance over time. The supporting text explains:

  "The Council recognises that the property market fluctuates over time. Changes to costs and values may result in scheme viability being different from what was considered at the planning application stage. This is particularly the case for schemes that deliver over a number of years where viability may be more likely to differ with what was originally reflected at the planning application stage. This presents an opportunity for schemes with improved viability to achieve a greater contribution toward the Council's affordable housing requirement than was the case at the point of determination of the application."

- **Policy H8** (First Homes) deals with First Homes, which are now the Government's preferred discounted market tenure and are required under national Planning Practice Guidance (PPG) to account for a minimum of 25% of all affordable homes delivered by developers through section 106 planning obligations, on new planning applications received after 28 June 2021. The supporting text explains:

  "… First Homes delivery will not impede the requirement in LPSS Policy H2: Affordable Homes and the Council's Housing Strategy that 70% of all affordable homes delivered through affordable housing contributions will be for affordable rent, with First Homes requirements being delivered within the 30% required under the policy as being for other forms of affordable housing within the NPPF definition."

9.12.3   With regards to the <u>Economy</u> and <u>Protecting</u> policies, it is difficult to suggest significant implications for the achievement of housing objectives. The requirement for 20% biodiversity net gain (**Policy P6**) will lead to developers having to bear an additional cost, but the LPDMP Viability Assessment has established that this will not impact viability to any significant extent (i.e. to an extent whereby achievement of other policy objectives, including in respect of meeting housing needs, would be unduly compromised).

9.12.4   Equally, the <u>Design</u> policies have wide ranging implications for housing objectives, and **Policy D14** (Carbon Emissions from Buildings) is notable as a policy that has been a particular focus of viability testing, recognising that the proposal is to require developers to build to a standard that exceeds the minimum requirements set out in current Building Regulations, which will result in a need to bear additional costs.

9.12.5   It is also appropriate to draw particular attention to **Policy D4** (Achieving High Quality Design and Respecting Local Distinctiveness), which seeks appropriate densities informed by a design-led approach that considers context and local character, to support the delivery of high-quality housing. Again, development density can be an important factor impacting on development viability, and in turn deliverability / delivery timescales. The policy has been notably adjusted since the Regulation 18 stage to ensure clear consistency with the 10 characteristics of well-designed places from the National Design Guide, and so is not thought likely to pose any major concerns to the development industry.

9.12.6   A final Design policy of note is **Policy D9** (Residential infill development), with the supporting text explaining that: "Residential infill development can make efficient use of land and provide new housing stock and attractive places to live. However, it is important that new homes on infill sites relate well to the existing settlement, its surroundings and the character of an area. This policy will ensure that design issues and other detailed matters are taken into account to successfully integrate new residential development into the existing fabric and landscape setting of the local area." Policy criteria on backland development are of particular note, as such scheme can be a significant component of windfall supply. This policy is discussed above, under Biodiversity and Historic environment.

9.12.7   Finally, the <u>Infrastructure and Delivery</u> policies have limited implications for the achievement of housing objectives, albeit recognising that infrastructure costs clearly can lead to implications for development viability. **Policy ID11** (Parking Standards) is of particular note, as developers value flexibility to respond to local circumstances, recognising that requirements for minimum parking standards can lead to sub-optimal development densities (or a need for costly basement parking) and requirements for maximum parking standards can impact negatively on house prices.[32]

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9.12.8   In addition to the housing focused policies, which deal with a range of matters to ensure that the housing stock (both existing and new) meets the full range of housing needs, wide ranging other policies are viewed as positive, from a housing perspective, because they will support an effective development management process, and in turn support housing delivery. Overall **positive effects** are anticipated.

9.13 Land

Minimise the use of best and most versatile agricultural land and encourage the remediation of contaminated land

Commentary on policies

9.13.1   LPDMP does not deal directly with avoiding the loss of best and most versatile agricultural land, although **Policy E11** (Equine-related development) does set out to address an issue whereby horse keeping can lead to "fragmentation of viable agricultural holdings [and] reduced pasture quality".

9.13.2   Other policies of note here are:

- **Policy P10** (Land Affected by Contamination) which aims to establish a policy framework to support the remediation of despoiled, contaminated or unstable land; and

- **Policy P13** (Sustainable Surface Water Management) – the SuDS hierarchy (see Figure 5.1, above) seeks to prioritise discharge to soils ahead of deep infiltrations systems that can impact groundwater.

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9.13.3   The LPDMP will result in broadly **neutral effects**, although Policy E11 (Equine-related development) and Policy P10 (Land Affected by Contamination) are both supported.

9.14 Landscape and townscape

Conserve and enhance the quality and local distinctiveness of landscapes and townscapes

Commentary on policies

9.14.1   Landscape and townscape are both priority issues in the Guildford Borough context, and are a key focus of the LPDMP. An important aim is to supplement adopted LPSS Policy D1 (Place Shaping), which presents criteria on design and place-shaping, requiring all development to *"achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set."*

9.14.2   Beginning with the <u>Housing</u> and <u>Economy</u> policies, the key point to note is the clear focus on "context, scale, design, appearance and character" under **Policy H5** (Housing Extensions, Alterations including Annexes), and "character of the immediate locality" under **Policy H6** (Housing Conversion and Sub-division). Also, **Policy H8** (First Homes) sets criteria for First Homes Exception Sites, setting out that they must be *"small sites… adjacent to existing settlements [and] proportionate in size to them."* Finally, it is noted that **Policy E11** (Equine Related Development) has been updated, since the Regulation 18 stage, to add reference to *"the character of the built environment"*, plus there is a new requirement for proposals to be *"of an acceptable scale, location, design and layout"*.

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[32] KonSULT (KonSULT | Policy Guidebook (leeds.ac.uk) identifies that: *"There is relatively little evidence on the performance of parking standards as a transport policy instrument. This is partly because the effect of changing them – for example, from minimum to maximum standards - is felt over time, as only a small proportion of land is redeveloped each year.' It goes on to review several case studies of the impacts of maximum parking standards. Each of these is interpreted as indicating that maximum parking standards result in the provision of fewer parking spaces which will reduce the cost of development."*

9.14.3   The <u>Protecting</u> policies have wide-ranging links with landscape objectives, for example recognising the links between biodiversity and landscape, and recognising that river corridors (**Policy P12**) will tend to have high landscape value. It is not considered necessary to go into further detail here, beyond highlighting that implications are broadly positive, and no significant tensions are identified.

9.14.4   The <u>Design</u> policies are centrally important to the achievement of landscape and townscape objectives. The following bullet points consider key policies in turn:

- **Policy D4** (Achieving High-Quality Design and Respecting Local Distinctiveness) requires development to demonstrate the ten characteristics of well-designed places as set out by the National Design Guide, reflecting the recent national emphasis on design quality in development. The policy provides direct protection for local landscape/ townscape characteristics, requiring that development proposals "*respond positively to the history of a place, significant views… surrounding context, built and natural features of interest, prevailing character, landscape and topography.*" There is also a notable focus on Accurate Visual Representations (AVRs) as a useful means of assessing the likely impact of development on the townscape/landscape setting (which may include the use of VuCity or a similar tool).

  A key update to the policy is in respect of density, with this matter now dealt with under this Design policy, rather than under a stand-alone policy within the Housing section of the plan. The Policy states: "*Development proposals are expected to make efficient use of land and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting.*" Other updates to the policy include enhanced protection for views as suggested by SCC.

- **Policy D5a** (External Servicing Features and Stores) – is necessary recognising that: "*Modern lifestyles have led to an increasing number of external features that are critical in meeting the daily needs of the users of community, commercial and residential buildings. If not designed properly from an early stage in the design process, they can create a cluttered and unattractive appearance or result in the features being located in inconvenient places which may limit their practical use.*" Key matters dealt with through the policy include cycle parking, electric vehicle charging points and space for the range of bins necessary to ensure alignment with waste management targets.

- **Policy D6** (Shopfront Design) recognises the impact that new or altered shopfronts can have on the appearance, character and vitality of an area and seeks to ensure that shopfronts "*are designed to a high quality*" using sustainable materials and of a design which relates well to "*the proportion, scale, detailing, period and character of the host building as a whole, as well as the wider street scene*".

- **Policy D7** (Advertisements, Hanging Signs and Illumination) similarly sets out criteria aimed at minimising impacts on townscapes, with a particular focus on conservation areas.

- **Policy D8** (Public Realm) provides detailed requirements for new public realm projects and public art. The policy aims to ensure development considers distinctive local qualities, identity, and topography, and delivers high-quality design, views and focal points.

- **Policy D9** (Residential Infill Development Proposals) requires development proposals to integrate well with surrounding development and the environment, and for infill proposals in villages to respect the character and context of the village. The policy has been notably re-ordered and expanded, since the Regulation 18 stage, to include criteria applicable to all types of infill development in all locations, followed by separate criteria on 'Infilling: backland development' and 'Infilling: frontage development'.

- **Policy D11** (Corridor or the River Wey and Guildford and Godalming Navigation) seeks to ensure high quality riverside development in appropriate locations, with a focus on ensuring direct, safe and clear public access to the river, conserving the distinct character of the area, conserving built and natural landscape features, protecting key views and opening up new views.

9.14.5   Finally, the <u>Infrastructure and Delivery</u> policies also have implications for the achievement of landscape and townscape objectives. Of particular note is the protection for the existing network of open spaces, and detailed standards for the provision of new open space, proposed through **Policy ID5** (Protecting Open Space) and **Policy ID6** (Open Space in New Developments). Open spaces and green infrastructure networks contribute to landscape and townscape quality, and more generally, a sense of place.

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9.14.6   The LPDMP includes a wide range of policies aimed at protecting local character and distinctive and ensuring that good masterplanning and design principles are reflected in development proposals. The policy proactively responds to the changing national context, in respect of ensuring good design and beauty in the built environment, hence **significant positive effects** are predicted.

9.15 Poverty

Reduce poverty and social exclusion for all sectors of the community

Commentary on policies

9.15.1   Key policies are those that deal with affordable housing, namely **Policy H7** (Review Mechanisms) and **Policy H8** (First Homes). These policies, which are discussed above, under the Housing topic heading, are both supportive of the achievement of objectives relating to poverty and social exclusion.

9.15.2   Other policies have limited direct or otherwise significant implications. One policy of note is **Policy D12** (Sustainable and Low Impact Development), which seeks to ensure high thermal efficiency with the aim of minimising per capita emissions from the built environment within the Borough, although this approach also reduces the need for heating, and so assists with avoiding issues of fuel poverty, which is a significant issue in the Borough (around 5,100 households are thought to experience fuel poverty). It is important to state, however, that the policy will apply primarily to new build, as opposed to existing homes.

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9.15.3   Whilst the provisions of LPSS predominantly affect this SA objective, the proposed additional measures under Policy D12 encouraging higher levels of energy efficiency in line with the energy hierarchy should support efforts to reduce levels of fuel poverty. Also, policies dealing with affordable housing are supportive of poverty and social exclusion objectives. Minor **positive effects** are anticipated.

9.16 Previously developed land

Make the best use of previously developed land (PDL) and existing buildings

Commentary on draft policies

9.16.1   A primary consideration here is **Policy D4** (Achieving High Quality Design and Respecting Local Distinctiveness) requires efficient use of land, including by increased densities in appropriate circumstances. The supporting text explains: *"Increased densities are likely to be appropriate on a range of sites, in particular on larger sites which are capable of delivering a range of densities across them."* Further consideration might be given to supporting higher densities on previously developed land; however, it is recognised that density must be driven primarily by context rather than whether its PDL. For example, redevelopment of a single storey building in a very rural/sensitive area would not suggest a need for higher density development.

9.16.2   Secondly, **Policy P10** (Land Affected by Contamination) supports remediation of contaminated land, which may reduce such associated risks with development of previously developed land.

9.16.3   Thirdly, **Policy P6/P7** (Biodiversity in New Developments) is of note, in that it sets out: "Biodiversity net gain is not a requirement on previously developed land, unless it supports at least one protected or priority species population or habitat, or an assemblage of species with an otherwise demonstrably high biodiversity value. Where these are present, a measurable net gain for those features is required." This criterion will assist with ensuring the viability of schemes on previously developed land.

9.16.4   Finally, in respect of making best use of existing buildings, this is a matter of increasing focus nationally, as efforts to minimise operational emissions from the built environment begin to take effect, such that an increasing proportion of total emissions from the built environment are non-operational, including the embodied carbon in materials and emissions associated with construction, maintenance, retrofitting and demolition / disposal. **Policy D12** (Sustainable and Low Impact Development) includes a major focus on embodied carbon; however, there is limited focus on making the best use of existing buildings ahead of demolition and rebuild, for example by retrofitting and repurposing. There could be merit to further exploring the matter of 'lifecycle' carbon emissions from the built environment.

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9.16.5   Policy is proposed in respect of development density and the remediation of contaminated land, both of which are important factors with a bearing on making the best use of PDL. It is recommended that there might be an increased focus on making best use of existing buildings, which is increasingly recognised as a decarbonisation priority nationally and internationally. **Neutral effects** are predicted overall.

9.17 Safe and secure communities

Create and maintain safer and more secure communities and improve the quality of where people live and work

Commentary on policies

9.17.1　The LPDMP provides minor additional support for this SA objective, over-and-above adopted LPSS Policy D1 (Place shaping), through policies aimed at improving the quality of the built environment and public realm. Policies of note include:

- **Policy D4** (Achieving High-Quality Design and Respecting Local Distinctiveness) seeks to deliver high-quality design which protects the character and local distinctiveness. The policy expects development to be coherent, accessible, easy to move around, integrated and with public spaces which are safe, social and inclusive.

- **Policy D8** (Public Realm) seeks to "*create attractive, safe and, where appropriate, lively streets*", and encourages "*opportunities for activity and enjoyment…social interaction and community cohesion*".

- **Policy D10** (Noise Impacts) is of note from an environmental health perspective. It seeks to ensure that new development integrates well with existing businesses, community facilities and 'noise-sensitive' uses such as residential uses. Noise Impact Assessments are required in certain circumstances.

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9.17.2　Proposed policy provisions are supportive of improving the quality of local environments and hence should indirectly lead to benefits in respect of in maintaining safer and more secure communities. Overall minor **positive effects** are anticipated.

9.18 Transport

Encourage the use of sustainable forms of transport (walking, cycling, bus, rail)

Commentary on policies

9.18.1　Taking the topic headings within the LPDMP in turn, it is difficult to suggest that new policies under the Housing and Economy headings give rise to significant transport implications. The only policy of note is Policy H5 (Housing Extensions, Alterations including Annexes), recognising that: *"The necessity to work from home in recent years has also led to rethinking and reconfiguring how we use our homes."*

9.18.2　With regards to the Protecting policies, an important consideration is the links made to green and blue infrastructure; for example, Policy P6/P7 (Biodiversity in New Developments) states: *"Biodiversity gains are required to be delivered in a manner that is consistent with the biodiversity policies in this plan and LPSS Policy ID4: Green and Blue Infrastructure so that measures are focused on local priorities and will provide the best biodiversity value."*

9.18.3　With regards to the Design policies, a primary consideration is **Policy D4** (Achieving High Quality Design and Respecting Local Distinctiveness), which encourages, amongst other things, early consideration of layout, specifically *"settlement pattern of roads, paths, spaces and buildings, urban grain, plot sizes, building patterns, rhythms and lines"*.

9.18.4　A further important consideration is the approach to development density set out under Policy D4. The proposal is to support a design-led approach to identifying opportunities for increased densities, as opposed to a prescriptive approach, potentially one whereby higher densities are required in areas with higher levels of accessibility, e.g. locations close to public transport hubs. This matter was explored through appraisal of reasonable alternatives at the Regulation 18 stage (see Section 6 of that report, which is available at: www.guildford.gov.uk/article/25708/Sustainability-Appraisal-reports-Part-2).

9.18.5　Finally, two of the Infrastructure and Delivery policies have clear significant transport implications:

- **Policy ID10** (Achieving a Comprehensive Guildford Borough Cycle Network) gives weight to the comprehensive network as mapped through the Policies Map which identifies specific routes along which improvement measures will be implemented. This includes improvements to the safety and convenience of the routes, the designation of cycle tracks, the designation of cycle lanes, and the signposting and provision of cycle parking facilities. The measures seek to support the uptake of more

sustainable modes of travel and are likely to lead to positive effects accordingly. Following consultation, updates to Policy ID10 specifically seek to further reflect the primary focus on the promotion of utility cycling (for work, school, errands) to aid modal shift, as opposed to leisure journeys.

- **Policy ID11** (Parking Standards) is a focus of detailed discussion in Section 7 of this report. The proposed approach is to require maximum car parking standards in the town centre, suburban areas and strategic sites, and then expected standards in rural and village locations. This is a notable departure from the proposed approach at the Regulation 18 stage, and seeks to reflect a wider range of consultation responses received. Primacy is also afforded to neighbourhood plans in determining appropriate localised parking standards (as discussed above), which is broadly supported, recognising that all Neighbourhood Plans must be examined against nationally established Basic Conditions.

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9.18.6   A number of LPDMP policy provisions are broadly positive in terms of supporting transport objectives, perhaps most notably Policy ID10 (Achieving a Comprehensive Guildford Borough Cycle Network). Development density and parking standards are two policy areas that have been a close focus of the LPDMP-making process to date, and will warrant further scrutiny going forward, including from a perspective of support efforts to minimise the need to travel and reduce car dependency. Overall **positive effects** are anticipated, although there is an element of uncertainty.

9.19 Vibrant communities

Create and sustain vibrant communities

Commentary on policies

9.19.1   There is limited potential to comment beyond the discussions presented above under Education, Health (primarily), Housing and Safe and secure communities. Furthermore, discussion under the environment-focused topic headings is relevant, as environmental quality contributes to vibrant communities.

Appraisal of the Pre-submission LPDMP

9.19.2   The LPDMP is predicted to result in **positive effects**, as per the discussion under other related topic headings above. The very fact that DM policies are being brought forward through a stand-alone plan, as opposed to being brought forward as part of a single Local Plan focused on both spatial strategy / site allocation and DM policies (where the attention invariably tends to focus on the former) serves as evidence that the Council is taking a positive approach to DM policies, specifically one whereby wide-ranging stakeholder groups - including Parish Councils, local community groups and individual residents – have an effective opportunity to input to policy development. The fact that consultation on the Regulation 18 version included significant detail in terms of the scope and content that each preferred policy might include is further evidence of this positive approach. In doing so it ensured that the comments received were as meaningful and detailed as they could be. This increased the possibility of being in a position to be able to progress straight on to a Regulation 19 consultation and adopt the plan with its higher standards in a timely manner.

9.20 Waste

Reduce waste generation and achieve the sustainable management of waste and materials

Commentary on policies

9.20.1   The Surrey Waste Plan (2019) seeks to address the need for waste facilities and identifies appropriate sites for such facilities. The Plan contains development management policies for consideration in planning applications for waste development in Surrey.

9.20.2   LPDMP supports the objectives of the Surrey Waste Plan through the identification of the intrinsic links between development design and waste. Most notably, **Policy D12** (Sustainable and Low Impact Development) requires proposals for major development, and development proposals that involve demolition of buildings or import or excavate hard core, soils, sand and other material to be accompanied by a Site Waste Management Plan.

9.20.3   Also of note is **Policy D5a** (External Servicing Features and Stores), which seeks to "maximise the potential for residents and businesses to recycle as much waste as possible and dispose appropriately of any non-recyclable waste." The supporting text goes on to explain: "Development proposals must provide adequate and conveniently located space for the range of bins required whilst ensuring that they do not detract from the appearance or amenity of the street. The bins must also be located and stored in such a way that they can be collected efficiently. Relevant legislation is set out in Building Regulations 2010: Drainage and Waste Disposal Part H6 Solid waste storage and consultation should take place with the Council's Waste and Recycling Team to determine their requirements."

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9.20.4   The LPDMP supports the objectives of the Surrey Waste Plan through the provisions of Policy D12 ensuring that major development fully considers its impact in relation to waste generation and waste management, as well as Policy D5a (External Servicing Features and Stores), which seeks to support household and business recycling rates. As a result, minor **positive effects** are anticipated overall.

9.21 Water quality

Maintain and improve the water quality of the borough's rivers and groundwater

Commentary on policies

9.21.1   **Policy P12** (Water Quality, Waterbodies and Riparian Corridors) requires that development proposals that contain or are in the vicinity of a waterbody demonstrate that they have explored opportunities to improve its chemical and ecological status. Furthermore, the policy restricts development that would result in a deterioration to water quality. Development affecting watercourses is required to explore opportunities to improve and/ or restore the flow and functioning of a watercourse and implement appropriate buffers along riverbanks, as well as identify opportunities for Natural Flood Management and wetland features.

9.21.2   A second key policy is **Policy P13** (Sustainable Surface Water Management), which sets out drainage considerations for all development and additional provisions for major developments and development in areas at risk of flooding. Under Policy P13, all development should incorporate drainage schemes which "*intercept as much rainwater and runoff as possible, including runoff from outside the site*". All proposals are also required to maximise the use of permeable surfaces. Good surface water management is an important factor affecting both for river water and groundwater quality.

9.21.3   **Policy D11** (The Corridor of The River Wey & Godalming Navigations) is also noteworthy, recognising that the River Wey is the main waterbody within the Plan area, and much of the river currently achieves 'moderate' status, with some tributaries currently achieving only 'poor' or 'bad' (the River Wey directly upstream from the Borough is largely 'poor' quality status).[33] There is not an explicit focus on water quality, although this is potentially appropriate, in light of the requirements set out under Policy P12 (the supporting text of which includes a clear focus on the Corridor of The River Wey & Godalming Navigations).

9.21.4   Finally, it is noted that **Policy H5** (Housing Extensions and Alterations including Annexes) includes a criterion requiring "*no unacceptable impact on local ground water conditions, flooding or drainage…*"

9.21.5   The LPDMP policies have been updated following Regulation 18 consultation, particularly reflecting comments received from the Environment Agency which have sought to implement stronger measures to improve water quality and Water Framework Directive (WFD) status, discourage the use of boreholes, protect and enhance ecological connectivity along riverbank habitats, remove barriers to fish movement, and reduce risk of pollution to groundwater.

Appraisal of the Pre-submission LPDMP

9.21.6   LPDMP has been developed to closely reflect the Regulation 18 consultation response received from the Environment Agency, with a particular focus on ensuring a robust approach to managing the water environment through Policy P12 (Water Quality, Waterbodies and Riparian Corridors) and Policy P13 (Sustainable Surface Water Management). As a result, minor **positive effects** are anticipated overall.

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[33] The draft River Wey Catchment Plan identifies high levels of phosphate (both from wastewater treatment and other sources) and fish populations as the predominant issues. The Wey Fishpass and Wetland Delivery Project (WeyFWD) has been developed to address some of these issues and support movement of the River towards 'good' ecological status.

9.22 Water resources

Achieve sustainable water resources management and water conservation

Commentary on policies

9.22.1   Beginning with **Policy D12** (Sustainable and Low Impact Development), the key point to note is the proposal to supplement the LPPS Policy D2 building water efficiency standard with the following requirement: *"New developments are expected to incorporate measures to harvest rainwater and conserve water resources and, where possible, water recycling/reuse systems."* This focus within Policy D12 is an evolution on the policy approach presented at the Regulation 18 stage, which seeks to reflect the consultation response received from the Environment Agency.

9.22.2   Thames Water further recommend that planning policy identifies appropriate measures to ensure that infrastructure is available to serve all new development, recognising the long lead-in times associated with certain infrastructure works (e.g. 3-5 years for Water Treatment Works upgrades). However, this is judged to be a matter for the adopted LPSS. In particular, Policy ID1(1) and (2) require that the infrastructure necessary to support new development will be provided and available when first needed to serve the development's occupants and users and/or to mitigate its otherwise adverse material impacts. To achieve this, the delivery of development may need to be phased to reflect the delivery of infrastructure.

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9.22.3   Implications of the LPDMP are limited, although Policy D12 (Sustainable and Low Impact Development) does helpfully supplement adopted LPSS Policy D2, which aims to ensure that buildings are designed and constructed so as to achieve high standards of water efficiency. Minor **positive effects** are predicted.

9.23 Overall conclusions on the LPDMP

9.23.1   The appraisal predicts wide-ranging positive effects, although under some SA topic headings positive effects are likely to be 'minor', and under three headings (Digital infrastructure, Land and Previously developed land) the conclusion is that effects will be broadly 'neutral'. The appraisal predicts stand-out 'significant' positive effects in terms of: Biodiversity; Health and Landscape / townscape. These effects are predicted mindful that the LPDMP will be implemented alongside the adopted LPSS.

9.23.2   A prediction of broadly positive effects is unsurprising, given the nature of the plan document, namely one focused on policies to manage the growth that is already committed. The appraisal identifies few significant or otherwise notable tensions between the LPDMP policies and sustainability objectives.

9.23.3   However, a number of recommendations and suggestions are made. These should be taken into account as part of plan-finalisation, although it is recognised that recommendations are made 'in a silo' (i.e. recommendations under any given topic heading are made without any consideration given to knock on implications for the achievement of objectives under other topic headings), whilst plan-makers must ensure that all policies align with all plan objectives 'in the round', as far as possible.

Part 3: What are the next steps?

10 Plan finalisation

10.1.1   This SA Report is published for consultation alongside the proposed submission (or 'pre-submission') version of the LPDMP, under Regulation 19 of the Local Planning Regulations.

10.1.2   Following the consultation, the main issues raised will be identified and summarised, and a decision made regarding whether the plan is 'sound'. Assuming that the LPDMP is considered to be sound, it will then be submitted to Government, alongside the summary of main issues raised through consultation and other supporting documentation, including this SA Report.

10.1.3   An examination in public will then be held, overseen by one or more appointed Planning Inspectors. The Inspector(s) will consider whether the plan is legally compliant and sound, in light of the available evidence, including representations received at the Regulations 19 stage, this SA Report and (in all likelihood) evidence gathered through hearings.

10.1.4   The Inspector(s) will then either report back on the Plan's soundness or identify the need for modifications. If there is a need for modifications these will be prepared and then subjected to consultation, alongside SA if necessary.

10.1.5   Once found to be 'sound' the LPDMP will be adopted by the Council. At the time of adoption a 'Statement' must published that explains the 'story' of plan-making / SA process and sets out 'the measures decided concerning monitoring'.

11 Monitoring

11.1.1   The SA Report must present 'measures envisaged concerning monitoring', albeit mindful that decisions on monitoring must be taken by Guildford Borough Council.

11.1.2   In light of the appraisal presented in Section 9, monitoring efforts could potentially focus on:

- Affordable housing;
- Biodiversity net gain;
- Built environment greenhouse gas emissions; and
- Residential car parking.