

# Guildford Local Plan Habitats Regulations Assessment

Local Plan Part 2: Development Management Policies  
Regulation 19 Consultation Document

Guildford Borough Council

Project number: 60616479

August 2021

## Quality information

Prepared by	Checked by	Verified by	Approved by
Amelia Kent Senior Ecologist (ACIEEM)	James Riley CEnv MICEEM Technical Director	Max Wade CEnv MCIEEM Technical Director	James Riley CEnv MICEEM Technical Director

## Revision History

Revision	Revision date	Details	Authorized	Name	Position
0	13/03/20	Draft	JR	James Riley	Technical Director (HRA)
1	17/03/20	For issue	JR	James Riley	Technical Director (HRA)
2	18/08/21	For issue	JR	James Riley	Technical Director (HRA)
3	20/09/21	For issue	JR	James Riley	Technical Director (HRA)

## Distribution List

# Hard Copies	PDF Required	Association / Company Name

Prepared for:

Guildford Borough Council

Prepared by:

Amelia Kent  
Senior Ecologist (ACIEEM)

AECOM Limited  
Midpoint, Alencon Link  
Basingstoke  
Hampshire RG21 7PP  
United Kingdom

[aecom.com](http://aecom.com)

© 2021 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

## Table of Contents

1. Introduction.....	5
Scope of the Project.....	5
Legislation.....	5
Report Layout.....	6
2. Methodology.....	7
Introduction.....	7
A Proportionate Assessment.....	7
The Process of HRA.....	8
The Scope.....	10
The ‘in combination’ Scope.....	10
3. Pathways of Impact.....	12
Urbanisation.....	12
Recreational Pressure.....	13
Atmospheric Pollution.....	14
Water Quality and Resources.....	16
4. Test of Likely Significant Effects.....	19
5. In-combination Assessment.....	48
6. Conclusions.....	48
Appendix A Habitats Site Background.....	50

## Figures

Figure 1: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT).....	16
Figure 2: Areas of water stress within England. It can be seen from this map that Surrey is classified as being an area of serious water stress (coded red).....	17

## Tables

Table 1: Main sources and effects of air pollutants on habitats and species.....	14
Table 2. Likely Significant Effects of the Policies within the Guildford Local Plan Development Management Policies for Effects on Thames Basin Heaths SPA.....	20

# 1. Introduction

## Scope of the Project

- 1.1 Following adoption of Guildford Local Plan Part 1 in 2019, AECOM was appointed to undertake the HRA of the Guildford Local Plan Part 2: Development Management Policies (LPDMP). The objectives of this assessment are to:
  - Identify any aspects of the LPDMP document that would have the potential to cause a likely significant effect on, or adverse effect on the integrity of, Habitats sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites), either in isolation or in combination with other plans and projects, and;
  - Advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.
- 1.2 The HRA of the Guildford LPDMP is required to determine if there are any realistic linking pathways present between a Habitats site and the LPDMP and where Likely Significant Effects cannot be screened out, an analysis to inform Appropriate Assessment to be undertaken to determine if adverse effects on the integrity of the Habitats sites will occur as a result of the Local Plan alone or in combination with other plans and projects.

## Legislation

- 1.1 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (**Box 1**). The ultimate aim of the Habitats Regulations is to “*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*”. This aim relates to habitats and species, not the Habitats sites themselves, although the sites have a significant role in delivering favourable conservation status. Habitats sites can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Habitats sites.

### Box 1: The legislative basis for Appropriate Assessment

#### **Conservation of Habitats and Species Regulations 2017 (as amended)**

The Regulations state that:

*“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... must make an appropriate assessment of the implications for the plan or project in view of that site’s conservation objectives... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.”*

- 1.2 The Habitats Regulations applies the precautionary principle to Habitats sites (SAC and SPA). As a matter of UK Government policy, Ramsar sites are given equivalent status. For the purposes of this assessment candidate SACs (cSACs), proposed SPAs (pSPAs) and proposed Ramsar (pRamsar) sites are all treated as fully designated sites. In this report we use the term “Habitats sites” to refer collectively to the sites listed in this paragraph.
- 1.3 Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

- 1.4 In 2018, the ‘People Over Wind’ European Court of Justice (ECJ) ruling<sup>1</sup> determined that ‘mitigation’ (i.e. measures that are specifically introduced to avoid or reduce the harmful effects of a plan or project on Habitats sites) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the appropriate assessment stage. Appropriate assessment is not a technical term: it simply means ‘an assessment that is appropriate’ for the plan or project in question. As such, the law purposely does not prescribe what it should consist of or how it should be presented; these are decisions to be made on a case by case basis by the competent authority. The UK is no longer part of the European Union. However, for the purposes of this assessment it is assumed as a precaution that the UK courts may continue to consider existing ECJ rulings on HRA matters as useful jurisprudence even after this date.
- 1.5 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

## Report Layout

- 1.6 **Chapter 2** of this report explains the process by which the HRA has been carried out. **Chapter 3** explores the relevant pathways of impact. **Chapter 4** presents the Test of Likely Significant Effects of the policies and site allocations of the Plan considered ‘alone’ and ‘in-combination’. **Chapter 5** presents the conclusions.

---

<sup>1</sup> Case C-323/17

## 2. Methodology

### Introduction

- 2.1 This section sets out the approach and methodology for undertaking the Habitats Regulations Assessment (HRA). HRA itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument. Therefore, there is no direct relationship to the National Planning Policy Framework (NPPF) and the ‘Tests of Soundness’.

### A Proportionate Assessment

- 2.2 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.
- 2.3 However, the draft DLUHC guidance<sup>2</sup> (described in greater detail later in this chapter) makes it clear that when implementing HRA of land-use plans, the Appropriate Assessment (AA) should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:
- 2.4 *“The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project.”*
- 2.5 More recently, the Court of Appeal<sup>3</sup> ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be “*achieved in practice*” then this would suffice to meet the requirements of the Habitat Regulations. This ruling has since been applied to a planning permission (rather than a Plan document)<sup>4</sup>. In this case the High Court ruled that for “*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations*”.
- 2.6 In other words, there is a tacit acceptance that AA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers as illustrated in **Box 2**.

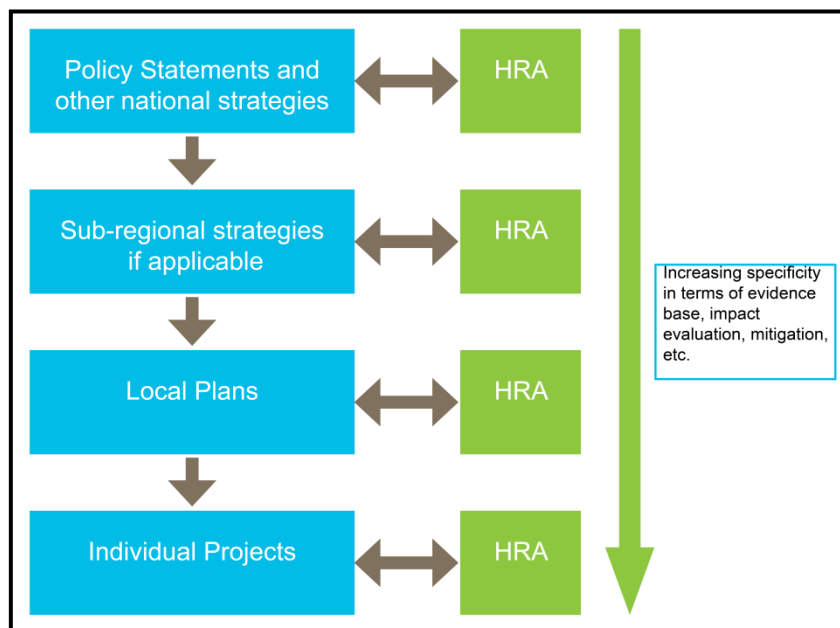
---

<sup>2</sup> DLUHC (2006) Planning for the Protection of Habitats sites, Consultation Paper

<sup>3</sup> No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17<sup>th</sup> February 2015

<sup>4</sup> High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

## Box 2: Tiering in HRA of Land Use Plans



- 2.7 The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt (within the limits of reasonableness); it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon an internationally designated site unless it can be clearly established otherwise.

## The Process of HRA

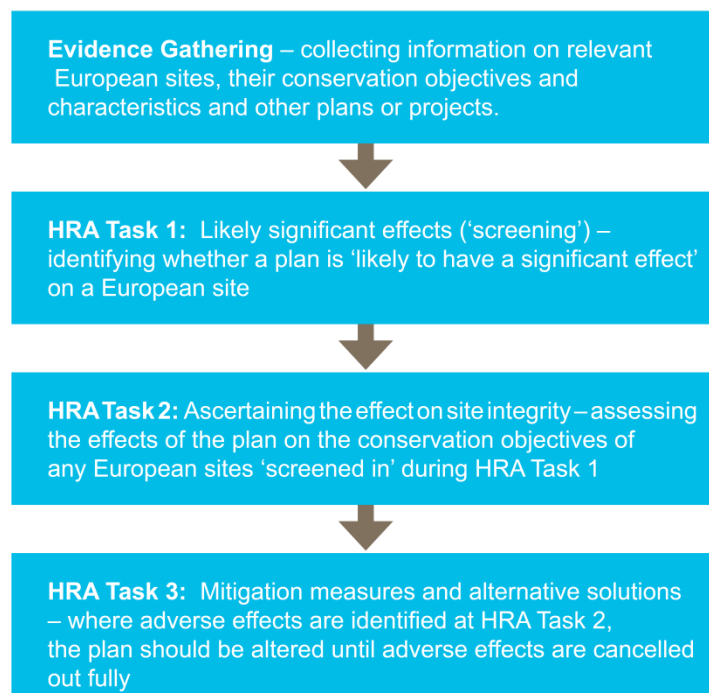
- 2.8 The HRA is being carried out in the continuing absence of formal central Government guidance on HRA of plans specifically. The former DCLG (now DLUHC) released a consultation paper on AA of Plans in 2006<sup>5</sup>. As yet, no further formal guidance has emerged from DLUHC on the assessment of plans. However, central government has released general guidance on appropriate assessment<sup>6</sup>
- 2.9 **Box 3** outlines the stages of HRA according to the draft DLUHC guidance (which, as government guidance applicable to English authorities is considered to take precedence over other sources of guidance). The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations, and any relevant changes to the plan until no likely significant effects remain.

<sup>5</sup> DLUHC (2006) Planning for the Protection of Habitats sites, Consultation Paper

<sup>6</sup> <https://www.gov.uk/guidance/appropriate-assessment>



### Box 3: Four-Stage Approach to Habitats Regulations Assessment



2.10 The following process has been adopted for carrying out the subsequent stages of the HRA.

### Task One: Test of Likely Significant Effect

2.11 The first stage of any Habitats Regulations Assessment is a test of Likely Significant Effect - essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

2.12 *“Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?”*

2.13 In evaluating significance, AECOM have relied on professional judgment and experience of working with the other local authorities on similar issues. The level of detail concerning developments that will be permitted under land use plans is rarely sufficient to make a detailed quantification of effects. Therefore, a precautionary approach has been taken (in the absence of more precise data) assuming as the default position that if a likely significant effect (LSE) cannot be confidently ruled out, then the assessment must be taken the next level of assessment Task Two: Appropriate Assessment. This is in line with the April 2018 court ruling relating to 'People Over Wind' where mitigation and avoidance measures are to be included at the next stage of assessment.

### Task Two: Appropriate Assessment

2.14 Habitats sites which have been 'screened in' during the previous Task have a detailed assessment undertaken on the effect of the policies on the Habitats site integrity. Avoidance and mitigation measures to avoid adverse significant effects are taken into account or recommended where necessary.

2.15 As established by case law, 'appropriate assessment' is not a technical term; it simply means whatever further assessment is necessary to confirm whether there would be adverse effects on the integrity of any Habitats sites that have not been dismissed at screening. Since it is not a technical term it has no firmly established methodology except that it essentially involves repeating the analysis for the likely significant effects stage, but to a greater level of detail on a

smaller number of policies and sites, this time with a view to determining if there would be adverse effects on integrity.

- 2.16 One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment takes any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the Habitats site).

## The Scope

- 2.17 There is no pre-defined guidance that dictates the physical scope of a HRA of a Local Plan. Therefore, in considering the physical scope of the assessment we were guided primarily by the identified impact pathways rather than by arbitrary 'zones'. Current guidance suggests that the following Habitats sites be included in the scope of assessment:

- All sites within the Guildford Borough boundary; and
- Other sites shown to be linked to development within the Borough boundary through a known 'impact pathway' (discussed below).

- 2.18 Briefly defined, impact pathways are routes by which a change in activity within the Local Plan area can lead to an effect upon a Habitats site. In terms of the second category of Habitats site listed above, DLUHC guidance states that the AA should be '*proportionate to the geographical scope of the [plan policy]*' and that '*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*' (CLG, 2006, p.6).

- 2.19 There are two Habitats sites which fall partially within Guildford Borough - the Thames Basin Heaths (TBH) Special Protected Area (SPA) and Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) (which overlaps with the SPA).

## The 'in combination' Scope

- 2.20 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the Habitats site(s) in question.

- 2.21 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee<sup>7</sup> case.

- 2.22 For the purposes of this HRA, we have determined that the key other documents with a potential for in-combination effects are:

- Guildford Local Plan Part 1: Strategy and Sites (2015 – 2034) (Adopted April 2019)
- Waverley Local Plan Part 1: Strategic Policies and Sites (Adopted February 2018)
- Emerging Waverley Local Plan Part 2: Site Allocations and Development Management Policies (Preferred Options Stage)
- Emerging Surrey Heath Local Plan 2016 to 2032 (Consultation 2020)
- Emerging Woking Local Development Documents 2027

---

<sup>7</sup> Waddenzee case (Case C-127/02, [2004] ECR-I 7405)

- Emerging Elmbridge Local Development Scheme 2019 – 2022 (Options Consultation)
- Emerging Mole Valley Local Plan (2018 – 2033) (Public Consultation)
- Rushmoor Local Plan to 2032 (Adopted February 2019)
- Guildford Thames Basin Heaths SPA Supplementary Planning Document (Adopted July 2017)
- Thames Water Final Water Resources Management Plan 2019 (2020)

## 3. Pathways of Impact

3.1 The following pathways of impact are considered relevant to the HRA of LPDMP as they were to LPP1:

- Urbanisation
- Recreational Pressure
- Atmospheric Pollution
- Water Quality and Resources

### Urbanisation

3.2 This impact is closely related to recreational pressure, in that they both result from increased populations within close proximity to sensitive sites. Urbanisation is considered separately as the detail of the impacts is distinct from the trampling, disturbance and dog-fouling that results specifically from recreational activity. The list of urbanisation impacts can be extensive, but core impacts can be singled out:

- *Increased fly-tipping* - Rubbish tipping is unsightly but the principle adverse ecological effect of tipping is the introduction of invasive alien species with garden waste. Garden waste results in the introduction of invasive aliens precisely because it is the 'troublesome and over-exuberant' garden plants that are typically thrown out<sup>8</sup>. Alien species may also be introduced deliberately or may be bird-sown from local gardens.
- *Cat predation* - A survey performed in 1997 indicated that nine million British cats brought home 92 million prey items over a five-month period<sup>9</sup>. A large proportion of domestic cats are found in urban situations, and increasing urbanisation is likely to lead to increased cat predation.

3.3 The most detailed consideration of the link between relative proximity of development to Habitats sites and damage to interest features has been carried out with regard to the Thames Basin Heaths SPA.

3.4 After extensive research, Natural England and its partners produced a 'Delivery Plan' which made recommendations for accommodating development while also protecting the interest features of the Habitats site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development. While the zones relating to recreational pressure expanded to 5km (as this was determined from visitor surveys to be the principal recreational catchment for this Habitats site), that concerning other aspects of urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats, but also including recreational pressure, fly tipping, increased incidence of fires and general urbanisation) was determined at 400m from the SPA boundary. The delivery plan concluded that the adverse effects of any residential development located within 400m of the SPA boundary could not be mitigated, in part because this was the range within cats could be expected to roam as a matter of routine and there was no realistic way of restricting their movements, and as such, no new housing should be located within this zone.

3.5 Guildford Council is a participatory organisation within the Thames Basin Heaths SPA Delivery Plan, including the prohibition on net new housing within 400m of the SPA.

---

<sup>8</sup> Gilbert, O. & Bevan, D. 1997. The effect of urbanisation on ancient woodlands. *British Wildlife* 8: 213-218.

<sup>9</sup> Woods, M. et al. 2003. Predation of wildlife by domestic cats *Felis catus* in Great Britain. *Mammal Review* 33, 2 174-188

## Recreational Pressure

- 3.6 Extensive research in the Thames Basin Heaths area (reported in a series of surveys, the most recent being in 2018<sup>10</sup>) identified damaging levels of recreational pressure in the absence of mitigation. Recreational use of a site has the potential to:
- Cause disturbance to sensitive species, particularly ground-nesting birds such as woodlark and nightjar, and wintering wildfowl;
  - Prevent appropriate management or exacerbate existing management difficulties;
  - Cause damage to SAC habitats through erosion; and
  - Cause eutrophication as a result of dog fouling.
- 3.7 Different types of Habitats sites (e.g. heathland, chalk grassland) are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.
- 3.8 The effects of recreation on heathland sites have been described in a series of English Nature (now Natural England) Research Reports.<sup>11</sup> Recreational pressure can have a significant adverse effect on the Annex 1 bird species for which the SPAs in this area are designated. Disturbance can have an adverse effect in various ways, with increased nest predation by natural predators as a result of adults being flushed from the nest and deterred from returning to it by the presence of people and dogs likely to be a particular problem. A literature review on the effects of human disturbance on bird breeding found that 36 out of 40 studies reported reduced breeding success as a consequence of disturbance<sup>12</sup>. The main reasons given for the reduction in breeding success were nest abandonment and increased predation of eggs or young. Over years, studies of other species have shown that birds nest at lower densities in disturbed areas, particularly when there is weekday as well as weekend pressure<sup>13</sup>.
- 3.9 A number of studies have shown that birds are affected more by dogs and people with dogs than by people alone, with birds flushing more readily, more frequently, at greater distances and for longer (Underhill-Day, 2005). In addition, dogs, rather than people, tend to be the cause of many management difficulties, notably by worrying grazing animals, and can cause eutrophication near paths. Nutrient-poor habitats such as heathland are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces<sup>14</sup>.
- 3.10 Underhill-Day (2005) summarises the results of visitor studies that have collected data on the use of semi-natural habitat by dogs. In surveys where 100 observations or more were reported, the mean percentage of visitors who were accompanied by dogs was 54.0%.
- 3.11 However, these studies need to be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may

<sup>10</sup> <https://surreyheath.moderngov.co.uk/documents/g3273/Public%20reports%20pack%2019th-Sep-2019%2010.00%20Thames%20Basin%20Heaths%20Joint%20Strategic%20Partnership%20Board.pdf?T=10>

<sup>11</sup> Liley, D. and R.T. Clarke (2002) – Urban development adjacent to heathland sites in Dorset: the effect on the density and settlement patterns of Annex 1 bird species. *English Nature Research Reports*, No. 463.

Murison, G. (2002) – The impact of human disturbance on the breeding success of nightjar *Caprimulgus europaeus* on heathlands in south Dorset, England. *English Nature Research Reports*, No. 483.

Land Use Consultants (2005) – Going, going, gone? The cumulative impact of land development on biodiversity in England. *English Nature Research Reports*, No. 626.

Rose, R.J. and R.T. Clarke (2005) – Urban impacts on Dorset Heathlands: Analysis of the heathland visitor questionnaire survey and heathland fires incidence data sets. *English Nature Research Reports*, No. 624.

Tyldesley, D. and associates (2005) – Urban impacts on Dorset heaths: A review of authoritative planning and related decisions. *English Nature Research Reports*, No. 622.

Underhill-Day, J.C. (2005) – A literature review of urban effects on lowland heaths and their wildlife. *English Nature Research Reports*, No. 623.

<sup>12</sup> Hockin, D., M. Oundsted, M. Gorman, D. Hill, V. Keller and M.A. Barker (1992) – Examination of the effects of disturbance on birds with reference to its importance in ecological assessments. *Journal of Environmental Management*, **36**, 253-286.

<sup>13</sup> Van der Zande, A.N., J.C. Berkhuisen, H.C. van Letesteyn, W.J. ter Keurs and A.J. Poppelaars (1984) – Impact of outdoor recreation on the density of a number of breeding bird species in woods adjacent to urban residential areas. *Biological Conservation*, **30**, 1-39.

<sup>14</sup> Shaw, P.J.A., K. Lankey and S.A. Hollingham (1995) – Impacts of trampling and dog fouling on vegetation and soil conditions on Headley Heath. *The London Naturalist*, **74**, 77-82.

remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their population<sup>15</sup>. A recent literature review undertaken for the RSPB<sup>16</sup> also urges caution when extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to local environmental conditions. These facts have to be taken into account when attempting to predict the impacts of future recreational pressure on Habitats sites.

- 3.12 Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered.

## Thames Basin Heaths SPA/ Thursley, Ash, Pirbright & Chobham SAC

- 3.13 In 2005, a visitor assessment of the Thames Basin Heaths SPA<sup>17</sup> determined that the majority of visitors travel by car and drive relatively short distances (less than 5km). This helped determine that any new residential development within 5km of the SPA could result in likely significant effects upon the SPA. To ensure development within Guildford did not result in likely significant effects upon the Thames Basin Heaths SPA, the Council produced a Thames Basin Heaths SPA avoidance strategy which forms the basis of planning guidance in relation to new residential development and its impact upon the SPA. Several subsequent surveys (the most recent in 2018) have reaffirmed this zone as well as the effectiveness of the Thames Basin Heaths mitigation solution. The current iteration of the Council's avoidance strategy is the Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 SPD (adopted in July 2017).

## Atmospheric Pollution

- 3.14 The main pollutants of concern for Habitats sites are oxides of nitrogen (NO<sub>x</sub>), ammonia (NH<sub>3</sub>) and sulphur dioxide (SO<sub>2</sub>). NO<sub>x</sub> can have a directly toxic effect upon vegetation. In addition, greater NO<sub>x</sub> or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

**Table 1: Main sources and effects of air pollutants on habitats and species**

Pollutant	Source	Effects on habitats and species
Acid deposition	SO <sub>2</sub> , NO <sub>x</sub> and ammonia all contribute to acid deposition. Future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline. In the long-term NO <sub>x</sub> and ammonia from traffic can also be expected to reduce in the light of a ban on the sale of new petrol and diesel cars and vans from 2030.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH <sub>3</sub> )	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. It is also emitted by some vehicles (petrol cars). Ammonia reacts with acid pollutants such as the products of SO <sub>2</sub> and NO <sub>x</sub>	Adverse effects are as a result of nitrogen deposition leading to eutrophication and from direct toxicity. As emissions mostly occur at ground level in the rural environment and NH <sub>3</sub> is rapidly deposited, some of the most acute problems of NH <sub>3</sub> deposition are for

<sup>15</sup> Gill et al. (2001) - Why behavioural responses may not reflect the population consequences of human disturbance. *Biological Conservation*, **97**, 265-268

<sup>16</sup> Woodfield & Langston (2004) - Literature review on the impact on bird population of disturbance due to human access on foot. *RSPB research report* No. 9.

<sup>17</sup> Liley, D, Jackson, D. & Underhill-Day, J. (2005). Visitor Access Patterns on the Thames Basin Heaths. English Nature Research Report 682. English Nature, Peterborough

	emissions to produce fine ammonium (NH <sub>4</sub> <sup>+</sup> ) containing aerosol which may be transferred much longer distances (can therefore be a significant trans-boundary issue.). In the long-term ammonia from traffic can also be expected to reduce in the light of a ban on the sale of new petrol and diesel cars and vans from 2030.	small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides NO <sub>x</sub>	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations. Traffic also makes a notable contribution. NO <sub>x</sub> emissions from traffic have been reducing for years thanks to improvements in emissions technology. In the long-term NO <sub>x</sub> can be expected to reduce further in the light of a ban on the sale of new petrol and diesel cars and vans from 2030.	Deposition of nitrogen compounds (nitrates (NO <sub>3</sub> ), nitrogen dioxide (NO <sub>2</sub> ) and nitric acid (HNO <sub>3</sub> )) can lead to both soil and freshwater acidification. In addition, NO <sub>x</sub> can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.
Nitrogen (N) deposition	The pollutants that contribute to nitrogen deposition derive from NO <sub>x</sub> and NH <sub>3</sub> emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication. In the long-term nitrogen deposition associated with traffic can be expected to reduce in the light of a ban on the sale of new petrol and diesel cars and vans from 2030.	Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O <sub>3</sub> )	A secondary pollutant generated by photochemical reactions from NO <sub>x</sub> and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O <sub>3</sub> above 40 ppb can be toxic to humans and wildlife and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.
Sulphur Dioxide SO <sub>2</sub>	Main sources of SO <sub>2</sub> emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO <sub>2</sub> emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO <sub>2</sub> acidifies soils and freshwater and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.

3.15 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. As such, it is unlikely that material increases in SO<sub>2</sub> emissions will be associated with Local Plans. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions as (at a very local level) do vehicle exhaust emissions. NO<sub>x</sub> emissions are dominated by the output of vehicle exhausts. Within a 'typical' housing development, by far the largest contribution to NO<sub>x</sub>

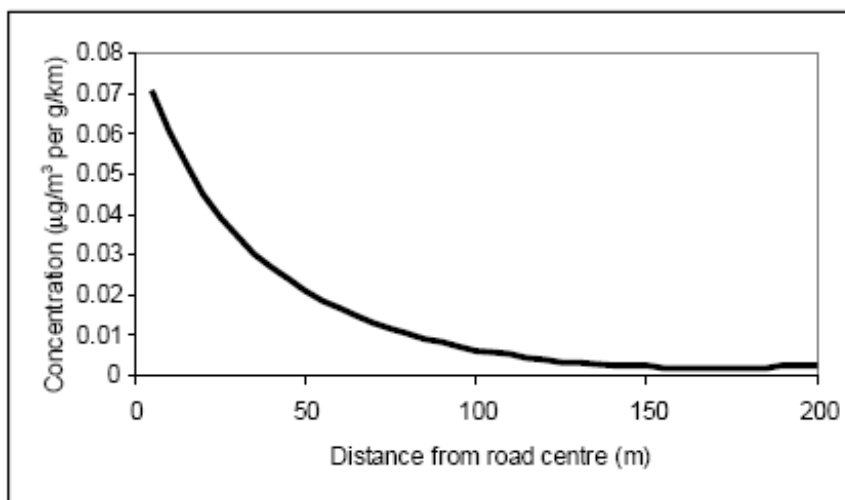
(92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison<sup>18</sup>.

3.16 According to the World Health Organisation, the critical NO<sub>x</sub> concentration (critical level) for the protection of vegetation is 30 µgm<sup>-3</sup>; the threshold for sulphur dioxide is 20 µgm<sup>-3</sup>, while the critical level for ammonia ranges from 1-3 µgm<sup>-3</sup> depending on whether higher or lower plants are the key interest feature. In addition, ecological studies have determined 'Critical Loads'<sup>19</sup> of atmospheric nitrogen deposition (that is, NO<sub>x</sub> combined with ammonia NH<sub>3</sub>) for key habitats within Habitats sites.

## Local Air Pollution

3.17 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant.

**Figure 1: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)**



## Water Quality and Resources

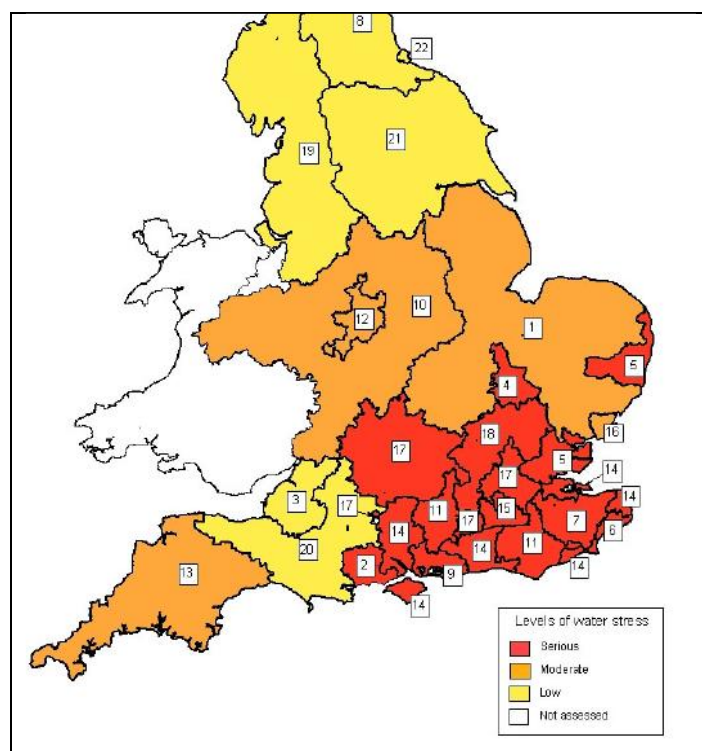
### Water Abstraction

3.18 The South East is generally an area of high water-stress (see **Figure 2**).

<sup>18</sup> Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

<sup>19</sup> The Critical Load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur





**Figure 2: Areas of water stress within England. It can be seen from this map that Surrey is classified as being an area of serious water stress (coded red).**

3.19 Development within Guildford Borough over the plan period will increase water demand.

3.20 According to the Wey Catchment Abstraction Management Strategy Guildford Borough lies within several Water Resource Management Units:

- Cranleigh Waters;
- Tillingbourne;
- Guildford
- Hoe Stream; and
- Weybridge

3.21 Guildford borough lies within Thames Water’s Guildford Water Resource Zone. According to the final Water Resource Management Plan (2020) this water resource zone is calculated to be in surplus over the entire plan period under normal conditions but may have deficits under peak demand. Thames Water intends to extend their water efficiency, leakage reduction and metering programmes into the zone in order to conserve resources. Affinity Water have also identified the need to employ measures to ensure sustainable supply in their ‘Wey’ Water Resource Zone, as have South East Water in their WRZ4 and WRZ5, which extend east of Aldershot. The determination of surplus or deficit does take account of environmental limits and the implication is that there should be no requirement for damaging levels of abstraction from any of the aquifers connected to these Habitats sites.

## Water Quality

3.22 Development within Guildford Borough over the plan period will increase wastewater production. Wastewater from the District is treated by Thames Water and discharges to the River Wey or River Blackwater, which ultimately drains to the River Thames. Neither of these rivers are Habitats sites.

3.23 Research carried out by the Environment Agency has indicated that future sewage treatment capacity at Guildford sewage treatment works can be rendered adequate to deal with projected growth, at least to 2026 given relatively small capital cost<sup>20</sup> and will therefore not have an adverse

<sup>20</sup> Environment Agency. May 2006. Creating a Better Place: Planning for Water Quality and Growth in the South East.

effect upon receiving waters. Additionally, Guildford Council commissioned a bespoke Water Quality Assessment to support the development of the Local Plan<sup>21</sup>. Stage 2 of the assessment (October 2017) concluded that feasible solutions were possible to ensure environmental conditions and legislative objectives are met relating to water quality.

---

<sup>21</sup> Water Quality Assessment <https://www.guildford.gov.uk/newlocalplan/infrastructureanddelivery>

## 4. Test of Likely Significant Effects

- 4.1 The Guildford Local Plan Part 2: Development Management Policies Document has been subjected to HRA screening for likely significant effects both alone and in combination. Each issue and policy has been considered. The purpose of the likely significant effects screening is to determine whether any of the policies could result in a likely significant effect on any Habitats site in view of those sites conservation objectives either alone or in combination with other plans and projects. Since Local Plan Part 2 is essentially a development management document it does not allocate, or determine a quantum of, growth in the manner of Local Plan Part 1 but sets the policies by which development will be managed. Policies in Local Plan Part 2 must be read in the context of development management policies at a strategic level in Local Plan Part 1.

**Table 2. Likely Significant Effects of the Policies within the Guildford Local Plan Development Management Policies for Effects on Thames Basin Heaths SPA**

Policy Number	Policy Description	Likely Significant Effects Screening Decision
Policy H5: Housing extensions and alterations including annexes	<p>1. Development proposals for residential extensions and alterations are required to have regard to the impact on the street scene, neighbouring properties and the existing property such that they:</p> <ul style="list-style-type: none"> <li>a) respect the existing context, scale, design, appearance and character of the adjacent buildings and immediate surrounding area;</li> <li>b) have no unacceptable impact on the amenities enjoyed by the occupants of adjacent buildings in terms of privacy and access to sunlight and daylight; and</li> <li>c) take into account the form, scale, height, character, materials and proportions of the existing building.</li> </ul> <p><b>Basement extensions</b></p> <p>2. Development proposals for basement extensions are required to:</p> <ul style="list-style-type: none"> <li>a) be proportionate and ensure that their potential impact on the local environment, trees, tree roots, garden area, architectural character of the property, neighbouring properties and residential amenity is acceptable;</li> <li>b) have clear internal access to upper floors;</li> <li>c) have no unacceptable impact on local ground water conditions, flooding or drainage issues; and</li> <li>d) include a structural impact report from a certified structural engineer. The report should show that there is no unacceptable impact to land and the structural stability of the application site and adjacent properties during construction and once built.</li> </ul> <p><b>Annexes</b></p> <p>3. Development proposals for a residential annex are required to demonstrate that:</p> <ul style="list-style-type: none"> <li>a) it is an extension that would be subordinate in scale to the main residence;</li> <li>b) it is functionally integrated with the main dwelling;</li> <li>c) it clearly and unequivocally shares either bathroom or kitchen facilities with the main dwelling; and</li> <li>d) it would share the vehicular access and garden area.</li> </ul>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy setting out the criteria by which extensions will be deemed acceptable. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>
Policy H6: Housing conversion and sub-division	<p>1. Development proposals involving the conversion and/or sub-division of buildings into houses, flats, studios or bedsits are required to ensure that:</p> <ul style="list-style-type: none"> <li>a) there would not be an unacceptable impact on the character of the immediate locality;</li> <li>b) there would not be an unacceptable impact on the amenity of neighbouring residents; and</li> <li>c) sufficient amenity space, parking, bin storage and cycle parking is available.</li> </ul>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy setting out criteria for allowing conversions and sub-divisions. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
Policy H7: Review Mechanisms	<ol style="list-style-type: none"> <li>1. If a reduced contribution to affordable housing than that which is required by the Local Plan is proposed and justified on viability grounds, the Council will, where it considers appropriate, require a viability review mechanism to be secured.</li> <li>2. Based on the outcome of the review/s of viability, the Council will seek to recover in full or in part any affordable housing contributions that would otherwise have been secured under the Local Plan affordable homes policy.</li> <li>3. The viability review mechanism will specify a trigger point or points for undertaking viability review which will reflect:               <ol style="list-style-type: none"> <li>a) a late stage review which should be undertaken prior to the sale or lease of 75% of market homes, or at an agreed similar point; and</li> <li>b) for large-scale phased development, an additional mid-stage review prior to implementation of the second half or later phase/s of the development.</li> </ol> </li> <li>4. In the case of a late stage review, the contribution will be by payment in lieu, unless otherwise agreed. Should an additional mid-stage review be agreed, the Council will seek any additional affordable housing provision on-site unless it is satisfactorily demonstrated to be impractical.</li> <li>5. Any further contributions secured via this review mechanism will be capped at the extent of additional contribution necessary to meet the minimum Local Plan affordable housing policy requirement considering what was already secured at the time of determining the planning application.</li> </ol>	<p>No Likely Significant Effect</p> <p>This sets out the affordable housing review process. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>
Policy H8: First Homes	<p><b>Minimum requirements</b></p> <ol style="list-style-type: none"> <li>1. A minimum of 25% of affordable homes provided either on-site or off-site or as a financial contribution in lieu of on-site provision in line with the Council’s adopted affordable housing requirements are required to be First Homes.</li> <li>2. First Homes are required to be sold at a minimum discount of at least 30% of the market value of homes available for sale locally of the same size and type as those proposed. The minimum discount will be secured in perpetuity.</li> <li>3. Where the affordable housing contribution for a proposed development comprises a mixture of homes and financial contributions towards affordable housing, First Homes are required to form 25% of the overall monetary value of affordable housing contributions.</li> </ol> <p><b>First Homes Exception Sites</b></p> <ol style="list-style-type: none"> <li>4. Residential development proposals on qualifying small sites comprising primarily First Homes will be permitted where they are:               <ol style="list-style-type: none"> <li>a) adjacent to existing settlements; and</li> <li>b) proportionate in size to them.</li> </ol> </li> <li>5. The minimum number of market homes required to make delivery of a First Homes Exception Site viable without grant funding will be permitted where:               <ol style="list-style-type: none"> <li>a) an applicant demonstrates that the scheme would be unviable without the inclusion of market housing;</li> <li>b) inclusion of market housing does not inflate the threshold land value<sup>22</sup>; and</li> </ol> </li> </ol>	<p>No Likely Significant Effect</p> <p>This sets out the requirements for affordable homes. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>

<sup>22</sup> This is the minimum land value likely to trigger an owner to sell the land.

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<p>c) any market housing is suitably integrated into the First Homes development.</p> <p>6. Small quantities of other forms of affordable housing may also be permitted on a First Homes exception site where the applicant demonstrates evidence of significant local need for that type of housing.</p>	
Policy E11: Equine-related development	<p>1. Development proposals for private and/or commercial horse or other equine-related development are required to:</p> <ul style="list-style-type: none"> <li>a) provide adequate stabling, fencing and land for grazing and exercise is available to ensure the proper care of the animals, in compliance with the latest Government-published guidelines and standards;</li> <li>b) be of a scale, location, design and layout that is acceptable in relation to its intended use and in terms of its impact on the character of the built environment and surrounding landscape;</li> <li>c) have no unacceptable impact on the nature conservation or biodiversity value of the site and the quality of pasture, by reason of overgrazing or otherwise;</li> <li>d) re-use existing buildings where feasible, or, in the case of a new facility, is satisfactorily integrated with existing buildings, avoiding isolated or otherwise visually prominent locations; and</li> <li>e) have no unacceptable impact on the amenity of neighbouring or nearby properties by reason of noise, smell, overlooking, lighting of external areas or other general disturbance.</li> </ul> <p>2. Particular consideration will be given to the cumulative adverse impacts of equine related development proposals in the vicinity of the proposed site and the wider area and may impose appropriate planning conditions where necessary.</p> <p><b>Commercial developments</b></p> <p>3. Commercial equine-related development is also required to meet the following criteria:</p> <ul style="list-style-type: none"> <li>a) Development proposals are required to ensure that they do not prejudice the agricultural operation of any holding.</li> <li>b) Development proposals likely to generate a significant number of vehicular trips are required to be accompanied by a transport assessment to show that there will be no unacceptable impacts on highway safety and that the safety of horses, riders and other road users will not be compromised.</li> </ul>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy that does not provide for a quantum of development but rather sets the parameters under which horse-related development proposals are most likely to be deemed acceptable.</p> <p>All horse-related development proposals that did come forward would be subject to the provisions of Policy P5 in adopted LPP1 which states that <i>'Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development'</i>.</p> <p><b>It is recommended a slight wording alteration be made to the policy to provide clarity that all Habitats sites should be protected. E.g. wording should be changed to "have no unacceptable impact on nature conservation or biodiversity value" without "of the site".</b></p> <p>No linking impact pathways.</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
Policy P6/P7: Biodiversity in New Developments	<p><b>General principles</b></p> <ol style="list-style-type: none"> <li>1. Development proposals, including those exempt from minimum biodiversity net gain standards, are required to seek maximum biodiversity gain and to follow the mitigation hierarchy.</li> <li>2. Development proposals within or adjacent to a Biodiversity Opportunity Area (BOA) are required to:               <ol style="list-style-type: none"> <li>a) contribute towards the achievement of the objectives of the BOA as set out in the relevant BOA policy statement<sup>23</sup> (and its successor revision documents);</li> <li>b) protect and enhance designated and priority habitats and species within the BOA; and</li> <li>c) improve habitat connectivity across and/or into the BOA.</li> </ol> </li> <li>3. In addition to the BOAs, biodiversity measures are required to take account of other national, regional and local biodiversity strategies.</li> <li>4. Major development proposals are required to set out plans for long term management and maintenance of on-site biodiversity.</li> </ol> <p><b>Planting schemes, landscaping and water management</b></p> <ol style="list-style-type: none"> <li>5. 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.</li> <li>6. Tree canopies are expected to be retained and new tree planting is expected to focus on the creation of new connected tree canopies and/or the extension of existing canopies, unless doing so would adversely impact on sensitive species or habitats. Tree planting schemes are expected to provide resilience in terms of climate, disease and ageing, incorporating large species with long lifespans where opportunities arise.</li> <li>7. Planting schemes are expected to use UK sourced, native species, unless imported strains of native species would offer greater resilience and are free from disease.</li> </ol> <p><b>Measures on building structures</b></p> <ol style="list-style-type: none"> <li>8. Development proposals are required to include appropriate features in or on building structures that support nature, will last for the lifetime of the development and will cater for appropriate species and habitats.</li> </ol> <p><b>Site design</b></p> <ol style="list-style-type: none"> <li>9. Development proposals are expected to be designed to create areas of new habitat and provide appropriate links and corridors between new and existing habitats, avoiding and reversing fragmentation and species isolation. Development sites and built features are expected to be permeable for wildlife.</li> <li>10. In areas where invasive species are present, site design should not facilitate their spread. Where invasive species are present on development sites, they should be eradicated, or controlled where eradication is not possible. Planting schemes must not include invasive plants.</li> </ol>	<p>No Likely Significant Effect</p> <p>This policy is a positive design/development management policy, providing for greater biodiversity in new developments. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

<sup>23</sup> SyNP (2019) Biodiversity Working Group. [Online]. Available online at <https://surreynaturepartnership.org.uk/our-work/>.

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<p>11. Major development proposals are expected, and minor development proposals are encouraged, to deliver measures that promote a sense of community ownership of green spaces and habitats.</p> <p><b>Biodiversity Net Gain</b></p> <p>12. Qualifying development proposals are required to achieve a biodiversity net gain of at least 20 per cent, or the advised national minimum amount, whichever is greater, measured using the national biodiversity net gain calculation methodology.</p> <p>13. 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<sup>24</sup>. Where these are present, a measurable net gain for those features is required.</p> <p>14. 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.</p> <p>15. 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, or a period of time set out in national policy or legislation if this is greater.</p> <p>16. Where the applicant is unable to provide the gains on-site, provide the gains off-site or fund gains off-site on third-party sites, a justified and proportionate financial contribution to fund off-site measures will be secured.</p> <p>17. Development proposals for the creation of biodiversity sites will be supported where these are well located and will be appropriately managed in order to align with local, regional and national strategies and provide best biodiversity value.</p>	
<p>Policy P8/9: Protecting important habitats and species</p>	<p>1. Development proposals for sites that contain or are adjacent to irreplaceable habitats, priority habitats, habitats hosting priority species, sites designated for their biodiversity value and all aquatic habitats are required to preserve the relevant ecological features through the application of the mitigation hierarchy, and to deliver enhancements to the ecological features in line with Policy P6/P7. The habitats should be protected by appropriate buffers and, if necessary, barriers in order to prevent adverse impacts, including those resulting from recreational use.</p> <p><b>Irreplaceable habitats</b></p> <p>2. Irreplaceable habitats will be protected. Development proposals that result in the loss, damage or deterioration of irreplaceable habitats will be refused, unless there are wholly exceptional reasons and the exceptional benefits of the development proposal outweigh the loss of the habitats. Proposals for compensation will not form part of this assessment. However, if wholly exceptional reasons have been demonstrated, a suitable compensation strategy to address the level of harm predicted will be required that delivers appropriate and proportionate compensation in terms of quality and quantity. Proposals for compensation will be additional to other requirements relating to biodiversity, including biodiversity net gain requirements.</p>	<p>No Likely Significant Effect</p> <p>This policy is a positive design/development management policy, protecting priority species and habitats on undesignated land. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

<sup>24</sup> For example, identified through Natural England’s IUCN Species Status Review project. See <http://publications.naturalengland.org.uk/category/4707656804597760> and <http://archive.jncc.gov.uk/default.aspx?page=3352>).



Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<p>3. 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).</p> <p><b>Priority species and habitats</b></p> <p>4. Development proposals are required to protect and enhance priority species and habitats. They include:</p> <ul style="list-style-type: none"> <li>a) Species and Habitats of Principal Importance for Conservation (of biological diversity in England);</li> <li>b) species and habitats identified as priorities in the Local Nature Recovery Strategy and strategies produced by Natural England and the Surrey Nature Partnership;</li> <li>c) wildlife corridors and stepping-stones as defined by the NPPF or identified in the Local Nature Recovery Strategy, in Development Plan Documents, by Natural England, in Supplementary Planning Documents and in Surrey Nature Partnership documents; and</li> <li>d) compensatory habitat sites and biodiversity net gain sites.</li> </ul> <p><b>Ancient woodland and significant trees</b></p> <p>5. Where ancient woodland falls within or adjacent to a development site, the following measures are required.</p> <ul style="list-style-type: none"> <li>a) The submission of information setting out the location of all significant ancient or veteran trees (a BS5837 Survey).</li> <li>b) An appropriate buffer around the ancient woodland of a minimum of 15 metres.</li> <li>c) A clear separation between the woodland and the rest of the development, delineated by a physical feature such as a wildlife permeable barrier, a cycle lane, path or lightly trafficked road.</li> <li>d) Site design that discourages harmful activities such as the use of the woodland as a cut-through where well-used paths do not currently exist.</li> </ul> <p>6. Development proposals for sites that contain significant trees, including ancient and veteran trees and ancient woodland, are expected to incorporate them and their root structures and understorey in undeveloped land within the public realm, and to provide green linkages between them.</p>	
<p>Policy P10: Contaminated Land</p>	<ul style="list-style-type: none"> <li>1. Development proposals that comprise or include land that is known or suspected to be affected by contamination are required to submit appropriate Site Risk Assessments, which establish the full nature and extent of any land contamination that may adversely affect sensitive receptors, both on-site and in the surrounding area.</li> <li>2. Where evidence of contamination is identified, an Options Appraisal and Remediation Strategy are required to be submitted, which must demonstrate that the land is to be made fit for its intended purpose, detailing: <ul style="list-style-type: none"> <li>a) the appropriate sustainable remediation measures that will be implemented in order to prevent and/or avoid significant harm to sensitive receptors, both on-site and in the surrounding area, including future users of the site; and</li> <li>b) the appropriate mitigation measures that will be implemented in order to reduce to a minimum any risks presented to the health of sensitive receptors from land contamination.</li> </ul> </li> <li>3. A verification report must be submitted to the Council and approved prior to either occupation or use, which demonstrates the agreed remediation measures have been implemented effectively.</li> </ul>	<p>No Likely Significant Effect</p> <p>This is an environmentally positive policy setting out remediation requirements for contaminated land. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<p>4. Where insufficient information is provided, or the relevant reports indicate that there will be an unacceptable adverse impact on sensitive receptors which cannot be adequately prevented, avoided, and/or mitigated through appropriate remedial measures, the planning application will be refused.</p>	
<p>Policy P11: Air quality and Air Quality Management Areas</p>	<ol style="list-style-type: none"> <li>1. Development proposals should have regard to the need to improve air quality and reduce the effects of poor air quality.</li> <li>2. Development proposals must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air.</li> <li>3. Development proposals are required to include a detailed Air Quality Assessment, where:               <ol style="list-style-type: none"> <li>a) major development is proposed and has the potential, including when combined with the cumulative effect of other approved developments and site allocations, to have significant adverse impacts on air quality;</li> <li>b) the proposed development has the potential to result in significant adverse impacts and is within, and in close proximity to, a sensitive habitat, including any site designated for its nature conservation value;</li> <li>c) development would introduce or intensify sensitive uses within an area that is known to experience existing poor air quality conditions, including an Air Quality Management Area (AQMA); and/or</li> <li>d) the proposed development would be likely to result in the increase of air pollution levels within an Air Quality Management Area (AQMA).</li> </ol> </li> <li>4. Where an Air Quality Assessment identifies potential significant adverse impacts on sensitive receptors from any source of emissions to air, the applicant must submit an Emissions Mitigation Assessment, detailing the appropriate avoidance and mitigation measures that will be implemented to prevent significant adverse impacts on sensitive receptors, including future occupiers or users of the site, from any sources of emissions to air.</li> <li>5. Proposed avoidance and mitigation measures are expected to follow the 'Air Quality Avoidance and Mitigation Hierarchy' and be designed to maximise their ecological and aesthetic value.</li> <li>6. Development proposals within, and in close proximity to, Air Quality Management Areas (AQMAs) are required to demonstrate how the proposed avoidance and mitigation measures would make a positive contribution towards the aims of the Council's Air Quality Strategy and the appropriate Air Quality Action Plan.</li> <li>7. A 'Verification Report' must be submitted to the Council and approved prior to the development's occupation or use, which demonstrates the agreed avoidance and mitigation measures have been implemented effectively.</li> <li>8. Where required, planning obligations will be used to secure contributions to tackle poor air quality and/or for air quality monitoring.</li> <li>9. Where there will be significant adverse impacts that cannot be effectively mitigated, the planning application will be refused.</li> </ol>	<p>No Likely Significant Effect</p> <p>This is an environmentally positive policy regarding air quality improvement and management. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
<p>Policy P12: Water Quality, Waterbodies and Riparian Corridors</p>	<ol style="list-style-type: none"> <li>1. Development proposals that would result in a deterioration in the chemical or ecological status/potential of a waterbody, or prevent improvements to the chemical or ecological status/potential, will not be permitted.</li> <li>2. Development proposals that contain or are in the vicinity of a waterbody are required to demonstrate that they have explored opportunities to improve its chemical and ecological status/potential. Where a waterbody is covered by the</li> </ol>	<p>No Likely Significant Effect</p> <p>This is a design/development management policy to protect water</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<p>Water Environment Regulations, proposals are required to align with the objectives of the Thames river basin district River Basin Management Plan.</p> <p>3. Non-residential developments, excluding essential infrastructure, that would have a very high water usage are expected to include water collection and storage measures sufficient to avoid, or significantly reduce if avoidance is not possible, abstraction from existing surface-level and groundwater resources or recourse to the public water supply.</p> <p><b>Development affecting watercourses</b></p> <p>4. Development proposals are required to explore opportunities to improve and/or restore the flow and functioning of a watercourse.</p> <p>5. Development proposals are required to retain or reinstate an undeveloped buffer zone on both sides of a main river measuring a minimum of 10 metres from the top of the riverbank that is supported by a working methods statement detailing how the buffer zone will be protected during construction, and a Landscape and Ecological Management Plan detailing how it will be enhanced in the long-term. For ordinary watercourses, an appropriate buffer is expected that is sufficient to protect and enhance the biodiversity and amenity value of the watercourse.</p> <p>6. Development proposals that include the culverting of watercourses, hard bank revetment or which prevent future opportunities for de-culverting and naturalisation of watercourse banks will not be permitted. Development proposals are expected to return banks to a natural state.</p> <p>7. Where barriers to fish movement (e.g. weirs) are present in a watercourse, proposals are expected to include the removal of that barrier, or measures to allow for the natural movement of fish within the watercourse where removal is not feasible.</p> <p>8. 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.</p> <p><b>Ground and surface drinking water</b></p> <p>9. Development proposals within Source Protection Zones and Drinking Water Protected Areas are required to demonstrate that they have had regard to all Environment Agency position statements that are relevant to the proposals.</p>	<p>quality, water course flow, ground, and surface drinking water. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways</p>
<p>Policy P13: Sustainable surface water management</p>	<p><b>All development proposals</b></p> <p>1. Drainage schemes are required to intercept as much rainwater and runoff as possible, including runoff from outside the site.</p> <p>2. Greenfield sites are required to achieve runoff rates and volumes consistent with greenfield conditions. Previously developed sites are required to achieve runoff rates and volumes as close as reasonably practicable to greenfield runoff rates. In any case, runoff rates and volumes must be no greater than the conditions of the site prior to the development.</p> <p>3. Development proposals are required to maximise the use of permeable surfaces across the development site.</p>	<p>No Likely Significant Effect</p> <p>This is a design/development management policy to ensure sustainable surface water management. It does not provide for a quantum of development or identify any locations for development</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<p>4. Drainage schemes are expected to avoid the use of boreholes or other deep structures for the discharge of surface water to ground, except for clean roof water.</p> <p><b>Major developments and developments in areas at risk of flooding</b></p> <p>5. Development proposals are required 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.</p> <p>6. 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.</p> <p>7. When designing SuDS, development proposals are required to:</p> <ol style="list-style-type: none"> <li>follow the SuDS Sustainability Hierarchy;</li> <li>comply with the technical standards and design requirements set out in Defra’s non-statutory technical standards for sustainable drainage systems;</li> <li>comply with guidance produced by, and be reviewed and agreed by, the Lead Local Flood Authority (Surrey County Council);</li> <li>ensure that surface water runoff is managed as close to its source as possible;</li> <li>maximise biodiversity and amenity value, taking full advantage of opportunities for habitat creation and enhancement and improvements to water quality;</li> <li>incorporate a management treatment train to minimise risk of pollution to ground and surface waterbodies; and</li> <li>ensure that runoff from all hard surfaces receives an appropriate level of treatment.</li> </ol> <p>8. Proposals for infiltration SuDS are required to:</p> <ol style="list-style-type: none"> <li>provide evidence showing that there is at least 1 metre of vertical distance between the base of the infiltration system and the maximum likely groundwater level.</li> <li>if located within Source Protection Zone 1, an area of known land contamination and/or an area with high seasonal groundwater, undertake a hydrogeological risk assessment where anything other than clean roof drainage is to be received.</li> </ol>	<p>No linking impact pathways</p>
<p>Policy P14: Regionally important geological/geomorphological sites</p>	<ol style="list-style-type: none"> <li>Development proposals that are likely to materially harm the conservation interests of Regionally Important Geological/Geomorphological Sites (RIGS) as shown on the policies map, and any unmapped features that meet the definition of a RIGS, are required to demonstrate that the need for the development clearly outweighs the impact on the conservation interests.</li> <li>Development proposals are required to make every effort to prevent harm to the conservation interests of the RIGS through avoidance measures. Where this is not possible, every effort is required be made to minimise harm through mitigation measures. The applicant is required to demonstrate that any necessary avoidance and mitigation measures will be implemented and maintained effectively.</li> </ol>	<p>No Likely Significant Effect</p> <p>This is design/development management policy which protects regionally important geological sites. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness	<ol style="list-style-type: none"> <li>1. Development proposals are required to demonstrate how they will achieve the ten characteristics of well-designed places as set out in the National Design Guide (2019):               <ol style="list-style-type: none"> <li>a) Context – enhances the surroundings</li> <li>b) Identity – attractive and distinctive</li> <li>c) Built form – a coherent pattern of development</li> <li>d) Movement – accessible and easy to move around</li> <li>e) Nature – enhanced and optimised</li> <li>f) Public space – safe, social and inclusive</li> <li>g) Uses – mixed and integrated</li> <li>h) Homes and buildings – functional, healthy and sustainable</li> <li>i) Resources – efficient and resilient</li> <li>j) Lifespan – made to last</li> </ol> </li> <li>2. Development proposals are required to have regard to relevant national and local design guidance or codes.</li> <li>3. Development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place. Development proposals should respond positively to the history of a place, significant views (to and from), surrounding context, built and natural features of interest, prevailing character, landscape and topography. 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. 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.</li> <li>4. Development proposals are expected to demonstrate high quality design at the earliest stages of the design process, and then through the evolution of the scheme, including in relation to:               <ol style="list-style-type: none"> <li>a) Layout – settlement pattern of roads, paths, spaces and buildings, urban grain, plot sizes, building patterns, rhythms and lines</li> <li>b) Form and scale of buildings and spaces - height, bulk, massing, proportions, profile and roofscapes</li> <li>c) Appearance</li> <li>d) Landscape – landform and drainage, hard landscape and soft landscape</li> <li>e) Materials</li> <li>f) Detailing</li> </ol> </li> <li>5. Development proposals are required to reflect appropriate residential densities that are demonstrated to result from a design-led approach taking into account factors including:               <ol style="list-style-type: none"> <li>a) the site size, characteristics and location;</li> <li>b) the urban grain of the area and appropriate building forms, heights and sizes for the site; and</li> <li>c) the context and local character of the area.</li> </ol> </li> </ol>	<p>No Likely Significant Effect</p> <p>This is a design/development management policy for achieving high quality design and ensuring local distinctiveness is maintained. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<p>6. 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.</p> <p>7. Allocated sites that are in separate ownerships are required to be designed in a comprehensive manner to ensure the best efficient use of land and integrated development. Development proposals are expected to be designed so as not to hinder the potential future delivery of adjoining development sites.</p>	
<p>Policy D5: Protection of Amenity and Provision of Amenity Space</p>	<p><b>Protection of amenity</b></p> <p>1. Development proposals are required to avoid having an unacceptable impact on the living environment of existing residential properties or resulting in unacceptable living conditions for new residential properties, in terms of:</p> <ul style="list-style-type: none"> <li>a) Privacy and overlooking</li> <li>b) Visual dominance and overbearing effects of a development</li> <li>c) Access to sunlight and daylight</li> <li>d) Artificial lighting</li> <li>e) Noise and vibration</li> <li>f) Odour, fumes and dust</li> </ul> <p><b>Provision of amenity space</b></p> <p>2. All new build residential development proposals, including flatted development, are expected to have direct access to an area of private outdoor amenity space. In providing appropriate outdoor amenity space, both private and shared, development proposals are required to:</p> <ul style="list-style-type: none"> <li>a) take into account the orientation of the amenity space in relation to the sun at different times of year;</li> <li>b) address issues of overlooking and enclosure, which may otherwise impact unacceptably on the proposed property and any neighbouring properties dwellings; and</li> <li>c) design the amenity space to be of a shape, size and location to allow effective and practical use of the space by residents.</li> </ul> <p>3. All balconies or terraces provided on new flatted development proposals are required to be:</p> <ul style="list-style-type: none"> <li>a) designed as an integrated part of the overall design; and</li> <li>b) a minimum of 4sqm</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy to ensure existing and new residents retain privacy and amenity. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
<p>Policy D5a External Serving Features and Stores</p>	<p>1. Development proposals are required to demonstrate that:</p> <ul style="list-style-type: none"> <li>a) bin storage, cycle parking, and electric vehicle charging points, whilst being designed to meet practical needs, are integrated into the built form and do not detract from the overall design of the scheme or the surrounding area; and</li> <li>b) external servicing features are designed as an integrated part of the overall design or are positioned to minimise their visual impact.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy regarding external Serving Features and Stores. It does not provide for a quantum of development or identify any locations for development</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
Policy D6: Shopfront design and Security	<ol style="list-style-type: none"> <li>1. Shopfronts are required to be designed to a high quality, including being responsive to, and where possible enhancing, the character and appearance of their surrounding context and the building it forms part of. Development proposals are also required to contribute to the continued preservation or enhancement of the Borough’s heritage assets, and with their design having been informed by relevant national and local design guidance.</li> <li>2. All new and alterations to shopfronts are expected to use high quality sustainable materials and to be of a design that retains, or relates well to the proportion, scale, detailing, period and character of the host building as a whole, as well as the wider street scene (<u>setting</u>). Unless the architecture of the building indicates otherwise, new and replacement shopfronts (<u>must</u>) are required to include as a minimum the following features within their design:               <ol style="list-style-type: none"> <li>a) Fascia</li> <li>b) Pilasters</li> <li>c) Cornice</li> <li>d) Stall riser(s)</li> <li>e) Retail window(s)</li> <li>f) Doorway</li> </ol> </li> <li>3. Shopfronts that contribute positively to the established character and appearance of the building they form part of, the surrounding context or which are identified as being of architectural or historic interest must be retained or restored.</li> <li>4. Original features and details, including but not limited to fascias, pilasters, transoms, mullions and stall-risers, are expected to be retained where they are of architectural or historic interest, or where they contribute positively to the character and appearance of the street scene or area. Where a shop occupies the ground floor of more than one building, the design and proportions of each shopfront is expected to relate to each individual building. Single shopfronts that span two or more buildings, disregarding architectural detail and decoration will not be supported.</li> <li>5. Shopfronts are expected to present an active frontage to the street scene at all times and ensure access for all.</li> <li>6. Where security is essential, preference will be given to internal open mesh grilles. Where it is demonstrated that additional security is necessary, following the consideration first of other measures such as security glazing, security lighting, closed-circuit TV &amp; alarm systems, external open mesh grilles may be supported. The housing for retractable open mesh grilles should be integrated into the shopfront façade (<u>fascia</u>). External solid shutters that obscure the shopfront then planning permission will be refused (<u>will not be supported</u>).</li> <li>7. Blinds, canopies, awnings or any such similar device affixed to a shopfront are expected to meet the following criteria (<u>will be considered favourably if</u>):               <ol style="list-style-type: none"> <li>a) the size, colour, design and materials are appropriate to the character and features of the building, and the character and appearance of the area;</li> <li>b) the housing unit of retractable canopies is recessed inconspicuously or integrated into the plane of the shopfront and painted in a colour to match; and</li> </ol> </li> </ol>	<p>No linking impact pathways</p> <p>No Likely Significant Effects</p> <p>This is a design/development management policy regarding appropriate shop front design and security. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
Policy D7: Advertisements, hanging signs, and illumination	<p>c) the housing unit does not obscure features of architectural or historic interest when fixed to the building; and by reason of height or degree of projection it does not interfere with free pedestrian or traffic movement.</p> <p>1. Development proposals for advertisement and signage are required to demonstrate that there is no harm to amenity or public safety by reason of:</p> <ul style="list-style-type: none"> <li>a) Design</li> <li>b) Size</li> <li>c) Colour</li> <li>d) Position</li> <li>e) Materials</li> <li>f) Amount, type &amp; and scale of text</li> <li>g) Method and degree of illumination/luminance</li> <li>h) Cumulative clutter</li> </ul> <p>2. Advertisements and signage are expected to be designed to a high quality, informed by relevant national and local design guidance.</p> <p>3. Advertisements and signage are expected to be responsive to, and enhance the appearance, character and vitality of an area, by having regard to their size, materials, construction, location, level and method of illumination and cumulative impact.</p> <p>4. Advertisements and signage on buildings are expected to be integrally designed to respect the entire elevation and proportions of the building and its shop front frame, taking account of any architectural features and detailing of the building, and should be complementary to the street scene in general.</p> <p>5. Development proposals that would result in harm to, or concealment of, architectural features and detailing of historic or architectural significance will be refused.</p> <p>6. Development proposals affecting heritage assets and their setting will be required to preserve or enhance and where appropriate better reveal their architectural and/or historical significance.</p> <p>7. Illuminated advertisements are required to not have a detrimental impact on the amenity of adjoining properties and wildlife habitats.</p>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy with regards to signage and ensuring building design and character are retained. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways</p>
Policy D8: Public realm	<p>1. All public realm is required be designed as an integral part of new development and its future care and maintenance secured.</p> <p>2. High quality new or improved public realm proposals are required to demonstrate that:</p> <ul style="list-style-type: none"> <li>a) they are informed by their context, including the landscape, townscape, important views and historic character;</li> <li>b) the design responds to the character, location and function of the spaces and surrounding buildings, and creates a sense of identity;</li> <li>c) it contains and reveals focal points and landmarks to enable ease of movement and legibility;</li> <li>d) it creates attractive, safe and, where appropriate, lively streets with visual interest at pedestrian level;</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy regarding the design of the public realm. It does not provide for a quantum of development or identify any locations for development</p>



Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>e) it maximises opportunities for activity and enjoyment, and encourages social interaction and community cohesion;</li> <li>f) it maximises opportunities to incorporate soft landscaping including trees, hedges and other planting, appropriate to both the scale of buildings and the space available;</li> <li>g) all new streets are tree-lined unless there are clear, justifiable and compelling reasons why this would be inappropriate, and their long-term maintenance is secured;</li> <li>h) the materials are sustainable, durable and long-lasting; and help create and reinforce local distinctiveness; and</li> <li>i) it takes a coordinated approach with adjacent sites/phases in terms of the palette of materials, and the design and siting of street furniture, boundary treatments, lighting and signage.</li> </ul> <p>3. Proposals for public spaces are expected to consider the opportunity to provide:</p> <ul style="list-style-type: none"> <li>a) flexible, multi-use and adaptable community spaces;</li> <li>b) a mobility hub on its fringes, facilitating access to low carbon and shared modes of transport; and</li> <li>c) public art that responds appropriately to local context and history, contributes to community engagement and ownership, has been considered and assessed against the Council's Art Strategy and where its future care and maintenance is secured.</li> </ul>	<p>No linking impact pathways</p>
<p>Policy D9: Residential infill development proposals</p>	<ul style="list-style-type: none"> <li>1. Residential infill development proposals are required to:               <ul style="list-style-type: none"> <li>a) integrate well with surrounding development and the environment;</li> <li>b) respond positively to the existing character and identity of the local area;</li> <li>c) avoid unacceptable impacts on the amenity of neighbouring residents; and</li> <li>d) incorporate landscaping measures and ensure that sufficient amenity space, parking, bin storage and cycle parking is available and that they relate well to the buildings within the site.</li> </ul> </li> <li>2. Piecemeal development proposals will be resisted. Where the Council considers that land has come forward which has been artificially subdivided, it will require appropriate infrastructure contributions commensurate with what would have been required on the larger site. Contributions will be based on a level of development across the comprehensive area which the Council considers appropriate.</li> </ul> <p><b>Infilling: frontage development proposals</b></p> <ul style="list-style-type: none"> <li>3. Proposals for frontage development are required to have regard to the existing:               <ul style="list-style-type: none"> <li>a) urban grain, plot sizes, building patterns, rhythms and lines;</li> <li>b) form and scale of buildings and spaces - height, bulk, massing, proportions and roofscapes;</li> <li>c) appearance; and</li> <li>d) landscape and boundary treatments.</li> </ul> </li> </ul> <p><b>Infilling: backland development proposals</b></p> <ul style="list-style-type: none"> <li>4. Proposals for backland development are required to:</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy with regards to ensuring intensification of residential development follows good design principles. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<p>a) create a positive 'street' entrance, provide safe pedestrian and cycling access and suitable access for emergency and refuse vehicles, and avoid long, narrow and isolated access points. Access routes must be designed to avoid having an unacceptable impact in terms of noise or light on the existing dwellings; and</p> <p>b) demonstrate that relationships with both existing neighbouring development and buildings/gardens within the site are acceptable, taking into account back to back or back to front distances. The privacy of existing and proposed residential properties should be respected by any new layout.</p> <p><b>Infill development proposals in villages</b></p> <p>5. Additionally, proposals for infill development within villages are required to:</p> <p>a) reflect development forms which respect the character and context of the village and avoid layouts that are overly formalised where surrounding village patterns have grown organically;</p> <p>b) ensure that the transitional character of edge of village/settlement areas is not lost and that hard urban forms are not introduced in semi-rural environments; and</p> <p>c) maximise the provision of high quality, safe and direct walking and cycling routes and links to key village facilities.</p>	
<p>Policy D10: Noise impacts</p>	<p>1. Development proposals for noise sensitive uses are required to clearly identify any likely adverse noise impacts on the sensitive receptors that are intended to use or occupy the development from existing nearby sources of noise.</p> <p>2. Development proposals for noise generating uses are required to clearly identify any likely adverse noise impacts arising from the proposed development on existing nearby sensitive receptors, including the natural environment.</p> <p>3. Where consideration under (1) or (2) indicates the potential for Observed Adverse Effect Levels of noise, planning applications are required to include a Noise Impact Assessment, which considers the relationship in detail.</p> <p>4. Where evidence of an Observed Adverse Effect Level noise impact exists, as defined in the Noise Exposure Hierarchy, the applicant is required to demonstrate how the proposed development will be designed and implemented in order to:</p> <p>a) prevent any present and very disruptive Significant Observed Adverse Effect levels,</p> <p>b) avoid any present and disruptive Significant Observed Adverse Effect levels; and</p> <p>c) mitigate any present and intrusive Lowest Observed Adverse Effect levels.</p> <p>5. The applicant proposing the development proposal (or 'agent of change') is responsible for ensuring that:</p> <p>a) all potential Observed Adverse Effect Levels of noise, either impacting on or emanating from the proposed development proposal, are identified, and</p> <p>b) the prevention, avoidance and/or mitigation measures required to manage those noise impacts are implemented effectively.</p> <p>6. A Verification Report is required to be submitted to the Council and approved prior to the development's occupation or use, which demonstrates the agreed avoidance and mitigation measures have been implemented effectively.</p> <p>7. Where there will be an unacceptable adverse effect on sensitive receptors which cannot be adequately prevented, avoided, and/or mitigated, the planning application will be refused.</p>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy ensuring development considers noise sensitive areas etc. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
Policy D10a: Light Impacts and Dark Skies	<p><b>Light-Generating Development</b></p> <ol style="list-style-type: none"> <li>1. Development proposals are required to be designed to minimise obtrusive light (light pollution) and the adverse impacts of obtrusive light on sensitive receptors. Consideration must be given to potential adverse impacts on privacy, amenity, and the natural environment, including wildlife, sensitive habitats, and sites designated for their nature conservation value.</li> <li>2. Proposals for light-generating development, or proposals for light-sensitive development that are likely to be affected by existing artificial lighting, are required to submit a Light Impact Assessment as part of the planning application. Light Impact Assessments are required to clearly detail any potential significant adverse impacts that artificial lighting might have on privacy, amenity, and the natural environment, including wildlife, sensitive habitats and sites designated for their nature conservation value.</li> <li>3. Where potential significant adverse impacts from artificial lighting have been identified, Light Impact Assessments are required to detail the appropriate avoidance and mitigation measures that will be implemented to prevent, avoid and/or mitigate those impacts.</li> <li>4. Proposals for light-generating development are required to prevent and/or avoid unacceptable light spillage into natural terrestrial and aquatic habitats, or their buffer zones.</li> <li>5. Where there will be an unacceptable adverse impact on sensitive receptors which cannot be avoided and/or adequately mitigated, the planning application will be refused.</li> </ol> <p><b>Dark Skies</b></p> <ol style="list-style-type: none"> <li>6. In remote locations of the Surrey Hills AONB, with darker skies, development proposals that cause light pollution will be resisted.</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy ensuring development considers light impacts and dark skies. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy D11: The Corridor of The River Wey (and Guildford) and Godalming Navigations	<ol style="list-style-type: none"> <li>1. Development proposals which impact The River Wey and Godalming Navigations and its environs are required (be expected) to:             <ol style="list-style-type: none"> <li>a) conserve and enhance the distinctive character of the (River Wey and the Guildford and Godalming) Navigations, including its visual setting, amenity, recreational and ecological value, and architectural &amp; and historic interest;</li> <li>b) protect and conserve landscape features, buildings, structures and archaeological remains that are associated with the river's unique character, history and heritage;</li> <li>c) establish a positive relationship with the Navigations' setting and waterfront character and its historic interest, taking full advantage of its location, addressing the waterway as a frontage and opening up views;</li> <li>d) protect, and where possible, enhance key existing views to, from, across and along the river, including those identified in the Guildford Town Centre Views SPD; and</li> <li>e) integrate flood risk mitigation measures where the design and material palette are responsive to the character and the site's immediate context.</li> </ol> </li> <li>2. Development proposals adjoining the river are expected to seek to improve visual and physical public access to and along the river by:             <ol style="list-style-type: none"> <li>a) providing direct, safe and clear public access to and along the river;</li> </ol> </li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy to protect the special character of the River Wey and Guildford and Godalming Navigations. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>b) providing a 'joined-up' approach to river access, considering access and uses up and down stream, as well as across the river channel and the adjoining areas to the existing towpath; and</li> <li>c) enabling and supporting the promotion of active and healthier lifestyles.</li> </ul>	
<p>Policy D12: Sustainable and low impact development</p>	<p><b>Fabric First</b></p> <ol style="list-style-type: none"> <li>1. Development proposals are required to demonstrate how they have followed a 'fabric first' approach in line with the energy hierarchy.</li> </ol> <p><b>Embodied carbon</b></p> <ol style="list-style-type: none"> <li>2. Development proposals are required to demonstrate that embodied carbon emissions have been minimised by:               <ul style="list-style-type: none"> <li>a) sourcing materials locally where possible; and</li> <li>b) taking into account the embodied carbon of materials based on information provided in a respected materials rating database.</li> </ul> </li> <li>3. Proposals for major development are required to demonstrate how they have considered the lifecycle of buildings and public spaces and the materials used to construct them to reduce lifetime carbon emissions.</li> </ol> <p><b>Energy improvements</b></p> <ol style="list-style-type: none"> <li>4. Development proposals that will improve the energy efficiency and carbon emissions rate of existing buildings to a level significantly better than the Council's adopted standards or national standards for new buildings, whichever is most challenging, are encouraged.</li> </ol> <p><b>Waste</b></p> <ol style="list-style-type: none"> <li>5. Proposals for major development and development proposals that involve the demolition of at least one building and/or engineering works that involve the importation or excavation of hard core, soils, sand and other material are required to submit a Site Waste Management Plan (SWMP).</li> </ol> <p><b>Water efficiency</b></p> <ol style="list-style-type: none"> <li>6. New developments are expected to incorporate measures to harvest rainwater and conserve water resources and, where possible, incorporate water recycling/reuse systems.</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy with regards to energy efficient development reducing impacts on the environment. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
<p>Policy D13: Climate change adaptation</p>	<ol style="list-style-type: none"> <li>1. Development proposals are required to demonstrate how new buildings will:           <ul style="list-style-type: none"> <li>a) be designed and constructed to provide for the comfort, health, and wellbeing of current and future occupiers over the lifetime of the development, covering the full range of expected climate impacts and with particular regard to overheating; and</li> <li>b) incorporate passive heat control measures and the exclusion of conventional air conditioning, in line with the cooling hierarchy.</li> </ul> </li> <li>2. New buildings likely to accommodate vulnerable people should demonstrate that their specific vulnerabilities have been taken into account with a focus on overheating.</li> <li>3. Major development proposals within the urban areas shown on the LPSS policies map are required to show how the urban heat island effect will be addressed through:</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy with regards to ensuring development can adapt to climate change. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>a) choice of materials;</li> <li>b) layout, landform, massing, orientation and landscaping; and</li> <li>c) retention and incorporation of green and blue infrastructure as far as possible.</li> </ul> <p>4. Development proposals are required to demonstrate adaptation for more frequent and severe rainfall events through measures including:</p> <ul style="list-style-type: none"> <li>a) retaining existing and incorporating new water bodies and natural flood management measures;</li> <li>b) designing planting and landscaping schemes to absorb and slow down surface water; and</li> <li>c) the use of permeable ground surfaces wherever possible.</li> </ul> <p>5. Development proposals in and around areas of high risk of wildfire are required to be designed and managed to prevent the ignition and spread of fire, taking into account the risk to health and potential damage to significant habitats.</p>	
Policy D14: Carbon Emissions from Buildings Climate change mitigation	<ul style="list-style-type: none"> <li>1. The development of low and zero carbon and decentralised energy, including low carbon heat distribution networks, is strongly supported and encouraged.</li> <li>2. Where low carbon heat distribution networks already exist, new developments are required to connect to them or be connection-ready unless it can be clearly demonstrated that utilizing a different energy supply would be more sustainable or connection is not feasible.</li> <li>3. Proposals for development within Heat Priority Areas as shown on the Policies Map and all sufficiently large or intensive developments must demonstrate that low carbon heat networks have been given adequate consideration as the primary source of heat.</li> <li>4. New buildings must achieve a reduction in carbon emissions of at least 31 per cent measured against the relevant Target Emission Rate (TER) set out in the Building Regulations 2010 (as amended) (Part L). This is required to be achieved through improvements to the energy performance of the building and the provision of appropriate renewable and low carbon energy technologies on site and/or in the locality of the development. Where it can clearly be demonstrated that this is not possible, offsite offsetting measures will be considered acceptable.</li> </ul>	<p>No Likely Significant Effects</p> <p>This policy does not allocate any sites or identify any specific locations for such proposals.</p>
Policy D15: Renewable and low carbon energy generation and storage	<ul style="list-style-type: none"> <li>1. Proposals for renewable and low carbon energy generation and storage development, covering both power and heat, will be supported, with strong support for community-led initiatives.</li> <li>2. Where such developments are proposed in the Green Belt, climate change mitigation and other benefits will be taken into account when considering whether very special circumstances exist.</li> <li>3. Proposals are required to demonstrate that the design of the scheme has sought to minimise visual impacts and that the management of the site will maximise opportunities for biodiversity and avoid practices that are harmful to biodiversity.</li> <li>4. For temporary permissions, provision must be made for the decommissioning of the infrastructure and associated works and the full restoration of the site once operation has ceased.</li> </ul>	<p>No Likely Significant Effects</p> <p>This policy does not allocate any sites or identify any specific locations for such proposals.</p> <p>Any proposals for renewable and low carbon energy generation that did come forward would be subject to the provisions of Policy P5 in adopted LPP1 which states that '<i>Permission will only be granted for development proposals where it can be demonstrated that</i></p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
Policy D16: Designated heritage assets	<p>(The Council’s objective is to set out a positive strategy for the conservation and enhancement of all designated heritage assets by having a policy that addresses the following issues:)</p> <p><b>Supporting Information</b></p> <ol style="list-style-type: none"> <li>1. All development proposals affecting designated heritage assets, including curtilage buildings and structures and their setting, are required to be supported by an evidence-based Heritage Statement. The level of detail provided within the statement is expected to be proportionate to the asset’s importance and is sufficient to facilitate an understanding of the potential impact. To accord with the requisite of validation a Heritage Statement must:               <ol style="list-style-type: none"> <li>a) have referred to the relevant Historic Environment Record;</li> <li>b) demonstrate a clear understanding of the asset’s significance including all those parts affected by the proposals, and where applicable the contribution made by its setting;</li> <li>c) explain how the asset and its setting will be affected by the proposal, including how the proposal preserves or enhances the heritage asset or better reveals its significance;</li> <li>d) demonstrate what steps have been taken to avoid, minimise or to mitigate any resultant harm; and,</li> <li>e) present a justification for the proposals that explains why any resultant harm is considered to be necessary or desirable.</li> </ol> </li> <li>2. Where applicants fail to provide adequate or accurate detailed information to show the effect of the development on the significance, character and appearance of the heritage asset and its setting, the application will be refused.</li> </ol> <p><b>Harm to/Loss of Significance</b></p> <ol style="list-style-type: none"> <li>3. Development proposals which result in harm to, or loss of, the significance of a designated heritage asset will be considered in line with national policy and guidance.</li> <li>5. Positive action will be sought for those heritage assets at risk through neglect, decay, vacancy, or other threats where appropriate.</li> </ol> <p>(If there is evidence of deliberate neglect of or damage to a heritage asset, the deteriorated state of the asset will not be taken into account.)</p>	<p><i>doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development’.</i></p> <p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to protect designated heritage assets. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy D17: Listed Buildings	<ol style="list-style-type: none"> <li>1. Development proposals are expected to conserve, enhance and where appropriate better reveal the significance of listed buildings and their settings. Where harm to significance is identified this will be considered against Policy D16(3)(Designated Heritage Assets).</li> <li>2. Repairs, alterations or extensions, that directly, indirectly or cumulatively affect the special interest of a statutory listed or curtilage listed building, or development affecting their settings are expected to:               <ol style="list-style-type: none"> <li>a) be of an appropriate scale, form, height, massing and design which respects the host building and its setting;</li> </ol> </li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to protect listed buildings. It does not provide for a quantum of development</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>b) have regard to the historic internal layout as well as the architectural and historic integrity that form part of the special interest of the building;</li> <li>c) reinforce the intrinsic character of the building through the use of appropriate materials, details and building techniques; and</li> <li>d) respect the setting of the listed building including inward and outward views.</li> </ul> <p>3. Development proposals for the demolition/removal of objects or structures fixed to the building or within the curtilage of a Listed Building are required to demonstrate that they are:</p> <ul style="list-style-type: none"> <li>a) incapable of repair for beneficial use or enjoyment; or</li> <li>b) not of special architectural or historic interest as (a structure) an ancillary structure to the principal Listed Building.</li> </ul> <p>4. Proposals involving a change of use of part or the whole of a listed building are required to provide full details of all intended alterations to the building and its curtilage. Support will only be given to those proposals that demonstrate that a building or structure is capable of accommodating the proposed change of use without considerable alteration and consequential loss of special interest or harm to significance.</p> <p>5. Support will be given to proposals that seek to mitigate or adapt to the effects of climate change through energy efficiency improvements where they are consistent with all the following:</p> <ul style="list-style-type: none"> <li>a) The heritage asset’s special architectural or historic interest</li> <li>b) The heritage asset’s character and appearance</li> <li>c) The long-term conservation of the built fabric</li> <li>d) The wider setting of the heritage asset</li> </ul> <p>6. Where conflict between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change will be weighed against any harm to the significance of the heritage asset(s).</p>	<p>or identify any locations for development</p> <p>No linking impact pathways.</p>
<p>Policy D18: Conservation areas</p>	<ul style="list-style-type: none"> <li>1. Development proposals within or which would affect the setting of a Conservation Area are expected to preserve or enhance its special character and appearance. Where harm to/loss of significance is identified this will be considered against Policy D16(3): Designated Heritage Assets.</li> <li>2. Development proposals are required to show how they respect and respond to the history of place, the surrounding context and the preservation or enhancement of the Conservation Area’s special character and local distinctiveness, by having regard to: <ul style="list-style-type: none"> <li>a) the retention of buildings, groups of buildings, existing street patterns of the area, building lines and ground surfaces, and the impact on significant open spaces;</li> <li>b) the retention of architectural details and features of interest that contribute positively to the character or appearance of the area, such as windows, doors and boundary treatments;</li> <li>c) the protection, and where appropriate, the enhancement of key views and vistas, to, from and through a Conservation Area; and</li> </ul> </li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to protect conservation areas. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>d) the protection of trees and landscape that contribute positively towards the character and appearance of the area.</li> <li>3. Development proposals within or which would affect the setting of a Conservation Area are required to be of a high-quality of design and are expected to take the opportunity to enhance the special interest of the area. They are required to reinforce or complement the character and local distinctiveness and the characterisation of the Conservation Area, including having regard to:               <ul style="list-style-type: none"> <li>a) size, height, bulk, massing, scale, layout, landscape and appearance; (and)</li> <li>b) the use of good quality sustainable building materials and detailing, appropriate to the locality and sympathetic in colour, profile and texture; and</li> <li>c) maximising opportunities to mitigate and adapt to climate change through energy efficiency improvements.</li> </ul> </li> </ul>	
<p>Policy D19: Scheduled monuments</p>	<ul style="list-style-type: none"> <li>4. Development proposals are be required to conserve or enhance those elements which contribute to the significance of a Scheduled Monument including setting, with a presumption in favour of preservation in situ. Where harm to/loss of significance is identified this will be considered against Policy D16(3): Designated Heritage Assets. Development that adversely affects the physical survival, setting or historical or architectural significance will be refused.</li> <li>5. Where development (involving ground disturbance is proposed, on or within the immediate setting) proposals are likely to affect the significance of a Scheduled Monument, including its setting, a preliminary archaeological desk-based assessment will be required as part of the planning application. The assessment must:               <ul style="list-style-type: none"> <li>a) detail the extent, character and condition of the archaeological resource; and</li> <li>b) assess the significance of the archaeological remains and the likely impact of the development on the archaeological remains.</li> </ul> </li> <li>6. In cases where the results of any preliminary archaeological desk-based assessment are inconclusive, or where they produce evidence of significant archaeological remains, an archaeological field examination may also be required.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to protect scheduled monuments. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
<p>Policy D19a: Historic Registered Parks and Gardens</p>	<ul style="list-style-type: none"> <li>1. Development proposals affecting a Registered (Historic) Park and Garden or its wider setting are required to demonstrate that it would:               <ul style="list-style-type: none"> <li>a) cause no unacceptable harm to the asset’s significance, taking into account layout, design, character, setting and appearance of those features, both built and natural, that form part of and contribute to its special interest;</li> <li>b) respect the integrity of the landscape and key views into, through or out of the park or garden, particularly those which are an integral part of the design;</li> <li>c) not lead to the unsympathetic sub-division of the landscape; and</li> <li>d) not prejudice its future restoration.</li> </ul> </li> <li>2. Where harm to/loss of significance is identified this will be considered against Policy D16(3): Designated Heritage Assets.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to protect historic parks and gardens. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
<p>Policy D20: Non-designated heritage assets</p>	<ul style="list-style-type: none"> <li>1. Development proposals affecting Non-designated Heritage Assets and their setting (must) are required to be supported by an evidence-based Statement of Significance. The level of detail provided within the statement is expected to be 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.</li> </ul>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to</p>



Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<ol style="list-style-type: none"> <li>2. Development proposals (will) are expected to preserve or enhance the significance of Non-designated Heritage Assets, with an expectation that development proposals:                             <ol style="list-style-type: none"> <li>a) respond to and respect the special architectural and historical interest of the heritage asset and its local importance; and</li> <li>b) are designed and sited so as to conserve the asset, any features of interest and its setting.</li> </ol> </li> <li>3. Development proposals which result in harm to, or loss of the significance of a Non-designated Heritage Asset, or their contribution to the character of a place will be considered in line with national policy and guidance.</li> <li>4. Non-designated Heritage Assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments will be considered against Policy D16: Designated Heritage Assets and Policy D19: Scheduled Monuments.</li> <li>5. An archaeological desk-based assessment, and where appropriate a field evaluation, will be required to inform the determination of development proposals for:                             <ol style="list-style-type: none"> <li>a) sites which affect, or have the potential to affect, County Sites of Archaeological Importance and Areas of High Archaeological Potential; and</li> <li>b) all other development sites exceeding 0.4ha.</li> </ol> </li> <li>6. Where archaeological remains of significance are found to exist, applicants are expected to demonstrate that the particular archaeological interest of the site can be justifiably preserved in situ. Alternatively, where permanent preservation is not justified the remains are to be investigated, recorded and subsequently published and archived in an appropriate repository by an archaeological organisation or consultant in line with accepted national professional standards.</li> </ol>	<p>protect non-designated heritage assets. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
<p>Policy D21: Enabling development and heritage assets</p>	<ol style="list-style-type: none"> <li>1. Development proposals for enabling development that would otherwise conflict with other planning policies, but which would secure the future conservation of a heritage asset are required to demonstrate that:                             <ol style="list-style-type: none"> <li>a) The enabling development would not materially harm the significance of the heritage asset or its setting and is the minimum necessary required to address the 'conservation deficit';</li> <li>b) The enabling development is necessary to solve the conservation needs of the asset or place and not the financial needs of the present owner or to compensate for the price paid for the asset or site;</li> <li>c) There are no alternative means of delivering the same outcome for the heritage asset, and that a full range of realistic possible options has been explored; and</li> <li>d) It meets the guidance set out in the Historic England Guidance document, Enabling Development and Heritage Asset: Historic Environment Good Practice Advice in Planning Note 4 (or guidance superseding it).</li> </ol> </li> <li>2. Development proposals are required to be accompanied by a conservation management plan which identifies the scale and cost of the current repair and maintenance requirements of the heritage asset.</li> <li>3. Development proposals are required to demonstrate that the resultant benefits of the enabling development outweigh the disbenefits. Applications which fail to demonstrate this will be refused.</li> <li>4. Development proposals are required to undertake necessary repairs and maintenance of the heritage asset to secure its future conservation prior to the completion of the enabling development. This will be secured by planning condition or legal agreement.</li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to enable development and heritage assets. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision																				
Policy ID5: Protecting Open Space	<p>1. Open space will be protected in line with LPSS Policy ID4: Green and Blue Infrastructure and national policy. Exceedance of the minimum standards set out in the Open Space, Sport and Recreation Assessment will not mean that land designated as Open Space is surplus to requirements. A surplus will only be considered to exist where an analysis has shown that:</p> <ul style="list-style-type: none"> <li>a) the land is no longer needed as open space, and its loss would not result in, or worsen, a local deficit of that particular open space typology in terms of accessibility, quality or quantity; and</li> <li>b) the site cannot be improved or repurposed to correct deficits in other open space typologies.</li> </ul> <p>2. Development proposals on open space are required to achieve biodiversity net gains in line with Policy P6/P7: Biodiversity in New Developments.</p> <p>3. Development proposals for ancillary uses that support the open space’s role and function will be supported.</p>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to protect open spaces. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>																				
Policy ID6: Open space in new developments	<p><b>Residential development</b></p> <p>1. Development proposals that would result in a net increase in number of residential units are required to provide or fund open space based on the expected occupancy of the new development and the quantity standards set out in Table ID6a. New open space is expected to meet the access standards in Table ID6a.</p> <p><b>Table ID6a</b></p> <table border="1" data-bbox="425 805 1500 1300"> <thead> <tr> <th>Typology</th> <th>Quantity standards (ha/1,000 people)</th> <th>Access standard (expected maximum distance from new homes)</th> </tr> </thead> <tbody> <tr> <td>Allotments</td> <td>0.25</td> <td>720 metres or 15 minutes’ walk time</td> </tr> <tr> <td>Amenity Green Space</td> <td rowspan="2">1 (total)</td> <td>720 metres or 15 minutes’ walk time</td> </tr> <tr> <td>Natural Green Space</td> <td>ANGSt standard</td> </tr> <tr> <td>Parks &amp; Recreation Grounds, including playing pitches</td> <td>1.35 of which a minimum of 0.8 is public space</td> <td>720 metres or 15 minutes’ walk time (except playing pitches)</td> </tr> <tr> <td>Play Space (Children)</td> <td>0.05</td> <td>480 metres or 10 minutes’ walk time</td> </tr> <tr> <td>Play Space (Youth)</td> <td>0.03</td> <td>720 metres or 15 minutes’ walk time</td> </tr> </tbody> </table> <p>2. Development proposals that meet the thresholds in Table ID6b are expected to provide open space on-site unless it can be clearly shown not to be feasible. Where the size of a scheme falls below any of the onsite thresholds, an equivalent financial contribution in lieu will be sought for offsite provision and/or enhancement of existing open space</p>	Typology	Quantity standards (ha/1,000 people)	Access standard (expected maximum distance from new homes)	Allotments	0.25	720 metres or 15 minutes’ walk time	Amenity Green Space	1 (total)	720 metres or 15 minutes’ walk time	Natural Green Space	ANGSt standard	Parks & Recreation Grounds, including playing pitches	1.35 of which a minimum of 0.8 is public space	720 metres or 15 minutes’ walk time (except playing pitches)	Play Space (Children)	0.05	480 metres or 10 minutes’ walk time	Play Space (Youth)	0.03	720 metres or 15 minutes’ walk time	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to provide open spaces in new developments. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
Typology	Quantity standards (ha/1,000 people)	Access standard (expected maximum distance from new homes)																				
Allotments	0.25	720 metres or 15 minutes’ walk time																				
Amenity Green Space	1 (total)	720 metres or 15 minutes’ walk time																				
Natural Green Space		ANGSt standard																				
Parks & Recreation Grounds, including playing pitches	1.35 of which a minimum of 0.8 is public space	720 metres or 15 minutes’ walk time (except playing pitches)																				
Play Space (Children)	0.05	480 metres or 10 minutes’ walk time																				
Play Space (Youth)	0.03	720 metres or 15 minutes’ walk time																				

**Policy Number**      **Policy Description**

**Likely Significant Effects Screening Decision**

of that typology. This includes proposals of 1-10 dwellings, which are required to provide financial contributions for all of the open space typologies in the table.

- Where required onsite open space provision is unable to meet the quantity standards in Table ID6a, an equivalent financial contribution based on the amount and type of open space omitted will be sought as above.

**Table ID6b**

Open space typology	11-49 dwellings	50-249 dwellings	250+ dwellings	Strategic sites (In LPSS)
Amenity/Nat. Green Space	✓	✓	✓	✓
Parks & Rec. Grounds	-	-	✓	✓
Play Space (children)	-	✓	✓	✓
Play Space (Youth)	-	-	✓	✓
Allotments	-	-	-	✓

**Key**

✓ On-site provision

- The standard for parks and recreation grounds in Table ID6a includes an allowance for playing pitches. (Contributions towards private sport provision will be acceptable where there is clear public benefit.) Where artificial grass pitches (AGP) are proposed in place of natural grass pitches, this should be supported by clear evidence that it is required to be justified by evidence of local need for this type of pitch.
- Both artificial and grass pitches are required to be designed to a high standard and applicants are required (should be able) to demonstrate by means of a community use agreement that any privately owned pitch they will be accessible to the public and that any charges for their use will be affordable. Contributions towards private sport provision will be acceptable where there is clear public benefit.
- New residential development proposals are expected to consider provision of community growing space in addition to other types of open space. (Provision will be expected on denser developments where residents will have limited access to private gardens.)
- Deviations from the mix of open space typologies set out in this policy may be permitted where deficiencies in provision in the local area of the site are corrected and the (full) required provision of open space in terms of total quantity is still provided.


**Non-residential developments**

- Non-residential developments will be encouraged to provide areas of amenity open space of a proportionate size, scale and character within or adjacent to the development.

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<p><b>Quality and design of new open space</b></p> <p>9. New open spaces are required to meet the Council's minimum standards for site size, design and quality as set out in its most recently published strategies.</p> <p>10. New open spaces are expected to:</p> <ul style="list-style-type: none"> <li>a) be multi-functional spaces that deliver a range of benefits including biodiversity gains, flood risk management and climate change measures;</li> <li>b) be safe and secure for all members of the community and their design and management should promote social inclusivity</li> <li>c) (Open spaces are expected to) support and enhance the existing rights of way network, providing new footpaths and cycle links where possible; and</li> <li>d) be designed to link up open spaces as much as possible.</li> </ul>	
<p>Policy ID8: Community facilities</p>	<ul style="list-style-type: none"> <li>1. Development proposals for new, expanded or replacement community facilities are required to: <ul style="list-style-type: none"> <li>a) be appropriate in design terms;</li> <li>b) avoid an unacceptable impact on the amenity of neighbouring residents; and</li> <li>c) avoid unacceptable transport impacts.</li> </ul> </li> <li>2. Development proposals for new, expanded or replacement community facilities are: <ul style="list-style-type: none"> <li>a) expected to be located and designed so that they can be conveniently accessed by their intended users via public transport, walking and cycling; and</li> <li>b) encouraged to be co-located with compatible and mutually supportive facilities or uses.</li> </ul> </li> <li>3. Complementary or ancillary uses, closely associated with or as part of a community facility are encouraged, provided that they do not detract from the facility and its primary function.</li> <li>4. Development proposals for new Local Centres or community hubs are encouraged to be designed to be flexible and adaptable to accommodate changing needs and modern lifestyles.</li> <li>5. Community facilities will be retained for the benefit of the community and development proposals resulting in their loss or change of use resisted unless it is demonstrated that: <ul style="list-style-type: none"> <li>a) adequate alternate provision exists or a replacement facility of an equivalent or better standard is to be provided in a location equally or more conveniently accessible to the facility's current catchment area; or</li> <li>b) there is no longer a need for the facility in its existing or alternative community use and its retention for such uses has been fully explored without success.</li> </ul> </li> </ul>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to enable access to community facilities. Any proposals would be subject to the provisions of Policy P5 in adopted LPP1 which states that <i>'Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development'</i>.</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
Policy ID9: Retention of Public Houses	<ol style="list-style-type: none"> <li>1. Development proposals resulting in the loss or partial loss of a public house will be resisted unless the existing use is unviable and its retention has been fully explored. Evidence is required to be provided that the building has been marketed actively and comprehensively as a public house and alternative community facility for a continuous period of at least 18 months, ending close to or immediately prior to submission of the planning application.</li> <li>2. In addition, for development proposals involving the loss or partial loss of a public house outside the boundary of Guildford town centre, applicants will also be required to undertake and provide details of:               <ol style="list-style-type: none"> <li>a) a comprehensive evaluation of the public house’s continued viability, with detailed consideration of its existing and potential trade; and</li> <li>b) an assessment of alternative public houses within reasonable walking distance of residential properties within the catchment area of the public house that is the subject of the application.</li> </ol> </li> <li>3. The loss of part of a public house, including car parking or other facilities complementary to its operation as a public house, will be resisted where it would adversely affect such operation.</li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to resist applications for redevelopment of public houses. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
Policy ID10: Achieving a comprehensive Guildford borough cycle network	<ol style="list-style-type: none"> <li>1. The routes and infrastructure which comprise the Comprehensive Guildford borough Cycle Network including the cycle elements of the Sustainable Movement Corridor, as represented on the Policies Map, will be the basis and starting point for identification of improvements, primarily for utility cycling, provided and/or funded by new development.</li> <li>2. Development proposals are also required to deliver the site-specific requirements for cycle infrastructure as identified in site allocation policies and also any further requirements identified as part of the planning application process.</li> <li>3. The mechanisms for improvements resulting from new development are:               <ol style="list-style-type: none"> <li>a) constructing or improving cycle routes and infrastructure on land within the applicant’s control;</li> <li>b) providing under licence and/or funding the Local Highway Authority to deliver the cycle routes and infrastructure on the public highway or land in their control.</li> </ol> </li> <li>4. Cycle routes and infrastructure are required to be designed and adhere to the principles and quality criteria contained within the latest national guidance.</li> <li>5. Development proposals are expected to have regard to updated plans prepared by Guildford Borough Council and/or Surrey County Council which detail local cycling infrastructure improvements, such as a Local Cycling and Walking Infrastructure Plan.</li> <li>6. For consultation purposes, the mapped routes which comprise the ‘Comprehensive Guildford Borough Cycle Network’ can be found in Appendix A.</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to achieve a comprehensive cycle network. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
Policy ID11: Parking standards	<ol style="list-style-type: none"> <li>1. The parking standards in adopted Neighbourhood Plans, irrespective of when these were adopted, will take precedence over standards set by the Local Planning Authority in the Local Plan and Supplementary Planning Documents, should there be conflict, except in relation to strategic sites.</li> <li>2. For strategic sites:               <ol style="list-style-type: none"> <li>a) the provision of residential car parking, for use by residents themselves, will not exceed the maximum standards set out in Table A1 B1;</li> </ol> </li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy for parking within the borough. It does not provide for a quantum of development or identify any locations for development</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<p>b) provision of additional unallocated parking, to allow for visitors, deliveries and servicing, at the ratio of 0.2 spaces per dwelling will only be required where 50% or more of the total number of spaces, provided for use by residents themselves, are allocated;</p> <p>c) the provision of non-residential car parking will not exceed the maximum standards set out in Table A2 B2;</p> <p>d) the provision of electric vehicle charging will provide at least the minimum requirements set out in Table A3 B3; and</p> <p>e) the provision of cycle parking will provide at least the minimum requirements set out in Table A4 B4.</p> <p>Tables A1- A4 B1-B4 can be found in Appendix A B.</p> <p>3. For non-strategic sites:</p> <p>a) the provision of car parking in new residential developments in Guildford town centre or suburban areas, for use by residents themselves, will not exceed the maximum standards set out in the Parking SPD;</p> <p>b) the provision of car parking in new residential developments in village and rural areas, for use by residents themselves, should meet the expected standards set out in the Parking SPD;</p> <p>c) provision of additional unallocated parking, to allow for visitors, deliveries and servicing, at the ratio of 0.2 spaces per dwelling will only be required where 50% or more of the total number of spaces, provided for use by residents themselves, are allocated;</p> <p>d) the provision of non-residential car parking will not exceed the maximum standards set out in the Parking SPD;</p> <p>e) the provision of electric vehicle charging will provide at least the minimum requirements set out in the Parking SPD; and</p> <p>f) the provision of cycle parking will provide at least the minimum requirements set out in the Parking SPD.</p> <p>4. For residential and non-residential development on strategic sites and also non-strategic sites in urban areas:</p> <p>a) the provision of car and motorised vehicle parking at lower than the defined maximum standards must be justified by a coherent package of sustainable transport measures which will be proportionate to the level of reduction sought. Evidence will be expected to address:</p> <ul style="list-style-type: none"> <li>i. generous provision of unallocated car parking as a proportion of all car parking spaces provided by the development proposals scheme, where this enables more efficient use of land;</li> <li>ii. excellent quality of walking and cycling access to a local centre, district centre or Guildford town centre;</li> <li>iii. high public transport accessibility; and</li> <li>iv. planning obligations and/or on-street parking controls 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.</li> </ul> <p>b) the provision of car-free development must be justified by a coherent package of sustainable transport measures. Evidence will be required to demonstrate:</p>	<p>No linking impact pathways</p>

Policy Number	Policy Description	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"><li>i. excellent quality of walking and cycling access to a district centre or Guildford town centre;</li><li>ii. high public transport accessibility;</li><li>iii. access to a car club for residents and/or users;</li><li>iv. that the car-free status of the development can be enforced by planning obligations and/or on-street parking controls;</li><li>v. appropriate incentivisation of these measures; and</li><li>vi. appropriate monitoring of these measures.</li></ul> <p>5. For all sites:</p> <ul style="list-style-type: none"><li>a) car parking spaces external to a dwelling will be required to meet the minimum size requirements of 5 by 2.5 metres;</li><li>b) a garage will only count as providing a car parking space if it meets the minimum internal dimensions of 6 by 3 metres. A garage with the minimum internal dimensions of 7 by 3.3 metres will be considered to also have the capacity to park up to 2 cycles, allowing independent access. A garage with the minimum internal dimensions of 7 by 4 metres will be considered to have the capacity to park up to 5 cycles, allowing independent access. Alternate layouts for garages which can be demonstrated to provide equivalent or better space provision and access for a vehicle and cycles may be acceptable;</li><li>c) car parking spaces for disabled drivers will be designed and provided in accordance with national guidance;</li><li>d) development proposals will be required to demonstrate that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users.</li></ul>	

## 5. In-combination Assessment

- 5.1 The Guildford LPDMP must be looked at in-combination with other plans and projects within 5km of the Thames Basin Heaths SPA. The plans and projects looked at within the in-combination assessment are listed in paragraph 2.23.
- 5.2 The location of the Thames Basin Heaths SPA has resulted in the area being subject to high development pressure. Which can increase recreational pressure and urbanisation within the SPA.
- 5.3 In 2005, a visitor assessment of the Thames Basin Heaths SPA<sup>25</sup> determined that the majority of visitors travel by car and drive relatively short distances (less than 5km). This helped determine that any new residential development within 5km of the SPA could result in likely significant effects upon the SPA. This has been reaffirmed by subsequent surveys.
- 5.4 Therefore, although a borough's contribution may only be small alone it must be looked at as an accumulation of small effects with other boroughs within the 5km boundary in which it is thought LSE may occur. Development across all boroughs within 5km of the boundary of the SPA could therefore have a large adverse effect upon the SPA with regards to recreational pressure and urbanisation.
- 5.5 English Nature (now Natural England) published a Draft Delivery Plan for the Thames Basin Heaths SPA in May 2006, partly in response to the European Court of Justice ruling of October 2005. This is updated by the 'Thames Basin Heaths Special Protection Delivery Framework' published by the Thames Basin Heaths Joint Strategic Partnership Board in January 2009.
- 5.6 These documents aim to allow a strategic approach to accommodating development by providing a method through which local authorities can meet the requirements of the Habitats Regulations through avoidance and mitigation measures.
- 5.7 In addition, Guildford Borough Council has produced a Thames Basin Heaths Avoidance Strategy (2017), which has identified that between 400m and 5km of the SPA boundary, development will only be possible if it can demonstrate adequate avoidance or mitigation of significant adverse effects through recreational pressure.
- 5.8 The HRA of the adopted LPP1 concluded there would be no adverse effects on the integrity of the SPA either alone or in combination and Policy P5 enables the necessary mitigation measures to be delivered. As LPDMP presents no impact pathways to Habitats sites, it can therefore be concluded no in-combination effects will arise from the LPDMP.

## 6. Conclusions

- 6.1 The policies within the Guildford LPDMP are development management policies which set conditions within which developments must comply to ensure the protection of aspects of the Borough such as green space, conservation areas and heritage assets, as well as setting parameters for design of aspects of development including parking, housing density and alterations to current housing stock. No policies within the LPDMP allocate a quantum of residential or business development or determine its location. All development in Guildford will be governed in part by Policy P5 of LPP1, which specifically sets out the criteria for protecting the Thames Basin Heaths SPA. That policy therefore forms part of the context for LPDMP.

---

<sup>25</sup> Liley, D, Jackson, D. & Underhill-Day, J. (2005). Visitor Access Patterns on the Thames Basin Heaths. English Nature Research Report 682. English Nature, Peterborough



- 6.2 No policies were assessed to have a likely significant effect upon the Thames Basin Heath SPA either alone or in combination with other plans or projects. All policies have been screened out as having no linking impact pathways to the Habitats site.
- 6.3 Therefore, it can be concluded that there would be no likely significant effect on the SPA either alone or in-combination from the LPDMP.

# Appendix A Habitats Site Background

## Thames Basin Heaths SPA

### Introduction

- 7.1 Thames Basin Heaths consists of a number of fragments of lowland heathland scattered across Surrey, Hampshire and Berkshire. It is predominantly dry and wet heath but also includes area of deciduous woodland, gorse scrub, acid grassland and mire, as well as associated conifer plantations. Around 75% of the SPA has open public access being either common land or designated as open country under the Countryside and Rights of Way Act 2000. The SPA consists of 13 Sites of Special Scientific Interest (SSSI). Three of the SSSIs are also designated as part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC).
- 7.2 Ash to Brookwood Heaths SSSI, Whitmoor Common SSSI, Colony Bog and Bagshot Heaths SSSI and Ockham and Wisley Commons SSSI lie within or partly within Guildford Borough.
- 7.3 The location of the Thames Basin Heaths has resulted in the area being subject to high development pressure. English Nature (now Natural England) published a Draft Delivery Plan for the Thames Basin Heaths SPA in May 2006, partly in response to the European Court of Justice ruling of October 2005. This is updated by the 'Thames Basin Heaths Special Protection Delivery Framework' published by the Thames Basin Heaths Joint Strategic Partnership Board in January 2009. These documents aim to allow a strategic approach to accommodating development by providing a method through which local authorities can meet the requirements of the Habitats Regulations through avoidance and mitigation measures.
- 7.4 In addition, Guildford Borough Council has produced a Thames Basin Heaths Avoidance Strategy (2017), which has identified that between 400m and 5km of the SPA boundary, development will only be possible if it can demonstrate adequate avoidance or mitigation of significant adverse effects through recreational pressure.

### Features of international interest<sup>26</sup>

- 7.5 Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:
- 7.6 During the breeding season:
- Nightjar *Caprimulgus europaeus*: 7.8% of the breeding population in Great Britain (count mean, 1998-1999);
  - Woodlark *Lullula arborea*: 9.9% of the breeding population in Great Britain (count as at 1997);
  - Dartford warbler *Sylvia undata*: 27.8% of the breeding population in Great Britain (count as at 1999).
- 7.7 These species nest on or near the ground and as a result are susceptible to predation and disturbance.

### Conservation objectives

- 7.8 The Conservation Objectives for the international interests on the SPA are, subject to natural changes:

---

<sup>26</sup> Features of international interest are the features for which a Habitats site is selected. They include habitats listed on Annex 1 of the Habitats Directive, species listed on Annex II of the EC Habitats Directive and populations of bird species for which a site is designated under the EC Birds Directive.

- to maintain<sup>27</sup>, in favourable condition, the habitats for the populations of Annex 1 bird species+ of European importance, with particular reference to: lowland heathland and rotationally managed plantation.

## Key environmental conditions

7.9 The key environmental conditions that support the features of international interest have been defined as:

- Appropriate management.
- Management of disturbance during breeding season (March to July).
- Minimal air pollution.
- Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species.
- Maintenance of appropriate water levels.
- Maintenance of water quality.

## Thursley, Ash, Pirbright & Chobham SAC

### Introduction

7.10 The Thames Basin Heaths SPA partly overlaps other international sites, namely SAC components entirely contained within this SPA area.

7.11 These commons together incorporate a heath and valley mire complex. Thursley Common is a National Nature Reserve managed by Natural England and Frensham and Witley Commons are managed by the National Trust. A large part of the site is owned by the MoD (Hankley Common and Ockley Common), being regularly used for military activities and informal recreation. All components of this SPA lie within Waverley Borough.

7.12 This extensive site represents some of the finest remaining heathland on the Lower Greensand in Southern England. The valley mire on Thursley Common is regarded as one of the best in Britain. The site is of national importance for its bird, reptile and invertebrate populations.

7.13 Hankley Common has the most extensive tracts of dry heath, but the habitat is also well represented on the other Commons. Peatland is of greatest value on Thursley Common, but on the other commons is less extensive but still important. The site is one of the richest for birds in Southern England. Breeding birds specifically associated with the heathland include woodlark, Dartford warbler, and nightjar.

### Features of Interest

7.14 Thursley, Ash, Pirbright and Chobham **SAC** is designated for three Annex I habitats<sup>28</sup>.

7.15 The qualifying Annex 1 habitats are:

- Wet heathland with cross-leaved heath
- Dry heaths
- Depressions on peat substrates

---

<sup>27</sup> Maintenance implies restoration if the feature is not currently in favourable condition.

+ Nightjar, woodlark and Dartford warbler.

<sup>28</sup> <http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012793.pdf> [accessed 14/10/2020]

## Conservation Objectives

### Thursley, Ash, Pirbright and Chobham SAC<sup>29</sup>

7.16 *'With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;*

*Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;*

- *The extent and distribution of qualifying natural habitats*
- *The structure and function (including typical species) of qualifying natural habitats, and*
- *The supporting processes on which qualifying natural habitats rely'*

## Key Environmental Conditions

7.17 The key environmental conditions that support the features of international interest have been defined as:

- Appropriate management
- Managed recreational pressure
- Minimal air pollution
- Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species
- Maintenance of appropriate water levels
- Maintenance of water quality
- Management of disturbance during breeding season (March to July) (SPA and Ramsar sites)

---

<sup>29</sup> <http://publications.naturalengland.org.uk/file/6293604645470208> [accessed 01/12/2017]

