

## Appendix 2: Review of LPSS policies against NPPF/NPPG

The information contained in the following table is intended to indicate the extent to which the LPSS policies continue to be in line with current policy, guidance and planning legislation, and therefore the weight that may continue to be given to them in determining planning applications. They do not attempt to assess the extent to which they may require updating or what evidence base is likely to be necessary to understand how they may be updated. Significant reforms to the plan-making system are being brought in that will facilitate the creation of 'new style' local plans. This is anticipated to be implemented in Autumn 2024. Given the uncertainty regarding the scope and content of new style local plans, it is not considered possible at this time to undertake this level of analysis. Instead, this exercise will be undertaken once these reforms are in place and the Council is in a position to begin to the update to the LPSS/create a new style local plan.

<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
<b>Chapter 4.1: Strategic Policies</b>	Left blank	Left blank
Policy S1: Presumption in favour of sustainable development	The Policy is consistent with the NPPF in particular paragraph 11 which states that plans and decisions should apply a presumption in favour of sustainable development.	

<p>Policy S2: Planning for the borough - our spatial development strategy</p>	<p>Paragraph (1) of Policy S2 includes a housing requirement of 562 dwelling per annum across the plan period (2015 – 2034). In accordance with NPPF paragraph 77, Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their local housing need where the strategic policies are more than five years old. Local housing need is calculated using the standard method. For Guildford this figure is currently 771 dwellings per annum.</p> <p>Paragraph (2) of Policy S2 is consistent with Section 6 of the NPPF by identifying sites for local and inward investment from businesses to meet anticipated needs over the plan period, and with paragraph 90, which states that planning policies should “...allocate a range of suitable sites in town centres [for retail and other main town centre uses] to meet the scale and type of development needed, looking at least ten years ahead”. The evidence base informing the retail floorspace targets in paragraph (2) was partly updated in 2022, in</p>	<p>A partial update to the Council’s 2015 Retail and Leisure Study and 2017 Addendum, focused on need for comparison retail and food and drink uses in the town centre, was undertaken in 2022 in support of a mixed-use planning application (ref 23/P/01211) for the North Street site (LPSS site allocation A5), and reviewed in a Retail Planning Appraisal by Lambert Smith Hampton, commissioned by the Council. This highlighted significantly reduced need for floorspace for retail, and food and drink uses across the town centre.</p>
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LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>respect of need for comparison retail floorspace in the town centre.</p> <p>Paragraph (3) of Policy S2 is consistent with the NPPF and PPTS. However, the definition of a gypsy and traveller has changed. This will need to be considered in future when setting the pitch target for gypsies and travellers (as defined in PPTS Annex 1) which address the likely permanent and transit site accommodation needs of travellers in our area (see PPTS paragraph 9). The LPSS has however taken into account and sought to meet the needs of formerly non-PPTS travellers through its site allocations.</p>	<p>On 19 December 2023 the Government issued an update to PPTS Annex 1 glossary which amends the definition of a gypsy or traveller to now include those that have ceased to travel permanently. The Government intends to review the approach to this area of policy and case law in 2024.</p>

<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
Policy S3: Delivery of development and regeneration within Guildford Town Centre	The Policy is consistent with the NPPF including the expectation that planning policies promote the long-term vitality and viability of town centres and encourage residential development on appropriate sites (see NPPF paragraphs 86a and f)	
<b>Chapter 4.2: Housing Policies</b>	Left blank	Left blank
Policy H1: Homes for all	The Policy is consistent with the NPPF including the expectation that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people including those who require retirement housing, housing with care and care homes, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes) (see NPPF paragraph 63)	<p>H1 (3) Ministry of Housing, Communities and Local Government is now called Department for Levelling Up, Housing and Communities</p> <p>Paragraphs 4.2.20 and 4.2.21 in the reasoned justification will need revising in light of the Government update to PPTS Annex 1 glossary which amends the definition of a gypsy or traveller to now include those that have ceased to travel permanently.</p>

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
Policy H2: Affordable homes	<p>The policy is consistent with the NPPF, including Paragraph 64 which states that planning policies should specify the type of affordable housing required where need is identified and that this should be provided on-site unless off-site provision or appropriate financial contribution in lieu can be robustly justified.</p> <p>The requirement in paragraph (4) for a minimum 70% of Section 106 affordable housing contributions to be affordable rent does not conflict with the expectation in the NPPG for a minimum 25% of affordable housing contributions to be First Homes, as this minimum 25% is met within the remaining 30% which paragraph (4) states must be 'other forms of affordable housing'.</p> <p>Paragraph 65 of the NPPF sets a 10-dwelling threshold below which affordable housing provision should not be sought outside of designated rural areas. The threshold for these</p>	

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	sites in Policy H2 is 11 or more dwellings, however a higher threshold does not conflict with national policy.	
Policy H3: Rural exception homes	<p>The policy is consistent with the NPPF, which states that planning policies should support housing developments that reflect local needs, including rural exception sites, and allow an element of market housing on these sites for viability purposes (paragraph 82).</p> <p>It is also consistent with the NPPG, which encourages local authorities to produce policies specifying the proportion of market housing considered acceptable on rural exception sites, and under what circumstances.</p>	
<b>Chapter 4.3 Protecting Policies</b>	Left blank	Left blank
Policy P1: Surrey Hills Area of	The Policy is consistent with the NPPF which seeks to conserve and enhance the landscape	The Surrey Hills AONB has been officially renamed as the Surrey Hills National Landscape.

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
Outstanding Natural Beauty	and scenic beauty in AONBs (see NPPF paragraphs 182 and 183)	<p>Natural England is currently undertaking a review of the AONB boundary however this is still at a relatively early stage. Greater weight will be able to be given to candidate AONB areas as the certainty regarding the proposals increases. Policy P1 will apply to these areas once they designated as AONB by Natural England.</p> <p>The 'Key Evidence' box refers to the Surrey Hills Area of Outstanding Natural Beauty Management Plan 2014-2019. This has been replaced by the Management Plan 2020 – 2025.</p>
Policy P2: Green Belt	The Policy is consistent with the NPPF which set out the exceptions which are not considered inappropriate development (see NPPF paragraphs 154 and 155)	
Policy P3: Countryside	The Policy is consistent with the NPPF which seeks to contribute to and enhance the natural and local environment by recognising the	

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	intrinsic character and beauty of the countryside (see NPPF paragraph 180)	
Policy P4: Flooding, flood risk and groundwater protection zones	<p>The policy is consistent with the NPPF, which states that development should be directed away from areas at highest risk of flooding and that, where development in these areas is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere. .</p> <p>The NPPF now expects planning policies to protect and <u>improve</u> water quality. Paragraph (6) of the policy is consistent with this through its protection for Groundwater Source Protection Zones and Principal Aquifers.</p> <p>The PPG now has guidance on water quality that reflects the Water Environment Regulations (WER). The WER replace the Water Framework Directive (WFD) so supporting text references in the policy to the WFD are out of date.</p>	<p>LPDMP Policy P10 (9) extends protection to surface Source Protection Zones and all Drinking Water Protected Areas in accordance with the designations on Defra’s Magic Map and EA position statements.</p> <p>Protection, enhancement and restoration of some waterbodies against specified targets are now required by the WER.</p>

<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
Policy P5: Thames Basin Heaths Special Protection Area	<p>The policy is consistent with the NPPF though some terminology has changed.</p> <p>Policy P5 protects the Thames Basin Heaths Special Protection Area. The content is compliant with the NPPF.</p> <p>The policy refers to “European Sites” in accordance with the NPPF 2012. However, the NPPF 2021 replaces this with “habitats sites”. Special Protection Areas receive the same protection as before. The NPPF replaces references to the Habitats Directive with references to the Conservation of Habitats and Species Regulations 2017.</p>	The evidence box refers to “The Conservation of Habitats and Species Regulations 2010” rather than the current version dated 2017. The 2017 update consolidated amendments but did not alter the legal context.
<b>Chapter 4.4 Economy Policies</b>	Left blank	Left blank
Policy E1: Meeting employment and retail needs	Policy E1 is consistent with the NPPF, Section 6 of which indicates that planning policies should proactively support economic growth and productivity, taking account of local business needs and wider development opportunities, and identify strategic sites for local and inward	The references in paragraphs (1) and (2) to Class A (and B1a, B1b and B1c uses are no longer correct as these uses were replaced in the Use Classes Order (UCO) in September 2020 by Class E and sui generis uses. However, the description of

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	investment to meet anticipated needs over the plan period.	<p>the uses for which land allocated by the LPSS is designated (office, research &amp; development, industrial, retail, and food and drink) remain the same in the amended UCO and are referenced in the list of uses in LPSS Appendix 2: Glossary. The policy references therefore continue to be for these uses, regardless of the change to their use class.</p> <p>A partial update to the Council's 2015 Retail and Leisure Study and 2017 Addendum, focused on need for comparison retail and food and drink uses in the town centre, was undertaken in 2022 in support of a mixed-use planning application (ref 23/P/01211) for the North Street site (LPSS site allocation A5), and reviewed in a Retail Planning Appraisal by Lambert Smith Hampton, commissioned by the Council. This highlighted significantly reduced need</p>

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		for floorspace for retail and food and drink uses across the town centre.
Policy E2: Location for new employment floorspace	The policy is consistent with the NPPF, Section 6 of which indicates that planning policies should proactively support economic growth and productivity, taking account of local business needs and wider development opportunities. Paragraphs (2) and (6) offer flexibly worded support for economic development proposals which accord with the NPPF requirement for policies to be sufficiently flexible to accommodate needs not anticipated in the Plan and to adapt to changes in economic circumstances.	The references in paragraph (3) to Use Classes B1a and B1b and in paragraph (7) to Use Class B1c are no longer correct as these uses were replaced by Use Classes E (g) (i), (ii) and (iii) respectively in the Use Classes Order amended September 2020. However, the description of these uses is unchanged in the amended Use Classes Order and is referenced in LPSS Appendix 2: Glossary, so the policy references therefore continue to be for these uses, regardless of the change to their use class.

<p>Policy E3: Maintaining employment capacity and improving employment floorspace</p>	<p>The policy is consistent with the NPPF, paragraph 86 of which states that planning policies should ‘identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period’. The sites that the policy designates for protection against redevelopment or change of use to non-employment uses accord with NPPF paragraph 87 by allowing clustering of industries and through their varied scale and suitably accessible locations.</p> <p>Neither the NPPF or NPPG specify an appropriate period for marketing employment sites and uses; however, the sliding scale in Policy E3 is still considered appropriate and the time periods sufficient to test the market and to allow for changes in market conditions.</p>	<p>The references in the policy and paragraph 4.4.34 to Use Classes B1a, B1b and B1c are no longer correct as these uses were replaced by Use Classes E(g)(i), (ii) and (iii) respectively in the Use Classes Order as amended September 2020. However, the description of these uses is the same in the amended Use Classes Order and is referenced in LPSS Appendix 2: Glossary, so the policy references continue to be for these uses, regardless of the change to their use class.</p> <p>The part of the Woodbridge Meadows Strategic Employment Site (Policy E3, para (4)(f)) to the south of the railway line may no longer be a suitable strategic location for industrial uses, since current employment premises there are offices and research and development uses, and there are also a number of recently developed residential/student accommodation uses within this part of the designated boundary with which any</p>
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LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
		future industrial uses would likely conflict.
Policy E4: Surrey Research Park	Policy E4 is consistent with the NPPF, Section 6 of which indicates that planning policies should proactively support economic growth and productivity, taking account of local business needs and wider development opportunities. Paragraph (4) is consistent with the requirements of Section 12 and paragraph 135 of the NPPF which indicate that development sites should be visually attractive and sympathetic to existing local character.	
Policy E5: Rural economy	The policy is consistent with NPPF para 88 which states that planning policies should enable the sustainable growth and expansion of all types of business in rural areas, through conversion of existing buildings and well-designed new buildings; support the development and diversification of agricultural and other land-based rural (including tourism and leisure) businesses; and support the retention and	The reference in paragraph (5) to Use Class A1 is no longer correct as the uses previously in this Use Class were split up in the Use Classes Order amended September 2020 into Class E(a), (b) and (c). Whilst Use Class A1 no longer exists the policy makes it clear that it is seeking to protect shops and services that provide for everyday needs in rural areas

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	<p>development of accessible local services and community facilities.</p> <p>The reference at paragraph (4) to the sequential test for main town centre uses not being applicable to small scale rural development is consistent with NPPF paragraph 93.</p>	<p>outside of centres. Therefore, the policy references to Use Class A1 continue to be for these shops and services, regardless of the change to their use class.</p>
<p>Policy E6: The leisure and visitor experience</p>	<p>Paragraph (1) (c) is consistent with NPPF paragraph 88 c) which states that “planning policies should enable... sustainable rural tourism and leisure developments which respect the character of the countryside [i.e., rural areas].”</p> <p>The impact assessment for new leisure uses on unallocated land outside of designated centres (referenced in policy paragraph (2)) remains consistent with the NPPF (paragraph 94-95) and NPPG. The locally set threshold of 500 sqm gross floorspace above which an impact assessment is required is proportionate and consistent with NPPF paragraph 94.</p> <p>The protection for existing leisure and visitor attractions in paragraph (3) is consistent with</p>	<p>The protection for existing uses within paragraph (3) has been reduced in scope of application by the introduction of Class E into the Use Classes Order (Sept 2020), however the policy refers to the description of the uses and so these references remain relevant. Paragraphs (2 and (3) of the policy are now applied where planning permission for change of use is still required and may be applied on a case-by-case basis where planning permission is sought for operational reasons only.</p>

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	<p>the requirement of NPPF paragraph 88 d) that planning policies should enable “the retention... of accessible local services and community facilities, such as ...sports venues, open space [and] cultural buildings.”</p>	
<p>Policy E7: Retail and leisure uses in Guildford Town Centre</p>	<p>The policy is consistent with NPPF paragraph 90, which states that planning policies should define a hierarchy of centres and promote their long-term vitality and viability, define the extent of centres and primary shopping areas, and make clear the range of uses permitted in them.</p> <p>The impact assessment for new retail and leisure uses on unallocated land outside of designated centres (referenced in policy paragraph (2)) remains consistent with the NPPF (paragraph 94-95) and NPPG. The locally set threshold of 500 sqm gross floorspace above which an impact assessment is required is</p>	<p>The references to Class A (A1-A5) uses are out of date as these uses were replaced in the Use Classes Order by Class E and sui generis uses (UCO amendment Sept 2020). However, the description of these uses is the same in the amended Use Classes Order and is referenced in LPSS Appendix 2: Glossary, so the policy references continue to be for these uses, regardless of the change to their use class.</p> <p>The policy is applied where planning permission for change of use is still required and may also be applied on a case-by-case basis where planning permission is sought for operational reasons only.</p>

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	<p>proportionate and consistent with NPPF paragraph 94.</p> <p>The sequential test for main town centre uses (paragraph 4.4.88) also remains consistent with the NPPF (paragraphs 91-93) and NPPG.</p>	
Policy E8: District Centres	<p>The policy is consistent with NPPF paragraph 90, which states that planning policies should define a hierarchy of centres and promote their long-term vitality and viability, define the extent of centres, and make clear the range of uses permitted in them.</p> <p>The sequential test for main town centre uses (paragraph 3) remains consistent with the NPPF (paragraphs 91-93) and NPPG.</p> <p>The impact assessment for new retail and leisure uses on unallocated land outside of designated centres (referenced in policy paragraph (4)) also remains consistent with the NPPF (paragraph 94-95) and NPPG. The locally set threshold of 500 sqm gross floorspace above which an impact assessment is required is</p>	<p>The references to Class A (A1-A5) uses are out of date as these uses were replaced in the Use Classes Order by Class E and sui generis uses (UCO amendment Sept 2020). However, the description of these uses is the same in the amended Use Classes Order and is referenced in LPSS Appendix 2: Glossary, so the policy references continue to be for these uses, regardless of the change to their use class.</p> <p>The policy is applied where planning permission for change of use is still required and may also be applied on a case-by-case basis where planning</p>

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	proportionate and consistent with NPPF paragraph 94.	permission is sought for operational reasons only.
Policy E9: Local Centres and isolated retail units	<p>The policy is consistent with NPPF paragraph 90, which states that planning policies should define a hierarchy of centres and promote their long-term vitality and viability, define the extent of centres, and make clear the range of uses permitted in them.</p> <p>NPPF paragraphs 88 d), 96 c) and 97 a) all support the approach in E9 (10) towards retention of essential local shops and services as important community facilities.</p> <p>The sequential test for main town centre uses (paragraph (6)) remains consistent with the NPPF (paragraphs 91-93) and NPPG.</p> <p>The impact assessment for new retail and leisure uses on unallocated land outside of designated centres (referenced in policy paragraph (7)) also remains a requirement of the NPPF (paragraph 94-95) and NPPG. The</p>	<p>The references to Class A (A1-A5) uses are out of date as these uses were replaced in the Use Classes Order by Class E and sui generis uses (UCO amendment Sept 2020). However, the description of these uses is the same in the amended Use Classes Order and is referenced in LPSS Appendix 2: Glossary, so the policy references continue to be for these uses, regardless of the change to their use class.</p> <p>The policy is applied where planning permission for change of use is still required and may also be applied on a case-by-case basis where planning permission is sought for operational reasons only.</p>

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	locally set threshold of 500 sqm gross floorspace above which an impact assessment is required is proportionate and consistent with NPPF paragraph 94.	
<b>Chapter 4.5 Design Policies</b>	Left blank	Left blank
Policy D1: Place shaping	The Policy is consistent with the NPPF which set out the importance of achieving well designed places (see NPPF paragraphs 134 and 135)	

<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
Policy D2: Climate change, sustainable design, construction, and energy	The Policy is consistent with the NPPF (paras 163-165) where the policy sets out ways that new development can reduce the impact on the environment, generally supports energy efficiency and renewable/low carbon energy improvements in existing buildings and encourages resilience to the impacts of climate change.	Climate change is now an inherent part of the NPPF and is present in sections such as design and open space. The importance attributed to climate change has significantly increased since the LPSS was adopted, LPDMP Policies D14-17 respond to this by further strengthening the Council's climate change policies. LPSS Policy D2 Criteria (5), (6), (7) and (9) and have been superseded by LPDMP Policy D16 Criteria (1), (2), (3) and (4), respectively. This was to reflect changes to Building Regulations and national policy.
Policy D3: Historic environment	The Policy is consistent with and builds on the guidance/policies within the NPPF which set out the importance of safeguarding the historic environment (see NPPF paragraphs 196 & 203)	
<b>Chapter 4.6 Infrastructure Policies</b>	Left blank	Left blank

<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
Policy ID1: Infrastructure and delivery	The Policy is consistent with the NPPF including the expectation that Plans make sufficient provision for infrastructure and that this can be secured through developer contributions (see NPPF paragraphs 20b and c, and 34)	

<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
<p>Policy ID2: Supporting the Department for Transport's "Road Investment Strategy"</p>	<p>Paragraph (1) is consistent with NPPF para 108b in considering that opportunities from proposed transport infrastructure are realised.</p> <p>Paragraph (2) is consistent with the NPPG on Transport evidence bases in plan making and decision taking.</p>	<p>This policy is no longer a method through which it can be determined if a Local Plan review is required, given the current trajectory of delivery.</p> <p>Individual assessment of sites at the point of application is considered to adequately determine cumulative impacts, in line with NPPF para 115.</p>

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<p>Policy ID3: Sustainable transport for new developments</p>	<p>Paragraph (1) is consistent with national policy, specifically NPPF paras 108, 114.</p> <p>Paragraph (2) is consistent with national policy, specifically NPPF paras 108, 109, 114, 116.</p> <p>Paragraph (3) SPD not progressed. See Policy ID10 for proposed routing of SMC and other cycling infrastructure.</p> <p>Paragraph (4)(a) is generally consistent with NPPF para 114d, 115. Para 4(b) has been superseded by Policy ID10.</p> <p>Paragraph (5) is consistent with national policy, specifically para 114a, 109.</p> <p>Paragraph (6) is consistent with national policy, specifically NPPF paras 114 &amp; 115.</p> <p>Paragraph (7) is consistent with NPPF paras 20b, 34. Not consistent with para 110d, needs to</p>	<p>Para (1) – proposals may now go further i.e., reducing the need to travel, inclusion of micromobility options.</p> <p>Para (2) – as above.</p> <p>Para (3) - SPD has not been progressed and is not likely to be progressed. However, it is still an aspiration and need for sites close to the proposed SMC (and other walking, cycling and public transport infrastructure) to contribute to its development as part of off-site mitigation.</p> <p>Para (9) the validation list is in the process of being updated.</p> <p>Para (10) - does not align with Guildford Parking Study (2020) (did not identify a need for more public car parking) or recent town centre masterplanning work to encourage modal shift. Not favourable to promote further.</p>

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	<p>mention Local Cycling and Walking Infrastructure Plans in preparation.</p> <p>Paragraph (8) is consistent with national policy, specifically NPPF para 34.</p> <p>Paragraph (9) is consistent with national policy, NPPF para 117 and the NPPG ‘Travel Plans, Transport Assessments and Statements’.</p> <p>Paragraph (10) the notion to dissuade cross-town vehicle trips, aiming to eliminate unnecessary congestion and further negative impact on air quality is generally in line with national policies. However, please see next column.</p>	
Policy ID4: Green and blue infrastructure	<p>The policy is consistent with the NPPF. It does not replicate all the issues covered by the NPPF and in certain instances provides additional policy.</p> <p>The policy requires developments to “Aim to achieve a net gain in biodiversity where appropriate”. However, in the NPPF 2023 (180) it states “Planning policies and decisions should</p>	<p>The LPDMP already goes beyond ID4 and the Environment Act by requiring qualifying schemes to achieve 20% BNG, bringing the Local Plan as a whole into compliance.</p> <p>The definition of green infrastructure at 4.6.37 has been expanded in the new NPPF to include all natural features with</p>

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	<p>contribute to and enhance the natural and local environment by... providing net gains for biodiversity” and under the Environment Act from January 2024 BNG will be mandatory. “Aim to” and “where appropriate” may not be considered aligned with this.</p> <p>Qualifying development must achieve a 10% BNG under the Environment Act and the wording of ID4 does not make this clear.</p>	<p>benefits that now specifically include economic, health and wellbeing benefits for climate, local and wider communities and prosperity.</p> <p>The policy does not reference the statutory Local Nature Recovery Strategy however this is covered by the LPDMP.</p> <p>The NPPF (102) adds nature and climate change as potential benefits of open space, which the policy as a whole is aligned with.</p> <p>The NPPF (103c) now clarifies that loss of open space policy now also applies to a former use as well as current use.</p> <p>The supporting text refers to an 8m buffer for main rivers, which is out of alignment with the 10m now specified by the EA. This supporting text is in any case superseded by LPDMP Policy P10(5).</p>
<b>Sites</b>	Left blank	Left blank

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>Paragraph 126 of the NPPF states that:            Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:</p> <p>a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and</p> <p>b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.</p> <p>Annual reviews are undertaken as part of the Land Availability Assessment. This assesses sites' suitability, availability and deliverability/developability. Whilst site</p>	

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	<p>allocations are in principle considered suitable for the use that they are allocated for; a further detailed consideration will be undertaken as part of the planning application process. As part of any update to the plan, consideration will need to be given to any sites which are as yet substantially unimplemented to determine whether they are still suitable for the use identified and whether they should be re-allocated in the new plan.</p>	
<b>Appendices</b>	Left blank	Left blank
Appendix 1: Housing Trajectory	<p>The Housing Trajectory is updated annually as part of the Council's Land Availability Assessment which informs the five year land supply position.</p>	
Appendix 2: Glossary	<p><b>A uses:</b> Use Classes A1-A3 of the Use Classes Order 1987 (as amended) were subsumed within Use Class E in amendments to the Order</p>	

in September 2020, whilst Use Classes A4 and A5 were reclassified as sui generis.

**Affordable Housing:** The entry includes all the affordable products referred to in Annex 2 of the NPPF and is therefore consistent with the NPPF. First Homes – which the NPPG now covers – are a form of discounted market housing and sold at a minimum discount of 30% against market value (therefore ‘at least 20% below market value’), and thus covered by the existing LPSS Appendix 2 definition.

**B uses:** Use Classes B1(a), B1(b) and B1(c) were replaced by Use Classes E(g)(i), E(g)(ii) and E(g)(iii) respectively in amendments to the Use Classes Order in September 2020.

**Entry-level exception site:**

New wording from NPPF 2023 in red: ‘update to paragraph 73’

**Green Infrastructure:** The definition is consistent with the NPPF, but with omissions in detail. The LPSS defines it as “a network of multi-functional green space” which the NPPF 2021 extends to “blue spaces and other natural features”. The LPSS refers to the “wide range of environmental and quality of life benefits for

local communities” which the NPPF 2021 extends to “a wide range of economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity”. Notably, the NPPF 2021 adds economic benefit to the social and environmental benefit identified in the LPSS glossary, which the LPDMP is consistent with where it references natural capital and ecosystem services.

**Habitat Regulations Assessment (HRA):** The LPSS refers to the Habitats Directive. The NPPF 2021 replaces the directive with references to the Conservation of Habitats and Species Regulations 2017.

**Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA):** This refers to the European SEA Directive but should now refer to the Environmental Assessment of Plans and Programmes Regulations 2004.

**Local Transport Plan (LTP)**

“Under the Transport ... Surrey County Council’s Local Transport Plan is called the ‘Surrey Transport Plan’ Local Transport Plan (LTP4).”

**Older people**

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>New wording from NPPF 2023 in red: ‘People over <u>or approaching</u> retirement age...’</p> <p><b>Sustainable transport modes</b></p> <p>Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, <del>low and ultra-low emission vehicles</del>, car sharing and public transport.</p> <p><b>Traffic calming</b></p> <p>Works to slow down <del>and/or discourage</del> motor traffic. These may include road humps, rumble strips, raised sections of road known as tables and “gateways” at the entrance to settlements.</p>	
Appendix 3: Maps showing 500m Catchment of Public Transport Interchange		Would be more effective as isochrone along available routes.

<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
Appendix 4: Evidence of active and comprehensive marketing	The NPPF does not specify how Local Plans should deal with the loss of employment sites, local shops and services that provide for everyday needs, tourism and visitor and cultural uses, but maintains the importance of developing and retaining these uses. Appendix 4 provides a more detailed framework of criteria for assessing the evidence of marketing required by LPSS policies E3, E5, E6 and E9, and LPDMP Policies ID7 and ID8, for planning applications that would result in their loss.	

<p>Appendix 5: Hierarchy of retail and service centres and Guildford Town Centre shopping frontages</p>	<p>The first part of Appendix 5 (Hierarchy of retail and service centres) is consistent with the NPPF, in particular paragraph 90, which sets out that planning policies should define a hierarchy of town centres and promote their long-term vitality and viability; define the extent of town centres and primary shopping areas and make clear the range of uses permitted in such locations; retain and enhance markets; allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed looking at least 10 years ahead; and recognise that residential development often plays an important role in ensuring the vitality of centres.</p> <p>The second part of Appendix 5 (Guildford Town Centre shopping frontages) refers to primary and secondary frontages, which have been removed from the NPPF. Nevertheless, their inclusion in the LPSS remains consistent insofar as they are used to make clear the range of retail and other uses appropriate in certain parts of the town centre.</p>	
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<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
Appendix 6: Infrastructure Schedule	The infrastructure schedule published in the LPSS was a snapshot in time based on the best available evidence. All schemes listed will need to be reappraised in light of the most recent evidence and any changed circumstances as part of the planning application process to understand what supporting infrastructure is necessary to support planned growth.	