

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

Interim SA Report

April 2020

Quality information

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Table of Contents

1.	Introduction.....	1
2.	What is the plan seeking to achieve?	2
3.	What is the scope of the SA?	3
Part 1: What has plan-making / SA involved up to this stage?		5
4.	Introduction to Part 1	6
5.	Selecting the reasonable alternatives.....	7
6.	Appraisal of the reasonable alternatives.....	11
7.	Developing the preferred approach	16
Part 2: What are the appraisal findings at this stage?		17
8.	Introduction to Part 2	18
9.	Appraisal of the Draft Plan.....	19
Part 3: What are the next steps?		41
10.	Plan finalisation	42
11.	Monitoring.....	42
Appendix I: Regulatory requirements		43
Appendix II: The SA Scope		47

1. Introduction

Background

- 1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Guildford Borough Local Plan: Development Management (DM) Policies, henceforth 'LPDMP'.
- 1.2 Once in place, LPDMP will supplement the recently adopted Local Plan: Strategy and Sites (2019), which deals with strategy and allocates sites for development. Specifically, LPDMP will provide further and more detailed planning policies for Guildford Borough Council ('the Council') use when making development management decisions, i.e. when determining planning applications.
- 1.3 SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Local Plans must be subject to SA.¹

SA explained

- 1.4 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.
- 1.5 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account alongside consultation responses when finalising the plan.
- 1.6 More specifically, the SA Report must answer the following **three questions** -
 - What has Plan-making / SA involved up to this point?
 - including with regards to consideration of 'reasonable alternatives'
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are the next steps?

This Interim SA Report²

- 1.7 At the current stage of plan-making, the Council is consulting on an *early* draft plan, under Regulation 18 of the Local Planning Regulations. This 'Interim' SA Report is therefore produced with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the plan.

Structure of this report

- 1.8 Although this is an 'Interim' SA Report (and does not therefore need to provide the information required of the SA Report), it is nonetheless helpful to structure this report according to the **three questions** above.
- 1.9 Before answering the first question, there is a need to further set the scene by answering two questions:
 - What is the plan seeking to achieve?
 - What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the plan seeking to achieve?

Introduction

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

Legislative and policy context

- 2.2 LPDMP is being prepared under the Town and Country (Local Planning) Regulations 2012 and underpinning primary legislation. It must reflect current Government policy as set out in the National Planning Policy Framework (NPPF, 2019) and Planning Policy for Traveller Sites (2015), and must also be prepared mindful of Government's online Planning Practice Guidance (PPG).
- 2.3 LPDMP is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, there is a need to account for the views of Surrey County Council and neighbouring local authorities on a wide range of planning matters including in respect of infrastructure; the Enterprise M3 Local Enterprise Partnership (LEP) on matters relating to the local economy; and a range of organisations in respect of effective planning for the natural environment, historic environment etc.
- 2.4 Finally, it is important to note that LPDMP will be prepared mindful of the 'made' Neighbourhood Development Plans (NDPs) for Burpham, Effingham, East Horsley and West Horsley, as well as several emerging NDPs. NDPs must be in general conformity with the strategic policies in the Development Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that made and emerging NDPs will be a consideration when preparing LPDMP.

Plan vision and objectives

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

What is the plan not seeking to achieve?

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

3. What is the scope of the SA?

Introduction

- 3.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan.
- 3.2 The aim here is to introduce the reader to the *broad scope* of the SA. **Appendix II** presents further information; however, it is not possible to define the scope of the SA precisely. Rather, there is a need for the SA scope to be flexible, responding to the scope of the emerging plan / options and evidence base.

Consultation on the scope

- 3.3 The SEA Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.³ As such, these authorities were consulted on an SA Scoping Report in 2019.
- 3.4 The outcome of the scoping process was an SA ‘framework’ comprising 23 objectives, along with a series of associated questions to guide the assessment process. The SA framework is presented in summary below, with the objectives organised under a series of broad topic headings.

The SA framework

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

³ In-line with Article 6(3) of the SEA Directive, these bodies were selected because *‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’*

Table 3.1: The SA framework

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

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

4. Introduction to Part 1

Introduction

- 4.1 The aim of this part of the report is not to relay the entire 'story' of plan-making to date, but rather the work undertaken to examine **reasonable alternatives** in early 2020, ahead of the current consultation.
- 4.2 Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with - see **Chapter 5**
 - present an appraisal of the reasonable alternatives - see **Chapter 6**
 - explain the Council's reasons for selecting the preferred option - see **Chapter 7**
- 4.3 Presenting this information is in accordance with the regulatory requirement to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the SA Report (N.B. as stated earlier, this is not the SA Report, but nevertheless aims to present the information required of the SA Report).

Reasonable alternatives in relation to what?

- 4.4 The legal requirement is to examine reasonable alternatives taking into account the objectives of the plan,⁴ which, as discussed above, are the same objectives that were used to guide preparation of LPSS. The SA process for LPSS focused attention on reasonable alternatives in respect of the 'spatial strategy', i.e. the question of how much development should be accommodated in the borough and where should it be located. LPDMP, however, is not dealing with the spatial strategy, hence there is a need to give consideration to what aspects of LPDMP should be the focus of alternatives appraisal.
- 4.5 The Council and AECOM recognised that one approach to identifying alternatives would be to ensure that each and every likely plan policy was developed in light of formal appraisal of reasonable alternatives. However, following discussion it was determined that this approach would not be appropriate, on the basis that reasonable alternatives could not be identified for all emerging policies. This reflected understanding that:
- In order for policy alternatives to be considered reasonable it must be possible to draw meaningful distinctions between them when appraised under the SA framework. Indeed, reasonable alternatives should be distinct to the extent that the appraisal serves to highlight differential 'significant effects' between them given that SA "*should only focus on what is needed to assess the likely significant effects of the plan*".⁵
 - Whilst it is helpful to consider the merits of an emerging policy approach relative to the baseline, or a 'do nothing option', these two options are not reasonable alternatives for SA purposes. This reflects the simple fact that the appraisal of any policy option can be defined as appraisal *against the baseline*. There is a separate regulatory requirement to appraise the emerging draft policies/plan against the baseline – see Part 2.
- 4.6 Following discussions, the Council and AECOM determined that it would be appropriate to appraise reasonable alternatives in respect of a sub-set of key policy areas for which a clear choice between distinct 'do something' alternative policies could be envisaged. Ultimately, it was determined to explore reasonable alternatives in respect of:
- Housing density;
 - Biodiversity net gain; and
 - Parking standards.

⁴ Regulation 12(2) requires that, when determining what should be a focus of alternatives appraisal, account is taken of "the objectives and geographical scope of the plan".

⁵ See paragraph 009 at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

What about other plan issues/objectives?

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

Whose responsibility?

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

Commenting on this part of the report

- 4.9 Comments are welcomed on:
- the decision to focus on alternatives in respect of the three plan issues listed above (this section);
 - the reasonable alternatives selected for appraisal in each instance (Section 5);
 - the appraisal of reasonable alternatives in each instance (Section 6); and
 - the Council's reasons for supporting the preferred option in each instance (Section 7).

5. Selecting the reasonable alternatives

Introduction

- 5.1 The aim here is to discuss “outline reasons for selecting the alternatives dealt with” in respect of the three emerging policy areas / issues for which it was determined appropriate to formally explore reasonable alternatives, as discussed above, namely:
- Housing density;
 - Biodiversity net gain; and
 - Parking standards.
- 5.2 Each of these policy areas / issues is considered in turn below.

Housing density

Discussion

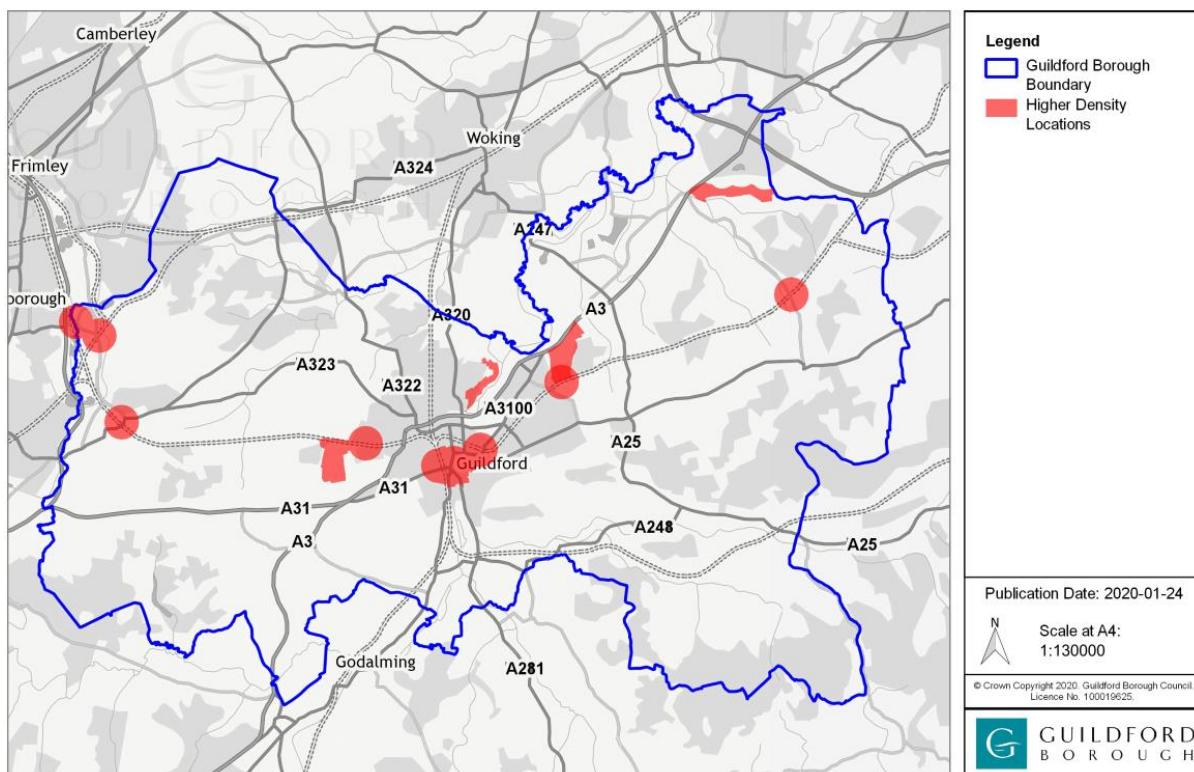
- 5.3 The NPPF states that the creation of high quality building and places is fundamental to what the planning and development process should achieve. It requires planning policies and decisions to promote and support development that makes efficient use of land.
- 5.4 Planning Practice Guidance also includes guidance on the efficient use of land and identifying appropriate densities. This includes considerations of accessibility, character, environmental constraint, infrastructure provision and development viability.
- 5.5 The National Design Guide sets out the characteristics of well-designed places and demonstrates what good design means in practice. The guidance identifies that well-designed new development will make efficient use of land with an amount and mix of development and open space that optimises density. The guide notably states that, to optimise density, it may be necessary to provide public transport infrastructure or to improve existing local transport services, and, it follows, that a transport hub may represent an opportunity for a local increase in density, where appropriate to local context and character.

- 5.6 There are established local objectives and policies related to securing the optimum use of land whilst respecting local character and environmental capacity. In particular, key policies within LPSS are: Policy S3 (Delivery of development and regeneration within Guildford Town Centre); Policy H1 (Homes for all); Policy D1 (Place shaping); and Policy ID3 (Sustainable transport for new developments).
- 5.7 However, there are recognised challenges locally that serve to identify the need for further and more detailed policy. For example, the development industry can favour large 4-5 bed homes in rural areas, which don't make the optimal use of land. The impact of low housing density ultimately results in the use of more land for housing.

The reasonable alternatives

- 5.8 Through discussions a tentative emerging preferred approach was identified, specifically one seeking to encourage optimal use of land through appropriate densities by A) listing key criteria that must be taken into account and B) identifying three broad types of location where higher densities should be explored, namely Guildford town centre, at strategic sites and at sites within 500m of a defined transport hub (these are designated by Policy E2 of the LPSS). This approach is flexible, rather than prescriptive, in that there is potential for discretion to be applied through the DM process, taking account of particular local and site-specific factors.
- 5.9 An alternative policy approach would involve being more prescriptive, with minimum density ranges set according to location - see Figure 5.1 - irrespective of local context and character (within reason, i.e. unless there are strong reasons why the minimum density could not be achieved).
- 5.10 In summary, the following two reasonable alternatives were established:
 - **Option 1** – a flexible criteria-based policy
 - **Option 2** – a more prescriptive policy with minimum densities for specific areas (see Figure 5.1)

Figure 5.1: Areas suited to higher densities (the town centre, strategic sites and sites close to a transport hub)



Biodiversity net gain

Discussion

Planning for biodiversity

- 5.11 It is known that biodiversity is declining globally at a rate unprecedented in human history. Nationally, human-driven land use changes (including agricultural intensification) have contributed to the loss and fragmentation of semi-natural habitats. Combined with other pressures, such as new development, climate change, air and water pollution, the impact on nature from human activity has been significant.
- 5.12 The State of Surrey's Nature Report (2017)⁶ identifies that species loss within Surrey is worse than nationally, with figures indicating a significant loss of species with 21% of species in decline. Guildford stands-out as a key borough within Surrey, containing internationally, nationally and locally protected habitats and species associated with a wide range of terrestrial landscape types as well as nationally and locally significant habitats associated with the River Wey and its tributaries.
- 5.13 The NPPF requires planning policies and decisions to contribute to and enhance the natural environment. Local Plans should protect and enhance valued sites; ensure that they are linked or otherwise functionally connected at landscape scales; recognise and plan for the wider benefits of natural capital including in terms of ecosystem services provided; and, deliver measurable net gains in biodiversity at appropriate scales. Planning for green infrastructure (GI) is an important element of the national strategy, with Natural England's guidance on GI (2009)⁷ highlighting the multifunctional benefits of GI.
- 5.14 At the County scale, the Surrey Nature Partnership is working with local authorities to set out an approach to conserving and enhancing biodiversity at landscape scales. The Natural Capital Investment Plan⁸ (NCIP) for Surrey sets out the broad actions for the next 25 years, including focusing on a network of Biodiversity Opportunity Areas (BOAs). These are areas where there are concentrations of important sites and within which habitat management and creation can be most effective in terms of biodiversity.
- 5.15 There are established local objectives and policies relating to biodiversity. A key policy within the adopted Local Plan is Policy ID4 (Green and blue infrastructure) which provides protection for European, national and local designated sites, seeks where appropriate that new developments deliver gains in biodiversity and also establishes the need to take account of the presence of BOAs. Policy ID4 reflects the international and national shift away from protection of sites to proactive intervention at landscape scales.

Planning for biodiversity net gain

- 5.16 As discussed, the NPPF is supportive of biodiversity net gain approaches, which can be defined as "development that leaves biodiversity in a better state than before".⁹ Specifically, paragraph 170 states that planning policies and decisions should minimise impacts on and provide net gains for biodiversity; paragraph 174 requires plans to pursue opportunities for securing measurable net gains; paragraph 175 requires planning decisions to encourage biodiversity improvements in and around developments; and paragraph 118 states that the planning system should take opportunities to secure net environmental gains.
- 5.17 Established Biodiversity Net Gain (BNG) approaches use habitats as a proxy for biodiversity in a given area, recognising that certain habitats will tend to support certain communities of species. By using habitat extent, quality and diversity as proxy measures, decision-makers can understand likely biodiversity losses or gains due to development. A key component of the BNG approach is the mitigation hierarchy (avoid, reduce, mitigate, compensate/offset), which ensures that a development proposal seeks to first avoid losses in biodiversity, where possible. Decision-making that adopts a BNG approach seeks to avoid or minimise biodiversity impacts in the first instance, and then deliver gains through habitat creation or enhancement.

⁶ Surrey Nature Partnership (2017) The State of Surrey's Nature [online] available at:

https://surreynaturepartnership.files.wordpress.com/2014/11/state-of-surreys-nature_web.pdf

⁷ Natural England (2009) Natural England's Green Infrastructure Guidance (NE176) [online] available at:

<http://publications.naturalengland.org.uk/publication/35033>

⁸ Surrey Nature Partnership (2018) Natural Capital Investment Plan for Surrey. [online] available at:

<https://surreynaturepartnership.files.wordpress.com/2018/03/natural-capital-investment-plan-forsurrey.pdf>

⁹ Biodiversity Net Gain. Good practice principles for development. A practical guide, CIEEM (2019)

<https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development-a-practical-guide/>

- 5.18 Defra undertook consultation in 2018 with respect to the concept of mandatory BNG within the planning system, and, in the 2019 spring statement,¹⁰ the Chancellor committed to making BNG mandatory as part of the forthcoming Environment Bill. Defra advocates application of a metric at the planning application stage to gauge the degree of biodiversity impact (following application of prescribed steps to ensure that effects are avoided and mitigated as fully as possible), and then delivery of necessary compensation in-line with prescribed rules.
- 5.19 The Defra approach is reflected in BNG “Metric 2.0”, a Beta version of which was released in July 2019. The Defra metric is based on application of a series of criteria to the assessment of habitat units, so that each habitat unit can be translated into “biodiversity units”. In simple terms, to achieve net gain, the biodiversity units score, at an agreed scale, must be increased as a result of development. The criteria used to translate habitat units into biodiversity units cover: distinctiveness / rarity, condition and extent.
- 5.20 Metric 2.0 also makes reference to Natural England’s National Habitat Network (NHN) Mapping.¹¹ This is a spatial dataset that describes the geographic extent and location of Habitat Networks for 18 priority habitats with additional data added to highlight areas where there is greatest potential for effective delivery of new priority habitats, either through creation or restoration. The NHN is designed for use alongside local knowledge to ensure that delivery of new priority habitat contributes most effectively to ecological networks / ecological connectivity at a landscape scale.
- 5.21 It is also important to note that the Environment Bill also proposes to introduce the requirement for Local Nature Recovery Strategies (LNRS) in England. It is understood that LNRS are intended to set out (by mapping existing nature assets and opportunities for enhancement) priorities and opportunities for protecting and investing in nature within a landscape context.

The reasonable alternatives

- 5.22 The emerging Environment Bill¹² and latest government guidance¹³ indicates the likelihood of a mandatory requirement for development in England to deliver ‘biodiversity net gain’ of 10%, hence this is clearly a reasonable option to explore for LPDMP. However, the Council believes that there may be an argument for requiring a more ambitious approach, noting local biodiversity sensitivities / issues and opportunities, and in light of initial analysis that serves to suggest that the financial burden to the developer increases only to a limited extent if the requirement is set at 20% rather than 10%.
- 5.23 As such, the following two reasonable alternatives were established:
- **Option 1** – 10% mandatory biodiversity net gain
 - **Option 2** – 20% mandatory biodiversity net gain

Parking standards

Discussion

- 5.24 Car ownership in the UK has risen steadily over the past 60 years, and despite some efforts in more recent decades to improve infrastructure and services to encourage people to make journeys on foot, by bicycle, on buses and trains, the need to provide for appropriate levels of parking in new development remains important. This is because both under and over provision can lead to a number of problems for new development and adjacent neighbourhoods. Amongst other things, over-provision can be visually detrimental and, by contributing to lower densities can increase the cost of new homes, whilst under-provision, amongst other things, can lead to obtrusive parking and overspill parking in nearby areas.

¹⁰ Net Gain Consultation Proposals, Defra (2018) <https://consult.defra.gov.uk/land-use/net-gain/>

¹¹ National Habitat Networks (England), Natural England (2019) <https://data.gov.uk/dataset/0ef2ed26-2f04-4e0f-9493-ffbdbfaeb159/national-habitat-networks-england>

¹² Bill 009 2019-21

¹³ Defra (2019) Net gain Summary of responses and government response [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf

- 5.25 A policy shift has occurred over time, from a maximum-standard approach pre-NPPF, to a more tailored approach since 2012. The current NPPF (2019) indicates that local authorities should only impose maximum parking standards for residential and non-residential development where there is clear and compelling justification necessary to the management of the local road network, or in order to optimise the density of development in city and town centres and other locations that are well served by public transport. Non-statutory guidance from Surrey County Council¹⁴ indicates parking standards in residential development should be tapered from higher maximum standards in suburban/edge/village/rural locations to lower maximum standards in town centre locations. Conversely, Neighbourhood Plans have included policies defining minimum parking standards in order to realise a greater number of on-plot parking spaces.
- 5.26 The Local Plan: Strategy and Sites (2019) signals that a Parking Supplementary Planning Document (SPD) will be prepared by the Council. Policy ID3 requires that development proposals provide an appropriate level of off-street vehicle parking such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users. It also states that consideration will be given to setting maximum parking standards for Guildford town centre in the SPD.
- 5.27 In advance of the forthcoming Parking SPD, the Draft Strategic Development Framework SPD (January 2020) includes electric vehicle charging standards for the strategic sites and also guidance on the design of on street car parking within new developments and the minimum dimensions of car parking spaces.
- 5.28 A new policy could be provided in LPDMP that supplements Policy ID3. This would then further define the policy parameters, with the detailed guidance provided in a Parking SPD.

The reasonable alternatives

- 5.29 Through discussions an emerging preferred approach was identified, to set maximum parking standards within the town centre, then a single minimum standard across the other areas. This differs from the current approach sought by Surrey County Council for tapered maximum standards.
- 5.30 As such, the following two reasonable alternatives were established:
- **Option 1** – a maximum standard for within the town centre, with a *single minimum* standard across the rest of the Borough
 - **Option 2** – a maximum standard for residential development within the town centre, with *tapered maximum* standards across the rest of the Borough

N.B. the decision was taken to focus on the matter of residential developments, although it is recognised that there are also issues associated with delivering parking for non-residential developments.

¹⁴ Surrey County Council (2018) Vehicular and Cycle Parking Guidance [online] available at: https://www.surreycc.gov.uk/data/assets/pdf_file/0005/155660/January-2018-Parking-Guidance-for-Development.pdf

6. Appraisal of the reasonable alternatives

Introduction

6.1 The aim of this chapter is to present assessment findings in relation to the alternatives introduced above.

Assessment methodology

6.2 **Tables 6.1 – 6.3** present the assessment findings in relation to the three policy areas for which options have been established (housing density, biodiversity net gain, and parking standards).

6.3 With each table:

Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects', using **red** (significant negative effect), **amber** (moderate or uncertain negative effect), no colour (no significant effect), **light green** (moderate or uncertain positive effect) and **dark green** (significant positive effect) and also rank the alternatives in order of performance, where one (also highlighted by a gold star) is best performing. Also, '=' is used to denote where it not possible to differentiate the alternatives with any confidence.

6.4 Every effort is made to predict effects / differentiate the scenarios accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects / differentiate accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions in order to reach a conclusion on a likely effect, this is made explicit in the assessment text.

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

Assessment findings

6.6 As discussed, alternatives assessment findings are presented within the three tables below. To reiterate, the alternatives are as follows:

- Density -

Option 1 – a flexible criteria-based policy

Option 2 – a more prescriptive policy with minimum densities for specific areas (see Figure 5.1)

- Biodiversity net gain -

Option 1 – 10% mandatory biodiversity net gain

Option 2 – 20% mandatory biodiversity net gain

- Parking standards (residential) -

Option 1 – a *single minimum* standard outside of the town centre

Option 2 – *tapered maximum* standards outside of the town centre

Housing density

Table 6.1: Housing density – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	2	★1	<p>There are a range of considerations that can assist in establishing appropriate densities for a site or a particular area, such as accessibility, character, environmental and infrastructure constraints and site viability. It follows that a flexible approach (Option 1) can potentially lead to negative impacts being avoided and opportunities realised in respect of wide ranging sustainability objectives. However, this assumes effective decision-making at the development management / planning application level, guided by clear guiding criteria. In this respect, the Strategic Development Framework Supplementary Planning Document (SPD, 2020) generates confidence given its focus on Borough-wide design principles (Part 2 of the SPD) and its presentation of detailed 'development frameworks' for each of the five strategic locations for growth within the Borough. Amongst other things, the SPD explains that: <i>"The starting point for every strategic development proposal must be a detailed observation of the strategic site and its physical context. [Such a] study will be expected to be thorough and detailed given the nature and complexities of each site. This is of key importance in gaining an understanding of place and to ensure locally distinctive and responsive designs."</i> The SPD generates confidence that decisions on density will be made taking into account: landscape context, including <i>"wider historical, social, cultural and physical"</i> dimensions; transport connectivity (<i>"Traffic levels in Guildford have an impact on the quality of everyday life for all residents and the development proposals for the strategic locations should lead the way in establishing a new benchmark for sustainable travel..."</i>); and the need to respond to biodiversity / green infrastructure constraints and opportunities (<i>"The adjacent land uses of a site must be clearly identified and accounted for... This will include.. ensuring that development positively addresses edges that comprise an area of open space, waterbody, or riverside, notably the River Wey..."</i>). The SPD also explains the important role of the Design and Access Statement (DAS) submitted as part of planning applications, which must demonstrate how design and layout has responded to existing land uses, setting and landscape context and the socio-economic context.</p> <p>A more prescriptive approach (Option 2) could lead to negative impacts in the Guildford town centre, given variations in topography and historic character, as highlighted in the recently adopted the Guildford Town Centre Views SPD, which identifies 15 important view cones. Alternatively, the localised constraints that exist within the town centre might lead to a "lowest common denominator" minimum density being set, which would run counter to the objective of maximising densities in-line with transport accessibility. Outside of the town centre, the reality is that most growth over the plan period in proximity to a transport hub (see Figure 5.1) is either already committed or a strategic allocation for which guidance on density already exists. There will be additional windfall growth in proximity to transport, but such sites are less suited to a prescriptive approach to density.</p> <p>In conclusion, it is difficult to argue against allowing for flexibility in respect of setting densities, although it is considered appropriate to flag a risk in respect of air quality and climate change mitigation as these are factors that might be taken into account more fully as part of a strategic exercise to set minimum development densities.</p> <p>With regards to effect significance, neither of the alternatives are predicted to result in significant effects in respect of any SA topic.</p>
Biodiversity	★1	2	
Climate change adaptation	★1	2	
Climate change mitigation	2	★1	
Digital infrastructure	★1	2	
Economy	★1	2	
Education	★1	2	
Employment land	★1	2	
Flood risk	★1	2	
Health	★1	2	
Historic environment	★1	2	
Housing	★1	2	
Land	★1	2	
Landscape and townscape	★1	2	
Poverty	★1	2	
Previously developed land	★1	2	
Rural economy	★1	2	
Safe / secure communities	★1	2	
Vibrant communities	★1	2	
Waste	★1	2	
Transport	★1	2	
Water quality	★1	2	
Water resources	★1	2	

Biodiversity net gain

Table 6.2: Biodiversity net gain – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	2	1	<p>With respect to biodiversity, there is a clear argument to suggest that Option 2 (20%) is preferable given rates of biodiversity loss in Surrey relative to the rest of England (largely due to high development pressure given proximity to Greater London). A requirement for 10% net gain would lead to greater uncertainty over whether BNG would, in practice, be achieved overall (at functional landscape scales). At the national scale, CIEEM argue that 10% may be within the margin of error for the valuation of habitats, and it may be too low to deliver real benefits. CIEEM has stated that they would like to see a minimum 20% net gain “<i>accompanied by clear requirements to account for the sources and likely accuracy of the data, for example distinguishing between field survey data and estimating area from online maps.</i>”¹⁵</p> <p>With regards to wider environmental and community objectives, as a first point it is important to note that the Environment Bill sets out an intention to “<i>introduce a mandatory requirement for biodiversity net gain in the planning system, to ensure that new developments enhance biodiversity and create new green spaces for local communities to enjoy</i>” [emphasis added]. More specifically, it is well established that mandatory biodiversity net gain, at a landscape scale delivered in the context of a LNRS, presents an opportunity to deliver wider environmental net gain(s) (ENG). The concept of ENG was introduced in the 25 Year Environment Plan (2018), which stated that the Government wants to “<i>establish strategic, flexible and locally tailored approaches that recognise the relationship between the quality of the environment and development. That will enable us to achieve measurable improvements for the environment – ‘environmental net gains’ – while ensuring economic growth and reducing costs, complexity and delays for developers.</i>” The 25 YEP did not define ENG, but the Government’s response to the consultation on mandatory BNG defined it as “<i>improving all aspects of environmental quality through a scheme or project. Achieving environmental net gain means achieving biodiversity net gain first and going further to achieve net increase in the capacity of affected natural capital to deliver ecosystem services</i>”.¹⁶ In practice, it is understood that the Defra Biodiversity Metric 2.0 will be complemented by analysis using the ‘Eco-Metric’. This tool (developed by Natural England and the University of Oxford) will be used to “<i>measure the net changes in natural capital and the ecosystem services it provides as a result of land-use change or development</i>”.¹⁷ It is, however, worth noting that there may not be a gain in all ecosystem services, and there may be trade-offs between services (e.g. a potential gain in pollination services at expense of food production in the case of creating wildflower grassland on agricultural land).</p> <p>In conclusion, an ambitious approach to BNG is supported in respect of the majority of objectives, although there is perhaps a degree of risk in respect of housing and employment land objectives. Risks are uncertain as current understanding is that a 20% requirement would not lead to an unacceptable financial burden on the developer. Further evidence is required to understand the scale of the risk involved.</p> <p>With regards to effect significance, it is possible to predict likely significant positive effects under Option 2 in respect of biodiversity, with other effects much more uncertain and likely to be of lower significance.</p>
Biodiversity	2	★1	
Climate change adaptation	2	★1	
Climate change mitigation	2	★1	
Digital infrastructure	=	=	
Economy	2	★1	
Education	2	★1	
Employment land	★1	2	
Flood risk	2	★1	
Health	2	★1	
Historic environment	2	★1	
Housing	★1	2	
Land	2	★1	
Landscape and townscape	2	★1	
Poverty	2	★1	
Previously developed land	=	=	
Rural economy	2	★1	
Safe / secure communities	2	★1	
Vibrant communities	2	★1	
Waste	=	=	
Transport	2	★1	
Water quality	2	★1	
Water resources	2	★1	

¹⁵ <https://cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf>

¹⁶ <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

¹⁷ <https://ecosystemsknowledge.net/ecometric>

Parking standards

Table 6.3: Parking standards – alternatives appraisal

Topic	Option 1	Option 2	Discussion
Air quality	★1	2	<p>There are arguments for restricting car parking from a climate change mitigation perspective, and also potentially from a health perspective, which might potentially be achieved through the definition of maximum parking standards (Option 2). Specifically, restriction of parking spaces can stimulate modal shift away from use the private car towards use of active (walking, cycling) and public (buses, trains) modes of transport. There are also arguments to suggest restricted parking can lead to more land being made available for other uses, which could lead to benefits in respect of other sustainability objectives.</p> <p>However, it is a challenge to conclude benefits with any confidence. This is because residents might respond to a restricted number of parking spaces by parking on-roads, which can also cause problems in respect of localised traffic congestion and impacts to the urban realm. Whilst it is recognised that design and enforcement (such as yellow lines) can provide mitigation, residual impacts can include:</p> <ul style="list-style-type: none"> • Air quality – increased stop-start leads to increased air pollution. • Climate change mitigation – on-road parking can pose problems for bus movements and also dissuade cyclists. • Safe/secure communities – on-road parking can be an impediment to both safe cycling and safe walking including for those with mobility challenges, e.g. wheelchair and mobility scooter users. • Historic environment – on-road parking can impact on the urban realm, potentially with implications for the setting of historic assets.
Biodiversity	=	=	
Climate change adaptation	=	=	
Climate change mitigation	?	?	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	2	★1	
Health	?	?	
Historic environment	★1	2	<p>There is also a need to consider the risk of insufficient parking serving to restrict the shift towards electric vehicles, as such vehicles require designated parking spaces with access to a charging point. This could lead to negative implications in respect of climate change mitigation and air quality, but also in terms of the economy, recognising that electric vehicle production is a potential major economic growth area.</p>
Housing	=	=	
Land	2	★1	<p>There is also a need to consider the risk of insufficient parking in more rural areas leading to a situation whereby residents struggle to access services and facilities and employment. Under Option 2 maximum standards would be tapered, but there might nonetheless be a risk that maximum standards prove overly restrictive in some instances, e.g. if the accessibility of a location reduces over time, perhaps because of the loss of a bus service or a local school or GP surgery closing. However, effects are mostly uncertain and likely to be relatively marginal.</p>
Landscape and townscape	★1	2	
Poverty	=	=	
Previously developed land	=	=	
Rural economy	★1	2	<p>This discussion has so far served to highlight quite wide-ranging benefits associated with supporting <i>minimum</i> parking standards; however, it will be important to ensure that such standards are not set too high such that opportunities for low-car development outside of the town centre are unduly restricted. For example (and notably), it will be important not to restrict the potential to bring forward low-car developments within those parts of the Weyside Urban Village, Blackwell Farm and Gosden Hill Farm strategic allocations that are served by the Sustainable Movement Corridor (e.g. the two “high density hubs” at Gosden Hill Farm identified by the Draft SDF SPD).</p>
Safe / secure communities	★1	2	
Vibrant communities	=	=	
Waste	=	=	
Transport	★1	2	<p>In conclusion, Option 1 is supported in respect of a number of objectives, including ‘transport’ on balance. However, Option 1 leads to tensions in terms of land and flood risk (due to impermeable hard-standing leading to increased surface water runoff), and there are question marks in respect of climate change mitigation and health. Significant effects are not predicted.</p>
Water quality	=	=	
Water resources	=	=	

7. Developing the preferred approach

Introduction

- 7.1 The aim of this section is to present the Council's response to the three alternatives appraisal tables presented in Section 6 and, in turn, present the Council's reasons ('justification') for selecting a preferred option in each case.

Housing density

- 7.2 The preferred option is Option 1 for the following reasons (text provided by the Council):

"The NPPF and PPG set out a range of considerations and tools that can assist in establishing appropriate densities on a site or in a particular area, such as accessibility, characterisation and design studies, environmental and infrastructure assessments and site viability. This is considered preferable to setting minimum density ranges for specific locations (the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges). To set out minimum density ranges is considered to be restrictive and complicated to ascertain and will limit the flexibility that is often needed when determining a planning application.

The Council's preferred option requires the optimal use of land by building homes at the most appropriate density. It is considered the most appropriate approach for Guildford. To apply prescriptive density ranges would restrict the flexibility to take all the site constraints and considerations into account. Sites within Guildford can often have their own challenges, such as the topography of the site, being partially within the flood plain or the impact on views which are crucial to the character and setting of the town centre. Flexibility is needed to ensure the right development can take place. Whilst seeking the optimum use of the land there also needs to be flexibility to ensure that a well-balanced range of housing can come forward to meet Guildford's housing needs.

When considering the relevant issues and options for housing density in Guildford, the Council's preferred approach is to enable well-designed housing at an appropriate density. There will be a presumption for higher density development in the Town Centre. In the Town Centre there are more limited opportunities for development, yet it is a sustainable location so housing density needs to be optimised. There will also be a presumption for higher density development on strategic sites and within 500 metres of existing or planned transport interchanges. This is because the size of strategic sites will enable thoughtfully designed higher densities, and being in close proximity to transport interchanges enables opportunities to optimise densities on sustainable sites.

The results of the assessment suggest that the preferred option provides a greater amount of guidance and flexibility specific to Guildford borough to help meet the relevant Local Plan objectives."

Biodiversity net gain

- 7.3 The preferred option is Option 2 for the following reasons (text provided by the Council):

"Adopting a BNG of 20 per cent is considered more reasonable than 10 per cent given rates of biodiversity loss in Surrey. At 10 per cent there is greater uncertainty over whether BNG will be achieved overall, and the cost of increasing the BNG level from 10 to 20 per cent does not appear to be prohibitive. Adoption of the standard is subject to full plan viability testing."

Parking standards

- 7.4 The preferred option is Option 1 for the following reasons (text provided by the Council):

"The preferred option takes a spatially-differentiated approach to the provision of vehicle parking for new residential developments, with the focus of restraint on Guildford town centre. In areas of the borough outside Guildford town centre, the preferred option seeks to manage and avoid potential problems of congested on-street parking in new development and overspill parking on adjacent local streets. Standards for both the minimum provision of cycle parking and electric vehicle charging facilities are the same for both options considered."

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

8. Introduction to Part 2

- 8.1 The aim of this part of the report is to present an appraisal of the Draft LPDMP.
- 8.2 This introductory section presents an overview of the Draft LPDMP and discusses appraisal methodology.

Overview of the Draft LPDMP

- 8.3 The Draft LPDMP presents 38 policies under the following headings:

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

Appraisal methodology

- 8.4 The appraisal identifies and evaluates ‘likely significant effects’ of the plan, as a whole, on the baseline situation in respect of the sustainability topics/objectives that comprise the SA framework (see Table 3.1).
- 8.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and an understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility to the non-specialist). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Draft LPDMP in more general terms.
- 8.6 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations (2004). So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for LPDMP to impact on the baseline when implemented alongside other plans, programmes and projects that are ‘in the pipeline’. These effect ‘characteristics’ are described within the appraisal as appropriate.

Adding structure to the appraisal

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

Table 8.1: Structure of each topic-specific appraisal narrative

Sub-heading	Aims of the narrative
Commentary on policies	Discuss policies in isolation and in combination and make recommendations.
Appraisal of the plan as a whole	Predict and evaluate significant effects of the Draft LPDMP

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

9. Appraisal of Draft LPDMP

Introduction

- 9.1 The aim of this chapter is to present an appraisal of Draft LPDMP under the 23 SA topics that comprise the SA framework (see Table 3.1), drawing on the issues and objectives established through scoping.

Air quality

- 9.2 Sustainability objective:

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

Commentary on draft policies

- 9.3 Air quality in Guildford is generally good and meets the National Air Quality Standard for nitrogen dioxide (NO₂). However, road traffic is a significant cause of air pollution in the borough. Public Health England estimates that in Guildford Borough 5.7 per cent of deaths of those aged 25 years and over arise from long-term exposure to anthropogenic particulate air pollution.
- 9.4 There are currently two Air Quality Management Areas (AQMAs) declared in the Borough due to exceedances of the annual mean Air Quality Strategy (AQS) objective for NO₂ at 'The Street, Compton' (declared in 2017) and 'Shalford' (declared in 2019).
- 9.5 The NPPF requires the prevention of new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution and wherever possible, help to improve local environmental conditions. Para 181 states that planning policies should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and seek opportunities to improve air quality, such as through traffic and travel management, and green infrastructure provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.
- 9.6 LPDMP does not propose any further growth to that outlined in LPSS which could further affect air quality. The 2018 SA Report Addendum for LPSS draws attention to the findings of the 2017 Air Quality Review which concludes that the effects of LPSS on annual mean NO₂ concentration will be negligible in the majority of the Borough. However, further detailed modelling is identified as a requirement for certain locations including the A3, Ripley Bypass; Aldershot East; and the area around the A3/ A31 junction at Onslow Village. Also the large-scale development proposed at Wisley Airfield is noted for potential significant adverse effects on air quality due to an anticipated significant change in vehicle flows on the A3.
- 9.7 In this respect, LPDMP provides enhanced policy mitigation which is likely to support air quality improvements and address the potential impacts arising from large-scale development sites proposed through LPSS to a large extent. LPDMP proposes the addition of **Policy P11** (Air Quality and Air Quality Management Areas) with the identified aim of reducing "*exposure to poor air quality across the borough*" and improving levels of air pollutants within AQMAs. The policy is intended to "*only permit development where it will not give rise to adverse impacts on health and quality of life from air pollution*", further to this "*development proposals within or adjacent to an AQMA will be expected to be designed to mitigate the impact of poor air quality on future occupiers*". Development proposals which have the potential for significant air quality impacts will be required to submit an air quality assessment. This is identified as any development; classed as major development which has the potential for impacts individually or cumulatively; likely to result in increased emissions within an AQMA; introducing biomass technology; or introducing new sensitive receptors within an AQMA. Further to this, where an air quality assessment identifies an unacceptable residual impact on air quality, an "*emissions mitigation assessment and cost calculation will be required*". The preferred policy draft also outlines that development will be required to "*demonstrate conformity with the Institute of Air Quality's guidance*".

- 9.8 Policy guidance in relation to sustainable transport is also set to be significantly enhanced by LPSS, with positive implications for air quality. This must be considered alongside the growth strategy of LPSS which maximises sustainable transport access and seeks to reduce the need to travel. The delivery of two new rail stations and a 'Sustainable Movement Corridor' as proposed through LPSS will deliver significant transport improvements in this respect and indirectly benefit air quality. The additional policy provisions of LPDMP for improvement of the cycle network (**Policy ID10**) and parking standards (**Policy ID11**) will also contribute to improved access and more sustainable movements; supporting reduced congestion levels to the indirect benefit of air quality. In relation to parking, the policy draft recognises the effects of under-provision in respect of causing congestion on local streets (see further discussion in Section 6)
- 9.9 The retention and enhancement of open green spaces, as well as a requirement for biodiversity net gain, is also likely to support air quality. LPDMP provides more detailed policy requirements for; biodiversity net gain (**Policy P7**); the protection of existing open spaces (**Policy ID5**); and the provision of new spaces in new development (**Policy ID6**), indirectly providing minor benefits for air quality.
- 9.10 Finally, in respect of housing density (**Policy H4**), air quality implications of a flexible criteria-based policy are discussed in Section 6 of this report, with the conclusion reached that the proposed policy approach gives rise to a degree of concern, in that air quality considerations might potentially be most affectively addressed through a prescriptive approach deriving from a strategic process of evidence gathering an analysis. These concerns are uncertain, given good potential to take account of air quality and wide-ranging further considerations through the development management process; however, it is **recommended** that further work is undertaken to understand the strategic constraints and opportunities that exist.

Appraisal of the Draft LPDMP

- 9.11 Draft LPDMP supports the provisions of LPSS with supplementary and more detailed guidance in relation to managing air quality impacts with the aim of both avoiding and mitigating potential negative effects, particularly those arising as a result of the growth strategy proposed through LPSS. A potential tension is highlighted in respect of the proposed flexible criteria-based approach to development density, although this is highly uncertain. Overall **minor positive effects** are anticipated.

Biodiversity

- 9.12 Sustainability objective:

- Conserve and enhance biodiversity, geodiversity and the natural environment

Commentary on draft policies

- 9.13 Guildford Borough has a wide range of habitats and species, many of which are threatened or endangered. Priority habitats include heathland, ancient semi-natural woodland and semi-improved grasslands, along with important river habitats. Sites consisting of lowland heathland habitat form part of the Thames Basin Heath Special Protection Area (SPA) and Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC). There are also numerous Sites of Special Scientific Interest (SSSIs) throughout the Borough, as well as locally designated Sites of Nature Conservation Importance (SNCIs).
- 9.14 LPDMP does not propose any further growth or development sites to that proposed through LPSS; which could adversely affect designated habitats and species. However, by addressing wider biodiversity enhancement goals in development management, LPDMP provides good opportunity to deliver real benefits for biodiversity. The draft Plan (biodiversity supporting text) recognises that the "*UK's biodiversity decline is so severe that heightened efforts to bring about recovery (as opposed to merely arresting loss) are essential*" and that biodiversity losses have been more acute within Surrey.
- 9.15 In response to these challenges, LPDMP proposes maximising biodiversity gains in new development. **Policy P6** (Biodiversity in new developments) will require development "*to prioritise biodiversity in their proposals as a general principle*", particularly when located within or adjacent to a Biodiversity Opportunity Area (BOA) where development should "*protect the designated and priority habitats and species in the BOA and improve habitat connectivity across the BOA.*" The policy seeks to imbed biodiversity principles in planting schemes and landscaping, features on building structures, and site design.

- 9.16 **Policy P7** (Biodiversity net gain) also seeks to ensure that development maximises contributions to net gain, with the requirement for “a *minimum gain of 20 per cent*”. Major developments are required to follow DEFRA’s net gain calculation methodology (Biodiversity Metric 2.0) and minor developments are required to follow a more simplified version of the metric. This is higher than the emerging government guidance¹⁸ which requires a minimum 10% net gain, with the aims of addressing acute biodiversity losses, whilst minimising knock-on effects in terms of development viability. This measure to secure increased biodiversity enhancement is considered likely to lead to significant positive effects with regards to biodiversity.
- 9.17 Biodiversity protection is also enhanced through the policy provisions:
- **Policy P6** (Biodiversity in new developments) recognises the potential impacts (including recreational pressures and light pollution) arising from development containing or near to sensitive habitats and watercourses. The Policy seeks appropriate mitigation, including buffers and, where appropriate, barriers.
 - **Policy P8** (Woodland, trees, hedgerows and irreplaceable habitats) details the range of irreplaceable habitats, which includes ancient woodland, ancient wood pasture, ancient (or important) hedgerows, unimproved grassland and wet heathland and bogs. The Policy identifies that “*development resulting in the loss, damage or deterioration of irreplaceable habitats*” will largely be refused, and planning proposals are expected to “*set out clearly any likely impacts on irreplaceable habitats*”. Improved green linkages are also sought under the policy provisions, alongside the incorporation of trees within the public realm.
 - **Policy P9** (Priority species and habitats on undesignated sites) further enhances local biodiversity protections through the recognition and protection of additional features that contribute to ecological connectivity in the Borough, particularly in development sites adjacent/ near to priority habitats or species.
 - Quarries and chalk and sand pits are also recognised for their contribution to geodiversity. The designated Regionally Important Geological/ Geomorphological Sites (RIGS) are afforded greater protection through **Policy P14**, which requires that any development proposals that are likely to materially harm the conservation interests of RIGS “*must demonstrate that the need for the development clearly outweighs the impact on biodiversity.*”

Appraisal of the Draft LPDMP

- 9.18 Draft LPDMP provides additional protections for biodiversity and seeks to take a proactive approach, which should support key sites and ecological connectivity and combat acute biodiversity losses across Surrey. Of particular note is the ambitious approach proposed in respect of required biodiversity net gain. Overall **significant positive effects** are anticipated.

Climate change adaptation

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

Commentary on draft policies

- 9.20 It is recognised that climate change mitigation alone will not be enough to address the issues of climate change. Weather patterns and the climate are changing and will continue to do so for the foreseeable future, making it important for new (and existing) development to consider ‘lifetime’ buildings which are suited to current and future climate conditions, and conducive to overall health and wellbeing. Anticipated impacts include hotter and drier summers, warmer and wetter winters, and an increase in heavy rain, storm events and flooding.

¹⁸ Defra (2019) Net gain Summary of responses and government response July 2019 [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf

- 9.21 The draft Plan recognises (in supporting text) that modular buildings and offsite construction methods operating under factory conditions, are less wasteful and are typically able to deliver buildings that are much more energy efficient than traditional builds. *“Construction is quicker, safer, less affected by weather has less reliance on traditional skills which are in short supply, and the end product is generally of a higher and more consistent quality, bringing benefits to both the builder and the customer.”* The benefits of both passive heating and passive cooling in design are also recognised, as well as natural features and measures to address the urban heat island effect. The plan further identifies the benefits of permeable surfaces and features that store water or slow it down in both; reducing surface water flooding and helping developments become more resilient to the more severe rainfall events likely to result from climate change; and in returning water to ground sources reducing the impact of drier summers.
- 9.22 **Policy D2** (Climate Change, Sustainable Design, Construction and Energy) requires all development to be fit for purpose and remain so into the future by incorporating adaptations that avoid increased vulnerability and offer resilience to the full range of expected climate change impacts. It requires adaptation information to be provided in a Sustainability Statement for major development or within proportionate sustainability information for non-major development.
- 9.23 LPDMP seeks to enhance policy measures to combat adaptation and resilience. **Policy D12** (Sustainable and Low Impact Development) which *“expects developments to consider the lifecycle of buildings and public spaces, including how they can be adapted and modified to meet changing social and economic needs and how materials can be reused or recycled at the end of their lifetime.”*
- 9.24 **Policy D13** (Climate Change Adaptation) seeks to *“deliver climate change resilient development”*. The policy requires buildings are designed and constructed providing for the *“comfort, health, and wellbeing of current and future occupiers over the lifetime of the development, covering the full range of expected climate impacts and with particular regard to overheating. Developments likely to accommodate vulnerable people, such as schools and care homes, should demonstrate that their specific vulnerabilities have been taken into account with a focus on overheating.”* Further to this, *“buildings are required to incorporate passive cooling measures and the exclusion of conventional air conditional air conditioning wherever possible in line with the cooling hierarchy.”* Schemes are also required to *“minimise the urban heat island effect”* and *“demonstrate adaptation for more frequent and severe rainfall events.”* The provisions seek to maximise climate change resilience with good potential for minor long-term positive effects.

Appraisal of the Draft LPDMP

- 9.25 The draft Plan seek to minimise the effects of overheating and increase resilience to the impacts of a changing climate, particularly for vulnerable groups. The drafted policy provisions are considered likely to lead to **minor positive effects**.

Climate change mitigation

- 9.26 Sustainability objective:
- Mitigate the causes of climate change through reducing emissions of greenhouse gases and efficient use of natural resources

Commentary on draft policies

- 9.27 Reducing greenhouse gas emissions is key to limiting the impacts of climate change, and action will need to take place at a range of levels; global, national and local. At a local level, the local plan can ensure that new developments are designed to produce fewer GHG emissions and can also enable retrofit improvements to existing developments to reduce their emissions. The Local Plan can further support reduced emissions by locating new development in areas which minimises the need to travel and maximises access to sustainable modes of transport, and by identifying opportunities for renewable energy generation and more efficient energy use, such as that associated with District Heating Networks.

- 9.28 The proposed Future Homes standard may deliver either a 20 per cent or, the government's favoured option, a 30 per cent improvement to building regulations carbon emissions standards for new homes. If this improvement is delivered nationally, it may be the case that a local standard is not necessary. Alongside these changes, the government is considering amending the Planning and Energy Act 2008 so that it no longer grants powers to Local Planning Authorities to set energy efficiency standards for homes, which will affect what can be achieved through local planning policy. At this stage, the Council's preferred approach is to not propose a policy and instead await the outcome of the government's consultation.
- 9.29 **Policy D2** requires the submission of a sustainability statement for major development and sustainability information for non-major development. Both must include information about how materials will be used efficiently and how waste will be avoided. The Policy requires development to follow the energy hierarchy and requires new buildings to achieve a carbon dioxide emissions standard that is 20 per cent lower than the relevant building regulations standard through improvements to the energy performance of the building (low energy design and efficient fabric) and the provision of low carbon and renewable energy technologies. The policy also provides support and encouragement for further development of both combined cooling heating and power (CCHP) and combined heating and power (CHP), in particular, due consideration of such schemes is required within 'Heat Priority Areas' (as defined on the Policies Map). The policy requires that where these exist already, development must "*connect to them or be connection-ready*".
- 9.30 The 2018 SA Addendum Report concluded in relation to LPSS that "*the plan leads to a reasonably strong likelihood of reduced average per capita CO2 emissions from the built environment, given a focus on strategic scale schemes and the policy requirements set to be put in place*".
- 9.31 **Policy D12** (Sustainable and Low Impact Development) seeks to expand on the energy hierarchy consideration by introducing "*an explicit requirement for schemes to follow a low energy design and energy efficient fabric approach to ensure that schemes maximise energy reductions before low carbon and renewable energy technology is considered, in line with the energy hierarchy*". It also seeks to minimise embodied carbon in construction and at the end of the lifecycle. The measures promote energy efficiency and a fabric first approach which is considered likely to support minor long-term positive effects in relation to climate change mitigation.
- 9.32 Alongside these measures, **Policy D15** (Large Scale Renewable and Low Carbon Energy) also identifies the intention to allocate one or more sites for renewable and low carbon energy development "*in appropriate locations where visual and other impacts will be minimised and where energy potential is good*." This will significantly support the identification and delivery of medium to larger-scale renewable energy schemes, which may currently be risk-adverse given the extent of Green Belt coverage in the Plan area. As a result, significant positive effects are anticipated.
- 9.33 With regards to parking standards (**Policy ID11**), there is potentially a degree of tension associated with the proposed approach, which involves setting of minimum parking standards for residential developments outside of the town centre; however, there is much uncertainty, as discussed in Section 6 of this report.
- 9.34 Finally, in respect of housing density (**Policy H4**), implications of a flexible criteria-based policy for transport-related greenhouse gas emissions are discussed in Section 6, with the conclusion reached that the proposed policy approach gives rise to a degree of concern, in that the relationship between density and 'sustainable transport' connectivity might potentially be most affectively addressed through a prescriptive approach deriving from a strategic process of evidence gathering an analysis. These concerns are uncertain, given good potential to take account of climate change mitigation and wide-ranging further considerations through the development management process; however, it is **recommended** that further work is undertaken to understand the strategic constraints and opportunities that exist.

Appraisal of the Draft LPDMP

- 9.35 The additional policy provisions of LPDMP are supportive of energy efficiency and also of note are policy criteria for identifying suitable locations for medium to large-scale renewable energy development. However, there is considerable uncertainty at the current time following the recent Government consultation on options in respect of requiring that all new development meets a Future Homes Standard. There is also some uncertainty at the current time regarding the merits of the proposed approach to housing density (i.e. a flexible criteria-based approach) and residential parking standards (i.e. minimum standards outside of the town centre). As such, it is appropriate to conclude **uncertain effects** at the current stage.

Digital infrastructure

9.36 Sustainability objective:

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

Commentary on draft policies

9.37 The National Design Guide¹⁹ (2019) echoes established good practice on development for climate change. It recognises that

“New construction techniques may contribute towards efficiency, productivity and the quality of new homes and buildings. These include the off-site manufacture of buildings and components using innovative and smart technologies supported by digital infrastructure”.

9.38 It also recognises that *“well-designed places also have high-speed digital connectivity in order to provide options and information for education, health, leisure, social interaction, businesses and home working.”*

9.39 LPSS promotes the creation of ‘smart places’ through policy D1 (Place Shaping) where design “seeks to achieve high-quality digital connectivity” and “supports technological and digital advances, including the provision of sufficient ducting space for future digital connectivity infrastructure”. Fibre To The Premises (FTTP) is encouraged where practical, alongside mobile connectivity within the development and access to services from a range of providers.

9.40 LPSS identifies that *“the provision and uptake of reliable and high speed broadband has been a major issue reported by rural businesses in certain parts of the Borough”*, and in this respect the intrinsic links between digital infrastructure and the rural economy are recognised. It is also recognised that extending superfast broadband is one of the priorities set out in the Corporate Strategy. In response to these challenges **Policy E5** (Rural Economy) identifies that the Council will work with partners *“to support and improve the provision of internet services where needed in rural areas and enhance digital inclusion in such areas.”* The Policy recognises that *“this will help to retain and promote services and types of business, including traditional agriculture, and help to create more sustainable villages.”*

9.41 LPDMP does not propose any further thematic policy directly relating to digital infrastructure.

Appraisal of the Draft LPDMP

9.42 The provisions of LPSS largely support positive effects in relation to digital infrastructure and no further direct effects are identified through LPDMP, which does not provide any further thematic policy in this respect. As a result overall **neutral effects** are anticipated.

Economy

9.43 Sustainability objective:

- Maintain Guildford borough and Guildford town’s competitive economic role

Commentary on draft policies

9.44 The Corporate Plan²⁰ (2018-2023) states that the Borough’s economy continues to perform well, being one of the strongest and most vibrant outside London, but there are signs that competitiveness could be lost to other locations. The main priority identified through this Plan is to encourage economic growth through knowledge, innovation and creativity. Support is also provided for the Enterprise M3 Local Enterprise Partnership (LEP) and its wider objectives to ensure that the local economy remains innovative, well-balanced and socially, environmentally and commercially sustainable.

¹⁹ MHCLG (2019) National Design Guide [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

²⁰ Guildford Borough Council (2018) Corporate Plan 2018 – 2023 [online] available at: <https://www.guildford.gov.uk/article/17282/Corporate-Plan-2018-2023>

- 9.45 Guildford town centre is a highly successful destination for shopping with LPSS recognising that *“the centre has also proven to be one of the most economically resilient in the country in times of economic downturn, primarily due to its largely affluent population and attractive environment.”* LPSS identifies opportunities for the town centre as potentially including; *“a focus on leisure and other town centre uses that encourage people to visit, reducing the dominance of traffic congestion and surface car parks, and enhancements to the riverside, buildings and public spaces between them.”* The role of the Guildford Town Centre Regeneration Strategy²¹ in delivering improvement opportunities is also recognised and supported. The Regeneration Strategy provides seven key ambitions, which includes (but is not limited to); a new community riverside park, new pedestrian and cycle routes, housing sites balanced with other more traditional town centre uses, and protection and enhancement of the townscape and character.
- 9.46 As identified under the employment land SA theme, economic development is largely directed under LPSS which allocates land for future economic growth across the borough and seeks to maintain and enhance the role of service and retail centres. The delivery of economic development is largely guided through LPSS Policy S2 (Planning for the Borough – our spatial development strategy) and thematic policies E1 to E9, and it is identified (in supporting text) that *“the preference is to locate new retail proposals on town centre sites, to make most effective use of these sites and ensure the town centre’s continued economic performance and vitality in line with the NPPF.”* The provisions within these policies for Surrey Research Park and the rural economy seek to promote not only growth in key sectors, but also economic diversity that contributes to varying needs across the Borough.
- 9.47 LPDMP seeks to provide additional policy guidance for rural and horse-related development. **Policy E10** (Rural Development (including agricultural diversification)) seeks to clarify the types of new buildings or changes of use of buildings and land that the Council would consider acceptable in principle. Within the Green Belt this includes small-scale sports and recreational facilities as well as conversion of redundant agricultural buildings for small-scale businesses or recreational uses. Within the countryside (outside of the Green Belt) a broader range of uses are identified as potentially acceptable, including farm shops, farm diversification proposals, tourist accommodation, small-scale rural tourism attractions, small-scale leisure facilities and horticultural nurseries and other small-scale business enterprises. The policy supports a range of appropriate activities which are likely to support rural economies, and minor long-term positive effects are anticipated in this respect.
- 9.48 **Policy E11** (Horse-related Development) seeks to support horse or other equine-related development where appropriate, and to ensure appropriate consideration is given to rural locations, a transport assessment is required under this policy for any such development of a large-scale; ensuring the vitality of the rural economy in the long-term.
- 9.49 The provisions of **Policy D4** (Achieving High-Quality Design and Local Distinctiveness) will also support economic performance by retaining and enhancing the character and quality of key town and service centres to maintain and increase their attraction and offer. The provisions of **Policy D11** (Corridor of the River Wey and Guildford and Godalming Navigation) also support the aims of the Guildford Town Centre Regeneration Strategy; specifically seeking *“publicly accessible riverside walkways and/ or cycle routes to enhance the vitality of the riverside”* and minor long-term positive effects are anticipated in this respect.

Appraisal of the Draft LPDMP

- 9.50 The additional rural development policies proposed in LPDMP support a range of appropriate land uses and types of rural business activity to maintain economic vitality in these areas. Additional policy provisions relating to design should also support town centre regeneration aims. Overall **minor positive effects** are anticipated.

²¹ Guildford Borough Council (2017) Guildford Town Centre Regeneration Strategy 2017 [online] available at: <https://www.guildford.gov.uk/article/20314/Town-Centre-Regeneration-Strategy>

Education

9.51 Sustainability objective:

- Improve levels of education and skills in the population overall

Commentary on draft policies

- 9.52 It is noted in the baseline that the number of school places across Guildford as a whole is tight and, following the peak of births seen in 2012, a number of school expansions have taken place. The vacant places that exist tend to be concentrated in schools in some of the rural areas, with a shortage of primary places in the Guildford Town area. Pressure on places is also anticipated to increase with the introduction of new housing.
- 9.53 The 2017 study Closing the Gap: Trends in Educational Attainment and Disadvantage²² finds that, while there has been some progress in closing the attainment gap it is still the case that persistently disadvantaged pupils end primary school over a year behind their non-disadvantaged peers and are over two years behind by the end of secondary school.
- 9.54 LPSS provides some context in relation to this SA theme. In particular, Policy H1 (Homes for all) directs the majority of student accommodation to purpose built locations, and predominantly on campus. The role of education as a key economic sector (including in rural economies) and business cluster in the Borough is also recognised. The site allocations at Gosden Hill Farm (Policy A25), Blackwell Farm (Policy A26), the former Wisley Airfield site (Policy A35) each seek to deliver new facilities for both primary and secondary education, and contributions to the expansion of Ash Manor Secondary School are also required at the 'land to the south and east of Ash and Tongham (Policy A31).
- 9.55 LPDMP supports these provisions with **Policy ID8** (Community Facilities) which captures educational provisions as key community facilities and supports the appropriate replacement or expansion of them, as well as restricting their loss. The policy also seeks to conveniently locate new facilities to maximise accessibility. This is likely to support educational development and access to education in the long-term, with the potential for minor positive effects.

Appraisal of the Draft LPDMP

- 9.56 The additional policy provisions of Policy ID8 seek to protect existing educational facilities and support their appropriate replacement or expansion. The policy also ensures that new educational facilities will be located to maximise accessibility. Overall **minor long-term positive effects** are anticipated.

Employment land

9.57 Sustainability objective:

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

Commentary on draft policies

- 9.58 The SA objective relating to employment land is predominantly affected by the proposed growth strategy of LPSS which provides for at least 36,100 – 43,700 sq m of office and research and development (B1a and b) floorspace (net); 3.7– 4.1 hectares of industrial (B1c, B2 and B8) land (gross); and approximately 41,000 sq m of comparison retail floorspace (gross) under Policy S2 (Planning for the borough – our spatial development strategy) across a number of sites.

²² Andrews, J., Robinson D., Hutchinson J. Closing the Gap? Trends in Educational Attainment and Disadvantage, August 2017, PP.54, Education Policy Institute. Available at: https://epi.org.uk/wp-content/uploads/2017/08/Closing-the-Gap_EPI-.pdf

- 9.59 Additional proposed policies within LPDMP relating to economic development include **Policy E10** (Rural Development (including agricultural diversification)) and **Policy E11** (Horse-related Development). Policy E10 (Rural Development (including agricultural diversification)) seeks to clarify the types of new buildings or changes of use of buildings and land that the Council would support in principle and facilitate rural development in this respect. Uses supported in principle are identified for both locations within the Green Belt and in the countryside, which in both types of location, may include farm diversification proposals. Whilst the policies do not directly allocate land for such uses, the policies support the facilitation of rural development and minor long-term positive effects are anticipated in this respect.

Appraisal of the Draft LPDMP

- 9.60 Whilst the proposed policies of LPDMP do not directly allocate land for new employment development, the additional provisions of Policies E10 and E11 should help to ensure that targeted new employment land comes forward in the rural area to meet specific needs. Overall **minor positive effects** are anticipated.

Flood risk

- 9.61 Sustainability objective:

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

Commentary on draft policies

- 9.62 Whilst flood risk remains a constraint to development in the Borough, LPDMP does not propose further growth or development that could affect or be affected by flood risk. On this basis, no significant effects are anticipated in relation to this SA objective.
- 9.63 Policy protections in relation to flood risk are largely provided through LPSS, which includes Policy P4 (Flooding, flood risk and groundwater protection zones). The policy provisions require sequential and exception testing in line with NPPF requirements, as well as site-specific flood risk assessment when development is proposed within an area of medium or high risk flooding. Under this policy development is required to consider both flood protection and flood resilience and resistance measures. Proposals within the 'developed' flood zone 3b are restricted in terms of expansion and required to facilitate greater floodwater storage, whilst the 'undeveloped' areas of flood zone 3b is largely safeguarded for flood management purposes.
- 9.64 LPDMP proposes additional policy provisions for the management of surface water, which can contribute to minimising flood risk, particularly in extreme weather events. **Policy P13** (Sustainable Drainage Systems) requires all development proposals "to demonstrate that SuDS have been included from the early stages of site design", further to this "SuDS schemes will be required to satisfy technical standards and design requirements in accordance with Defra's technical standards for sustainable drainage systems". This is echoed through **Policy D13** (Climate Change Adaptation) which requires schemes to "demonstrate adaptation for more frequent and severe rainfall events" through measures which include SuDS and planting and landscaping schemes which maximise absorption and slow down surface water. The additional protection in relation to surface water is considered likely to lead to long-term minor positive effects in relation to flood risk.
- 9.65 Finally, there is potential a tension with **Policy ID11**, which deals with parking standards, in that minimum residential standards are required for residential developments outside of the town centre, potentially leading to increased impermeable hard standing and in turn surface water runoff; however, effects are likely to be quite marginal.

Appraisal of the Draft LPDMP

- 9.66 The additional policy provisions relating to the management of surface water should contribute to minimising flood risk, particularly in extreme weather events. A tension is highlighted in respect of the proposal to support minimum parking standards, but flood risk impacts are likely to be marginal. Overall **minor positive effects** are anticipated.

Health

9.67 Sustainability objective:

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

Commentary on draft policies

- 9.68 Planning for housing and employment development alongside infrastructure and service development provides the opportunity to actively promote social health and wellbeing.
- 9.69 It is recognised that the location of development, as determined through LPSS, bears much influence in terms of; access to healthcare, minimising exposure to key health risks (including poor air quality), reducing inequalities and providing for active and healthy lifestyle choices.
- 9.70 The 2018 SA Addendum Report concluded in relation to LPSS that *“the plan should support good health amongst residents, primarily through supporting walking, cycling and access to open space, and ensuring good access to health services; however, there is some uncertainty given much relies on timely infrastructure delivery. Certain allocations in the Guildford urban area, and more generally plans for a Sustainable Movement Corridor, are positive from a health perspective”*. Significant positive effects were predicted overall, though with some uncertainty.
- 9.71 However, LPDMP broadens policy protections for key facilities that are conducive to health and wellbeing, including open space, community, health and sports facilities. **Policy ID5** aims to provide additional detail and clarity in relation to protecting open space, following on from LPSS Policy ID4 – Green and Blue Infrastructure. The Policy provides protection for existing spaces and identifies that where provision of open space exceeds minimum standards it will not be considered ‘surplus’.
- 9.72 **Policy ID6** (Open Space in New Developments) further sets out open space standards for new residential development in the Borough, with provision requirements increasing as the size of the development increases. The Policy identifies that the strategic LPSS sites are expected to provide for all types of open space (amenity/ natural green space, parks & recreation grounds, children’s play space, youth play space, and allotments). This is supported by quantity and access standards for each typology. The policy clearly identifies the anticipated contributions in the future growth of the Borough and is likely to support minor long-term positive effects for health and wellbeing, not only by providing new space in line with minimum space standards, but also by ensuring that such spaces are with reasonable walking distances. Further to this, Policy ID6 also requires new open spaces *“to be multi-functional spaces that deliver a range of benefits, including biodiversity gains, flood risk improvements, climate change measures and social inclusivity”* and *“support and enhance the existing rights of way network, providing new footpaths and cycle links where possible”* all to the benefit of resident health and wellbeing.
- 9.73 **Policy ID7** (Sport, Recreation and Leisure Facilities) seeks to support development *“that provides, increases or improves opportunities for public sport, recreation and leisure”* and seeks to maximise active travel opportunities to and from such locations. This should provide additional support for healthy lifestyle choices in relation to exercise and physical activity. Community facilities are viewed as integral to promoting healthy, inclusive and safe communities and the support for the retention and enhancement of community facilities provided through **Policy ID8** (Community Facilities) will be beneficial in this respect.
- 9.74 As noted in relation to key services and facilities, the development of active travel networks will also support communities with healthy travel choices, and **Policy ID10** (Achieving a Comprehensive Guildford Borough Cycle Network) aims to *“achieve a comprehensive Guildford Borough cycle network”*. The Policies Map identifies specific routes where the Council will undertake or promote measures to encourage cycling *“including improvements to the safety and convenience of the routes, the designation of cycle tracks, the designation of cycle lanes, and the signposting and the provision of cycle parking facilities”*, and the policy requires consideration of this in all new developments.
- 9.75 **Policy P11** (Air Quality and Air Quality Management Areas) seek to manage and reduce the impacts of poor air quality on resident health. The policy seeks to *“reduce exposure to poor air quality across the borough and improve levels of air pollutants in Air Quality Management Areas”* and *“will only permit development where it will not give rise to adverse impacts on health and quality of life from air pollution.”*

- 9.76 In general, LPDMP also embeds health throughout the policy framework, occurring as a key consideration under most broad themes, including within; ‘protecting’ policies such as for biodiversity, water resources and water quality, soil resources; ‘design’ policies including as part of sustainable and low impact development and in the context of climate change; and ‘infrastructure and delivery’ policies which span community facilities, open space and travel networks. This embedded policy coverage is considered for its long-term positive effects.
- 9.77 Finally, with regards to parking standards (**Policy ID11**), there is potentially a degree of tension associated with the proposed approach, which involves setting of minimum parking standards for residential developments outside of the town centre; however, there is much uncertainty, as discussed in Section 6.

Appraisal of the Draft LPDMP

- 9.78 The draft Plan is recognised for a number of positive impacts in relation to health. Additional policy protections are afforded to key facilities that are conducive to health and wellbeing, including open space, and community, health and sports facilities. Further policy provisions also seek to enhance active travel networks and reduce the impacts of poor air quality on health. This is considered alongside the general approach of embedding health as a key consideration across the policy framework and broad range of policy themes. The proposed policy approach to residential parking standards (minimum standards outside of the town centre) potentially leads to a degree of tension, but this is highly uncertain. Overall **significant positive effects** are anticipated.

Historic environment

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

Commentary on draft policies

- 9.80 The Borough contains a wealth of designated and undesignated assets which contribute to character, sense of place, attractiveness and quality of life. There are over 1,000 Listed Buildings in the Borough as well as over 200 Locally Listed Buildings; many of which form part of one of the 40 Conservation Areas dispersed across the Borough. The Borough further contains 52 Historic Parks and Gardens and 31 Scheduled Monuments, alongside many areas identified as areas of high archaeological potential.
- 9.81 As LPDMP does not propose any further growth sites, there is limited potential for negative effects on designated and non-designated assets, or their settings. However, the draft Plan does propose additional policy protections, which are likely to bring about benefits in relation to the historic environment.
- 9.82 The SA Report for LPSS concludes that site-specific policy mitigation, alongside thematic policy for Guildford Town Centre and that addressing the visitor/ leisure experience largely ensures no significant direct impacts upon the historic environment. **Policy D3** (Historic Environment) identifies that “*the historic environment will be conserved and enhanced in a manner appropriate to its significance*”, expecting “*development of the highest design quality that will sustain and, where appropriate, enhance the special interest, character and significance of the borough’s heritage assets and their settings and make a positive contribution to local character and distinctiveness*”. LPDMP builds on thematic policy with proposed Policies D16 to D20 directly relating to the historic environment, and offering greater protection for designated and non-designated assets, their settings, and archaeology as well as enhanced opportunities to seek positive enhancements in new development.
- 9.83 **Policy D16** sets out “*a positive strategy for the conservation and enhancement of all designated heritage assets*” which includes the requirement for all development proposals affecting designated heritage assets or their settings, “*to be supported by a Statement of Significance and Impact*” proportionate to the assets’ importance. The policy seeks to restrict development that could result in loss of significance, and support enabling development that secures the future conservation of a heritage asset.

- 9.84 **Policy D17** (Listed Buildings) further provides detail for development proposals affecting Listed Buildings, including requirements for any alterations, additional or other works, directly, indirectly or cumulatively affecting the special interest of a Listed Building, and measures to address both climate change adaptation and mitigation in the fabric of such buildings. The detailed policy guidance is not overly-prescriptive, but rather sets out the parameters of what is generally acceptable and what is not, and how any relevant decision-making will be weighted. As a result, minor long-term positive effects are anticipated.
- 9.85 Conservation Areas are afforded greater protections through the provisions of **Policy D18** (Conservation Areas) which seeks to preserve and enhance character and local distinctiveness, ensuring due regard is given to Conservation Area Appraisals, key views and the use of appropriate materials in such areas to maximise the potential for positive contributions in new development. Similarly, **Policy D19** (Scheduled Monuments & Registered Parks and Gardens) seeks to add more operational detail in relation to key designated assets, resisting their loss or development which is detrimental to their significance, and inclusive of the requirement for archaeological evaluation/ assessment where appropriate. **Policy D20** (Non-Designated Heritage Assets) seeks to protect non-designated features “*so that they continue to contribute to the richness of the historic environment*”. The enhanced policy protections and provisions afforded through LPDMP, particularly those for non-designated assets, are considered likely to support the delivery of minor long-term positive effects in relation to the historic environment.

Appraisal of the Draft LPDMP

- 9.86 LPDMP builds on the thematic policy of LPSS to provide greater policy protections for designated and non-designated assets, and their settings, as well as archaeological remains. The policy provisions further seek to identify opportunities to deliver positive enhancements. Overall **minor positive effects** are anticipated.

Housing

- 9.87 Sustainability objective:
- Meet housing requirements of the whole community and provide housing of a suitable mix and type

Commentary on draft policies

- 9.88 The SA objective relating to housing is predominantly affected by the proposed growth strategy of LPSS which, under Policy S2 (Planning for the borough – our spatial development strategy), provides for 562 dwellings per annum over the plan period (2015 – 2034) equating to 10,678 new homes in total.
- 9.89 The provisions of LPSS meet the overall identified housing needs for the borough, and Policy H1 (Homes for all) requires all new residential development “*to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment*” and “*provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location.*” The policy identifies criteria in relation to a broad range of homes; including accessible homes, specialist accommodation, student accommodation, Gypsy, Traveller and Travelling Showpeople pitches and plots, houses in multiple occupation, and self-build and custom housing. This is supported by LPSS Policy H2 (Affordable Homes) which sets out significant requirements for the provision of affordable housing as well as the Council intentions to support increased affordable housing stock, including on public sector-owned land. LPSS Policy H3 (Rural Exception Homes) further supports the delivery of affordable housing at small-scale development locations within the Green Belt.
- 9.90 Provisions of LPSS largely address the SA objective in meeting housing needs and providing a mix of types and tenures. However, LPDMP proposes two further policies which are likely to bring about benefits in relation to housing. **Policy H4** (Housing Density) seeks to maximise densities in the most accessible locations, supporting high levels of accessibility and a reduced need to travel in new developments, and minimising deprivation in this respect. Densities are also required to consider the context and local character of the area, to support the delivery of high-quality housing that is in-keeping in local context and supportive of inclusiveness and identity. **Policy H5** (Housing Extensions and Alterations) also delivers more detailed criteria in relation to housing extensions and alterations to ensure that development is high-quality in design and respectful of its context, and does not impact upon amenity. **Policy H6** (Housing Conversion and Sub-Division) seeks to manage the impacts of housing conversions and sub-divisions on the balance of housing stock. The additional policy provisions support high-quality housing, addressing identified needs in accessible locations and are likely to deliver minor long-term positive effects in relation to this SA objective as a result.

Appraisal of the Draft LPDMP

- 9.91 The two additional policies proposed in relation to housing are considered should support high-quality development, and maximise the delivery of housing in the most accessible locations of the Borough. Overall **minor positive effects** are anticipated.

Land

- 9.92 Sustainability objective:

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

Commentary on draft policies

- 9.93 High-quality agricultural land is a finite resource and LPSS Policy E5 (Rural Economy) identifies that *“agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account.”* However, the SA Report for LPSS still anticipated overall significant negative effects arising from the losses incurred in the site allocations of the Plan. Agricultural resources are unlikely to be further affected in the implementation of LPDMP, which does not seek any additional growth but rather sets a policy framework for the future development of the Borough as established by LPSS. LPDMP does not include any further direct references to agricultural land and as such, it is considered likely to have neutral effects in relation to agricultural land resources.
- 9.94 However, LPDMP does provide direct support for the remediation of despoiled, contaminated or unstable land, with **Policy P10** (Contaminated Land) requiring suitable assessment and remediation where appropriate, and ensuring development avoids *“creating or maintaining linkages between sources of contamination and sensitive receptors.”* As a result, minor long-term positive effects are anticipated in relation to the SA objective.
- 9.95 Finally, there is potentially a tension with **Policy ID11**, which deals with parking standards, in that minimum residential standards are required for residential developments outside of the town centre, potentially leading to more land-take for parking; however, effects are likely to be quite marginal.

Appraisal of the Draft LPDMP

- 9.96 Given that no further growth is proposed or further policy directly relating to agricultural land, neutral effects are anticipated in relation to agricultural land resources; and proposed policy provisions support the remediation of contaminated land. A tension is highlighted in respect of the proposal to support minimum parking standards, but effects in respect of ‘land’ objectives are likely to be marginal. Overall **minor positive effects** are anticipated.

Landscape and townscape

- 9.97 Sustainability objective:

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

Commentary on draft policies

- 9.98 The Guildford Landscape Character Assessment²³ notes the varied and dynamic landscape of the Borough, evidenced by the presence of four different countryside character areas at the national level. The Surrey Hills Area of Outstanding Natural Beauty (AONB) lies within the borough and is a key landscape feature. The Area of Great Landscape Value (AGLV) is also a county-wide environmental designation. There are also 57 separate townscape character areas in Guildford, Ash and Tongham, for which the townscape character has been assessed to have varying strengths of character and condition. They range from historic towns and villages to 20th century industrial/ retail parks.

²³ Guildford Borough Council and Land Use Consultants (2007) Guildford Landscape Character Assessment [online] available at: <http://www.guildford.gov.uk/planningandbuildingcontroldocumentsandpublications>

- 9.99 LPSS provides much context in relation to key landscape designations, with Policy P1 dedicated to the conservation and enhancement of Surrey Hills AONB and AGLV. Policy P2 protects the Green Belt from inappropriate development, which will indirectly contribute to the retention of areas of open countryside that contribute to landscape character, tranquillity and scenic views. Policy P3 also restricts development in the countryside to that which is appropriate and proportionate and “*does not lead to greater physical or visual coalescence*” between settlement areas.
- 9.100 LPSS Policy D1 (Place Shaping) also identifies criteria relating to design and place-shaping, requiring all development to “*achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set.*” The policy creates links to the Design Guide SPD and requires development to consider further aspects such as; a network of green spaces and public spaces; access and inclusion; and infrastructure to create smart places. This will support the conservation and enhancement of the quality and local distinctiveness of townscapes, as well as people’s positive experiences of them.
- 9.101 The 2018 SA Report Addendum for LPSS identified an overall potential for significant positive effects in relation to landscape, concluding that: “*given the extent to which landscape has been applied as a constraint, and recognising that the baseline situation could be one whereby development will come forward in an unplanned way, it is appropriate to conclude significant positive effects*”
- 9.102 Whilst LPDMP does not propose any further policy provisions in relation to designated landscapes, it does seek to provide further detail and clarity in relation to; high-quality design including in village and town centres; the public realm; the riverside; and development in key historic townscape areas.
- 9.103 **Policy D4** (Achieving High-Quality Design and Local Distinctiveness) identifies three aims which directly relate to landscape/ townscape, to; deliver high-quality design across the Borough; protect the character and local distinctiveness of the Borough; and achieve new developments that contribute to and enhance existing character and create distinctive new environments. General principles for design standards are identified, which includes; having due regard to the 2019 National Design Guide; considering opportunities to create site specific identities; and comprehensive and integrated design that delivers well-connected development. Detailed criteria are also proposed in relation to the character of development which includes; consideration of local character and context in design; consideration of “*appropriate scale, height, massing, form, proportions and roof forms*”; high-quality materials and detailing that reflects and reinforces local identity; and protection of key views. Support for key views is also provided through **Policy D5** (Privacy and Amenity) which ensures lighting schemes consider glare and light spillage.
- 9.104 **Policy D6** (Shopfront Design) recognises the impact new or altered shopfronts can have on the appearance, character and vitality of an area and seeks to ensure that shopfronts “*are well designed*” with “*proportioned, and interesting facades*”. This is supported by **Policy D7** similarly outlining criteria relating to advertisements, hanging signs and illumination that seek to minimise impacts on townscapes, and in particular designated historic townscapes such as Conservation Areas.
- 9.105 **Policy D8** (Public Realm) provides detailed requirements for new public realm projects and public art to ensure high-quality townscape environments. The policy aims to ensure development considers distinctive local qualities, identity, and topography, and delivers high-quality design, views and focal points and enhanced access.
- 9.106 The active promotion of riverside development and improvements are also likely to support positive effects in relation to townscape. **Policy D11** (Corridor or the River Wey and Guildford and Godalming Navigation) seeks “*a high-quality of design, both sensitive to and appropriate to, the context and function, and the special historic interest, of the river, its navigation and landscape.*” The policy requires landscape improvements in new development and provision of new native planting schemes, and ensures that “*sensitive levels of lighting are used to retain existing character and to protect amenity, natural habitats and night sky.*”
- 9.107 LPDMP also provides further protection for the existing network of open spaces, and detailed standards for the provision of new open space in development through proposed **Policy ID5** (Protecting Open Space) and **Policy ID6** (Open Space in New Developments). Open spaces will often contribute to landscape and townscape, and more generally sense of place.
- 9.108 Finally, in respect of housing density (**Policy H4**), implications of a flexible criteria-based policy for transport-related greenhouse gas emissions are discussed in Section 6, with the conclusion reached that the proposed policy approach is supported from a landscape perspective given the particular context of Guildford Borough, e.g. in respect of topography.

Appraisal of the Draft LPDMP

- 9.109 Whilst LPDMP does not propose any further policy provisions in relation to designated landscapes, it does seek to provide further detail and clarity in relation to: development density; high-quality design including in village and town centres; the public realm; the riverside; and development in key historic townscape areas; and protection of open spaces. Overall **significant positive effects** are anticipated.

Poverty

- 9.110 Sustainability objective:

- Reduce poverty and social exclusion for all sectors of the community

Commentary on draft policies

- 9.111 The Index of Multiple Deprivation (IMD) seeks to identify where local residents are deprived against measures in relation to income, employment, health, education, housing and crime. The IMD ranks Guildford 204 out of 326 local authorities, with 326 being the least deprived authority. This figure has climbed since 2010, reflecting reduced inequalities overall. However, it is recognised that isolated pockets of relative deprivation still exist across the Borough.
- 9.112 LPSS largely addresses this SA objective through the allocation and distribution of new housing, employment, transport, service, facility and infrastructure development. This includes under Policy H2 a significant proportion of affordable homes in new development of 11 or more dwellings (or 5 or more dwellings in rural areas).
- 9.113 However, the proposed LPDMP policies provide additional support in relation to fuel poverty. Fuel poverty is caused by a combination of high domestic energy consumption and poor energy affordability in low income households. In the Borough, 9.1% of households are in fuel poverty (around 5,100 households), the highest level in Surrey and slightly higher than the average for the South East. Fuel poverty presents a significant risk to human health and life, it is estimated to have contributed to 5,500 excess winter deaths in 2017/18 in England and Wales, and is particularly concentrated in households that rent privately.
- 9.114 Constructing buildings that are energy efficient and supplied by low or zero carbon energy technologies can reduce operational carbon emissions but can also improve energy security and reduce fuel poverty for householders. In this respect the provisions of **Policy D12** (Sustainable and Low Impact Development) seeks to expand on the energy hierarchy consideration by introducing *“an explicit requirement for schemes to follow a low energy design and energy efficient fabric approach to ensure that schemes maximise energy reductions before low carbon and renewable energy technology is considered, in line with the energy hierarchy”*. It also seeks to minimise embodied carbon in construction and at the end of the lifecycle. The measures promote energy efficiency and a fabric first approach are likely to support reduced levels of fuel poverty.

Appraisal of the Draft LPDMP

- 9.115 Whilst the provisions of LPSS predominantly affect this SA objective, the proposed additional measures under Policy D12 for increased energy efficiency and a ‘fabric-first’ approach should support efforts to reduce levels of fuel poverty. Overall **minor positive effects** are anticipated.

Previously developed land

- 9.116 Sustainability objective:

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

Commentary on draft policies

- 9.117 As the growth strategy for the Borough is set through LPSS, and LPDMP does not propose further growth, no significant effects are predicted in relation to this SA objective. The supporting text of LPSS Policy S2 (Planning for the Borough – our spatial development plan) identifies that *“development will be directed to the most sustainable locations, making best use of previously developed land (including in the Green Belt if appropriate).”*

- 9.118 LPDMP does not propose further policy directly relating to this theme. However, minor indirect positive effects may be possible through the inclusion of LPDMP **Policy P10** (Contaminated Land) which by way of setting out the parameters for dealing with contaminated land, may reduce such associated risks with development of previously developed land.

Appraisal of the Draft LPDMP

- 9.119 It is considered overall that this SA objective is predominantly affected by the provisions and allocations of LPSS. No direct effects in relation to PDL can be concluded in implementation of LPDMP, although the policy requirements for contaminated land are noted. **Neutral effects** are predicted overall.

Rural economy

- 9.120 Sustainability objective:

- Enhance the borough's rural economy

Commentary on draft policies

- 9.121 Guildford's attractive countryside, leisure opportunities, heritage and retail offer are crucial to attracting visitors to the borough, and the Rural Economic Strategy²⁴ identifies that approximately 25% of local jobs are located in Guildford's rural wards.
- 9.122 LPSS provides some context with Policy E5 relating directly to the rural economy. The policy identifies that *"the sustainable growth and expansion of all types of business and enterprise in rural areas will be supported"* (provided development is in accordance with the other policies of the plan) and that *"development and diversification of agricultural and other land-based rural businesses will be supported"*. The policy outlines the Council's aims to work with partners to *"support and improve the provisions of internet services where needed in rural areas and enhance digital inclusion in such areas."*
- 9.123 LPDMP seeks to provide additional policy guidance for rural and horse-related development. **Policy E10** (Rural Development (including agricultural diversification)) seeks to clarify the types of new buildings or changes of use of buildings and land that the Council would consider acceptable in principle. Within the Green Belt this includes small-scale sports and recreational facilities as well as conversion of redundant agricultural buildings for small-scale businesses or recreational uses. Within the countryside (outside of the Green Belt) a broader range of uses are identified as potentially acceptable, including farm shops and other farm diversification proposals, tourist accommodation, small-scale rural tourism attractions, small-scale leisure facilities and horticultural nurseries and other small-scale business enterprises. The policy supports a range of appropriate activities which are likely to support rural economies, and minor long-term positive effects are anticipated in this respect.
- 9.124 **Policy E11** (Horse-related Development) seeks to support horse or other equine-related development where appropriate, and to ensure appropriate consideration is given to rural locations, a transport assessment is required under this policy for any such development of a large-scale; ensuring the vitality of the rural economy in the long-term.
- 9.125 The provisions of **Policy D4** (Achieving High-Quality Design and Local Distinctiveness) will also support rural economic performance by retaining and enhancing the character and quality of settlements, including rural and historic areas, to maintain and increase their attraction and offer.

Appraisal of the Draft LPDMP

- 9.126 The additional policy provisions seek to clarify the types of new buildings or changes of use of buildings and land in rural areas, which the Council would consider acceptable in principle. A range of uses are identified which provide support for the rural economy and economic vitality in these areas. Overall **minor positive effects** are anticipated.

²⁴ Guildford Borough Council (2017) Rural Economic Strategy 2017 – 2022 [online] available at: <https://www.guildford.gov.uk/ruraleconomy>

Safe and secure communities

9.127 Sustainability objective:

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

Commentary on draft policies

9.128 Guildford is one of the safest places to live, work and visit in the country, as Surrey has low levels of recorded crime. However, there is a disproportionate fear of crime and concerns about anti-social behaviour in certain parts of Guildford Town Centre. In addition, despite overall low crime rates, there are a small number of hotspots with crime levels amongst the highest in the county. The Safer Guildford Partnership aims to help residents feel safe and be safe in Guildford, by focusing on reducing priority issues of crime and anti-social behaviour in hotspot locations.

9.129 Context in relation to safe and secure communities is provided by LPSS Policy D1 (Place shaping) which seeks to achieve high-quality design that supports safety and natural security with attractive spaces, good enclosure, overlooked streets, and clear interrelationships between land uses and external spaces. The policy expects *“all new development will be designed to ensure it connects appropriately to existing street patterns and creates safe and accessible spaces”*. Further to this, the policy outlines the expectation that *“all new development will be designed to reduce opportunities for crime and antisocial behaviour”*. The policy directly seeks to create and maintain safer and more secure communities, addressing the identified SA objective in large part.

9.130 LPDMP provides minor additional support for this SA objective in relation to improving the quality of where people live and work, with a number of additional design policies proposed, including in relation to the public realm. **Policy D4** (Achieving High-Quality Design and Local Distinctiveness) seeks to deliver high-quality design which protects the character and local distinctiveness. The policy expects development to *“be inclusive, integrated and accessible for all occupants now and in the future”* and *“promote safer streets and public areas and pedestrian friendly spaces.”* Public realm development is required under **Policy D8** (Public Realm) to be *“robust and user friendly for all, and create varied and attractive environments and spaces where people want to be, and to contribute to”*. The policy provisions are considered for their potential to support long-term minor positive effects.

9.131 Proposed Policy D10 (‘Agent of Change’ and Noise Impacts) further seeks to ensure that new development successfully integrates with existing businesses, community facilities and ‘noise-sensitive’ uses such as residential uses. Proposed Policy D10 would require, where appropriate, Noise Impact Assessment to *“clearly identify the likely effect levels from, or on, existing uses nearby to the proposed development as a result of the proposal, including the potential adverse effect that they may have on the new existing residents or users.”* The policy provides clear mitigation requirements that will ensure that no significant effects arise in relation to the impact of noise on communities.

Appraisal of the Draft LPDMP

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

Transport

9.133 Sustainability objective:

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

Commentary on draft policies

9.134 It is considered that this SA objective is largely influenced by the directions and policy provisions of LPSS, which distributes the overall level of growth across the Borough and contains more policies directly relating to this theme. The Local Plan also sits alongside Surrey County Council’s Local Transport Plan (LTP) as a key planning document for transport and infrastructure development.

- 9.135 In the context of these documents an emphasis on improved sustainable transport connections is provided. The delivery of two new rail stations and a 'Sustainable Movement Corridor' as proposed through LPSS will deliver significant transport improvements and encourage the use of more sustainable modes, including active travel. These provisions sit alongside the growth strategy of LPSS which seeks to maximise sustainable transport access and (through an effective spatial strategy) reduce the need to travel.
- 9.136 LPSS SA Addendum concluded that *“whilst transport/ traffic constraints are widespread across Guildford Borough, it is apparent that the spatial strategy has been developed in order to reflect variations in constraint and opportunity, most notably through focusing growth at locations along a Sustainable Movement Corridor in the urban area of Guildford, and at locations in proximity to a rail station.”* No significant effects were predicted.
- 9.137 Whilst LPDMP does not propose additional growth, it does propose additional policy provisions which are likely to benefit transport infrastructure and accessibility. **Policy ID10** (cycle network) seeks to *“achieve a comprehensive Guildford Borough cycle network”* as mapped through the Policies Map which identifies specific routes along which improvement measures will be implemented. This includes improvements to the safety and convenience of the routes, the designation of cycle tracks, the designation of cycle lanes, and the signposting and provision of cycle parking facilities. The measures seek to support the uptake of more sustainable modes of travel and are likely to lead to positive effects accordingly.
- 9.138 **Policy ID11** (Parking Standards) seeks to identify maximum parking standards in the town centre and minimum standards across the rest of the Borough, as well as standards for non-residential development; which is likely to support the Council aims of minimising negative effects associated with localised traffic congestion within and surrounding development sites. This is supported by **Policy H4** (Housing Density) which directly seeks to maximise densities in the most accessible locations, supporting high levels of accessibility and a reduced need to travel in new developments. See further discussion in Section 6.

Appraisal of Draft LPDMP

- 9.139 The proposed LPDMP policy provisions are likely to deliver additional benefits in relation to transport. This includes the identification and promotion of a comprehensive and connected cycle network for the Borough and policy measures which seek both directly and indirectly to maximise densities in the most accessible location of the Borough (the town centre). The measures seek to support the use of sustainable modes of transport and as a result **minor positive** effects are anticipated overall.

Vibrant communities

- 9.140 Sustainability objective:

- Create and sustain vibrant communities

Commentary on draft policies

- 9.141 Community facilities are viewed as integral to promoting healthy, inclusive and safe communities in line with paragraph 91 of the NPPF. The Council have already planned and made provision for required key supporting infrastructure with its partners, such as Surrey County Council. This includes for the delivery of a range of community facilities, including new and expanded schools, health care facilities and other community uses, catering for planned growth and needs in the borough.
- 9.142 Context is provided by LPSS, and Policy H1 (Homes for all) sets out to ensure new development provides a mix of housing tenures/ types/ sizes, with a view to meeting the accommodation needs established by the latest Strategic Housing Market Assessment (SHMA), recognising that *“sufficient housing to meet the needs of the borough’s population will ensure that the borough thrives, with mixed, balanced communities”*.
- 9.143 LPSS Policy ID1 (Infrastructure and delivery) seeks to ensure the timely provision of suitable, adequate infrastructure recognising that historically infrastructure provision and upgrading has not always kept pace with the growth of population, and some infrastructure is currently at or near to capacity, or of poor quality. The policy is clear that: *“where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused.”* The Infrastructure Delivery Plan that supports this Plan focuses on a range of types of infrastructure, including GPs and dental surgeries, hospital and community health care, libraries, cemeteries, and sports facilities. Further to this, Policies E7 - E9 (Retail and Service Centres) set out to ensure a hierarchy of retail and service centres, of differing scale and functions, that complement one another and meet the needs of communities.

- 9.144 LPSS SA Report Addendum (2018) concluded that “*Assuming appropriate phasing of infrastructure delivery alongside housing growth (as required by Policy ID1), the plan should lead to a situation whereby development leads to ‘sustainable’ new communities and also wide ranging benefits to existing communities (e.g. in respect of secondary school provision). Having said this, it is recognised that some aspects of the strategy are less than ideal, and many uncertainties exist, including in respect of traffic congestion.*” Significant positive effects were predicted, though with some uncertainty.
- 9.145 LPDMP seeks to enhance policy provisions relating to communities, but also recognises that local communities are often best placed to identify buildings or land that furthers their social wellbeing or social interests as well as neighbourhood infrastructure needs. In this regard, area and neighbourhood infrastructure needs may be set out in Neighbourhood Plans.
- 9.146 **Policy ID8** (Community Facilities) which captures key community facilities and supports the appropriate replacement or expansion of them, as well as restricting their loss. The policy also seeks to conveniently locate new facilities to maximise accessibility. This is supported by the provisions of **Policy ID5** which provides protection for existing spaces and identifies that where provision of open space exceeds minimum standards it will not be considered ‘surplus’. Policy ID9 (Retention of Public Houses) further seeks to retain pubs where they are recognised as viable and of value to the community.
- 9.147 **Policy ID6** (Open Space in New Developments) further sets out open space standards for new residential development in the Borough, with provision requirements increasing as the size of the development increases. The Policy identifies that the strategic LPSS sites are expected to provide for all types of open space (amenity/ natural green space, parks & recreation grounds, children’s play space, youth play space, and allotments). This is supported by quantity and access standards for each typology. The policy clearly identifies the anticipated contributions in the future growth of the Borough and is likely to support minor long-term positive effects for communities, not only by providing new space in line with minimum space standards, but also by ensuring that such spaces are with reasonable walking distances.
- 9.148 Further to this, **Policy ID6** also requires new open spaces “*to be multi-functional spaces that deliver a range of benefits, including biodiversity gains, flood risk improvements, climate change measures and social inclusivity*” and “*support and enhance the existing rights of way network, providing new footpaths and cycle links where possible*” all to the benefit of all communities. Open space and community facilities are viewed as integral to promoting healthy, inclusive and safe communities and the support for the retention and enhancement of community facilities provided through the proposed infrastructure delivery policies will be beneficial in this respect.
- 9.149 The development of active travel networks will also support communities with improved travel choices, and **Policy ID10** (Achieving a Comprehensive Guildford Borough Cycle Network) aims to “*achieve a comprehensive Guildford Borough cycle network*”. The Policies Map identifies specific routes where the Council will undertake or promote measures to encourage cycling “*including improvements to the safety and convenience of the routes, the designation of cycle tracks, the designation of cycle lanes, and the signposting and the provision of cycle parking facilities*”, and the policy requires consideration of this in all new developments.
- 9.150 The provisions of **Policy D4** (Achieving High-Quality Design and Local Distinctiveness) will also support community vitality by retaining and enhancing the character and quality of key town and service centres to maintain and increase their attraction and offer. The provisions of **Policy D11** (Corridor of the River Wey and Guildford and Godalming Navigation) also support the aims of the Guildford Town Centre Regeneration Strategy; specifically seeking “*publicly accessible riverside walkways and/ or cycle routes to enhance the vitality of the riverside*” to the benefit of local communities.

Appraisal of Draft LPDMP

- 9.151 LPDMP views open space and community facilities as integral to promoting healthy, inclusive and safe communities and the support for the retention of viable community facilities, including pubs, provided through the proposed infrastructure delivery policies will be beneficial in this respect. This is considered alongside measures to improve accessibility and deliver high-quality design supportive of community vitality. As a result, **minor positive effects** are anticipated overall.

Waste

9.152 Sustainability objective:

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

Commentary on draft policies

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

9.154 LPDMP supports the objectives of the Surrey Waste Plan through the identification of the intrinsic links between development design and waste. **Policy D12** (Sustainable and Low Impact Development) requires significant development proposals (with an estimated cost of £400,000 or more) to be accompanied by a Site Waste Management Plan to be submitted within or alongside the sustainability statement/ sustainability information.

Appraisal of Draft LPDMP

9.155 The SA objective will be largely influenced by the directions of the Surrey Waste Plan, and LPDMP supports the objectives of the Surrey Waste Plan through the provisions of Policy D12 ensuring that major development fully considers its impact in relation to waste generation and waste management. As a result, **minor positive effects** are anticipated overall.

Water quality

9.156 Sustainability objective:

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

Commentary on draft policies

9.157 Water quality is intrinsically linked with a number of the other SA themes, including water resources, flood risk, biodiversity, health, and community wellbeing. The Borough has an extensive and varied water environment, including numerous aquifers, rivers, lakes, ponds, reservoirs and aquifer protection zones. Maintaining and enhancing the quality of these water resources is important to help retain these essential sources of water supply. Additionally, the maintenance of a high-quality water environment is also valuable for general amenity and recreational resources. The draft Plan recognises that *"the protection of the water environment is particularly important within the borough as the quality of groundwater resources are easily polluted, directly and indirectly, and can pose a serious risk to public health."*

9.158 The River Wey is the main waterbody within the Plan area, and much of the river currently achieves 'moderate' status, with some tributaries currently achieving only 'poor' or 'bad'. The River Wey directly upstream from the Borough is largely 'poor' quality status. The draft River Wey Catchment Plan²⁵ identifies high levels of phosphate (both from wastewater treatment and other sources) and fish as the predominant issues affecting the waterbodies that form the river. The Wey Fishpass and Wetland Delivery Project (WeyFWD) has been developed to deliver prioritised fish passage solutions which will contribute to alleviating some of these issues and support movement of the River towards 'good' ecological status.

9.159 Groundwater presents an important consideration for development proposals, with approximately 30 per cent of the borough located on principle aquifers and the presence of 14 source protection zones (SPZ). Flooding can also significantly affect water quality and flood schemes such as habitat restoration and barrier removal are identified for their potential to deliver multiple benefits for flood risk, biodiversity and water quality.

9.160 LPDMP does not propose any further growth to that outlined through LPSS, and development itself is considered likely to be the greatest impact on water quality in terms of land take, water resources and any further modification to waterbodies, flood risk and pollution. In this respect, no significant negative effects are anticipated in the implementation of LPDMP.

²⁵ Wey Landscape Partnership (2018) Draft River Wey Catchment Plan [online] available at: https://surreynaturepartnership.files.wordpress.com/2018/05/wlp-catchment-plan_sert_draft-v3.pdf

- 9.161 LPSS contains policy provisions to support water quality. In particular **Policy P4** (Flooding, Flood Risk and Groundwater Protection Zones) requires development within Groundwater Source Protection Zones and Principal Aquifers to have no adverse impact on the quality of the groundwater resources and to not put at risk the ability to maintain a public water supply. **Policy ID4** (Green and Blue Infrastructure) also seeks to ensure that development proposals comply with the Water Framework Directive in relation to water quality.
- 9.162 LPDMP proposes further policy protections for water quality that are likely to deliver minor long-term positive effects. **Policy P12** (Water Resources and Water Quality) seeks to ensure that “*opportunities to improve water quality are used wherever possible*” and development will not cause unacceptable deterioration to water quality or have an unacceptable impact on “*the quality of surface or groundwater bodies*”. The policy further requires “*new development that is likely to have an impact on underground or surface water bodies covered by the Water Framework Directive and the South East River Basin Management Plan to contribute towards though water bodies maintaining or achieving ‘Good Ecological Status’*”.
- 9.163 **Policy P13** (Sustainable Drainage Systems) requires development proposals to “*demonstrate that SuDS have been included from the early stages of site design*” and the support for appropriate surface water management is likely to indirectly benefit water quality, particularly in extreme weather events and flash flooding.

Appraisal of Draft LPDMP

- 9.164 LPDMP proposes additional policy protections directly relating to maintaining and improving water quality. The additional policy provisions for suitable management of surface water are also considered for minor indirect positive effects, particularly in extreme weather events and flash flooding. As a result, **minor positive effects** are anticipated overall.

Water resources

- 9.165 Sustainability objective:

- Achieve sustainable water resources management and water conservation

Commentary on draft policies

- 9.166 The region is identified as an area under severe water stress, which is considered likely to worsen given climate change forecasts and population increases. Thames Water manage water resources within Guildford, and their latest Water Resources Management Plan²⁶ (WRMP) identifies one of the key measures to reduce consumption will be promoting through promoting water efficiency in the region. The WRMP further recognises the need to increase water supplies through new groundwater resources and reservoirs as well as new water transfers.
- 9.167 LPDMP does not propose any further growth that could place increased pressures upon maintaining adequate water supplies, however the draft Plan does include additional policy provisions which can support the delivery of positive effects.
- 9.168 The context is set by LPSS which has identified through adopted Policy D2 (Climate change, sustainable design, construction and energy) a requirement for “*water efficiency that meets the highest national standard*” in the design and construction of development. This is supported by proposed LPDMP **Policy P12** (Water Resources and Water Quality) which requires developers to demonstrate that it will not cause unacceptable deterioration to the flow or quantity of groundwater, and supports appropriate “*development or expansion of infrastructure associated with water supply, surface water drainage and wastewater treatment facilities*”. This is alongside the provisions of proposed LPDMP Policy D12 (Sustainable and Low Impact Development) which expects “*all development proposals to incorporate measures to harvest and conserve water resources and, where possible, incorporate water recycling/ reuse*”. The policy provisions are likely to support the objectives of the WRMP in promoting water efficiency, and the provisions further maximise opportunities to enhance water resource infrastructure. Combined, the policy provisions therefore have a high potential for minor long-term positive effects in relation to water resources.

²⁶ Thames Water (2019) Shape your water future: Our updated revised draft water resources management plan 2019 [online] available at: <https://corporate.thameswater.co.uk/about-us/our-strategies-and-plans/water-resources>

Appraisal of Draft LPDMP

- 9.169 Overall, the policy provisions of LPDMP enhance the provisions of LPSS by providing further protection for groundwater resources and supporting enhanced water resource infrastructure provisions. On this basis, **minor positive effects** are anticipated overall in relation to water resources.

Overall conclusions on the Draft LPDMP

- 9.170 LPDMP is an extension to LPSS in that it seeks to deliver a supporting policy framework for the provisions and allocations established in LPSS. LPDMP does not propose any additional growth or site allocations which significantly reduces the potential for negative effects.
- 9.171 Overall the LPDMP is predicted to result in wide-ranging positive effects, although these are predicted to be 'minor' other than in respect of biodiversity (given the proposed approach in respect of biodiversity net gain requirements) and health (numerous proposed policies will act cumulatively in support of good health).
- 9.172 The appraisal does not predict negative effects in respect of any sustainability objective; however, uncertain effects are concluded in respect of climate change mitigation objectives. There is inherent uncertainty given the Government's recent consultation on setting new national sustainable design and construction standards, and the appraisal also highlights a degree of tension resulting from the LPDMP proposed approach to housing density (flexible criteria-based) and support for minimum parking standards outside of the town centre.
- 9.173 Moving forward, the Council should take account of the appraisal findings presented within this section alongside responses received as part of the current consultation, when preparing the final draft 'proposed submission' version of the LPDMP. Specifically, the Council should seek to address the uncertainties highlighted in respect of climate change mitigation (also other minor 'tensions' discussed within the appraisal text) and seek to ensure that the predicted positive effects are further enhanced.

Part 3: What are the next steps?

10. Plan finalisation

Publication of the Proposed Submission LPU

- 10.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of LPDMP for publication under Regulation 19 of the Local Planning Regulations 2012. The Proposed Submission LPDMP will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission LPDMP will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.
- 10.2 The SA Report will be published alongside the Proposed Submission LPDMP. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

- 10.3 Once the period for representations on the Proposed Submission LPDMP / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether LPDMP can still be deemed 'sound'. If this is the case, LPDMP will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.4 At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to LPDMP these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.5 Once found to be 'sound' LPDMP will be formally adopted by the Council. At the time of adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

11. Monitoring

- 11.1 The SA Report must present 'measures envisaged concerning monitoring'.
- 11.2 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
 - Air quality;
 - Biodiversity net gain;
 - Housing densities;
 - Residential parking.

Appendix I: Regulatory requirements

As discussed in Chapter 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report (N.B. this current report is not the SA Report, but aims to present the information required of the SA Report nonetheless); however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Questions answered by this SA Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	The environmental characteristics of areas likely to be significantly affected	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	
(i) a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

i.e. answer - *What's the scope of the SA?*

Table C presents a discussion of more precisely how the information within this report reflects the SA Report requirements (N.B. to reiterate this report is not the SA Report).

Table C: ‘Checklist’ of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 (‘What’s the plan seeking to achieve’) presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report, which was updated post consultation and is now available on the website.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an ‘SA framework’, and this is presented – in an updated form - within Section 3 (‘What’s the scope of the SA’).
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance...;	Messages highlighted through context and baseline review are also presented within Appendix II.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined in order to establish an ‘SA framework’.</p> <p>The SA framework is presented within Section 3. Also, messages from context review are presented within Appendix II.</p> <p>With regards to explaining “<i>how... considerations have been taken into account</i>”, Section 7 explains the Council’s ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).</p>
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings (in relation to three key plan issues), whilst Section 9 presents an appraisal of the Draft Plan. All appraisal work naturally involved giving consideration to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	A range of recommendations are made as part of the draft plan appraisal presented in Section 9.

Regulatory requirement	Information presented in this report
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Sections 4 and 5 deal with ‘reasons for selecting the alternatives dealt with’, with an explanation of reasons for focusing on certain issues / options. Also, Section 7 explains the Council’s ‘reasons for selecting preferred options’.</p> <p>Methodology is discussed at various places, ahead of presenting appraisal findings.</p>
<p>i) description of measures envisaged concerning monitoring in accordance with Art. 10;</p>	<p>Section 11 presents measures envisaged concerning monitoring.</p>
<p>j) a non-technical summary of the information provided under the above headings</p>	<p>The NTS is a separate document.</p>
<p>The SA Report must be published alongside the draft plan, in-line with the following regulations</p>	
<p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>This Interim SA Report is published alongside the Draft Plan, in order to inform the current consultation and next steps.</p>
<p>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</p>	
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>This Interim SA Report will be taken into account when preparing the Proposed Submission Plan, alongside consultation responses received on the Draft Plan and this Interim SA Report.</p>

Appendix II: The SA Scope

This appendix supplements Section 3 by presenting information from the Scoping Report (2019). Specifically: Table A presents key issues in respect of each of the sustainability topics that comprise the SA framework; and Table B presents the SA objectives alongside associated appraisal questions / prompts. N.B. topics are grouped by type rather than listed in alphabetical order (the approach taken elsewhere in this report).

Table A: Key issues and opportunities

Topic	Significant issues identified	Evolution in the absence of the Plan
Air quality	<ul style="list-style-type: none"> • Since the publication of the last SA Scoping report in 2013, two AQMAs were declared in the period 2017-2019. • A reduction in NOx emissions is required to achieve the annual mean objective value of 40 µg/m3. • New development will lead to increased car use and congestion leading to localized air quality issues. • Adverse economic, social and environmental impacts of high traffic volumes and a culture of dependence on private car use including recurrent traffic congestion on certain parts of the network at certain times of day, road collisions, community severance, obesity, noise pollution, local air pollution, greenhouse gas emissions, high demand for parking, and amenity of local neighbourhoods. 	<p>Without additional measures to tackle the issue of air quality in the AQMAs, the level of NO2 concentrations may not improve in the future. The AQMAs in the borough will be dealt through measures and objectives set out in the adopted AQMP (2019).</p> <p>The recent national policies and the emergence of new technologies are likely to improve air pollution, for example, through cleaner fuels/energy sources, and the shift towards electric and low emissions vehicles is likely to gather pace over the plan period. However, the development of new housing across the borough will inevitably result in a higher number of cars on the roads. The Plan can provide an opportunity to contribute to improved air quality in the borough through the sustainable siting of development and the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations and inclusion of a DM policy dealing with tackling NO2 emissions in the AQMAs.</p>
Natural capital and natural environment	<ul style="list-style-type: none"> • Protecting green spaces and erosion of valued natural places as a result of increased pressure for housing and associated transport. • Protecting and enhancing priority habitats and species in accordance with Surrey Nature Partnership targets. • Potential loss of biodiversity as a result of increased pressure for development to accommodate demand for housing. • Large areas of the borough are covered by biodiversity designations, including internationally important SPAs, 	<p>New development and associated traffic growth and congestion may cause air pollution hence causing negative effects on air and water quality leading to deterioration of natural and built environment. In the absence of the Plan, the issue of potential biodiversity loss as a result of new development would be addressed through adopted policy "ID4: Green and blue infrastructure". However, there may not be an opportunity to meet the requirements of meeting quantified set percentage target of biodiversity net gain as set out in the new legislation. Because of Green Belt, there may be increased pressure to develop areas of relative biodiversity outside of the settlement boundaries, with possible impacts to habitats and species of local and national importance. Opportunities to provide a mechanism to manage the effects of undirected development, such as disturbance to habitats and species,</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
	<p>nationally important SSSIs, SACs, SNCIs, and ancient woodland.</p> <ul style="list-style-type: none"> • Out of a total 404 priority species of national conservation concern, 31.2% are already extinct locally, while 37.1% are threatened and/or remain in worrying decline. This only leaves the remaining 31.7% presently considered stable or recovering. • Huge numbers of Surrey's trees fall outside woodlands and here remain vulnerable to indiscriminate removal • Habitat decline from lack of management and developing woodland. • Sites provide habitat for ground nesting birds and are sensitive to visitor pressure. • Invasive species, fire risk, flooding 	<p>inappropriate use of land and impacts from pollution and water run-off may be missed. However, by allocating sufficient land the LPSS 2015-2034 should guard against this development pressure.</p> <p>Increased development will put pressure to use areas of green space for development purpose, severing corridors and reducing quality and quantity of natural environment and connectivity between areas green space. Existing policies are not considered to provide an appropriate scale of guidance for the management of potential contamination, pollution, habitat fragmentation, management of priority habitats and priority species as a result of new development.</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
<p>Climate change</p>	<ul style="list-style-type: none"> • The impacts of climate change will not be equal or fair, and are likely to increase existing inequalities. • The flood events are likely to become more common therefore flood risk management should be considered in Guildford. • CO₂ emissions per capita are 5.3 tonnes and are still higher than per capita CO₂ emissions for Surrey, the South East region and England, with 5.2, 4.8 and 5.1 tonnes respectively. • Predicted droughts will have implications for biodiversity as well as water supplies. • Summer overheating potentially contributing to heat-related health problems. • Climate change may alter the impact that agriculture and forestry have on the natural environment and the value of the ecosystem services provided. 	<p>In the absence of the Plan, climate change effects will continue including increased temperatures, severe storms and flooding. The effects of climate change will not be experienced equally. The issue of overheating in buildings as a result of rising temperatures may not be sufficiently addressed as existing Building Regulations in the UK do not have a minimum standard for decrement delay so the decision to design with overheating in mind rests solely with us.</p> <p>Closing the performance gap between design intent and regulatory requirement is likely to become an important issue over the next decade if we are to deliver the climate and environmental targets related to buildings and the new Plan can address through inclusion of relevant DM policies, that will provide specific details and thus add certainty to the developer of the Councils expectations of how the requirements stipulated in Policy D2 can be met.</p> <p>Additional policies may be required to ensure that new development is to mitigate its impact on climate change by reducing embodied CO₂ emissions and using resource efficiency and low impact construction techniques and thus reducing the impact on the environment, society, economy and climate change, by promoting high standards for thermal performance and energy efficiency, the up-take of low carbon energy, and water efficiency incorporating sustainable drainage measures and sustainable design.</p> <p>Without a Plan, an opportunity to provide clarity and direction on the location of potentially suitable sites for large-scale renewable energy development without compromising the value of sensitive landscape may not be explored.</p> <p>Introduction of further measures for water conservation will be missed and no due consideration will be given to the risks of wildfire.</p>
<p>Sustainable transport and accessibility</p>	<ul style="list-style-type: none"> • Car ownership is high and the percentage of people travelling to work by car or van appears to have increased substantially. 	<p>In the absence of the Plan, the opportunity to maximise the use of the sustainable transport modes of walking, cycling, and the use of public and community transport, and opportunities for people with disabilities to access all modes of transport will be realised through <i>Policy ID3: Sustainable transport for new developments</i>. Although the site allocations and the proposals in the LPSS will provide opportunities to use active modes and may result in a</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
	<ul style="list-style-type: none"> Public transport has a poor reliability rate compared to national averages. Many key roads and junctions in the wider area suffer from severe congestion and long journey times. This also affects the quality of public transport provision. Local accessibility issues especially affect people who experience social exclusion, with linked issues related to personal security, cost, lack of easy-to-understand travel information and reliability of services. Adverse economic, social and environmental impacts of high traffic volumes and a culture of dependence on private car use including recurrent traffic congestion on certain parts of the network at certain times of day, road collisions, community severance, obesity, noise pollution, local air pollution, greenhouse gas emissions, high demand for parking, and amenity of local neighbourhoods. According to the Defra's noise map data, noise levels on the A3 running through Guildford are excessive on some sections of the road and its vicinity and can potentially have impacts on human health. 	<p>modest modal shift over the period to 2034, there will be still an absolute increase in overall traffic volumes. Accordingly, schemes to increase highway capacity and improve road safety were included in the LSPP in order to mitigate the principal adverse material impacts of this forecast growth in traffic volumes. AECOM SA Report (2017) found that: 'Whilst transport/traffic constraints are widespread across Guildford Borough, it is apparent that the spatial strategy has been developed in order to reflect variations in constraint and opportunity, most notably through focusing growth at locations along a Sustainable Movement Corridor in the urban area of Guildford, and at locations in proximity to a rail station. Policy commitments regarding the phasing of infrastructure are also of critical importance.'</p> <p>Without the Plan, preventive measures of noise pollution in combating noise-induced health hazards may not be fully explored.</p>
<p>Economic competitiveness and employment</p>	<ul style="list-style-type: none"> The availability of employment sites is an issue for the borough. The cost and availability of housing influences where people live, where they work and the availability of local labour. This is already adversely affecting some of the businesses in the borough and increasing congestion as more people are travelling longer distances to work in the borough. Broadband and the need for higher internet speeds is as a key priority for businesses across the borough, from rural to town centre businesses where access to increased 	<p>In the absence of the Plan, it is assumed that relevant policies in the current Local Plan and National Planning Policy would apply. It is uncertain how the job market will change without the implementation of the Plan, particularly given the uncertainties posed by Brexit.</p> <p>Policy E3 of the Local Plan: Strategy and Sites (LPSS) 2015 – 2034 addresses the availability of employment sites by designating several Strategic and Locally Significant Employment Sites, which are priority locations for the development of further Use Class B1-B8 employment uses in line with their designation (as per LPSS policy E2). Employment uses on these sites are also protected against change of use to other non-employment uses. The LPSS also allocates mixed-use sites that include a requirement for employment floorspace and one site specifically for employment uses; these sites will also increase the amount of land available for new businesses or business relocation and expansion.</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
	<p>speeds is necessary to perform at the cutting edge of the business innovation.</p> <ul style="list-style-type: none"> • There are pockets of disadvantage and concentrations of people on low incomes, in receipt of benefits and with no or low qualifications, with some areas being amongst the most deprived in Surrey • The borough experiences high levels of traffic congestion in the town centre and on major routes during peak hours. This is a concern for local businesses and residents. • Unemployment levels are low but there is an increasing trend and pockets of higher unemployment in deprived areas. • Uncertainty associated with the effect Brexit will have on Guildford economy. 	<p>Policy E5 of the LPSS provides a positive framework to promote economic growth in rural areas and avoid stifling opportunities, however some additional detailed enabling policy wording may still be beneficial to stimulate and develop the rural economy, encourage innovative projects and capitalise on opportunities to diversify the economic activities of existing businesses in these areas.</p>
Flood risk	<ul style="list-style-type: none"> • Some areas of the borough, including Guildford town centre, are at risk of fluvial and surface water flooding. • Over recent years the borough has witnessed more frequent flooding. • New developments typically introduce impermeable surfaces, which may increase the speed and amount of surface water run-off and can exacerbate flooding. 	<p>The issue of flooding is addressed through the existing Local Plan policies ID4 and P4. However, in the absence of the Plan, additional measures to adapt to potential impacts of climate change the resilience of new development will not be realized to accommodate the risks of flooding, i.e. reducing surface water runoff by prioritizing the use of permeable surfaces; green infrastructure and sustainable drainage systems as appropriate in accordance with Policy ID4.</p>
Geology and soils	<ul style="list-style-type: none"> • The majority of the agricultural land within the borough is classified as Grade 3 (a or b) and 4 (lower quality) with small pockets of Grade 2. • Contamination issues may arise on previously developed sites. 	<p>Development is likely to take place on previously developed sites to the extent possible, given the promotion of such through national policy. However, the supply of previously developed sites is likely to decline over time as more are developed and therefore greenfield sites are likely to be required.</p> <p>The proportion of high-quality agricultural land within the borough is relatively small and therefore it is unlikely that this will be at risk from development, given that there is a higher proportion of land that is classified as being of lower quality.</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
Historic environment	<ul style="list-style-type: none"> Reducing the amount of designated assets that are at risk. Preventing loss or damage of designated assets. Some designated assets are still at risk from neglect, decay or inappropriate development. 	<p>The number of Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and Historic Parks and Gardens means that much of the borough’s character and distinctive built heritage will continue to be conserved and protected from future development. However, if development of these sites (or in their setting) does occur, dependent on form and design, the cultural heritage interests could potentially be affected.</p> <p>In the absence of the Plan, some designated assets may still be at risk from neglect, decay or inappropriate development.</p>
Housing to meet the needs of the population	<ul style="list-style-type: none"> There is an ongoing shortage of affordable housing, particularly for first time buyers. High average house prices create affordability problems for local people, first time buyers and essential key workers. The number of overcrowded households in Guildford has significantly increased. There is a deficit in affordable housing supply and the current completion rate is below the annual level required to address the deficit. The need for accommodation for people with care and support needs is likely to increase, given the projected increases in population and the proportion of older people in the borough. Achieving balance between sustainable higher density developments and the impact of density and development on the character of local areas. 	<p>Without the Plan, it is likely that house prices will continue to rise across the County. The population of the borough is expected to increase in future years. This is likely to exacerbate current shortages of housing and increase housing need. Furthermore, the need for affordable housing for local people unable to compete in the open market is likely to continue to be unmet. The issue of overcrowding and affordability ratio will worsen. This is a problem shared by the rest of the South East region. However, the LPPS offers opportunity to facilitate and expedite the delivery of affordable housing across the borough. LPSS 2015-2034 intends to meet projected need and addresses affordable housing issues thus aiming to address the aforementioned issues.</p>
Population, poverty and social inclusion	<ul style="list-style-type: none"> Population increases and are likely to place additional pressure on house prices and availability. The age structure of the borough will require continued monitoring as age shifts will have long term implications for health care needs, housing mix and other social services. 	<p>In the absence of the Plan, there will be less opportunity to plan positively to reduce deprivation and improve social inclusion. Disparities in deprivation are going to increase. Food poverty has economic, social, and health impacts and there is a need to tackle the root cause of food poverty and insecurity in the borough.</p> <p>The population in Guildford is predicted to increase to just over 162,900 in 2041 and with more elderly people living in the area due to longer life expectancy and in-migration there will be an increased demand on health and social support services. Whilst the LPSS allocates some sites for care homes and supports specialist accommodation – it doesn’t set</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
	<ul style="list-style-type: none"> Some pockets of deprivation persist; there is a negative trend of increased disparities across the wards pointing to a widening inequality. Food and fuel poverty and insecurity are issues that need priority action. Crime rates are up in Guildford, with Guildford town centre having the highest proportion of reported crimes. There is a need to reduce the inequalities gap between those living in the most and least deprived parts of Guildford. Food poverty is a growing issue across the borough. The population of Guildford is highly qualified compared to the regional and national averages however the gap between national and regional averages is lessening. 	<p>targets to meet the full identified need. It also requires a percentage of accessible homes on sites of 25+ homes.</p> <p>Without initiatives to develop more vocational courses and job specific qualifications the disparity between those with qualifications and those without will remain.</p> <p>Without the Plan, it is likely that the gap between the most and least deprived areas in Guildford will continue to widen.</p>
Materials, waste and water resources	<ul style="list-style-type: none"> There is an identified need to reduce the proportion of waste sent to landfill and increase the proportion of waste that is recycled and composted. There is an ongoing need to continue to focus on reducing Local Authority Collected Waste (LACW) in line with waste prevention which sits at the top of the waste hierarchy. Given climate change forecasts and population increases, water shortage will be very an important issue in our borough in the plan period. 	<p>The issue of the efficient use of materials, water and waste recycling will be addressed through existing policies adopted in the Plan, e.g. D2 (d) which requires development to meet the highest national standard, currently “optional requirement” described in Building Regulation 36 2(b). However, relying only upon the existing policy may not provide enough encouragement for all development proposals including conversions, extensions and changes of use to incorporate facilities to recycle, harvest and conserve water resources.</p> <p>Neither there would be sufficient encouragement on how to facilitate circular economy systems to support sustainable and low impact development.</p>
Water quality	<ul style="list-style-type: none"> River quality is generally poor and showed no signs of improvement since the last SA report published in 2013. Some WFD objectives can only be delivered via catchment wide/cross-boundary planning. Much of the River Wey in the borough currently achieves ‘moderate’ status, with some tributaries achieving only ‘poor’ or ‘bad’. 	<p>In the absence of the Plan, there will be reliance on developers entering discussion with the Environment Agency at planning application stage and the existing Local Plan Policies ID4 and P4.</p> <p>New development is likely to cause an increase in run-off and potential contamination and disruption of flows for surface water and groundwater. Without additional policies the current</p>

Topic	Significant issues identified	Evolution in the absence of the Plan
	<ul style="list-style-type: none"> Certain types of development pose risks to ground and surface water quality. 	<p>water quality status of the River Wey may not improve and further even worsen due to pressure from development.</p>
<p>Health and health Inequalities</p>	<ul style="list-style-type: none"> Considerable differences between wards in life expectancy for both men and women, although with such small areas there is uncertainty about the precise estimate. Adult and child obesity is an issue; since 2014 obesity and excess weight rates are 13.5% higher in deprived wards than the average Surrey ward. One in four adults drinks alcohol above sensible levels; this places Guildford in the top ten council areas nationally for hazardous drinking. The number of adults with a learning disability in Guildford was 2,824 in 2017, and was the highest among the neighbouring local authorities. This is projected to increase to 3,085 people with a learning disability and 1,307 people with autism by 2030. Of these, an estimated 597 adults have a moderate or severe learning disability (143 of whom have a severe learning disability) and this is estimated to increase to 152 by 2030. There is an under supply of the majority of open space typologies across the majority of the wards, most notably youth provision. Deficiencies in open space provision have a disproportionate effect on certain groups, i.e. lone parents, families with children under 5. In Guildford Borough 5.7 per cent of deaths of those aged 25 years and over arise from long-term exposure to anthropogenic particulate air pollution. Low levels of physical activity. Rising fuel poverty from 8.0 per cent in 2012 to 9.1 per cent in 2016, the highest among the neighbouring authorities. Rising food poverty in the borough. 	<p>In the absence of the Plan, it is assumed that relevant policies in the current Local Plan and National Planning Policy would apply.</p> <p>Demands on healthcare in the borough will increase due to a growing population and an increasing elderly population. The issue of rising obesity, fuel and food poverty may not be adequately addressed through current policies in existing Plan.</p> <p>The existing lack of open space provision in most deprived areas will likely to further exacerbate deprivation and health inequalities. Lack of opportunities to address deficiencies in open space provision in wards with high level of deprivation, i.e. Westborough, Ash Vale and Worplesdon will not specifically addressed.</p> <p>An opportunity to specify that the provision of adequate open space to provide health related Interventions, particularly within the wards which are the public health focus may not be explored.</p> <p>In the absence of the Plan, an opportunity for the Council to adopt a <i>health in all policies approach</i> supported by integration of impacts on human health in the SA framework may be missed. The opportunity to provide a foundation for delivery of activities and services that maintain and improve the health and well- being of our communities may not be fully explored. This can be achieved through inclusion of a DM policy that seeks to improve health and address health inequalities.</p>

Table B: The SA framework

SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
Social			
<i>Population Housing</i>	1. To meet housing requirements of the whole community and provide housing of a suitable mix and type	<ul style="list-style-type: none"> Contribute to the supply of housing? Reduce homelessness? Contribute to meeting demand for a range and mix of housing including affordable housing and specialist housing? Contribute to the delivery of sustainable homes? Support those with disabilities? 	<ul style="list-style-type: none"> Housing affordability as a function of lower quartile income to lower quartile house price (this should decrease, i.e. become more affordable) Completion rates of affordable housing in new developments (this should increase) Housing completions that provide for long- term care and disability (this should increase) Number of planning permissions for student accommodation Number of pitches or plots granted planning permission for Gypsy and Traveller Affordable housing register (this should decrease)
<i>Population Human health</i>	2.To facilitate improved health and well-being of the population, enabling people to stay independent and reducing inequalities in health	<ul style="list-style-type: none"> Improve access to health facilities and social care services? Include policies that promote “health in all policies” approach, clearly referring to health and wellbeing as an outcome? Reduce human exposure to air pollution from traffic emissions? Contribute towards reduction of inequalities in health outcomes and strive to improve the overall physical and mental health and wellbeing of the borough? Deliver sufficient community and cultural facilities and services to meet local needs, with particular focus on wards with poorest health outcomes including Stoke, Westborough and Ash Wharf or other priority wards? Avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development? Encourage healthy lifestyles and takes into account priorities set out in Guildford and Surrey Health and Wellbeing Strategies? Avoid locating development in locations that could adversely affect people’s health? 	<ul style="list-style-type: none"> Healthy Life expectancy (number of years living in a good state of health) (this should increase) Proportion of population in full-time care Proportion of population that is over retirement age Condition of residents’ general health (Census - QS302EW) Number of noise complaints received by Environmental Health Number of large developments completed a Health Impact Assessment
<i>Population Human health Crime and safety</i>	3. To create and maintain safer and more secure communities and improve	<ul style="list-style-type: none"> Promote access to safe, inclusive and accessible, open spaces, in particular for women and children, older persons and persons with disabilities? Reduce crime/ fear of crime and anti-social activity? 	<ul style="list-style-type: none"> Level of recorded crime and anti-social behaviour Number of new developments achieving the ‘Built for Life’ quality mark (this should increase)

SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
	the quality of where people live and work	<ul style="list-style-type: none"> Promote design that incorporate the principles of safe design to reduce the risk and fear of crime, e.g. natural surveillance, appropriate levels of lighting? 	<ul style="list-style-type: none"> Percentage of the district's population having access to an Open Space within 400 metres of their home Hectares of Open Space per 1,000 population Change in the amount of Open Space (Natural England)
<i>Population Economy and employment</i>	4. To reduce poverty and social exclusion for all sectors of the community	<ul style="list-style-type: none"> Reduce poverty and social exclusion in those areas most affected? Reduce food and fuel poverty Promote development that benefit Guildford's most deprived areas? Support the changing population profile of the area? Encourage engagement/participation in community/cultural activities? Contribute to regeneration activities? Enhance the public realm? 	<ul style="list-style-type: none"> Long term unemployment rate Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country (Index of Multiple Deprivation) Proportion of population in food and fuel poverty (this should decrease)
<i>Population Equalities</i>	5. To create and sustain vibrant communities	<ul style="list-style-type: none"> Facilitate the integration of new communities with existing communities by delivering a mix of supporting/other uses alongside housing development? Encourage and support diverse town centre uses? 	<ul style="list-style-type: none"> Borough demographics – proportion of the population likely to need long-term care Changes to IMD (reductions in the most deprived and difference in the proportion of the highest to the lowest levels of deprivation) (the gaps between deprived areas should decrease)
<i>Population Education</i>	6. To improve levels of education and skills in the population overall	<ul style="list-style-type: none"> Support the provision of an adequate range of educational and child care facilities on where they are needed? Provide for new and improved education and training facilities leading to a work ready population of school and college leavers? 	<ul style="list-style-type: none"> GCSE and equivalent results for young people (Department for Education) % of working age population with NVQ level 4+ or equivalent qualification (Census 2011 - QS501EW) Qualifications at all ages (this should increase)
Economic			
<i>Population Economy Employment</i>	7. To maintain Guildford borough and Guildford town's competitive economic role	<ul style="list-style-type: none"> Improve business development and enhance competitiveness? Encourage economic investment and regeneration to create jobs in Guildford's more deprived communities? Promote growth in key sectors? Make land available for business development? Increase the range of employment opportunities, shops and services available in town, district, local centres? 	<ul style="list-style-type: none"> Estimated new job creation (ONS Business Register Employment Survey (BRES)) Business formation rate (ONS) (business start-ups) Numbers employed by industry (ONS BRES) Percentage of A1 use class and vacant units in town/district/local centres (Council records)

SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
		<ul style="list-style-type: none"> Will it decrease the number of vacant units in town, district, local centres? 	<ul style="list-style-type: none"> Overall position / rank of the borough in the UK Competitiveness Index (this should increase) Overall position / rank of Guildford town in the UK Competitiveness Index (this should be maintained/improved)
Population Economy Employment	8. To facilitate appropriate development opportunities to meet the changing needs of the economy	<ul style="list-style-type: none"> Encourage the development of new businesses in new and growth sectors? Provide for the types of homes and cultural attractions that will attract and retain global talent? Allow for sufficient flexibility to respond to uncertainties and changing economic circumstances? Support the growth and creation of SMEs? Provide for the needs of the economy, especially local business? 	<ul style="list-style-type: none"> Ratio of median salary in the borough compared to median national salary (NOMIS) Percentage of permitted and completed class B1a and B1b floorspace (Council records) Percentage of permitted and completed class B1c, B2 and B8 floorspace
Population Economy Employment	9. To enhance the borough's rural economy	<ul style="list-style-type: none"> Encourage rural diversification? Encourage indigenous business? Facilitate achievement of objectives set out in Rural Economic Strategy 2017 – 2022? Encourage inward investment? 	<ul style="list-style-type: none"> Net change in floor space in rural areas (this should increase)
Population Material assets	10. To ensure that the digital infrastructure available meets the needs of current and future generations	<ul style="list-style-type: none"> Improve digital infrastructure provision? Will it increase opportunities to improve the digital economy? 	<ul style="list-style-type: none"> Average broadband speed (OFCOM)
Environmental			
Soil	11. To minimise the use of best and most versatile agricultural land (BVAL) and encourage the remediation of contaminated land	<ul style="list-style-type: none"> Minimise loss of best and most versatile agricultural land to development? Maintain and enhance soil quality? Prevent land contamination and facilitate remediation of contaminated sites? Help to remediate contaminated sites and where possible carry this out on-site? Prevent soil erosion? 	<ul style="list-style-type: none"> Number of potential and declared contaminated sites returned to beneficial use Change in recorded soil quality (EA)
Material assets Waste	12. To reduce waste generation and achieve	<ul style="list-style-type: none"> Promotes sustainable use of materials and natural resources? Reduce household waste generated/head of population? 	<ul style="list-style-type: none"> Estimated household waste produced (Council records)

SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
<i>Soil</i>	the sustainable management of waste and materials	<ul style="list-style-type: none"> Reduce construction and demolition waste Increase rate/head of population of waste reuse and recycling? 	<ul style="list-style-type: none"> Estimated quantity of household waste recycled (Council records) (this should increase)
<i>Materia assets</i> <i>Soil</i>	13. To make the best use of previously developed land and existing buildings	<ul style="list-style-type: none"> Prioritise the development of brownfield land over greenfield land? Encourage the re-use of existing buildings? 	<ul style="list-style-type: none"> Percentage of development recorded on greenfield/brownfield land (Council records)
<i>Biodiversity</i> <i>Flora</i> <i>Fauna</i>	14. To conserve and enhance biodiversity, geodiversity and the natural environment	<ul style="list-style-type: none"> Maintain and enhance International and national nature conservation sites? Maintain and enhance locally designated biodiversity assets, taking into account the impacts of climate change? Maintain and enhance ancient woodlands, meadows and other characteristic habitats, taking into account the impacts of climate change? Achieve overall measurable net gains in biodiversity? Conserve, connect and enhance ecological networks, taking into account the impacts of climate change? Protect, enhance or extend designated geological sites? Assist species, particularly Surrey priority species, to adapt to the anticipated effects of climate change (i.e. through connecting habitats and/or improving greenspace)? Help to achieve goals set out in 25 Year Environment Plan²⁷ targets and actions of the Surrey Nature Partnership²⁸? 	<ul style="list-style-type: none"> Change in the number and area of designated ecological sites (NE) Change in the number and area of designated ecological sites (NE) Recorded status/condition of designated and local ecological sites (NE) Recorded visitor numbers on designated European sites (NE) Gains in biodiversity provided by development on sites of 25 homes or greater Net gains in biodiversity measured using Defra Biodiversity Metric 2.0. The amount of Green and Blue Infrastructure that is protected and provided within the borough Number of hectares of Priority Habitat created or enhanced Number of Biodiversity Opportunity Areas (BOA) objectives achieved.
<i>Air</i> <i>Transport and accessibility</i>	15. To encourage the use of sustainable forms of transport (walking, cycling, bus and rail)	<ul style="list-style-type: none"> Support the maintenance and expansion of high-quality public transport networks? Help to address road congestion, particularly involving HGVs on the routes into Guildford Town Centre? Enhance connectivity of the sustainable transport network and provide new cycling and walking infrastructure? Facilitate the take up of low/zero emission vehicles? Reduce air and noise pollution from traffic? 	<ul style="list-style-type: none"> Percentage mode share for sustainable modes, defined as walking, cycling, bus, minibuss, coach and train, as methods of travel to work, for all usual residents aged 16 to 74 in employment in Guildford borough (using Census data) (this should increase). Developments with Travel Plans. Travel to work distances (Census) Travel to work modes (Census)

²⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

²⁸ https://surreynaturepartnership.files.wordpress.com/2019/10/biodiversity-planning-in-surrey-revised_post-revision-nppf_mar-2019.pdf

SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
<i>Air</i>	16. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure	<ul style="list-style-type: none"> • Help to achieve national and international standards for air quality? • Reduce the number of people exposed to levels of NO₂ concentrations that exceed 40µg/m³? • Avoid exacerbating existing air quality issues in designated AQMAs? • Contributes to achievement of targets and actions specified in Guildford Borough Council Air Quality Action Plan (AQAP) 2019? 	<ul style="list-style-type: none"> • Concentrations of air pollutants • NO_x, PM₁₀ and PM_{2.5} emissions from road transport (they should decrease) • Number of people exposed to levels of NO₂ concentrations that exceed 40µg/m³ (this should decrease) • Number of AQMAs revoked (Council records) • Number of AQMAs declared • Number of targets and actions achieved in AQAP
<i>Historic environment</i>	17. To protect, enhance, and where appropriate make accessible, the archaeological and historic environments and cultural assets of Guildford, for the benefit of residents and visitors	<ul style="list-style-type: none"> • Protect and enhance buildings, monuments, sites, places, areas and landscapes of heritage interest or cultural value (including their setting) meriting consideration in planning decisions? • Protect and enhance sites, features and areas of archaeological value in both urban and rural areas? • Enhance accessibility to and the enjoyment of cultural heritage assets? • Provide opportunities to enhance the historic environment? 	<ul style="list-style-type: none"> • Change in the number of designated and non-designated heritage assets (Historic England, Council records) • Number of heritage assets recorded as 'at risk' (Historic England, Council records) • Area of historic parks and gardens • Number of Scheduled Monuments (SMs) damaged as a result of development • Number of listed buildings and buildings at risk
<i>Climatic factors</i>	18. To mitigate the causes of climate change through reducing emissions of greenhouse gases and efficient use of natural resources	<ul style="list-style-type: none"> • Promote energy efficient design? • Reduces CO₂ emissions from buildings? • Reduce energy consumption? • Encourage the provision of renewable energy infrastructure where possible? • Minimise greenhouse gas emissions from transport? 	<ul style="list-style-type: none"> • Average energy consumption/carbon emissions per household (reduction in energy consumption/emissions to reach UK average) • MWs of installed small scale low and zero carbon energy capacity (Council records) (increase in capacity to reach UK average) • Low and zero carbon decentralised energy networks (this should increase)
<i>Climatic factors</i>	19. To build resilience and adapt to the impacts of climate change and extreme weather events such as flood, drought and heat risks particularly on groups more vulnerable to the effects of climate change	<ul style="list-style-type: none"> • Minimise the impact of overheating of urban areas and buildings, with particular references to buildings designed for vulnerable users such as hospitals, elderly care homes and schools? • Help in protecting the community from the increased extremes of weather, which are projected to occur more often with climate change (heat waves, drought and flooding)? 	<ul style="list-style-type: none"> • Number of developments with measures to address overheating • Number of planning application granting permission in flood risk areas against the EA advice

SEA Directive topics	SA objectives	Guide questions (Does the Plan...)	Potential monitoring indicators
<i>Climatic factors</i>	20. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	<ul style="list-style-type: none"> • Minimise the risk of flooding from rivers and watercourses? • Promote the use of SuDS and flood resilient design? 	<ul style="list-style-type: none"> • Number of planning applications approved in Flood Zone 3 and 2 • Number of major schemes incorporating SuDS mechanisms
<i>Landscape</i>	21. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	<ul style="list-style-type: none"> • Conserve and enhance the character of AONBs including its setting? • Protect the special views into and out of Guildford town centre? • Promote high quality design that responds to the distinctive local character? • Safeguard the character and distinctiveness of Guildford's settlements? 	<ul style="list-style-type: none"> • Amount of new major development in the AONB on sites not allocated in the Plan (Council records)
<i>Water</i>	22. To maintain and improve the water quality of the borough's rivers and groundwater	<ul style="list-style-type: none"> • Support the achievement of Water Framework Directive Targets? • Maintain and improve ground water quality? • Maintain and improve the quality of inland waters? • Reduce the amount of nitrates / phosphates entering the water environment? 	<ul style="list-style-type: none"> • Ecological and chemical water quality of rivers, canals and freshwater bodies (these should improve) (EA) • Quality and quantity of groundwater • Number of planning applications, of a potentially contaminating nature within a Source Protection Zone (SPZ) • Number of planning applications which require contaminated land remediation
<i>Water</i>	23. To achieve sustainable water resources management and water conservation	<ul style="list-style-type: none"> • Encourage water to be stored for re-use? • Promotes water conservation measures? • Promote sustainable use of water? • Maintain water availability of water dependent habitats? 	<ul style="list-style-type: none"> • Water cycle studies • Abstraction license data • Water use, availability and proportions recycled