

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

SA Report  
Non-technical Summary

December 2021

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# Introduction

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

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

SA is a legally required 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.

Central to the SA process is preparation of an SA Report for publication alongside the Draft Plan. At the current time an SA Report is published for consultation alongside the 'pre-submission' version of the LPDMP. This is the SA Report Non-technical Summary (NTS).

## Structure of the SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point**?

- including in relation to 'reasonable alternatives'.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What's the scope of the SA ?*

## What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list indicates parameters appraisal and provides an appraisal 'framework'.

The SA framework is presented within the table below. Further information on the SA Scope is available within the Scoping Report (2019).

*The SA framework*

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

# Plan-making / SA up to this point

## Overview

An important element of the required SA process involves assessing 'reasonable alternatives' in time to inform development of the plan, and then publishing information on reasonable alternatives for consultation alongside the plan.

As such, Part 1 of the main report explains work undertaken to develop and appraise a 'reasonable' alternative policy approaches in respect of three key policy areas:

- **Biodiversity net gain**

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

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

- **Built environment decarbonisation**

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

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

- **Parking standards**

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

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

## Alternatives appraisal findings

Appraisal findings in respect of these three sets of alternatives are presented across the three tables below. With regards to appraisal methodology:

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** (negative effect) and **green** (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, and '?' where there is too much uncertainty to reach a conclusion.

*Biodiversity net gain*

Topic	Option 1	Option 2	Discussion
Air quality	=	=	<p>As per the equivalent discussion in 2020, there are clear biodiversity arguments for seeking to go beyond the nationally prescribed minimum approach. Firstly, this is on the basis of rates of biodiversity loss in Surrey.<sup>1</sup> Secondly, there are naturally concerns regarding the BNG approach failing to achieve stated biodiversity objectives, and perhaps even resulting in perverse long-term effects that are currently difficult to foresee or fully appreciate, because approaches and methods are in their infancy, and recognising that a focus on BNG will be, to some extent, at the expense of a focus on more traditional approaches to biodiversity conservation and enhancement. The 2020 Interim SA Report discussed a concern that a 10% net gain requirement could be “within the margin of error”, such that it doesn’t deliver “real benefits” in practice.<sup>2</sup> At the current time, the Biodiversity Metric 3.0 is a proactive and positive step, and progress on bringing forward effective LNRSSs, both nationally and locally, is very encouraging; however, ze Ermgassen et al. (2021) highlight some significant concerns, including around a piecemeal approach whereby the combined effect is less than the sum of its parts. Biodiversity must be considered at landscape scales and with a long-term perspective, hence it is important that BNG approaches lend support to strategic initiatives, and certainly do not distract from, or lessen the focus on, such initiatives. On one hand, this lends support for requiring a higher (20% net gain figure). On the other hand, in the GBC context there is likely to be relatively good potential for strategically targeted offsite measures given experience of SANG delivery to ensure effective avoidance and mitigation of recreational impacts to the Thames Basin Heaths SPA; for example, there is a long standing relationship with the Land Trust. Whilst there are tensions between SANG objectives (focused on access) and BNG objectives, and there is a need to ensure ‘additionality’ if and when SANG is used to secure biodiversity credits (i.e. interventions must be additional to what would not have happened in any case), there is cautious optimism regarding the potential for effective and efficient implementation of BNG in the GBC context.</p> <p>With regards to non-biodiversity objectives, the first point to consider is whether and to what extent there is a risk of 20% BNG leading to a cost on the development industry that reduces funds available for measures focused on the achievement of non-biodiversity objectives, or perhaps even a situation whereby development becomes unviable. These matters have been examined through the LPDMP Viability Assessment, which concludes that the package of DM policy requirements tested, including 20% BNG, is acceptable in viability terms; however, for the purposes of this appraisal, it is appropriate to flag a risk of some residual issues or impacts. Whilst there is little or no certainty, it is appropriate to flag a particular concern regarding affordable housing delivery, which can be, and often is, a matter for negotiation at the development management stage on viability grounds. Whilst affordable housing delivery is currently strong – as measured against policy requirements – this situation could change in the future, if the housing market were to weaken, plus there is a need to consider implications of First Homes policy. A further consideration is whether a 20% BNG policy could</p>
Biodiversity	<b>2</b>		
Climate change adaptation	=	=	
Climate change mitigation	=	=	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	=	=	
Health	=	=	
Historic environment	=	=	
Housing		<b>2</b>	
Land	=	=	
Landscape and townscape	=	=	
Poverty	=	=	
Previously developed land	=	=	

<sup>1</sup> This is a key reason why a [Surrey Nature Partnership Position Statement](#) recommends 20% BNG. However, it is recognised that there is a need to apply caution when comparing rates of biodiversity loss at national and local levels; for example, a species could become locally extinct whilst populations remain relatively healthy at the national scale.

<sup>2</sup> See [cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf](#)

Rural economy	=	=	<p>disproportionately affect the viability of smaller sites, which are important from a perspective of meeting housing delivery targets and housing needs in rural areas, and importantly support SME house builders. Disproportionate impacts are not envisaged, but there is an element of residual risk, ahead of BNG approaches and methods maturing.</p> <p>Finally, as per the equivalent discussion in the 2020 Interim SA Report, there is a need to recognise that an ambitious approach to BNG will also translate into additional ecosystem service benefits to communities, for example in terms of recreation and flood risk. Work nationally to explore how to take the step from a BNG approach to an environmental net gain (ENG) approach has continued since the time of the 2020 consultation; for example, Natural England published a beta Environmental Benefits from Nature (EBN) tool in July 2021;<sup>3</sup> also, CIEEM has advocated for ENG.<sup>4</sup> However, even if the focus is on BNG, as opposed to wider (and far more complex) ENG, there will still be wider ecosystem service benefits (albeit recognising that there can also be tensions between achieving biodiversity and wider ecosystem service benefits).</p> <p>In conclusion, an ambitious approach to BNG is supported in respect of the majority of objectives, although there is an element of risk in respect of housing and employment land objectives. Risks are uncertain as current understanding is that a 20% requirement would not lead to an unacceptable financial burden on the developer. With regards to effect significance, it is possible to predict likely significant positive effects under Option 2 in respect of biodiversity, with other effects much more uncertain and likely to be of lower significance.</p>
Safe / secure communities	=	=	
Vibrant communities	=	=	
Waste	=	=	
Transport	=	=	
Water quality	=	=	

**Built environment decarbonisation**

Topic	Option 1	Option 2	Discussion
Air quality	=	=	<p>The Future Homes Standard (FHS) consultation document (2019) set out that the Government’s preferred approach, in respect of an interim uplift to Building Regulations, ahead of a further uplift to the FHS, was to require a 31% reduction in emissions compared to the requirements set out in the current Building Regulations. This preferred option was recently confirmed by the Government’s response to the consultation (2021); however, the uplift timetable remains unclear or, at least, is feasibly subject to delay. As such, there is an argument for requiring ‘a 31% reduction’ through LPDMP policy, as a failsafe against any delay to the Building Regulations uplift. Also, it is appropriate to plan proactively for the 31% uplift now, to ensure that additional cost implications can be absorbed without an undue effect on meeting other LPDMP policy requirements and, in turn, achieving wider Local Plan and wider sustainability objectives. Perhaps most notable, amongst the non-decarbonisation focused objectives that represent a competing priority for developer funding, is affordable housing.</p> <p>As such, it is difficult to argue against Option 2, given that it is the Government’s preferred option. It is difficult to suggest any concerns around development viability, or the capacity of the building industry to deliver the 31% uplift in an effective way (e.g. without corners being cut</p>
Biodiversity	=	=	
Climate change adaptation	=	=	
Climate change mitigation	2	1	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	=	=	

<sup>3</sup> See [ecosystemsknowledge.net/Environmental-Benefits-from-Nature](https://ecosystemsknowledge.net/Environmental-Benefits-from-Nature)

<sup>4</sup> CIEEM explain: “Whilst it might seem that both developers and ecologists are still getting to grips with Biodiversity Net Gain (BNG) and offsetting, it is clear that the direction of policy travel in several territories around the world is towards utilising a wider Environmental Net Gain (ENG) approach... This has recently been reinforced by the Natural Capital Committee: “The government should urgently replace biodiversity net gain with environmental net gain, ensuring this applies to all nationally significant infrastructure and the marine environment. Delivery of net zero will become incredibly difficult, if not impossible, without environmental net gain – it is the only approach that considers the impact on the terrestrial and marine ecosystems, including biocarbon stocks.” See <https://cieem.net/i-am/influencing-policy/strategic-policy-sub-committee/environmental-net-gain/>

Health	=	=	<p>/ poor practice, e.g. measures being installed with low capital cost but with higher running costs, or air tightness measures that lead to ventilation issues), because the requirement is set to come into force nationally in the near future, and the conclusion of Government is that a 31% uplift is achievable and viable now. In turn, it is difficult to suggest logic to Option 1 as a short term stop-gap to the Building Regulations being uplifted to require a 31% reduction.</p> <p>Also, it is important to recall that under Option 2 there would be flexibility in how the requisite emissions reduction is achieved. The UKGBC is notable for calling for a major focus on energy efficiency measures ahead of low and zero carbon technologies (typically rooftop solar PV and heat pumps), but there are concerns regarding industry capacity and viability (e.g. thicker walls impact layouts).</p> <p>In conclusion, Option 2 is the preferable option from a decarbonisation perspective. The equivalent appraisal at the Regulation 18 stage suggested that Option 1 was preferable in terms of 'housing' objectives, particularly affordable housing objectives, but it is now not at all clear this is the case, with uncertain effects predicted on balance. The views of the development industry will be welcomed through the forthcoming consultation.</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>
Historic environment	=	=	
Housing	?	?	
Land	=	=	
Landscape and townscape	=	=	
Poverty	=	=	
Previously developed land	=	=	
Rural economy	=	=	
Safe / secure communities	=	=	
Vibrant communities	=	=	
Waste	=	=	
Transport	=	=	
Water quality	=	=	

*Parking standards*

Topic	Option 1	Option 2	Discussion
Air quality	2	★1	<p>There are arguments for restricting car parking from a decarbonisation perspective, and also potentially from a health perspective, which might potentially be achieved through Option 2, through a focus on spatially defined maximum and expected standards, over-and-above Option 1.</p> <p>Specifically, restriction of parking spaces can stimulate modal shift away from use the private car towards use of active (walking, cycling) and public (buses, trains) modes of transport. It can also be suggested that restricted parking might lead to more land being made available for other uses, which could lead to benefits in respect of other sustainability objectives.</p> <p>However, it is a challenge to conclude benefits with confidence. This is because residents might respond to a restricted number of parking spaces by parking on-roads, which can also cause problems in respect of localised traffic congestion and impacts to the urban realm. Whilst design and enforcement (such as yellow lines) can provide mitigation, residual impacts can include:</p> <ul style="list-style-type: none"> <li>• Air quality – increased stop-start leads to increased air pollution.</li> <li>• Climate change mitigation – on-road parking can pose problems for bus movements and also dissuade cyclists.</li> <li>• 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.</li> <li>• Historic environment – on-road parking can impact on the urban realm, potentially with implications for the setting of historic assets.</li> </ul>
Biodiversity	=	=	
Climate change adaptation	=	=	
Climate change mitigation	2	★1	
Digital infrastructure	=	=	
Economy	=	=	
Education	=	=	
Employment land	=	=	
Flood risk	2	★1	



Health	2	★1	<p>A further key concern with overly restricted parking is insufficient parking in more rural areas leading to a situation whereby residents struggle to access services and facilities and employment. Under Option 2 there could feasibly be a risk of expected standards leading to over-restriction in some cases (given data limitations, and the fact that rural accessibility can change over time, e.g. local services and facilities can be lost). However, these concerns are uncertain, including as the planning application process allows planning decisions to take into account material considerations which could include such factors.</p> <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> <p>This discussion has so far served to highlight quite wide-ranging benefits associated with Option 2. Other benefits of setting spatially defined maximum and expected standards, as opposed to more 'blanket' minimum standards, relate to ensuring efficient use of land and minimising impermeable surfaces.</p> <p>However, under Option 2, it will be important to ensure that expected standards are not set too high such that opportunities for low-car development outside of the urban area and strategic sites are unduly restricted. It will also be important to ensure that maximum standards are set suitably low within the urban area and for strategic sites, perhaps most notably those strategic sites linked to the Guildford Sustainable Movement Corridor and/or set to support higher densities.<sup>5</sup></p> <p>In conclusion, Option 2 is supported in respect of a range of objectives. The only identified concerns relate to the possible risks of overspill parking taking place on-street – which could result in localised traffic and impacts to the urban realm, and accordingly on air quality, climate change mitigation, safe/secure communities, and historic environment - and under-provision of parking in villages and the rural area, which could impact resident access to services, facilities and employment. However, there is little reason to conclude any significant concern, including on the basis of the proposal that Neighbourhood Plan parking standards take precedence (other than for strategic sites). Significant effects are not predicted.</p>
Historic environment	?	?	
Housing	=	=	
Land	2	★1	
Landscape and townscape	=	=	
Poverty	=	=	
Previously developed land	=	=	
Rural economy	?	?	
Safe / secure communities	=	=	
Vibrant communities	=	=	
Waste	=	=	
Transport	2	★1	
Water quality	=	=	

### Reasons for selecting the preferred option

The following sections present the response of GBC officers to the three alternatives appraisal tables.

#### Biodiversity net gain

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

<sup>5</sup> To be clear, the Parking SPD sets numerical standards on non-resi sites. Numerical standards for strategic sites are in an appendix of the LPDMP. Standards are set at, or rounded up from, observed average car availability (by location, household size and type of dwelling (flat/house)). Census data was obtained and analysed at LSOA level to calculate these averages. The policy also sets out instances where low-car development is acceptable and measures to aid delivery of low car/car free development. However, as the standards in village/rural areas are expected standards, some flexibility could be allowed based on local conditions.

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

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

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

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

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

### Built environment decarbonisation

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

### Parking standards

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

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

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

# Appraisal of the LPDMP

Part 2 of the SA Report presents an appraisal of the Pre-submission LPDMP as a whole. The appraisal is presented as a series of narratives under the 'SA framework' topic headings, with each narrative leading to an overall conclusion. The overall conclusions are presented below.

## Air quality

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

## Biodiversity

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

## Climate change adaptation

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

## Climate change mitigation

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

## Digital infrastructure

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

## The Economy, rural economy and employment land

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

## Education

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

## Flood risk

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

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## Health

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

## Historic environment

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

## Housing

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

## Land

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

## Landscape and townscape

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

## Poverty

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

## Previously developed land

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

## Safe and secure communities

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

## Transport

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

## Vibrant communities

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

## Waste

The LPDMP supports the objectives of the Surrey Waste Plan through the provisions of Policy D12 ensuring that major development fully considers its impact in relation to waste generation and waste

management, as well as Policy D5a (External Servicing Features and Stores), which seeks to support household and business recycling rates. As a result, minor **positive effects** are anticipated overall.

## Water quality

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

## Water resources

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

## Overall conclusions on the Draft LPDMP

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

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

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

## Next Steps

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

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

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

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

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

At the current time, in-light of the assessment findings presented above in respect of the Draft Local plan, it is suggested that monitoring might focus on: Air quality; Biodiversity net gain; Housing densities; and Residential parking.