

14 December 2022

Stuart Harrison  
Planning Policy Manager  
Planning Services  
Guildford Borough Council  
Millmead House  
Millmead, Guildford  
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Dear Stuart

**Sustainability Appraisal and Habitats Regulations Assessment with respect to Main Modifications to the Guildford Local Plan: Development Management Policies (LPDMP) (Local Plan part 2)**

Following Guildford Borough Council's receipt of Main Modifications (MMs) to the LPDMP from the Planning Inspectorate, we have reviewed these and concluded that no further Sustainability Appraisal or Habitats Regulations Assessment work is necessary given the scope of the MMs.

Sustainability Appraisal

The Government's planning practice guidance (PPG) advises that *"It is up to the plan-making body to decide whether the sustainability appraisal report should be amended following proposed changes to an emerging plan"*<sup>1</sup> (NB the sustainability appraisal report prepared for the LPDMP is available [here](#)). The PPG advises that *"If the plan-making body assesses that necessary changes are **significant**, and were not previously subject to sustainability appraisal, then further sustainability appraisal may be required and the sustainability appraisal report should be updated and amended accordingly"*<sup>2</sup> (emphasis added). In this case, the changes to the plan provided by the MMs are not considered significant and no further Sustainability Appraisal work is considered necessary.

We note the amendment to Paragraph (4) of Policy D14: Carbon Emissions from Buildings, which deletes policy that is now a requirement under Building Regulations, as of June 2022. Specifically, the new Regulations deliver a 27% carbon reduction for non-residential, and 31% reduction for residential, over the previous Regulations.

Habitats Regulations Assessment

With respect to Habitats Regulations Assessment (HRA), it is necessary to review the MMs to confirm that they will not introduce any new likely significant effects on Habitats Sites (Special Areas of Conservation, Special Protection Areas, and Ramsar Sites) that were not investigated as part of the HRA for the LPDMP (NB the HRA report for the LPDMP is available [here](#)). Following a review of the MMs, it can be concluded that they will not lead to likely significant effects on Habitats Sites, alone or in combination with other plans and projects, and do not undermine the conclusions of the HRA for the LPDMP. This is because none of the amendments promote or seek to deliver development but are rather about development management and in particular adding clarity to the policies in the submission version of the LPDMP.

Note that the content of this letter should be considered an Addendum to the HRA of the LPDMP. As such, it does not recap the methodology for the HRA or the results of either the likely significant effects test or the appropriate assessment for the LPDMP, including the 'in-combination' assessment. Instead, it focused specifically on whether the MMs would result in likely significant effects on any Habitats Sites.

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<sup>1</sup> Paragraph: 023 Reference ID: 11-023-20140306; revision date: 06 03 2014

<sup>2</sup> *Ibid*

Yours sincerely,

A rectangular box containing a handwritten signature in blue ink that reads "Steve Smith".

Steven Smith  
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