

Topic Paper: Green and Blue Infrastructure

December 2017

To accompany Guildford borough Submission Local Plan: strategy and sites



Alternative formats

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Topic paper: Green and Blue Infrastructure

1 Purpose of this topic paper

- 1.1 This topic paper is one in a series, which sets out how we have developed the key strategy within the Guildford borough Submission Local Plan: strategy and sites document. Each topic paper looks at the relevant national and local guidance that informs the Submission Local Plan. Topic papers explain how the strategy has developed, in addition to the information, evidence and feedback that have informed the choices made in formulating the policies.
- 1.2 The intention of the topic papers is to provide background information; they do not contain any policies, proposals or site allocations. Topic papers have been produced to accompany the Submission Local Plan to the Secretary of State for examination.
- 1.3 The main areas covered by this topic paper are:
 - green and blue infrastructure, including open space, biodiversity and landscape, and
 - the Thames Basin Heaths Special Protection Area.
- 1.4 This topic paper explains the development of Submission Local Plan: strategy and sites policies ID4 Green and blue infrastructure and P5 Thames Basin Heaths Special Protection Area.

2 Policy Context

National context

- 2.1 Our policies must be positively prepared, justified, effective and consistent with national policy and legislation. The [National Planning Policy Framework](#) (NPPF) sets out the overarching planning policy framework, supported by [Planning Practice Guidance](#) (PPG).

Legislation

- 2.2 Section 40 of the Natural Environment & Rural Communities (NERC) Act 2006 places a “Biodiversity Duty” on local authorities to have regard to conserving biodiversity when setting policy or making decisions, including in the planning system. It states that conserving biodiversity includes restoring or enhancing a species population or habitat. The PPG (Natural Environment, paragraph 7) states that this includes seeking to make a significant contribution to meeting the commitments made by government in its Biodiversity 2020 strategy by seeking to minimise impacts on biodiversity and providing net gains where this is possible.
- 2.3 The UK is a signatory of a number of international agreements and treaties that address biodiversity, notably the Convention on Biological Diversity treaty opened at the Rio earth summit in 1992, and the Bern Convention, a treaty signed by 46 European states and some states in Africa.

National Planning Policy Framework

- 2.4 The National Planning Policy Framework requirements relating to green and blue infrastructure are summarised in the following bullet points.

Open space

- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify qualitative and quantitative surpluses and deficits.
- Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless
 - an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements
 - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location
 - the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.
- Planning policies should protect and enhance public rights of way and access.
- Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them.

Biodiversity and landscape

- Pursuing sustainable development involves seeking positive improvements in the quality of the natural environment, including moving from a net loss of biodiversity to achieving net gains for nature.
- The planning system should contribute to and enhance the natural and local environment by:
 - Protecting and enhancing valued landscapes, geological conservation interests and soils
 - Recognising the wider benefits of ecosystem services
 - Minimising impacts on biodiversity and providing net gains in biodiversity where possible... including by establishing coherent ecological networks.
- Local planning authorities should set criteria based policies against which proposals for development affecting protected wildlife, geodiversity or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and the contribution they make to wider ecological networks.
- Local plans should include a strategic approach that plans positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
- Planning policies should:
 - plan for biodiversity at a landscape-scale across local authority boundaries,
 - identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation
 - promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations.
- Great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty.
- Planning policies should aim to identify and protect areas of tranquillity that are prized for their recreational value for this reason.

- Planning policies and decisions should be based on up-to-date information about the natural environment, for example, drawing on River Basin Management Plans. Working with Local Nature Partnerships, this should include an assessment of existing and potential components of ecological networks.
 - Local Plans should include strategic policies to deliver conservation and enhancement of the natural and historic environment, including landscape.
- 2.5 Policies ID4 and P5 are strategic policies which operate at a large scale. Some of the requirements of the NPPF set out above are better addressed through detailed Development Management policies or guidance. This is discussed later in this document.
- 2.6 The EU Water Framework Directive (WFD) requires all EU member states to achieve a “good” ecological and chemical status for all groundwater and surface water bodies by 2027 at the latest. Much of the River Wey flowing through the borough achieves “moderate” status, with some tributaries rated as “poor” and “bad”. The waterways in our borough are both significant public open spaces and important elements of our borough’s biodiversity and landscape and are therefore addressed through policy ID4. This in turn means that policy ID4 must have due regard to the aims of the WFD.
- 2.7 The UK has recently voted to exit the European Union. In March 2017 the government published the [Great Repeal Bill White Paper](#), which sets out the intention to incorporate all applicable EU law into British law and to preserve EU law already incorporated into British law. The European Union (Withdrawal) Bill is currently moving through parliament. Section 2(1) of the bill states “EU-derived domestic legislation, as it has effect in domestic law immediately before exit day, continues to have effect in domestic law on and after exit day”. Section 3(1) of the bill states “Direct EU legislation, so far as operative immediately before exit day, forms part of domestic law on and after exit day”. Therefore, European directives and legislation remain important considerations.

Local context

- 2.8 Green and blue infrastructure is an important issue for the local plan as much of Guildford borough is rural and it has significant environmental assets.
- 2.9 The Council has produced the [Open Space Sport and Recreation Assessment 2017](#) (Open Space Assessment) to inform our understanding of open space, sport and recreation provision in the borough. This updates and replaces the 2006 [PPG17 Open Space Sport and Recreation Audit](#).
- 2.10 The Surrey Nature Partnership (SyNP), the Local Nature Partnership for Surrey recognised by government, has developed a strategic approach to biodiversity based around Biodiversity Opportunity Areas (BOAs) across Surrey. BOAs are areas where there are concentrations of recognised sites of biodiversity importance, both statutory and non-statutory. BOAs represent areas where the maintenance, restoration and creation of priority habitats will be most effective in achieving the aim of conserving and enhancing biodiversity at a landscape (strategic) scale, making wildlife more resilient to a changing climate and other pressures. Each BOA has a number of policy statements (13 of which apply to our borough) that align with the national outcomes set out in Biodiversity 2020. This provides an ecosystem approach to nature conservation which extends across and beyond the county.
- 2.11 An overarching local approach to the environment is set out in the Guildford borough Corporate Plan 2015-20. Under the theme of the environment, our priorities are to enhance biodiversity and reduce pollution, protect and improve the environment and protect green spaces sustainably.

Neighbourhood Plans

- 2.12 Neighbourhood planning enables Neighbourhood Forums and Parish Councils to develop a plan setting out a vision and planning policies for their designated neighbourhood area. Those 'Neighbourhood Plans' which are successfully adopted will form part of the statutory development plan for the area that they cover. Where a Neighbourhood Plan is adopted or emerging before an up-to-date Local Plan is in place, the local planning authority should take it into account when preparing Local Plan policies.
- 2.13 There is currently one adopted Neighbourhood Plan (Burpham), one emerging, post-examination Neighbourhood Plan (Effingham), and one progressing towards examination (East Horsley) within the borough. Six other Parish Councils are also currently producing Neighbourhood Plans.
- 2.14 Burpham Neighbourhood Plan includes three policies that deal with open space: policies B-EN1, B-EN2 and B-EN3. These policies protect private green space on residential gardens and existing public open spaces, including by designating a number of Local Green Spaces.
- 2.15 The Effingham Neighbourhood Plan contains policies covering green infrastructure that support the biodiversity improvements and improve the linkages between habitats at the neighbourhood level in much the same way as the BOA approach does at the strategic level.
- 2.16 It is considered that there is no conflict between policies ID4 and P5 and the Burpham and Effingham neighbourhood plans.
- 2.17 The weight given to an emerging plan will depend on, among other things, the extent to which there are unresolved objections to the plan (NPPF paragraph 216). Therefore, an emerging neighbourhood plan will pick up weight once evidence of consultation is published and the level of unresolved objection is known. At time of writing, the Effingham Neighbourhood Plan has been through examination, which has resolved any remaining objections, and is progressing towards a referendum. The East Horsley neighbourhood plan is progressing towards examination and is accorded very little weight at this stage.
- 2.18 Details are available at <http://www.guildford.gov.uk/neighbourhoodplanninginformation>.

3 Evidence base

- 3.1 The National Planning Policy Framework requires us to develop policies based on up to date evidence. Our evidence base comprises documents that have helped inform past and current stages of our Local Plan policy development; emerging evidence will help inform future development of policies for the Local Plan.
- 3.2 The key pieces of evidence base relevant to green and blue infrastructure are as follows.
- [Open Space, Sports and Recreation Assessment 2017](#)
 - [Assessment of Site for Amenity Value 2017](#)
 - [Biodiversity Opportunity Areas \(SyNP\) December 2015](#)
- 3.3 Further information and copies of the evidence base documents are available on the Councils website at: <http://www.guildford.gov.uk/newlocalplan/evidencebase>.

4 Appraisal

- 4.1 The following section brings together relevant legislation, national policy, guidance and evidence base findings where appropriate and sets out the reasoning for the policy approach taken in the Submission Local Plan: strategy and sites.
- 4.2 This section also highlights important issues raised during consultation on the Proposed Submission Guildford borough Local Plan: strategy and sites in 2016 and 2017 and sets out how these have influenced the development of policy.

Consultation feedback

- 4.3 As part of developing the Local Plan we have consulted at the following main stages:
- Regulation 18 Issues and options (October 2013) – which identified a range of issues and potential options for how we should plan for Guildford borough
 - Regulation 18 Draft Local Plan (July 2014) – which outlined our preferred approach for planning for Guildford borough
 - Regulation 19 Proposed Submission Local Plan (June 2016) – which included the policies and sites that we had intended to submit for examination
 - Regulation 19 Proposed Submission Local Plan (June 2017) – a targeted consultation on proposed changes to policies and sites
- 4.4 Comments received as part of the consultation stages have been taken into account in the preparation of the Local Plan. The main issues raised in all four consultations, together with our response, is set out in the accompanying [Consultation Statement](#).

Thames Basin Heaths Special Protection Area

- 4.5 The Thames Basin Heaths Special Protection Area (SPA) is a network of heathland sites that covers 8,274 hectares of Berkshire, Hampshire and Surrey. The SPA provides a habitat for three internationally important bird species that nest on or near the ground and, as a result, are very susceptible to predation by cats, rats and crows and to disturbance from recreational activities. The SPA is protected from adverse effects under European and UK law.
- 4.6 The Regulation 18 Draft Local Plan 2014 did not include an equivalent policy to P5 Thames Basin Heaths Special Protection Area (SPA). Policy P5 was developed following a consultation objection from Natural England in 2014 which identified the need to include such a policy in order to comply with the Conservation of Habitats and Species Regulations (2010, Habitats Regulations).
- 4.7 A detailed approach to protecting the SPA from adverse effects is currently set out in policy NRM6 of the South East Plan, which remains in force. This policy stipulates:
- the avoidance of the impacts of urbanisation and increased recreational pressure on the SPA through a prohibition on new residential development within 400 metres of the SPA boundary
 - where new dwellings are built within five kilometres of the SPA and significantly large residential development is built within five to seven kilometres of the SPA, the avoidance of impacts from increased recreational pressure through the provision of Suitable Alternative Natural Greenspace (SANG); alternative recreational space that “soaks up” potential SPA visitors, and
 - mitigation of the impacts of recreational use of the SPA through Strategic Access Management and Monitoring (SAMM) measures.¹

¹ See the [Guildford Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 SPD](#) for more information about the approach, SANG and SAMM

- 4.8 The protection of the SPA extends beyond the planning system. Damaging the SPA is an offence under UK law.
- 4.9 The Council has received counsel's advice that confirms that the approach to protecting the SPA must follow the detailed provisions of policy NRM6, both as a matter of compliance with the South East Plan and in order to meet the requirements of the Habitat's Regulations. As a result of the combination of the strong legal protection afforded to the SPA and the detailed nature of the prescribed approach to protecting it, the Council has developed a standalone policy for the SPA that goes into a high level of detail.
- 4.10 During consultations, objections were received calling for some or all developments to be excused from the need to provide SANG. There were also calls for other developer obligations, such as affordable housing, to be given priority over the SPA tariff used to fund the SPA protection measures. Given legal protections afforded to the SPA and the requirements of policy NRM6, the Council does not consider these as realistic options. The Guildford Local Plan Viability Update (2017) report that accompanies the plan indicates that the scale of developer obligations is viable and that therefore all obligations can be met.
- 4.11 Objections were received that called for the Local Plan to set out whether or not enough SANG will be provided in order to deliver the sites in the plan. The Council does not consider this necessary as the Infrastructure Delivery Plan that accompanies the plan sets out a scenario that shows that enough SANG can be provided in the right places. The SANGs included within this scenario are identified in the plan in Appendix C: Infrastructure Schedule. It was not considered appropriate to allocate SANGs within the local plan as SANGs could suitably be provided in alternative locations to those set out in the Infrastructure Delivery Plan and Appendix C.
- 4.12 The monitoring indicators for Policy P5 consist of monitoring the delivery of SANG and monitoring the number of net new dwellings built within 400 metres of the SPA. It was not considered appropriate to include monitoring the health of the SPA or visitor numbers on the SPA (as some consultation respondents had called for) for the following reasons:
- monitoring SPA visitor numbers is undertaken by the JSPB² as part of the SAMM project and
 - the approach to protecting the SPA takes place strategically across 11 districts and focuses on the health of the SPA and the bird populations as a whole, so there is limited value in monitoring the health of the SPA in just one borough.

Biodiversity and landscape

- 4.13 The NPPF and the NERC Act call for net gains for nature and biodiversity, not just preserving and protecting what currently exists. This means that the Local Plan must take a proactive approach that goes beyond protective designations and deliver biodiversity gains.
- 4.14 The NPPF adds further detail by requiring the Local Plan to specifically set out a strategic approach to planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (paragraph 114). Planning policies must also plan for biodiversity at a landscape scale across local authority boundaries (paragraph 117). This is a clear indication that strategic local plan policies for biodiversity and landscape must consider a context wider than

² Joint Strategic Partnership Board consisting of the SPA affected local authorities advised by Natural England.

the local area, and must both manage and enhance existing biodiversity and create new biodiversity networks.

- 4.15 The Regulation 18 Draft Local Plan 2014 included Policy 19 Green and blue infrastructure. This earlier policy was significantly different from Policy ID4 Green and Blue Infrastructure in the Regulation 19 plans. The approach to planning for biodiversity at a landscape scale through BOAs set out in Policy ID4 was implemented following consultation feedback received in 2014, which highlighted the SyNP's work (see paragraph 2.9). Following this consultation, the Council engaged with SyNP to consider how the approach could be incorporated into local policy. The Council agrees that the SyNP approach is robust and meets the requirements of the NPPF and the NERC act so has not considered developing an alternative approach.
- 4.16 The Regulation 18 Draft Local Plan 2014 included Policy 19 Green and blue infrastructure. This earlier policy was significantly different from Policy ID4 Green and Blue infrastructure in the Regulation 19 plans. The approach to planning for biodiversity at a landscape scale through BOAs set out in Policy ID4 was implemented following consultation feedback received in 2014, which highlighted the SyNP's work (see paragraph 2.9). Following this consultation, the Council engaged with SyNP to consider how the approach could be incorporated into local policy. The Council agrees that the BOA approach developed by SyNP is robust and meets the requirements of the NPPF and the NERC act so has not considered developing an alternative approach.
- 4.17 Policy ID4 implements the SyNP approach primarily in the following two ways.
- It states that the Council will seek opportunities for habitat restoration and creation, particularly within and adjacent to these BOAs. The Council's Parks and Countryside service manages the Council's own estate in ways consistent with the BOA approach and, as the supporting text in Policy ID4 states, new SANGs promoted through the Local Plan are expected to make a very significant contribution in this regard. The Council will design and manage its SANGs to support the objectives of the BOA they are in or adjacent to where possible and appropriate.
 - It requires proposals for development to deliver net gains in biodiversity that support the BOA objectives where possible. This includes proposals for built development, new open space and SANGs provided by private landowners.
- 4.18 While SANGs are expected to make a significant contribution to achieving net gains in biodiversity, it must be acknowledged that the primary role of SANGs is to provide space for recreation. The Council's experience in delivering and managing SANGs suggests that, in the majority of cases, these two aims can co-exist, and that providing biodiversity enhancements creates better SANGs by increasing their attractiveness to people that would otherwise visit the SPA. However, it is acknowledged that there may be local circumstances where the two aims are not compatible. Paragraph 4.6.45 of the supporting text for policy ID4 sets out the requirement for appropriate site selection, design and management to ensure both aims can be met. The text acknowledges that the primary role of SANGs is to provide space for recreation so that, in a situation where a balance truly cannot be made, recreation will take priority in order to deliver effective protection for the SPA.
- 4.19 The Infrastructure Delivery Plan that accompanies the Local Plan identifies over 240 hectares of new SANG land. Under Policy ID4 these will support the SyNP approach wherever this is possible. Taken alongside the Council's management of existing sites, and biodiversity improvements on development sites, the contribution to the SyNP strategy, and therefore the national objectives set out in Biodiversity 2020, is expected to be significant.

- 4.20 Paragraph 117 of the NPPF states that areas identified by local partnerships for habitat restoration or creation should be identified and mapped. Policy ID4 identifies and maps the SyNP BOAs within the supporting text.
- 4.21 Designated international, national and local sites are identified on the policies map along with ancient woodland in order to meet the NPPF requirement to identify and map the components of ecological networks. The BOAs comprise an ecosystem approach to conservation and as such mapping these in the supporting text of Policy ID4 also identifies the components of ecological networks.
- 4.22 Consultation representations demonstrated a lack of satisfaction with Policy 19 of the draft Local Plan Strategy and Sites 2014 due to the lack of detail, lack of clarity for those seeking planning permission and the overly aspirational nature of the policy. It is agreed that policies should be clear and precise, and that it should be clear to anyone seeking planning permission what they are being asked to achieve or avoid. Therefore, Policy ID4 at paragraph two states that development proposals should demonstrate how they will deliver net gains in biodiversity where possible, and how those biodiversity measures will support the objectives of a BOA where they fall within or adjacent to one. Paragraph 4.6.42a states that the SyNP has produced policy statements for BOAs, which provide guidance on suitable biodiversity improvements. It is considered that this provides a resource that will enable applicants seeking planning permission to plan appropriate biodiversity measures.
- 4.23 In order for this element of the policy to avoid becoming unduly onerous, paragraph 4.6.42 clarifies that “net gains” means improvements to biodiversity through habitat creation and/or enhancement that can be integrated into the design of the site, and can include measures on building structures. It further explains that these measures should be proportionate for the development and it is envisaged that this could include simple actions on the smallest development, such as the provision of nesting boxes. The Council will produce a green infrastructure SPD that will set out guidance on how this requirement can be met and what type of measures can be considered proportionate for different scales of development.
- 4.24 The Council acknowledges that there may be circumstances where it is not possible for biodiversity measures to support the BOA that the development falls within or adjacent to. As a result, paragraph 4.6.42a states that alternative biodiversity measures may be acceptable where it can clearly be demonstrated that they are more appropriate for the circumstances. This provides amplification for the requirement in the policy that “...biodiversity measures should support that BOA’s objectives” (emphasis added).
- 4.25 The monitoring of net gains in biodiversity is limited to developments of 25 homes or greater. This is because monitoring the gains on smaller sites would be impractical. It is considered that this will be adequate to judge whether the policy is being applied correctly and net gains are being achieved.
- 4.26 The NPPF (paragraph 115) requires Local Plans to give great weight to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty (AONB). Policy P1 Surrey Hills Area of Outstanding Natural Beauty sets out an approach to protecting the AONB that is consistent with the NPPF and the current Surrey Hills AONB management plan and takes account of the future AONB boundary review.
- 4.27 Policy ID4 addresses the NPPF requirement to aim to identify and protect areas of tranquillity (para. 123) at a strategic scale by protecting designated sites within the countryside, which are generally tranquil places. Places of tranquillity that are significant at a local scale are more appropriately addressed through Development Management policy or through neighbourhood plans.

The hierarchy of designated sites

- 4.28 The NPPF (paragraph 113) requires local planning authorities to set criteria based policies for judging proposals for development affecting protected wildlife, geodiversity or landscape, and requires international, national and locally designated sites to be in a hierarchy of protection that is commensurate with their status and the contribution they make to wider ecological networks.
- 4.29 Comments received during the consultations indicate strong support for the protection of designated sites. The borough has a large number of Sites of Nature Conservation Importance (SNCI) and Local Nature Reserves, some of which are also significant public spaces and/or important components of the borough's landscape. While national policy requires Local Plans to be positively prepared, the NPPF emphasises the protection of biodiversity and landscape by discussing it at some length and it is considered that protecting biodiversity and landscape should be considered a positive act. Policy ID4 therefore presents a negatively worded policy to emphasise the protection of designated sites, both to meet the NPPF and the weight of opinion presented in the regulation 18 and 19 representations. The protection accorded to designated sites becomes stronger further up the hierarchy as implied by the NPPF, but it is considered that the protection accorded to local sites at the bottom of the hierarchy is still strong and is commensurate with their value.
- 4.30 Policy P5 Thames Basin Heaths Special Protection Area (SPA) specifically deals with the protection of the SPA. The SPA is an international site in the hierarchy described above, but has a separate policy because there is an established, detailed approach to its protection. This approach needs significant explanation and would not read well if contained within Policy ID4.

Blue infrastructure

- 4.31 Consultation comments, including from the Environment Agency, received during the draft plan consultation in 2014 identified and disagreed with a lack of focus on blue infrastructure and the aims of the WFD. To address this, Policy ID4 introduces a specific requirement to support the aims of the WFD and refers to guidance developed by the Environment Agency.
- 4.32 Respondents in 2014 objected to the omission of flooding measures within Policy 19 Green and blue infrastructure in the draft Local Plan strategy and sites. Policy ID4 does not address flooding as this is fully addressed through the addition of Policy P4 Flood Risk and Water Source Protection Zones in the Regulation 19. However, ID4 does acknowledge the important role that green space plays in flood risk management and identifies the management and restoration of flood plains as a priority, as this element of flood risk management is strongly linked to green and blue infrastructure.

Open space

- 4.33 It is considered that the Open Space across the borough cumulatively forms an asset of strategic importance that is appropriately addressed through strategic policy. BOAs, which provide the strategic approach to green infrastructure at the landscape scale, do not cover settlements and it is considered that Open Space forms the local counterpart to BOAs for settlement areas.
- 4.34 The NPPF provides detailed policy for the protection of open space, encompassing "all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity". Paragraph 74 states: "Existing open

space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”

- 4.35 There is no need to add further detail to NPPF policy regarding the protection of open space as the protection is already clear. Policy ID4 therefore states simply that all Open Space will be protected in accordance with the NPPF. However, the policy states that land identified in the Open Space Assessment falls under the definition of Open Space provided by the NPPF in order to make it clear where national policy on Open Space should apply.
- 4.36 Standards for Open Space provision in relation to new residential developments are considered a detailed matter and will be addressed through development management policy later. These standards will be informed by the Open Space Assessment.
- 4.37 The Open Space Assessment identifies land of public value across the borough. Open Spaces are also identified on the Policies Map as detailed below.
- 4.38 The Guildford Local Plan 2003 includes Policy R5 Protection of Open Space which protects all open space within urban areas, and identifies sites of 0.4 hectares or over on the proposals map. This approach to Open Space in urban areas and the identified sites on the 2003 Proposals Map have been carried over to the Submission Local Plan Strategies and Sites as it is considered that these spaces continue to fulfil the purpose for which they were designated.
- 4.39 Policy ID4 continues the approach in Policy R5 by identifying all open space within urban areas as Open Space under the NPPF definition. Policy R5 is considered to have worked well and contributes significantly to the character of our urban areas. All open spaces within urban areas are considered to have public value because:
- they provide relief from the intensity of the urban environment
 - residents of urban areas may not have easy access to the countryside and
 - they provide breaks in the built environment that maintain the character of urban settlements.
- 4.40 The generally pleasant character is one of the things that makes our two towns attractive and has implications for residents’ wellbeing and the borough’s economy. It is therefore a strategic asset that is considered appropriate to protect through strategic policy.
- 4.41 The plan proposes to inset some villages from the Green Belt. The same circumstances do not apply to these villages: the built form of these non-urban villages is not as intense and residents are more likely to have access to the countryside. Therefore, it is not considered appropriate to protect all open space within these villages by default. However any planning applications for development on this land will still need to be considered in accordance with other policies that protect the character and amenity of those villages.
- 4.42 In view of the above, where villages have been proposed for inset from the Green Belt it has been necessary to consider whether any of the open spaces within the inset boundary hold particular public value and should be identified as Open Space

for the purposes of policy ID4. The Council has produced the [Assessment of Sites for Amenity Value 2017](#) (Amenity Assessment) to identify land of public amenity value within villages and other sites that are proposed to be inset from the Green Belt.

- 4.43 The Amenity Assessment looks at land within proposed inset boundaries, but not land where inset boundaries were drawn specifically to take in allocations on the edges of villages. Land that was assessed as having public amenity value that would be harmed by development is identified as Open Space on the Policies Map, alongside the Open Spaces in the towns brought across from policy R5 of the 2003 Local Plan. Land within inset boundaries that is used for recreational open space, sport and recreation is identified in the Open Space Assessment and therefore will also be protected in line with the NPPF, as set out in policy ID4.
- 4.44 During the Regulation 19 consultations, Surrey County Council objected to the inclusion of school playing fields within the definition of Open Space because they are not always publicly accessible, and asked that the requirements of NPPF paragraph 72 be reflected in Policy ID4. Paragraph 72 requires “great weight” to be given to the need to create, expand or alter schools to meet the needs of existing and proposed communities. The Council agrees that this means where schools propose to build on school playing fields additional consideration must be given over and above the need to protect Open Space. However, it is not agreed that school playing fields should be excluded from the definition of Open Space because privately owned land that is used for sport and recreation (e.g. golf clubs, bowling greens) can be Open Space, and furthermore, Open Space can be designated purely for its visual amenity (see paragraph 4.46). Therefore, school playing fields remain identified as Open Space but paragraph 4.6.49a has been included in the supporting text to acknowledge that consideration must be given to the need to expand or alter schools.
- 4.45 During the regulation 19 consultations, the Council received objections from the owners of two land parcels that have been identified as Open Space. These land parcels are “Site 52, Land off Heath Drive, Send” and “Site 1264, Land rear of Greenhill and Burnside, Chinthurst Lane, Shalford” in the Land Availability Assessment. Both these sites fall within proposed Green Belt inset boundaries. The owner of Site 52 objects primarily because the land is not publicly accessible and does not have any recreational value, and that this means it cannot be considered for the Open Space designation. The owner of site 1264 objects on the basis that the land has no visual amenity value.
- 4.46 Regarding the objection to site 52, the NPPF defines Open Space as “All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as visual amenity”. The Council’s view is that the NPPF definition of Open Space covers land that does not offer recreational value but does offer value for visual amenity and therefore it is appropriate to designate these two sites. Both sites were assessed through the Amenity Assessment (sites ETH_088 and ETH_084) and were found to have value for visual amenity, but it was also found that the sites could be partially redeveloped whilst retaining or improving that value (page 143 of the Amenity Assessment). In view of this, the Council considers that it is appropriate to designate both sites as Open Space and the designations were therefore retained in the second Regulation 19 consultation.
- 4.47 The Council received an objection to Policy ID4 during both consultations from Sport England who wanted Policy ID4 expanded to protect sports facilities (e.g. sports centres, swimming pools). As Policy ID4 deals with Open Space, it was considered more appropriate to include protection for sports facilities in Policy E6 The Leisure

and Visitor Experience, as this deals with Leisure facilities. E6 and ID4 together protect both indoor and outdoor sport provision.

- 4.48 The Council received a number of nominations for Local Green Space (LGS) during both regulation 18 consultations. Policy ID4 does not designate any land as LGS because LGS by its very nature is locally significant and are therefore not a matter for strategic policy. A further consideration is the relationship between strategic local plan policies and neighbourhood plans.
- 4.49 The Council supports neighbourhood planning and is currently engaging with a number of existing and prospective neighbourhood planning bodies in order to help deliver neighbourhood plans. Neighbourhood plans are tested through examination and one of the tests is that they are in general conformity with the strategic policies in the adopted Local Plan. Policy ID4 is a strategic policy, so including a policy on LGS would place a constraint on the scope of neighbourhood plan LGS policies. This is an important consideration because LGS is a significant designation available for neighbourhood plans. Therefore, the Council considers that LGS should be designated through either Development Management policy or through neighbourhood plans.

5 Local Plan Policy Approach

- 5.1 The Submission Local Plan: strategy and sites document proposes the strategic green and blue infrastructure policies for the new Local Plan. It will be followed later by the Local Plan Development Management document that deals with detailed policies and the Council intends to deliver a Green and Blue Infrastructure Supplementary Planning Document (SPD) that will provide detailed guidance on both policy ID4 and later Development Management policies. Policy P5 should be read alongside the Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 SPD (the strategy), which provides detail on the approach outlined in the policy.
- 5.2 Strategic policies are those that address the big picture rather than dealing with detailed matters. They may cover things like the spatial pattern of development, protection of valued assets of borough wide significance and issues that affect the whole borough or beyond. The NPPG provides further guidance stating that strategic policies may have the following characteristics:
- they set out an overarching direction or objective
 - they seek to shape the broad characteristics of development
 - they set a framework for decisions on how competing priorities should be balanced
 - they set a standard or other requirement that is essential to achieving the wider vision and aspirations in the Local Plan
 - they are identified as being strategic in the Local Plan
- 5.3 The content of policies ID4, P1 and P5 is informed by this guidance and the policies do not deal with matters that do are deemed non-strategic. The approach set out in these policies takes a strategic approach to protecting and enhancing green and blue infrastructure as required by the NPPF.
- 5.4 As detailed in the appraisal, Policies ID4, P1 and P5 respond to the requirements of the NPPF where they relate to strategic matters, the results of past consultations, guidance from statutory bodies and evidence base findings.

6 Next steps

- 6.1 The draft Local Plan strategy on green and blue infrastructure responds to the requirements of national policy and the results of our evidence.
- 6.2 This topic paper accompanies the Submission Local Plan: strategy and sites that is submitted to the Secretary of State in December 2017. For more information please visit: www.guildford.gov.uk/newlocalplan.