

September 6<sup>th</sup> 2018Planning Policy  
Guilford Borough Council  
Millmead House,  
Guildford, GU2 4BB.

By email only

**Addendum: Habitats Regulations Assessment (including appropriate assessment) of the Main Modifications to Guilford Borough Council's Local Plan Policies and Site Allocation Development Plan Document**

Guilford Borough Council's Local Plan Proposed Submission Document 2015-2034 was subject to Habitats Regulations Assessment (HRA) in 2017, which was then updated in 2018. Since that time the Plan and HRA have been subject to Examination in Public and a series of modifications to the Plan have been proposed. It is therefore necessary for these Main Modifications to be subjected to HRA in order to determine whether they would alter any of the conclusions previously reached regarding the HRA of the Council's Proposed Submission Plan, or introduce any new impacts/effects. Since some of these modifications are associated with the allocation of new sites that will require mitigation for European site impacts (in the form of SANG) this analysis constitutes an appropriate assessment, continuing that undertaken in June 2018.

This letter forms the Habitats Regulations Assessment of those Main Modifications. This document is an addendum to the June 2018 HRA<sup>1</sup> of the Proposed Submission Plan that was subject to examination. The June 2018 HRA document should be referred to for methodologies and background on the potential linking impact pathways.

The HRA screening of the Main Modifications are presented in Appendix A, Table 1. This is not intended as a stand-alone assessment but should be read in conjunction with the HRA of the Local Plan<sup>2</sup>. As such, it does not seek to comprehensively recap all the issues and analyses that were covered in that document but specifically seeks to identify any issues with the proposed modifications themselves.

---

<sup>1</sup> AECOM (2018). Habitats Regulations Assessment for Guilford Borough Proposed Submission Local Plan: Strategy and Sites

<sup>2</sup> Ibid.

By email only

A summary of the key findings of HRA screening assessment of the Main Modifications is provided below:

Whilst the HRA analysis of the Main Modifications generally does not identify any substantial changes to the Plan document in HRA terms, there is a single additional site allocation (Policy 61 Land at Aaron's Hill, Godalming) which does provide a substantial change and deviation from the previous HRA report because this site is located within 3km of Thursley, Hankley & Frensham Commons (Wealden Heaths Phase 1) SPA.

The following discussion is a summary of the key findings from the test of likely significant effects undertaken in Appendix A, Table 1.

**Policy S3: Delivery of development and regeneration within Guildford Town Centre** identifies the accelerating demand for housing within the Guildford area. The modification identifies that more efficient use of land within Guildford is required to deal with this pressure. This may be achieved by encouraging the development of mixed use units and to demonstrate that the land has been used most efficiently. However this policy does not in itself provide for any location, type or quantum of development and can be screened out.

**Policy D1: Place shaping** replaces Policy D4: Character of design of new development. This modification, in combination the Design Guide Supplementary Planning Document (SPD), provides recommendations to maintain the areas distinct local character through high quality and inclusive design. These changes do not provide for any location, quantum or type of development previously identified (and thus subject to HRA) in these policies. Rather, these amendments merely specify building design to be specifically delivered within the borough. This policy modification can be screened out.

**Policy S2 Planning for the borough - the spatial development strategy** identifies an increase in the housing requirement during the plan period by 184 net new dwellings (i.e. an increase from 12,426 to 12,600). Whilst this increase in development has the potential to link to both increased atmospheric pollution and recreational pressure within European sites, both these impact pathways have previously been considered and the technical assessment within the June 2018 HRA referred to the Council's SANG assessment produced to support the draft Local Plan 2016, which was based on an assumption of 13,860 dwellings to be delivered between 2013 and 2033. A total of 14,641 dwellings were captured in the traffic modelling for the air quality calculations (covering growth in Guildford from 2013 to 2033 but with a forecast year of 2031). As such, a quantum of allocated residential development greater than the newly proposed 12,600 dwellings (2015 to 2034) has already been assessed, and this modification does not provide for any new or exacerbated impact pathways beyond those previously discussed in the June 2018 HRA, and this modification can be screened out. Having considered the overall quantum of development, individual site allocations are considered separately below.

The Main Modifications provides for **five new residential allocations and one amended employment allocation**; these are: White Lion Walk, High Street, Guildford (Policy 60); Land at Aaron's Hill, Godalming (Policy 61); Land at Hornhatch Farm, adjoining New Road, Chilworth (Policy 62); Land west of Alderton's Farm, Send Marsh Road, Send (Policy 63); and Land between Glaziers Lane and Strawberry Farm, Flexford (Policy 64).

All new site allocations have the potential to result in **increased atmospheric pollution** contributions. However, as previously stated, the air quality assessment was based on a higher quantum of development than was provided by the Plan, so was already

precautionary. This increased quantum of both residential and employment development provided by these policies has already been accounted for in these previous precautionary calculations, and as such no new or exacerbated impact pathway is identified and this impact pathway can be screened out.

Policy 60: White Lion Walk, High Street, Guildford, Policy A64: Land between Glaziers Lane and Strawberry Farm, Flexford and Policy A63: Land west of Alderton's Farm, Send Marsh Road, Send are all located within 5km of the Thames Basin Heaths SPA, while Policy A62: Land at Hornhatch Farm, adjoining New Road, Chilworth, is located between 5km and 7km from the SPA. As such it can be considered that **increased recreational pressure** stemming from these developments is a realistic impact pathway to the Thames Basin Heaths SPA, although they are all sufficiently far from Thursley, Hankley and Frensham Commons SPA that the impact pathway can be screened out.

Site allocation Policy 61 Land at Aaron's Hill, Godalming is located within 3km of Thursley Hankley and Frensham Commons SPA. The provision of 200 net new dwellings in this location has the potential to have an adverse effect on the integrity of this SPA in combination and as such is discussed further in this appropriate assessment below.

#### **Appropriate Assessment: Allocations in relation to recreational pressure on Thames Basin Heaths SPA**

Policy 60: White Lion Walk, High Street, Guildford, Policy A64: Land between Glaziers Lane and Strawberry Farm, Flexford and Policy A63: Land west of Alderton's Farm, Send Marsh Road, Send are both located within 5km of the Thames Basin Heaths SPA, while Policy A62: Land at Hornhatch Farm, adjoining New Road, Chilworth, is located between 5km and 7km from the SPA. As such, all of these sites have the potential to have an adverse effect on the integrity of the European site in combination. However, the Appropriate Assessment of SANG provision undertaken in the June 2018 HRA identified that the Borough has sufficient approved SANG capacity to provide SANG for up to 13,860 net new dwellings and as such sufficient capacity is available to accommodate the extra sites, as this brings the total of sites allocated in the plan to 12,600.

The closest SANG site to Policy A64 is Russell Place Farm, which has spare capacity to service more than 600 net new dwellings, and as such could incorporate the development of 105 net new dwellings provided by this allocation. Policies 60 and 62 would be allocated to Tyting/Chantry SANG, which has a large amount of spare capacity. Policy A63 would be allocated to Long Reach SANG, which has 4.1 hectares remaining, which would cover over 200 homes and thus has more than sufficient capacity for this allocation.

With this in mind and the provision provided by existing Policy P5: Thames Basin Heaths Special Protection Areas which provides for both the provision of SANG and contributions for SAMMS, it can be determined that these site allocations will not have an adverse effect on integrity on the Thames Basin Heaths SPA in combination.

#### **Appropriate Assessment in relation to recreational pressure on Thursley, Hankley & Frensham Commons (Wealden Heaths Phase I) SPA, Thursley, Ash, Pirbright & Chobham SAC and Thursley & Ockley Bogs Ramsar site**

The nearest portions of these European sites are located 1.5km from Guildford Borough Council boundary, located in Waverley Borough. Within Waverley Borough the SPA overlaps

other European sites, namely Ramsar and SAC components entirely contained within this SPA area. All of the European designated sites within Waverley are underpinned by the Thursley, Hankley and Frensham Commons SSSI.

These commons together incorporate a heath and valley mire complex. Thursley Common is a National Nature Reserve managed by Natural England and Frensham and Witley Commons are managed by the National Trust. A large part of the site is owned by the MoD (Hankley Common and Ockley Common), being regularly used for military activities and informal recreation. All components of this SPA lie within Waverley Borough.

This extensive site represents some of the finest remaining heathland on the Lower Greensand in Southern England. The valley mire on Thursley Common is regarded as one of the best in Britain. The site is of national importance for its bird, reptile and invertebrate populations.

Hankley Common has the most extensive tracts of dry heath, but the habitat is also well represented on the other Commons. Peatland is of greatest value on Thursley Common, but on the other commons is less extensive but still important. The site is one of the richest for birds in Southern England. Breeding birds specifically associated with the heathland include woodlark, Dartford warbler, and nightjar.

Wealden Heaths Phase I **SPA** qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting breeding populations of European importance of the following species listed on Annex I of the Directive<sup>3</sup>:

- Nightjar *Caprimulgus europaeus*
- Woodlark *Lullula arborea*
- Dartford warbler *Sylvia undata*

These species nest on or near the ground and as a result are susceptible to predation and disturbance.

Thursley, Ash, Pirbright and Chobham **SAC** is designated for three Annex I habitats<sup>4</sup>.

The qualifying Annex 1 habitats are:

- Wet heathland with cross-leaved heath
- Dry heaths
- Depressions on peat substrates

Thursley and Ockley Bog **Ramsar** site qualifies under two of the nine Ramsar criteria<sup>5</sup>.

---

<sup>3</sup> <http://jncc.defra.gov.uk/pdf/SPA/UK9012131.pdf> [accessed 21/08/2018]

<sup>4</sup> <http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012793.pdf> [accessed 21/08/2018]

<sup>5</sup> <http://jncc.defra.gov.uk/pdf/RIS/UK11074.pdf> [accessed 21/08/2018]

- Criterion 2: The site supports a community of rare wetland invertebrate species including notable numbers of breeding dragonflies.
- Criterion 3: It is one of the few sites in Britain to support all six native reptile species. The site also supports nationally important breeding populations of European nightjar *Caprimulgus europaeus* and woodlark *Lullula arborea*.

## Conservation Objectives

### Wealden Heaths Phase I SPA<sup>6</sup>

*'With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;*

*Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;*

- *The extent and distribution of the habitats of the qualifying features*
- *The structure and function of the habitats of the qualifying features*
- *The supporting processes on which the habitats of the qualifying features rely*
- *The population of each of the qualifying features, and,*
- *The distribution of the qualifying features within the site.'*

### Thursley, Ash, Pirbright and Chobham SAC<sup>7</sup>

*'With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;*

*Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;*

- *The extent and distribution of qualifying natural habitats*
- *The structure and function (including typical species) of qualifying natural habitats, and*
- *The supporting processes on which qualifying natural habitats rely'*

## Historic Trends and Current Conditions

The latest Natural England condition assessment of Thursley, Hankley and Frensham Commons SSSI determined that 77% of the site was in favourable condition, whilst the remainder was recovering from unfavourable status<sup>8</sup>. The improvements predominantly stemmed from the introduction of Higher Level Stewardship schemes, including for wetter habitats and water bodies on the SSSI. Regarding previous analyses for East Hampshire and South Downs National Park Joint Core Strategy and the adopted Waverley Local Plan

---

<sup>6</sup> <http://publications.naturalengland.org.uk/file/5745952828686336> [accessed 21/08/2018]

<sup>7</sup> <http://publications.naturalengland.org.uk/file/6293604645470208> [accessed 21/08/2018]

<sup>8</sup> <https://designatedsites.naturalengland.org.uk/ReportConditionSummary.aspx?SiteCode=S1004371&ReportTitle=Thursley,%20Hankley%20&%20Frensham%20Commons%20SSSI> [accessed 21/08/2018]

Part 1 (LPP1), Natural England have concurred that there is no evidence of significant existing disturbance problems at this site comparable to the Thames Basin Heaths SPA.

The key environmental conditions that support the features of European interest have been defined as:

- Appropriate management
- Managed recreational pressure
- Minimal air pollution
- Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species
- Maintenance of appropriate water levels
- Maintenance of water quality
- Management of disturbance during breeding season (March to July) (SPA and Ramsar sites)

**Recreational pressure and disturbance** is the only linking impact pathway that has the potential to link the European sites to the Main Modifications as identified by site allocation Policy 61 Land at Aaron's Hill, Godalming in Appendix A, Table 1. This allocation will be discussed further in relation to this potential linking impact pathway in the following paragraphs.

#### Policy 61 Land at Aaron's Hill, Godalming

This site allocation for 200 dwellings is located within 3km of the SPA.

It should be noted that Policy ID4: Green and Blue Infrastructure states that '*Permission will not be granted for development proposals unless it can be demonstrated that doing so would not give rise to adverse effects on the integrity of European sites, whether alone or in combination with other development. Any development with a potential impact on SPA or SAC sites will be subject to a Habitats Regulations Assessment*', thus providing full protection for all European designated sites. Similarly, the following text has been identified for inclusion in the plan regarding this specific site: '*(3) Avoid adverse impacts of development on the Wealden Heaths SPA through appropriate avoidance measures potentially including SANG*'.

Beyond this, the applicant has been in consultation with Natural England who have advised that mitigation for recreational pressure on the SPA is required for this specific development and have agreed that the principle of SANG provision for this site allocation can be used to avoid adverse effects on the SPA. A potential location for bespoke SANG has been identified. This site is subject to Natural England's SANG Suitability Criteria.

**Table 1: SANG Assessment of Land West of Eashing Lane**

Natural England Criterion	Discussion	Score (1, 0 or Potentially)
Must/ Should Have		
1) For all sites larger than 4ha there must be adequate parking for visitors, unless the site is intended for local use, i.e. within easy walking distance of the developments linked to it. The amount of car parking should be determined by the anticipated use of the site and reflect the visitor catchment of both the SANGS and the SPA	<ul style="list-style-type: none"> <li>• The proposed SANG at Land West of Eashing Lane is 16.7ha in size.</li> <li>• On reviewing freely available online mapping, the land has two public rights of way running through it but there is currently no suitable parking in place. This could be created as required from either Eashing Lane or The Hollow</li> <li>• Parking is typically required at a SANG (where provided) at a rate of 1 space for each hectare of SANG</li> </ul>	Potentially achievable
2) It should be possible to complete a circular walk of 2.3 – 2.5 km around the SANG	<ul style="list-style-type: none"> <li>• It is currently not possible to complete a circular walk around the site, due to limited public access. However, due to the size of the site, a walk of this size is possible.</li> </ul>	Potentially achievable
3) Car parks must be easily and safely accessible by car and should be clearly sign posted.	<ul style="list-style-type: none"> <li>• There are currently no car parks on the site. But a car park could be developed with access from either Eashing Lane or The Hollow. Signposting could be put in place where car parks are developed.</li> </ul>	Potentially achievable
4) The accessibility of the site must include access points appropriate for the particular visitor use the SANGS is intended to cater for.	<ul style="list-style-type: none"> <li>• The SANG is to provide recreational opportunities for a site allocation located more than 400m (approximately 800m) from the proposed SANG and as such will be accessible by car rather than on foot.</li> <li>• There is currently a public right of way on the site with access from Eashing Lane and The Hollow, with a second public right of way with access from Eashing Lane and the A283.</li> <li>• There is no car parking, but this could be developed due to the size of the site, with access from Eashing Lane or the Hollow.</li> </ul>	Potentially achievable
5) The SANGS must have a safe route of	<ul style="list-style-type: none"> <li>• None of the roads that surround the site contain footpaths and as such the site is not</li> </ul>	Potentially

access on foot from the nearest car park and/or footpaths	<p>accessible by foot.</p> <ul style="list-style-type: none"> <li>If a car park was provided within the site a safe walking route could be provided from the car park into the SANG site.</li> </ul>	achievable
6) All SANGS with car parks must have a circular walk which starts and finishes at the car park.	<ul style="list-style-type: none"> <li>The site currently does not have a public car park. A circular walk could be created to start and finish at a car park.</li> </ul>	Potentially achievable
7) SANGS must be designed so that they are perceived to be safe by users: they must not have tree and scrub covering parts of the walking routes	<ul style="list-style-type: none"> <li>From review of freely available online imagery, the site appears to be arable land bounded by hedge lines and woodland. The majority of the existing public right of way that connects from Eashing Lane to The Hollow does not appear to be restricted by any trees or scrub, although the northern end of this pathway passes through a residential garden. However the public right of way between Eashing Lane and the A283 appears at least in part to be closely grown with scrub</li> <li>Any walking routes created will not be restricted by any woodland or scrub</li> </ul>	Potentially achievable
8) Paths must be easily used and well-maintained but most should remain unsurfaced to avoid the site becoming urban in feel	<ul style="list-style-type: none"> <li>The existing public rights of way appear well maintained (from freely available online mapping) and unsurfaced.</li> <li>Any walking routes can be created as required.</li> </ul>	Potentially achievable
9) SANGS must be perceived as semi-natural spaces with little intrusion of artificial structures except in the immediate vicinity of car parks. Visually sensitive way-markers and some benches are acceptable.	<ul style="list-style-type: none"> <li>From review of freely available online imagery and mapping the site appears to be relatively free from intrusions and appears quite naturalistic (it is currently arable fields with hedgerow boundaries and a woodland strip to the north).</li> <li>Mapping indicates that there is a mast immediately adjacent to the site located on Eashing Lane, however this could be screened by tall vegetation if required.</li> <li>At its closest the site is located 10m from the A3, and as such could be subject to noise intrusion from the road.</li> </ul>	Potentially achievable
10) All SANGS larger than 12ha must aim to provide a variety of habitats for users to experience	<ul style="list-style-type: none"> <li>At present the site is dominated by arable land, bounded by hedgerows and woodland strips. It is recommended that a variety of habitats be created within the site to increase the variety of the habitats experienced by users.</li> </ul>	Potentially achievable

<p>11) Access within the SANGS must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.</p>	<ul style="list-style-type: none"> <li>• There is currently two public rights of way through the site, with unlimited access.</li> <li>• From reviewing the freely available online mapping, there is open space that could be sufficient for dogs to freely exercise safely.</li> <li>• The existing arable nature of the site means that there are no restrictions for dog access due to livestock.</li> </ul>	<p>Achieved.</p>
<p>12) SANGS must be free from unpleasant intrusions (e.g. sewage treatment works smells, etc.)</p>	<ul style="list-style-type: none"> <li>• At its closest the site is located 10m from the A3, and as such could be subject to noise intrusion from the road.</li> </ul>	<p>Unknown Potentially achievable</p>
<p>13) SANGS should be clearly sign-posted or advertised in some way.</p>	<ul style="list-style-type: none"> <li>• This site currently provides public access, and signs and advertisements of SANG could be put in place.</li> </ul>	<p>Potentially achievable</p>
<p>14) SANGS should have leaflets and/or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and be made available at entrance points and at car parks</p>	<ul style="list-style-type: none"> <li>• Currently there are two public rights of way on the site. Any SANG created could be advertised with leaflets distributed to new homes and at entrance points and at car parks.</li> </ul>	<p>Potentially achievable</p>
<p><b>A single criterion is achieved, with remaining criteria potentially attainable. However it is unsure if one criterion can be met due to the proximity of the site to the A3 and potential for noise intrusion.</b></p>		
<p><b>Desirable</b></p>		
<p>15) It would be desirable for an owner to be able to take dogs from the car park to the SANGS safely off the lead.</p>	<ul style="list-style-type: none"> <li>• There are currently two public rights of way on the site. There are no car parks on the site a present, but any car parks created could be created so that dogs could be walked freely off the lead from the car park to the SANG.</li> </ul>	<p>Potentially achievable</p>
<p>16) Where possible it is desirable to choose sites with a gently undulating</p>	<ul style="list-style-type: none"> <li>• From freely available mapping online, the site appears to be flat.</li> </ul>	<p>Unachievable</p>

topography for SANGS		
17) It is desirable for access points to have signage outlining the layout of the SANGS and the routes available to visitors.	<ul style="list-style-type: none"> <li>There are currently two public rights of way on the site. Any SANG could be created to include signage advising the layout and routes available to visitors.</li> </ul>	Potentially achievable
18) It is desirable that SANGS provide a naturalistic space with areas of open (nonwooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water on part, but not the majority of sites is desirable.	<ul style="list-style-type: none"> <li>The site provide a large expanse of open space (arable land), however there minimal areas of wood and scrub. Woodland/ orchards could be planted and grassland created to provide a naturalistic space.</li> </ul>	Potentially achievable
19) Where possible it is desirable to have a focal point such as a view point, monument etc. within the SANGS.	<ul style="list-style-type: none"> <li>From review of freely available online imagery, the site does not currently contain a focal point. If required a feature could be created.</li> </ul>	Potentially achievable
<b>The site could potentially meet four of the criteria. However one of the criteria is unattainable.</b>		
Additional Notes:	<ul style="list-style-type: none"> <li>There are currently two public rights of way on the site, so a visitor survey is required to allow for any discounting for existing use.</li> </ul>	
Summary:	<ul style="list-style-type: none"> <li>One of the Must/Should Have criteria has been achieved with all other remaining Must/ Should Have and Desirable criteria being achievable if required, with the exception of Desirable criteria 16. However it is unsure if one Must/Should Have criterion (12) can be met due to the proximity of the site to the A3 and potential for noise intrusion.</li> </ul>	

## Conclusion

The proposed SANG site at Land West of Eashing Lane could potentially provide suitable bespoke SANG for the site allocation. While there are some constraints associated with PRow and the presence of the A3, based on experience with other SANG in Guildford these are not likely to result in extensive discounting and in any event the site is large enough to allow c. 7ha for discounting and still function as a SANG for the 462 net new dwellings to be provided by this development both within Guildford and Waverley (200 net new dwellings within Guildford and 262 net new dwellings within Waverley).

In summary the Local Plan provides sufficient protective provision of European sites in the form of Policy ID4: Green and blue infrastructure that will ensure that no adverse effect on integrity of the SPA results by the requirement of a project specific HRA to be undertaken.

Yours sincerely,



### **Isla Hoffmann Heap**

Senior Ecologist, Environment and Ground Engineering, UK & Ireland

D +44-(0)1256-310-486

M +44-(0)7920-789-719

[Isla.hoffmann.heap@aecom.com](mailto:Isla.hoffmann.heap@aecom.com)

**Appendix A: Test of Likely Significant Effects of the Main Modifications to Guilford Borough Council’s Local Plan and Site Allocations Document.**

Cells identified in green in the ‘Potential HRA Implications’ column contain text to confirm that the Modification does not provide any linking impact pathways that could impact upon European sites. These are screened out and do not require further consideration.

**Appendix A, Table 1: Test of Likely Significant Effects of the Main Modifications to Guilford Borough Council’s Local Plan and Site Allocations Document.**

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
Front cover and forward	Minor Changes: re-wording of ‘objectives’ to <b>‘ambition’</b> and reformatting of capital letters to introduce the borough and the local plan.	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Introduction	Minor changes: reformatting of capital letters.	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Key facts about the borough	Minor changes: reformatting of capital letters and condensing of sentences.	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

<sup>9</sup> Only included where an allocation is amended.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
2.33 Other plans and strategies	Additional sentence: <b>'Key facts about the borough: Guildford Borough Submission Local Plan'</b> .	European sites. No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
2.33a Other plans and strategies	Additional paragraph: <b>'Surrey Nature Partnership (SyNP) is the nature partnership for Surrey recognised by the government. The NPPF requires us to collaborate and consult with the SyNP when drawing up plans. The SyNP has produced 'Naturally Richer: a Natural Capital Investment Strategy for Surrey' (2015), to plan and coordinate investment in the natural environment of Surrey. The State of Surrey's Nature (2017) provides a base line against which to measure changes in biodiversity and identifies priorities for nature conservation and investment.'</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
3 Spatial box	Minor changes: checking of spelling and grammar.  Additional sentence within Spatial Vision box: <b>'The redevelopment of Guildford Railway Station will deliver significant station improvements and assist in increasing station capacity, whilst</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
<p><b>Policy S1</b> Presumption in favour of sustainable development</p>	<p><b>making a contribution to meeting housing need on a brownfield site, in a highly sustainable location within the town centre.'</b></p> <p>Minor changes: reformatting of sentences.</p> <p>Amendments to paragraph: 3a '<del>Specific policies in that Framework indicate that development should be restricted.</del> <b>The application of policies in that Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or</b>'.</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>4.1.4</b> Reasoned justification</p>	<p>Amendments to paragraph: 'Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy S1 meets this requirement and adopts the model wording suggested. When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply <del>to</del><b>where</b> policies relating to <b>habitats sites (including</b> sites protected under the Birds and Habitats Directives) and/or designated as Sites of Special Scientific Interest (SSSIs) <b>apply, to development requiring appropriate assessment because of its potential impact on a habitats site,</b> to land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, <b>to</b> designated heritage assets and locations identified as at risk of flooding.'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
<p><b>Policy S2</b> Planning for the borough - our spatial development strategy</p>	<p>Amendments to paragraph: ‘ <b>(1) The housing requirement for Guildford is 630 dwellings per annum over the plan period (2015 – 2034). In addition to this and from 2019, an allowance of 42 dwellings per annum will be provided to contribute towards meeting unmet needs arising from Woking Borough Council. This contribution will be reviewed subsequent to Woking Borough Council reviewing their Local Plan in light of an updated objectively assessed housing need and any comprehensive Green Belt and other related studies.</b> During the plan period (2015-34), <del>we will make provision has been made</del> for at least <del>12,426</del><b>12,600</b> new homes. , <b>The contribution of all sources of housing supply are shown</b> <del>as per the total target (requirement) in Table S2a and</del><b>whilst their distributioned across the spatial locations is shown</b> identified in Table S2b.’</p> <p>Deletion of paragraph: ‘<del>(3) The delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year is as set out below, however, this is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision.</del>’</p>	<p>No new HRA implications.</p> <p>The spatial development strategy identifies an increase in the housing requirement during the plan period by 184 net new dwellings (i.e. an increase from 12,426 to 12,600). Whilst this increase in development has the potential to link to both increased atmospheric pollution and recreational pressure within European sites, both these impact pathways have previously been considered and the technical assessment within the June 2018 HRA referred to the Council’s SANG assessment produced to support the draft Local Plan 2016, which was based on an assumption of 13,860 dwellings to be delivered between 2013 and 2033. A total of 14,641 dwellings was captured in the traffic modelling for the air quality calculations (covering growth in Guildford from 2013 to 2033 but with a forecast year of 2031). As such a quantum of allocated residential development greater than the newly proposed 12,600 dwellings (2015 to 2034) has already been assessed, and this modification does not provide for any new or exacerbated impact pathways beyond those previously discussed in the June 2018 HRA and this modification can be</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
4.1.9a Reasoned justification	<p>Deletion of paragraph: <del>‘The figures set out in the Annual Housing Target table sum to a total of 12,426 homes. This is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target. It also adopts a phased target that gradually increases over time rather than the same annualised target of 654 homes each year. This is due to the likely rate of delivery, particularly on the strategic greenfield sites, which is dependent upon the delivery of necessary infrastructure expected to occur towards the end of the plan period.’</del></p> <p>Replacement paragraph: <b>‘National policy requires that we meet objectively assessed housing needs, including any unmet needs from neighbouring authorities, where it is practical to do so and consistent with achieving sustainable development. Guildford’s objectively assessed housing need has been based on a consideration of the latest 2018-based population projections. Applied to this demographic housing need is a necessary uplift to take account of market signals and affordable housing need, assumptions of future economic growth, and an increased growth in the student population.’</b></p>	<p>screened out.</p> <p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.1.9aa	Additional paragraph: <b>‘Guildford sits within the same housing market</b>	No HRA implications.

**Modification number**

**Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))**

**Potential HRA Implications**

Reasoned justification: Guildford Borough Submission Local Plan

**area (HMA) as Waverley and Woking borough councils. Waverley Borough Council has a recently adopted Local Plan that seeks to meet its full needs with an allowance to meet 50% of Woking’s unmet need. The extent of Woking’s unmet need has been based on the 2015 West Surrey Strategic Housing Market Assessment (SHMA). An allowance is also included within this plan to meet 20% of the remaining unmet need (630 homes over the plan period). This contribution will however be subject to a review after Woking Borough Council has reviewed their current Local Plan as the latest population and household projections indicate that the level of unmet need is lower than that assessed in the West Surrey SHMA (2015).’**

This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

Deletion of table:

Period	Year	Annual Housing Target	Annual Actual/ Projected Supply
Pre-adoption	2015/16	654	
	2016/17	654	
	2017/18	654	

Modification number    Type of Change (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))    Potential HRA Implications

	2018/19	654	
Years 1 – 5	2019/20	450	
	2020/21	450	
	2021/22	500	
	2022/23	500	
	2023/24	500	
Years 6 – 10	2024/25	550	
	2025/26	600	
	2026/27	700	
	2027/28	700	
	2028/29	700	



**Modification number**      **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))      **Potential HRA Implications**

Years 11 – 15	2029/30	800	
	2030/31	810	
	2031/32	850	
	2032/33	850	
	2033/34	850	
<b>TOTAL</b>	<b>12,426</b>		

**4.1.9ab**  
Reasoned justification:  
Guildford Borough Submission Local Plan

Addition of paragraph: **‘Our total housing supply over the plan period (2015-2034) is indicated in the table below and will comprise homes from a variety of sources in addition to the Local Plan’s site allocations.’**

Addition of table:  
**Table S2a: Sources of supply over the plan period: 2015 – 2034 (net number of homes).**

<b>Total target (requirement)</b>	<b>12,600</b>
-----------------------------------	---------------

No HRA implications.  
This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

**Modification number**      **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))      **Potential HRA Implications**

<b>Commitments (permissions / completions)</b>	<b>3,675 (980 / 2,695)</b>
<b>Site allocations</b>	<b>Approx. 9,972*</b>
<b>LAA sites not allocated</b>	<b>620</b>
<b>Windfall</b>	<b>750</b>
<b>Rural exception</b>	<b>90</b>
<b>Total supply over the plan period</b>	<b>15,107</b>

**\*This excludes current permissions / completions as part of these associated with allocations.**

**4.19ac**  
Reasoned justification:  
Guildford Borough Submission

Addition of paragraph: **‘Informed by our spatial development strategy, the anticipated distribution of housing as identified in the plan’s site allocations (and non-allocated LAA sites) is reflected in the table below.’**

Addition of table:

No HRA implications.  
This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

**Modification number**    **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))    **Potential HRA Implications**

Local Plan	<b>Table S2b: Spatial Strategy: Distribution of Housing 2015 – 2034 (net number of homes).</b>																	
	<table border="1"> <thead> <tr> <th data-bbox="501 485 904 628"><u><b>Spatial locations / settlements</b></u></th> <th data-bbox="904 485 1370 628"><u><b>Homes</b></u> (Site allocations + non-allocated LAA sites, excluding permissions and completions)</th> </tr> </thead> <tbody> <tr> <td data-bbox="501 628 904 703"><u><b>Guildford town centre</b></u></td> <td data-bbox="904 628 1370 703"><u><b>863</b></u></td> </tr> <tr> <td data-bbox="501 703 904 778"><u><b>Urban areas</b></u></td> <td data-bbox="904 703 1370 778"><u><b>1,443</b></u></td> </tr> <tr> <td data-bbox="501 778 904 853"><u>Guildford (incl. SARP)</u></td> <td data-bbox="904 778 1370 853"><u>1,399</u></td> </tr> <tr> <td data-bbox="501 853 904 928"><u>Ash and Tongham</u></td> <td data-bbox="904 853 1370 928"><u>44</u></td> </tr> <tr> <td data-bbox="501 928 904 1003"><u><b>Within villages</b></u></td> <td data-bbox="904 928 1370 1003"><u><b>154</b></u></td> </tr> <tr> <td data-bbox="501 1003 904 1110"><u><b>Land proposed to be inset in villages</b></u></td> <td data-bbox="904 1003 1370 1110"><u><b>252</b></u></td> </tr> <tr> <td data-bbox="501 1110 904 1224"><u><b>Previously Developed Land in Green Belt</b></u></td> <td data-bbox="904 1110 1370 1224"><u><b>195</b></u></td> </tr> </tbody> </table>		<u><b>Spatial locations / settlements</b></u>	<u><b>Homes</b></u> (Site allocations + non-allocated LAA sites, excluding permissions and completions)	<u><b>Guildford town centre</b></u>	<u><b>863</b></u>	<u><b>Urban areas</b></u>	<u><b>1,443</b></u>	<u>Guildford (incl. SARP)</u>	<u>1,399</u>	<u>Ash and Tongham</u>	<u>44</u>	<u><b>Within villages</b></u>	<u><b>154</b></u>	<u><b>Land proposed to be inset in villages</b></u>	<u><b>252</b></u>	<u><b>Previously Developed Land in Green Belt</b></u>	<u><b>195</b></u>
<u><b>Spatial locations / settlements</b></u>	<u><b>Homes</b></u> (Site allocations + non-allocated LAA sites, excluding permissions and completions)																	
<u><b>Guildford town centre</b></u>	<u><b>863</b></u>																	
<u><b>Urban areas</b></u>	<u><b>1,443</b></u>																	
<u>Guildford (incl. SARP)</u>	<u>1,399</u>																	
<u>Ash and Tongham</u>	<u>44</u>																	
<u><b>Within villages</b></u>	<u><b>154</b></u>																	
<u><b>Land proposed to be inset in villages</b></u>	<u><b>252</b></u>																	
<u><b>Previously Developed Land in Green Belt</b></u>	<u><b>195</b></u>																	

Modification number    Type of Change (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))    Potential HRA Implications

<b><u>Countryside beyond the Green Belt:</u></b> <u>Extension to Ash and Tongham</u>	<b><u>885</u></b>	
<b><u>Urban extensions to Guildford</u></b>	<b><u>3,350</u></b>	
<u>Gosden Hill Farm</u>	<u>1,700</u>	
<u>Blackwell Farm</u>	<u>1,500</u>	
<u>Land north of Keens Lane</u>	<u>150</u>	
<b><u>Urban extension to Godalming</u></b> <u>Aaron's Hill</u>	<u>200</u>	
<b><u>New settlement</u></b> <u>Former Wisley Airfield</u>	<b><u>2,000</u></b>	

**Modification number**      **Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))**      **Potential HRA Implications**

<u>Development around villages</u>	<u>1,250</u>
<u>Total</u>	<u>10,592*</u>

**\*This total excludes trend based housing supply (Windfall and rural exception) as well as completions and permissions, whether allocated or not.**

**4.1.9b**  
Reasoned justification:  
Guildford Borough Submission Local Plan

Amendments to paragraph: '**National policy requires that we are able to demonstrate a rolling five year housing land supply from the date of adoption.** ~~This phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five year supply of housing from the date of adoption, as required by national policy. This will also must take account of both the deficit accrued until that point and includes a 20 per cent buffer moved forward from later in the plan period.~~ Without a rolling five-year supply of homes **or where the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years, the policies which are most important for determining a planning application** ~~relevant policies for the supply of housing would not be considered up to date.'~~

No HRA implications.  
This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

**4.1.10**

Deletion of paragraph: '~~This is still a higher level of development than~~

No HRA implications.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
Reasoned justification	<p><del>experienced in Guildford borough during the previous Local Plan period, and represents an increase in new homes in line with the aims of NPPF and NPPG, and the best available information on the likely levels of development to 2034. The phased approach is related to assumptions on the most likely rate of delivery only and do not in any way preclude the earlier delivery of these sites where this is sustainable to do so'</del></p> <p><b>Replacement paragraph: 'National policy states that where possible the deficit accrued since the start of the plan period should be met within the first five years. Given the step change in housing requirement compared to past delivery rates which have been constrained by Green Belt policy, the accrued backlog at the date of adoption is significant. Whilst the plan includes numerous smaller sites capable of being delivered early in the plan period, there are a number of strategic sites that have longer lead in times. For these reasons, the backlog will be met over the plan period, using the Liverpool approach to calculating a rolling five year housing land supply rather than the Sedgefield approach. For the purposes of calculating the five year land supply, the deficit prior to adoption of the plan will be calculated against an annual requirement of 630 dwellings per annum (Guildford's OAN). From April 2019 onwards, following adoption of the plan, the annual requirement will increase to 672 dwellings per annum to account for a contribution towards Woking's unmet need.'</b></p>	<p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
4.1.11 Reasoned justification	<p>Minor changes: reformatting of sentences.</p> <p>Additional sentence: <b>'The expected phasing of sites is set out in the Housing Trajectory, included at Appendix 0. This will be updated annually in the Council's Monitoring Report.'</b></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
Monitoring indicators (box)	<p>Addition of paragraph: <b>'630 homes per annum (2015/16 – 2018/19), 672 homes per annum (2019/20 – 2033/34) 12,600'</b> into the 'target' column.</p> <p>Addition of paragraph: <b>'4 permanent pitches for Gypsies and Travellers; 4 permanent plots for Travelling Showpeople (as defined by Planning Policy for Traveller Sites);To seek to make provision for 41 permanent Gypsy and Traveller pitches, 4 permanent plots for Travelling Showpeople for households who do not meet the planning definition, and 8 permanent pitches for households of unknown planning status'</b> into 'target' column.</p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.1.14 Introduction	<p>Addition of the paragraph: <b>'The NPPF states that policies should recognise that residential development often plays an important role in ensuring the vitality of centres and therefore should encourage residential development on appropriate sites. The Council is committed to ensuring that the policies and allocations within the Local Plan, including those within the Guildford Town Centre, are deliverable and its objectives are realised over the plan period. Furthermore, the Council remains committed to supporting</b></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p>any further opportunities for future development and regeneration within the town centre that reinforces its important role and function. The Guildford Town Centre is intended to function as the key focus for a more intense vibrant mix of uses including residential, office, retail, leisure, tourism, entertainment, and arts and cultural facilities.'</p>	
<p><b>4.1.15</b> Introduction</p>	<p>Addition of the paragraph: <b>'The Council is facilitating the delivery of development through a range of proactive measures. These include:</b></p> <ul style="list-style-type: none"> <li>• Driving and unlocking key development projects that form a basis for the delivery of the Local Plan (such as at North Street, A6; Guildford Park Road and Bright Hill car parks, A11 and A12);</li> <li>• Playing a lead role, working with other delivery partners, in infrastructure interventions that realise growth and regeneration opportunities;</li> <li>• Advancing and collaborating on key regeneration opportunities as part of the Guildford Town Centre Regeneration Strategy, which include leveraging its own landholdings as part of efforts to promote mixed use and higher density development supporting the vitality and vibrancy of the town centre.'</li> </ul>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>4.1.16</b> Introduction</p>	<p>Addition of the paragraph: <b>'In undertaking and further to these actions, the Council will explore the use of a range of mechanisms at its disposal to support regeneration and the accelerated development of housing and mixed-use schemes. These include using, where appropriate, compulsory purchase powers, granting permission in principle, assisting in land assembly and playing a</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
4.1.17 Introduction	<p>coordinating role with its development partners around development opportunities.'</p> <p>Addition of the paragraph: <b>'The borough's town centre will form the key focus for these measures to support and accelerate growth in this sustainable location and maximise the use of previously developed land. This will occur with careful attention to the Local Plan's design policies, Development Management policies, the provisions of any possible future Area Action Plan, as well as relevant SPDs including guidance on strategic views into and out of the town centre which will help to guide the appropriate location, form, scale and massing of development.'</b></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>Policy S3</b> Delivery of development and regeneration within Guildford Town Centre</p>	<p>Addition of entire policy: <b><u>Coordination of development in the Town Centre</u></b></p> <p><b>(1) Development proposals will be encouraged to seek opportunities to enable the future development potential of adjacent sites and not undermine their development potential.</b></p> <p><b><u>More efficient use of land and the acceleration of housing delivery</u></b></p> <p><b>(2) Major applications will be expected to deliver a mix of uses and include residential development. Residential development in mixed use schemes will be expected to meet identified housing need.</b></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
---------------------	--	----------------------------

**(3) Schemes must demonstrate that they have made the most efficient use of land both in terms of the quantum of development and the mix of uses.**

**(4) In seeking to achieve more efficient use of land and/or accelerated housing delivery and/or regeneration, the Council will where appropriate utilise mechanisms such as its compulsory purchase powers.**

**Place shaping and character and design of new development**

**(5) New development will have regard to:**

- (a) the provisions of Policy D1;**
- (b) the historic environment, street pattern and topography;**
- (c) important views into and out of the town centre from the surrounding landscape;**
- (d) views within the town centre of important historic buildings and local landmarks.**

**(6) Schemes must demonstrate high quality urban design and contribute wherever possible to achieving:**

- (a) mixed use developments with active ground floor uses;**
- (b) defined public and private spaces which are well-enclosed;**
- (c) an attractive and safe public realm;**



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p>(d) legible routes that are easy to understand and to move through, and give priority to pedestrians and cyclists over motor vehicles;</p> <p>(e) improved access and views to the River Wey.</p>	
<p><b>4.1.18</b> Reasoned justification</p>	<p>Additional paragraph: <b>Our Corporate Plan (2018-2023) identifies regenerating and improving Guildford town centre and other urban areas as one of three strategic priorities supporting its “Place Making” theme. Key projects to support this and the delivery of the Local Plan include:</b></p> <p>(a) <b>Facilitating the delivery of a major new mixed development in North Street</b></p> <p>(b) <b>Implementing the vision of the Town Centre Regeneration Strategy</b></p> <p>(c) <b>Improving the public realm, including surfaces, in key town centre areas’</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>4.1.19</b> Reasoned justification</p>	<p>Additional paragraph: <b>This policy and the Town Centre Regeneration Strategy will help deliver the following objectives:</b></p> <p>(a) <b>enhance the vibrancy of Guildford Town Centre</b></p> <p>(b) <b>create and foster high quality design</b></p> <p>(c) <b>protect the town’s heritage and overall feel</b></p> <p>(d) <b>respect existing townscape at both the street and roof level</b></p> <p>(e) <b>create an enhanced and more positive public realm</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<ul style="list-style-type: none"> <li>(f) reduce the concrete environment atmosphere</li> <li>(g) realise the Council’s ‘drive to, not through’ concept to reduce the impact of traffic in the town centre, complementing future environmental improvements</li> <li>(h) link the Town Centre to the train station</li> <li>(i) open up the River Wey and improve connections to the river</li> <li>(j) assist in meeting Guildford’s housing demand</li> <li>(k) ensure schemes are sustainable and do not lock future development potential</li> <li>(l) promote and create an investment friendly environment’</li> </ul>	
<p><b>4.1.20</b> Reasoned justification</p>	<p>Additional paragraph: <b>‘The delivery of housing in the town centre adds to its vitality and vibrancy. The Council regards the town centre as critical in terms of meeting needs for main town centre uses. This includes high trip generating uses such as offices and retail, where there are opportunities to encourage linked trips and maximise the use of public transport networks. However, the town centre also represents the most sustainable location for new higher density housing. Whilst the Local Plan provides for sufficient sites to meet housing needs over the plan period, as part of regeneration efforts, more housing is likely to come forward over the plan period. It is important that this occurs in a manner that makes the most of its central location and is thus developed at a density that maximises its sustainability benefits whilst responding to heritage, design and flooding considerations. Consideration should also be</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
4.1.21 Reasoned justification	<p>given to the potential to minimise the provision of car parking where this can help optimise the density of development.'</p> <p>Additional paragraph: <b>'The Council will support mixed use development, which can retain or re-provide retail, leisure and employment uses/floorspace in the town centre, in line with national and Local Plan policies. This will help ensure the efficient use of land and presents an opportunity to enhance the vitality of the town centre and increase delivery of homes in sustainable locations.'</b></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.1.22 Reasoned justification	<p>Additional paragraph: <b>'Enhancing the vitality and vibrancy of the town centre cannot occur solely through more intense uses, nor greater numbers of residents. A quality public realm needs to support day-to-day activities, peoples' well-being, safety and sense of place and forms the basis for the area's attractiveness to residents, workers and visitors.'</b></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.1.23 Reasoned justification	<p>Additional paragraph: <b>'The public realm includes publicly-owned streets, squares, pathways, parks, publicly accessible open spaces, right of ways, and any public or private building and facilities that are accessible by all. Whilst parts of the town centre reflect high quality public environments, there are areas where this could be improved. This is often in areas that represent opportunities for regeneration and intensification of development.'</b></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.1.24	<p>Additional paragraph: <b>'The enhancement of the public realm and its</b></p>	<p>No HRA implications.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications						
Reasoned justification	<p>amenity value will ensure the town centre becomes an even more attractive place to live, work and visit and will be a key component of the area’s regeneration. This could occur through a range of interventions such as improving surfacing of public space, providing more generous pedestrian environments, landscaping, street furniture, lighting and public art. The Council will seek contributions toward the improvement of the public realm from developments, where appropriate. The Council will also continue working with Surrey County Council to implement measures that deliver public realm enhancements.’</p>	<p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>						
Key evidence (box)	<p>Addition of the sentence:  <b>‘Key Evidence</b></p> <ul style="list-style-type: none"> <li>• The Guildford Town Centre Regeneration Strategy (Guildford Borough Council, 2017)’</li> </ul>	<p>No HRA implications.            This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>						
Monitoring (box) Indicators	<p>Addition of the table:  <b>‘Monitoring Indicators</b></p> <table border="1" data-bbox="414 1093 1243 1268"> <thead> <tr> <th>Indicator</th> <th>Target</th> <th>Data source</th> </tr> </thead> <tbody> <tr> <td>The number of new homes completed each</td> <td>N/A</td> <td>Planning applications and appeals’</td> </tr> </tbody> </table>	Indicator	Target	Data source	The number of new homes completed each	N/A	Planning applications and appeals’	<p>No HRA implications.            This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
Indicator	Target	Data source						
The number of new homes completed each	N/A	Planning applications and appeals’						

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications				
	<table border="1"> <tr> <td data-bbox="403 399 784 470">year in the town centre</td> <td data-bbox="784 399 896 470"></td> <td data-bbox="896 399 1232 470"></td> <td data-bbox="1232 399 1366 470"></td> </tr> </table>	year in the town centre				
year in the town centre						
<p><b>Policy H1</b></p>	<p>Amendments to paragraph: ‘(2) Development that results in the net loss of <del>all existing</del> housing, including sites allocated for housing within the Local Plan will not be permitted. Development that results in the net loss of (C2 use class or C3 use class accommodation or traveller accommodation), including sites allocated for such use in the Local Plan, will not be permitted. <b>Significant reductions from the approximate housing numbers or reductions from the specific traveller accommodation provision and housing uses as set out in the site allocations will be resisted.</b>’</p> <p>Amendments to paragraph: ‘(3) On residential development sites of 25 homes or more, 10% of new homes will be required to meet Building Regulations M4 (2) category 2 standard (<del>to be</del> <b>‘accessible and adaptable dwellings’</b>), and 5% of new homes will be required to meet Building Regulations M4 (3)(b) category 3 (<del>‘wheelchair user accessible dwellings standard’</del>), or any subsequent legislation on making homes accessible and adaptable.</p> <p>Additional paragraph: <b>‘All new residential development must conform to the nationally described space standards as set out by the Ministry of Housing, Communities and Local Government (MHCLG).’</b></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>				

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p>Deletion of paragraph: <b>(6) Sufficient sites are allocated within the Local Plan to meet the accommodation needs of Gypsies, Travellers or Travelling Showpeople (as defined by Planning Policy for Traveller Sites) as set out in the latest Traveller Accommodation Assessment as well as to cater for the potential additional needs of households of unknown planning status. These sites are for a mix of tenures and provided on a number of small sites and as part of larger development sites to help create sustainable and mixed communities. Sites are also allocated within the Local Plan to contribute to meeting the assessed needs of Gypsies, Travellers and Travelling Showpeople who do not meet the Planning Policy for Traveller Sites definition.'</b></p>	
<p><b>4.2.1a</b> Definitions</p>	<p>Addition of sentence: <b>'Existing housing' in H1 (2) means housing in existence at the time of the planning application.'</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>4.2.10</b> Accessible accommodation and housing for older people</p>	<p>Addition of sentence: <b>'Accessible dwellings should be provided on parts of residential development sites that are not designated for self-build and custom-build houses.'</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>4.2.22</b></p>	<p>Amendments to the policy read: <b>'The identified traveller</b></p>	<p>No HRA implications.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
Gypsy, Traveller and Travelling Showpeople pitches and plots	<p><del>identified</del> <b>accommodation target is set out in Policy S2 (3).</b> Sufficient sites are <del>identified</del> <b>allocated</b> within the Local Plan to meet <b>the target based on</b> the accommodation need <b>identified in the TAA (2017)</b> for 4 permanent pitches for Gypsies and Travellers and 4 plots for Travelling Showpeople up to 2034. <b>There are also sufficient allocated sites to make provision for 8 permanent pitches to meet potential additional need of households of unknown planning traveller status. These allocated sites are for a mix of tenures and provided on a number of small sites and as part of larger development sites to help create sustainable and mixed communities.'</b></p>	This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
<p><b>4.2.23</b> Gypsy, Traveller and Travelling Showpeople pitches and plots</p>	<p>Minor changes: reformatting of sentence structure to reflect the council's intentions to provide permanent pitches for Gypsy, Traveller and Travelling Showpeople.</p> <p>Addition of sentence: <b>'A total of 59 Gypsy and Traveller pitches (net) and 8 Travelling Showpeople plots (net) have been identified in the site allocation policies.'</b></p> <p>Deletion of sentence: <del>'We will also seek to make provision for 8 permanent pitches to meet potential additional need of households of unknown planning traveller status.'</del></p> <p>Addition of sentence: <b>'The Council will keep this position under review and, should the need for a transit site arise, will work with</b></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
<b>neighbouring authorities to address this.'</b>		
<b>4.2.24</b> Gypsy, Traveller and Travelling Showpeople pitches and plots	Minor changes: reformatting of sentence structure to reflect the council's proposals to provide suitable accommodation sites for Gypsy, Traveller and Travelling Showpeople.	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
<b>4.2.27d</b> Gypsy, Traveller and Travelling Showpeople pitches and plots	Minor changes: reformatting of sentence structure to provide clarity that development of flats are unsuitable as self-build projects.	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
<b>Policy H2</b> Affordable homes	Amendments to the policy read: ' <del>The Council</del> <b>We will also seek affordable homes on sites providing five<sup>10</sup> or more homes (gross), or sites of 0.17 ha or more regardless of the number of homes or where dwellings would have a combined gross internal floorspace of more than 1,000 square metres. We</b> The Council will seek at least 40% per cent of the homes on these sites as affordable homes.'	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Addition of paragraph : ' <b>In Designated Rural Areas, the threshold</b>		

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
---------------------	--	----------------------------

where we will seek an affordable housing contribution of at least **40% of the homes on these sites will be on sites providing more than 5 dwellings. For developments of between 6 and 10 dwellings inclusive (gross), or where dwellings have a combined gross internal floorspace of more than 1,000 square metres, a financial contribution in lieu of on-site provision of affordable housing will be sought which is of broadly equivalent value relative to on-site provision.**

Addition of sentence within paragraph 3: **'A minimum of 10% of the affordable homes provided on each site under this policy must be available for affordable home ownership, except where an exemption applies in the NPPF.'**

Addition of sentence within paragraph 4: **'The agreed off-site provision must be completed before 50% of the market homes are occupied unless otherwise agreed by the Council. On developments in designated rural areas of between 6 and 10 dwellings inclusive (gross), or where dwellings have a combined gross internal floorspace of more than 1,000 square metres, the commuted payment in lieu of on-site affordable housing provision will be payable after completion of the units within the development.'**

Addition of paragraph 4a: **'If developers satisfactorily demonstrate that providing the amount of affordable housing required by this**



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p>policy would not be economically viable, the Council will consider the following to assist with delivering a scheme:</p> <p>(a) varying the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; and/or</p> <p>(b) reducing the overall number of affordable homes.'</p>	
<p><b>4.2.33a</b> Definitions</p>	<p>Additional paragraph: <b>'Designated Rural Areas' are rural areas described under section 157(1) of the Housing Act 1985, which includes National Parks, Areas of Outstanding Natural Beauty and other areas designated by order of the Secretary of State as a rural area. These are areas designated as rural by the Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the South East) Order 1997 or as Designated Protected Areas by the by the Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 (Statutory Instrument 2009 No. 2098). Within Guildford borough, they include the following parishes: Albury, East Clandon, Effingham, Normandy, Ockham, Pirbright, Puttenham, Ripley, Seale and Sands, Shackleford, Shalford, Shere, Wanborough, West Clandon, West Horsley (as defined on map available from the Homes and Communities Agency – see <a href="https://www.gov.uk/government/publications/designated-protected-areas">https://www.gov.uk/government/publications/designated-protected-areas</a>) and Wisley.'</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
4.2.35 Reasoned justification	Deletion of sentence: ' <del>Assisted living, extra care and other C2 residential developments may be required to make provision; these will be considered on a case-by-case basis.</del> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.2.36 Off-site provision and payments in lieu of on-site provision	Minor changes: reformatting of sentences to reflect the council's aims to provide affordable housing to contribute towards mixed communities.	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.2.38 Viability	Additional sentence to the end of the paragraph: ' <b>Bearing in mind that viability assessment was undertaken in preparation of the Local Plan, the impact of policies on development viability have been considered and are regarded as realistic. The need for a viability assessment at planning application stage will thus need clear justification by the applicant in line with paragraph 57 of the NPPF. Should this need be accepted, the Council will need to weigh the outcomes and implications of the viability assessment against all circumstances relating to the case as part of considering the acceptability of the proposal.</b> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.2.40 Viability	Removal of paragraph: ' <del>There may be some circumstances where abnormal costs would make the scheme unviable to deliver. Where developers demonstrate to our satisfaction that providing the amount of</del>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p><del>affordable housing required by this policy would not be economically viable, we may consider the following to assist with delivering a scheme:</del></p> <p><del>(c) — vary the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided</del></p> <p><del>(d) — reduce the overall number of affordable homes<sup>1</sup></del></p>	<p>European sites.</p>
<p>Key evidence (box)</p>	<p>Amendments to Key Evidence box:</p> <ul style="list-style-type: none"> <li>• ‘Tenancy Strategy (Guildford Borough Council, 2013)</li> <li>• Guildford Housing Strategy 2015 – 2020 (Guildford Borough Council, 2015)</li> <li>• West Surrey Strategic Housing Market Assessment (Guildford Borough Council, 2015) and Guildford Addendum Report 2017</li> <li>• <del>Guildford Local Plan Viability and Affordable Housing Study (Guildford Borough Council, 2014)</del></li> <li>• <b>Local Plan and CIL Viability Study (Guildford Borough Council, 2016)</b></li> <li>• <b>Local Plan Viability Update (Guildford Borough Council, 2017)</b></li> <li>• Traveller Accommodation Assessment (Guildford Borough Council, 2017)<sup>1</sup></li> </ul>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>Policy H3</b> Rural exception homes</p>	<p>Amendments to policy: ‘(1) Small <b>scale</b> affordable housing developments <b>in the Green Belt, which can include</b> including pitches for <del>travellers</del><b>Gypsies and Travellers not meeting the Planning Policy</b></p>	<p>No new HRA implications.</p> <p>Whilst this policy was previously subject to Appropriate Assessment, the modifications</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p><b>for Traveller Sites definition of a gypsy or traveller</b> , will be permitted to meet identified local affordable housing needs provided that:</p> <ul style="list-style-type: none"> <li>(a) the site adjoins or is closely related to, and in safe and reasonable walking distance of a <del>defined or a non-defined</del> rural settlement, and</li> <li>(b) the number, size and tenure of homes would be appropriate to meet, or to contribute to meeting, the identified affordable housing needs of the local community , and</li> <li>(c) the affordable homes are all secured in perpetuity.</li> </ul> <p><b>(2) The minimum number of market homes to make a rural exception scheme viable will be permitted where:</b></p> <ul style="list-style-type: none"> <li><b>(a) a developer demonstrates that the scheme would be unviable without the inclusion of market housing, and</b></li> <li><b>(b) it does not inflate the threshold land value , and</b></li> <li><b>(c) it is suitably integrated into the rural exception development.'</b></li> </ul>	<p>provided do not raise new linking impact pathways or accentuate those previously identified. As such this modification can be screened out.</p>
<p><b>4.2.49</b> Reasoned justification</p>	<p>Amendments to policy: 'We will work with parish councils, the Surrey Rural Housing Enabler and landowners to understand the affordable housing needs of people with a local connection to specific rural areas. In applying this policy, consideration will be given to the needs of the local community by accommodating households who <b>are current or</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p><b>recent former residents of the Parish of</b> have a current employment or family connection <b>to it</b>, <del>or are current or recent former residents of the Parish.</del> We will also facilitate provision of rural exception sites for local agricultural workers, and for local <b>settled</b> travellers <del>needs who don't meet the Planning Policy for Traveller Sites definition of gypsy or traveller</del> where such an <b>accommodation</b> need is demonstrated <b>in line with Policy H3 (1)</b>. Traveller <b>rural</b> exception housing accommodation will be provided on council-owned public pitches on small, suitably located sites in the Green Belt.'</p>	
<p><b>4.2.50</b> Reasoned justification</p>	<p>Deletion of sentence: 'The need for affordable pitches for Travellers' accommodation is reported in Guildford's Traveller Accommodation Assessment 2013.'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>4.2.52</b> Reasoned justification</p>	<p>Removal of paragraph: 'There may be situations where a developer demonstrates that a rural exception scheme would be unviable. In such situations, and where there are no alternative sites available to provide the identified local affordable housing needs (as required by national policy) we may consider permitting the minimum number of market homes to make the scheme viable. We may also consider allowing at least one market home where this would result in a significant improvement in the housing mix (tenure, type or size) or rent levels. The inclusion of market housing must serve to benefit the rural affordable housing stock and not inflate the "threshold land value". This is the minimum land value likely to trigger an owner to sell the land.'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
<p><b>4.2.53</b> Reasoned justification</p>	<p>Deletion of sentence at the end of paragraph: ‘<del>Any market housing must improve the mix of market housing in the village, and must be integrated into the rural exception development.</del>’</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p>Key Evidence (box)</p>	<p>Amendment of Key Evidence box:</p> <ul style="list-style-type: none"> <li>• Parish housing needs surveys (various dates)</li> <li>• West Surrey Strategic Housing Market Area Assessment (Guildford Borough Council, 2015) and Guildford Addendum Report 2017</li> <li>• <del>Local Plan Viability and Affordable Housing Study (Guildford Borough Council, 2014) and update 2016</del></li> <li>• <b>Local Plan and CIL Viability Study (Guildford Borough Council, 2016)</b></li> <li>• <b>Local Plan Viability Update (Guildford Borough Council, 2017)</b></li> <li>• Tenancy Strategy (Guildford Borough Council, 2013)</li> <li>• Guildford Housing Strategy 2015-2020 (Guildford Borough Council, 2015)</li> <li>• Traveller Accommodation Assessment (Guildford Borough Council, 2017)</li> </ul>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>Policy P1</b> Surrey Hills Area of Outstanding Natural Beauty and Area of</p>	<p>Minor changes: reformatting of sentences and re-wording that reflects the council’s aims to keep in line within areas Area of Outstanding Natural Beauty AONB designation.</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications						
Great Landscape Value								
4.3.6 Reasoned justification	Amendment to paragraph: 'In considering major applications in the AONB, the Council will have regard to the criteria outlined in Paragraph <del>172446</del> of the NPPF. Whether a proposal constitutes 'major development' will be considered on a case-by-case basis, taking into account relevant factors such as the <del>naturesize</del> , scale and setting of the proposed development, <b>and whether it could have a significant adverse impact on the purposes for which the area has been designated.</b> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.						
4.3.8 Reasoned justification	Addition of sentence to paragraph: ' <del>...not be given any greater status than their current AGLV designation.</del> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.						
Monitoring Indicators (box)	Amendment to table: <table border="1" data-bbox="412 1023 1350 1254"> <thead> <tr> <th data-bbox="412 1023 792 1098">Indicator</th> <th data-bbox="792 1023 1095 1098">Target</th> <th data-bbox="1095 1023 1350 1098">Data source</th> </tr> </thead> <tbody> <tr> <td data-bbox="412 1098 792 1254"><del>Percentage of appeals allowed for applications for</del> <b>Number of planning decisions, including</b></td> <td data-bbox="792 1098 1095 1254"><del>Reduction in the percentage of appeals allowed</del></td> <td data-bbox="1095 1098 1350 1254"><b>Planning permissions and appeals.</b></td> </tr> </tbody> </table>	Indicator	Target	Data source	<del>Percentage of appeals allowed for applications for</del> <b>Number of planning decisions, including</b>	<del>Reduction in the percentage of appeals allowed</del>	<b>Planning permissions and appeals.</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Indicator	Target	Data source						
<del>Percentage of appeals allowed for applications for</del> <b>Number of planning decisions, including</b>	<del>Reduction in the percentage of appeals allowed</del>	<b>Planning permissions and appeals.</b>						

**Modification number**      **Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))**      **Potential HRA Implications**

	<b>appeals, allowing major development in the AONB on sites not allocated in the Plan.</b>	<b>N/A</b>		
<p><b>4.3.12</b> Green Belt</p>	<p>Minor changes; reformatting of paragraph to reflect the villages that are within the council's '<i>Green Belt designation</i>'.</p>			<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>4.3.13</b> Green Belt</p>	<p>Minor changes: reformatting of paragraph to establish which villages are not with the council's '<i>Green Belt designation</i>'.</p>			<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>4.3.17</b> Green Belt</p>	<p>Deletion of sentence in paragraph: '<del>The Green Belt boundary has also been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence.</del>'</p>			<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>Policy 2</b> Green Belt</p>	<p>Amendments to entire policy: '(1) The Metropolitan Green Belt <del>will continue to be protected</del>, as designated on the Policies Map, <b>will continue to be protected</b> against inappropriate <b>development in accordance with the NPPF</b>. <del>In accordance with national planning policy, the construction of new development will be considered inappropriate and</del><b>inappropriate development</b> will not be permitted</p>			<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
---------------------	---	----------------------------

unless very special circumstances can be demonstrated. **Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm is clearly outweighed by other considerations.**

~~(2) Certain forms of development are not considered to be inappropriate. Proposals will be permitted where they are consistent with the exceptions listed in national planning policy and, where relevant, also meet the following criteria:~~ The construction of new buildings in the Green Belt will constitute inappropriate development, unless the buildings fall within the list of exceptions identified by the NPPF. For the purpose of this policy, the following definitions will apply to those exceptions:

Extensions or alterations

~~(3) The extension or alteration of a building provided that it would not result in disproportionate additions over and above the size of the original building.~~

**(a) The “original building” shall mean either:**

- i. the building as it existed on 1 July 1948; or**
- ii. if no building existed on 1 July 1948, then the first building as it was originally built after this date**

Replacement buildings



**Modification number      Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))      Potential HRA Implications**

~~(4) — The replacement of a building, provided the new building:~~  
~~(a) — would be in the same use, and~~  
~~(b) — is not materially larger than the one it replaces, and~~  
~~(c) — is sited on or close to the position of the existing building.~~  
**(b) A new building will only constitute a “replacement” if it is sited on or in a position that substantially overlaps that of the original building, unless it can be clearly demonstrated that an alternative position would not increase the overall impact on the openness of the Green Belt.**

Limited infilling

**(c) “limited infilling” shall mean:**

i. Limited infilling within the identified settlement boundaries, as designated on the Policies Map, of the following villages. **Limited infilling may also be appropriate outside the identified settlement boundaries where it can be demonstrated that the site should be considered to be within the village.**

Albury, Compton, East Clandon, East **Horsley and West** Horsley (~~north~~~~south~~), Gomshall, Holmbury St Mary, Peaslake, Pirbright, Puttenham, Ripley, Shere, West Clandon and Worplesdon.

ii. **Limited infilling may also be appropriate outside the inset**



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p><b>settlement boundaries, as designated on the Policies Map, of the following villages where it can be demonstrated that the site should be considered to be within the village.</b></p> <p><b>Ash Green, Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, West Horsley and Wood Street Village.</b></p> <p>iii. Limited infilling may also be appropriate <del>either outside the inset or identified settlement boundaries, or</del> and in the following villages, where it can be demonstrated that the site <del>is as a matter of fact</del> <b>should be considered to be</b> within the village:</p> <p>Artington, Eashing, Farley Green, Fox Corner, Hurtmore, Ockham, Seale, Shackleford, The Sands, Wanborough and Wisley.</p> <p><b>(3) Certain other forms of development are also considered not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, and these are listed in the NPPF.'</b></p>	
<p><b>4.3.18</b> Reasoned justification</p>	<p>Minor changes made: references have been updated to the appropriate paragraphs for Policy P2: Green Belt.</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
<p><b>4.3.19</b> Reasoned justification</p>	<p>Deletion of paragraph: ‘Further clarification is provided below in relation to extensions or alterations of buildings, replacement buildings and limited infilling. We will also prepare a Green Belt Supplementary Planning Document (SPD) which will provide further detail and guidelines to help inform development proposals’.</p> <p>Addition of paragraph: ‘<b>In assessing proposals, account will be taken of the forthcoming Green Belt Supplementary Planning Document (SPD), which will be prepared to support this policy. This will set out guidelines and considerations that the Council will take into account when assessing Green Belt planning applications. This will help provide greater clarity to any applicants.’</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>4.3.20</b> Extensions or alternations</p>	<p>Deletion of paragraph: ‘In assessing whether an extension or alteration is disproportionate, account will be taken of the forthcoming Green Belt Supplementary Planning Document (SPD), which will be prepared to support this policy. This will set out guidelines including guidance on the scale of development that the Council is likely to consider appropriate and how this will be calculated. This will help provide greater clarity to any applicants wishing to extend their homes although any guideline figures therein would still need to be considered in relation to other design criteria.’</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p><b>4.3.21</b> Extensions or</p>	<p>Deletion of paragraph: ‘For the purpose of this policy, the original building is defined as the building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally. For the avoidance of doubt, if</p>	<p>No HRA implications. This modification does not provide for any new or</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
alternations	<del>no building existed on 1 July 1948, then the original building is considered to be the first building as it was originally built after this date.</del>	elevated potential impact pathways linking policy to European sites.
4.3.22	Deletion of paragraph: <del>'In assessing whether the replacement building is materially larger, account will also be taken of the forthcoming Green Belt Supplementary Planning Document (SPD) which will provide guidance on the scale of development which is likely to be considered appropriate.'</del>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.3.23	Deletion of paragraph: <del>'Replacement buildings are expected to be sited on or close to the position of the original building, unless it can be clearly demonstrated that an alternative position would reduce the overall impact on the openness of the Green Belt.'</del>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.3.24 Limited infilling	Amendments to paragraph: <del>'Development within villages in the Green Belt is limited to small scale infilling. This reflects the need to protect the openness of the Green Belt. Case law has now established that this exception</del> <b>limited infilling</b> is applicable to all villages and not restricted to sites that fall within identified settlement boundaries in local plans. Instead, the decision-maker is required to consider whether the site is, <del>as a matter of fact,</del> <b>located within the village, identified boundaries being at most a relevant consideration. The policy defines, and applies to, all those settlements in the borough which are considered to be villages and in which limited infilling may therefore be appropriate.'</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications						
4.3.25 Limited infilling	Additional sentence: <b>‘There are a number of considerations to take account of when assessing whether a site is located within the village. This includes factors such as the pattern of development, and the proposed development’s relationship to the built up area of the village and the surrounding countryside.’</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.						
Monitoring Indicators	<p>Changes to table:</p> <table border="1" data-bbox="412 644 1361 1066"> <thead> <tr> <th data-bbox="412 644 734 719">Indicator</th> <th data-bbox="734 644 1043 719">Target</th> <th data-bbox="1043 644 1361 719">Data source</th> </tr> </thead> <tbody> <tr> <td data-bbox="412 719 734 1066"><del>Percentage of appeals allowed involving</del> <b>Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt</b></td> <td data-bbox="734 719 1043 1066">Reduction in the percentage of appeals allowed  N/A</td> <td data-bbox="1043 719 1361 1066"><b>Planning permissions and appeals</b></td> </tr> </tbody> </table>	Indicator	Target	Data source	<del>Percentage of appeals allowed involving</del> <b>Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt</b>	Reduction in the percentage of appeals allowed  N/A	<b>Planning permissions and appeals</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Indicator	Target	Data source						
<del>Percentage of appeals allowed involving</del> <b>Number of planning decisions, including appeals, granting permission for inappropriate development in the Green Belt</b>	Reduction in the percentage of appeals allowed  N/A	<b>Planning permissions and appeals</b>						
4.3.31 Introduction	Amendments to paragraph: ‘The remaining land designated as countryside on the Policies Map lies immediately to the west and south of the urban area. It <del>and</del> forms the <del>natural</del> boundary of the Blackwater Valley <b>to the west and the A31 to the south</b> . The Blackwater Valley contains the A331, which connects the A31 and Tongham in the south with Ash Vale in the north and Frimley beyond. It also provides an	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.						

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications						
4.3.32a	<p>important open gap between Ash and Tongham, and the town of Aldershot to the west.'</p> <p>Additional paragraph: <b>'It also covers the area of land between the extended Ash and Tongham urban area and Ash Green village. This provides an important anti-coalescence role that prevents further merging between the Ash and Tongham urban area and Ash Green village.'</b></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>						
Policy P3: Countryside	<p>Minor changes made: <b>'Ash Green village'</b> was added to the policy to prohibit development that leads to greater physical or visual coalescence with the wider countryside.</p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>						
4.3.34a	<p>Additional paragraph: <b>'Significant growth is planned to occur to the south eastern corner of the previously defined Ash and Tongham urban area. Whilst an element of merging will occur between the urban area and the northern extent of Ash Green village, it is important that this is limited to this area to protect the separate identities of these settlements. Any development within the remaining area of land that is designated countryside will be strongly resisted.'</b></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>						
Monitoring Indicators	<p>Changes to table:</p> <table border="1" data-bbox="412 1177 1361 1254"> <thead> <tr> <th data-bbox="412 1193 770 1235">Indicator</th> <th data-bbox="770 1193 1039 1235">Target</th> <th data-bbox="1039 1193 1361 1235">Data source</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Indicator	Target	Data source				<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
Indicator	Target	Data source						

**Modification number**      **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))      **Potential HRA Implications**

	<p>Percentage of appeals allowed for applications for new buildings in the inset villages</p> <p><b>Number of planning decisions, including appeals, granting permission for development in the countryside that is not in accordance with the policy.</b></p>	<p>Reduction in the percentage of appeals allowed</p> <p><b>N/A</b></p>	<p>Planning <b>permissions and</b> appeals.</p>	
<p>4.3.36 Flooding, flood risk and groundwater protection</p>	<p>Additional sentence: '<b>...the Environment Agency and Thames Water, with regard</b> <del>in regards...</del>'</p>			<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p>4.3.37</p>	<p>Minor changes made: rewording and reformatting of sentences.</p>			<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p>4.3.42</p>	<p>Minor changes made: rewording and reformatting of sentences.</p>			<p>No HRA implications.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
Policy 4	<p>Minor changes made to the policy: '(2) Development in areas at <b>medium or high</b> risk of flooding, as identified on the latest Environment Agency flood risk maps and the Council's Strategic Flood Risk Assessment, including the 'developed' flood zone 3b (functional floodplain), will be permitted provided that:</p> <ul style="list-style-type: none"> <li>(a) the vulnerability of the proposed use is appropriate for the level of flood risk on the site</li> <li>(b) the proposal passes the sequential and exception test (where required) as outlined in the NPPF and Government guidance</li> <li>(c) a site-specific flood risk assessment demonstrates that the development, including the access and egress, will be safe for its lifetime, taking into account climate change, without increasing flooding elsewhere, and where possible, will reduce flood risk overall</li> <li>(d) the scheme incorporates flood protection, flood resilience and resistance measures appropriate to the character and biodiversity of the area and the specific requirements of the site</li> <li>(e) when relevant, appropriate flood warning and evacuation plans are in place and approved and</li> <li>(f) site drainage systems are appropriately designed, taking account of storm events <b>and flood risk of</b> up to 1 in 100 year chance <del>of flooding</del> with an appropriate allowance for climate change.</li> </ul>	<p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p> <hr/> <p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p>(3) Development proposals in the ‘developed’ flood zone 3b will also only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) <b>and there will be no increase in development</b> vulnerability. Proposals within these areas should facilitate greater floodwater storage.’</p>	
4.3.44	<p>Minor changes made: ‘Within each flood zone new development should be directed to areas of lowest risk first and, following this, to areas suited to the vulnerability of the proposed use. Land-uses considered to be most vulnerable to flooding must be located in areas of lowest flood risk first unless <b>it can be shown that there are</b> <del>there are demonstrated to be</del> overriding reasons to prefer a different location. NPPG will be referred to when assessing the vulnerability of a land use to flood risk. Its definition of ‘essential infrastructure’ will also be utilised in assessing planning applications in the undeveloped functional floodplain.’</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.3.45	<p>Minor changes made: rewording of sentences.</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.3.48	<p>Additional sentence added to paragraph: ‘However, to ensure effective use over their life course, the Council will require appropriate funding to implement management and maintenance <b>requirements for any proposed drainage mechanism or other system of water</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

**Modification number**    **Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))**    **Potential HRA Implications**

	<p><b>management.</b> Applicants should also demonstrate that they have taken <b>into account</b> <del>regard to</del> relevant recommendations of the Guildford Surface Water Management Plan or Ash Surface Water Study.'</p>										
<p>Monitoring Indicators (box)</p>	<p>Changes made to table in Monitoring Indicators box:</p> <table border="1"> <thead> <tr> <th data-bbox="403 571 766 651">Indicator</th> <th data-bbox="766 571 1070 651">Target</th> <th data-bbox="1070 571 1370 651">Data source</th> </tr> </thead> <tbody> <tr> <td data-bbox="403 651 766 1008"> <p>Number of <b>planning decisions, including appeals, granting permission not in accordance with Policy P4</b> <del>applications permitted for highly vulnerable uses in flood risk zone three.</del></p> </td> <td data-bbox="766 651 1070 1008"> <p>No planning <b>permissions that are not in accordance with Policy P4</b> <del>in flood zone 3b or 3a for highly vulnerable uses.</del></p> </td> <td data-bbox="1070 651 1370 1008"> <p>Planning applications <del>permissions and appeals.</del></p> <p>Planning <del>appeals</del></p> </td> </tr> <tr> <td data-bbox="403 1008 766 1168"> <p>Percentage of appeals <del>allowed for applications refused on flood risk grounds.</del></p> </td> <td data-bbox="766 1008 1070 1168"> <p>Reduction in <del>percentage of appeals allowed.</del></p> </td> <td data-bbox="1070 1008 1370 1168"></td> </tr> </tbody> </table>	Indicator	Target	Data source	<p>Number of <b>planning decisions, including appeals, granting permission not in accordance with Policy P4</b> <del>applications permitted for highly vulnerable uses in flood risk zone three.</del></p>	<p>No planning <b>permissions that are not in accordance with Policy P4</b> <del>in flood zone 3b or 3a for highly vulnerable uses.</del></p>	<p>Planning applications <del>permissions and appeals.</del></p> <p>Planning <del>appeals</del></p>	<p>Percentage of appeals <del>allowed for applications refused on flood risk grounds.</del></p>	<p>Reduction in <del>percentage of appeals allowed.</del></p>		<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
Indicator	Target	Data source									
<p>Number of <b>planning decisions, including appeals, granting permission not in accordance with Policy P4</b> <del>applications permitted for highly vulnerable uses in flood risk zone three.</del></p>	<p>No planning <b>permissions that are not in accordance with Policy P4</b> <del>in flood zone 3b or 3a for highly vulnerable uses.</del></p>	<p>Planning applications <del>permissions and appeals.</del></p> <p>Planning <del>appeals</del></p>									
<p>Percentage of appeals <del>allowed for applications refused on flood risk grounds.</del></p>	<p>Reduction in <del>percentage of appeals allowed.</del></p>										
<p>Policy 5 Themes Basin</p>	<p>Minor changes made to policy: '(1) Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the</p>	<p>No HRA implications. This modification does not provide for any new or</p>									

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
Heaths Special Protected Area	<p>Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development. Where one or more adverse effects on the integrity of the SPA will arise, measures to avoid and mitigate these effects must be delivered and secured in perpetuity. These <b>measures are unlikely to be acceptable unless</b> <del>must be</del> agreed with Natural England <b>in accordance with South East Plan policy NRM6.</b></p> <p>(4) 'Where further evidence demonstrates that the integrity of the SPA can be protected using different distance thresholds or with alternative measures (including standards of SANG provision different to those set out in this policy), <b>the Council will agree</b> these <del>must be agreed</del> <b>in consultation</b> with Natural England.'</p>	<p>elevated potential impact pathways linking policy to European sites.</p>
4.3.50c Definitions	<p>Additional sentences added to end of paragraph: "Adverse effects on integrity' refers to the definition under the Habitats Regulations. In line with the Habitats Regulations, development proposals should be screened to establish whether they are likely to have significant effects on the SPA. All net new residential development up to five km from the SPA, and developments of over 50 net new residential units five to seven km from the SPA are considered likely to have a significant effect. <del>Where significant effects are likely,</del> <b>and</b> proposals must undergo Appropriate Assessment to identify measures that avoid, as a first step, and mitigate any adverse effects. <del>However,</del> <b>if these</b> residential developments provide or contribute to appropriate SANG and SAMM <b>measures in accordance with the Thames Basin Heaths Special</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p><b>Protection Area Avoidance Strategy (the strategy), they will not be required to undergo Appropriate Assessment it is likely that it can be concluded that no adverse effects on the integrity of the SPA will occur as a result of increased recreational pressure.'</b></p>	
4.3.54 Zone of influence	Minor changes made: rewording of sentences to reflect the council's desire to protect the Themes Basin Heaths SPA.	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.3.56 New dwellings that do not require planning permission	Minor changes made: reformatting and rewording of sentences to reflect the council's desire to protect the Themes Basin Heaths SPA.	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.3.60	Minor changes made: reformatting and rewording of sentences.	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.3.62	Minor changes made: reformatting and rewording of sentences.	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
4.4.1 Economy polices	Additional sentences added to the end of paragraph: 'The NPPF states that one of the roles of the planning system is to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, <del>and innovation</del> <b>and improved productivity</b> . It goes on to say local planning authorities should <del>plan positively and proactively to meet the development needs of business and support an economy fit for the 21st century</del> <b>help create the conditions in which businesses can invest, expand and adapt.</b> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.4.2	Minor changes made: updating the dates of Corporate Plan ' <del>20152018-</del> <b>20202023</b> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.4.5a Retail needs	Additional paragraph: ' <b>Guildford town centre is a highly successful destination for shopping, which ranked 11 in the top 500 British retail centres for vitality in 2014 and second among the top five centres in the South East. It scored 29 in the Javelin VenueScore centre 2016 rankings, an improvement from 32 in 2014. 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.</b> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.4.5b	Additional paragraph: ' <b>Nevertheless, centres are constantly changing. As nearby similar sized centres such as Kingston upon</b>	No HRA implications. This modification does not provide for any new or

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p><b>Thames and Woking improve, so must Guildford town centre. As well as providing for shopping and employment needs, we must also improve the overall experience for visitors. Improvements may include 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.'</b></p>	<p>elevated potential impact pathways linking policy to European sites.</p>
4.4.5c	<p>Additional paragraph: <b>'We will work with our partners to deliver the Local Plan, and to progress further opportunities highlighted in the Guildford Town Centre Regeneration Strategy. Partners include Experience Guildford (Guildford's Business Improvement District), major land- owners including the North Street Regeneration site, Surrey Country Council as local highway authority, the Environment Agency, and the National Trust as owner of the River Wey.'</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.4.5d	<p>Additional paragraph: <b>'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. Policies E7-E9 deal with proposals for new retail and leisure developments and with proposals involving a loss of existing retail (A1) and other A-class uses from primary and secondary shopping frontages and district and local centres. As the most accessible location in the borough, Guildford town centre is the most suitable location for larger, mixed-use developments including retail and housing. Large-scale</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications						
	<p>retail schemes will be located, wherever possible, within the Primary Shopping Area (PSA). The boundary of Guildford town centre, its PSA and ground floor primary and secondary shopping frontages are illustrated on the Policies Map (Appendix F). The shopping frontages are also listed in Appendix B.'</p>							
4.4.5e	<p>Additional sentence: <b>'The borough-wide targets for retail and employment needs are set out in Policy E1 below:'</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>						
Policy E1 Meeting employment and retail needs	<p>Amendments to entire policy: '(1) In order to deliver 4,100 additional B class jobs<sup>2</sup> to 2034, land <del>has been</del><b>will be</b> allocated for a net gain of between 36,100 and 43,700 sq m of floorspace for office and research &amp; development (B1a and B1b) and between 3.7 and 4.1 ha land for industrial (B1c, B2 and B8) uses. This will provide a range and choice of employment premises over the plan period and accommodate the predicted future growth in jobs required for the borough's economy to develop and strengthen.'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>						
	<table border="1"> <thead> <tr> <th data-bbox="792 1042 1032 1114"></th> <th data-bbox="792 1114 1032 1161">Lower range</th> <th data-bbox="792 1161 1032 1273">Upper range</th> </tr> </thead> <tbody> <tr> <td data-bbox="412 1042 781 1273">Office and Research &amp; Development floorspace (B1a and B1b)</td> <td data-bbox="792 1114 1032 1161">36,100 sq m</td> <td data-bbox="792 1161 1032 1273">43,700 sq m</td> </tr> </tbody> </table>		Lower range	Upper range	Office and Research & Development floorspace (B1a and B1b)	36,100 sq m	43,700 sq m	
	Lower range	Upper range						
Office and Research & Development floorspace (B1a and B1b)	36,100 sq m	43,700 sq m						

**Modification number**      **Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))**      **Potential HRA Implications**

Industrial land (B1c, B2 and B8)	3.7 ha	4.1 ha
----------------------------------	--------	--------

(1a) To meet the borough-wide need for retail and leisure uses, land has been allocated for an approximate net gain of floorspace as indicated in the table below:

	Net capacity to 2030 (sq m)	Assumed gross capacity (sq m)
Comparison goods retail (A1) uses	28,202	40,289
Convenience goods retail (A1) uses <sup>3</sup>	1,869 – 3,523	2,670 – 5,033
Food and beverage (A3/A4/A5) uses	4,230 – 5,641	6,043 - 8,058

4.4.14  
Introduction

Minor changes made by reformatting of beginning sentence: 'The NPPF states planning policies should ~~promote competitive town centre environments and set out policies for the management and growth of centres over the plan period~~ **support the role that town centres play at**

No HRA implications.  
This modification does not provide for any new or elevated potential impact pathways linking policy to

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
Policy 2 E2 Location for new employment floorspace	<p><b>the heart of local communities, by taking a positive approach to their growth, management and adaptation.'</b></p> <p>Amendments to entire policy: <b>'(0a) The Plan aims to ensure sustainable employment development patterns, promote smart growth (see glossary) and business competitiveness, and allow flexibility to cater for the changing needs of the economy.</b></p> <p><b>(0b) The following will be supported:</b></p> <ul style="list-style-type: none"> <li><b>(a) the retention, creation and development of small local business by encouraging a range of types and sizes of new premises including incubator units, managed workspace and serviced office accommodation</b></li> <li><b>(b) the provision of essential ancillary employment facilities close to places of employment</b></li> <li><b>(c) rural economic development opportunities</b></li> <li><b>(d) proposals which come forward to redevelop outmoded employment floor space and cater for modern business needs and</b></li> </ul> <p><b>Office and Research Development:</b></p> <p><b>(1) Proposals for new office and research &amp; development (B1a and B1b) floorspace will be directed sequentially to: Guildford town centre, and Offices and Research &amp; Development Strategic Employment Sites1. Only if sites cannot be found should edge of</b></p>	<p>European sites.</p> <p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

**Modification number**      **Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))**      **Potential HRA Implications**

**centre sites and locations within 500m of a public transport interchange be considered.**

(a) ~~\_\_\_\_\_ Guildford town centre, then~~

(b) ~~\_\_\_\_\_ locations within 500m of a public transport interchange, then~~

(c) ~~\_\_\_\_\_ Offices and Research & Development Strategic Employment Sites<sup>1</sup> unless:~~

(i) ~~\_\_\_\_\_ the proposed floorspace is limited in scale (less than 200 sq m or 25% of the existing office/R&D floorspace whichever is the lower) and/or~~

(ii) ~~\_\_\_\_\_ ancillary to the primary use of the site.~~

(2)            The sequential approach does not apply to proposed floorspace included in the site allocations in the Local Plan.

**(3)            Outside the town centre and Strategic Employment Sites** ~~Where net additional floorspace exceeding 200 sq m or 25% of the, existing office and R&D floorspace~~ **may be expanded by up to 25% of the planning application site boundary on a site-by-site basis.** ~~is proposed (whichever is the lower) in the redevelopment or extension of a building in locations other than those set out above,~~ **In considering proposals larger than this, the Council** ~~it will have regard to~~ **need to be demonstrated that there are:**

(a)            **the operational needs of business for on-site expansion,** ~~no sites available in the locations set out above~~

(b)            **whether suitable sites are available in the town centre**

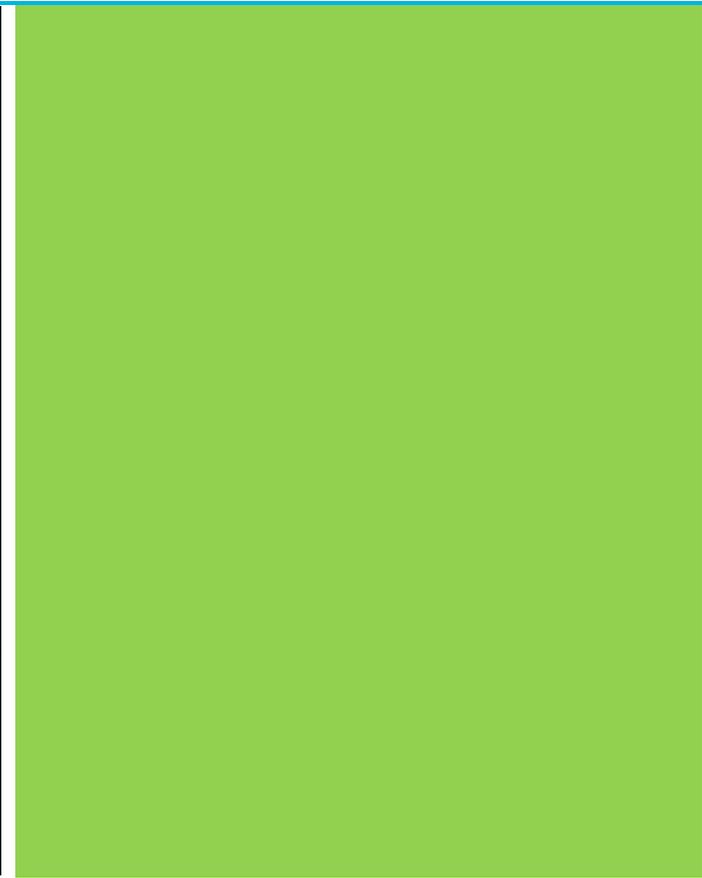


Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p><b>and the Strategic Employment Sites</b><del>there is a demonstrated need, and</del></p> <p>(c) <b>whether</b> the site is <b>accessible</b>, or <del>can</del><b>will</b> be made accessible, by sustainable modes of transport.</p> <p><b>(4) The expansion of existing offices in locations outside the town centre, Strategic Employment Sites and Locally Significant Employment Sites should be limited and any development not limited in scale is to be directed to sequentially preferable locations.</b></p> <p>Industrial, warehousing and storage:</p> <p>(5) Proposals for new industrial, warehousing and storage (B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites and any sites where this use class of floorspace is included in the site allocation in the Local Plan.</p> <p>All B class development:</p> <p>(6) Proposals for the provision for small business units (less than 50 sq m), suitable for start-ups and SME will be encouraged.</p> <p>(7) Proposals, particularly those of over 5,000 sq m, will be encouraged to provide childcare facilities on or close to the site.'</p>	
4.4.21a	Additional paragraph: <b>'To avoid doubt the 25% applies to the existing</b>	No HRA implications.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications						
Definitions	<b>floorspace that is within the red line of the planning application. This could comprise an individual building or a number of commercial units.'</b>	This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.						
4.4.23 Definitions	Reformatting of paragraph: <b>'The need to renew and refurbish employment floorspace, especially office space, is imperative.</b> To ensure the supply of premises is suitable for modern business needs, <del>renewal including redevelopment of existing offices is encouraged.</del> <b>and</b> the borough is <b>able</b> to retain existing occupiers and compete effectively for new occupiers looking to locate in the area. There is currently need for grade A and good quality grade B premises. <del>There is a particular need for grade A (the best office space) and good quality second-hand floorspace.</del> This will be particularly encouraged in the most sustainable locations in terms of public transport accessibility.'	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.						
Monitoring Indicators (box)	Amendments to table: <table border="1" data-bbox="414 933 1355 1244"> <thead> <tr> <th data-bbox="414 933 728 1005">Indicator</th> <th data-bbox="728 933 1041 1005">Target</th> <th data-bbox="1041 933 1355 1005">Data source</th> </tr> </thead> <tbody> <tr> <td data-bbox="414 1005 728 1244">           Percentage of permitted and completed class B1a and B1b floorspace that is located:           <ul style="list-style-type: none"> <li>in Guildford town</li> </ul> </td> <td data-bbox="728 1005 1041 1244">95%</td> <td data-bbox="1041 1005 1355 1244">           Planning applications and appeals and building completions data         </td> </tr> </tbody> </table>	Indicator	Target	Data source	Percentage of permitted and completed class B1a and B1b floorspace that is located: <ul style="list-style-type: none"> <li>in Guildford town</li> </ul>	95%	Planning applications and appeals and building completions data	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Indicator	Target	Data source						
Percentage of permitted and completed class B1a and B1b floorspace that is located: <ul style="list-style-type: none"> <li>in Guildford town</li> </ul>	95%	Planning applications and appeals and building completions data						

**Modification number**    **Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))**    **Potential HRA Implications**

<p>centre</p> <ul style="list-style-type: none"> <li>• <del>locations</del> within 500m of a public transport interchange</li> <li>• on the Strategic Employment Sites</li> </ul>		
<p>Percentage of permitted and completed class B1c, B2 and B8 floorspace that is located on the Industrial Strategic Employment Sites</p>	<p><del>100%</del> <b>95%</b> of permitted and completed class B1c, B2 and B8 floorspace on the Industrial Strategic Employment Sites, <b>and sites where these use classes are included in site allocations within the Local Plan.</b></p>	<p>Planning applications and appeals and building completions data</p>
<p>Percentage of B class development proposals incorporating units of less than 50 sq m</p>	<p>50%</p>	<p>Planning applications and appeals and building completions data</p>



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))			Potential HRA Implications
	Percentage of B class development proposals over 5,000 sq m incorporating childcare facilities on or close to the site	50% of developments over 5,000 sq m	Planning applications and appeals and building completions data	
4.4.25a introduction	<p>Additional paragraph: <b>‘Sufficient land has not been identified within the urban area to meet the employment land requirements so it has been necessary to allocate new employment sites. There needs to be a degree of choice and flexibility of floor space to ensure that the local property market can operate efficiently and allow businesses in the borough to grow. If enough suitable land, choice and flexibility are not provided, the Local Plan may not meet the needs of the borough’s businesses. In time, this could lead to existing businesses moving out of the borough and new and small businesses not being able to establish themselves or invest in the borough. The retention of existing and the creation of new incubator and move-on units is key to supporting new businesses in the borough and helping existing small businesses to thrive. A priority in our economic strategy is to increase the amount of incubator and start-up space for new and emerging SMEs.’</b></p>			<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
Policy E3 Maintaining	<p>Minor changes made to policy: removal of <del>‘Guildford Town Centre employment core’</del> from the office and research and development</p>			<p>No HRA implications. This modification does not provide for any new or</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
employment capacity and improving employment floorspace	<p>strategic employment sites.</p> <p>Reformatting of paragraph: '<del>(3)(4)</del><b>On Strategic and Locally Significant Employment Sites</b>, Once the period of the comprehensive and active marketing <b>should also include consideration of</b> <del>is complete, another alternative</del> suitable B class employment use <del>should be considered, followed by any</del> and other employment generating use, before change of use to residential or other use with no on-going employment use will be permitted.'</p> <p>Reformatting of paragraph: '<del>(4)(3)</del>Outside of the designated employment sites, employment floorspace will be protected in line with the latest needs assessment and the loss will be resisted unless the site is allocated for an alternative use within the Local Plan. Redevelopment or change of use <del>to a non-employment use will only be acceptable</del> <b>housing use will be acceptable</b> if evidence is provided of active and comprehensive marketing of the site for its current use for a continuous period of at least 12 months prior to submission of a planning application. <b>If the site is allocated for an alternative use within the Local Plan, the marketing period will not be required.</b>'</p> <p>Additional paragraph: '<del>(6)</del> <b>Redevelopment or change of use to a non-employment use will only be acceptable where the land or premises are unsuitably located in terms of its impact on the environment,</b></p>	<p>elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p>levels of traffic movement, its accessibility to public transport and its link with the infrastructure, and its impact on the amenity of the area or adjoining occupiers.'</p> <p>Additional paragraph: '(7) <b>The provision of ancillary uses on a Strategic or Locally Significant Employment Site that complement and positively enhance the functioning of the employment area will be supported.</b>'</p>	
4.4.29 Definitions	<p>Amendments to paragraph: '<del>The Strategic Employment Sites and Locally Significant Employment Sites were identified in the ELNA. are identified in policy E1 and on the Policies Map.</del> <b>The sites are all larger than 1.5 ha and all have at least 7,000 sq m of employment floorspace, most have more than 10,000 sq m of floorspace. Together the sites make up more than 170 ha of employment land and more than 500,000 sq m of employment floorspace.</b>'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.4.29 Definitions	<p>Additional paragraph: '<b>The identified Locally Significant Employment Sites listed in the above policy are shown on the Proposals Map however the list is not exhaustive. All sites which meet the definition will be classified as Locally Significant Employment Sites. The sites were identified from the non-strategic sites in the ELNA and local knowledge. They are single buildings of approximately 3,000 sq m or greater, clusters of two or more buildings in the urban area or rural clusters, which are important to retain to support the rural economy.</b>'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
4.4.31 Reasoned justified	<p>Amendments to paragraph: ‘Policy E3 seeks to sustain and enhance employment in the borough through the protection of sites as set out in the policy. It aims to protect employment floorspace to ensure there is sufficient supply to accommodate existing and future need. <del>As set out above, the new Local Plan seeks to protect existing major employment sites and protect its locally strategic employment sites to comply with the NPPF.</del> <b>Loss of these sites to alternative uses runs the risk of constraining employment growth and limiting economic diversification.</b> As set out in the policy a more flexible approach will be applied to the change of use in locations outside town centres and key existing employment locations, however as a significant number of sites are being lost through permitted development, the policy seeks to ensure existing and future need is accommodated.’</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.4.31a Reasoned justified	<p>Additional paragraph: ‘<b>The provision of ancillary uses as referred to in Policy E3(7) within employment areas can serve to enhance the function and attraction of these sites to businesses and their employees and reduce the need for staff to travel to alternative facilities away from the workplace. Such uses may be provided on site either as new buildings, by means of expansion of an existing B1, B2 or B8 use or as redevelopment of part of an existing B1, B2 or B8 use. Examples of ancillary uses considered appropriate on a Strategic or Locally Significant Employment site that would be supported include small local shops, gymnasia, creches and canteens.</b>’</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
4.4.32a	Additional paragraph: <b>‘Three of the Strategic Employment Sites (The Pirbright Institute, Lysons Avenue, Ash Vale and Henley Business Park, Normandy) have been identified as having land which falls within 400m of the SPA. Two of the Public Transport Interchanges (Ash and Ash Vale stations) have been identified as having land which falls within 400m of the SPA. Development on these sites which falls within the 400m exclusion zone (as defined in Policy P5) will require a project-level HRA.’</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites. It is a positive modification emphasising the need for a project-level HRA as previously prescribed in Policy P5 Thames Basin Heaths.
4.4.33	Removal of sentence: <del>‘The policy will be implemented via the development management process.’</del>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.4.34	Amendments to paragraph: <del>‘The NPPF requires planning authorities to plan proactively to meet the development needs of business and support an economy fit for the 21st century</del> <b>states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It goes on to say that the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. Paragraph 2182 requires the Council to “support existing business sectors” and to “plan positively for the location, promotion and expansion of make provision for clusters or networks of knowledge and data-driven, creative or high technology industries”.</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
Policy E4 Surrey Research Park	Amendments to paragraph: ‘ (1) The existing 28 hectare Surrey Research Park shown on the Policies Map and the proposed extension described in policy A26, will be protected for business use comprising offices, research, development, design and innovation activities, <del>in any science, including social science,</del> falling within Use Classes B1 (a), (b) and (c) of the Town and Country Planning (use Classes) Order 1987 (as amended), <del>that is complementary to the activities of the University of Surrey. Development in accordance with the above will be supported.</del> <b>Development for general office use B1(A) that does not contribute to the specific function of the Research Park will not be supported.</b> ’	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.4.43 Introduction	Amendments to paragraph: ‘The NPPF states that planning policies should support <del>economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development, which includes economic, social and environmental dimensions</del> <b>a prosperous rural economy that enables the sustainable growth and expansion of all types of business in rural areas.</b> ’	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Policy E5 Rural economy	Minor changes made: reformatting and rewording of two sentences to reflect the council’s aim of economic growth in a sustainable manor.	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Key Evidence (box)	Minor changes made: updating dates of Guilford Borough Corporate Plan reference.	No HRA implications. This modification does not provide for any new or

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p>Deletion of reference: 'Surrey Rural Strategy 2010—2015, (Surrey Rural Partnership, 2010)'</p> <p>Addition of reference: '<b>A Rural Statement for Surrey (Surrey Countryside and Rural Enterprise Forum, 2016)</b>'</p>	<p>elevated potential impact pathways linking policy to European sites.</p>
<p>Policy E6 The leisure and visitor experience</p>	<p>Minor changes: reformatting and rewording of several sentences to reflect the council's aims of 'high quality visitor experience' through tourism, art, cultural heritage and sport.</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p>4.4.69 Policy E7: Retail and leisure uses in Guildford Town Centre</p>	<p>Deletion of paragraph: '<b>Guildford town centre is lively and economically resilient. It has proved to be one of the most resilient centres in the country in times of economic downturn<sup>2</sup>, primarily due to its largely affluent catchment population and attractive environment.</b>'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p>4.474</p>	<p>Deletion of paragraph: '<del>The role of Guildford town centre as the key retail and service centre for Surrey county will be reinforced, and it will become a more attractive place to live, to visit and to work in. We will ensure the public realm is enhanced and insist that all new development will be of the highest design and environmental standards. We will also take opportunities to reconnect the town centre to the amenity of the riverside.</del>'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
<p>Policy E7 Retail and leisure uses in Guildford Town Centre</p>	<p>Amendments to entire policy: <del>(1) By 2034, Guildford town centre will have:</del></p> <p><del>(a) a new retail-led, mixed-use development of 41,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site within its primary shopping area.</del></p> <p><del>(b) developments of other town centre uses that contribute to the liveliness of the town centre including food and drink, more gyms and cinema screens;</del></p> <p><del>(c) approximately 1,300 new homes, particularly on upper floors as part of mixed use developments.;</del></p> <p><b>Proposals for new retail and main town centre leisure uses</b></p> <p><b>(1) In order to strengthen the liveliness and economic resilience of Guildford town centre, new retail and leisure uses located within the centre will be supported. Where no suitable sites are available within the centre, sites on the edge of the centre will be considered.</b></p> <p>(2) Retail and leisure proposals over 500 sq m (gross) located outside of Guildford town centre, local or district centres, and where the site is not allocated in this Plan, must be supported by a retail impact assessment.</p> <p><b>Proposals for loss of A1 retail and other Class A uses</b></p> <p>(3) Within the Primary Shopping Frontage as defined on the</p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
---------------------	---	----------------------------

Policies Map proposals for change of use of existing ground floor shops (Class A1) to other uses will not be permitted.

(4) Within the Secondary Shopping Frontage defined on the Policies Map, planning permission for the change of use of ground floor shops (Class A1) to Class ~~A2~~, A3, A4 or A5 will be permitted where all the following criteria are met:

- (a) the additional uses result in no more than two permitted ground floor non- retail uses adjacent to each other; and
- (b) the additional use results in no more than one third of this section of the defined street level frontage (as defined in Appendix B) in permitted non-A1 Use Class; and
- (c) the use will not result in loss of amenity in terms of noise, disturbance, smell, litter or traffic generation; and
- (d) the proposed use will not be detrimental to the shopping function or character of the town centre.

(5) **Within the Primary Shopping Area, E**exceptionally the loss of shopping area uses (Class A) at ground floor level will be permitted, subject to the above criteria, where the proposed use is appropriate to a town centre shopping frontage.

~~(6) ——— Proposals for new food takeaways within 500m of schools~~



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications									
	<del>will not be accepted because of the potential negative impact on the health of school children.</del>										
4.4.84	Deletion of paragraph: <del>‘Consumer habits are changing and to be a successful town centre in the future will involve strengthening the retail offer and diversifying to include other town centre uses. The town centre will become more important as a focus for our leisure time, and the enhancement of the riverside, buildings and public spaces between them will contribute to this diversification.’</del>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.									
4.4.85	Minor changes made to policy: rewording and reformatting of paragraph to reflect the council’s wishes that any retail development outside the town centre is subject to impact assessment.	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.									
Monitoring Indicators (box)	Changes to table: <table border="1" data-bbox="412 922 1361 1278"> <thead> <tr> <th data-bbox="412 922 824 995">Indicator</th> <th data-bbox="824 922 954 995">Target</th> <th data-bbox="954 922 1361 995">Data source</th> </tr> </thead> <tbody> <tr> <td data-bbox="412 995 824 1171"><b>Number of ground floor retail (A1) uses lost to other use classes within the Primary Shopping Frontage</b></td> <td data-bbox="824 995 954 1171"><b>N/a</b></td> <td data-bbox="954 995 1361 1171"><b>Town centre retail surveys</b></td> </tr> <tr> <td data-bbox="412 1171 824 1278"><b>Number of applications approved in the Secondary</b></td> <td data-bbox="824 1171 954 1278"><b>0</b></td> <td data-bbox="954 1171 1361 1278"><b>Town centre retail surveys and planning applications</b></td> </tr> </tbody> </table>	Indicator	Target	Data source	<b>Number of ground floor retail (A1) uses lost to other use classes within the Primary Shopping Frontage</b>	<b>N/a</b>	<b>Town centre retail surveys</b>	<b>Number of applications approved in the Secondary</b>	<b>0</b>	<b>Town centre retail surveys and planning applications</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Indicator	Target	Data source									
<b>Number of ground floor retail (A1) uses lost to other use classes within the Primary Shopping Frontage</b>	<b>N/a</b>	<b>Town centre retail surveys</b>									
<b>Number of applications approved in the Secondary</b>	<b>0</b>	<b>Town centre retail surveys and planning applications</b>									

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p><b>Shopping Frontage that would result in more than two permitted ground floor non-retail uses (A1) adjacent to each other or more than one third of the defined street level frontage (as defined in Appendix B) in permitted non-A1 use.</b></p>	
Policy E8 District Centres	<p>Minor changes made to policy: reformatting and rewording of sentences.</p> <p>Deletion of sentence: '(5) <del>Proposals for new hot food takeaways (Use Class A5) within 500m of schools will not be accepted because of the potential negative impact on the health of school children.</del></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.4.87e	<p>Addition of paragraph: '<b>District Centres comprise at least 30 non-residential units, including a supermarket and local services such as a bank, and public and community facilities such as a meeting hall, etc.</b>'</p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.4.89 Reasoned justification	<p>Addition of sentence at the end of paragraph: '<del>National planning policy</del> <b>The NPPF</b> sets out two tests that must be applied when considering developments of <b>certain</b> main town centre uses that are not in a centre</p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications						
	<p>and that are not allocated in this Local Plan. These are the sequential test and the <b>retail</b> impact test. <b>In considering proposed developments of any main town centre use on sites outside of designated centres on sites that are not allocated for such uses, the sequential test must be applied. Retail and leisure proposals over 500 sq m on unallocated land outside of designated centres must be accompanied by an impact assessment. This will help to preserve the liveliness of our centres, and to protect them from significant adverse impacts from new retail and leisure developments in less suitable locations.</b></p>	<p>European sites.</p>						
Key Evidence (box)	<p>Deletion of reference: '<del>Guildford Retail and Leisure Study Update 2014 (Guildford Borough Council, 2015) and Addendum 2017</del>'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>						
Monitoring Indicators (box)	<p>Amendments to table:</p> <table border="1" data-bbox="414 965 1355 1244"> <thead> <tr> <th data-bbox="414 965 716 1045">Indicator</th> <th data-bbox="728 965 1041 1045">Target</th> <th data-bbox="1052 965 1355 1045">Data source</th> </tr> </thead> <tbody> <tr> <td data-bbox="414 1053 716 1244">Total amount of additional B class floorspace permitted and completed on the site</td> <td data-bbox="728 1053 1041 1244">Approx. 30,000 sq m B1a, b and c over the plan period that is complementary to the activities of the</td> <td data-bbox="1052 1053 1355 1244">Planning applications and appeals and building completions data</td> </tr> </tbody> </table>	Indicator	Target	Data source	Total amount of additional B class floorspace permitted and completed on the site	Approx. 30,000 sq m B1a, b and c over the plan period that is complementary to the activities of the	Planning applications and appeals and building completions data	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
Indicator	Target	Data source						
Total amount of additional B class floorspace permitted and completed on the site	Approx. 30,000 sq m B1a, b and c over the plan period that is complementary to the activities of the	Planning applications and appeals and building completions data						

**Modification number**    **Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))**    **Potential HRA Implications**

		University of Surrey		
	Total amount of appropriate additional B class floorspace permitted and completed on the site, comprising of offices, research, development, design and innovation activities which is complementary to the activities of the University of Surrey	Approx. 30,000 sq m B1a, b and c over the plan period <del>that is complementary to the activities of the University of Surrey</del> (100% of development)	Planning applications and appeals and building completions data	
4.5.2	<p>Amendments to paragraph: 'The NPPF <b>states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.</b> <del>attaches great importance to the design of the built environment and states that good design should contribute positively to</del></p>			<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p><del>making places better for people.</del> Urban design and architecture can contribute to health outcomes through encouragement of more active lifestyles. Development should be encouraged to create places that create mixed communities catering for the needs of different types of people, including the young and old, encourage walking and cycling, improve access to public transport, and ensure that new development connects with existing parks and open spaces for recreation. Building exteriors and public realm should be designed in a way that contributes to pedestrian friendly environments.'</p>	
4.5.3	<p>Minor changes: reformatting and rewording of sentences to reflect the council's need to accommodate growth over the plan period.</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.5.4	<p>Addition of sentence: 'It will be important to ensure that new housing and employment areas are designed to respect the existing character of the borough, and create great places for people to live in or use. <b>The development of the strategic sites offers the opportunity of creating their own identity and character.</b>'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
Policy D1 Place shaping	<p>Addition of entire policy: <b>'(1) All new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set. Essential elements of place making include creating economically and socially successful new</b></p>	<p>No HRA implications. This modification provides a new policy relating to place shaping. This policy does not provide for any location type or quantum of development, but provides development principles.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p>places with a clear identity that promote healthy living; they should be easy to navigate, provide natural security through layout and design with attractive, well enclosed, and overlooked streets, roads and spaces with clear thought given to the interrelationship of land use to external space.</p> <p>(2) All new development is expected to have regard to and perform positively against the recommendations set out in the latest Building for Life guidance and conform to the nationally described space standards as set out by the Department of Housing, Communities and Local Government (DCLG).</p> <p>(3) New development shall be of a high quality and inclusive design, as per the Design Guide Supplementary Planning Document (SPD), and all new development will be required to address the following;  <b>Distinct local character</b></p> <p>(4) All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development, including landscape setting. Proposals will take account of local design guidance contained within conservation area appraisals, DPD's, neighbourhood plans and SPDs.</p> <p>(5) Given the size, function and proposed density of the</p>	<p>There are no linking impact pathways present.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
---------------------	--	----------------------------

**strategic allocations it may not always be desirable to reflect locally distinct patterns of development. These sites must create their own identity to ensure cohesive and vibrant neighbourhoods.**

**Safe, connected and efficient streets**

**(6) All new development will be designed to ensure it connects appropriately to existing street patterns and creates safe and accessible spaces. Particular regard shall be given to maximise opportunities for pedestrian and cycle movement and the creation of a high quality public realm.**

**Network of green spaces and public places**

**(7) All new development will be designed to maximise the opportunity for and linkages between green spaces and public places, and include high quality landscaping that reflects the local distinctive character.**

**Crime prevention and security measures**

**(8) All new development will be designed to reduce opportunities for crime and antisocial behaviour.**

**Access and inclusion**

**(9) All new development will be designed to meet the needs of all users, this includes the setting of the building in the wider environment, the location of the building on the plot, the gradient of the plot, transport infrastructure and public realm.**

**Efficient use of natural resources**

**(10) All new development will be designed with regard to**



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
---------------------	--	----------------------------

	<p>efficient use of natural resources including passive solar gain to maximise the use of the sun’s energy for heating and cooling.</p> <p>Infrastructure to create smart places</p> <p>(11) All new development will be designed in a manner that:</p> <p>(a) supports technological and digital advances, including the provision of sufficient ducting space for future digital connectivity infrastructure;</p> <p>(b) seeks to achieve high quality digital connectivity, enabling Fibre To The Premise (FTTP) where practical;</p> <p>(c) enables mobile connectivity within the development;</p> <p>(d) provides access to services from a range of providers.</p> <p>(12) Further innovation and provision for 5G, Wifi and other technologies will be encouraged.</p> <p>Masterplans for strategic sites</p> <p>(13) Developers will be required to produce Masterplans for Slyfield Area Regeneration Project (A24), Gosden Hill Farm (A25), Blackwell Farm (A26) and the former Wisley airfield (A35) and these will be subject to assessment by a Design Review Panel. The masterplanning process shall engage with the local community.</p> <p>(14) In order to ensure future cohesive and vibrant neighbourhoods, they must demonstrate how the development responds to the immediate context as well as;</p> <p>(a) Creates functional places</p>	
--	--	--

**Modification number**      **Type of Change (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))**      **Potential HRA Implications**

- (b) Supports mixed use tenures**
- (c) Includes successful public spaces**
- (d) Is adaptive and resilient**
- (e) Has a distinctive character**
- (f) Is attractive**
- (g) Encourages ease of movement**
- (h) Creates a sustainable environment in relation to access to services and facilities**
- (15) Planning applications will be consistent with the Masterplans, which must be kept under review.**
- Use of Design Review Panel**
- (16) In addition to the strategic sites, the Council will expect other large schemes to be subject to assessment by a Design Review Panel.**
- Villages**
- (17) Proposals for new development within villages will have particular regard to;**
  - (a) The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape**
  - (b) Important views of the village from the surrounding landscape**
  - (c) Views within the village of local landmarks**



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p><b>Ash &amp; Tongham</b></p> <p><b>(18) In order to avoid piecemeal development and to protect and enhance the existing character of Ash &amp; Tongham and Ash Green, proposals within the area will have particular regard to;</b></p> <p><b>(a) The relationship and connectivity with the existing urban area</b></p> <p><b>(b) The relationship and connectivity between allocated sites in different ownerships</b></p> <p><b>(c) The existing character of Ash &amp; Tongham and Ash Green</b></p> <p><b>(d) The future urban edge and its relationship with the surrounding countryside at the allocated site's boundaries.</b></p>	
<p>4.57 Reasoned justification</p>	<p>Amendments to paragraph: 'It is important <del>at this strategic stage in the local planning process</del> that we set out how we will plan positively to achieve very high quality <del>and inclusive</del> design for all developments. <del>National planning policy</del> <b>The NPPF</b> requires the inclusion of a robust policy for design quality, <del>ultimately the NPPF gives local planning authorities the power to</del> <b>and states that permission should be</b> refused <b>for</b> development of poor design that fails to take opportunities available for improving the character and quality of an area and the way it functions. This policy forms the strategic element with more detailed policy to follow as we <b>prepare the Development Management Policies DPD</b> <del>form the development control policies.</del>'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
4.5.10	Deletion of end sentence: ‘Historically, development has been focused in the urban areas of Guildford and Ash and Tongham <del>only</del> . The Plan identifies a number of strategic sites for development and we will expect masterplans for these sites to be produced as part of the planning process. <del>Given the size, function and proposed density of the strategic allocations it may not always be possible to reflect locally distinct patterns of development. These sites must create their own identity to ensure cohesive and vibrant neighbourhoods.</del> ’	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.5.13	Addition of paragraph: ‘ <b>Our Corporate Plan (2018-2023) identifies regenerating and improving Guildford town centre and other urban areas as one of three strategic priorities supporting its “Place Making” theme. Development within Guildford Town Centre will need to have regard to a very particular set of circumstances and this policy should be read in conjunction with Policy S3: Delivery of development and urban regeneration within Guildford Town Centre.</b> ’	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.5.14	Addition of paragraph: ‘ <b>Innovation is a fundamental theme of the Council’s Corporate Plan and the creation of smart places infrastructure across Guildford is a priority. In this regard, the Plan identifies the need for potential future technological and digital advances to be taken into account in planning, regeneration and development decisions.</b> ’	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
4.5.15	Addition of paragraph: <b>‘The greater part of urban Guildford has good broadband and mobile phone signal connectivity. However, digital connectivity has been identified as a challenge by business, particularly in rural areas. Furthermore, because of the reliance on copper wire connections from street cabinets for many subscribers, download and upload speeds vary greatly.’</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.5.16	Addition of paragraph: <b>‘The Council considers it essential that new development is planned and designed to enable appropriate digital infrastructure and to be at the forefront of advances in broadband technology. Doing so will help ensure that Guildford borough remains a highly attractive location for businesses and residents alike and development supports delivery of the Government’s Industrial Strategy.’</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.5.17	Addition of paragraph: <b>‘A flexible, but ambitious approach is regarded as appropriate in achieving development that supports innovation and is responsive to the rapid rate of change in relation to digital technology. The provision of FTTP is viewed a desired default technology, however it is recognised that this may not be practical in all cases. Similarly, the Council’s aspiration is that connectivity speeds of at least 1Gbps offered by full (synchronous) FTTP could be achieved. FTTP and high quality connectivity will thus be encouraged in relation to new development, and particularly at development of major residential and employment sites.’</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications						
4.5.18	Addition of paragraph: <b>‘The Council will be working closely with external strategic partners like Superfast Surrey, and Network Rail to optimise fibre network interventions, including enabling the use of “dark” (unlit) fibre and to promote further innovations relating to improving digital connectivity.’</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.						
Key Evidence (box	Addition of references: <b>‘Secured by Design, Design Guides (Various years, available online at: <a href="http://www.securedbydesign.com/industry-advice-and-guides/">http://www.securedbydesign.com/industry-advice-and-guides/</a>) Rural Economic Strategy 2017-2022 (Guildford Borough Council, 2017) The Building Regulations 2010, Physical Infrastructure for high speed electronic communications networks, R1 In-building physical infrastructure (2016 edition)’</b>	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.						
Monitoring Indicators (box)	Amendments to table: <table border="1" data-bbox="412 948 1335 1228"> <thead> <tr> <th data-bbox="412 948 719 1018">Indicator</th> <th data-bbox="719 948 1025 1018">Target</th> <th data-bbox="1025 948 1335 1018">Data source</th> </tr> </thead> <tbody> <tr> <td data-bbox="412 1018 719 1228">Number of new developments achieving the “Built for Life” quality mark</td> <td data-bbox="719 1018 1025 1228">Increase number of developments that have achieved the Built for Life quality mark</td> <td data-bbox="1025 1018 1335 1228">Planning permissions and appeals</td> </tr> </tbody> </table>	Indicator	Target	Data source	Number of new developments achieving the “Built for Life” quality mark	Increase number of developments that have achieved the Built for Life quality mark	Planning permissions and appeals	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Indicator	Target	Data source						
Number of new developments achieving the “Built for Life” quality mark	Increase number of developments that have achieved the Built for Life quality mark	Planning permissions and appeals						

**Modification number**      **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))      **Potential HRA Implications**

	<p><b>Number of planning decisions, including appeals, granting permission which have been subject to assessment by a Design Review Panel</b></p>	<p>N/A</p>	<p><b>Planning permissions and appeals</b></p>	
	<p>Percentage of appeals allowed for applications originally refused for design reasons</p>	<p>Reduction in the percentage of appeals allowed that are considered to be poorly designed</p>	<p>Planning appeals</p>	
<p>4.5.9 Sustainable development</p>	<p>Amendments to paragraph: <del>The NPPF states that</del> <b>Achieving sustainable development means that plans should secure net gains achieving growth while “ensuring that better lives for ourselves don’t mean worse lives for future generations” within economic, social and environmental objectives (NPPF, paragraph 8). Environmental objectives include using natural resources prudently, minimising waste, mitigating and adapting to climate change and moving to a low carbon economy.</b> <del>In environmental terms, this means taking into account the impact of our consumption patterns on the environment’s</del></p>			<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p><del>ability to provide both for ourselves and for future generations, and living within the environmental limits of one planet.</del></p> <p><del>In practice, this means being careful about how much we consume, reusing materials and favouring renewable resources over finite resources.'</del></p>	
4.5.10 Sustainable development	<p>Deletion of paragraph: 'The NPPF sets out the government's vision of sustainable development, and highlights the key themes that should be addressed including:</p> <p><del>water supply and demand (paragraphs 94 and 99)</del></p> <p><del>minimisation of waste and pollution (paragraphs 7, 17, 109, 110, 143 and 156)</del></p> <p><del>promotion of renewable, low carbon and decentralised energy (paragraphs 93 and 97)</del></p> <p><del>the prudent use of natural resources (paragraph 7)</del></p> <p><del>radical reduction of greenhouse gas emissions and (paragraph 93), and management of the risks of climate change through suitable adaptation measures in new developments (paragraphs 14, 94, 99 and 156).'</del></p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.5.11 Climate change and the low carbon economy	<p>Amendments to paragraph: 'The NPPF identifies climate change as a key challenge for the planning system to address and requires it to assist in the movement towards a low carbon economy. The South East of England is likely to face significant challenges from a changing climate and changing weather patterns. To avoid the costs associated with retrofitting and replacement, new buildings should be future proofed;</p>	<p>No HRA implications.</p> <p>This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	suited to, and easily adaptable for, the range of climate conditions and weather patterns we are likely to see over the next century, and adaptable to new technologies. The buildings we build today are likely to be with us into the next century, so the benefits of building adaptable and energy and resource efficient developments will last a long time.'	
4.5.15	Amendments to paragraph: 'Early engagement between developers and the Council to help achieve the greatest sustainability benefit is encouraged. <del>Applicants for planning permission should submit statements that set out how the requirements set out in policy D2 will be met.</del> The Council will support this work by signposting relevant advice and providing guidance through the Sustainable Design and Construction Supplementary Planning Document (SPD).'	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Policy D2 Sustainable design, construction and energy	Amendments to entire policy: 'Sustainable development (1) Proposals for zero carbon development are strongly supported. <b>Applications</b> <del>Proposals</del> for development, including refurbishment, conversion and extensions to existing buildings, <del>are required to set out in a sustainability statement how they will</del> <b>should include information setting out how</b> deliver sustainable design and construction practice will be incorporated including (where applicable): (a) the efficient use of mineral resources and the incorporation of a proportion of recycled and/or secondary aggregates (b) waste minimisation and reusing material derived from excavation and demolition	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

**Modification number      Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))      Potential HRA Implications**

- (c) ~~the use of materials both in terms of embodied carbon and energy efficiency~~ **use of** landform, layout, building orientation, massing and landscaping **to reduce energy consumption**~~the lowest level of carbon emissions (direct and embodied);~~
- (d) ~~the highest levels of energy and water efficiency and~~ **that meets the highest national standard and**
- (e) measures that enable sustainable lifestyles for the occupants of the buildings

(2) When meeting these requirements, the energy and waste hierarchies should be followed except where it can be demonstrated that greater sustainability can be achieved by utilising measures further down the hierarchy. ~~The Sustainable Design and Construction Supplementary Planning Document (SPD) sets out guidance on appropriate standards and practice.~~

**(2a) Major development should include a sustainability statement setting out how the matters in this policy have been addressed. Smaller developments should include information proportionate to the size of the development in the planning application.**

Climate Change Adaptation

(3) ~~All D~~**developments** should be fit for purpose and remain so into the future. ~~Development proposals.~~ **Proposals for major development**



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
---------------------	--	----------------------------

are required to set out in a sustainability statement how they have incorporated adaptations for a changing climate and changing weather patterns in order to avoid increased vulnerability and offer high levels of resilience to the full range of expected impacts.

Renewable, low carbon and decentralised energy

(4) The development of low and zero carbon and decentralised energy, including (C)CHP\* distribution networks, is strongly supported and encouraged.

~~(5) All new developments are required to connect to (C)CHP distribution networks where they exist, or incorporate the necessary infrastructure for connection to future networks, unless it can be clearly demonstrated that doing so is not feasible or that utilising a different energy supply would be more sustainable.~~

(5) Proposals for development within Heat Priority Areas as shown on the Policies Map and all sufficiently large or intensive developments must ~~demonstrate that heating and cooling technologies have been selected in accordance with the following heating and cooling hierarchy unless it can be clearly demonstrated that an alternative approach would be more sustainable:~~ **demonstrate that (C)CHP has been given adequate consideration as the primary source of energy.**



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
---------------------	---	----------------------------

**(6) Where (C)CHP distribution networks already exist, new developments are required to connect to them or be connection-ready unless it can be clearly demonstrated that utilizing a different energy supply would be more sustainable or connection is not feasible.**

- ~~1 Connection to existing (C)CHP distribution networks~~
- ~~2 Site wide renewable distribution networks including renewable (C)CHP~~
- ~~3 Site wide gas-fired (C)CHP distribution networks~~
- ~~4 Renewable communal heating networks~~
- ~~5 Gas-fired communal heating networks~~
- ~~6 Individual dwelling renewable heating~~
- ~~7 Individual dwelling heating, with the exception of electric heating~~

~~(7) All (C)CHP systems are required to be scaled and operated in order to maximise the potential for carbon reduction. Developments that do not connect to or implement (C)CHP or communal heating networks should be 'connection-ready'.~~

~~(8) Energy statements must be provided to demonstrate and quantify how development will comply with the energy requirements of this policy. Guildford Borough Council will work proactively with applicants on major~~



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
---------------------	---	----------------------------

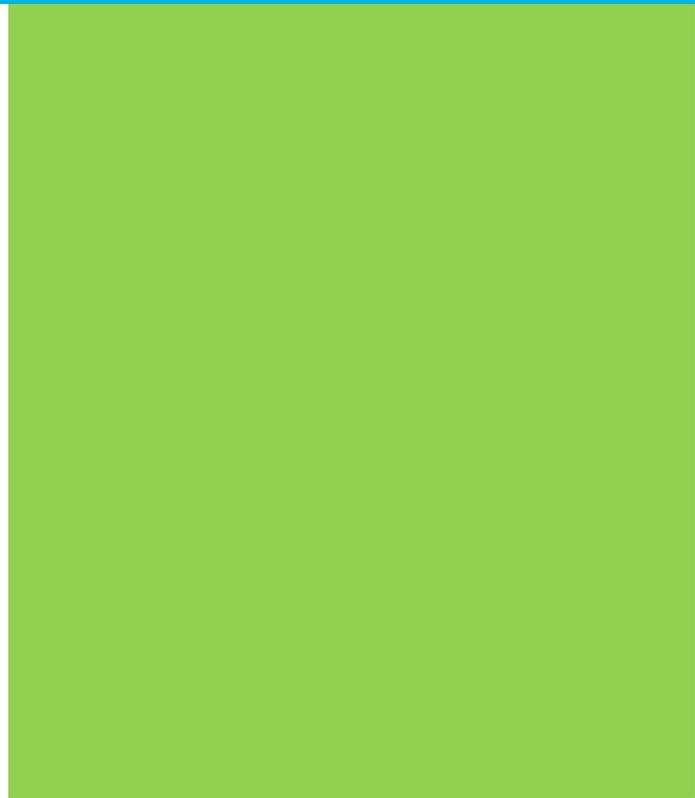
~~developments to ensure these requirements can be met.~~

~~Carbon reduction~~

(8) New buildings must achieve a reasonable reduction in carbon emissions of at least 20 per cent **below the relevant Target Emission Rate (TER) set out in the Building Regulations 2010 (as amended) (Part L)**. This should be achieved through the provision of appropriate renewable and low carbon energy technologies in the locality of the development **and improvements to the energy performance of the building**. Where it can clearly be shown that this is not possible, offsite offsetting measures in line with the energy hierarchy should be delivered. ~~Proposals should set out how this will be achieved in an energy statement.~~

(9) Retail units falling within Use Classes A1, A2, A3 and A4 in Guildford Town Centre are not subject to the carbon reduction requirement at paragraph (9).

**(10) Planning applications must include adequate information to demonstrate and quantify how proposals comply with the energy requirements at paragraphs 5-10 of this policy. For major development, this should take the form of an energy statement.**



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
4.5.16a Definitions	Addition of sentence: ‘ <b>Major development is defined as residential development of 10 or more gross new dwellings or commercial development of 1000 sqm gross new floorspace or more.</b> Sustainability and energy statements should set out a level of detail proportionate to the scale of development.’	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.5.18 Definitions	Deletion of paragraph: ‘ <del>Embodied carbon means carbon dioxide emitted during the manufacture, transport and construction of materials and the end of life emissions released when materials are recycled, incinerated or otherwise disposed of. The embodied carbon in a material is often identified through a life cycle analysis.</del> ’	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.5.18a	Deletion of paragraph: ‘ <del>Direct carbon emissions refers to the carbon emissions that result from the construction and occupation of a development, including the emissions from building services like lighting and heating.</del> ’	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.5.18b	Deletion of paragraph: ‘ <del>The lowest level of carbon emissions (direct and embodied) means that direct and embodied carbon emissions have been eliminated as a first step, then minimised and finally offset.</del> ’	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.5.20	Amendments to paragraph: ‘ <del>The highest level</del> “ <b>national standard</b> ” of for water efficiency means <b>refers to any nationally described standard for water consumption in new developments.</b> The “ <b>highest national standard</b> ” refers to the standard that has the lowest water	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p><b>consumption. At the present time, the highest national standard</b> <del>that developments should achieve</del> is the “optional requirement” described by regulation 36 paragraph 2(b) of the Building Regulations 2010 <del>as a minimum. This “optional requirement”</del> <b>which</b> sets a water efficiency standard for new <del>buildings</del> <b>dwelling</b>s of 110 litres per occupant per day. If <b>one or more</b> the “optional requirement” building regulation is tightened, or a new national standards are introduced, the <del>highest level of water efficiency will refer to the standards that have the lowest water consumption</del> <b>will apply</b>. Compliance with the “optional requirement” is assessed through the building regulation process. ‘</p>	
4.5.23	<p>Amendments to paragraph: ‘Decentralised energy means energy that is produced near where it is used, <del>rather than</del> <b>as opposed to energy produced</b> at a large plant <del>further away</del> and supplied <b>to energy users</b> through the national grid. Energy can refer to electricity and heat. The Council supports delivery of decentralised energy schemes with an aspiration that these should have some degree of community benefit and/or community ownership where this is possible.’</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.5.24	<p>Amendments to paragraph: ‘C)CHP refers to both combined cooling, heating and power (CCHP) and combined heating and power (CHP). <del>The energy hierarchy should be followed when considering which technology to use and consideration should be given to whether the need for cooling can be met through passive cooling and other design features. The solution that results in the lowest carbon emissions should be chosen.</del></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
4.5.25	<p>Deletion of paragraph: ‘<del>Where the policy refers to communal heating/cooling networks it means systems that distribute heating and cooling to a number of dwellings within one building but do not use (C)CHP as their source (i.e. they do not include power generation). Distribution networks mean systems that connect two or more distinct buildings. For the purposes of this policy, energy efficient heat pumps are considered to be renewable heating technologies.</del>’</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.5.30	<p>Amendments to paragraph: ‘New developments, except retail developments in Guildford Town Centre, but including non-retail units within mixed use developments, must achieve a reasonable reduction in carbon emissions of at least 20 per cent through the provision of appropriate low and zero carbon energy technologies in the locality of the development <b>and improvements to the energy performance of the building.</b> <del>This should be achieved after energy efficiency has been addressed, in line with the Energy Hierarchy.</del> Technologies will be considered appropriate only where they would be effective. The reduction in emissions is judged against a baseline of the relevant Target Emission Rate (TER) set out in the Building Regulations. For types of development where no TER is set out, reductions should be made against the typical predicted energy use of building services. <del>This</del> <b>The 20% figure</b> represents a minimum standard and where possible this should <b>be improved upon</b> <del>exceeded in order to meet the requirement to deliver the lowest level of carbon emissions (direct and embodied).</del> The Council will review this standard at appropriate intervals.’</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
4.5.31 Reasoned justification	Amendments to paragraph: ‘The NPPF <del>describes the role of</del> <b>requires the planning system as helping to secure shape places in a way that contributes to</b> “radical reductions” in greenhouse gas emissions and <del>helping to meet the</del> <b>plans should take a proactive approach to mitigating and adapting to climate change in line with the</b> objectives of the Climate Change Act 2008, which includes CO2 emissions reductions targets of 34 per cent by 2020 and 80 per cent by 2050 against a 1990 baseline. The UK has a further target for generating 15 per cent of energy (including heat) from renewable sources by 2020. These national targets are ambitious so our borough’s efforts at carbon reduction and increasing renewable energy must also be ambitious.’	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.5.32	Deletion of paragraph: ‘ <del>National policy, guidance and legislation indicates that local planning policy should focus on sustainable design while building regulations focus on technical standards. Therefore, new developments are required to implement sustainable design and construction measures that address carbon emissions, waste and climate change adaptation.</del> ’	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.5.38	Minor changes made: reformatting and rewording of paragraph to reflect the council’s approach to tacking pressure on water stocks.	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications						
Policy D3 Historic environment	<p>Amendments to paragraph: ‘(1) The historic environment will be conserved and enhanced in a manner appropriate to its significance. 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 will be supported.</p> <p><del>(2) Heritage assets are an irreplaceable resource and works, which would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance or special interest of the heritage asset in question.</del> <b>The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the NPPF.</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>						
Monitoring Indicators (box)	<p>Amendments to table:</p> <table border="1" data-bbox="412 1034 1361 1262"> <thead> <tr> <th data-bbox="412 1034 734 1106">Indicator</th> <th data-bbox="734 1034 1048 1106">Target</th> <th data-bbox="1048 1034 1361 1106">Data source</th> </tr> </thead> <tbody> <tr> <td data-bbox="412 1106 734 1262"><del>Percentage of appeals allowed for heritage reasons originally refused as being</del></td> <td data-bbox="734 1106 1048 1262"><del>Reduction in the percentage of appeals allowed that are considered to be</del></td> <td data-bbox="1048 1106 1361 1262">Planning <b>permissions</b> and appeals</td> </tr> </tbody> </table>	Indicator	Target	Data source	<del>Percentage of appeals allowed for heritage reasons originally refused as being</del>	<del>Reduction in the percentage of appeals allowed that are considered to be</del>	Planning <b>permissions</b> and appeals	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
Indicator	Target	Data source						
<del>Percentage of appeals allowed for heritage reasons originally refused as being</del>	<del>Reduction in the percentage of appeals allowed that are considered to be</del>	Planning <b>permissions</b> and appeals						

**Modification number**      **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))      **Potential HRA Implications**

	<p>detrimental to significance of designated or undesignated heritage assets <b>Number of planning decisions, including appeals, granting permission that results in acknowledged partial or total loss of heritage assets or acknowledged harm to their settings</b></p>	<p>detrimental to the significance of designated or undesignated heritage assets <b>N/A</b></p>		
<p>Policy D4 Character and design of new development</p>	<p>Deletion of entire policy (many of the policies aspects are added to Policy D3): <del>Introduction</del></p> <p>4.5.45a — <del>One of the core planning principles of the NPPF is to always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.</del></p> <p>4.5.46 — <del>High quality design that responds to its local context will be required on all new development. In addition to the site allocations, it will</del></p>			<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
---------------------	---	----------------------------

~~also be required on the range of other development sites that will continue to come forward through redevelopment, infilling or conversions. Some of these sites will have been identified within the latest Land Availability Assessment (LAA), whilst some will unexpectedly come forward through the planning application process.~~

~~4.5.47 — The purpose of this policy is to ensure that whilst seeking to promote the efficient use of land, this does not negatively impact upon the quality of the local environment. All new development must contribute towards achieving high quality and attractive places.~~

~~POLICY D4: Character and design of new development~~

- ~~(1) — High quality design is expected in the borough. All developments will:~~
- ~~(a) — integrate well with the natural, built and historic environment~~
  - ~~(b) — respect important public views and help create attractive new views and vistas~~
  - ~~(c) — create attractive, safe and accessible places that discourage crime and disorder through design~~
  - ~~(d) — respond meaningfully and sensitively to the site, its characteristics and constraints, and the street patterns, spaces around buildings, layout, grain, scale, massing, proportions, height and materials of surrounding buildings~~



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
---------------------	---	----------------------------

- |  |   |  |
|--|---|--|
|  | <p>(e) <del>ensure appropriate density to make the most efficient use of the land whilst responding to local character and context</del></p> <p>(f) <del>be laid out to make the best use of the natural features such as topography, trees and hedges, watercourses, ponds and levels, and enhance views into and out of the site</del></p> <p>(g) <del>promote and reinforce local distinctiveness to create a sense of place with innovative architecture encouraged in the appropriate context</del></p> <p>(h) <del>provide visual interest at pedestrian level</del></p> <p>(i) <del>be expected to have regard to and perform positively against the recommendations set out in the latest Building for Life guidance</del></p> <p>(j) <del>be expected to use art, appropriate materials and landscaping of a nature appropriate to their setting</del></p> <p>(k) <del>be designed to minimise the visual impact of traffic and parking</del></p> <p>(l) <del>conserve locally and nationally important heritage assets and conserve or enhance their settings</del></p> <p>(m) <del>have no unacceptable effect on the amenities enjoyed by the occupants of buildings in terms of privacy, noise, vibration, pollution, dust, smell and access to sunlight and daylight</del></p> <p>(n) <del>conform to the nationally described space standards as set out by the Department of Communities and Local Government (DCLG).</del></p> |  |
|--|---|--|

**Modification number**    **Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))**    **Potential HRA Implications**

~~(2) ——— In addition to the above, proposals for new development within villages will have particular regard to:~~

- ~~(a) ——— the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape~~
- ~~(b) ——— important views of the village from the surrounding landscape~~
- ~~(c) ——— views within the village of local landmarks.~~

**Definitions**

~~4.5.48 ——— Paragraph moved to D1~~

**Reasoned Justification**

~~(4.5.49 — Paragraph intentionally blank)~~

~~4.5.49a ——— Paragraph moved to D1~~

~~4.5.49b ——— The NPPF also recognises the role that public art has. Opportunities will be sought for innovative and dynamic public art that~~



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
	<p><del>has residents and artists at its core whilst celebrating and enhancing its rich heritage of architecture, landscape and public art. The Council's emerging Public Art Strategy will include consideration of the role that developers can take in providing art to enhance the environment in and around development sites, and will set out good practice and recommended commissioning processes.'</del></p>	
4.6.1 Introduction	<p>Addition of sentence: 'The timely provision of suitable, adequate infrastructure is crucial to the well-being of the borough's population, and of its economy. The Guildford borough Infrastructure Delivery Plan summarises the capacity and quality of existing infrastructure, including planned improvements. <b>The non-site specific and more general infrastructure requirements are set out in the Planning Contributions Supplementary Planning Document 2017, which will be updated as required.</b> Historically infrastructure provision and upgrading has not always kept pace with the growth of population, employment and transport demands, and in parts of the borough some infrastructure is currently at or near to capacity, or of poor quality.'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
Policy ID Infrastructure and delivery	<p>Additional sentence: '(4) <b>If appropriate, the imposition of Grampian conditions should be considered as a means to secure the provision of infrastructure when it is needed.</b> If the timely provision of infrastructure necessary to support new development cannot be secured <b>in line with</b> this policy, planning permission will be refused.'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
---------------------	---	----------------------------

Additional paragraph: **‘(5)a Where an applicant advises that their development is unviable with the policy and infrastructure requirements, the Council will consider whether these costs were taken into account in the price paid for the site (or any agreement to purchase the site). If these costs were taken into account, as is required by the Council, but there are higher costs associated with the site that were unknown at this time, then the Council will take this factor into account when considering the viability and acceptability of the proposal.’**

Deletion of paragraphs: ~~‘(6) ————— The non-site specific and more general infrastructure requirements are set out in the Planning Contributions Supplementary Planning Document 2011, which will be updated as required.~~

~~(7) ————— Where appropriate, we will collect the Community Infrastructure Levy from developments in the borough. We will use Community Infrastructure Levy receipts towards providing infrastructure to support development, and will facilitate the spending of up to one quarter of Community Infrastructure Levy receipts originating from each parish and from Guildford town on local priorities to support development.~~

~~(8) ————— In allocating developer infrastructure contributions, we will~~



Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p><del>prioritise Thames Basin Heaths Special Protection Area mitigation and avoidance in order to ensure that we meet our legal responsibilities.</del></p>	
<p>4.6.5a Reasoned justification</p>	<p>Addition of paragraph: <b>‘Through the planning system, the Council is able to ensure that there is adequate infrastructure in place to support new development. For instance, where applicable, developers will be required to demonstrate that there is adequate wastewater capacity and surface water drainage both on and off the site to serve the development, and that it would not lead to problems for existing or new users. Where there is an infrastructure capacity constraint, the Council will require the developer to set out what appropriate improvements are necessary and how they will be delivered and may use the planning system to ensure timely provision (e.g. through the imposition of Grampian-style conditions of appropriate phasing).’</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
<p>4.6.6a</p>	<p>Amendment to paragraph: ‘To ensure that the scale of development set out in the Local Plan can be delivered, we have considered the impact of the Plan policies and other requirements on the viability of development included in the Plan. <b>On this basis, we require that these impacts and related costs are accounted for in the price paid for the site (or any agreement to purchase the site). Furthermore, in line with paragraph 57 of the NPPF, applicants will need to justify the need for a viability assessment at the application stage.</b> <del>Where an</del></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p><del>applicant advises that their development is unviable with the policy and infrastructure requirements, we will consider whether these were taken into account in the price paid for the site (or option on the site). If these had been taken into account, but there are higher costs associated with the site, we will consider negotiating.'</del></p>	
4.6.6b	<p>Addition of paragraph: <b>'In allocating developer infrastructure contributions, we will prioritise Thames Basin Heaths Special Protection Area mitigation and avoidance in order to ensure that we meet our legal duties.'</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites. The prioritisation of allocating developer infrastructure contributions to the Thames Basin Heaths SPA mitigation and avoidance strategy is positive.</p>
Key Evidence (box)	<p>Addition of references; <b>'Guildford borough Proposed Submission Local Plan "June 2016 Local Plan Viability Update (Guildford Borough Council, 2017) Water Quality Assessment Stage 1 Technical Statement and Stage 2 Final Report (Guildford Borough Council, 2017)'</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
Policy ID2 Supporting the Department for Transport's "Road	<p>Addition of paragraph: <b>'In the event that there is a material delay in the anticipated completion and or a reduction in scope of the A3 Guildford (A320 Stoke interchange junction to A31 Hog's Back junction) "Road Investment Strategy" scheme from that assumed in plan-making, or cancellation of the scheme, Guildford Borough</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
Investment Strategy”	<p><b>Council will review its transport evidence base to investigate the consequent cumulative impacts of approved developments and Local Plan growth including site allocations on the safe operation and the performance of the Local Road Networks and the Strategic Road Network. In the case of material delay in the anticipated completion and or a reduction in scope in the A3 Guildford scheme, the review will consider the period up to the revised date of completion of the scheme. This review will be undertaken with input as appropriate from Surrey County Council and Highways England or any other licenced strategic highway authority appointed by the Secretary of State under the Infrastructure Act 2015. The outcome of this review will determine whether development can continue to be completed in accordance with the Local Plan trajectory or will determine whether there needs to be a review of the Local Plan.’</b></p>	
4.6.18a	<p><b>Addition of paragraph: ‘The evidence at the time of the Examination of the Local Plan was that, without the implementation of the A3 Guildford scheme, the cumulative impacts of the quantum and distribution of development in the Local Plan could be considered to become severe during the second half of the plan period. Nevertheless, the evidence also indicates that individually, site allocations may be able to be occupied in whole or substantial part without creating a severe impact on the Strategic Road Network as there are potential alternative transport measures that may reduce or limit the impact of additional traffic on the A3. A review will determine whether the proposed transport measures or additional</b></p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
	<p><b>transport measures can mitigate the cumulative impacts of development traffic on the A3 either during the period that the A3 Guildford scheme is delayed, in response to a reduction in its scope or in the event of its cancellation. If a review determines that transport measures are not able to mitigate a severe impact on the A3 then a review of the Local Plan is likely to be required.'</b></p>	
<p>Policy ID3 Sustainable transport for new development</p>	<p>Deletion of paragraphs: '(a) _____ in Controlled Parking Zones, or component areas thereof, in which the demand for on-street parking by residents of existing dwellings and, where allowed, 'pay and display' visitor parking exceeds the supply of designated on-street parking spaces, planning permission for new residential development resulting in a net increase in dwellings will be subject to a planning obligation to require that future occupants will not be eligible for on-street residents parking permits, with the exception of disabled people who will be eligible, and</p> <p>(b)(a) for residential new development in all other areas, and for all non-residential new development in the borough, or</p> <p>(5) _____ The Council will have regard to the latest Guildford Borough Parking Strategy in applying the above policy test for new residential development in Controlled Parking Zones or component areas thereof.'</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as <del>struck through</del> and additional text shown in bold))	Potential HRA Implications
4.6.4a	<p>Amendments to paragraph: ‘With respect to vehicular parking, the policy takes account of the <del>March 2015 written statement to Parliament from the Minister which stated that “Local Planning Authorities should only impose local parking standards for residential and non-residential development where there is a clear and compelling justification that it is necessary to manage their local road network.”</del><b>NPPF at paragraph 106. This allows for maximum parking standards to be set where there is a clear and compelling justification that they are necessary for optimising the density of development in town centres that are well served by public transport. The Council will bring forward a Parking Supplementary Planning Document. The policy does not preclude developers from bringing forward proposals for car-free new development.</b>’</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>
4.6.4ba Reasoned justification	<p>Addition of paragraph: ‘<b>Guildford Borough Council proposes to engage with Surrey County Council, the Local Highway Authority, to investigate the potential to amend the Traffic Regulation Order that supports the Guildford town centre Controlled Parking Zone. The forthcoming parking review may provide an opportunity to consider permit eligibility issues, particularly for new developments in areas within of the Controlled Parking Zone where existing residents’ demand exceeds the supply of spaces prioritised for their use. The possible exclusion of new developments, and any other restrictions on permit eligibility, would operate outside of the planning system.</b>’</p>	<p>No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.</p>

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications
4.6.24c Reasoned justification	Deletion of paragraph: ' <del>In the areas of the Controlled Parking Zone in which the demand for on-street resident and 'pay and display' visitor parking exceeds the supply of designated on-street parking spaces, the Local Planning Authority will apply the policy test for vehicular parking as set out. This provides an exception for disabled people who will be eligible.</del> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.6.24d Reasoned justification	Deletion of paragraph: ' <del>At present, the policy test for new residential development in Controlled Parking Zones or component areas thereof will be engaged in areas A, B, C and D of the Controlled Parking Zone.</del> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.6.24e Reasoned justification	Deletion of paragraph: ' <del>The policy does not preclude developers from bringing forward proposals for car-free new development. Any such proposal would be subject to the policy tests set out for vehicular parking.</del> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
Key Evidence (box)	Additional reference: ' <b>A Sustainable Parking Strategy for Guildford 2016 (Guildford Borough Council, 2016)</b> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.
4.6.40 Blue infrastructure	Minor changes: rewording and reformatting of paragraph opening sentence to reflect the council's aims of providing an environmentally friendly water framework that does not damage the integrity of local ecology.	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.

Modification number	Type of Change (where included <sup>9</sup> : modified text (deleted text shown as struck through and additional text shown in bold))	Potential HRA Implications		
Policy ID4 Green blue infrastructure	Minor changes: reformatting and rewording of sentences to reflect the council's aims for environmental mitigation and water pollution.	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.		
4.6.48 Definitions	Amendments to paragraph: ' <del>Non-navigable waterways</del> <b>Watercourses</b> will be protected and enhanced through the use of an eight metre wide (measured from bank top) undeveloped buffer zone within which new development will be permitted only where it benefits the ecology and/or water quality of the <del>waterway</del> <b>watercourse</b> . Existing development should not encroach any further into the buffer zone. <b>On Greenfield sites where more land is available, a wider buffer zone of a minimum of 10m, on both sides of the watercourse, that varies in size and shape as appropriate to include larger areas, is appropriate. The provision of buffer zones should be supported by a long-term ecological management plan.</b> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.		
Key Evidence (box)	Additional references: ' <b>Thames River Basin Management Plan (2015) Water Framework Directive (2000) Water Quality Assessment Stage 1 Technical Statement and Stage 2 Final Report (Guildford Borough Council, 2017)</b> '	No HRA implications. This modification does not provide for any new or elevated potential impact pathways linking policy to European sites.		
Policy 60 White Lion Walk, High Street, Guildford	Additional development site: <table border="1" data-bbox="412 1177 1361 1257"> <tr> <td data-bbox="412 1177 622 1257"><b>Allocation</b></td> <td data-bbox="622 1177 1361 1257"><b>The site is allocated for a mixed-use redevelopment, comprising approximately 50</b></td> </tr> </table>	<b>Allocation</b>	<b>The site is allocated for a mixed-use redevelopment, comprising approximately 50</b>	Likely Significant Effects  This policy provides a site allocation for 50 net new dwellings and retail provision.
<b>Allocation</b>	<b>The site is allocated for a mixed-use redevelopment, comprising approximately 50</b>			

**Modification number**    **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))    **Potential HRA Implications**

	<p><b>homes (C3) and comparison retail floorspace (A1)</b></p>	<ul style="list-style-type: none"> <li>• Thames Basin Heaths SPA is located less than 5km from the proposed development site; and</li> <li>• Thursley, Hankley and Frensham Commons SPA is located more than 9km (9.8km) south west of proposed development site.</li> </ul> <p>Due to these distances involved, there are no new linking impact pathways present relating to recreational pressure.</p> <p>In addition, as noted in relation to changes to policy S2 Planning for the borough - our spatial development strategy, the increased quantum of development provided by this policy addition has already been factored for in the air quality impact assessment.</p> <p>This modification does not provide any new linking impact pathways or exacerbate those beyond a level that has not previously been discussed and screened out.</p> <p>It is noted that this development will be a car free residential development, thus limiting an increase to atmospheric pollution of increased traffic stemming from the residential aspect of this development.</p>
<p><b>Requirements</b></p>	<p><b>(1) Retail uses on the ground floor with active frontages</b>  <b>(2) Residential uses on upper floors</b>  <b>(3) Access to residential units from both High Street and North Street</b>  <b>(4) Retain contribution to secondary shopping frontage</b>  <b>(5) Retain the existing walk-through from North Street to the High Street</b>  <b>(6) A car free site for the residential development</b></p>	
<p><b>Opportunities</b></p>	<p><b>(1) An element of food and drink (A3) and drinking establishments (A4)</b>  <b>(2) Re-provide the existing retail floorspace on the site with larger, more commercially viable retail units on the ground floor</b></p>	

Modification number    Type of Change (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))    Potential HRA Implications

**Description**

<b>Location</b>	<b>Guildford Town Centre</b>
<b>Ward</b>	<b>Holy Trinity</b>
<b>Ownership</b>	<b>Private</b>
<b>Area (size)</b>	<b>0.39 ha</b>
<b>Existing use</b>	<b>Mixture of retail uses</b>
<b>LAA reference</b>	<b>Site 2370</b>
<b>Key consideration</b>	<ul style="list-style-type: none"> <li><b>(1) Conservation Area</b></li> <li><b>(2) Town Centre Secondary Shopping Area</b></li> <li><b>(3) Circulation/amenity space for residential units</b></li> <li><b>(4) Setting of locally listed buildings</b></li> <li><b>(5) Within a district heat priority area</b></li> <li><b>(6) SPZ1</b></li> </ul>



**Modification number**    **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))    **Potential HRA Implications**

Policy A61  
Land at Aaron's Hill, Godalming

**Additional development:**

<b>Allocation</b>	<b>This site is allocated for approximately 200 homes (C3), including some self-build and custom house building plots</b>
<b>Requirements</b>	<p><b>(1) Comprehensive masterplanning of the site to ensure that development is successfully integrated with the adjoining development site within Waverley borough and the surrounding landscape context</b></p> <p><b>(2) Improve the bridleway connecting Halfway Lane and New Way (in Waverley borough) for pedestrians and cyclists</b></p> <p><b>(3) Avoid adverse impacts of development on the Wealden Heaths SPA through appropriate avoidance measures potentially including SANG</b></p> <p><b>(4) An application level Habitat Regulations Assessment</b></p> <p><b>(5) Agreement with Natural England that the development will have no adverse impact on the Wealden Heaths SPA</b></p> <p><b>(6) Sensitive design at site boundaries that has significant regard to the transition from urban to greenfield</b></p>

**Likely Significant Effect**

- This policy provides a site allocation for 200 net new dwellings. Thursley, Hankley and Frensham Commons SPA is located 3km south west.
- Thames Basin Heaths SPA is located 9.3km north; and

Due to these distances involved, there are no new impact pathways present relating to recreational pressure that could link to the Thames Basin Heaths SPA, however, due to the close proximity of the site to Thursley, Hankley and Frensham Commons SPA this site allocation cannot be screened out and will be subject to Appropriate Assessment.

In addition, as noted in relation to changes to policy S2 Planning for the borough - our spatial development strategy, the increased quantum of development provided by this policy addition has already been factored for in the air quality impact assessment.

**Modification number**    **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))    **Potential HRA Implications**

<b>Opportunities</b>	<p>(1)            <b>Green corridors and linkages to habitats outside of the site</b></p> <p>(2)            <b>Encourage connections with services and facilities in Godalming</b></p>
----------------------	--

**Description**

<b>Location</b>	<b>Godalming</b>
<b>Ward</b>	<b>Pilgrims</b>
<b>Ownership</b>	<b>Private</b>
<b>Area (size)</b>	<b>9.3 ha</b>
<b>Existing use</b>	<b>Fields</b>
<b>LAA reference</b>	<b>Site 2254</b>
<b>Key consideration</b>	<p>(1) <b>Wealden Heaths SPA</b></p> <p>(2) <b>Cross boundary site</b></p> <p>(3) <b>Impact on landscape (AGLV)</b></p>



**Modification number**    **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))    **Potential HRA Implications**

		<p><b>(4) Green Infrastructure</b>  <b>(5) Positive linkages with Green Oak Primary School</b></p>								
<p>Policy A62                  Land at Hornhatch Farm, adjoining New Road, Chilworth</p>	<p>Additional development site:</p> <table border="1"> <tr> <td><b>Allocation</b></td> <td><b>This site is allocated for approximately 80 homes (C3)</b></td> </tr> <tr> <td><b>Requirements</b></td> <td><b>(1) Sensitive design, siting and form of development that has significant regard to its location on the edge of village and views from the AONB/AGLV</b></td> </tr> <tr> <td><b>Opportunities</b></td> <td><b>(1) Green corridors and linkages to habitats outside of the site</b></td> </tr> </table> <p><b>Description:</b></p> <table border="1"> <tr> <td><b>Location</b></td> <td><b>Chilworth</b></td> </tr> </table>	<b>Allocation</b>	<b>This site is allocated for approximately 80 homes (C3)</b>	<b>Requirements</b>	<b>(1) Sensitive design, siting and form of development that has significant regard to its location on the edge of village and views from the AONB/AGLV</b>	<b>Opportunities</b>	<b>(1) Green corridors and linkages to habitats outside of the site</b>	<b>Location</b>	<b>Chilworth</b>	<p><b>Likely Significant Effect</b></p> <p>This policy provides a site allocation for 80 net new dwellings.</p> <ul style="list-style-type: none"> <li>This site is located between 5km and 7km from both the Thames Basin Heaths SPA, although more than 10km from Thursley, Hankley and Frensham Commons SPA</li> </ul> <p>Due to these distances involved, there is the potential for a recreational pressure effect on the Thames Basin Heaths SPA.</p> <p>In addition, as noted in relation to changes to policy S2 Planning for the borough - our spatial development strategy, the increased quantum of development provided by this policy addition has already been factored for in the air quality impact assessment.</p>
<b>Allocation</b>	<b>This site is allocated for approximately 80 homes (C3)</b>									
<b>Requirements</b>	<b>(1) Sensitive design, siting and form of development that has significant regard to its location on the edge of village and views from the AONB/AGLV</b>									
<b>Opportunities</b>	<b>(1) Green corridors and linkages to habitats outside of the site</b>									
<b>Location</b>	<b>Chilworth</b>									

**Modification number**    **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))    **Potential HRA Implications**

	<table border="1"> <tr> <td><b>Ward</b></td> <td><b>Shalford</b></td> </tr> <tr> <td><b>Ownership</b></td> <td><b>Private</b></td> </tr> <tr> <td><b>Area (size)</b></td> <td><b>4.5 ha</b></td> </tr> <tr> <td><b>Existing use</b></td> <td><b>Fields</b></td> </tr> <tr> <td><b>LAA reference</b></td> <td><b>Site 12</b></td> </tr> <tr> <td><b>Key considerations</b></td> <td><b>(6) Landscape (7) Green Infrastructure</b></td> </tr> </table>	<b>Ward</b>	<b>Shalford</b>	<b>Ownership</b>	<b>Private</b>	<b>Area (size)</b>	<b>4.5 ha</b>	<b>Existing use</b>	<b>Fields</b>	<b>LAA reference</b>	<b>Site 12</b>	<b>Key considerations</b>	<b>(6) Landscape (7) Green Infrastructure</b>	<p>This modification does not provide any new linking impact pathways or exacerbate those beyond a level that has not previously been discussed and screened out.</p>
<b>Ward</b>	<b>Shalford</b>													
<b>Ownership</b>	<b>Private</b>													
<b>Area (size)</b>	<b>4.5 ha</b>													
<b>Existing use</b>	<b>Fields</b>													
<b>LAA reference</b>	<b>Site 12</b>													
<b>Key considerations</b>	<b>(6) Landscape (7) Green Infrastructure</b>													
<p>Policy A63 Land west of Alderton's Farm, Send Marsh Road, Send</p>	<p>Additional development site:</p> <table border="1"> <tr> <td><b>Allocation</b></td> <td><b>This site is allocated for approximately 120 homes (C3), including some self-build and custom house building plots</b></td> </tr> <tr> <td><b>Requirements</b></td> <td><b>(1) Sensitive design at site boundaries that has significant regard to the transition from village to greenfield (2) No unacceptable impact on trees and</b></td> </tr> </table>	<b>Allocation</b>	<b>This site is allocated for approximately 120 homes (C3), including some self-build and custom house building plots</b>	<b>Requirements</b>	<b>(1) Sensitive design at site boundaries that has significant regard to the transition from village to greenfield (2) No unacceptable impact on trees and</b>	<p>Likely Significant Effects</p> <p>This policy provides a site allocation for 120 net new dwellings.</p> <ul style="list-style-type: none"> <li>• Thames Basin Heaths SPA is located within 5km of the proposed development site; and</li> <li>• Thursley, Hankley and Frensham commons is</li> </ul>								
<b>Allocation</b>	<b>This site is allocated for approximately 120 homes (C3), including some self-build and custom house building plots</b>													
<b>Requirements</b>	<b>(1) Sensitive design at site boundaries that has significant regard to the transition from village to greenfield (2) No unacceptable impact on trees and</b>													

**Modification number**    **Type of Change** (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))    **Potential HRA Implications**

	<b>hedgerows</b>	located 17.2km south west of the proposed development site.
<b>Opportunities</b>	<p>(1) <b>Green corridors and linkages to habitats outside of the site</b></p> <p>(2) <b>Encourage connections with services and facilities in the village</b></p>	
<b>Description</b>		
<b>Location</b>	<b>Send</b>	<p>As noted in relation to changes to policy S2 Planning for the borough - our spatial development strategy, the increased quantum of development provided by this policy addition has already been factored for in the air quality impact assessment.</p> <p>This modification does not provide any new linking impact pathways or exacerbate those beyond a level that has not previously been discussed and screened out.</p>
<b>Ward</b>	<b>Send</b>	
<b>Ownership</b>	<b>Private</b>	
<b>Area (size)</b>	<b>6.8 ha</b>	
<b>Existing use</b>	<b>Fields</b>	
<b>LAA reference</b>	<b>Site 29</b>	
<b>Key considerations</b>	<b>(8) Green Infrastructure</b>	

**Modification number**    **Type of Change (where included<sup>9</sup>: modified text (deleted text shown as struck through and additional text shown in bold))**    **Potential HRA Implications**

Policy A64  
Land between  
Glaziers Lane  
and Strawberry  
Farm, Flexford

Additional development site:

<b>Allocation</b>	This site is allocated for approximately 105 homes (C3), including some self-build and custom house building plots
<b>Requirements</b>	(1) Sensitive design at site boundaries that has significant regard to the transition from village to greenfield
<b>Opportunities</b>	(1) Green corridors and linkages to habitats outside of the site

Description

Location	Flexford
Ward	Normandy
Ownership	Private
Area (size)	5.75 ha
Existing use	Fields

Likely Significant Effect

This policy provides a site allocation for 105 net new dwellings.

- Thames Basin Heaths SPA is located 2.1km north west of proposed development site; and
- Thursley, Hankley and Frensham commons is located 7.3km south of the development site.

Due to the proximity of the site allocation to the Thames Basin Heaths SPA, there is potential for this site allocation to link to the SPA via both increased recreational pressure and atmospheric pollution.

However, both the SANG assessment and the air quality modelling previously undertaken were for a higher quantum of development than was previously proposed and this increase in 105 dwellings can be screened out from further consideration as no new impact pathways are identified or exacerbated beyond levels previously modelled.

**Modification number**    **Type of Change (where included<sup>9</sup>: modified text (deleted text shown as ~~struck through~~ and additional text shown in bold))**    **Potential HRA Implications**

LAA reference	Site 2010	
Key considerations	(9) Fishing pond (10) Green Infrastructure	

© 2018 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) for sole use of our client (the “Client”) in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.