

# Guildford Local Plan Habitats Regulations Assessment

Local Plan Part 2: Development Management Policies  
Issues and Preferred Options Consultation

Guildford Borough Council

Project number: 60616479

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## Quality information

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# 1. Introduction

## Scope of the Project

- 1.1 Guildford Local Plan Part 1 was adopted in 2019. AECOM have been appointed to undertake the HRA of the Guildford Local Plan Part 2: Development Management Policies (LPP2). The objectives of this assessment are to:
  - Identify any aspects of the emerging LPP2 document that would have the potential to cause a likely significant effect on, or adverse effect on the integrity of, European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites), either in isolation or in combination with other plans and projects, and;
  - Advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.
- 1.2 The HRA of the Guildford LPP2 is required to determine if there are any realistic linking pathways present between a European site and the LPP2 and where Likely Significant Effects cannot be screened out, an analysis to inform Appropriate Assessment to be undertaken to determine if adverse effects on the integrity of the European sites will occur as a result of the Local Plan alone or in combination with other plans and projects.

## Legislation

- 1.1 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (**Box 1**). The ultimate aim of the Habitats Regulations is to “*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*”. This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status. European sites (also called Natura 2000 sites) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites.

### Box 1: The legislative basis for Appropriate Assessment

#### **Conservation of Habitats and Species Regulations 2017 (as amended)**

The Regulations state that:

*“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... must make an appropriate assessment of the implications for the plan or project in view of that site’s conservation objectives... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site.”*

- 1.2 The Habitats Regulations applies the precautionary principle to European sites (SAC and SPA). As a matter of UK Government policy, Ramsar sites are given equivalent status. For the purposes of this assessment candidate SACs (cSACs), proposed SPAs (pSPAs) and proposed Ramsar (pRamsar) sites are all treated as fully designated sites. In this report we use the term “European sites” to refer collectively to the sites listed in this paragraph.
- 1.3 Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

- 1.4 In 2018, the ‘People Over Wind’ European Court of Justice (ECJ) ruling<sup>1</sup> determined that ‘mitigation’ (i.e. measures that are specifically introduced to avoid or reduce the harmful effects of a plan or project on European sites) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the appropriate assessment stage. Appropriate assessment is not a technical term: it simply means ‘an assessment that is appropriate’ for the plan or project in question. As such, the law purposely does not prescribe what it should consist of or how it should be presented; these are decisions to be made on a case by case basis by the competent authority. The UK is no longer part of the European Union and transitional arrangements will end in December 2020. However, for the purposes of this assessment it is assumed as a precaution that the UK courts may continue to consider existing ECJ rulings on HRA matters as useful jurisprudence even after this date.
- 1.5 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

## Report Layout

- 1.6 **Chapter 2** of this report explains the process by which the HRA has been carried out. **Chapter 3** explores the relevant pathways of impact. **Chapter 4** presents the Test of Likely Significant Effects of the policies and site allocations of the Plan considered ‘alone’ and ‘in-combination’. **Chapter 5** presents the conclusions.

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<sup>1</sup> Case C-323/17

## 2. Methodology

### Introduction

- 2.1 This section sets out the approach and methodology for undertaking the Habitats Regulations Assessment (HRA). HRA itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument. Therefore, there is no direct relationship to the National Planning Policy Framework (NPPF) and the 'Tests of Soundness'.

### A Proportionate Assessment

- 2.2 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.
- 2.3 However, the draft MHCLG guidance<sup>2</sup> (described in greater detail later in this chapter) makes it clear that when implementing HRA of land-use plans, the Appropriate Assessment (AA) should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:
- 2.4 *"The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project."*
- 2.5 More recently, the Court of Appeal<sup>3</sup> ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be "*achieved in practice*" then this would suffice to meet the requirements of the Habitat Regulations. This ruling has since been applied to a planning permission (rather than a Plan document)<sup>4</sup>. In this case the High Court ruled that for "*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations*".
- 2.6 In other words, there is a tacit acceptance that AA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers as illustrated in **Box 2**.

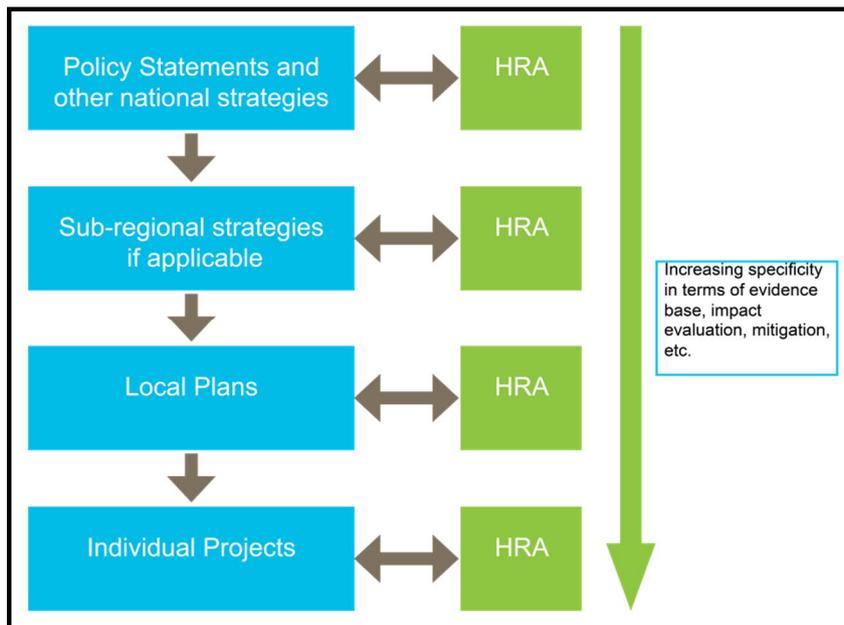
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<sup>2</sup> MHCLG (2006) Planning for the Protection of European Sites, Consultation Paper

<sup>3</sup> No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17<sup>th</sup> February 2015

<sup>4</sup> High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

## Box 2: Tiering in HRA of Land Use Plans



- 2.7 The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt (within the limits of reasonableness); it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon an internationally designated site unless it can be clearly established otherwise.

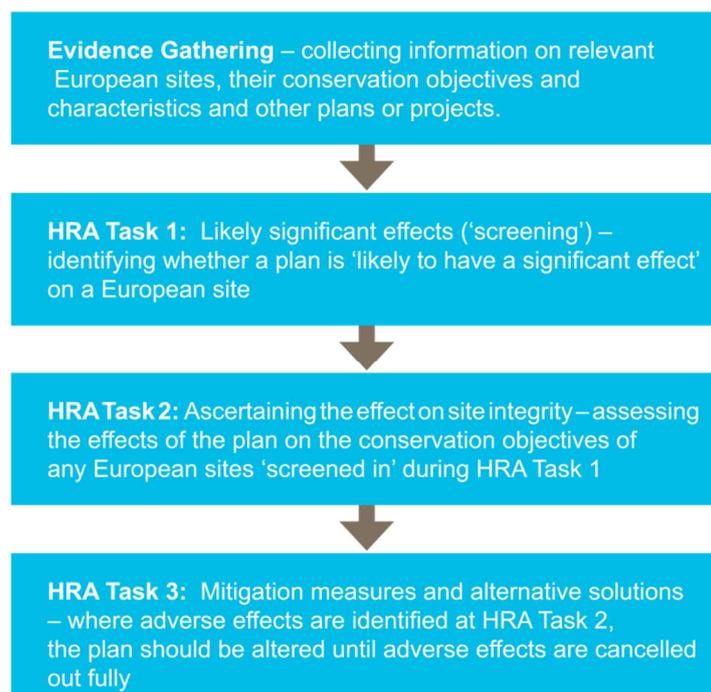
## The Process of HRA

- 2.8 The HRA is being carried out in the continuing absence of formal central Government guidance. The former DCLG (now MHCLG) released a consultation paper on AA of Plans in 2006<sup>5</sup>. As yet, no further formal guidance has emerged from MHCLG on the assessment of plans. However, Natural England has produced its own informal internal guidance and central government have released general guidance on appropriate assessment<sup>6</sup>
- 2.9 **Box 3** outlines the stages of HRA according to the draft MHCLG guidance (which, as government guidance applicable to English authorities is considered to take precedence over other sources of guidance). The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no likely significant effects remain.

<sup>5</sup> MHCLG (2006) Planning for the Protection of European Sites, Consultation Paper

<sup>6</sup> <https://www.gov.uk/guidance/appropriate-assessment>

### Box 3: Four-Stage Approach to Habitats Regulations Assessment



2.10 The following process has been adopted for carrying out the subsequent stages of the HRA.

### Task One: Test of Likely Significant Effect

2.11 The first stage of any Habitats Regulations Assessment is a test of Likely Significant Effect - essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

2.12 *“Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?”*

2.13 In evaluating significance, AECOM have relied on professional judgment and experience of working with the other local authorities on similar issues. The level of detail concerning developments that will be permitted under land use plans is rarely sufficient to make a detailed quantification of effects. Therefore, a precautionary approach has been taken (in the absence of more precise data) assuming as the default position that if a likely significant effect (LSE) cannot be confidently ruled out, then the assessment must be taken the next level of assessment Task Two: Appropriate Assessment. This is in line with the April 2018 court ruling relating to 'People Over Wind' where mitigation and avoidance measures are to be included at the next stage of assessment.

### Task Two: Appropriate Assessment

2.14 European Site(s) which have been 'screened in' during the previous Task have a detailed assessment undertaken on the effect of the policies on the European site(s) site integrity. Avoidance and mitigation measures to avoid adverse significant effects are taken into account or recommended where necessary.

2.15 As established by case law, 'appropriate assessment' is not a technical term; it simply means whatever further assessment is necessary to confirm whether there would be adverse effects on the integrity of any European sites that have not been dismissed at screening. Since it is not a technical term it has no firmly established methodology except that it essentially involves repeating the analysis for the likely significant effects stage, but to a greater level of detail on a

smaller number of policies and sites, this time with a view to determining if there would be adverse effects on integrity.

- 2.16 One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment takes any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).

## The Scope

- 2.17 There is no pre-defined guidance that dictates the physical scope of a HRA of a Local Plan. Therefore, in considering the physical scope of the assessment we were guided primarily by the identified impact pathways rather than by arbitrary 'zones'. Current guidance suggests that the following European sites be included in the scope of assessment:

- All sites within the Guildford Borough boundary; and
- Other sites shown to be linked to development within the Borough boundary through a known 'pathway' (discussed below).

- 2.18 Briefly defined, pathways are routes by which a change in activity within the Local Plan area can lead to an effect upon a European site. In terms of the second category of European site listed above, DCLG guidance states that the AA should be '*proportionate to the geographical scope of the [plan policy]*' and that '*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*' (CLG, 2006, p.6).

- 2.19 There are two European sites which fall partially within Guildford Borough - the Thames Basin Heaths (TBH) Special Protected Area (SPA) and Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) (which overlaps with the SPA).

- 2.20 During HRA of previous stages of the new Local Plan, (detailed in separate reports) it was possible to conclude, in consultation with Natural England, that only the Thames Basin Heaths SPA required further consideration as the Guildford Local Plan and associated DPDs and SPDs are developed, primarily due to possible likely significant effects through recreational pressure, urbanisation and reduced air quality. This HRA report therefore focuses on that SPA.

## The 'in combination' Scope

- 2.21 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European designated site(s) in question.

- 2.22 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee<sup>7</sup> case.

- 2.23 For the purposes of this HRA, we have determined that the key other documents with a potential for in-combination effects are:

- Guildford Local Plan Part 1: Strategy and Sites (2015 – 2034) (Adopted April 2019)
- Waverley Local Plan Part 1: Strategic Policies and Sites (Adopted February 2018)

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<sup>7</sup> Waddenzee case (Case C-127/02, [2004] ECR-I 7405)

- Emerging Waverley Local Plan Part 2: Site Allocations and Development Management Policies (Preferred Options Stage)
- Emerging Surrey Heath Local Plan 2016 to 2032 (Consultation 2020)
- Emerging Woking Local Development Documents 2027
- Emerging Elmbridge Local Development Scheme 2019 – 2022 (Options Consultation)
- Emerging Mole Valley Local Plan (2018 – 2033) (Public Consultation)
- Rushmoor Local Plan to 2032 (Adopted February 2019)
- Guildford Thames Basin Heaths SPA Supplementary Planning Document (Adopted July 2017)
- Thames Water Revised Draft Water Resources Management Plan 2019 (October 2018)

## 3. Pathways of Impact

3.1 The following pathways of impact are considered relevant to the HRA of LPP2 as they were to LPP1:

- Urbanisation
- Recreational Pressure
- Atmospheric Pollution
- Water Quality and Resources

### Urbanisation

3.2 This impact is closely related to recreational pressure, in that they both result from increased populations within close proximity to sensitive sites. Urbanisation is considered separately as the detail of the impacts is distinct from the trampling, disturbance and dog-fouling that results specifically from recreational activity. The list of urbanisation impacts can be extensive, but core impacts can be singled out:

- *Increased fly-tipping* - Rubbish tipping is unsightly but the principle adverse ecological effect of tipping is the introduction of invasive alien species with garden waste. Garden waste results in the introduction of invasive aliens precisely because it is the 'troublesome and over-exuberant' garden plants that are typically thrown out<sup>8</sup>. Alien species may also be introduced deliberately or may be bird-sown from local gardens.
- *Cat predation* - A survey performed in 1997 indicated that nine million British cats brought home 92 million prey items over a five-month period<sup>9</sup>. A large proportion of domestic cats are found in urban situations, and increasing urbanisation is likely to lead to increased cat predation.

3.3 The most detailed consideration of the link between relative proximity of development to European sites and damage to interest features has been carried out with regard to the Thames Basin Heaths SPA.

3.4 After extensive research, Natural England and its partners produced a 'Delivery Plan' which made recommendations for accommodating development while also protecting the interest features of the European site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development. While the zones relating to recreational pressure expanded to 5km (as this was determined from visitor surveys to be the principal recreational catchment for this European site), that concerning other aspects of urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats, but also including recreational pressure, fly tipping, increased incidence of fires and general urbanisation) was determined at 400m from the SPA boundary. The delivery plan concluded that the adverse effects of any development located within 400m of the SPA boundary could not be mitigated, in part because this was the range within cats could be expected to roam as a matter of routine and there was no realistic way of restricting their movements, and as such, no new housing should be located within this zone.

3.5 Guildford Council is a participatory organisation within the Thames Basin Heaths SPA Delivery Plan, including the prohibition on net new housing within 400m of the SPA.

### Recreational Pressure

3.6 Consultation for the HRA of the South East Plan (now revoked, but with the exception of Policy NRM6 that seeks to protect the Thames Basin Heaths SPA) revealed that potentially damaging

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<sup>8</sup> Gilbert, O. & Bevan, D. 1997. The effect of urbanisation on ancient woodlands. *British Wildlife* 8: 213-218.

<sup>9</sup> Woods, M. et al. 2003. Predation of wildlife by domestic cats *Felis catus* in Great Britain. *Mammal Review* 33, 2 174-188

levels of recreational pressure are already faced by many European sites. Recreational use of a site has the potential to:

- Cause disturbance to sensitive species, particularly ground-nesting birds such as woodlark and nightjar, and wintering wildfowl;
- Prevent appropriate management or exacerbate existing management difficulties;
- Cause damage through erosion; and
- Cause eutrophication as a result of dog fouling.

3.7 Different types of European sites (e.g. heathland, chalk grassland) are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

3.8 The effects of recreation on heathland sites have been described in a series of English Nature Research Reports<sup>10</sup>. It would appear that recreational pressure can have a significant adverse effect on the Annex 1 bird species for which the SPAs in this area are designated. Disturbance can have an adverse effect in various ways, with increased nest predation by natural predators as a result of adults being flushed from the nest and deterred from returning to it by the presence of people and dogs likely to be a particular problem. A literature review on the effects of human disturbance on bird breeding found that 36 out of 40 studies reported reduced breeding success as a consequence of disturbance<sup>11</sup>. The main reasons given for the reduction in breeding success were nest abandonment and increased predation of eggs or young. Over years, studies of other species have shown that birds nest at lower densities in disturbed areas, particularly when there is weekday as well as weekend pressure<sup>12</sup>.

3.9 A number of studies have shown that birds are affected more by dogs and people with dogs than by people alone, with birds flushing more readily, more frequently, at greater distances and for longer (Underhill-Day, 2005). In addition, dogs, rather than people, tend to be the cause of many management difficulties, notably by worrying grazing animals, and can cause eutrophication near paths. Nutrient-poor habitats such as heathland are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces<sup>13</sup>.

3.10 Underhill-Day (2005) summarises the results of visitor studies that have collected data on the use of semi-natural habitat by dogs. In surveys where 100 observations or more were reported, the mean percentage of visitors who were accompanied by dogs was 54.0%.

3.11 However these studies need to be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their population<sup>14</sup>. A recent literature review undertaken for the RSPB<sup>15</sup> also urges caution when

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<sup>10</sup> Liley, D. and R.T. Clarke (2002) – Urban development adjacent to heathland sites in Dorset: the effect on the density and settlement patterns of Annex 1 bird species. *English Nature Research Reports*, No. 463.

Murison, G. (2002) – The impact of human disturbance on the breeding success of nightjar *Caprimulgus europaeus* on heathlands in south Dorset, England. *English Nature Research Reports*, No. 483.

Land Use Consultants (2005) – Going, going, gone? The cumulative impact of land development on biodiversity in England. *English Nature Research Reports*, No. 626.

Rose, R.J. and R.T. Clarke (2005) – Urban impacts on Dorset Heathlands: Analysis of the heathland visitor questionnaire survey and heathland fires incidence data sets. *English Nature Research Reports*, No. 624.

Tyldesley, D. and associates (2005) – Urban impacts on Dorset heaths: A review of authoritative planning and related decisions. *English Nature Research Reports*, No. 622.

Underhill-Day, J.C. (2005) – A literature review of urban effects on lowland heaths and their wildlife. *English Nature Research Reports*, No. 623.

<sup>11</sup> Hockin, D., M. Oundsted, M. Gorman, D. Hill, V. Keller and M.A. Barker (1992) – Examination of the effects of disturbance on birds with reference to its importance in ecological assessments. *Journal of Environmental Management*, **36**, 253-286.

<sup>12</sup> Van der Zande, A.N., J.C. Berkhuizen, H.C. van Letesteyn, W.J. ter Keurs and A.J. Poppelaars (1984) – Impact of outdoor recreation on the density of a number of breeding bird species in woods adjacent to urban residential areas. *Biological Conservation*, **30**, 1-39.

<sup>13</sup> Shaw, P.J.A., K. Lankey and S.A. Hollingham (1995) – Impacts of trampling and dog fouling on vegetation and soil conditions on Headley Heath. *The London Naturalist*, **74**, 77-82.

<sup>14</sup> Gill et al. (2001) - Why behavioural responses may not reflect the population consequences of human disturbance. *Biological Conservation*, **97**, 265-268

<sup>15</sup> Woodfield & Langston (2004) - Literature review on the impact on bird population of disturbance due to human access on foot. *RSPB research report* No. 9.

extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to local environmental conditions. These facts have to be taken into account when attempting to predict the impacts of future recreational pressure on European sites.

- 3.12 It should be emphasised that recreational use is not inevitably a problem. Many European sites are also National Nature Reserves (e.g. Thursley Common) or nature reserves managed by wildlife trusts and the RSPB. At these sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.
- 3.13 Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered.

## Thames Basin Heaths SPA

- 3.14 In 2005, a visitor assessment of the Thames Basin Heaths SPA<sup>16</sup> determined that the majority of visitors travel by car and drive relatively short distances (less than 5km). This helped determine that any new residential development within 5km of the SPA could result in likely significant effects upon the SPA. To ensure development within Guildford did not result in likely significant effects upon the Thames Basin Heaths SPA, the Council produced a Thames Basin Heaths SPA avoidance strategy which forms the basis of planning guidance in relation to new residential development and its impact upon the SPA. The current iteration of the Council's avoidance strategy is the Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 SPD (adopted in July 2017).

## Atmospheric Pollution

- 3.15 The main pollutants of concern for European sites are oxides of nitrogen (NO<sub>x</sub>), ammonia (NH<sub>3</sub>) and sulphur dioxide (SO<sub>2</sub>). NO<sub>x</sub> can have a directly toxic effect upon vegetation. In addition, greater NO<sub>x</sub> or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

**Table 1: Main sources and effects of air pollutants on habitats and species**

Pollutant	Source	Effects on habitats and species
Acid deposition	SO <sub>2</sub> , NO <sub>x</sub> and ammonia all contribute to acid deposition. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased nitrogen emissions may cancel out any gains produced by reduced sulphur levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH <sub>3</sub> )	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants such as the products of SO <sub>2</sub> and NO <sub>x</sub> emissions to produce fine ammonium (NH <sub>4</sub> <sup>+</sup> ) containing aerosol which may be transferred much longer distances (can therefore be a significant trans-boundary issue.)	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH <sub>3</sub> is rapidly deposited, some of the most acute problems of NH <sub>3</sub> deposition are for small relict nature reserves located in intensive agricultural landscapes.

<sup>16</sup> Liley, D, Jackson, D. & Underhill-Day, J. (2005). Visitor Access Patterns on the Thames Basin Heaths. English Nature Research Report 682. English Nature, Peterborough

<p>Nitrogen oxides NO<sub>x</sub></p>	<p>Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations.</p>	<p>Deposition of nitrogen compounds (nitrates (NO<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>) and nitric acid (HNO<sub>3</sub>)) can lead to both soil and freshwater acidification. In addition, NO<sub>x</sub> can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.</p>
<p>Nitrogen (N) deposition</p>	<p>The pollutants that contribute to nitrogen deposition derive mainly from NO<sub>x</sub> and NH<sub>3</sub> emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.</p>	<p>Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.</p>
<p>Ozone (O<sub>3</sub>)</p>	<p>A secondary pollutant generated by photochemical reactions from NO<sub>x</sub> and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.</p>	<p>Concentrations of O<sub>3</sub> above 40 ppb can be toxic to humans and wildlife, and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.</p>
<p>Sulphur Dioxide SO<sub>2</sub></p>	<p>Main sources of SO<sub>2</sub> emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO<sub>2</sub> emissions have decreased substantially in the UK since the 1980s.</p>	<p>Wet and dry deposition of SO<sub>2</sub> acidifies soils and freshwater and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.</p>

3.16 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO<sub>2</sub> or NH<sub>3</sub> emissions will be associated with Local Plans. NO<sub>x</sub> emissions, however, are dominated by the output of vehicle exhausts. Within a 'typical' housing development, by far the largest contribution to NO<sub>x</sub> (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison<sup>17</sup>. Emissions of NO<sub>x</sub> could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the LDF.

3.17 According to the World Health Organisation, the critical NO<sub>x</sub> concentration (critical threshold) for the protection of vegetation is 30 µgm<sup>-3</sup>; the threshold for sulphur dioxide is 20 µgm<sup>-3</sup>. In addition,

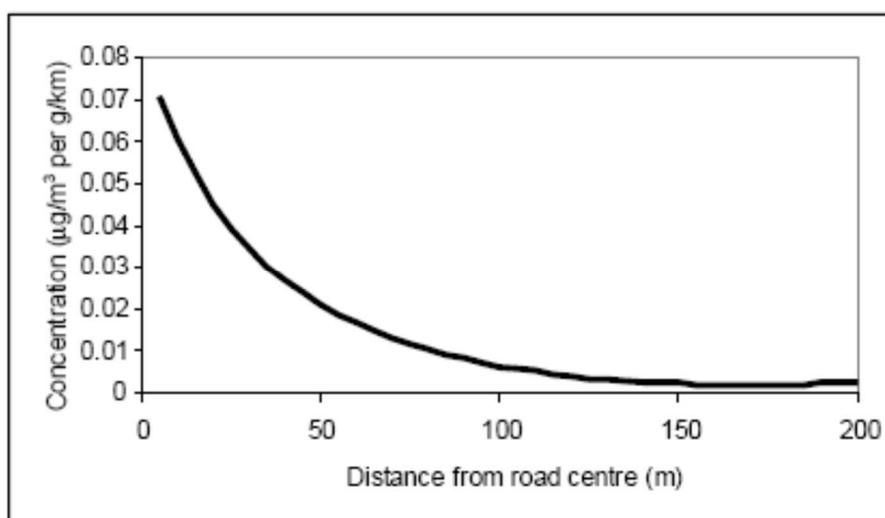
<sup>17</sup> Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

ecological studies have determined ‘Critical Loads’<sup>18</sup> of atmospheric nitrogen deposition (that is, NO<sub>x</sub> combined with ammonia NH<sub>3</sub>) for key habitats within European sites.

## Local Air Pollution

3.18 According to the Department of Transport’s Transport Analysis Guidance, “Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant”<sup>19</sup>.

Figure 1: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT)



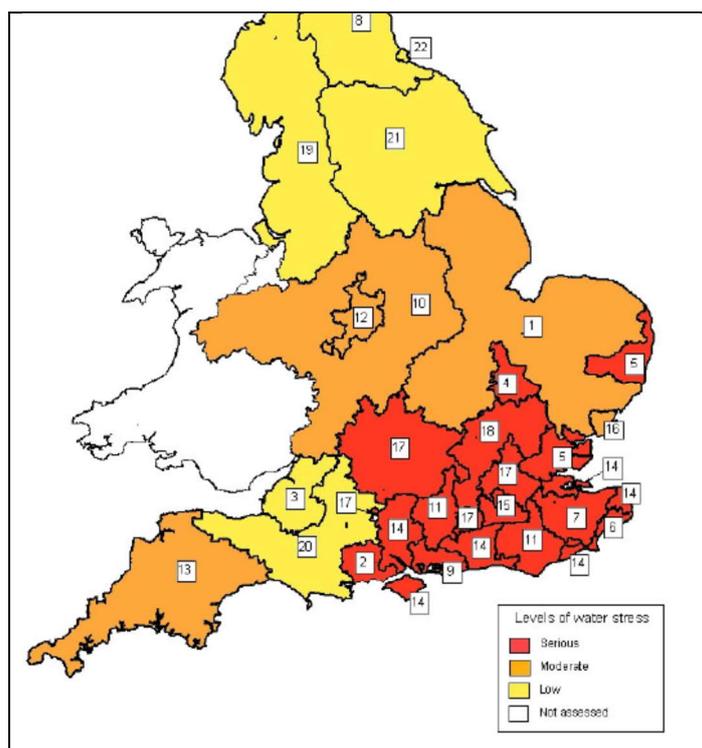
## Water Quality and Resources

### Water Abstraction

3.19 The South East is generally an area of high water-stress (see **Figure 2**).

<sup>18</sup> The Critical Load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

<sup>19</sup> [www.webtag.org.uk/archive/feb04/pdf/feb04-333.pdf](http://www.webtag.org.uk/archive/feb04/pdf/feb04-333.pdf)



**Figure 2: Areas of water stress within England. It can be seen from this map that Surrey is classified as being an area of serious water stress (coded red).**

3.20 Development within Guildford Borough over the plan period will increase water demand.

3.21 According to the Wey Catchment Abstraction Management Strategy Guildford Borough lies within several Water Resource Management Units:

- Cranleigh Waters;
- Tillingbourne;
- Guildford
- Hoe Stream; and
- Weybridge

3.22 Guildford borough lies within Thames Water's Guildford Water Resource Zone. According to the revised draft Water Resource Management Plan (2019) this water resource zone is calculated to be in surplus over the entire plan period under normal conditions but may have deficits under peak demand. Thames Water intends to extend their water efficiency, leakage reduction and metering programmes into the zone in order to conserve resources. Affinity Water have also identified the need to employ measures to ensure sustainable supply in their 'Wey' Water Resource Zone, as have South East Water in their WRZ4 and WRZ5, which extend east of Aldershot. The determination of surplus or deficit does take account of environmental limits and the implication is that there should be no requirement for damaging levels of abstraction from any of the aquifers connected to these European sites.

## Water Quality

3.23 Development within Guildford Borough over the plan period will increase wastewater production. Wastewater from the District is treated by Thames Water and discharges to the River Wey or River Blackwater, which ultimately drains to the River Thames. Neither of these rivers are European sites.

3.24 Research carried out by the Environment Agency has indicated that future sewage treatment capacity at Guildford sewage treatment works can be rendered adequate to deal with projected growth, at least to 2026 given relatively small capital cost<sup>20</sup> and will therefore not have an adverse

<sup>20</sup> Environment Agency. May 2006. Creating a Better Place: Planning for Water Quality and Growth in the South East.

effect upon receiving waters. Additionally, Guildford Council commissioned a bespoke Water Quality Assessment to support the development of the Local Plan<sup>21</sup>. Stage 2 of the assessment (October 2017) concluded that feasible solutions were possible to ensure environmental conditions and legislative objectives are met relating to water quality.

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<sup>21</sup> Water Quality Assessment <https://www.guildford.gov.uk/newlocalplan/infrastructureanddelivery>

## 4. Test of Likely Significant Effects

- 4.1 The Guildford Local Plan Part 2: Development Management Policies Issues and Preferred Options Consultation Document has been subjected to HRA screening for likely significant effects both alone and in combination. Each issue and preferred option has been considered. The purpose of the likely significant effects screening is to determine whether any of the preferred options could result in a likely significant effect on any European designated sites in view of those sites conservation objectives either alone or in combination with other plans and projects.

**Table 2. Likely Significant Effects of the Policies within the Guildford Local Plan Development Management Policies for Effects on Thames Basin Heaths SPA**

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy H4: Housing density	<p>The aim of this policy is to enable appropriate residential densities in high quality design-led schemes by having a policy that requires:</p> <ol style="list-style-type: none"> <li>1) Maximising the optimal use of land by building homes at the most appropriate density taking into account:                             <ol style="list-style-type: none"> <li>a) the site size, characteristics and location,</li> <li>b) the urban grain of the area and appropriate building forms and sizes for the site, and</li> <li>c) the context and local character of the area.</li> </ol> </li> <li>2) Higher density development in the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges, unless there are strong reasons why it would be inappropriate.</li> </ol>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy regarding residential densities. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>
Policy H5: Housing extensions and alterations	<p>The aim of this policy is to achieve high-quality design for extensions and alterations by having a policy that addresses the following issues:</p> <ol style="list-style-type: none"> <li>1) Requiring residential extension and alteration schemes to have regard to the impact on the streetscene, neighbours and the existing property such that they:                             <ol style="list-style-type: none"> <li>a) respect the existing context, scale and character of the adjacent buildings and immediate surrounding area,</li> <li>b) have no unacceptable impact on the amenities enjoyed by the occupants of adjacent buildings in terms of privacy and access to sunlight and daylight, and</li> <li>c) are consistent with the form, scale, character and proportion of the existing building.</li> </ol> </li> </ol> <p><b>Basement extensions</b></p> <ol style="list-style-type: none"> <li>2) Proposals for basement extensions are required to:                             <ol style="list-style-type: none"> <li>a) be well-designed, proportionate and ensure that their potential impact on the local environment, trees, tree roots, garden area, architectural character of the property, neighbouring properties and residential amenity is acceptable, and</li> <li>b) have no adverse impact on local ground water conditions, flooding or drainage issues.</li> </ol> <p>Applications involving the formation of a basement are expected to include a structural impact report and this will be a requirement for the Local Validation List. The report should show that there is no adverse impact to land and the structural stability of the application site and adjacent properties.</p> </li> </ol> <p><b>Annexes</b></p> <ol style="list-style-type: none"> <li>3) Development of a residential annex will be permitted if:                             <ol style="list-style-type: none"> <li>a) it is an extension that would be subordinate in scale to the main residence,</li> <li>b) it is fully integrated into the main dwelling house unless it is an outbuilding,</li> </ol> </li> </ol>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy setting out the criteria by which extensions will be deemed acceptable. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>c) it clearly and unequivocally shares either bathroom or kitchen facilities with the main dwelling house,</li> <li>d) it cannot be used as a self-contained dwelling, and</li> <li>e) it would share the vehicular access and garden area.</li> </ul> <p>All residential extensions are expected to have regard to the Guildford Borough Council Residential Extensions and Alterations SPD 2018 or any document which replaces it.</p>	
<p>Policy H6: Housing conversion and sub-division</p>	<p>The aim of this policy is to achieve high-quality conversions and sub-divisions by having a policy that addresses the following issues:</p> <p><b>Subdivisions and conversions</b></p> <ul style="list-style-type: none"> <li>1) Development involving the conversion of dwellings into flats, studios or bedsits will be supported provided that: <ul style="list-style-type: none"> <li>a) the balance of housing types and character of the immediate locality would not be adversely affected; and</li> <li>b) there is sufficient amenity space available; and</li> <li>c) it would not be detrimental to the amenity of neighbouring residents.</li> </ul> </li> </ul>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy setting out criteria for allowing conversions and sub-divisions. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>
<p>Policy E10: Rural development (including agricultural diversification)</p>	<p>The preferred option is to support the development of the rural economy by means of a policy that clarifies the types of new buildings or changes of use of buildings and land that the Council would consider acceptable in principle, subject to any proposal falling within the exceptions listed in paragraph 145 (a) to (g) of the NPPF for sites in the Green Belt, or meeting the requirement of policy P3 (1) of the Local Plan: Strategy and Sites<sup>22</sup> for non-Green Belt sites.</p> <p><b>Green Belt</b></p> <p>Within the Green Belt, the policy might support the following proposed forms of rural development, provided that any proposal falls within the exceptions listed in paragraphs 145 and 146 of the NPPF:</p> <ul style="list-style-type: none"> <li>1) New appropriate facilities for small-scale outdoor sport or outdoor recreation, such as a sports pavilion or clubhouse, or a small-scale building within a farm holding to accommodate outdoor recreational facilities such as an animal petting area.</li> <li>2) Conversion of vacant or redundant agricultural buildings to small-scale business, or recreational uses.</li> </ul> <p><b>Countryside</b></p> <p>Within the area of countryside, as designated on the Policies Map, the policy could support development of the following new uses in principle, provided they respect the area's local character:</p>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy which sets out conditions for rural development. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways.</p>

<sup>22</sup> To accord with LPSS policy P3 (1) they would need to require or justify a countryside/rural location, be in proportion to the site's scale and setting and not increase physical or visual coalescence between the existing urban area and villages around Ash and Tongham.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>1) Farm shops (provided they support the farm’s agricultural operations and are operated as part of the farm holding)</p> <p>2) Other farm diversification proposals, for example activity centres and arts and craft shops</p> <p>3) Tourist accommodation</p> <p>4) Small-scale rural tourism attractions</p> <p>5) Small-scale leisure facilities</p> <p>6) Horticultural nurseries and other small-scale business enterprises</p> <p>New buildings in the countryside should be clustered together where possible to reduce their visual impact on the character of the countryside and any built features should avoid harm to the local environment or residential amenity (particularly through noise).</p> <p><b>Non-agricultural uses within farm holdings</b></p> <p>New buildings, or proposed changes of use of existing buildings, within a farm holding that are to be used for non-agricultural uses will be required to be operated as part of the farm holding and support the farm’s agricultural operation.</p> <p>The Council will require adequate space to be made available within the curtilage of any building within a farm holding proposed for a farm shop or other non-agricultural use to allow for staff and visitor parking without detriment to the visual amenity of the countryside.</p> <p>If permission is granted for a farm shop, the Council may apply conditions to limit the overall scale of the development and require that any goods for sale that are not produced locally remain ancillary to the sale of local produce.</p> <p>*See Definitions.</p>	
<p>Policy E11: Horse related development</p>	<p>To have a policy that supports small-scale horse or other equine-related development if:</p> <p>1) adequate land is available for the proper care of the animals, including stabling, grazing and exercise, having regard to the latest Government-published standards; and</p> <p>2) the applicant demonstrates that the proposed development would:</p> <p>a) have no adverse effect on the nature conservation or biodiversity value of the site;</p> <p>b) re-use existing buildings where feasible, or, in the case of a new facility, be satisfactorily integrated with existing buildings;</p> <p>c) be acceptable in terms of impact on landscape character.</p> <p>d) not have a significant detrimental effect on the amenity of neighbouring or nearby properties by reason of noise, smell, overlooking, or other general disturbance</p> <p>Particular consideration will be given to the cumulative adverse effects of proposals in the vicinity of the proposed site and the wider area.</p> <p><b>Larger-scale developments</b></p>	<p>No Likely Significant Effect</p> <p>This policy is a design/development management policy does not provide for a quantum of development. All horse-related development would be subject to the provisions of Policy P5 in adopted LPP1 which states that ‘<i>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 Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development</i>’.</p> <p>It is recommended a slight wording alteration to the policy to provide clarity that all European sites should be protected. E.g. wording should be changed to “have no adverse effect</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>3) Proposals for larger-scale equine-related development will be expected to meet the criteria above. In addition, for developments likely to attract large numbers of visitors, a transport assessment will be required to be undertaken to show that there will be no unacceptable impacts on highway safety and that the safety of horses, riders and other road users will not be compromised.</p>	<p>on nature conservation or biodiversity value” without “of the site”.</p> <p>No linking impact pathways.</p>
<p>Policy P6: Biodiversity in new developments</p>	<p>The aim of this policy is to maximise biodiversity gains in all new developments, (including those exempt from biodiversity net gains - see policy P7), by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Requires new developments to prioritise biodiversity in their proposals as a general principle.</li> <li>2) Requires developments within or adjacent to a BOA to support the achievement of the objectives of the BOA as set out in the relevant BOA Policy Statement<sup>23</sup> and requires them to protect the designated and priority habitats and species in the BOA and improve habitat connectivity across the BOA.</li> <li>3) Expects proposals to be guided by other national, regional and local biodiversity strategies. The Green and Blue Infrastructure SPD will signpost and map the relevant strategies to help inform planning proposals.</li> </ol> <p><b>Planting schemes and landscaping</b></p> <ol style="list-style-type: none"> <li>4) Requires proposals to maximise biodiversity gain in planting and landscaping schemes by choosing species, habitats and management regimes that provide best biodiversity benefit as set out in BOA policy statements and other strategies.</li> <li>5) Tree canopies are expected to be retained and new tree planting is expected to focus on the creation of new connected tree canopies or the extension of existing canopies. Tree planting schemes should provide resilience in terms of climate, disease and ageing, planting large species with long lifespans where opportunities arise. It is expected that UK sourced native species will be used, unless imported strains would offer greater resilience.</li> </ol> <p><b>Measures on building structures</b></p> <ol style="list-style-type: none"> <li>6) Requires schemes to include features in or on building structures that support wildlife wherever possible, including integrated nesting boxes and green roofs and walls that will last for the lifetime of the development and cater for appropriate species and habitats.</li> </ol> <p><b>Site design</b></p> <ol style="list-style-type: none"> <li>7) Expects schemes to take opportunities to create new areas of habitat and provide appropriate links between existing habitats, avoiding and reversing fragmentation and species isolation. Built features are expected to be permeable for wildlife. Where invasive species are present, site design should not facilitate their spread.</li> <li>8) Expects major schemes to include measures that encourage a sense of community ownership of green spaces.</li> </ol>	<p>No Likely Significant Effect</p> <p>This policy is a positive design/development management policy, providing for greater biodiversity in new developments. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

<sup>23</sup> SyNP (2019) Biodiversity Working Group. [Online]. Available online at <https://surreynaturepartnership.org.uk/our-work/>.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p><b>Sites that include or are adjacent to sensitive habitats</b></p> <p>9) Where sites contain or are adjacent to sensitive habitats, appropriate buffers and, where necessary, barriers should be incorporated in order to protect the habitats from the impacts of the development, including those resulting from recreational use. Schemes should be designed to avoid light pollution. If a lighting strategy is provided, it should take account of the potential impacts on wildlife.</p> <p>10) Development that contains or is adjacent to a watercourse should retain or provide an appropriate buffer between built development (including parking areas, private gardens and landscaping) and the watercourse, composed of natural or semi-natural habitat.</p>	
<p>Policy P7: Biodiversity net gain</p>	<p>The aim is to provide clarity and detail for the requirement for developments to aim to achieve biodiversity net gain set out in policy ID4 through a policy that:</p> <ol style="list-style-type: none"> <li>1) Clarifies that net gain means a minimum gain of 20 per cent. Major developments are required to follow Defra's net gain calculation methodology 'Defra Biodiversity Metric 2.0' and submit a completed spreadsheet with the planning application. Minor developments are required to follow the simplified version of the metric.</li> <li>2) Clarifies that biodiversity net gain is required on all sites except previously developed sites, unless the previously developed sites support at least one protected or priority species population or habitat, or an assemblage of species with an otherwise demonstrably high biodiversity value<sup>24</sup>.</li> <li>3) Clarifies that proposals for net gain should be delivered in a manner that is consistent with policies P6 and ID4 so that measures are focused on local priorities and will provide best value.</li> <li>4) Ensures development follows the mitigation hierarchy by: <ol style="list-style-type: none"> <li>a) Avoiding impacts on biodiversity as far as possible.</li> <li>b) Where an impact cannot be avoided, the impact is minimised as far as possible.</li> <li>c) Where habitats are adversely impacted, they are restored or rehabilitated.</li> <li>d) Where impacted habitats cannot be wholly restored or rehabilitated, compensation measures are used, including off-site provision in the locality of the development line with the emerging national approach.</li> </ol> </li> <li>5) Requires new habitats delivered under biodiversity net gains to be secured and maintained for at least 30 years.</li> <li>6) Where the applicant is unable to provide the gains on-site or off-site, the Council will seek a financial contribution to fund habitat measures if suitable land is available.</li> <li>7) Supports applications for change of use in order to create biodiversity sites in appropriate locations, including biodiversity offsetting sites and sites within Local Nature Recovery Strategies.</li> </ol>	<p>No Likely Significant Effect</p> <p>This policy is a positive design/development management policy, providing for greater inclusion of biodiversity net gain. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

<sup>24</sup> For example, identified through Natural England's Species Status project. See <http://publications.naturalengland.org.uk/category/4707656804597760> and <http://archive.jncc.gov.uk/default.aspx?page=3352>.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy P8: Woodland, trees, hedgerows and irreplaceable habitats	<p>The aim of this policy is to protect important woodlands, trees, hedgerows and irreplaceable habitats by having a policy that includes the following measures:</p> <ol style="list-style-type: none"> <li>1) Habitats will be considered to be irreplaceable where they meet the definition in the NPPF glossary or are identified as such in documents published by the Surrey Nature Partnership. They include, but are not limited to, the following habitats:               <ol style="list-style-type: none"> <li>a) ancient woodland,</li> <li>b) ancient or veteran trees,</li> <li>c) ancient wood pasture and historic parkland (including the open space between trees),</li> <li>d) unimproved grassland,</li> <li>e) wet heathland and bogs, and</li> <li>f) important hedgerows<sup>25</sup> and ancient hedgerows.</li> </ol> </li> <li>2) Irreplaceable habitats will be protected. Development resulting in the loss, damage or deterioration of irreplaceable habitats, including those listed in paragraph 1, will be refused, unless there are wholly exceptional reasons and the exceptional benefits of the development proposal outweigh the loss of the habitats, demonstrated through unequivocal and credible evidence. Compensation will not form part of this assessment. However, a suitable compensation strategy that delivers appropriate levels of biodiversity gains will be required if irreplaceable habitats are harmed or lost.</li> <li>3) Planning proposals should set out clearly any likely impacts on irreplaceable habitats and, where necessary, appropriate and proportionate (in terms of quality and quantity to address the level of harm predicted) compensation.</li> <li>4) Where ancient woodland falls within or adjacent to a development site, the following measures are required:               <ol style="list-style-type: none"> <li>a) The application should be accompanied by information setting out the location of all significant ancient or veteran trees (a BS5837 Survey).</li> <li>b) An appropriate buffer around the ancient woodland of a minimum of 15 metres.</li> <li>c) There should be a clear separation between the woodland and the rest of the development, delineated by a physical feature such as a cycle lane, path or road.</li> </ol> </li> <li>5) Site design is expected to incorporate significant trees plus their root structures and understory within the public realm (including ancient and veteran trees and ancient woodland),</li> </ol>	<p>No Likely Significant Effect</p> <p>This policy is a positive design/development management policy, protecting irreplaceable habitats such as ancient woodland. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
Policy P9: Priority species and habitats on undesignated sites	<p>The aim of this policy is to protect species and habitats that are not covered by Policy ID4 (which protects designated sites) by having a policy that:</p>	<p>No Likely Significant Effect</p> <p>This policy is a positive design/development management policy, protecting priority species and habitats on</p>

<sup>25</sup> Defined under the Hedgerows Regulations 1997.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>1) Requires proposals for development on or adjacent to sites where there is a priority species or habitat to preserve and enhance the relevant ecological features. Priority species and habitats include:</p> <ul style="list-style-type: none"> <li>a) species and habitats protected by law,</li> <li>b) priority habitats and species identified in strategies produced by the Surrey Nature Partnership and Natural England,</li> <li>c) habitats sites, wildlife corridors and stepping stones identified by the Surrey Nature Partnership and in Development Plan Documents and SPDs, by Natural England and in the NPPF, and</li> <li>d) sites identified as compensatory habitat sites on the habitat register.</li> </ul> <p>2) The mitigation hierarchy should be applied, with avoidance of harm prioritised as the first step, followed by minimisation of harm, restoration and finally compensation as a last resort.</p>	<p>undesigned land. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
<p>Policy P10: Contaminated Land</p>	<p>The aims of this policy could be secured by having a policy that:</p> <p>1) Supports the development of land that is known or suspected to be contaminated, including land which is suspected to be affected by contamination from adjacent land, but requires that:</p> <ul style="list-style-type: none"> <li>a) the full nature and extent of contamination is established through suitable assessments; clarifying that site investigations, risk assessment, remediation and associated works are to be carried out to industry best practice guidelines at the time of application<sup>26</sup>,</li> <li>b) where evidence of contamination exists, the land is made fit for its intended purpose and avoids unacceptable harm to sensitive receptors through remediation and the design and layout of the development, avoiding creating or maintaining linkages between sources of contamination and sensitive receptors,</li> <li>c) appropriate remedial measures are included to prevent risk to future users of the site, the surrounding area and the environment (including water supplies and aquifers),</li> <li>d) prior to either occupation or use, a 'Verification Report' is submitted to the Council that demonstrates the agreed remediation measures have been implemented effectively.</li> </ul>	<p>No Likely Significant Effect</p> <p>This is a design/development management policy setting out remediation requirements for contaminated land. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
<p>Policy P11: Air quality and air quality management areas</p>	<p>The aim of this policy is to reduce exposure to poor air quality across the borough and improve levels of air pollutants in Air Quality Management Areas (AQMA) and surrounds by having a policy that:</p> <p>1) Will only permit development where it will not give rise to adverse impacts on health and quality of life from air pollution. In particular, development proposals within or adjacent to an Air Quality Management Area (AQMA) will be expected to be designed to mitigate the impact of poor air quality on future occupiers.</p>	<p>No Likely Significant Effect</p> <p>This is a positive design/development management policy regarding air quality improvement and management. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

<sup>26</sup> These assessments should be submitted with the Planning Application.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>2) Will require an air quality assessment for development proposals that have the potential for significant air quality impacts, including those which:</p> <ul style="list-style-type: none"> <li>a) are classed as major development and have the potential, either individually or cumulatively, for significant emissions; or</li> <li>b) are likely to result in an increase in pollution levels in an Air Quality Management Area (AQMA); or</li> <li>c) introduce biomass technology (i.e. applications for biomass burners that require planning permission and are not 'permitted development'); or</li> <li>d) introduce new sensitive receptors into AQMAs and are likely to expose people to existing sources of air pollutants.</li> </ul> <p>3) Requires that, where an air quality assessment identifies an unacceptable impact on or from air quality, an emissions mitigation assessment and cost calculation will be required.</p> <p>4) Requires applicants to demonstrate that appropriate mitigation will be provided to ensure that the new development is appropriate for its location and unacceptable risks are avoided.</p> <p>5) Will support the deployment of biomass technology (high quality and low emission plant) in locations off the gas grid where coal and oil-fired plant are currently used and where no cleaner or greener feasible alternative is available.</p> <p>6) Will not support the deployment of biomass technology in new development in the AQMAs.</p> <p>7) Will require development to demonstrate conformity with the Institute of Air Quality's guidance 'Land-Use Planning and Development Control: Planning for Air Quality' (2017)<sup>27</sup>.</p>	
<p>Policy P12: Water resources and water quality</p>	<p>The aim of this policy is to ensure that new development does not cause an unacceptable risk to surface or groundwater resources by having a policy that:</p> <ul style="list-style-type: none"> <li>1) Opportunities to improve water quality are used wherever possible. Proposals that are likely to have an impact on water resources will be required to demonstrate that the proposal will not cause unacceptable deterioration to water quality or have an unacceptable impact on: <ul style="list-style-type: none"> <li>a) the flow or quantity of groundwater; and</li> <li>b) the quality of surface or groundwater resources.</li> </ul> </li> <li>2) Supports the development or expansion of infrastructure associated with water supply, surface water drainage and wastewater treatment facilities where proposals are consistent with other relevant development plan policies such as flood risk, contamination and protection of the natural and built environment.</li> <li>3) Requires new development that is likely to have an impact on underground or surface water bodies covered by the Water Framework Directive and the South East River Basin Management Plan to contribute towards those water bodies maintaining or achieving 'Good Ecological Status'. This may take the form of on-site measures wherever possible, or a financial contribution to off-site measures.</li> </ul>	<p>No Likely Significant Effect</p> <p>This is a design/development management policy to protect surface and groundwater resources. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways</p>

<sup>27</sup> Available online at: <http://www.iagm.co.uk/text/guidance/air-quality-planning-guidance.pdf>.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy P13: Sustainable drainage systems	<p>The aims of this policy could be secured by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Requires that proposals for major development<sup>28</sup>, incorporate Sustainable Drainage Systems (SuDS) where required by the lead local flood authority.</li> <li>2) Requires development proposals to demonstrate that SuDS have been included from the early stages of site design in order to incorporate appropriate SuDS within the development. SuDs schemes will be required to satisfy technical standards and design requirements in accordance with Defra’s technical standards for sustainable drainage systems<sup>29</sup>.</li> </ol>	<p>No Likely Significant Effect</p> <p>This is a design/development management policy to ensure sustainable drainage. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy P14: Regionally important geological/geomorphological sites	<p>The aims of this policy could be secured by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Requires that development proposals that are likely to materially harm the conservation interests of Regionally Important Geological/Geomorphological Sites must demonstrate that the need for the development clearly outweighs the impact on biodiversity.</li> <li>2) Ensures that where this test is met, every effort is made by the applicant to reduce harm to the conservation interests of the Regionally Important Geological/Geomorphological Site through avoidance and mitigation measures. The applicant must demonstrate that any necessary avoidance and mitigation measures will be implemented and maintained effectively.</li> </ol>	<p>No Likely Significant Effect</p> <p>This is design/development management policy which protects regionally important geological sites. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy D4: Achieving high quality design and local distinctiveness	<p>The aim of this policy is to enable the following:</p> <ul style="list-style-type: none"> <li>• Delivering high quality design across the Borough</li> <li>• Protecting the character and local distinctiveness of the Borough</li> <li>• Achieving new developments that contribute to and enhance existing character and create distinctive new environments</li> </ul> <p>By having a policy as follows:</p> <p><b>Design Standards</b></p> <p>General Principles:</p> <ol style="list-style-type: none"> <li>1) All development must have regard to the National Design Guide 2019 and all future updates, SPD's and other related guidance.</li> <li>2) All new development must demonstrate high quality of design which demonstrates a clear understanding of the local area, its character, landscape and views, significance and features of interest.</li> <li>3) Sites should consider the opportunity to create site specific identities.</li> </ol>	<p>No Likely Significant Effect</p> <p>This is a design/development management policy for achieving high quality design and ensuring local distinctiveness is maintained. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

<sup>28</sup> The definition of major development includes residential development of 10 dwellings or more (gross) and non-residential development of 1,000 sqm gross new floorspace or more.

<sup>29</sup> Defra (2015) Sustainable Drainage Systems: technical standards for sustainable drainage systems. Available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/415773/sustainable-drainage-technical-standards.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf).

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>4) To avoid piecemeal development, where allocated sites are in separate ownerships, the Council seeks comprehensive and integrated design to ensure the best use of land and well connected development.</p> <p>5) Development designs should show how they respect and respond to the history of a place, its surrounding context, and how they will make a positive contribution to prevailing character, and create design led new identities with regard to:</p> <ul style="list-style-type: none"> <li>a) layout, plot sizes, building patterns and rhythms, lines and proportions,</li> <li>b) form, scale and massing,</li> <li>c) building heights,</li> <li>d) urban grain and the pattern of routes, connections and spaces locally and more widely,</li> <li>e) materials,</li> <li>f) landscape – need to provide a high standard of design and materials throughout and includes means of enclosure, paving and planting, and</li> <li>g) topography and views.</li> </ul> <p>6) New development will also be expected to:</p> <ul style="list-style-type: none"> <li>a) be inclusive, integrated and accessible for all occupants now and in the future,</li> <li>b) promote health with opportunities for recreation, leisure and social interaction, and</li> <li>c) promote safer streets and public areas and pedestrian friendly spaces.</li> </ul> <p><b>Character of development</b></p> <p>7) The Council’s objective is to ensure that all new development secures high quality design through a policy that will require that:</p> <ul style="list-style-type: none"> <li>a) new development respects local character and context including established street patterns, urban grain, building lines and topography.</li> <li>b) development proposals should respect, preserve and enhance local character and the surrounding environment through appropriate scale, height, massing, form, proportions and roof forms.</li> <li>c) layouts create an identifiable character that is connected to surrounding area and easily understood by users.</li> <li>d) high quality materials and detailing will be required in new built forms that reflect and reinforce local identity and sustain distinctive character; including architectural styles and detailing. Traditional natural materials will be supported to provide regional identity and character. High quality modern materials will be supported where they are sustainable, durable and long lasting, and they provide new or complementary identities and distinctiveness that contribute to and enhance local character.</li> <li>e) new development will be required to respond to the Guildford Town Centre Views SPD.</li> <li>f) new development creates lively, active frontages, visual interest and a sense of identity to the public realm and at pedestrian level.</li> </ul>	

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy D5: Privacy and Amenity	<p>The aim of this policy is to seek to protect the quality of life of all occupiers and neighbours. This will be achieved by supporting proposals that:</p> <ol style="list-style-type: none"> <li>1) protect privacy and amenity of communities, all occupiers and neighbours,</li> <li>2) ensure developments maximise opportunities for provision of private outdoor amenity space, and</li> <li>3) provide lighting schemes that achieve their purpose without adverse glare, light spillage on close and longer views, or adversely effecting amenity of occupiers.</li> </ol> <p>The factors that will be considered to ensure that privacy and amenity are addressed include:</p> <ol style="list-style-type: none"> <li>1) visual privacy, outlook, sun light, daylight and overshadowing, artificial lighting levels,</li> <li>2) noise and vibration,</li> <li>3) odour, fumes and dust,</li> <li>4) bin and bike storage, and</li> <li>5) provision and access to electric vehicle charging points.</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy to ensure existing and new residents retain privacy and amenity. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy D6: Shopfront design	<p>The design of new or altered shopfronts can have a significant impact on the appearance, character and vitality of an area. Where new shopfronts are proposed or existing are to be altered the Council will seek to ensure that:</p> <ol style="list-style-type: none"> <li>1) shopfronts are well designed and should have proportioned, and interesting facades, with displays and interiors open to view to provide visual interest,</li> <li>2) security measures are permeable to allow views through. Blank facades, solid grilles and roller shutters creating dead frontages will not be supported, and</li> <li>3) shopfronts allow for easy access for all.</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy regarding appropriate shop front design. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy D7: Advertisements, hanging signs, and illumination	<p>Proposals for advertisements will need to comply with the following:</p> <ol style="list-style-type: none"> <li>1) new advertisement and signage on or within the curtilage of a listed building must demonstrate that it would not result in adverse harm to the integrity of the building's design, historical character, structure or setting.</li> <li>2) The scale, colour, materials and detailing must be sympathetic to the character of the listed building, and must not detract from or conceal any features of significance. Projecting hanging signs will be resisted in the historic cobbled section of the High Street where it would adversely impact on heritage assets and their setting;</li> <li>3) within a Conservation Area new advertisement and signage will be permitted where it can be demonstrated that it would not result in adverse harm to the integrity of the building's structure and design, historical character and setting. Signage should be sensitive to the character of the area, visually unobtrusive, well designed, well located and should not create access issues. The quantity of advertisement is to be kept to the minimum necessary to identify the building and its function;</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy with regards to signage and ensuring building design and character are retained. It does not provide for a quantum of development or identify any locations for development.</p> <p>No linking impact pathways</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>4) there will be a presumption against proposals for internally and/or externally illuminated fascia and hanging signs unless it can be demonstrated that the premises rely principally on trading after dark. Illumination of shop front fascia's and signs will be resisted in the historic setted section of Guildford High Street;</li> <li>5) be of high-quality design, sensitive to the visual appearance of the building, the surrounding street scene, and views, and having regard to the significance of designated heritage assets and their setting,</li> <li>6) be appropriate to and relevant to the business or premises on which it relates,</li> <li>7) it does not contribute to unsightly proliferation or clutter of signage in the vicinity,</li> <li>8) it does not create a hazard to pedestrians or road users, and</li> <li>9) it does not cause visual intrusion through light pollution.</li> </ul>	
<p>Policy D8: Public realm</p>	<p><b>General principles</b>                      The Council's objectives will require new public realm projects to:</p> <ul style="list-style-type: none"> <li>1) be informed by their context including the area's distinctive qualities, identity, topography and opportunities of the relevant places within the Borough;</li> <li>2) be of high quality in terms of design and materials used, sustainable, robust and user friendly for all, and create varied and attractive environments and spaces where people want to be, and to contribute to;</li> <li>3) enhance connectivity for pedestrians and cycle movement;</li> <li>4) provide views and focal points to enable ease of access and legibility to places people wish to visit;</li> <li>5) provide opportunity for flexible multi-use community spaces;</li> <li>6) provide opportunity for charging points;</li> <li>7) be appropriately maintained for the long term, and;</li> <li>8) provide opportunity for on street dining where it relates to the business use, comprises of moveable furniture, and does not obstruct pedestrian routes.</li> </ul> <p><b>Public Art</b>                      Public art can contribute considerably to the quality of the environment when it is well considered, designed and appropriate. The Council will only permit development for an artwork, statue or memorial where a proposal has been:</p> <ul style="list-style-type: none"> <li>1) considered and assessed against the Council's Art Strategy;</li> <li>2) 10) responds appropriately to its context, contributes to community engagement and ownership and where the future care and maintenance are secured.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy regarding the design of the public realm. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
<p>Policy D9: Residential intensification</p>	<p>The aim of this policy is to identify design principles that will apply to residential intensification schemes, with further specific points for villages inset from the Green Belt:</p>	<p>No Likely Significant Effects</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>1) Residential intensification within the borough should follow good design principles set out in the National Design Guide, elsewhere in this Plan and as appropriate within Neighbourhood Plans. Additionally, the policy will require that schemes:</p> <ul style="list-style-type: none"> <li>a) Make the best use of land,</li> <li>b) Establish or enhance a sense of place, avoiding isolated and piecemeal development and using innovative design approach where appropriate,</li> <li>c) Proposals involving 'back-land' development must avoid long, narrow and isolated access points, such developments should create a positive 'street' entrance establishing a sense of identity and encouraging pedestrian and cycle traffic into and out of the site,</li> <li>d) Schemes should demonstrate that relationships with both existing neighbouring development and buildings/gardens within the site are acceptable taking into account back to back or back to front distances are appropriate. The privacy of existing and proposed residential areas should also be respected by any new layout,</li> <li>e) To ensure proposals come forward in an integrated manner designs should ensure landscaping measures, parking, refuse storage and collection facilities are all planned at the outset and relate well to the buildings within the site,</li> <li>f) Where the Council considers that land has come forward which could be incorporated into a more comprehensive scheme it will require appropriate infrastructure contributions from individual proposals which may be lower than the normal thresholds. Contributions will be based on a level of development across the comprehensive area which the Council considers appropriate,</li> </ul> <p>1) Additionally, within villages areas now inset from the Green Belt, proposals should:</p> <ul style="list-style-type: none"> <li>a) Respect the surrounding grain of development</li> <li>b) Introduce development forms which reflect the character and context of the village</li> <li>c) Avoid layouts that are overly formalised where surrounding village patterns are organically driven</li> <li>d) Ensure that the transitional character of edge of village/settlement areas is not lost and that hard urban forms are not introduced in semi-rural environments</li> <li>e) Encourage pedestrian/cycle links to key village facilities</li> </ul>	<p>This is a design/development management policy with regards to ensuring intensification of residential development follows good design principles. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
<p>Policy D10: 'Agent of Change' and noise impacts</p>	<p>The aims of this policy could be secured by having a policy that:</p> <p>Supports the development of 'noise-sensitive' and 'noise-generating' uses where proposals accord with the NPPF, but requires that:</p> <ul style="list-style-type: none"> <li>1) planning applications for the development of noise-sensitive uses should consider their proximity to noise-generating uses. Applications for noise-generating uses should also consider their proximity to noise-sensitive</li> <li>2) uses. Where appropriate, applications should include a Noise Impact Assessment, which considers this relationship and the impact of any potential noise impacts either on or from</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy ensuring development considers noise sensitive areas etc. It does not provide for a quantum of development or identify any locations for development</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>the proposed development<sup>30</sup>. Applicants must clearly identify the likely effect levels from, or on, existing uses nearby to the proposed development as a result of the proposal, including the potential adverse effect that they may have on the new and existing residents or users.</p> <p>3) where evidence of potential Adverse Noise Effect Level impact exists<sup>31</sup>, the applicant must demonstrate how the proposed development will be designed and implemented in order to;</p> <p>f) Prevent any present and very disruptive Significant Observed Adverse Effect levels,</p> <p>g) Avoid any present and disruptive Significant Observed Adverse Effects, and mitigate effectively any present and intrusive Lowest Observed Adverse Effect levels. if the application site cannot be designed and implemented to fully prevent, avoid and mitigate potential Adverse Noise Effect impacts</p> <p>h) as appropriate, the applicant should explore whether the existing development has potential to be adapted without adversely affecting the existing operation.</p> <p>4) applicants must demonstrate how the proposal has been designed and will be implemented in accordance with good acoustic design principles both externally and internally<sup>32</sup>, demonstrating that they have avoided creating or maintaining pathways of impact between sources of sound nuisance and sensitive receptors.</p> <p>5) as the 'agent of change', the applicant is responsible for ensuring the likely adverse noise effects are identified and all relevant appropriate measures to manage the effects are implemented. This includes any measures required to be undertaken to the noise-generating use as a result of proposals for noise-sensitive uses, where necessary.</p> <p>6) where there is likely to be an unacceptable impact on either proposed or existing noise-sensitive uses, which cannot be prevented or adequately mitigated, planning permission is likely to be refused.</p> <p><b>Noise-sensitive uses</b></p> <p>7) noise-sensitive development should be designed to ensure that noise-generating venues and uses remain viable without unreasonable restrictions being placed on them. proposals should be designed to reduce the impact of noise from adjoining activities or the local environment; incorporating appropriate noise barriers and optimising the sound insulation provided by the building envelope.</p> <p>8) proposals should ensure that any potential noise impacts are mitigated wherever possible, using measures such as those provided in Planning Practice Guidance<sup>33</sup>, including by</p>	<p>No linking impact pathways</p>

<sup>30</sup> Noise Impact Assessments should be produced by an independent, suitably qualified individual, tailored for local circumstances, and carried out to industry best practice guidelines at the time of the application.

<sup>31</sup> As defined within the Noise exposure hierarchy table, available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/820957/noise\\_exposure\\_hierarchy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/820957/noise_exposure_hierarchy.pdf)

<sup>32</sup> Section 5 of BS 8223:2014 provides guidance on how best to achieve this.

<sup>33</sup> See PPG Paragraph 011 Reference ID: 30-011-20190722.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>providing relatively quiet amenity areas or facades (containing windows to habitable rooms) as part of each dwelling.</p> <p><b>Noise-generating uses</b></p> <p>9) new noise-generating development (such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues) proposed close to residential and other noise-sensitive development should put in place measures such as soundproofing to mitigate and manage any noise impacts for neighbouring residents and businesses.</p> <p>10) 10) particular consideration should be given to the potential effects of noisy development on international, national and locally designated sites of importance for biodiversity.</p>	
<p>Policy D11: Corridor of the River Wey and Guildford and Godalming navigation</p>	<p>The Council's objective is to protect or enhance the special character of the River Wey and the Guildford and Godalming Navigations, especially their visual quality, setting, amenity, ecological value, architectural and historic interest, views within from the corridor, and the Nature Conservation value of the site. It will undertake this by having a policy that;</p> <ol style="list-style-type: none"> <li>1) seeks a high quality of design, both sensitive to and appropriate to, the context and function, and the special historic interest, of the river, its navigation and landscape. High quality design will be expected on all sides fronting, or in the vicinity of the river Wey, or affecting its setting,</li> <li>2) requires developments to seek to provide publicly accessible riverside walkways and/or cycle routes to enhance the vitality of the riverside,</li> <li>3) requires improvement of access to and from the river itself by foot, bicycle and/or boats,</li> <li>4) requires riverside developments to secure improvements to existing landscaping and provide new native planting schemes and that contribute to the biodiversity of the riparian environment, and</li> <li>5) ensures that sensitive levels of lighting are used to retain existing character and to protect amenity, natural habitats and night sky.</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy to protect the special character of the River Wey and Guildford and Godalming Navigations. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
<p>Policy D12: Sustainable and low impact development</p>	<p>The aim of this policy is to provide greater detail to supplement policy D2 where it supports sustainable and low impact development by having a policy that:</p> <p><b>Energy efficient development</b></p> <ol style="list-style-type: none"> <li>1) Introduces an explicit requirement for schemes to follow a low energy design and energy efficient fabric approach<sup>34</sup> to ensure that schemes maximise energy reductions before low carbon and renewable energy technology is considered, in line with the energy hierarchy.</li> </ol> <p><b>Embodied carbon</b></p>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy with regards to energy efficient development reducing impacts on the environment. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

<sup>34</sup> The 'fabric first' approach should be based upon a consideration of U-values, thermal bridging, air permeability, and thermal mass, and also features that affect lighting and solar gains, such as building orientation and layout.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>2) Requires schemes to demonstrate that choice of materials has taken account of the need to reduce embodied carbon emissions including by:</p> <ul style="list-style-type: none"> <li>a) sourcing materials locally where possible to reduce embodied emissions from transport, and</li> <li>b) taking into account the embodied carbon that results from the process of producing materials when choosing them, based on information provided in a respected material's rating database. This requirement does not apply where specific materials are needed for conservation or heritage reasons.</li> </ul> <p>3) Expects developments to consider the lifecycle of buildings and public spaces, including how they can be adapted and modified to meet changing social and economic needs and how materials can be reused or recycled at the end of their lifetime.</p> <p><b>Waste</b></p> <p>4) Requires development proposals with an estimated cost of £400,000 or above to be accompanied by a simple Site Waste Management Plan (SWMP) and £670,000 or above to be accompanied by a more detailed SWMP. The SWMP should follow established methodology; setting out how site waste will be managed during construction and that material reclamation, reuse and recycling has been prioritised. This provides additional detail for policy D2(1a &amp; 1b) which requires the efficient use and reuse of mineral resources and waste minimisation. The SWMP should be submitted within or alongside the sustainability statement/sustainability information that is required to be submitted under Policy D2.</p> <p><b>Water efficiency</b></p> <p>5) Expects all development proposals to incorporate measures to harvest and conserve water resources and, where possible, incorporate water recycling/reuse, building on policy D2 (d) which requires new dwellings to meet the highest national standard, currently the "optional requirement" described in Building Regulation 36 2(b)95.</p>	<p>No Likely Significant Effects</p>
<p>Policy D13: Climate change adaptation</p>	<p>The aim of this policy is to deliver climate change resilient development by providing further detail to support strategic Policy D2 (4) by having a policy that supports climate change adaptation and identifies the keys issues to be addressed. The policy would include the following measures:</p> <ul style="list-style-type: none"> <li>1) Buildings are required to be designed and constructed to provide for the comfort, health, and wellbeing of current and future occupiers over the lifetime of the development, covering the full range of expected climate impacts and with particular regard to overheating. Developments likely to accommodate vulnerable people, such as schools and care homes, should demonstrate that their specific vulnerabilities have been taken into account with a focus on overheating.</li> <li>2) Buildings are required to incorporate passive cooling measures and the exclusion of conventional air conditioning wherever possible in line with the cooling hierarchy.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy with regards to ensuring development can adapt to climate change. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>3) Schemes are required to minimise the urban heat island effect as far as possible including through:</p> <ul style="list-style-type: none"> <li>a) choice of materials,</li> <li>b) layout, landform, massing, orientation and landscaping,</li> <li>c) retention and incorporation of green and blue infrastructure</li> </ul> <p>4) Schemes are required to demonstrate adaptation for more frequent and severe rainfall events through measures including:</p> <ul style="list-style-type: none"> <li>d) retaining existing water bodies,</li> <li>e) incorporating new water features (including SuDS),</li> <li>f) designing planting and landscaping schemes to absorb and slow down surface water,</li> <li>g) ensuring SuDS comply with national and county guidance and advice<sup>35</sup>, and</li> <li>h) the use of permeable ground surfaces wherever possible.</li> </ul> <p>5) Schemes in areas of high risk of wildfire are designed to prevent the spread of fire, taking into account the risk to health and potential damage to significant habitats.</p>	
Policy D14: Climate change mitigation	To not propose a policy at this stage but to consider policy options once the outcome of the Future Homes consultation is known.	No policy to assess.
Policy D15: Large scale renewable and low carbon energy	<p>To allocate one or more sites for renewable and low carbon energy development in appropriate locations where visual and other impacts will be minimised and where energy potential is good.</p> <p>New large scale renewable and low carbon energy developments are required to set out in a management plan how biodiversity will be supported, maximising opportunities for biodiversity gain in line with good practice guidance.</p>	<p>No Likely Significant Effects</p> <p>At the moment this policy does not allocate any sites. In any event, any large scale renewable and low carbon energy proposal would be subject to the provisions of Policy P5 in adopted LPP1 which states that '<i>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 Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development</i>'.</p>
Policy D16: Designated heritage assets	<p>The Council's objective is to set out a positive strategy for the conservation and enhancement of all designated heritage assets by having a policy that addresses the following issues:</p> <p><b>Supporting Information</b></p> <ul style="list-style-type: none"> <li>1) Expects all proposals affecting designated heritage assets, including curtilage buildings and structures and their setting, to be supported by a Statement of Significance and Impact. The level of detail provided within the statement should be proportionate to the assets'</li> </ul>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to protect designated heritage assets. It does not provide for a quantum of development or identify any locations for development</p>

<sup>35</sup> Surrey County Council and national guidance can be found on the Surrey County Council website here: <https://www.surreycc.gov.uk/people-and-community/emergency-planning-and-communitysafety/flooding-advice/more-about-flooding/suds-planning-advice>.

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>importance and no more than is sufficient to facilitate an understanding of the potential impact. To accord with the requisite of validation it must:</p> <ol style="list-style-type: none"> <li>a) have consulted the relevant historic environment record;</li> <li>b) demonstrate a clear understanding of the asset's significance including all those parts affected by the proposals, and where applicable the contribution made by its setting;</li> <li>c) explain how the asset and its setting will be affected by the proposal, including how the proposal preserves or enhances the heritage asset or better reveals its significance;</li> <li>d) demonstrate what steps have been taken to mitigate any resultant harm;</li> <li>e) present a justification for the proposals that explains why any resultant harm is considered to be necessary or desirable; and</li> <li>f) identify what public benefits might arise from the proposals in cases where harm has been identified.</li> </ol> <p><b>Loss of Significance</b></p> <ol style="list-style-type: none"> <li>2) Proposals which result in harm to, or loss of, the significance of a designated heritage asset will be considered in line with the policies in the NPPF (specifically paragraphs 194 – 196). The level of public benefit associated with the preservation of heritage assets on the 'Heritage at Risk' register managed by Historic England may require special consideration in terms of the impact on the significance of the asset.</li> </ol> <p><b>Enabling Development</b></p> <ol style="list-style-type: none"> <li>1) Development proposals for enabling development that would otherwise conflict with other planning policies, but which would secure the future conservation of a heritage asset will be supported provided: <ol style="list-style-type: none"> <li>a) They meet all the tests set out in Historic England's Enabling Development Policy cited within the guidance document Enabling Development and the Conservation of Significant Places (or guidance superseding it), and</li> <li>b) It can be demonstrated that alternative solutions are inappropriate, and</li> <li>c) They are subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development.</li> </ol> </li> </ol>	<p>No linking impact pathways</p>
<p>Policy D17: Listed Buildings</p>	<p>The aim of this policy is to add more operational detail to the LPSS Policy D3 for development proposals affecting listed buildings, to ensure their continued protection, by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Requires that alterations, additions or other works, directly, indirectly or cumulatively affecting the special interest of a statutory listed or curtilage listed building and their settings to: <ol style="list-style-type: none"> <li>a) Sustain and enhance the architectural and historical significance and integrity;</li> <li>b) Be of an appropriate scale, form, height, massing and design which respects the host building and its setting;</li> <li>c) Retain the historic plan form and structural integrity of the building;</li> </ol> </li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to protect listed buildings. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>d) Have regard to the architectural and historic features forming part of the special interest of the building;</li> <li>e) Reinforce the intrinsic character of the building through the use of appropriate materials, details and building techniques;</li> <li>f) Not harm the special interest and significance of buildings or structures forming part of the curtilage of the heritage asset; and</li> <li>g) Respect the character and appearance of a park, garden or yard of historic or designated interest.</li> </ul> <p>2) Supports proposals involving a change of use of part or the whole of a listed building where details of all intended alterations to the building and its curtilage have been shown, and where:</p> <ul style="list-style-type: none"> <li>a) the proposed use would not be harmful to the special interest of the building;</li> <li>b) the building is capable of accommodating the proposed change of use without considerable alteration and consequent loss of special interest.</li> </ul> <p>3) Supports proposals that seek to adapt to, or mitigate the effects of, climate change that are sympathetic and conserve the special interest and significance of the heritage asset or its setting. Where conflict between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change should be weighed against any harm to the significance of heritage assets.</p>	
<p>Policy D18: Conservation areas</p>	<p>The Council’s objective is to add more operational detail to the LPSS Policy D3 for development proposals affecting development with conservation Areas, to ensure their continued protection, by having a policy that:</p> <ul style="list-style-type: none"> <li>1) Requires that any development within or which would affect the setting of a Conservation Area to preserve and enhance the character and local distinctiveness of the area. It must pay due regard to the Council’s Conservation Area Appraisal for the relevant area.</li> <li>2) Requires development within, affecting the setting of, or views into or out of a Conservation Area to preserve and enhance features that contribute positively towards the area’s character and appearance. Particular consideration will be given to the following: <ul style="list-style-type: none"> <li>a) The retention of buildings, groups of buildings, historic settlement patterns, plot widths, open spaces, historic building lines and ground surface;</li> <li>b) Retention of architectural details that contribute positively to the character or appearance of the area;</li> <li>c) The impact of the proposal on the skyline and landscape;</li> <li>d) The protection of trees that contribute positively towards the character and appearance of the area.</li> </ul> </li> <li>3) Requires proposals for all new development, and extensions and alterations to existing buildings to be of a high quality of design, which reinforces or compliments the character and local distinctiveness of the Conservation Area by having regard to:</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to protect conservation areas. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy D19: Scheduled monuments & registered parks and gardens	<p>a) the height, massing, scale, form, roofscape, plot width and spaces between buildings;</p> <p>b) the use of good quality sustainable building materials and detailing appropriate to the locality and sympathetic in colour, profile and texture.</p> <p>4) Seeks to retain attractive traditional materials, features and detailing such as original doors, windows, chimneys and boundary walls</p> <hr/> <p>The Council’s objective is to add more operational detail to the LPSS Policy D3 for development proposals affecting Scheduled Monuments &amp; Registered Parks and Gardens, to ensure their continued protection by having a policy that includes the following measures:</p> <p><b>Scheduled Ancient Monuments</b></p> <p>1) Proposals affecting scheduled ancient monument will be expected to pay consideration to:</p> <p>a) The presumption against substantial harm to or loss of scheduled ancient monuments;</p> <p>b) The relationship of the monument with other archaeology and the wider landscape in which it should be interpreted;</p> <p>c) The condition and management of the monument;</p> <p>d) The existing and future security of the monument; and</p> <p>e) The desirability of increasing understanding, interpretation and public access In such cases, an appropriate archaeological evaluation/assessment of significance by a suitably qualified person will be required.</p> <p>2) Development that would prejudice the fabric or setting of a scheduled ancient monument or planning applications which do not provide satisfactory information about the implications of the proposal upon a scheduled ancient monument, will be resisted.</p> <p><b>Registered Parks and Gardens</b></p> <p>3) Proposals affecting a registered historic park and garden will be expected to pay consideration to:</p> <p>a) The presumption against substantial harm to or loss of a nationally registered historic park and garden;</p> <p>b) The desirability of preserving or enhancing the special historic interest;</p> <p>c) Safeguarding those features which form an integral part of its special character and appearance;</p> <p>d) Ensure that development does not detract from the enjoyment, layout, design, character, appearance or setting of the Park or Garden, key views out from the Park, or prejudice its future restoration.</p> <p>4) Development that would prejudice the fabric or setting of a registered park and garden or planning applications which do not provide satisfactory information about the implications of the proposal upon a registered park and garden, will be resisted.</p>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to protect scheduled monuments and registered parks and gardens. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy D20: Non-designated heritage assets	<p>The Council’s objective is to ensure that the value and significance of the borough’s non-designated heritage assets are protected so that they continue to contribute to the richness of the historic environment and inform future development and regeneration of the borough by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Places a requirement for all proposals affecting non-designated heritage assets, and/or their setting, to be supported by a Statement of Significance and Impact that is proportionate to the significance of the asset and which justifies the changes to the asset.</li> <li>2) Supports the safeguarding of non-designated heritage assets of local significance that have been identified as one of the following;               <ol style="list-style-type: none"> <li>a) Locally Listed Building or Buildings of Merit identified in neighbourhood plans</li> <li>b) Locally Listed Historic Park or Garden</li> <li>c) County Site of Archaeological Importance</li> <li>d) Area of High Archaeological Potential</li> </ol> <p>Or which are identified during the pre-application or application processes</p> </li> <li>3) Stipulates that when determining applications, a balanced judgement is to be given to the scale of any harm against the degree and extent of any significance that the heritage asset possesses; any contribution it makes to the area, and the public benefits of the proposal.</li> <li>4) Requires that County Sites of Archaeological Importance or Areas of High Archaeological Potential which are demonstrably of equivalent significance to Scheduled Monuments be considered against Policy D19 if effected by a development proposal.</li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to protect non-designated heritage assets. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>
Policy ID5: Protecting open spaces	<p>The aim of this policy is to provide detail and clarity for policy ID4 in order to enhance protection of open space by having a policy that:</p> <ol style="list-style-type: none"> <li>1) Clarifies that where provision of open space exceeds OSSRA minimum standards, it does not mean that an open space site will be considered surplus to requirements. An open space will not be considered surplus to requirements unless:               <ol style="list-style-type: none"> <li>a) an analysis has shown that the land is no longer needed as open space, including consideration as to whether the site can be repurposed in order to correct deficits in other open space typologies, or the site is not of sufficient quality to be considered open space and cannot be improved, and</li> <li>b) The loss of the space would not result in a deficit in open space in terms of accessibility, quality or quantity.</li> </ol> </li> <li>2) Requires any development on open space to achieve biodiversity net gains in line with Policy P7.</li> <li>3) Does not permit the loss of any open space that has a specific nature conservation, historic, cultural or recreational value.</li> <li>4) Clarifies that development will be acceptable on open spaces where the development is beneficial to the role and function of the site and its ancillary uses.</li> </ol>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to protect open spaces. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision																																				
Policy ID6: Open space in new developments	<p>The aim of this policy is to ensure that new developments provide new open spaces that provide best value in terms of multi-functional benefits by having a policy that includes the following provisions:</p> <p><b>Residential developments</b></p> <ol style="list-style-type: none"> <li>1) Supports provision of new open space that meets the need for open space as set out in this policy.</li> <li>2) Developments that reach the thresholds in the table below will generally be expected to provide new open space of the following typologies on-site. Where no on-site provision for a particular type of open space can be provided, a financial contribution will be sought for provision of new and/or improvement to existing open spaces off-site.</li> </ol> <table border="1"> <thead> <tr> <th>Open space typology</th> <th>11-49 dwellings</th> <th>50-249 dwellings</th> <th>250+ dwellings</th> <th>Strategic sites (In LPSS)<sup>36</sup></th> </tr> </thead> <tbody> <tr> <td>Amenity/Nat. Green Space</td> <td>✓</td> <td>✓</td> <td>✓</td> <td>✓</td> </tr> <tr> <td>Parks &amp; Rec. Grounds</td> <td>X</td> <td>X</td> <td>✓</td> <td>✓</td> </tr> <tr> <td>Play Space (children)</td> <td>X</td> <td>✓</td> <td>✓</td> <td>✓</td> </tr> <tr> <td>Play Space (Youth)</td> <td>X</td> <td>X</td> <td>✓</td> <td>✓</td> </tr> <tr> <td>Allotments</td> <td>X</td> <td>X</td> <td>X</td> <td>✓</td> </tr> </tbody> </table> <ol style="list-style-type: none"> <li>3) Where new open space is provided, it should meet the following quantity and access standards:</li> </ol> <table border="1"> <thead> <tr> <th>Typology</th> <th>Quantity standards (ha/1000 people)</th> <th>Access standard (maximum distance from the new homes)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Open space typology	11-49 dwellings	50-249 dwellings	250+ dwellings	Strategic sites (In LPSS) <sup>36</sup>	Amenity/Nat. Green Space	✓	✓	✓	✓	Parks & Rec. Grounds	X	X	✓	✓	Play Space (children)	X	✓	✓	✓	Play Space (Youth)	X	X	✓	✓	Allotments	X	X	X	✓	Typology	Quantity standards (ha/1000 people)	Access standard (maximum distance from the new homes)				<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to provide open spaces in new developments. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>
Open space typology	11-49 dwellings	50-249 dwellings	250+ dwellings	Strategic sites (In LPSS) <sup>36</sup>																																		
Amenity/Nat. Green Space	✓	✓	✓	✓																																		
Parks & Rec. Grounds	X	X	✓	✓																																		
Play Space (children)	X	✓	✓	✓																																		
Play Space (Youth)	X	X	✓	✓																																		
Allotments	X	X	X	✓																																		
Typology	Quantity standards (ha/1000 people)	Access standard (maximum distance from the new homes)																																				

<sup>36</sup> Site Allocations: A24 – Slyfield Area Regeneration Project; A25 – Gosden Hill; A26 – Blackwell Farm; A31 – Land to the South and East of Ash and Tongham; and A35 – Former Wisley Airfield.

Policy Number	Policy Description (Preferred Option)		Likely Significant Effects Screening Decision
	Allotments	0.25	480 metres or 10 minutes' walk time
	Amenity Green Space	1 (total)	270 metres or 15 minutes' walk time
	Natural Green Space		ANGSt standard
	Parks & Recreation Grounds	1.35 public & private of which a minimum of 0.8 is public	720 metres or 15 minutes' walk time
	Play Space (Children)	0.05	480 metres or 10 minutes' walk time
	Play Space (Youth)	0.03	720 metres or 15 minutes' walk time
	<p>4) The parks and recreation grounds standard includes an allowance for playing pitches. Further detail regarding the need for playing pitches of different types will be set out in the Council's Playing Pitch Strategy. A minimum of 0.8ha/1000 of the total 1.35ha/1000 must be for public space. Contributions towards private sport provision will be acceptable where there is clear public benefit, for example through inclusion of a community access agreement that enables participation by all members of the community.</p> <p>5) New developments are expected to provide an element of community growing space where appropriate. This may be particularly appropriate for denser developments where residents may have limited access to private gardens of their own, where smaller plots and shared growing spaces would be attractive and where maintenance arrangements are put in place to prevent the spaces falling into neglect.</p> <p>6) The occupancy rates of new homes (used to calculate the total number of residents) are required to be based on the most recent census information or other robust data, taking into account the likely child yield as a result of the housing mix when considering child and youth play space.</p> <p>7) Proposals for new open space are expected to aim to correct any existing deficiencies in specific types of open space in the locality of the development. The Council will work with applicants to identify open space needs and will support proposals that deviate from the mix of typologies set out in this policy where deficiencies are corrected, and the full provision of open space is made.</p> <p><b>Commercial developments</b></p>		

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<p>8) Commercial sites will be encouraged to provide areas of amenity open space of an appropriate size, scale and character within or adjacent to the development. The level of provision will be decided on a case-by-case basis.</p> <p><b>Quality and design of new open space</b></p> <p>9) New open spaces are required to be multi-functional spaces that deliver a range of benefits including biodiversity gains, flood risk improvements, climate change measures and social inclusivity.</p> <p>10) New open spaces are required to meet minimum size, design and quality standards as set out in the Open Space, Sports and Recreation Assessment. In particular, areas of land proposed for Amenity Green Space must be greater than 0.15ha in size. New open spaces should be safe and secure for all members of the community.</p> <p>11) Open spaces are expected to support and enhance the existing rights of way network, providing new footpaths and cycle links where possible, with regard to the Council's identified opportunities for high quality walking and cycling networks (see Policy ID10) and where compatible with the specific purpose of the open space. Sites are expected to be designed to link up open spaces as much as possible.</p>	
<p>Policy ID7: Sport, recreation and leisure facilities</p>	<p>To have a policy that supports development that provides, increases or improves opportunities for public sport, recreation and leisure, including schemes for new, replacement and extensions to existing facilities, and engineering works, if:</p> <ol style="list-style-type: none"> <li>1) they support and enhance the existing rights of way network, providing new footpaths and cycle links where possible with reference to Policy ID10: Cycle Networks.</li> </ol> <p>Large sport, recreation and leisure facilities are expected to:</p> <ol style="list-style-type: none"> <li>2) restrict built development to that wholly necessary to support the recreational or leisure use and ancillary activities, and</li> <li>3) for developments that will have high water usage, include water collection and storage measures in order to avoid abstraction from surface water bodies or groundwater or recourse to the public water supply.</li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development policy which aims to provide increase and improve opportunities for public sport, recreation and leisure. Any proposals would be subject to the provisions of Policy P5 in adopted LPP1 which states that <i>'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 Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development'</i>.</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy ID8: Community facilities	<p>The aim of this policy is to enable access to community facilities, supporting healthy and inclusive communities, by having a policy that:</p> <p><b>Proposals for new community facilities including their replacement or expansion</b></p> <ol style="list-style-type: none"> <li>1) Supports permission for community facilities within urban areas and villages provided that:               <ol style="list-style-type: none"> <li>a) they are appropriate in design terms;</li> <li>b) there are no unacceptable transport impacts; and</li> <li>c) there are no undue detrimental impacts on amenities of neighbouring properties.</li> </ol> </li> <li>2) Enables the provision of accessible and viable community facilities by:               <ol style="list-style-type: none"> <li>a) expecting that they are located and designed so that they can be conveniently accessed via public transport, walking and cycling;</li> <li>b) encouraging their co-location with compatible and mutually supportive facilities or uses;</li> <li>c) supporting complementary or ancillary uses, closely associated with or as part of the facility, provided they do not detract from the facility and its primary function.</li> </ol> </li> </ol> <p><b>Proposals for the loss of community facilities</b></p> <ol style="list-style-type: none"> <li>3) Resists the loss or change of use of community facilities, with proposals for such potential loss or change of use required to demonstrate that:               <ol style="list-style-type: none"> <li>a) the retention of the facility has been explored without success by offering it for sale or lease for its existing community use for at least 18 months;</li> <li>b) offering it for sale or lease under (a) has included consideration of alternative suitable community facility uses, before change of use to residential or other use with no ongoing community facility use is permitted; and</li> <li>c) adequate alternative provision is demonstrated to exist in the locality or is made available in an agreed suitable location.</li> </ol> </li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to enable access to community facilities. Any proposals would be subject to the provisions of Policy P5 in adopted LPP1 which states that <i>'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 Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development'</i>.</p> <p>No linking impact pathways.</p>
Policy ID9: Retention of public houses	<p>The preferred option is to develop a policy that resists applications for redevelopment or changes of use of public houses to alternative uses, except where their continued use as a pub is no longer economically viable.</p> <p>The policy would include the following specific requirements:</p> <ol style="list-style-type: none"> <li>1) Applications for development involving the loss or partial loss of a public house will be required to provide evidence that the building has been marketed actively and comprehensively as a public house and alternative community facility for a continuous period of at least 18 months, ending close to or immediately prior to submission of the application or preapplication enquiry. For marketing of a public house to be considered active and comprehensive, it will be required to fulfil the relevant criteria in the Council's Marketing Supplementary Planning Document.</li> <li>2) For public houses located outside the boundary of the town centre, applicants will also be required to undertake and provide details of:</li> </ol>	<p>No Likely Significant Effects</p> <p>This policy is a design/development management policy which aims to resist applications for redevelopment of public houses. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
	<ul style="list-style-type: none"> <li>d) public consultation to ascertain the value of the public house to the local community;</li> <li>e) an evaluation of the public house's continued viability, with consideration of its existing and potential trade; and</li> <li>f) an assessment of alternative licensed premises within easy walking distance of the public house which is the subject of the application; and whether such alternative premises offer similar facilities (for example restaurants, function rooms, beer gardens) and a similar community environment.</li> </ul> <p>3) The loss of part of a public house, including car parking or other facilities complementary to its operation as a public house, will be resisted where it would adversely affect such operation, unless the marketing required under this policy demonstrates the public house use to be unviable.</p>	
<p>Policy ID10: Achieving a comprehensive Guildford borough cycle network</p>	<p>The aim of this policy option is to achieve a comprehensive Guildford borough cycle network. The Policies Map will be updated using the cycle network plan outputs from the following sources:</p> <ul style="list-style-type: none"> <li>• Guildford BC's Route Assessment Feasibility Study, for the Guildford urban area. [Available as Appendix 1].</li> <li>• Surrey CC's Guildford Local Cycling Plan, particularly for the rest of the borough outside of the Guildford urban area. [Available as Appendix 2].</li> </ul> <p>The Policies Map will therefore show specific routes along which the Council, working with Surrey County Council the Local Highway Authority and other partners, will undertake or promote measures to encourage cycling, including improvements to the safety and convenience of the routes, the designation of cycle tracks, the designation of cycle lanes, and the signposting and the provision of cycle parking facilities.</p> <p>The policy will require that new developments have regard to the Guildford borough cycling plan, as represented on the updated Policies Map, in addressing the requirements of Policy ID3 Sustainable transport for new developments in the Local Plan: Strategy and Sites.</p> <p><b>Potential advantages of this policy option:</b></p> <ul style="list-style-type: none"> <li>• Combines the best of the two evidence sources.</li> <li>• Provides for a denser and safer cycle network in the Guildford urban area.</li> <li>• Provides a common, updated basis for the improvement of the Guildford borough cycle network.</li> </ul> <p><b>Potential disadvantages of this policy option:</b></p> <ul style="list-style-type: none"> <li>• The Guildford BC study identified a denser network in the Guildford urban area, which is likely to involve greater expenditure to realise.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy which aims to achieve a comprehensive cycle network. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways.</p>

Policy Number	Policy Description (Preferred Option)	Likely Significant Effects Screening Decision
Policy ID11: Parking standards	<p>The aim of this policy option is to:</p> <ol style="list-style-type: none"> <li>1) Define maximum car parking standards for new residential developments in Guildford town centre.</li> <li>2) Define one set of minimum car parking standards for new residential developments in the rest of Guildford borough (except Guildford town centre).</li> <li>3) Define expected vehicle parking standards for new non-residential developments across the whole borough.</li> <li>4) Define minimum cycle parking standards for both new residential and non-residential developments across the whole borough.</li> <li>5) Define electric vehicle charging standards consistent with Surrey CC's Vehicular and Cycle Parking Guidance (2018) plus an additional requirement with respect to non-allocated car spaces in new residential developments.</li> </ol> <p>Tables 3 - 7 below provide draft standards for items 1-5 above respectively.</p> <p><b>Potential advantages of this policy option:</b></p> <ul style="list-style-type: none"> <li>• Contribute to optimising the density of development in Guildford town centre given that it is well served by public transport.</li> <li>• Reduced car trip making for occupants of and visitors to residential developments in Guildford town centre, all other factors being equal.</li> <li>• Avoid potential problems of congested on-street parking in new development and overspill parking on adjacent local streets in the rest of the borough.</li> <li>• Consistent with Surrey CC's Vehicular and Cycle Parking Guidance (2018) with respect to standards for both the minimum provision of cycle parking and electric vehicle charging facilities.</li> </ul> <p><b>Potential disadvantages of this policy option:</b></p> <ul style="list-style-type: none"> <li>• Will not contribute to optimising the density of residential development in areas of the borough outside Guildford town centre.</li> <li>• Increased car trip making for occupants of and visitors to residential developments outside of Guildford town centre, all other factors being equal.</li> <li>• Inconsistent with Surrey CC's Vehicular and Cycle Parking Guidance (2018) with respect to vehicular parking standards for both new residential developments outside of the Guildford town centre and for all non-residential developments.</li> </ul>	<p>No Likely Significant Effects</p> <p>This is a design/development management policy for parking within the borough. It does not provide for a quantum of development or identify any locations for development</p> <p>No linking impact pathways</p>

## 5. In-combination Assessment

- 5.1 The Guildford LPP2 must be looked at in-combination with other plans and projects within 5km of the SPA. The plans and projects looked at within the in-combination assessment are listed in paragraph 2.23.
- 5.2 The location of the Thames Basin Heaths SPA has resulted in the area being subject to high development pressure. Which can increase recreational pressure and urbanisation within the SPA.
- 5.3 In 2005, a visitor assessment of the Thames Basin Heaths SPA<sup>37</sup> determined that the majority of visitors travel by car and drive relatively short distances (less than 5km). This helped determine that any new residential development within 5km of the SPA could result in likely significant effects upon the SPA.
- 5.4 Therefore, although a borough's contribution may only be small alone it must be looked at as an accumulation of small effects with other boroughs within the 5km boundary in which it is thought LSE may occur. Development across all boroughs within 5km of the boundary of the SPA could therefore have a large adverse effect upon the SPA with regards to recreational pressure and urbanisation.
- 5.5 English Nature (now Natural England) published a Draft Delivery Plan for the Thames Basin Heaths SPA in May 2006, partly in response to the European Court of Justice ruling of October 2005. This is updated by the 'Thames Basin Heaths Special Protection Delivery Framework' published by the Thames Basin Heaths Joint Strategic Partnership Board in January 2009.
- 5.6 These documents aim to allow a strategic approach to accommodating development by providing a method through which local authorities can meet the requirements of the Habitats Regulations through avoidance and mitigation measures.
- 5.7 In addition, Guildford Borough Council has produced a Thames Basin Heaths Avoidance Strategy (2017), which has identified that between 400m and 5km of the SPA boundary, development will only be possible if it can demonstrate adequate avoidance or mitigation of significant adverse effects through recreational pressure.
- 5.8 The HRA of the adopted LPP1 concluded there would be no adverse effects on the integrity of the SPA either alone or in combination and Policy P5 enables the necessary mitigation measures to be delivered. As LPP2 presents no impact pathways to European sites, it can therefore be concluded no in-combination effects will arise from the LPP2.

## 6. Conclusions

- 6.1 The policies within the Guildford LPP2 are development management policies which set conditions within which developments must comply to ensure the protection of aspects of the Borough such as green space, conservation areas and heritage assets, as well as setting parameters for design of aspects of development including parking, housing density and alterations to current housing stock. No policies within the LPP2 allocate a quantum of residential or business development. All development in Guildford will be governed in part by Policy P5 of LPP1, which specifically sets out the criteria for protecting the Thames Basin Heaths SPA. That policy therefore forms part of the context for LPP2.

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<sup>37</sup> Liley, D, Jackson, D. & Underhill-Day, J. (2005). Visitor Access Patterns on the Thames Basin Heaths. English Nature Research Report 682. English Nature, Peterborough

- 6.2 No policies were assessed to have a likely significant effect upon the Thames Basin Heath SPA either alone or in combination with other plans or projects. All policies have been screened out as having no linking impact pathways to the European site.
- 6.3 Therefore, it can be concluded that there would be no likely significant effect on the SPA either alone or in-combination from the LPP2.

# Appendix A European Site Background

## Thames Basin Heaths SPA

### Introduction

- 6.4 Thames Basin Heaths consists of a number of fragments of lowland heathland scattered across Surrey, Hampshire and Berkshire. It is predominantly dry and wet heath but also includes area of deciduous woodland, gorse scrub, acid grassland and mire, as well as associated conifer plantations. Around 75% of the SPA has open public access being either common land or designated as open country under the Countryside and Rights of Way Act 2000. The SPA consists of 13 Sites of Special Scientific Interest (SSSI). Three of the SSSIs are also designated as part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC).
- 6.5 Ash to Brookwood Heaths SSSI, Whitmoor Common SSSI, Colony Bog and Bagshot Heaths SSSI and Ockham and Wisley Commons SSSI lie within or partly within Guildford Borough.
- 6.6 The location of the Thames Basin Heaths has resulted in the area being subject to high development pressure. English Nature (now Natural England) published a Draft Delivery Plan for the Thames Basin Heaths SPA in May 2006, partly in response to the European Court of Justice ruling of October 2005. This is updated by the 'Thames Basin Heaths Special Protection Delivery Framework' published by the Thames Basin Heaths Joint Strategic Partnership Board in January 2009. These documents aim to allow a strategic approach to accommodating development by providing a method through which local authorities can meet the requirements of the Habitats Regulations through avoidance and mitigation measures.
- 6.7 In addition, Guildford Borough Council has produced a Thames Basin Heaths Avoidance Strategy (2017), which has identified that between 400m and 5km of the SPA boundary, development will only be possible if it can demonstrate adequate avoidance or mitigation of significant adverse effects through recreational pressure.

### Features of European interest<sup>38</sup>

- 6.8 Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:
- 6.9 During the breeding season:
- Nightjar *Caprimulgus europaeus*: 7.8% of the breeding population in Great Britain (count mean, 1998-1999);
  - Woodlark *Lullula arborea*: 9.9% of the breeding population in Great Britain (count as at 1997);
  - Dartford warbler *Sylvia undata*: 27.8% of the breeding population in Great Britain (count as at 1999).
- 6.10 These species nest on or near the ground and as a result are susceptible to predation and disturbance.

### Conservation objectives

- 6.11 The Conservation Objectives for the European interests on the SSSI are, subject to natural changes:

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<sup>38</sup> Features of European Interest are the features for which a European site is selected. They include habitats listed on Annex 1 of the Habitats Directive, species listed on Annex II of the EC Habitats Directive and populations of bird species for which a site is designated under the EC Birds Directive.

- to maintain<sup>39</sup>, in favourable condition, the habitats for the populations of Annex 1 bird species+ of European importance, with particular reference to: lowland heathland and rotationally managed plantation.

## Key environmental conditions

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

- Appropriate management.
- Management of disturbance during breeding season (March to July).
- 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.

## Potential effects of the plan

6.13 Three potential impacts of the Proposed Submission Local Plan Strategy and Sites upon the SPA have been identified:

- Recreational disturbance.
- Air pollution
- Urbanisation.

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<sup>39</sup> Maintenance implies restoration if the feature is not currently in favourable condition.

+ Nightjar, woodlark and Dartford warbler.

