

# Guildford Borough Council

Report to: Executive

Date: 25 January 2024

Ward(s) affected: All

Report of Director: Place

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Report Status: Open

## **Review of the Guildford borough Local Plan: strategy and sites (2015-2034)**

### **1. Executive Summary**

- 1.1 The Council is required to review the Local Plan: strategy and sites (LPSS) within five years of adoption to decide if an update to the Plan is required. Having considered changes in national planning policy, associated guidance and relevant legislation, as well as changes in circumstances affecting Guildford borough since the LPSS was adopted, it is officers' view that the Local Plan should be updated.
- 1.2 Changes identified and which support a decision to update the LPSS include the level of local housing need based on Government's standard method calculation, which differs significantly from the LPSS housing requirement; changes in the economy; slower progress toward delivery of several strategic sites than that anticipated; and changes in planned delivery of supporting infrastructure such as the Guildford A3 scheme.
- 1.3 Furthermore, whilst many of the LPSS policies remain consistent with the NPPF, there are changes in planning related legislation and

guidance identified which support a decision to update the LPSS. More fundamentally, however, Government proposes to introduce significant planning reform flowing, at least in part, from the recent publication of the Levelling Up and Regeneration Act 2023 (LURA). These changes, which include a new NPPF and National Development Management Policies and other regulations, will impact on plan-making to the extent that 'new style' Local Plans are proposed.

- 1.4 Should the decision to update the Local Plan be supported, a further report will be prepared to propose appropriate timing for and budgetary requirements of the Local Plan update. Importantly, this would consider planning reform proposals including Government's timescales for initiating 'new style' Local Plans alongside the impacts of changes on the nature and form of plans and supporting evidence.
- 1.5 It is important to stress that the findings of this review do not change any elements of the LPSS. The LPSS remains part of the Council's Development Plan, which is the primary consideration in terms of determining planning applications. Due weight will be given to policies according to their degree of consistency with the NPPF, which for the most part they are.

## **2. Recommendation to Executive**

The Executive is asked to recommend to Full Council, meeting on 21 February 2024:

- 2.1. That the Guildford Local Plan: strategy and sites (2015-2034) be updated following the findings of the review undertaken in accordance with regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended); and
- 2.2. To note that a further report will be submitted to the Executive at a later date to clarify the appropriate timing for and budgetary requirements of the Local Plan update. This report should follow the national planning reform legislation and consider its implications for the update process.

### **3. Reason(s) for Recommendation:**

- 3.1. There is a statutory requirement to review the LPSS within 5 years of its adoption. This is to assess whether it needs updating. The review findings set out in this report indicate that an update of the LPSS would be an appropriate course of action to ensure that the Council's Local Plan remains effective into the future.
- 3.2. There are a range of uncertainties which impact on the context for the preparation of a new / updated Local Plan, some of which relate to the lack of clarity regarding the detail of proposed Government reforms to the planning system which guide plan-making. It is necessary that these are fully considered in order to set out recommendations regarding the scope and timing of a new plan-making process.

### **4. Exemption from publication**

No part of this report is exempt from publication.

### **5. Purpose of Report**

- 5.1. This report presents the findings of the review of the LPSS and seeks Council approval for officers to proceed with preparations to inform the update of the Local Plan. Detail on the proposed timing and budgetary implications of a Local Plan update will be presented for agreement at a later date.

### **6. Strategic Priorities**

- 6.1. An up to date Local Plan directly and indirectly contributes to achieving a range of the Council's strategic priorities across the housing and jobs, environment and community themes. This report recommends updating the Local Plan. An update provides the opportunity for policies to enable or continue to enable delivery of priorities such as reviving the Guildford town centre to unlock its full potential; providing and facilitating housing that people can afford; supporting high quality development of strategic sites; making travel

more sustainable and reducing congestion; protecting and enhancing our natural environment; and tackling inequality.

## **7. Review of the LPSS**

### a) Background

- 7.1. The LPSS was adopted by the Council on 25 April 2019. It is a statutory requirement<sup>1</sup> that a review of the LPSS is completed (every) five years from the date of adoption. This report meets that requirement by completing the review of the LPSS now, well ahead of the 25 April 2024 deadline.
- 7.2. To be effective and deliver the right outcomes, Local Plans need to be kept up to date. A review is the key means of assessing whether plan policies remain up to date. For Guildford borough, this review considers whether the LPSS policies need updating in accordance with paragraph 33 of the NPPF. The recently adopted Local Plan Development Management Policies (LPDMP) is not within the scope of this review, although any future update process may consider these policies at a later date.
- 7.3. Regarding the scope of the review, the NPPF indicates that the review ‘...should take into account changing circumstances affecting the area, or any relevant changes in national policy<sup>2</sup>.’
- 7.4. The National Planning Practice Guidance (NPPG) supplements this by listing what authorities can consider when determining whether a plan or policies within a plan should be updated (these are included at Appendix 1).

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<sup>1</sup> In terms of regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

<sup>2</sup> See NPPF, 2023 at paragraph 33

- 7.5. Furthermore, the NPPG<sup>3</sup> sets the expectation that authorities have due regard to the legal Duty to Cooperate (DtC) when to undertaking a review to assess if Local Plan policies need updating.
- 7.6. In this context, and to assist in meeting the expectations of Local Plan review set out in national policy and guidance, this review includes Officers' completion of:
- a schedule reviewing LPSS policies for consistency against the current NPPF and highlighting other material changes in circumstance e.g., new legislation, policy, guidance or evidence. (see 'the NPPF schedule' – included at Appendix 2).
  - the Planning Advisory Service, Part 1 Local Plan Review Assessment matrix which seeks to highlight any changing circumstances impacting the borough (see 'the PAS matrix' – included at Appendix 3)
  - a summary of DtC responses received following their consultation on the LPSS review process (see 'DtC responses summary' – included at Appendix 4)
- 7.7. As part of the review, officers also consider it necessary to reflect upon the national legislative changes already in place flowing from the recent publication of the Levelling up and Regeneration Act 2023 (LURA) or that are envisaged as part of Government's intended reforms to the national plan-making system. These are highlighted in the section below.

b) Findings of the LPSS review

- 7.8. Officers consider that the LPSS should be updated based on a combination of factors considered by this review. These include the changed, and changing, national policy context informing plan-making; indications of changing circumstances affecting Guildford borough; and the opportunity that a Plan update will provide to

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<sup>3</sup> See NPPG: Plan-making at Paragraph: 068 Reference ID: 61-068-20190723

address new and emerging priorities for the Council. These are set out in further detail as follows.

*Changes in National Planning Policy and associated Legislation and Guidance*

- 7.9. The LPSS was examined against the NPPF 2012, under transitional arrangements at the time. Since 2012, the NPPF has been updated several times including in 2018, 2019, 2021 and 2023 albeit that there have not been fundamental changes.
- 7.10. The NPPF schedule at Appendix 2 which reviews LPSS policies for consistency against the current NPPF reflects that the LPSS policies remain broadly consistent with the NPPF. However, several changes to legislation, policy and guidance are highlighted in the schedule. These include:
- changes to the Use Classes Order (including the introduction of Use Class E) and permitted development rights, which allow a wider range of uses without the need for planning permission. This has had the effect of reducing the scope of application of some of the LPSS employment and retail policies and in limited cases making some of the requirements more challenging to apply.
  - updates to legislation, planning policy and guidance impacting the expected content of Local Plans following the adoption of the LPSS. These include the NPPG introduction of requirements for Local Plans to set an expectation for the provision of First Homes and the 2021 Environment Act's mandatory 10% biodiversity net gain requirement to be secured as a planning condition on qualifying development. However, changes such as these occurred prior to the submission and adoption of the LPDMP and they have been incorporated into this second part of the Local Plan (in the case of the latter at a higher standard than that specified nationally). This has allowed the Council to keep its Development Plan up to date and in line with more recent national legislation, policy and guidance.

- 7.11. It is important to note, that this assessment of consistency with national policy is undertaken at a point in time where significant changes to the national planning system are underway.
- 7.12. Although these national reforms are not yet concluded and much of the detail remains unknown, it provides important context for the review of the LPSS, as it points to the likelihood of an imminent and significantly changed context for plan-making.
- 7.13. A notable step toward this altered context was the publication LURA in late 2023. Whilst much of its implementation is dependent on further secondary legislation/regulations, Government have also indicated that several further changes to the national planning context are planned to include:
- the publication of a new NPPF (this is more wide-ranging and distinct from the targeted changes that were consulted upon from December 2022 – March 2023 and which was published on 20 December 2023);
  - a proposed set of National Development Management Policies that will have the same status as Local Plan policy and with which local policy will not be allowed to conflict nor duplicate.
- 7.14. Further, Government intends to introduce ‘new style’ Local Plans as part of their planning reform process which are proposed to be:
- in the form of a single Local Plan, which is concise, more visual, and focussed on locally important matters.
  - prepared over a 30-month process, supported by proportionate evidence, following a series of ‘gateway’ assessments and formal examination which is limited to 6 months.
  - initiated, potentially in a staged process, commencing from autumn 2024 when Government indicates that relevant regulations, policy, and guidance will be in place to enable their production.

7.15. In this context, whilst the LPSS remains broadly consistent with the current NPPF (although there are a few areas where an update would ensure greater alignment), officers consider that an update would provide the opportunity to ensure that the Council's Local Plan remains consistent with national policy into the future. Government intentions for planning reform thus also favour a decision to update the Local Plan, in the form of a 'new style' Local Plan, as and when their proposals be realised. This would include consideration of any changes to the nature and form of Local Plans and supporting evidence, alongside consultation processes and impacts on Guildford borough's plan-making processes.

*Changing circumstances affecting Guildford borough*

7.16. There are several changed circumstances affecting the borough. An extensive evidence base has not been developed for the purposes of this review and the findings below do not seek to be comprehensive. This is considered a proportionate approach and in line with the NPPG<sup>4</sup>.

7.17. The following summary draws upon officers' review of the LPSS in relation to key considerations highlighted by the NPPG (Appendix 1) and the PAS matrix at Appendix 3. It reflects upon changing circumstances impacting on Guildford borough including in relation to local housing need; the economy; delivery of key site allocations and infrastructure; and the local environment and heritage context.

7.18. First, regarding local housing need. It is highly likely that moving forward, this figure will be different to that set out as an annual housing requirement of 562 dwellings per annum (dpa) in the LPSS. At this stage, the standard method produces a local housing need figure of 771 dpa for Guildford borough – an approx. 37% increase on the housing requirement figure.

7.19. The NPPG indicates that local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number

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<sup>4</sup> See NPPG: Plan-making at Paragraph: 068 Reference ID: 61-068-20190723



that is significantly below the number generated using the standard method<sup>5</sup>. However, this will require careful consideration as there are a range of uncertainties, which include:

- Potential changes to the standard method figure – it is not yet clear whether this figure for Guildford will change significantly based on new population projections / updates to the standard method. Government indicate that they will review the implications on the standard method of new household projections data based on the 2021 Census, which is due to be published in 2025.
- The basis for and degree to which reforms to the planning system will enable divergence from the standard method. Government has yet to clarify whether they will make clearer in the Framework that the outcome of the standard method is an advisory starting-point to inform plan-making – a guide that is not mandatory. Further they have yet to give more explicit indications in planning guidance of the types of local characteristics which may justify the use of an alternative method. Further demographic evidence would need to be undertaken to explore whether there is a case for Guildford to seek to justify divergence (e.g., based on previous overestimates due to student figures), however this can only be undertaken once the new Standard Method / projections are published and then only tested through the plan making process.

7.20. Thus, the review only considers the standard method figure for Guildford as it is, rather than whether there are exceptional circumstances which justify an alternative approach<sup>6</sup>. However, in short, the significant divergence between the LPSS housing requirement and the standard method figure contributes to the case that the Plan should be updated.

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<sup>5</sup> See NPPG: Plan-making at Paragraph: 062 Reference ID: 61-062-20190315

<sup>6</sup> See NPPF paragraph 61

- 7.21. Second, there have been changes in the economy during the past five years. In this regard, there are several aspects that are particularly relevant to planning.
- 7.22. The first is a change in shopping patterns. A greater proportion of shopping, particularly for comparison goods, is taking place online and this is forecast to continue increasing. This is the case nationally, as it is for Guildford. Consequently, the amount of floorspace needed for this type of retail activity is significantly less than was forecast as an input to the LPSS. The LPSS is, however, flexible in terms of the allocation of this form of floorspace. The production of updated evidence<sup>7</sup>, allowed for under the LPSS, contributed to enabling the Council to support an application reflecting a significantly altered proportion of retail (and other non-residential) floorspace than was initially envisaged under the North Street redevelopment site allocation (LPSS Policy A5).
- 7.23. The second is a change to employment patterns, and general changes in demand for various forms of office floorspace. The Council has yet to undertake an update of its Employment Land Needs Assessment (ELNA) and the impacts for Guildford borough are thus not yet known. However, the previous few years have shown an overall loss of office floorspace within the borough<sup>8</sup>. It is also not clear whether there is appetite to take up the allocated office floorspace in the Local Plan (albeit that 10 years remain in the plan period and further shifts may occur). Further, the Council's Economic Development Strategy<sup>9</sup> has highlighted several barriers that need to be overcome if the Council's ambitions for increased office floorspace are to be met. These include the provision of well-located high quality floorspace, alongside lower cost opportunities for innovators and entrepreneurs. An update to the Plan will provide an opportunity to interrogate

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<sup>7</sup> See the Retail Planning Statement and further retail planning advice for the Council in relation to the proposed Redevelopment of the North Street site - application ref: 23/P/01211

<sup>8</sup> See GBC Authority Monitoring Reports available at:  
<https://www.guildford.gov.uk/article/22879/Monitoring-the-Local-Plan>

<sup>9</sup> See Guildford Economic Development Strategy (2023) available at:  
<https://www.guildford.gov.uk/article/25424/Strategies-and-economic-information>

further any potential shifts in the nature and extent of need for office floorspace in the borough and to continue to plan accordingly.

- 7.24. The third is a general trend of continued strong demand for storage, distribution, and logistics floorspace, in part in a response to changes in the way people shop for goods. As with the case of office floorspace, a future update of the Council's ELNA will assist in providing clarity regarding any specific changes in need for this form of floorspace in Guildford borough.
- 7.25. The fourth is a change within the (residential) property market, which is strongly influenced by interest rates and the cost of development, including building, finance, and labour costs. In all aspects, the past several years has reflected a period of volatility. Changes in the property market are particularly relevant to the level of viability of development. Whilst the Council's viability evidence is relatively recent, having been updated to support the LPDMP, an update to the Local Plan would provide the opportunity to revisit viability and its relationship to a range of infrastructure and policy costs to ensure that development continues to be deliverable.
- 7.26. All these shifts in economic circumstances have relevance for the review. In this regard, whilst the full details of changes reflected upon are in most cases not yet locally nor recently quantified, it is considered that there is sufficient indication of changes in economic circumstances to support a review finding that the LPSS should be updated.
- 7.27. Third, there have been changes in the anticipated trajectory of delivery of key LPSS site allocations. Whilst at adoption the Plan's trajectory had indicated that several strategic sites<sup>10</sup> would together begin to contribute to housing delivery in the first five years of the Plan, this has not occurred for a variety reasons. Indeed, the most

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<sup>10</sup> These are the major urban extensions at Gosden Hill Farm (LPSS Policy A25) and Blackwell Farm (LPSS Policy A25), alongside the new settlement at the Former Wisely Airfield (LPSS Policy A35).

recently published housing trajectory<sup>11</sup> indicates that delivery on these sites is only likely to begin from 2028/29 onward. Whilst these sites have been delayed, some windfall development has occurred, including significant levels of purpose-built student accommodation which has assisted in maintaining a robust 5-year housing land supply position over the review period. An update will provide an opportunity to ensure that the Council can continue to put forward deliverable and developable site allocations.

- 7.28. Fourth, regarding key infrastructure to support plan growth, whilst some planned infrastructure has been or is progressing toward delivery, its provision is often contingent upon delivery of homes, including the strategic sites. As noted, much of this growth has yet to come forward and the specific mitigation packages for several strategic sites are not yet agreed. There has however been a confirmed significant change in planned key supporting infrastructure in that the A3 Guildford scheme is no longer part of National Highways Road Investment Strategy (RIS) as was anticipated at the time of adoption of the LPSS.
- 7.29. Finally, regarding changes in local environmental or heritage context, the review has not indicated that there are clear and confirmed changes that would impact on the delivery of the plan. This is not surprising as changes in this context typically do not occur rapidly. However, the review has noted several processes in this area which have the potential to influence planning in the borough in the future, including:
- ongoing work by Natural England to review the Surrey Hills AONB (now Surrey Hills National Landscape) boundary, potentially significantly increasing the area protected by this designation;
  - work by the EA on flood modelling and the mapping of flood zones (which has been updated since the LPSS was adopted), as well as

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<sup>11</sup> See page 347 Appendix 8: Five Year Housing Land Supply available at: <https://www.guildford.gov.uk/article/25375/Land-Availability-Assessment>

their joint investigation with the Council regarding the potential for a flood alleviation scheme in Guildford town centre;

- continued work to monitor air quality and the declaration of a new air quality management area (AQMA) in Guildford town centre.
- 7.30. An update to the Local Plan would enable further consideration of the outcomes of these processes and any implications for plan-making.

*Opportunity to address new and emerging priorities for the Council*

7.31. The adoption of the LPDMP in 2023 enabled the Council to respond to several environmental priorities, including biodiversity, protection of heritage assets, and climate change. In doing so, it sought to balance achieving high standards, such as class leading levels of biodiversity net gain, whilst not threatening the overall delivery of development. An update to the Local Plan would provide an opportunity to revisit priorities and ensure the Council's Local Plan continues to deliver across its strategic objectives and in alignment with the Council's Corporate Strategy.

c) Implications for plan-making and decision-taking

7.32. It is important to stress that the findings of this review, which point to the need to update the LPSS, do not change any of the elements of the adopted Plan, nor mean that it is redundant. To change the LPSS would require an 'update' of the plan rather than a 'review', as the latter merely concludes whether an update is necessary.

7.33. Further, the LPSS policies (alongside those of the LPDMP and other Development Plan Documents / DPDs) remain the primary consideration in terms of determining planning applications. The NPPF indicates at paragraph 225 that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the latest NPPF. Due weight should be given to them, according to their degree of consistency with the Framework (the closer the policies in the plan to the policies in the

Framework, the greater the weight that may be given). For the most part the LPSS policies are consistent with the NPPF.

- 7.34. It is important to highlight the implications of the review findings regarding how 5-year housing land supply will be assessed after the LPSS is five years old. The NPPF reflects the following at paragraph 77:

*'...local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing<sup>[...]</sup>, or a minimum of four years' worth of housing if the provisions in paragraph 226 apply. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old<sup>42</sup>.*

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*<sup>42</sup> Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance'.*

- 7.35. This review does not seek to claim that the strategic policies including Guildford borough's housing requirement of 562dpa do not require updating. In accordance with the NPPF, Guildford borough will need to demonstrate at least a five-year housing supply against the standard method figure in future. It is envisaged that a future LAA and associated 5-year housing land supply calculation will need to reflect upon this changed circumstance with updated supply and local housing need figures at that time. At this stage it is not possible to confirm whether the Council will in future continue to have a robust 5-year housing land supply. Variables both in terms of the future supply of deliverable sites, and potential changes to levels of local housing need (in terms of the standard method calculation) will determine this outcome.

## **8. Consultations**

- 8.1. As part of the review process, the Council has undertaken consultation with its DtC partners. A summary of responses received

is outlined at Appendix 4. The comments received in the main relate to strategic matters that will require cooperation as part of the update process rather than the review process.

- 8.2. Further, prior to finalisation of this report, internal consultation has included discussion of the scope of the review with the Joint Executive Advisory Board (see section 15 below) and Planning Policy Board.

## **9. Key Risks**

- 9.1. Should the Council decide to update the LPSS, key risks relate primarily to current levels of uncertainty relating to the planning reform process. Government has indicated the latest date for plan-makers to submit local plans for examination under the current system as 30 June 2025. This timeframe is clearly unachievable for Guildford borough considering the need for evidence gathering, plan drafting and at least two rounds of consultation prior to submission.
- 9.2. A likely scenario will thus be the drafting of an updated or new-style Local Plan under a reformed planning system including National Development Management Policies and a new NPPF, however, many requirements of new style plan-making are not yet clear. In order to manage this risk, officers propose that further consideration is given to planning reforms as they emerge and a timetable and budget requirements are proposed in this context. If the Government's reforms do not come to pass, this approach remains prudent.
- 9.3. Should the Council decide to not update the plan, the plan risks becoming less aligned to national policy over time and less effective as a tool to support decision-taking within a plan-led system.
- 9.4. Further, there is a risk that the adopted plan may not provide a 5-year housing land supply at some point in the future. The likelihood of this risk being realised is increased once the standard method is used to calculate the Council's 5-year housing land supply figure and should planned housing supply not come forward. Without an update to the Local Plan, the potential exists that any such period, where the Council's strategic housing policies are considered out of date and

NPPF paragraph 11d is engaged, is extended. Should this come to pass, it would weaken the Council's position in relation to refusing planning permission or defending appeals in relation to inappropriate and/or unplanned speculative development. Updating the Local Plan is a clear means by which the Council can mitigate this risk.

## **10. Financial Implications**

- 10.1. A further report will be prepared which clarifies the budgetary requirements of the Local Plan update. This would be subject to its own decision in terms of approval of budget and timeframes for this undertaking. These details are not yet known and may be influenced by planning reform proposals. As such, this report results in no immediate financial implications for the Council.
- 10.2. The production of a Local Plan is a costly, time-consuming and resource intensive process, requiring a capacitated internal team alongside funding for specialist evidence base, legal support, community consultation, examination including independent Government Inspector and Programme Officer costs. Estimates several years ago were that the cost of producing a Local Plan were around £1m for a Local Authority over a four-year period<sup>12</sup>. This may be considered somewhat low in terms of accounting for the full cost of production of the Plan. Cost is influenced by the complexity of the Plan, the level of public engagement and the time taken to produce it, amongst other factors.
- 10.3. The Planning Policy team does not currently hold sufficient budget to support the production of an updated plan with the 2024/25 budget for specialist consulting work in the region of £100,000. Further, a reserve amount that was set aside for Local Plan production has been removed as part of recent savings initiatives. Thus, it is envisaged that subject to agreement that an update of the Plan is required, a further report to be tabled would include a growth bid seeking to cover plan-making costs over a number of financial years.

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<sup>12</sup> See RTPi: Proposals for Planning Reform in England, 2021 available at: <https://www.rtpi.org.uk/policy-and-research/planning-for-a-better-future/#M-1.1>



## **11. Legal Implications**

- 11.1. The review is undertaken in line with regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). In this regard, the Council is required to complete the review of the LPSS every five years, starting from the date of adoption of the local plan (i.e., in this case by 25 April 2024).
- 11.2. Any decision recommended to full Council takes account of the risks, benefits and duties set out in this report.

## **12. Human Resource Implications**

- 12.1. The decision to update the Plan will be followed up by a detailed report setting out the proposed timescales for this process. The update will require a fully staffed planning policy team and would require inputs from other Council teams during the plan-making process.

## **13. Equality and Diversity Implications**

- 13.1. Public authorities are required to have due regard to the aims of the Public Sector Equality Duty (Equality Act 2010) when making decisions and setting policies. Whilst LPSS policies may materially impact on equality issues, those policies are not being updated by this report. It has therefore been concluded that there are no equality implications arising directly from this report.
- 13.2. It is our responsibility to ensure that our policies, procedures and service delivery do not discriminate, including indirectly, on any sector of society. Council policies, procedures and service delivery may have differential impacts on certain groups with protected characteristics. Any future work undertaken in relation to updating of Local Plan policies will, where necessary, include the completion of an Equalities Impact Assessment (EqIA) to demonstrate how the proposed updates impact on persons with protected characteristics.

## **14. Climate Change/Sustainability Implications**

- 14.1. There are no direct climate change / sustainability implications arising from this report. Should it be concluded that an update to the Local Plan is appropriate, this process will provide an opportunity to consider further policy to support the Council's climate change priorities.

## **15. Executive Advisory Board comments**

- 15.1. Whilst this committee report has not been tabled at EAB, Joint EAB considered a presentation on the context and scope of the Local Plan review at their meeting on 4 December 2023. The Joint EAB confirmed their understanding of the difference between the current 'review' process compared to any future 'update' process which would entail the full plan-making process and include public participation. They also understood the reasons why the review process was recommending the LPSS be updated.

## **16. Summary of Options**

- 16.1. The review of the LPSS points to its update being an appropriate course of action. The alternative course of action would be to not update the LPSS, however, over time this would likely result in the Plan becoming less effective. It is in the Council's interests to maintain an up-to-date Local Plan.

## **17. Conclusion**

- 17.1. In light of the review of the LPSS, officers' recommendation is that the Local Plan should be updated. This will assist in ensuring that the Plan remains effective into the future and responds to existing and imminent changes to National Policy, Guidance and Legislation. Importantly, local changes in circumstance indicate that an update is an appropriate course of action. Should the decision to update the Local Plan be supported, a further report will be prepared to propose appropriate timing for and budgetary requirement of the Local Plan

Update. This would consider planning reform proposals including Government's timescales for initiating 'new style' Local Plans.

## **18. Background Papers**

18.1. None

## **19. Appendices**

19.1. Appendix 1: NPPG extract

19.2. Appendix 2: The NPPF Schedule

19.3. Appendix 3: The PAS Matrix

19.4. Appendix 4: DtC responses summary

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## **Appendix 1: NPPG extract – Plan Making**

(Available at: <https://www.gov.uk/guidance/plan-making#plan-reviews>)

### **What can authorities consider when determining whether a plan or policies within a plan should be updated?**

The authority can consider information such as (but not exclusively):

- conformity with national planning policy;
- changes to local circumstances; such as a change in Local Housing Need;
- their Housing Delivery Test performance;
- whether the authority can demonstrate a 5 year supply of deliverable sites for housing;
- whether issues have arisen that may impact on the deliverability of key site allocations;
- their appeals performance;
- success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report;
- the impact of changes to higher tier plans;
- plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need;
- significant economic changes that may impact on viability.; and
- whether any new social, environmental or economic priorities may have arisen.

Paragraph: 065 Reference ID: 61-065-20190723

Revision date: 23 07 2019

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## Appendix 2: Review of LPSS policies against NPPF/NPPG

The information contained in the following table is intended to indicate the extent to which the LPSS policies continue to be in line with current policy, guidance and planning legislation, and therefore the weight that may continue to be given to them in determining planning applications. They do not attempt to assess the extent to which they may require updating or what evidence base is likely to be necessary to understand how they may be updated. Significant reforms to the plan-making system are being brought in that will facilitate the creation of ‘new style’ local plans. This is anticipated to be implemented in Autumn 2024. Given the uncertainty regarding the scope and content of new style local plans, it is not considered possible at this time to undertake this level of analysis. Instead, this exercise will be undertaken once these reforms are in place and the Council is in a position to begin to the update to the LPSS/create a new style local plan.

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
<b>Chapter 4.1: Strategic Policies</b>	Left blank	Left blank
Policy S1: Presumption in favour of sustainable development	The Policy is consistent with the NPPF in particular paragraph 11 which states that plans and decisions should apply a presumption in favour of sustainable development.	

<p>Policy S2: Planning for the borough - our spatial development strategy</p>	<p>Paragraph (1) of Policy S2 includes a housing requirement of 562 dwelling per annum across the plan period (2015 – 2034). In accordance with NPPF paragraph 77, Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their local housing need where the strategic policies are more than five years old. Local housing need is calculated using the standard method. For Guildford this figure is currently 771 dwellings per annum.</p> <p>Paragraph (2) of Policy S2 is consistent with Section 6 of the NPPF by identifying sites for local and inward investment from businesses to meet anticipated needs over the plan period, and with paragraph 90, which states that planning policies should “...allocate a range of suitable sites in town centres [for retail and other main town centre uses] to meet the scale and type of development needed, looking at least ten years ahead”. The evidence base informing the retail floorspace targets in paragraph (2) was partly updated in 2022, in</p>	<p>A partial update to the Council’s 2015 Retail and Leisure Study and 2017 Addendum, focused on need for comparison retail and food and drink uses in the town centre, was undertaken in 2022 in support of a mixed-use planning application (ref 23/P/01211) for the North Street site (LPSS site allocation A5), and reviewed in a Retail Planning Appraisal by Lambert Smith Hampton, commissioned by the Council. This highlighted significantly reduced need for floorspace for retail, and food and drink uses across the town centre.</p>
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LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>respect of need for comparison retail floorspace in the town centre.</p> <p>Paragraph (3) of Policy S2 is consistent with the NPPF and PPTS. However, the definition of a gypsy and traveller has changed. This will need to be considered in future when setting the pitch target for gypsies and travellers (as defined in PPTS Annex 1) which address the likely permanent and transit site accommodation needs of travellers in our area (see PPTS paragraph 9). The LPSS has however taken into account and sought to meet the needs of formerly non-PPTS travellers through its site allocations.</p>	<p>On 19 December 2023 the Government issued an update to PPTS Annex 1 glossary which amends the definition of a gypsy or traveller to now include those that have ceased to travel permanently. The Government intends to review the approach to this area of policy and case law in 2024.</p>

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
Policy S3: Delivery of development and regeneration within Guildford Town Centre	The Policy is consistent with the NPPF including the expectation that planning policies promote the long-term vitality and viability of town centres and encourage residential development on appropriate sites (see NPPF paragraphs 86a and f)	
<b>Chapter 4.2: Housing Policies</b>	Left blank	Left blank
Policy H1: Homes for all	The Policy is consistent with the NPPF including the expectation that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people including those who require retirement housing, housing with care and care homes, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes) (see NPPF paragraph 63)	<p>H1 (3) Ministry of Housing, Communities and Local Government is now called Department for Levelling Up, Housing and Communities</p> <p>Paragraphs 4.2.20 and 4.2.21 in the reasoned justification will need revising in light of the Government update to PPTS Annex 1 glossary which amends the definition of a gypsy or traveller to now include those that have ceased to travel permanently.</p>

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
Policy H2: Affordable homes	<p>The policy is consistent with the NPPF, including Paragraph 64 which states that planning policies should specify the type of affordable housing required where need is identified and that this should be provided on-site unless off-site provision or appropriate financial contribution in lieu can be robustly justified.</p> <p>The requirement in paragraph (4) for a minimum 70% of Section 106 affordable housing contributions to be affordable rent does not conflict with the expectation in the NPPG for a minimum 25% of affordable housing contributions to be First Homes, as this minimum 25% is met within the remaining 30% which paragraph (4) states must be 'other forms of affordable housing'.</p> <p>Paragraph 65 of the NPPF sets a 10-dwelling threshold below which affordable housing provision should not be sought outside of designated rural areas. The threshold for these</p>	

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	sites in Policy H2 is 11 or more dwellings, however a higher threshold does not conflict with national policy.	
Policy H3: Rural exception homes	The policy is consistent with the NPPF, which states that planning policies should support housing developments that reflect local needs, including rural exception sites, and allow an element of market housing on these sites for viability purposes (paragraph 82). It is also consistent with the NPPG, which encourages local authorities to produce policies specifying the proportion of market housing considered acceptable on rural exception sites, and under what circumstances.	
<b>Chapter 4.3 Protecting Policies</b>	Left blank	Left blank
Policy P1: Surrey Hills Area of	The Policy is consistent with the NPPF which seeks to conserve and enhance the landscape	The Surrey Hills AONB has been officially renamed as the Surrey Hills National Landscape.

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
Outstanding Natural Beauty	and scenic beauty in AONBs (see NPPF paragraphs 182 and 183)	<p>Natural England is currently undertaking a review of the AONB boundary however this is still at a relatively early stage. Greater weight will be able to be given to candidate AONB areas as the certainty regarding the proposals increases. Policy P1 will apply to these areas once they designated as AONB by Natural England.</p> <p>The 'Key Evidence' box refers to the Surrey Hills Area of Outstanding Natural Beauty Management Plan 2014-2019. This has been replaced by the Management Plan 2020 – 2025.</p>
Policy P2: Green Belt	The Policy is consistent with the NPPF which set out the exceptions which are not considered inappropriate development (see NPPF paragraphs 154 and 155)	
Policy P3: Countryside	The Policy is consistent with the NPPF which seeks to contribute to and enhance the natural and local environment by recognising the	

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	intrinsic character and beauty of the countryside (see NPPF paragraph 180)	
Policy P4: Flooding, flood risk and groundwater protection zones	<p>The policy is consistent with the NPPF, which states that development should be directed away from areas at highest risk of flooding and that, where development in these areas is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere. .</p> <p>The NPPF now expects planning policies to protect and <u>improve</u> water quality. Paragraph (6) of the policy is consistent with this through its protection for Groundwater Source Protection Zones and Principal Aquifers.</p> <p>The PPG now has guidance on water quality that reflects the Water Environment Regulations (WER). The WER replace the Water Framework Directive (WFD) so supporting text references in the policy to the WFD are out of date.</p>	<p>LPDMP Policy P10 (9) extends protection to surface Source Protection Zones and all Drinking Water Protected Areas in accordance with the designations on Defra’s Magic Map and EA position statements.</p> <p>Protection, enhancement and restoration of some waterbodies against specified targets are now required by the WER.</p>

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
Policy P5: Thames Basin Heaths Special Protection Area	<p>The policy is consistent with the NPPF though some terminology has changed.</p> <p>Policy P5 protects the Thames Basin Heaths Special Protection Area. The content is compliant with the NPPF.</p> <p>The policy refers to “European Sites” in accordance with the NPPF 2012. However, the NPPF 2021 replaces this with “habitats sites”. Special Protection Areas receive the same protection as before. The NPPF replaces references to the Habitats Directive with references to the Conservation of Habitats and Species Regulations 2017.</p>	The evidence box refers to “The Conservation of Habitats and Species Regulations 2010” rather than the current version dated 2017. The 2017 update consolidated amendments but did not alter the legal context.
<b>Chapter 4.4 Economy Policies</b>	Left blank	Left blank
Policy E1: Meeting employment and retail needs	Policy E1 is consistent with the NPPF, Section 6 of which indicates that planning policies should proactively support economic growth and productivity, taking account of local business needs and wider development opportunities, and identify strategic sites for local and inward	The references in paragraphs (1) and (2) to Class A (and B1a, B1b and B1c uses are no longer correct as these uses were replaced in the Use Classes Order (UCO) in September 2020 by Class E and sui generis uses. However, the description of

<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
	investment to meet anticipated needs over the plan period.	<p>the uses for which land allocated by the LPSS is designated (office, research &amp; development, industrial, retail, and food and drink) remain the same in the amended UCO and are referenced in the list of uses in LPSS Appendix 2: Glossary. The policy references therefore continue to be for these uses, regardless of the change to their use class.</p> <p>A partial update to the Council’s 2015 Retail and Leisure Study and 2017 Addendum, focused on need for comparison retail and food and drink uses in the town centre, was undertaken in 2022 in support of a mixed-use planning application (ref 23/P/01211) for the North Street site (LPSS site allocation A5), and reviewed in a Retail Planning Appraisal by Lambert Smith Hampton, commissioned by the Council. This highlighted significantly reduced need</p>



LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
		for floorspace for retail and food and drink uses across the town centre.
Policy E2: Location for new employment floorspace	The policy is consistent with the NPPF, Section 6 of which indicates that planning policies should proactively support economic growth and productivity, taking account of local business needs and wider development opportunities. Paragraphs (2) and (6) offer flexibly worded support for economic development proposals which accord with the NPPF requirement for policies to be sufficiently flexible to accommodate needs not anticipated in the Plan and to adapt to changes in economic circumstances.	The references in paragraph (3) to Use Classes B1a and B1b and in paragraph (7) to Use Class B1c are no longer correct as these uses were replaced by Use Classes E (g) (i), (ii) and (iii) respectively in the Use Classes Order amended September 2020. However, the description of these uses is unchanged in the amended Use Classes Order and is referenced in LPSS Appendix 2: Glossary, so the policy references therefore continue to be for these uses, regardless of the change to their use class.

<p>Policy E3: Maintaining employment capacity and improving employment floorspace</p>	<p>The policy is consistent with the NPPF, paragraph 86 of which states that planning policies should ‘identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period’. The sites that the policy designates for protection against redevelopment or change of use to non-employment uses accord with NPPF paragraph 87 by allowing clustering of industries and through their varied scale and suitably accessible locations.</p> <p>Neither the NPPF or NPPG specify an appropriate period for marketing employment sites and uses; however, the sliding scale in Policy E3 is still considered appropriate and the time periods sufficient to test the market and to allow for changes in market conditions.</p>	<p>The references in the policy and paragraph 4.4.34 to Use Classes B1a, B1b and B1c are no longer correct as these uses were replaced by Use Classes E(g)(i), (ii) and (iii) respectively in the Use Classes Order as amended September 2020. However, the description of these uses is the same in the amended Use Classes Order and is referenced in LPSS Appendix 2: Glossary, so the policy references continue to be for these uses, regardless of the change to their use class.</p> <p>The part of the Woodbridge Meadows Strategic Employment Site (Policy E3, para (4)(f)) to the south of the railway line may no longer be a suitable strategic location for industrial uses, since current employment premises there are offices and research and development uses, and there are also a number of recently developed residential/student accommodation uses within this part of the designated boundary with which any</p>
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LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
		future industrial uses would likely conflict.
Policy E4: Surrey Research Park	Policy E4 is consistent with the NPPF, Section 6 of which indicates that planning policies should proactively support economic growth and productivity, taking account of local business needs and wider development opportunities. Paragraph (4) is consistent with the requirements of Section 12 and paragraph 135 of the NPPF which indicate that development sites should be visually attractive and sympathetic to existing local character.	
Policy E5: Rural economy	The policy is consistent with NPPF para 88 which states that planning policies should enable the sustainable growth and expansion of all types of business in rural areas, through conversion of existing buildings and well-designed new buildings; support the development and diversification of agricultural and other land-based rural (including tourism and leisure) businesses; and support the retention and	The reference in paragraph (5) to Use Class A1 is no longer correct as the uses previously in this Use Class were split up in the Use Classes Order amended September 2020 into Class E(a), (b) and (c). Whilst Use Class A1 no longer exists the policy makes it clear that it is seeking to protect shops and services that provide for everyday needs in rural areas

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>development of accessible local services and community facilities.</p> <p>The reference at paragraph (4) to the sequential test for main town centre uses not being applicable to small scale rural development is consistent with NPPF paragraph 93.</p>	<p>outside of centres. Therefore, the policy references to Use Class A1 continue to be for these shops and services, regardless of the change to their use class.</p>
<p>Policy E6: The leisure and visitor experience</p>	<p>Paragraph (1) (c) is consistent with NPPF paragraph 88 c) which states that “planning policies should enable... sustainable rural tourism and leisure developments which respect the character of the countryside [i.e., rural areas].”</p> <p>The impact assessment for new leisure uses on unallocated land outside of designated centres (referenced in policy paragraph (2)) remains consistent with the NPPF (paragraph 94-95) and NPPG. The locally set threshold of 500 sqm gross floorspace above which an impact assessment is required is proportionate and consistent with NPPF paragraph 94.</p> <p>The protection for existing leisure and visitor attractions in paragraph (3) is consistent with</p>	<p>The protection for existing uses within paragraph (3) has been reduced in scope of application by the introduction of Class E into the Use Classes Order (Sept 2020), however the policy refers to the description of the uses and so these references remain relevant. Paragraphs (2 and (3) of the policy are now applied where planning permission for change of use is still required and may be applied on a case-by-case basis where planning permission is sought for operational reasons only.</p>

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>the requirement of NPPF paragraph 88 d) that planning policies should enable “the retention... of accessible local services and community facilities, such as ...sports venues, open space [and] cultural buildings.”</p>	
<p>Policy E7: Retail and leisure uses in Guildford Town Centre</p>	<p>The policy is consistent with NPPF paragraph 90, which states that planning policies should define a hierarchy of centres and promote their long-term vitality and viability, define the extent of centres and primary shopping areas, and make clear the range of uses permitted in them.</p> <p>The impact assessment for new retail and leisure uses on unallocated land outside of designated centres (referenced in policy paragraph (2)) remains consistent with the NPPF (paragraph 94-95) and NPPG. The locally set threshold of 500 sqm gross floorspace above which an impact assessment is required is</p>	<p>The references to Class A (A1-A5) uses are out of date as these uses were replaced in the Use Classes Order by Class E and sui generis uses (UCO amendment Sept 2020). However, the description of these uses is the same in the amended Use Classes Order and is referenced in LPSS Appendix 2: Glossary, so the policy references continue to be for these uses, regardless of the change to their use class.</p> <p>The policy is applied where planning permission for change of use is still required and may also be applied on a case-by-case basis where planning permission is sought for operational reasons only.</p>

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>proportionate and consistent with NPPF paragraph 94.</p> <p>The sequential test for main town centre uses (paragraph 4.4.88) also remains consistent with the NPPF (paragraphs 91-93) and NPPG.</p>	
<p>Policy E8: District Centres</p>	<p>The policy is consistent with NPPF paragraph 90, which states that planning policies should define a hierarchy of centres and promote their long-term vitality and viability, define the extent of centres, and make clear the range of uses permitted in them.</p> <p>The sequential test for main town centre uses (paragraph 3) remains consistent with the NPPF (paragraphs 91-93) and NPPG.</p> <p>The impact assessment for new retail and leisure uses on unallocated land outside of designated centres (referenced in policy paragraph (4)) also remains consistent with the NPPF (paragraph 94-95) and NPPG. The locally set threshold of 500 sqm gross floorspace above which an impact assessment is required is</p>	<p>The references to Class A (A1-A5) uses are out of date as these uses were replaced in the Use Classes Order by Class E and sui generis uses (UCO amendment Sept 2020). However, the description of these uses is the same in the amended Use Classes Order and is referenced in LPSS Appendix 2: Glossary, so the policy references continue to be for these uses, regardless of the change to their use class.</p> <p>The policy is applied where planning permission for change of use is still required and may also be applied on a case-by-case basis where planning</p>

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	proportionate and consistent with NPPF paragraph 94.	permission is sought for operational reasons only.
Policy E9: Local Centres and isolated retail units	<p>The policy is consistent with NPPF paragraph 90, which states that planning policies should define a hierarchy of centres and promote their long-term vitality and viability, define the extent of centres, and make clear the range of uses permitted in them.</p> <p>NPPF paragraphs 88 d), 96 c) and 97 a) all support the approach in E9 (10) towards retention of essential local shops and services as important community facilities.</p> <p>The sequential test for main town centre uses (paragraph (6)) remains consistent with the NPPF (paragraphs 91-93) and NPPG.</p> <p>The impact assessment for new retail and leisure uses on unallocated land outside of designated centres (referenced in policy paragraph (7)) also remains a requirement of the NPPF (paragraph 94-95) and NPPG. The</p>	<p>The references to Class A (A1-A5) uses are out of date as these uses were replaced in the Use Classes Order by Class E and sui generis uses (UCO amendment Sept 2020). However, the description of these uses is the same in the amended Use Classes Order and is referenced in LPSS Appendix 2: Glossary, so the policy references continue to be for these uses, regardless of the change to their use class.</p> <p>The policy is applied where planning permission for change of use is still required and may also be applied on a case-by-case basis where planning permission is sought for operational reasons only.</p>

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	locally set threshold of 500 sqm gross floorspace above which an impact assessment is required is proportionate and consistent with NPPF paragraph 94.	
<b>Chapter 4.5 Design Policies</b>	Left blank	Left blank
Policy D1: Place shaping	The Policy is consistent with the NPPF which set out the importance of achieving well designed places (see NPPF paragraphs 134 and 135)	



<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
Policy D2: Climate change, sustainable design, construction, and energy	The Policy is consistent with the NPPF (paras 163-165) where the policy sets out ways that new development can reduce the impact on the environment, generally supports energy efficiency and renewable/low carbon energy improvements in existing buildings and encourages resilience to the impacts of climate change.	Climate change is now an inherent part of the NPPF and is present in sections such as design and open space. The importance attributed to climate change has significantly increased since the LPSS was adopted, LPDMP Policies D14-17 respond to this by further strengthening the Council's climate change policies. LPSS Policy D2 Criteria (5), (6), (7) and (9) and have been superseded by LPDMP Policy D16 Criteria (1), (2), (3) and (4), respectively. This was to reflect changes to Building Regulations and national policy.
Policy D3: Historic environment	The Policy is consistent with and builds on the guidance/policies within the NPPF which set out the importance of safeguarding the historic environment (see NPPF paragraphs 196 & 203)	
<b>Chapter 4.6 Infrastructure Policies</b>	Left blank	Left blank

<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
Policy ID1: Infrastructure and delivery	The Policy is consistent with the NPPF including the expectation that Plans make sufficient provision for infrastructure and that this can be secured through developer contributions (see NPPF paragraphs 20b and c, and 34)	

<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
<p>Policy ID2: Supporting the Department for Transport’s “Road Investment Strategy”</p>	<p>Paragraph (1) is consistent with NPPF para 108b in considering that opportunities from proposed transport infrastructure are realised. Paragraph (2) is consistent with the NPPG on Transport evidence bases in plan making and decision taking.</p>	<p>This policy is no longer a method through which it can be determined if a Local Plan review is required, given the current trajectory of delivery. Individual assessment of sites at the point of application is considered to adequately determine cumulative impacts, in line with NPPF para 115.</p>

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
<p>Policy ID3: Sustainable transport for new developments</p>	<p>Paragraph (1) is consistent with national policy, specifically NPPF paras 108, 114.</p> <p>Paragraph (2) is consistent with national policy, specifically NPPF paras 108, 109, 114, 116.</p> <p>Paragraph (3) SPD not progressed. See Policy ID10 for proposed routing of SMC and other cycling infrastructure.</p> <p>Paragraph (4)(a) is generally consistent with NPPF para 114d, 115. Para 4(b) has been superseded by Policy ID10.</p> <p>Paragraph (5) is consistent with national policy, specifically para 114a, 109.</p> <p>Paragraph (6) is consistent with national policy, specifically NPPF paras 114 &amp; 115.</p> <p>Paragraph (7) is consistent with NPPF paras 20b, 34. Not consistent with para 110d, needs to</p>	<p>Para (1) – proposals may now go further i.e., reducing the need to travel, inclusion of micromobility options.</p> <p>Para (2) – as above.</p> <p>Para (3) - SPD has not been progressed and is not likely to be progressed. However, it is still an aspiration and need for sites close to the proposed SMC (and other walking, cycling and public transport infrastructure) to contribute to its development as part of off-site mitigation.</p> <p>Para (9) the validation list is in the process of being updated.</p> <p>Para (10) - does not align with Guildford Parking Study (2020) (did not identify a need for more public car parking) or recent town centre masterplanning work to encourage modal shift. Not favourable to promote further.</p>

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>mention Local Cycling and Walking Infrastructure Plans in preparation.</p> <p>Paragraph (8) is consistent with national policy, specifically NPPF para 34.</p> <p>Paragraph (9) is consistent with national policy, NPPF para 117 and the NPPG ‘Travel Plans, Transport Assessments and Statements’.</p> <p>Paragraph (10) the notion to dissuade cross-town vehicle trips, aiming to eliminate unnecessary congestion and further negative impact on air quality is generally in line with national policies. However, please see next column.</p>	
<p>Policy ID4: Green and blue infrastructure</p>	<p>The policy is consistent with the NPPF. It does not replicate all the issues covered by the NPPF and in certain instances provides additional policy.</p> <p>The policy requires developments to “Aim to achieve a net gain in biodiversity where appropriate”. However, in the NPPF 2023 (180) it states “Planning policies and decisions should</p>	<p>The LPDMP already goes beyond ID4 and the Environment Act by requiring qualifying schemes to achieve 20% BNG, bringing the Local Plan as a whole into compliance.</p> <p>The definition of green infrastructure at 4.6.37 has been expanded in the new NPPF to include all natural features with</p>

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>contribute to and enhance the natural and local environment by... providing net gains for biodiversity” and under the Environment Act from January 2024 BNG will be mandatory. “Aim to” and “where appropriate” may not be considered aligned with this.</p> <p>Qualifying development must achieve a 10% BNG under the Environment Act and the wording of ID4 does not make this clear.</p>	<p>benefits that now specifically include economic, health and wellbeing benefits for climate, local and wider communities and prosperity.</p> <p>The policy does not reference the statutory Local Nature Recovery Strategy however this is covered by the LPDMP.</p> <p>The NPPF (102) adds nature and climate change as potential benefits of open space, which the policy as a whole is aligned with.</p> <p>The NPPF (103c) now clarifies that loss of open space policy now also applies to a former use as well as current use.</p> <p>The supporting text refers to an 8m buffer for main rivers, which is out of alignment with the 10m now specified by the EA. This supporting text is in any case superseded by LPDMP Policy P10(5).</p>
<b>Sites</b>	Left blank	Left blank

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>Paragraph 126 of the NPPF states that:            Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:</p> <p>a) it should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and</p> <p>b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.</p> <p>Annual reviews are undertaken as part of the Land Availability Assessment. This assesses sites' suitability, availability and deliverability/developability. Whilst site</p>	

LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>allocations are in principle considered suitable for the use that they are allocated for; a further detailed consideration will be undertaken as part of the planning application process. As part of any update to the plan, consideration will need to be given to any sites which are as yet substantially unimplemented to determine whether they are still suitable for the use identified and whether they should be re-allocated in the new plan.</p>	
<b>Appendices</b>	Left blank	Left blank
Appendix 1: Housing Trajectory	<p>The Housing Trajectory is updated annually as part of the Council’s Land Availability Assessment which informs the five year land supply position.</p>	
Appendix 2: Glossary	<p><b>A uses:</b> Use Classes A1-A3 of the Use Classes Order 1987 (as amended) were subsumed within Use Class E in amendments to the Order</p>	



in September 2020, whilst Use Classes A4 and A5 were reclassified as sui generis.

**Affordable Housing:** The entry includes all the affordable products referred to in Annex 2 of the NPPF and is therefore consistent with the NPPF. First Homes – which the NPPG now covers – are a form of discounted market housing and sold at a minimum discount of 30% against market value (therefore ‘at least 20% below market value’), and thus covered by the existing LPSS Appendix 2 definition.

**B uses:** Use Classes B1(a), B1(b) and B1(c) were replaced by Use Classes E(g)(i), E(g)(ii) and E(g)(iii) respectively in amendments to the Use Classes Order in September 2020.

**Entry-level exception site:**

New wording from NPPF 2023 in red: ‘update to paragraph 73’

**Green Infrastructure:** The definition is consistent with the NPPF, but with omissions in detail. The LPSS defines it as “a network of multi-functional green space” which the NPPF 2021 extends to “blue spaces and other natural features”. The LPSS refers to the “wide range of environmental and quality of life benefits for

	<p>local communities” which the NPPF 2021 extends to “a wide range of economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity”. Notably, the NPPF 2021 adds economic benefit to the social and environmental benefit identified in the LPSS glossary, which the LPDMP is consistent with where it references natural capital and ecosystem services.</p> <p><b>Habitat Regulations Assessment (HRA):</b> The LPSS refers to the Habitats Directive. The NPPF 2021 replaces the directive with references to the Conservation of Habitats and Species Regulations 2017.</p> <p><b>Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA):</b> This refers to the European SEA Directive but should now refer to the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p><b>Local Transport Plan (LTP)</b> “Under the Transport ... Surrey County Council’s Local Transport Plan is called the ‘Surrey Transport Plan’ <u>Local Transport Plan (LTP4)</u>.”</p> <p><b>Older people</b></p>	
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LPSS Chapter / Policy	Consistency with the NPPF / NPPG?	Other comments
	<p>New wording from NPPF 2023 in red: ‘People over <u>or approaching</u> retirement age...’</p> <p><b>Sustainable transport modes</b> Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, <del>low and ultra-low emission vehicles</del>, car sharing and public transport.</p> <p><b>Traffic calming</b> Works to slow down <del>and/or discourage</del> motor traffic. These may include road humps, rumble strips, raised sections of road known as tables and “gateways” at the entrance to settlements.</p>	
Appendix 3: Maps showing 500m Catchment of Public Transport Interchange		Would be more effective as isochrone along available routes.

<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
Appendix 4: Evidence of active and comprehensive marketing	The NPPF does not specify how Local Plans should deal with the loss of employment sites, local shops and services that provide for everyday needs, tourism and visitor and cultural uses, but maintains the importance of developing and retaining these uses. Appendix 4 provides a more detailed framework of criteria for assessing the evidence of marketing required by LPSS policies E3, E5, E6 and E9, and LPDMP Policies ID7 and ID8, for planning applications that would result in their loss.	

<p>Appendix 5: Hierarchy of retail and service centres and Guildford Town Centre shopping frontages</p>	<p>The first part of Appendix 5 (Hierarchy of retail and service centres) is consistent with the NPPF, in particular paragraph 90, which sets out that planning policies should define a hierarchy of town centres and promote their long-term vitality and viability; define the extent of town centres and primary shopping areas and make clear the range of uses permitted in such locations; retain and enhance markets; allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed looking at least 10 years ahead; and recognise that residential development often plays an important role in ensuring the vitality of centres.</p> <p>The second part of Appendix 5 (Guildford Town Centre shopping frontages) refers to primary and secondary frontages, which have been removed from the NPPF. Nevertheless, their inclusion in the LPSS remains consistent insofar as they are used to make clear the range of retail and other uses appropriate in certain parts of the town centre.</p>	
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<b>LPSS Chapter / Policy</b>	<b>Consistency with the NPPF / NPPG?</b>	<b>Other comments</b>
Appendix 6: Infrastructure Schedule	The infrastructure schedule published in the LPSS was a snapshot in time based on the best available evidence. All schemes listed will need to be reappraised in light of the most recent evidence and any changed circumstances as part of the planning application process to understand what supporting infrastructure is necessary to support planned growth.	

## Appendix 3: PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1 - LOCAL PLAN REVIEW ASSESSMENT

### Why you should use this part of the toolkit

The following matrix will assist you in undertaking a review of policies within your plan to assess whether they need updating.

The matrix is intended to supplement the National Planning Policy Framework (NPPF) (paragraph 33 in particular) and the associated National Planning Practice Guidance on the review of policies within the plan. Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in addressing the specific local issues that are identified the plan. This in turn will then help you to focus on whether and to what extent, an update of your policies is required. We would recommend that you undertake this assessment even if your adopted local plan already contains a trigger for review which has already resulted in you knowing that it needs to be updated. This is because there may be other policies within the plan which should be, or would benefit from, being updated.

This part of the toolkit deals only with local plan review. Part 2 of the toolkit sets out the content requirements for a local plan as set out in the NPPF. Part 3 of the toolkit outlines the process requirements for plan preparation set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Part 4 of the toolkit.

### How to use this part of the toolkit

Before using this assessment tool it is important that you first consider your existing plan against the key requirements for the content of local plans which are included in the Planning and Compulsory Purchase Act 2004 (as amended); The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the most up to date NPPF, PPG, Written Ministerial Statements and the National Model Design Code. To help you with this **Part 2 of the toolkit** provides a checklist which sets out the principal requirements for the content and form of local plans against the

relevant paragraphs of the NPPE. Completing **Part 2 of the toolkit** will help you determine the extent to which your current plan does or does not accord with relevant key requirements in national policy. This will assist you in completing question 1 in the assessment matrix provided below, and in deciding whether or not you need to update policies in your plan, and to what extent.

To use the matrix, consider each of the statements listed in the “requirements to consider” column against the content of your current plan. You will need to take into consideration policies in all development plan documents that make up your development plan, including any ‘made’ neighbourhood plans and/ or any adopted or emerging Strategic Development Strategy. For each statement decide whether you:

- Disagree (on the basis that your plan does not meet the requirement at all);
- Agree (on the basis that you are confident that your current plan will meet the requirement)

Some prompts are included to help you think through the issues and support your assessment. You may wish to add to these reflecting on your own context.

Complete all sections of the matrix as objectively and fully as possible. Provide justification for your conclusions with reference to relevant sources of evidence where appropriate. You will need an up to date Authority Monitoring Report, your latest Housing Delivery Test results, 5 year housing land supply position, any local design guides or codes and the latest standard methodology housing needs information. You may also need to rely on or update other sources of evidence but take a proportionate approach to this. It should be noted that any decision not to update any policies in your local plan will need to be clearly evidenced and justified.

**How to use the results of this part of the toolkit**

The completed assessment can also be used as the basis for, or as evidence to support, any formal decision of the council in accordance with its constitution or in the case of, for example, Joint Planning Committees, the relevant Terms



of Reference in relation to the approach to formal decision-making, as to why an update to the local plan is or is not being pursued. This accords with national guidance and supports the principle of openness and transparency of decision making by public bodies.

	<b>Matters to consider</b>	<b>Agree / Disagree / Other</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A</b>	<b>PLAN REVIEW FACTORS</b>		
<b>A1.</b>	<p><b>The plan policies still reflect current national planning policy requirements.</b></p> <p><b>PROMPT:</b></p> <p>As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the ‘content’ requirements of the current NPPF, PPG, Written Ministerial Statements and the National Model Design Code (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Mainly agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence):</b></p> <ul style="list-style-type: none"> <li>• LPSS prepared and examined under transitional arrangements and NPPF 2012</li> <li>• Changes to the Use classes order in particular new Class E are significant and likely to impact on retail and office policies.</li> <li>• The Government intends to introduce plan-making reforms in Autumn 2024 with a requirement that all local planning authorities replace existing local plans by preparing ‘new style’ local plans. Part 2 of the toolkit relates to the existing NPPF which is expected to change. It will be necessary to assess the extent to which</li> </ul>

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	<b>Matters to consider</b>	<b>Agree / Disagree / Other</b>	<b>Extent to which the local plan meets this requirement</b>
			existing policies accord with national policy following the introduction of the new plan-making system.
<b>A2.</b>	<p><b>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</b></p> <p><b>PROMPT:</b></p> <p>Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing</p>	Disagree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>• Present Standard Method is significantly higher (779 dwellings per annum) than the housing requirement in the LPSS, which is set out under LPSS Policy S2 as 562 dwellings per annum over the plan period (2015-2034).</li> </ul>

	<b>Matters to consider</b>	<b>Agree / Disagree / Other</b>	<b>Extent to which the local plan meets this requirement</b>
	<p>requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.</p>		
<b>A3.</b>	<p><b>You have a 5-year supply of housing land</b></p> <p><b>PROMPT:</b></p> <p>Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book.</p>	Agree	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>• Currently able to demonstrate a 5YHLS and HDT.</li> </ul>

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
A4.	<p><b>You are meeting housing delivery targets</b></p> <p><b>PROMPT:</b></p> <p>Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>	Agree	<ul style="list-style-type: none"> <li>• The Council has moved from having to provide a 20% buffer to a 5% buffer in April 2020 when calculating the 5YHLS based on the results of the Housing delivery Test. This has contributed to our ability to demonstrate a robust and healthy 5YHLS.</li> <li>• The ability to maintain this (both with the LPSS figure and the Standard Method figure when this is applicable after 5 years) will depend largely on the progress and delivery of the strategic sites. It is important to note that there is a considerable time lag from when a planning application is permitted, particularly if only an outline permission, to when it is actually delivering housing completions. Any delays to planning permissions, particularly on the larger strategic sites, will have a significant impact on the short term delivery of homes and the ability to maintain a rolling five year supply.</li> </ul>

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 71</p> <p><b>A5.</b></p>	<p><b>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.</b></p> <p><b>PROMPT:</b></p> <p>Use (or update) your Authority Monitoring Report to assess delivery.</p>	<p>Mainly agree</p>	<ul style="list-style-type: none"> <li>• Affordable housing delivery remains at a relatively low level however it is envisaged that this will increase significantly when the strategic sites begin delivering</li> <li>• The LPDMP includes a policy on First Homes</li> <li>• The majority of the commercial and retail need has not been delivered yet. This needs to be reassessed in light of the changes to the economy and the scale of the need following COVID. Recent evidence provided re retail need in relation to a planning application indicated a significant fall in retail need from the figure used in the 2019 LP.</li> </ul>

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
<p><b>A6.</b></p>	<p><b>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</b></p> <p><b>PROMPT:</b></p> <p>A key employer has shut down or relocated out of the area.</p> <p>Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which</p>	<p>Disagree</p>	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>• An updated assessment of employment needs is required as there has likely been significant changes since the plan was adopted.</li> <li>• There is uncertainty regarding the appetite to provide the allocated employment space of the strategic sites.</li> <li>• Applicants have been claiming lack of demand for strategic office facilities in part as a result of the increase of working from home.</li> <li>• The Employment policies do allow for marketing evidence to be provided in support of changes of use.</li> </ul>

	<b>Matters to consider</b>	<b>Agree / Disagree / Other</b>	<b>Extent to which the local plan meets this requirement</b>
	<p>have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>		

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
<p><b>A7.</b></p>	<p><b>There have been no significant changes affecting viability of planned development.</b></p> <p><b>PROMPT:</b></p> <p>You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	<p>Mainly agree</p>	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>• The LPDMP is supported by a Viability Study. This has re-assessed the viability implications of the LPSS requirements to understand what headroom is available to support the requirements in the LPDMP. This concludes that the cumulative requirements of both plans do not threaten the overall delivery of the Local Plan.</li> <li>• Viability concerns at planning application stage tend to be limited to sites with abnormal costs.</li> <li>• The impacts on viability of the significant changes in interest rates and inflation have not been considered through the recent plan making process.</li> </ul>



	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 75</p> <p><b>A8.</b></p>	<p><b>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</b></p> <p><b>PROMPT:</b></p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.</p>	<p>Mainly agree</p>	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>• The strategic sites are key to providing housing and commercial development. Their delivery has been slower than originally anticipated.</li> <li>• There is uncertainty regarding the impact of the cancellation of the A3 scheme. Work is underway with GBC, SCC and National Highways to consider alternative transport improvements in relation to the A3.</li> <li>• The A3/M25 DCO is currently under construction.</li> </ul>

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
<p><b>A9.</b></p>	<p><b>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</b></p> <p><b>PROMPT:</b></p> <p>You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would/could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to</p>	<p>Mainly agree</p>	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>• The LPDMP contains further policies on heritage and environmental (climate change and biodiversity)</li> <li>• There is ongoing work with the Environment Agency in relation to a Guildford Town Centre Flood Alleviation Scheme.</li> <li>• There is a new Air Quality Management Area in Guildford town centre. The LPDMP includes a policy on air quality.</li> <li>• Natural England is currently undertaking a review of the Surrey Hills National Landscape boundary which is expected to increase the extent of it within GBC. This may have consequential impacts that would need to be addressed as part of the update to the LPSS.</li> </ul>

	<b>Matters to consider</b>	<b>Agree / Disagree / Other</b>	<b>Extent to which the local plan meets this requirement</b>
	<p>Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>		

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
<p><b>A10.</b></p>	<p><b>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</b></p> <p><b>PROMPT:</b></p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	<p>Agree</p>	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>• There has been some windfall development in Guildford town centre and the inset villages however they accord with the LPSS spatial strategy. The number of additional homes gained has compensated for the delays to the strategic sites with more now anticipated to deliver post the plan period.</li> </ul>

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 79</p> <p><b>A11.</b></p>	<p><b>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</b></p> <p><b>PROMPT:</b></p> <p>You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact</p>	<p>Mainly agree</p>	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>• Relocation of the Sewage Treatment Works to facilitate the delivery of WUV is on track</li> <li>• The need for new secondary schools is being assessed by SCC however the LPSS provides for this re-assessment.</li> <li>• The Ash Road Bridge is under construction.</li> <li>• See above (A8) regarding the cancellation of the A3 scheme and commencement of the A3/M25 Junction 10 improvements</li> </ul>

	<b>Matters to consider</b>	<b>Agree / Disagree / Other</b>	<b>Extent to which the local plan meets this requirement</b>
	upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.	-	

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	<b>Matters to consider</b>	<b>Agree / Disagree / Other</b>	<b>Extent to which the local plan meets this requirement</b>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 81</p> <p><b>A12.</b></p>	<p><b>All policies in the plan are achievable and effective including for the purpose of decision-making.</b></p> <p><b>PROMPT:</b></p> <p>Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan’s strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	<p>Agree</p>	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>• LPSS contains mainly strategic policies</li> <li>• The LPDMP provides further clarity/detail</li> <li>• The policies have been found to be robust through the appeal process over the last 5 years with a high success rate.</li> <li>• The new plan-making system proposes to introduce a set of national development policies which must not be replicated by local DM policies.</li> </ul>

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
<p><b>A13.</b></p>	<p><b>There are no recent or forthcoming changes to another authority’s development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</b></p> <p><b>PROMPT:</b></p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> <li>● Review emerging and adopted neighbouring authority development plans and their planning context.</li> <li>● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan.</li> <li>● Review any relevant neighbourhood plans</li> <li>● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on</li> </ul>	<p>Agree</p>	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>● In terms of LPAs within our immediate housing market area – both have reviewed their strategic plans and concluded that new updated Local Plans should be prepared. Both authorities have a local housing need figure through the standard method that is higher than that adopted in their most recent strategic plans.</li> </ul>



	<b>Matters to consider</b>	<b>Agree / Disagree / Other</b>	<b>Extent to which the local plan meets this requirement</b>
	<p>your plan - discuss this with the relevant authorities.</p> <ul style="list-style-type: none"> <li>● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs.</li> </ul>		

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
<p><b>A14.</b></p>	<p><b>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</b></p> <p><b>PROMPT:</b></p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> <li>● Review any manifesto commitments and review the corporate and business plan.</li> <li>● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority.</li> <li>● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration</li> </ul>	<p>To be explored further</p>	<p><b>Reason (with reference to plan policies, sections and relevant evidence sources):</b></p> <ul style="list-style-type: none"> <li>● Renewed emphasis regarding exploring the potential development opportunities on brownfield land and progress with a flood alleviation scheme to unlock future growth in the town centre.</li> </ul>

	<b>Matters to consider</b>	<b>Agree / Disagree / Other</b>	<b>Extent to which the local plan meets this requirement</b>
	strategies and so on.		

	<p><b>ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES</b></p>	<p><b>YES/NO (please indicate below)</b></p>	
<p><b>A15.</b></p>	<p><b>You AGREE with <u>all</u> of the statements above</b></p>	<p><b>No</b></p>	<p><b><u>If no</u> go to question A16.</b></p> <p><b><u>If yes</u>, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</b></p> <p><b>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision</b></p>

			not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	Yes	If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.
A17.	<p><b><u>Decision:</u> Update plan policies</b></p> <p><b>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached): See Section 7 of the committee report</b></p> <p><b>Other actions that may be required in addition to or in place of an update of plan policies: None</b></p>		
	<b>B. POLICY UPDATE FACTORS</b>	<b>YES/N O (please indicate below)</b>	<b>Provide details explaining your answer in the context of your plan / local authority area</b>

B1	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.	Unsure	Whilst the current standard method result for Guildford borough is significantly higher than the LPSS housing requirement, an update to the standard method by Government is anticipated in 2025. We cannot be sure what the new standard method figure will be for Guildford borough, nor whether there are exceptional circumstances that could justify a different figure, or alternatively that the new standard method figure cannot be met locally. This would need to be tested through examination.
B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.	No	The spatial strategy based on the spatial hierarchy remains robust in terms of directing development to the most sustainable locations in the first instance.
B3	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.	Unsure	All LPSS sites that have not yet been commenced will need to be reassessed as part of the update process and meet the requirements for inclusion within the new Local Plan.
	You have answered yes to one or more questions above.		You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.

	<p>You have said no to <u>all</u> questions (B1 to B3) above</p>		<p>If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.</p>
<p>B4</p>	<p><b>Decision: Full Update of Plan Policies</b></p> <p><b>Reasons for scope of review: The Government intends to implement planning reform which will alter plan-making requirements and ‘new style’ plans will be necessary from autumn 2024. This changed context weighs in favour of a full update to the LPSS (in the form of a ‘new style’ Local Plan). It is considered prudent to set the scope of any update (or new style plan) in the context of confirmed emerging updates to national legislation, policy, and guidance as it relates to plan-making.</b></p>		
<p><b>Date of assessment:</b></p>	<p>12 January 2024</p>		

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**Appendix 4: Duty to Cooperate (DtC) responses summary**

<b>Statutory body</b>	<b>Summary points</b>
Environmental Agency	<ul style="list-style-type: none"> <li>• Lists topics EA expect any Local Plan should cover.</li> <li>• Regarding any further LP update, advice to focus on updating evidence base i.e., SFRA level 1 and 2 and the Water Cycle Study.</li> </ul>
Historic England	<ul style="list-style-type: none"> <li>• Do not consider (other than National Policy and Guidance) that there are any strategic issues or changes in circumstance that fall within their purview of historic policy advice that should be taken into account at this time.</li> </ul>
National Highways	<ul style="list-style-type: none"> <li>• No specific comments other than providing several links to documentation to take account of in review. [These are likely more relevant to any update process].</li> </ul>
Natural England	<ul style="list-style-type: none"> <li>• No changes in circumstance / strategic issues that should be taken into account as part of the reviewing process.</li> </ul>
<b>County / Neighbouring Councils</b>	<b>Summary points</b>
Mole Valley DC	<ul style="list-style-type: none"> <li>• MVDC’s stage in the plan-making cycle precludes it from being able to take unmet housing need. Even if MVDC were at an earlier stage in the plan preparation cycle, it would be unable to meet unmet housing need from other authorities.</li> <li>• Continue to engage on cross boundary matters.</li> </ul>
Rushmoor BC	<ul style="list-style-type: none"> <li>• Consider that the following cross-boundary duty-to-cooperate matters may require further engagement going forward: Housing need and housing supply; Employments needs and economic development; Infrastructure; The Thames Basin Heaths Special Protection Area; Gypsies, Travellers and Travelling Showpeople; Major sites of more than local significance.</li> </ul>
Surrey County Council	<ul style="list-style-type: none"> <li>• Current Policy H1 does not include any mechanism to ensure that specialist forms of accommodation come forward. Review [Update] should address how the sufficiency of specialist housing delivery will be assessed and what remedial action will be taken if required.</li> </ul>

	<ul style="list-style-type: none"> <li>• Once the revised Surrey Hills AONB boundary is established, consideration will be needed as to whether there should be continued protection of AGLV land not designated AONB, for example through local landscape designation.</li> <li>• Updates to PPG on Flood Risk and Coastal Change (e.g. change in definition of functional floodplain) and the Environment Agency’s Climate Change Allowances Guidance should be considered.</li> <li>• Regarding the economy, much of the evidence base is older and prior to the COVID pandemic, which has resulted in changing work patterns for many with more hybrid working and increased online shopping. National policy has also seen the creation of new use classes and further changes to permitted development rights. Local impacts will need to be understood as part of plan-making.</li> <li>• Any update process to consider evidence on net zero and SCC Healthy Streets for Surrey Design Code as supporting document.</li> <li>• Consideration if need for additional early years provision [in any update].</li> <li>• [Any update to] consider SCC’s Local Transport Plan 4 (LTP4) and Local Nature Recovery Strategy (to be developed).</li> <li>• LPSS only makes mention of the old Surrey Waste Plan 2008, and the review should consider the need to update reference to the SWP at the first available opportunity.</li> <li>• Request new and updated local plans be subject to HIA and to include policies requiring certain developments to be informed/accompanied by an HIA.</li> </ul>
Surrey Heath BC	<ul style="list-style-type: none"> <li>• Borough will continue to be constrained and face challenges regarding meeting housing needs in the Borough.</li> <li>• No significant cross boundary issues arising from focus of spatial strategy regarding transport or infrastructure improvements.</li> </ul>
Waverley BC	<ul style="list-style-type: none"> <li>• Undertaking comprehensive update to Local Plan covering both strategic and non-strategic policies.</li> </ul>

	<ul style="list-style-type: none"><li>• Waverley unlikely to be able to meet any unmet needs from neighbouring authorities. May need to work together to assess the impact of higher housing numbers.</li><li>• Necessary for Waverley and Guildford to work together, with Surrey County Council and National Highways, to manage any potential impact of development on the A3.</li></ul>
Other	<ul style="list-style-type: none"><li>• None received at time of writing.</li></ul>