

BNG Capacity in Guildford

1 Introduction

1.1 Following the question posed on Day 1 of the hearing sessions by the Inspector, this note provides a simple, and highly conservative (i.e. assuming a greater number of off-site credits than considered to be necessary), estimate of the amount of offsite Biodiversity Net Gain (BNG) credits that will be needed to deliver the growth strategy included in the Local Plan: Strategy and Sites (LPSS). The following site typologies contribute towards the identified site supply within the LPSS:

- Sites allocated in the LPSS (sites of approx. 25 or more units);
- Land Availability Assessment sites not specifically allocated in the LPSS (sites between 5 and approx. 25 units); and
- Windfall sites (trend-based assumption for sites of less than 5 units)

2 Assumptions and limitations

2.1 BNG is highly contingent on baseline conditions and is therefore very site specific. The following assumptions are used to calculate an indicative need for offsite credits for different typologies:

- Major brownfield sites will likely be able to provide a full 20% BNG onsite (demonstrated by the Stantec BNG sites study and the example planning applications provided in the Matter 3 statements). Brownfield sites with a high biodiversity baseline may not achieve a 20% BNG onsite but given the high development pressure in the area most brownfield sites are unlikely to have been left undisturbed long enough to develop a high baseline.
- Strategic sites with bespoke SANGs are likely to be able to accommodate greater levels of BNG than other greenfield sites due to the large amount of BNG compatible uses within their application boundaries (e.g. SuDS, open space, landscaping, amenity land and SANG). The Former Wisley Airfield (application) and Weyside Urban Village (outline permission) with its associated SANG at Burpham Court Farm will both provide in excess of 20% BNG and are assumed to need no further offsite credits. Blackwell Farm and Gosden Hill Farm are proposing SANGs that include areas of woodland which may not be able to accommodate significant gains. We therefore apply a conservative assumption that the sites will be similar to Keens Lane in the BNG sites study (though Keens Lane is a smaller site with no SANG), and that they will therefore achieve 'no net loss' on site and 20% gain through offsite measures.
- The Guildford Cathedral application is proposing a 1% gain (slightly above 'no net loss') so the Keens Lane scenario has also been applied to this site.
- For non-strategic greenfield sites, some will be able to provide the full 20% BNG onsite and some will not. The BNG sites study, and the examples of applications set out in the Matter 3 statement, indicate that the level of variation will be large, ranging from around a 50% loss

on constrained sites with a high starting baseline (as in the Clockbarn Nursery example in the BNG sites study) to a net gain over 100% in a best case (as in the Orchards Farm real world example).

- The Stantec BNG sites study indicates that in a worst-case greenfield scenario (a high biodiversity baseline with constraints on site layout as in the Clockbarn Nurseries example), a 50% loss of biodiversity units onsite could result, and the lost value plus 20% BNG would need to be provided offsite. In order to set out a very conservative worst case, we have assumed all non-strategic greenfield sites will require this proportion of offsite provision. However, it should be noted that this is most unrealistic as some greenfield sites will be able to achieve the full BNG onsite, sometimes exceeding the 20% by a significant margin.

2.2 Based on the above:

- brownfield sites are assumed not to need offsite credits.
- strategic sites and Guildford Cathedral¹ are assumed to achieve 'no net loss' (but no gain) on site. The Keens Lane 'no net loss' scenario required 3.49 credits per 140 homes which equates to 0.024 credits per house.
- Non-strategic greenfield sites are assumed to suffer a loss of 50% biodiversity onsite. The Clockbarn Nursery scenario provided 75 homes and needed 7.4 credits in total to achieve a 20% BNG. This equates to around 0.1 credits per house.

2.3 It is assumed that the BNG credit needs of commercial developments will fall within the significant buffers included in the very conservative calculations in this document.

2.4 Only area habitat credits have been considered and not credits for hedgerow and river habitats as these are highly site specific.

3 Potential Housing Supply Identified in the 2021 LAA

3.1 The most recent publication of the LAA was in December 2021. This LAA is base dated to April 2021 and the document sets out the land that is available and suitable to meet the Borough's housing and employment needs. Within this some sites have since been completed and/or gained permission and therefore will not require 20% BNG. This has been accounted for below.

4 Remaining housing Supply

4.1 A significant amount of the development in the LPSS has already been consented and/or delivered and therefore will not be subject to any BNG standard. The Land Availability Assessment (LAA) sets out the housing supply for the next 15 years (including beyond the plan period to 2036).

¹ A planning application for 124 dwellings at the Guildford Cathedral site (21/P/02333) is pending determination

Table 1: Potential number of dwellings per delivery period identified in the LAA 2021.

Location	Number of dwellings (net) per delivery period			
	1-5 years	6-10 years	11-15 years	Total
Town Centre	327	736	120	1,183
Guildford urban area	510	2,164	1,908	4,582
Ash and Tongham	0	246	240	486
Villages	678	324	19	1,021
Previously Developed Land Inset from Green Belt	0	116	0	116
New Settlement	0	850	1,150	2,000
Student Accommodation (C3 Equivalent)	0	0	36	36
Care Homes (C3 Equivalent)	0	56	0	56
Rural exception	18	30	30	78
Windfall	250	500	500	1,250
Total	1,783	5,022	4,003	10,808

5 Housing supply by location in the Borough

Town centre

- 5.1 Over the next 15 years the Town Centre area is identified to deliver **1,183 dwellings** across nine sites.
- 5.2 All of the nine are considered brownfield and following the assumptions in Section 2 it is anticipated these sites will achieve the full 20% BNG onsite.
- 5.3 In summary, the Town Centre dwellings are assumed to require **0 offsite credits**

Guildford urban area

- 5.4 Over the next 15 years Guildford urban area is identified to deliver **4,582 dwellings** across 11 sites.
- 5.5 Of the 11 sites, eight are considered brownfield and following the assumptions in Section 2 it is anticipated these sites will achieve the full 20% BNG onsite. The exceptions are the strategic sites of Gosden Hill and Blackwell Farm, and the site at the Cathedral.
 - Gosden Hill is expected to deliver approximately 1,350 dwellings within the next 15 years
 - Blackwell Farm is expected to deliver approximately 1,500 dwellings within the next 15 years

- Guildford Cathedral is expected to deliver approximately 93 dwellings² within the next 15 years

5.6 As noted in Section 2, it is assumed that these sites may not provide a full 20% BNG onsite. Assuming they achieve no net loss but no net gain, out of the **2,943 dwellings** it is assumed that the need for offsite credits will be **70.6 credits** (Keens Lane scenario).

Ash and Tongham

5.7 Over the next 15 years the Ash and Tongham area is identified to deliver **486 dwellings** at the following sites:

- Works, Poyle Road, Tongham
- Land to the south and east of Ash and Tongham

5.8 The site at Poyle Road is brownfield and it is therefore following the assumptions in Section 2 it is considered that the 20% BNG can be delivered onsite.

5.9 Since the publication of the 2021 LAA, 186 dwellings have been permitted at the 'Land to the south and east of Ash and Tongham' site. This leaves **290 dwellings** to be delivered on the site. As noted in Section 2, it is assumed that these sites may not provide a full 20% BNG onsite.

5.10 Consequently, assuming a loss of 50% biodiversity on site, out of the **290 dwellings** it can be assumed that the need for offsite credits will be **29 credits** (the Clockbarn Nursery scenario).

Villages

5.11 Over the next 15 years the Villages across the Borough are identified to deliver **1,021 dwellings** across 21 sites.

5.12 Since the publication of the 2021 LAA a number of the sites above have received planning permission and other sites currently have applications under consideration, for clarity these sites are set out below.

- **Land to the west of West Horsley.** Since the publication of the 2021 LAA this site has achieved full planning permission (20/P/02067) and therefore BNG will not be required for the 138 approved dwellings.
- **Land at Garlick's Arch, Send Marsh.** Since the publication of the 2021 LAA this site has achieved planning permission through hybrid planning permission (19/P/02223) and full planning permission (19/P/02191) and therefore BNG will not be required for the 550 approved dwellings.
- **Land to the north of West Horsley.** Since the publication of the 2021 LAA part of the site has achieved full planning permission (21/P/00917) and therefore BNG will not be required for the 35 approved dwellings. A planning application was submitted for the remaining dwellings on the site in August 2022 but taking a conservative approach the

² A planning application for 124 dwellings at the Guildford Cathedral site (21/P/02333) is pending determination

Council assume BNG will need to be provided for these dwellings using the approach outlined in Section 2.

- 5.13 When considering the up-to-date evidence with the three sites above, it is possible to remove 723 dwellings that have received planning consent from the 1,021 dwellings expected to deliver BNG in the villages in the next 15 years.
- 5.14 Consequently, assuming a loss of 50% biodiversity on site, out of the **298 dwellings** it can be assumed that the need for offsite credits will be **30 credits** (the Clockbarn Nursery scenario).

PDL

- 5.15 In the 2021 LAA Previously Developed Land sites are identified to deliver **116 dwellings** over the next 15 years. However, since publication of the 2021 LAA the single PDL site is no longer considered available for development. Therefore, 116 dwellings will be removed from the overall supply of 10,808 dwellings identified in the 2021 LAA for the next 15 years, resulting in an overall supply of **10,692 dwellings**.

New Settlement

- 5.16 Over the next 15 years New Settlements across the Borough are identified to deliver **2,000 dwellings** at the following sites:

- Former Wisley Airfield

- 5.17 This scheme is proposing an excess of 20% BNG onsite so will need **0** offsite credits.

- 5.18 Note: it is acknowledged that the representative for Hallam Land, which owns Bridge End Farm (a separate land ownership within the Wisley new settlement boundary) stated that their development would not benefit from the proposed BNG units provided by the main part of the site. However, given the highly conservative assumption, it is anticipated that this deficit can be absorbed by the significant buffer included in the calculations, even if the landowner cannot reach an agreement with Taylor Wimpey over the sharing of spare BNG credits.

Student Accommodation

- 5.19 Over the next 15 years Student Accommodation is identified to deliver **36 dwellings** at one site:

- The University of Law, Braboeuf Manor, Portsmouth Rd, Guildford

- 5.20 Consequently, assuming a loss of 50% biodiversity on site, out of the **36 dwellings** it can be assumed that the need for offsite credits will be **3.6 credits** (the Clockbarn Nursery scenario).

Care Homes

- 5.21 Over the next 15 years Care Homes are identified to deliver **56 dwellings** at one site:

- Former Wisley Airfield

5.22 This care home will form part of the aforementioned new settlement which is proposing an excess of 20% BNG onsite so will need **0** offsite credits.

Rural Exception

5.23 Over the next 15 years Rural Exception sites are expected to deliver **78 dwellings** across the Borough.

5.24 Consequently, assuming a loss of 50% biodiversity on site, out of the **78 dwellings** it can be assumed that the need for offsite credits will be **7.8 credits** (the Clockbarn Nursery scenario).

Windfall Sites

5.25 Over the next 15 years Windfall sites are expected to deliver **1,250 dwellings** across the Borough. These will be a mixture of brownfield and greenfield sites; a very conservative approach has been taken to assume these will all be greenfield sites and therefore the calculations from the Clockbarn Nursery scenario have been applied.

5.26 Consequently, assuming a loss of 50% biodiversity on site, out of the **1,250 dwellings** it can be assumed that the need for offsite credits will be **125 credits** (the Clockbarn Nursery scenario).

6 Total

6.1 In total the number of dwellings and offsite credits that are estimated to required to deliver the 10,808 homes in the next 15 years are set out in the table below:

Area of the Borough	Number of dwellings	Number of dwellings where offsite credits are required	Quantum of offsite biodiversity credits required
Town Centre	1183	0	0
Guildford Urban Area	4582	2943	70.6
Ash and Tongham	486	290	29
Villages	1021	298	30
PDL	0	0	0
New Settlement	2000	0	0
Student Accommodation	36	36	3.6
Care Homes	56	0	0
Rural Exception	78	78	7.8
Windfall	1250	1250	125
Total	10692	4895	266

7 BNG credit supply

7.1 The Stantec Tyting Baseline Study describes the feasibility of additional uplift in biodiversity value and determines that providing a modest uplift in biodiversity value through habitat management and creation would result in the creation of (+) 141.3 Biodiversity Units (area habitats) to be used

as a “Habitat Bank”. Under the very conservative assumptions used in this scenario, the Tyting habitat bank alone would provide around 53% of the need for BNG credits over the period to 2036 and would be significantly greater than the need in the first 5 years of the LAA 2021. It is a pilot scheme and other habitat banks are likely to follow.

7.2 In addition to Tyting habitat bank, the borough contains a number of opportunities for further habitat banks including:

- 142 hectares of existing SANG land (council and privately owned).
- 104 hectares of additional proposed SANG (privately owned).
- Other council owned Open Space (e.g. fringes of parks, amenity green space).
- Around 2,200 hectares of Common Land owned primarily by Surrey County Council.
- Spare biodiversity units provided by strategic developments at Weyside Urban Village/Burpham Court Farm, Former Wisley Airfield and other developments that achieve a BNG greater than 20%.
- Other private land not in economic use e.g. National Trust Land, private estates.
- Environment Bank and Environmental Trading Platform clients.
- National habitat banks of last resort are proposed by the government.