

Examination of the Guildford Development Management Policies
Additional Statement: Matter 3 Biodiversity in New Developments
Response to Guildford Borough Council
Hallam Land Management Limited

1. This Statement has been prepared on behalf of Hallam Land Management Limited. This responds to the additional information submitted to the Inspector by Guildford Borough Council in respect of Matter 3 - Biodiversity Net Gain in new developments.

Timing of Tyting Farm

2. We welcome this additional evidence setting out how the scheme at Tyting Farm can assist in delivering offsite credits. A timeline for implementation of this scheme should be provided if the Council are seeking to adopt this policy earlier than the national approach of the Environment Act.
3. Without evidence that this scheme will be in place prior to the potential adoption of this policy there risks situations of schemes being unable to seek offsite credit through the Council. This is discussed further in our Hearing Statement.

Brownfield Sites

4. It is concerning that a general assumption for brownfield sites has been taken, whereby it is assumed these are not left long enough to establish a high baseline.
5. Following the approach on greenfield sites it is recommended a more conservative approach is taken for brownfield sites, rather than a generalisation of all brownfield having a low baseline.
6. It would be reasonable to assume a proportion of these lie vacant for a prolonged period of time so that they regenerate and have a higher baseline, thus requiring a varied approach to the ability of the scheme to achieve net gain on site.

Wisley New Settlement

7. We are pleased to see the identification of the Former Wisley Airfield as an application for part of the allocation, rather than the whole allocation.
8. As stated during the Examination, Hallam are currently preparing their planning application for the land adjacent to Ockham Lane. Contrary to what is stated in the Council's evidence this is not the land at Bridge End Farm, which is owned by the Harris family. A different application is being prepared for that land, and should be identified separately from both the Hallam parcel and the Former Wisley Airfield application.
9. Table 1 presents the timescales for delivery of housing in Guildford across a 15 year period.

10. We do not agree that no housing will be delivered as part of the Wisley New Settlement within the next 5 years there.
11. Within Taylor Wimpey's planning application (application reference: 22/P/01175) and previously in their Scoping Report they have assumed to start completing houses in 2025.
12. Hallam are expecting to begin delivering housing in 2025. Therefore, the Wisley New Settlement will be delivering housing within the first 5 years.
13. Paragraph 5.18 of the Council's evidence sets out that the Hallam lands BNG deficit can be absorbed by the credits. Hallam presume that the Council are suggesting that this could be included within the offsite credit bank at Tyting Farm. It is requested that the Council confirm this.
14. Clarification on this would be useful, to fully understand how the Council plan to approach the remaining parcels of the Wisley New Settlement.

Offsite Credit Bank Mechanism

15. Although this additional information is welcomed, there needs to be evidence on what mechanism will be used for Applicant's to secure this. Until the timescales are clearly set out there is no reassurance that there will be appropriate measures in place for Applicants should the potential early adoption of this policy occur.
16. If this is not set up it leads to the uncertainty of the delivery of sites across the Borough.

Summary

17. The ability for this one offsite credit bank to deliver the amount established in the Council's evidence is reassuring. We agree that whether this policy is adopted or not, once the transition period ends and the statutory 10% requirement is in effect there will be further local and national offsite credit banks coming forward.
18. In the meantime, is it crucial to understand the Council's timescales for this scheme, how they are approaching the Wisley New Settlement in terms of delivery timescales and the remaining parcels of the allocation, and how Applicant's can secure their offsite credits at Tyting Farm.
19. At this time Hallam maintain their objection to a 20% policy requirement and believe that instead, there should be conformity with the national approach. However, whether the 20% is adopted or not, offsite credit banks will be fundamental to the delivery of schemes across the Borough.

Kate Coventry MRTPI
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