



Pre Planning Application Assessment Report

Leas Road, Guildford, GU1 4QT

This scheme is for outline planning permission for demolition of existing buildings, erection of an office building (Use Class E), including car and cycle parking.

This project got planning approval.
Surrey Planning 23/P/02138

Pre Planning Application Research by Draw Plans Architectural Design Studio
www.drawplans.uk

Pre-Planning Feasibility Assessment – Bus Depot Site, Leas Road, Guildford, GU1 4QT

Site Context: The proposal is for a new office development (mix of 1-2 storey buildings) on the former bus depot site at Leas Road, Guildford. The site (~0.38 ha) is brownfield land in Guildford town centre, bounded by Mary Road and lying adjacent to the River Wey. It is part of the urban area and was previously occupied by bus garage structures and hardstanding. Notably, the site lies partly within flood zones 2 and 3 (medium to high flood risk) and has experienced past flooding. The surrounding context includes commercial uses and infrastructure (the railway and bus station nearby) and the river corridor. This assessment examines key feasibility considerations – biodiversity net gain, ecology, heritage, archaeology, flood and environmental risks, trees, and drainage – to inform a fresh planning application.



Figure: View of the former bus depot site at Leas Road (Mary Road entrance). The brownfield site is mostly hardstanding and a large garage building, offering opportunities for regeneration and environmental enhancement.

Biodiversity Net Gain (BNG) Feasibility Assessment

Baseline Ecological Value: As a long-utilized bus depot, the site's current ecological value is likely very low. The land is predominantly covered by buildings, paving, and hard surfaces with little to no green space. Any existing vegetation is limited to small patches of ruderal weeds or scrub at site margins. This low baseline biodiversity means there is minimal habitat value at present, a situation common for such urban

brownfield sites. A recent Guildford study found that a brownfield site with very low initial habitat value “more than easily met and exceeded both a 10% and 20% Biodiversity Net Gain target” through relatively modest habitat creation. In other words, because the starting point is so low, even small improvements (like adding planting or greenspace) can yield large percentage gains in biodiversity units.

10% Net Gain Requirement: Under the Environment Act 2021, all new developments in England must achieve at least +10% biodiversity net gain relative to the pre-development value. This legal requirement (coming into force for Town & Country Planning Act projects by late 2023) means the project must leave biodiversity in a measurably better state than the baseline. The 10% uplift is calculated using DEFRA’s Biodiversity Metric tool, comparing habitat *area* and *quality* before vs. after development. In practice, a Biodiversity Gain Plan will need to be prepared, detailing how onsite habitats will be created or enhanced and how any losses are compensated. Given the anticipated low baseline, achieving the mandatory +10% net gain on this site appears feasible. Indeed, local policy discussions in Guildford have even considered a 20% net gain target for certain developments, noting that the provision of relatively modest new habitat on a low-value brownfield site can vastly exceed a 10% gain. The development should aim to maximize on-site enhancements first, which will not only meet policy but also contribute to a better local environment.

On-Site BNG Measures: To deliver net gains, the design can incorporate new green infrastructure and habitat features. For example:

- **Landscape Planting:** Create areas of native species-rich planting (wildflower meadows, pollinator-friendly shrubs) around the site perimeter or in pocket gardens. Even small landscape strips or a riverside green buffer will add habitat units.
- **Trees and Green Cover:** Plant native trees or tree groups on site (where space allows) and consider green walls/trellises on building facades. A green roof or biodiverse roof on the 1-2 storey buildings would also significantly increase habitat area without using ground space.
- **Riverbank Enhancement:** If the site boundary extends to the river or a riverside strip is within control, enhancing the riparian habitat is valuable. Invasive weeds can be removed and replaced with native bankside plants or wetland features to support aquatic ecology.
- **Wildlife Features:** Integrate specific features like bird nesting boxes, bat

boxes (if foraging habitat exists nearby), insect hotels, and log piles in landscaped areas. These improve habitat quality (“distinctiveness”) and help achieve additional net gain credits in the metric.

Using the DEFRA metric 4.0, the project ecologist will calculate baseline habitat units (likely very low, given most is “developed land, sealed surface”) and then forecast post-development units with the above enhancements. The goal is to show at least 110% of the baseline units will be delivered (i.e. 10% net gain). Given the baseline may be near zero, achieving 110% is not onerous – for instance, a single pocket park or green roof could create more habitat value than the entire existing site. This indicates BNG on-site is feasible. The design team should follow the mitigation hierarchy – first avoid or minimize harm to any existing ecological assets (e.g. avoid unnecessary vegetation clearance), then mitigate impacts, and finally compensate/enhance habitats.

Off-Site Compensation: In the event that site constraints limit the amount of habitat creation (for example, if building footprint and parking needs leave little open space), the law and guidance allow for off-site biodiversity gains to make up the shortfall. The developer can explore partnering with off-site land where new habitat can be created (e.g. through the Surrey Wildlife Trust’s Biodiversity Offset schemes or local habitat banks) or, as a last resort, purchase government “biodiversity credits.” Any off-site gain must be secured for at least 30 years (via a conservation covenant or planning obligation) and registered on Natural England’s biodiversity gain register. However, off-site compensation should be considered only after exhausting on-site possibilities (the BNG framework prioritizes on-site delivery where possible). Given the small scale of this project, it is likely possible to meet the 10% net gain on-site or with minimal off-site units, especially as similar Surrey case studies show low-value brownfield projects can exceed 10% net gain with minimal habitat additions.

Guidance and Best Practice: The project should be guided by DEFRA’s published BNG guidance and use the Statutory Biodiversity Metric calculator as required by the latest regulations. Surrey Wildlife Trust (SWT) – which provides ecological planning advice in the county – also offers resources on achieving BNG. Surrey County Council’s planning guidance emphasizes that BNG “must be demonstrated” and integrated from the early design stage, not left as an afterthought. In summary, with proactive ecological design, the proposal can likely achieve the required +10% biodiversity net gain, either entirely on-site or through a combination of on-site measures and off-site contributions. Early engagement of an ecologist to produce a Preliminary Ecological Appraisal (PEA) and BNG calculation is recommended to inform the site layout. This will ensure the planning application includes a feasible

BNG plan showing compliance with the Environment Act 2021 net gain condition.

Surrey Wildlife Trust Considerations (Local Ecology & Designations)

Local Ecological Designations: The Leas Road bus depot site sits along the River Wey corridor, which is an important ecological feature in Guildford. In fact, the adjacent river and its banks are designated as a Site of Nature Conservation Importance (SNCI) (a non-statutory Local Wildlife Site) due to the habitat they provide. The site effectively borders the SNCI on its eastern side (and possibly southern extent), meaning there are existing valued habitats immediately adjacent. The River Wey and connected wetlands (such as the nearby Wey Navigation and floodplain meadows) support wildlife including fish, birds, bats, and invertebrates. Surrey Wildlife Trust, which often manages or monitors local SNCIs, will be keen to ensure any development does not harm these habitats. There are also statutory designated sites in the broader area – notably the Thames Basin Heaths Special Protection Area (SPA) – but the SPA is over 400 m away (the site lies in the 400 m–5 km zone of influence). The SPA is primarily a consideration for new residential developments (due to recreational pressure on heathlands), so for an office scheme it should not be directly impacted (no significant residential population). Nonetheless, the presence within the SPA buffer means consultation with Natural England may be triggered, even if only to confirm no significant effect. More immediately, Surrey Wildlife Trust’s interest will be in the riverine habitat. The Trust (and the council’s Ecology Officer) will likely expect a buffer zone along the river to be maintained or enhanced for wildlife. As detailed later in the Environment Agency section, an undeveloped 8 m buffer from the top of bank is typically required for the Wey. This buffer overlaps with the SNCI and should be treated as a protected ecological zone. No buildings or hard structures should encroach into this buffer; instead, it can be used for soft landscaping with native species. SWT often advises using such buffers to strengthen wildlife corridors. The use of native planting in the buffer (e.g. native trees, meadow grasses, marginal aquatic plants) will connect the site’s landscaping to the broader habitat network. Additionally, lighting design must be sensitive – for example, avoiding light spill onto the river – to not disturb nocturnal species (SWT and the EA typically request no new lighting in the 8 m river buffer to protect bats and other fauna).

Protected Species: Due to the current industrial nature of the site, high-value species presence is likely limited. However, Surrey Wildlife Trust will hold records of any notable species in the vicinity via the Surrey Biodiversity Information Centre. As

part of feasibility, a data search can be done to see if bats, otters, water voles, or other protected species have been recorded along this stretch of the Wey or in the immediate area. Some considerations include:

- **Bats:** The existing bus depot building is a large, corrugated metal shed from 1932 (rebuilt in 2002), which likely has minimal roosting opportunities (steel structure, brightly lit, active use). Nonetheless, bats are known to forage along rivers. The development should avoid removing any mature trees along the river (which could have roost features) and keep the river corridor dark. If any building demolition or tree removal is planned, bat surveys may be prudent to confirm the absence of roosts. Bat boxes could be installed on retained trees or new buildings to provide roost sites as enhancement.
- **Otters / Water Voles:** These species occur on the Wey in more rural sections. In central Guildford, constant human activity makes them less likely, but not impossible. Otters have been gradually recolonizing many English rivers. A survey of the riverbank by an ecologist for burrows, spraints, or footprints could be done. Development should ensure the riverbank structure and vegetation are not adversely affected; ideally, it should improve habitat (e.g. by planting and not using harsh lighting or fencing that blocks wildlife movement).
- **Birds:** The river and any scrub vegetation may host common birds. Any vegetation clearance should avoid the nesting season (generally March–August) or be preceded by a nesting bird check. Opportunities to install bird nesting boxes (e.g. for swifts, house sparrows or robins, depending on habitat) can be part of the BNG measures.
- **Reptiles/Amphibians:** Unlikely on a mostly paved site, but any rough grass or rubble piles could occasionally shelter common reptiles (slow worms) or amphibians. A precautionary approach (vegetation strimming protocol) can mitigate this if any such habitat exists on site edges.

Consultation and Guidance: Early consultation with Surrey Wildlife Trust is recommended. SWT often acts as a consultee for planning applications, providing expert feedback on ecological reports. They may advise on how to achieve net gain in alignment with Surrey’s Local Nature Recovery strategies. Surrey Wildlife Trust’s own guidance on Biodiversity Net Gain urges developers to go beyond the 10% minimum where possible and target local conservation priorities. For example, if there are local plans to enhance the Wey corridor or create new wetlands, an off-site contribution to those via SWT could be beneficial. The development should also

check for any nearby Local Nature Reserves (LNRs) or priority habitats. (Guildford's Riverside Nature Reserve is upstream along the Wey; while not adjacent, ensuring no downstream pollution or runoff from the site is important for such reserves.)

In summary, the site's interface with the River Wey SNCI is the primary ecological concern. By maintaining a generous green buffer by the river, using native landscaping, and incorporating wildlife enhancements, the project can align with Surrey Wildlife Trust's objectives. SWT will likely support the scheme if it demonstrably contributes to local biodiversity (through BNG) and protects the integrity of the river habitat. All ecological measures and any species surveys should be documented in an Ecological Impact Assessment (EIA) submitted with the planning application. This will provide evidence that the proposal complies with national and local biodiversity policies (e.g. NPPF 180, Guildford Local Plan policies on Green Infrastructure) and has addressed the SWT's consultation advice for protecting local wildlife assets.

Historic England & Heritage Asset Impact

Heritage Context: The site is located near Guildford's historic town centre, although the immediate surroundings on Leas Road/Mary Road are more modern light industrial in character. There are no designated heritage assets on the bus depot site itself – the depot building is not listed and not of special architectural merit (it was a functional bus garage). However, the broader area has important heritage features. Notably, Guildford Town Centre Conservation Area extends across parts of the town including the riverside. According to local planning documents, the site is either *within* or directly opposite the Town Centre Conservation Area boundary (the exact line may run along the river). In any case, development here will affect the setting of the conservation area, meaning design and materials should preserve or enhance the area's character. Historic England (the statutory consultee for heritage) will be interested in any impacts on the conservation area vistas or nearby listed buildings.

Nearby Listed Buildings: Within a few hundred meters, there are several listed buildings and historic structures. For example, *Dapdune Wharf* to the north-east (on the opposite bank of the Wey) is a historically significant inland dockyard, with Grade II listed buildings (18th–19th century bargemen's cottages, workshops, etc.) as part of the River Wey Navigation's heritage. Guildford's town centre to the south-east has numerous listed buildings (e.g. along North Street and the High Street), though these are somewhat separated by distance and urban blocks. The local plan notes the site is in close proximity to some Grade II listed buildings on its east side. This could refer to historic buildings across the river (such as structures at Dapdune Wharf or Walnut

Tree Close) or possibly the edge of the Bedford Wharf area. Additionally, the Electric Theatre (a converted early 20th-century building by the river) and the old railway Walnut Tree viaduct are nearby heritage features.

Given this context, the proposed 1-2 storey office buildings are relatively low-rise and likely subdued in scale, which helps limit their impact on views. Key considerations include:

- **Conservation Area Setting:** If the site is deemed within or adjacent to the conservation area, any new construction must be sensitive to the “character and appearance” of that area as required by law. The riverside aspect of the conservation area is characterized by open space, vegetation, and glimpses of historically modest-scale structures along the water. The development should avoid a design that appears too bulky or out-of-place when viewed from across the river or from the Mary Road bridge. Use of materials could reflect the industrial heritage (for instance, brick facades or pitched roof elements to nod to warehouse forms) rather than overly modernist designs that clash. Historic England will encourage high-quality, contextually appropriate architecture here.
- **Listed Building Impact:** Even if not directly adjacent, the massing and height of the new buildings should be considered in relation to sightlines of any nearby listed buildings. For example, will the new office block obstruct or photobomb views of St Nicolas’ Church spire or Guildford House (Grade I, albeit that one is up on High Street far away)? Likely not, given the low height. However, one identified risk in a prior proposal was blocking a potential “sustainable movement corridor” by building too close to the river – ensuring some open space along the bank could have heritage as well as urban design benefits, keeping the sense of a riverside open corridor which is an aspect of the area’s historic townscape.
- **Archaeology vs. Built Heritage:** (Archaeology is covered in the next section but note that any below-ground remains related to historic industry might also be considered part of heritage.)

Historic England’s role will be mainly advisory unless scheduled monuments or Grade I/II* assets are directly affected (none are on site). The project should include a Heritage Statement assessing the significance of the conservation area and any listed buildings nearby and evaluating how the development’s design addresses them. For example, the heritage statement can confirm that building heights are kept low to remain in line with surrounding rooflines, that setbacks from the river maintain

historic open space, and that any views from public vantage points (like the river towpath) are preserved or enhanced. It should also reference how the scheme might improve the area – e.g. by replacing a utilitarian depot with a more attractive building and landscaping, thereby enhancing the riverside environment which is currently somewhat blighted by hardstanding.

Potential Impacts and Mitigation: Potential heritage impacts to guard against include harming the character of the conservation area (through inappropriate design or materials) and harming the setting of listed buildings (through visual intrusion or loss of historical linkage to the river). The mitigation measures would be:

- **Sympathetic Design:** Use a design code that respects the historic context (perhaps breaking up the mass into smaller building elements to echo traditional plot widths, using a pitched roof or articulated roofline rather than a flat monolithic roof, and choosing a brick or stone palette that complements Guildford's vernacular).
- **Height and Massing Controls:** Keep the office buildings at 2 storeys maximum, which is in line with or lower than many historic buildings nearby. Avoid a large 5-storey block (as a previous outline application proposed) that could dominate – the current proposal's lower height is beneficial in this respect.
- **Riverside Enhancements:** Convert the currently utilitarian riverside edge into a landscaped area accessible (perhaps visually) to the public. This could reveal more of the river and celebrate the historic connection Guildford has with the Wey. Historically, this area had wharfs and meadows; while it will now be offices, adding interpretive signage or at least integrating the development with the riverside path (if feasible) could be positive.
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- **Views:** Ensure that the profile of new buildings doesn't block any important sightlines. For example, someone walking along the river or standing at Mary Road bridge – the new structures should not obscure key landmarks. A visual impact assessment with renderings may be prepared to confirm this.

Overall, with careful design, the heritage impacts should be manageable. The site is already developed, and replacing a 20th-century bus garage with a thoughtfully designed office can be seen as an improvement if done right. The planners will consult Historic England if necessary (likely only if the conservation area impact is substantial), but by demonstrating a commitment to preserving the area's character, the application can satisfy Local Plan heritage policies and Section 72 of the Listed

Buildings & Conservation Areas Act (which requires preserving/enhancing conservation areas). In conclusion, proximity to heritage assets is noted but not prohibitive – it mainly calls for a sensitive approach in architectural style and site planning rather than any show-stopping constraint.

Archaeological Assessment

Archaeological Potential: The site lies in an area of high archaeological sensitivity, given Guildford's long history. The council's records classify it as within an "Area of High Archaeological Potential". This designation typically covers the historic core of the town and riverside, where there is potential for finds or features from past periods. While the exact use of this particular plot in antiquity is not well documented in public sources, we can infer possibilities:

- The River Wey has been a focus of human activity for centuries (navigation, mills, wharfs). It's possible the site was part of Guildford's post-medieval industrial riverside. In the 17th–19th centuries, areas along the Wey were used for wharfage, timber yards, or other commercial uses supporting the navigation. Any remains of old wharf structures, boats, or related artifacts could be buried along the river edge.
- Prior to that, Guildford's medieval town was centred a bit further south (around the High Street and castle). The site is just outside the medieval core but could have been floodplain or peripheral land with some activity. The possibility of waterlogged deposits exists near the river – these can preserve organic material (wood, leather) that would be of archaeological interest.
- In more ancient times, river valleys often attracted prehistoric activity (for example, Mesolithic or Neolithic artifacts near waterways). There's a lesser but non-zero chance of prehistoric flint tools or Roman-period items in the general vicinity.

Given the site has been heavily disturbed by 20th-century construction (bus garage, hardstanding, likely utilities), some archaeological layers may have been truncated. However, significant remains can survive beneath modern fill. The Surrey County Council Archaeological Officer will likely require a systematic approach to ensure no important heritage is lost unrecorded.

Required Surveys/Works: At pre-planning or planning stage, an Archaeological Desk-Based Assessment (DBA) should be carried out. This involves a specialist

reviewing historical maps, records, the Historic Environment Record (HER) data, and any previous finds in the area. The DBA will establish a baseline of known heritage (e.g., if there was a known 19th-century industrial building on site or if any archaeological finds have been logged nearby).

Based on the DBA's findings and the high potential rating, it is very likely that the planning authority will impose a condition or request for archaeological field evaluation. Typically, this would mean undertaking trial trenching on site (small exploratory trenches excavated to check for archaeological layers). Since the site is largely covered by existing structures, such evaluation might occur either in any open areas or post-demolition and pre-construction.

If significant remains are found (for example, foundations of an 18th-century wharf or earlier artifacts), one of two paths will be taken:

- **Preservation in Situ:** If the remains are of very high importance (which is less expected here, since known nationally important remains are unlikely on this brownfield), designs might be tweaked to preserve them underground. For instance, foundations might be redesigned (using piling instead of mass excavation) to avoid disturbing an archaeological layer.
- **Preservation by Record:** More commonly, the remains will be excavated and recorded by archaeologists before construction. This would be secured via a planning condition. The condition would require a Written Scheme of Investigation (WSI) detailing how a full excavation or watching brief will take place. A team of archaeologists would then dig and document any finds, producing a report for the HER.

Known Constraints: At present, there is no evidence of scheduled monuments or highly significant archaeological features on the specific site – if there were, it would have been highlighted (and Historic England scheduling would bring strict protections). The castle, for instance, is well away. The "Area of High Archaeological Potential" designation is more of a flag that unexpected finds could occur, and due diligence is needed.

One must also consider archaeology in the river itself. If any works involve the riverbank (say enhancing it or creating an outfall), the possibility of encountering submerged or buried timbers from historic wharfs is there. The WSI should include methods to deal with waterlogged contexts (maybe involvement of a geoarchaeologist if deep alluvial sequences are present).

Mitigation and Impact on Development: Archaeology is unlikely to be a showstopper for development here, but it will require time and resources to address. The development program should allow for archaeological evaluation and any excavation before main construction. This can typically be done in the window after demolition of existing structures and before groundworks for new foundations begin. The cost of archaeology (consultants, possible digs) should be factored in. It is much better to do a planned investigation than to have unplanned discoveries during construction that force work stoppages.

The planning authority, guided by the county archaeologist, will ensure a suitable planning condition (e.g. "No development shall commence until a programme of archaeological work has been implemented..."). Complying with this will satisfy NPPF Chapter 16 (Conserving the historic environment) and Local Plan policies requiring assessment of archaeological heritage.

In conclusion, an archaeological feasibility summary: The site warrants an archaeological assessment and likely some fieldwork, given its location in a historically rich area. There may be moderate potential for post-medieval industrial remains tied to Guildford's River trade. Proper investigation will record any such heritage. There is no indication of archaeology that would prevent development; rather, it is a matter of compliance and recording. Thus, from a planning feasibility standpoint, archaeology is a manageable constraint with standard mitigation (survey and excavation) expected. The development team should engage an archaeological consultant early to scope out the works and liaise with Surrey's Heritage officers.

Environment Agency Considerations (Flood Risk, Contamination, Watercourse)

This site triggers several Environment Agency (EA) related considerations due to its location and past use. Key issues include fluvial flood risk management, potential land contamination, and proximity to a main river (the Wey) which imposes constraints and responsibilities.

Flood Risk (Fluvial and Surface Water): A significant portion of the site lies within Flood Zone 2 and 3 of the River Wey, meaning it has a medium to high probability of flooding (Zone 3 typically $\geq 1\%$ annual chance). In fact, Guildford Borough's records note a history of flooding on part of the site. Any planning application must be accompanied by a Flood Risk Assessment (FRA), as required by the National Planning Policy Framework (NPPF) for sites in Zone 2/3. The FRA will need to demonstrate:

- **Appropriate Use:** Offices are classified as “Less Vulnerable” in flood risk terms (as per the Planning Practice Guidance vulnerability categories). Less Vulnerable uses are generally acceptable in Zones 2 and 3a *provided* that flood risk is mitigated. (They are not permitted in Zone 3b “functional floodplain”. We should verify if any part of the site is functional floodplain – likely not, since it’s previously developed and behind some defences, but the FRA should clarify this).
- **Sequential Test:** The council will need to consider the Sequential Test – basically, directing development to areas of lower flood risk where possible. However, since this is a brownfield *town centre* site allocated for redevelopment, it likely passes the Sequential Test by virtue of strategic need (there are limited alternative sites outside floodplain for such development in the centre). The Exception Test is not required for Less Vulnerable uses in Zone 3a (only for Highly Vulnerable uses).
- **Flood Mitigation:** The new buildings must be designed with flood resilience. Likely strategies: set the finished floor levels (FFL) of offices above the known flood levels (EA can provide the 1% + climate change flood level for the Wey here). If raising floor levels is not fully possible (since a 1 in 100-year flood plus climate change might be a meter or more above ground), then ensure critical infrastructure (electricals, etc.) is raised and use flood-resistant construction for lower parts (e.g. concrete floors, sacrificial materials up to flood line). The FRA might propose that ground floor uses be more flood-tolerant (e.g. parking or lobby) with offices on upper floor, but since this is only 1-2 storey, perhaps the approach will be just to build in robustness.
- **No Increase in Flood Risk Elsewhere:** The development must not worsen off-site flooding. This means no loss of floodplain storage – if the building footprint is in flood zone and displaces floodwater, the design should compensate by creating storage (for example, undercroft voids or lower landscaped areas that water can fill). Also, surface water runoff (see SuDS section) must be controlled so as not to exacerbate downstream flooding. The Guildford draft Local Plan explicitly states that any redevelopment of the depot must “take account of flood risk and ensure redevelopment does not increase flood risk on site or elsewhere”. This will be a key principle in the FRA.
- **Safe Access/Egress:** The FRA will consider if there is a safe dry escape route during floods. Mary Road/Leas Road may themselves flood in extreme events, so the plan might designate a refuge area on upper floor or an evacuation procedure if needed. This is usually acceptable for offices (workers can

evacuate with warning or temporarily shelter upstairs if roads are cut off, given they are daytime use).

It is expected that the EA will be a statutory consultee on the application due to the proximity to the main river and the flood zone. They will review the FRA. Historically, for a nearby riverside project, the EA has required strict adherence to providing an 8m undeveloped buffer and ensuring building floor levels are above the flood level. Complying with these will likely address the EA's main concerns. If any flood defences exist along this stretch, the development must not compromise them and may need an EA *Flood Risk Activity Permit* for works near the river.

Contamination Risks: The site's long use as a bus depot raises concerns about soil and groundwater contamination. Typical contaminants expected include hydrocarbons (diesel, petrol, oils), polycyclic aromatic hydrocarbons (PAHs), lubricants, heavy metals from vehicle maintenance, possibly solvents, and even localised spills from fuel storage tanks if any were on site. Guildford's Land Quality records have flagged a "risk of contamination" for this parcel. The Environment Agency (and the Council's Environmental Health team) will require a Phase 1 Geo-Environmental Desk Study to be submitted, assessing the site's history and potential pollutant linkages. This should be followed by a Phase 2 Intrusive Investigation (boreholes, soil sampling, groundwater monitoring) to characterize contamination levels.

Key points on contamination feasibility:

- **Sensitive Receptors:** The River Wey adjacent is a sensitive receptor for any contaminants leaching out. If the soil or groundwater is polluted (e.g., with BTEX from fuel or metals), there is a risk of migration to the river. The development must ensure that construction does not worsen any plume and that the final site does not continue to pollute. The EA will particularly be concerned with any pollution of controlled waters (the Wey).
- **Remediation:** It is very feasible to remediate such a site, but it requires proper planning. Depending on test results, remediation might involve excavating hotspots of contaminated soil (e.g., around any former fuel tanks or wash-down areas) and disposing off-site, or in-situ methods like soil stabilization. Groundwater might need pumping/treatment if significantly contaminated. All this can be done under a remedial strategy approved by the Council/EA.
- **Construction Considerations:** During works, the site should have pollution prevention measures (bunds, silt traps) to ensure no oily runoff enters the

Wey. If piling is required for foundations, an assessment should check that piling won't drive contaminants deeper (EA may request a *Piling Risk Assessment* if shallow groundwater contamination is present, to avoid creating pollutant pathways).

- **Validation:** After remediation, a verification report will be needed showing the site is safe for use (especially important if workers will be in contact with soil or if landscaping is introduced – we must ensure no harmful exposure to residual contamination). For an office development (commercial use), the risk threshold is a bit less strict than for residential/garden uses but still must be protective of human health and environment.

In summary, contamination is a constraint but a manageable one. The planning permission will almost certainly come with conditions requiring a detailed site investigation and a remediation scheme to be approved. The developer should budget for soil remediation as part of site prep. The EA will review any proposals affecting groundwater. Ensuring a thorough cleanup not only is legally required but also aligns with the site's sustainable redevelopment – turning a polluted depot into a clean, safe office site.

Watercourse & Biodiversity Constraints: Being directly adjacent to the River Wey (a Main River), the development must respect certain byelaws and guidelines:

- **8 Metre Easement:** The Environment Agency typically requires an 8m buffer zone measured from the top of the riverbank where no buildings, fences, or other obstructions should be placed. This easement allows access for maintenance of the watercourse and provides a wildlife corridor. The current site likely already has hardstanding closer than 8m in spots, but any new design should, if possible, pull back and create that buffer as green open space. As noted earlier, submitted plans for another local project showed the 8m buffer landscaped with native species in accordance with EA requirements. We should do the same – e.g., a strip of land along the river (which may double as a floodable zone) left undeveloped except for soft landscaping. If any minor development is needed in that zone (for instance, a drainage outfall or a riverside footpath), it will require explicit EA consent.
- **Flood Defence Consents:** Any works within the floodplain or near the river (like altering ground levels, installing outfall structures, etc.) will require permits from the EA. Early discussions with the EA through their Pre-Application service can clarify what is permissible. For instance, if we want to improve the riverbank (maybe replace a concrete bank with a more natural

sloped edge, if within site control), the EA would likely welcome it if done properly (as it improves habitat). Conversely, extending hard development closer to the river would be frowned upon.

- **Water Quality and Drainage:** The EA will look at how surface water is discharged. Direct discharge to the river is possible but must be controlled (and of good quality). Incorporating Sustainable Drainage Systems (SuDS) that treat runoff (e.g. permeable paving, bio-retention planters) will help remove pollutants like oils before water reaches the Wey. An oil interceptor might be required for parking areas as a safety measure, although SuDS can often play that role.
- **Biodiversity Duty:** The EA, under the Water Framework Directive and other policies, aims to improve rivers. They will encourage that the development does not encroach but rather enhances the riparian habitat. The 8m buffer being free of lighting and kept vegetated is one request they've made on other schemes. We should plan to include that in our proposals (no floodlights spilling onto the river at night, etc.). During construction, measures must be in place to avoid any silt or contaminants entering the water (this will likely be addressed in a Construction Environmental Management Plan condition).

Summary of EA-Related Feasibility: The site's redevelopment is feasible from an EA perspective provided these issues are addressed:

- A robust Flood Risk Assessment demonstrating safe development with no off-site detriment. Designing to accommodate the floodplain (e.g., raising floor levels, not blocking flow) will likely meet EA and council approval.
- A thorough Contamination Assessment and remediation plan to ensure the site (and river) are not polluted by past or future activities.
- Compliance with river buffer requirements and obtaining necessary permits for any work near the Wey.
- Inclusion of SuDS and water quality protections (which we detail in the next section).

There are no known EA showstoppers like active landfill or highly hazardous uses on site. In fact, relocating an old bus depot out of the floodplain and replacing it with a carefully planned office that respects the river can be seen as reducing long-term environmental risk. The key will be to engage proactively with the EA during planning, heed their advice (which often comes as consultation responses), and incorporate all necessary mitigation into the proposal. With that, the project should

satisfy both EA regulations and local flood/contamination policies, enabling it to proceed through planning.

Arboricultural Assessment & Tree Protection

Existing Trees: An initial survey of the site and its boundaries will identify any trees on or adjacent to the site. Given the site's current use as a depot, it has very little established vegetation on-site. A review of site imagery suggests a few mature trees just outside the site perimeter (for example, along the riverbank or near neighbouring plots) and possibly some small self-seeded trees or shrubs at the fringes of the yard. Guildford's planning documents did not list any notable tree constraints within the depot (unlike some sites where Tree Preservation Orders (TPOs) are mentioned, none were highlighted for this site) – implying no protected trees stand directly on the parcel. However, we must confirm if any nearby trees are subject to Tree Preservation Orders or if the site being in a conservation area gives automatic protection to trees on it. If indeed the site falls within the Town Centre Conservation Area, then any tree above 75mm diameter at 1.5m height is protected (requiring notice to the council for works) by default. Thus, even scrubby trees could have planning protection. A qualified arboriculturist should visit the site to catalogue all trees within and immediately around the site, including species, sizes, and health.

Potential Tree Impacts: Depending on site layout, the development could affect trees in several ways:

- **Trees along the Riverbank:** Often there are willows, alders, or other riparian trees lining the Wey. These provide screening and habitat. The design intends to leave a buffer, so ideally these trees remain. Construction must ensure their root zones are not compacted or cut by any new foundations or landscaping changes.
- **Trees at Site Edges:** If there are street trees on Mary Road or neighbours' trees whose roots overhang into our site, excavation or level changes could harm them. For example, if a neighbour's mature tree has roots extending under the fence, digging for a new building or drainage could sever roots.
- **New Landscaping:** Conversely, the development plan likely includes planting new trees to enhance amenity and BNG. The placement of new trees must consider underground constraints (utilities, drainage) and space for canopy growth.

Arboricultural Assessment: A BS 5837:2012 compliant Tree Survey and Arboricultural Impact Assessment (AIA) will be required with the application. According to British Standard 5837 (Trees in Relation to Design, Demolition and Construction), the local planning authority has a duty to consider the protection and planting of trees when granting planning permission. The report will grade each tree (Category A = high quality, B = moderate, C = low, U = remove) and show their root protection areas (RPAs) on a plan. The design should then be informed by this: ideally, all Category A and B trees should be retained and protected.

If any valuable tree is unavoidably impacted (for instance, if an existing tree sits exactly where new access must go), the impact assessment will justify removals and propose mitigation planting. However, given the likely scarcity of existing trees, the focus will be on retaining whatever is there, unless they are poor condition.

Tree Protection & Method Statement: The project will need an Arboricultural Method Statement (AMS) describing how trees to be retained will be safeguarded during demolition and construction. This includes erecting sturdy tree protection fencing around RPAs before any site work begins and specifying special construction techniques if work must occur near roots (e.g. using no-dig construction for a path within a root area, hand-digging any trenches that encroach an RPA, not storing materials or fuelling machines under tree canopies, etc.). For example, if a new parking area overlaps with the root zone of an off-site oak, the AMS might call for a permeable, no-dig pavement system that avoids root cutting and allows water/air to the roots.

Local authorities treat tree protection seriously as a material consideration. A planning condition will likely require that the development proceeds in accordance with the submitted tree protection plan, with monitoring by an arborist at key stages. Non-compliance can lead to enforcement, especially if a protected tree is damaged or removed without consent.

Opportunities for New Trees: The development can greatly improve the greening of the site. Introducing new tree planting is not just an aesthetic choice but can also help with BNG and SuDS (trees assist in stormwater uptake). The landscape plan might include small-to-medium native trees like field maple, birch, or ornamental trees appropriate for an urban riverside environment. Care should be taken to choose species that won't outgrow the space or conflict with buildings in the future. The council may have guidance on preferred species for urban planting (and Surrey Wildlife Trust would favor natives for biodiversity). Planting should also account for soil conditions post-remediation (using good quality topsoil in pits, etc.).

Summary: Arboriculturally, the site has no major tree cover at present, but whatever trees exist around must be identified and protected. The feasibility of development is not hindered by trees – rather, the development is an opportunity to introduce greenery. As long as an appropriate tree survey and protection plan are implemented, the scheme can comply with policy requirements to safeguard trees. Indeed, local and national policy expect that planning decisions account for existing trees (protected or not) as a material consideration and aim for net gains in tree cover where possible. The project will deliver on this by retaining boundary trees, observing the required root protection measures, and planting new trees to enhance the site.

From a risk perspective: there are no Tree Preservation Orders known on site, so no formal consent is needed for removal unless a tree is in the conservation area or gets a TPO during planning (unlikely if none high quality there now). Community or neighbour interest in trees might not be high given the area, but providing some lush landscaping could gain goodwill. In conclusion, Arboricultural issues are straightforward to manage through standard survey and design integration. The planning submission should include: the tree survey/AIA, a tree protection plan, and a landscape scheme. With these in place, tree-related constraints will be fully addressed.

Sustainable Drainage (SuDS) Feasibility

Drainage Requirements: In redeveloping this brownfield site, the aim will be to implement a Sustainable Drainage System (SuDS) to handle surface water runoff in a way that mimics natural processes. National and local policy now makes SuDS mandatory for all developments – indeed Surrey County Council as Lead Local Flood Authority states that SuDS are required on all planning applications in line with the NPPF. A conventional connection of all drains to the sewer is no longer acceptable without considering sustainable alternatives. The new development must demonstrate that it will manage rainwater on-site as much as possible, ensuring no increase in flood risk and ideally improving water quality of discharges.

Existing Drainage Context: Currently, as a bus depot, the site is likely almost entirely impermeable (roof and asphalt). Rainfall probably goes into a network of gullies and underground drains, possibly discharging to the river or into the public sewer. We should verify if there is an existing outfall to the Wey or if it all runs to the combined sewer under the road. Regardless, the redevelopment is a chance to reduce runoff rates and volumes compared to this existing scenario. The goal should be to achieve greenfield runoff rates if feasible, or at least a significant betterment

over the current situation.

SuDS Strategy Options: Given the site conditions (flat brownfield next to a river), possible SuDS components include:

- **Infiltration-based SuDS:** These would include soakaways, infiltration trenches, or permeable paving that lets water percolate into the ground. However, infiltration feasibility depends on soil permeability and groundwater levels. Being near the river, the soil is likely alluvium (silt/clay) with possibly high groundwater. Also, if any residual contamination remains, infiltration might risk spreading it. A soil infiltration test is needed to see if soakage is viable. If tests show decent infiltration rates and clean conditions, incorporating permeable surfaces (for parking bays, walkways) and soakaway structures could manage a portion of the runoff on-site. Building Regulations (Part H) and SuDS best practice encourage that infiltration is considered first in the hierarchy of drainage solutions. We will do so but remain cautious about its practicality here.
- **Attenuation and Controlled Discharge:** If infiltration is poor or undesirable (likely in floodplain soil), the plan would use attenuation. This means capturing runoff in storage facilities and releasing it slowly to the river or sewer. Storage can be provided as subsurface tanks or oversized pipes, or more ideally as open features like detention basins or bio-retention swales at surface (if space allows). On a tight site, underground cellular storage might be easiest under a car park. The discharge could then be throttled with a flow control (e.g. Hydro-Brake) to a set rate (often the greenfield rate for the 1 in 1 and 1 in 100-year events). If allowed, discharging to the River Wey is logical since it's adjacent – this avoids adding load to public sewers and the river is the natural receptor. We would need EA consent for a new outfall structure. The water quality aspect is important: before water enters the river, it should be treated. SuDS can do this (e.g. a vegetated swale or pond provides biological treatment). If space for an open feature is limited, at least include a silt/oil interceptor and perhaps a proprietary treatment unit. The EA will expect measures to ensure no pollutants (like oil from parked cars) get into the Wey.
- **Green Infrastructure SuDS:** We can integrate greenery that doubles as drainage elements. For instance, green roofs on the office buildings would capture rainwater, slow down runoff, and count towards BNG. Green roofs typically retain a significant first flush of rain and release the rest slowly. Additionally, rain gardens or planter boxes could be installed in courtyards or along building edges – these are shallow landscaped depressions that take

roof or road runoff and let it soak into engineered soil, feeding plants, with an overflow to the drain. These improve water quality and are visually pleasing, contributing to amenity space.

Surrey County Council's SuDS guidance emphasizes designing with a "SuDS management train" – using multiple sequential components to slow, filter, and store water. A potential train for our site might be green roof (source control) -> permeable paved parking with sub-base storage -> an underground tank or open basin in the riverside landscape (for larger storms) -> outfall to river at restricted flow. At each stage, water is being managed closer to its source rather than immediately piped away.

Constraints and Solutions: Some constraints to consider:

- The site is small and must accommodate buildings and parking, limiting space for large ponds or swales. Creative use of **dual-purpose spaces** is key (e.g., a landscaped plaza that can temporarily hold water in extreme rain or using the 8m river buffer not just as habitat but also as an overflow swale).
- High groundwater (if present) could mean underground storage needs to be carefully designed (watertight tanks or shallow features). But high groundwater also means infiltration is less likely, reinforcing the need for attenuation.
- The proximity of the river means during river flood events; the outfall might be submerged (if river levels rise). Non-return valves will be needed on any outfall to prevent reverse flow. Also, the drainage system might need to be designed to store water if the river is at flood stage and cannot accept discharge for a time. This scenario should be checked in the FRA and drainage strategy.
- If contamination is an issue, infiltration could potentially mobilize pollutants. In such case, a lined attenuation system (preventing infiltration) is preferred, and water should be discharged to the river (with appropriate treatment) rather than allowed to soak through contaminated soils.

Approval and Adoption: Surrey County Council, as LLFA, will scrutinize the drainage strategy at planning stage. They require a Surface Water Drainage Strategy report plus a completed pro-forma. For major developments, this is part of the validation requirements – an application without a clear drainage plan might not be valid or could face objections. The strategy should include calculations of runoff for pre- and

post-development for various storm events + climate change, sizing of storage, and demonstrate how the system follows the **SuDS hierarchy** (infiltration first, then watercourse, then sewer as last resort). The local water authority (Thames Water) would also need to be consulted if any connection to their sewer is proposed (even for an overflow).

Adoption of SuDS is a consideration: open SuDS might be maintained by the site owner or management company. If any sewer adoption by Thames Water is pursued, the system must meet their standards. However, many SuDS will likely remain private (which is fine for a single-owner commercial site). A maintenance plan for the SuDS will be required – e.g., how often permeable paving is cleaned, who will dredge any silt from basins, etc. The county will want assurance that these will be maintained for the lifetime of the development.

Conclusion on SuDS Feasibility: Implementing SuDS here is not only feasible but expected. The site currently is 100% hard runoff; the new scheme can greatly better manage stormwater. By doing so, it will reduce strain on drainage infrastructure and help improve water quality entering the River Wey. For example, by using natural filtration in landscaped areas, pollutants are broken down rather than discharged. This aligns with modern requirements – *“SuDS seek to mimic natural drainage systems and retain water on or near to the site, in contrast to traditional approaches which pipe water off-site as quickly as possible,”* offering clear advantages. The design team should incorporate drainage experts early to ensure space for SuDS components is allocated (it’s much harder to retrofit at the end). Early indications are that attenuation with controlled outfall to the Wey is likely the strategy, combined with as much source control as possible (green roofs, permeable surfaces). There do not appear to be any insurmountable drainage issues – the strategy just needs to be carefully planned in accordance with Surrey’s guidance and industry best practices.

This project got planning approval.
Surrey Planning 23/P/02138

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