

# **Sustainability Appraisal (SA) of the Guildford Borough Local Plan**

**SA Report Update**

**June 2017**

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## INTRODUCTION

## 1 BACKGROUND

- 1.1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Guildford Borough Local Plan. Once adopted, the Local Plan will allocate land for development, present policies (district-wide and site-specific) to guide future planning applications and ultimately provide a planning framework for the district up to 2034.
- 1.1.2 SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising the positives. SA of Local Plans is a legal requirement.<sup>1</sup>
- 1.1.3 The Local Plan is at an advanced stage of preparation, with the 'proposed submission' version published for consultation in June 2016, under Regulation 19 of the Planning Regulations.
- 1.1.4 'Targeted changes' to the proposed submission version are now published for consultation.

## 2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).<sup>2</sup>
- 2.1.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.<sup>3</sup> The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 More specifically, the SA Report must answer the following **three questions**:<sup>4</sup>
  - 1. What has plan-making / SA involved **up to this point?**
    - Including in relation to 'reasonable alternatives'.
  - 2. What are the SA findings **at this stage?**
    - i.e. in relation to the draft plan.
  - 3. What happens **next?**

### 2.1 This SA Report Update

- 2.1.1 The SA Report was published alongside the Proposed Submission Plan in 2016, in order to inform the consultation and subsequent plan-making. The SA Report answered questions 1 – 3 (as described above) in turn, in order to provide the required information.
- 2.1.2 This SA Report Update is published alongside the 'Targeted Changes' consultation document, in order to inform the consultation, and subsequent plan-making. This SA Report Update answers questions 1 – 3 (as described above) in turn, *with a particular focus* – see **Table 2.1**.

<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

<sup>2</sup> Procedurally SA and SEA are one and the same, on the basis that there is no legislation or guidance to suggest that SA process should differ from the prescribed SEA process. SA and SEA differ only in terms of substantive focus. SA has an equal focus on all three 'pillars' of sustainable development (environment, social and economic), whilst SEA involves a degree of focus on the environmental pillar. SA can therefore be said to 'incorporate' SEA.

<sup>3</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

<sup>4</sup> See Appendix I for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

Table 2.1: Information provided by this SA Report Update

Part of the report	Information presented
1)	The 'back-story' is summarised as appropriate.  Detailed information is presented on the <b>reasonable alternatives</b> considered by the Council ahead of finalising the Targeted Changes for consultation.
2) What are the SA findings at this stage?	This part of the report presents an appraisal of the Proposed Submission Plan, as it stands at the current time, i.e. the <b>Proposed Submission Plan 2016 plus Targeted Changes</b> .  However, it is recognised that only Targeted Changes are currently published for consultation. As such, stand-alone consideration is also given to the <b>Targeted Changes</b> .
3) What happens next?	The information presented is identical to that presented within the SA Report, except for some minor updates.

### 3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

- 3.1.1 Once in place, the Local Plan will establish a spatial strategy for growth and change in the borough over the period up to 2034, allocate sites and establish the policies against which planning applications will be determined.
- 3.1.2 The Local Plan will be in general conformity with the National Planning Policy Framework (NPPF), and in-line with planning legislation and regulations including the Localism Act 2011. The Act places a duty on the Council to co-operate with neighbouring authorities - including Woking Borough, Elmbridge Borough, Mole Valley District, Waverley Borough, Rushmoor Borough and Surrey Heath Borough. Similarly, the Council is required to cooperate with other authorities such as Surrey County Council and Highways England.
- 3.1.3 The Local Plan seeks alignment with the Council's Corporate Plan 2015-20, which establishes the ambition for Guildford to be *"a town and rural borough that is the most desirable place to live, work and visit in South East England."* The Corporate Plan goes on to explain that:
- "We want Guildford to be a centre for education, healthcare, innovative and cutting-edge businesses, high quality retail and wellbeing. A county town set in a vibrant rural environment which balances the needs of urban and rural communities alike. Known for our outstanding urban planning and design, and with infrastructure that will properly cope with our needs."*
- 3.1.4 The Corporate Plan identifies a series of themes for action, each of which in turn is associated with a series of objectives. The relevant themes that emerge from the Corporate Plan are -
- "Our Borough - ensuring that proportional and managed growth for future generations meets our community and economic needs.
  - Our Economy - improving prosperity for all by enabling a dynamic, productive and sustainable economy that provides jobs and homes for local people.
  - Our Infrastructure - working with partners to deliver the massive improvements needed in the next 20 years, including changes to tackle congestion issues.
  - Our Environment - improving sustainability and protecting our countryside, balancing this with the needs of the rural and wider economy.
  - Our Society - believing that every person matters and concentrating on the needs of the less advantaged."

3.1.5 In light of the Corporate Plan themes, the plan objectives are as follows –

- Deliver sufficient sustainable development that meets all identified **needs**.
- Improve **opportunities** for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities.
- Ensure that all development is of high quality **design** and enables people to live safe, healthy and active lifestyles.
- Retain the distinct **character** and separate identities of our settlements.
- Protect and enhance our **heritage** assets and improve the quality of our built and natural environment.
- Protect those areas designated as Thames Basin Heaths Special Protection Area, Special Areas of Conservation, Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty for their **biodiversity and landscape** characteristics.
- Ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, **climate change**.
- Maintain and enhance our role as one of the County's key **employment** locations in both a strategic and local context by providing and protecting a range of employment sites in appropriate locations.
- Reinforce our role as a world leader in **innovation and research**, with a particular focus on bio-technology, space and electronic gaming industries, and the sustainable growth of Surrey Research Park and the borough's other business hubs.
- Support and expand the economic vitality of our **rural areas** whilst protecting existing heritage, landscape and character
- Reinforce Guildford's role as Surrey County's premier **town centre** destination whilst protecting and enhancing its cultural facilities and heritage assets.

## 3.2 What is the Local Plan not seeking to achieve?

3.2.1 It is important to emphasise that the plan will be strategic in nature. In particular,

- whilst the plan will establish thematic policy, the detail will be limited in the knowledge that production of a second Local Plan – focused on addressing detailed development management issues - will commence upon adoption of this current plan; and
- whilst sites will be allocated, and site-specific policy prepared, consideration of detailed issues will be limited in the knowledge that there will be the potential to identify and address detailed issues at the planning application stage.

3.2.2 The strategic nature of the Local Plan is reflected in the scope of the SA.



## 4 WHAT IS THE SCOPE OF THE SA?

### 4.1 Introduction

- 4.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of (and provide a broad methodological framework for) SA.
- 4.1.2 Further information on the scope of the SA – i.e. a review of sustainability issues/objectives as highlighted through a review of the sustainability ‘context’ and ‘baseline’ - is presented in **Appendix II**.

#### Consultation on the scope

- 4.1.3 The Regulations require that “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>5</sup> As such, these authorities were consulted on the SA scope in 2013.<sup>6</sup> Since that time, the SA scope has evolved as new evidence has emerged - however, the scope remains fundamentally similar to that agreed through the dedicated scoping consultation in 2013.

### 4.2 Key issues / objectives

- 4.2.1 **Table 4.1** presents the sustainability issues/objectives established through SA scoping, i.e. in-light of context/baseline review and consultation. Taken together, these sustainability issues and objectives provide a methodological ‘framework’ for appraisal.

#### Has the SA framework been updated recently?

- 4.2.2 Some minor updates were made to the SA framework in 2016, i.e. subsequent to the 2014, Interim SA Report / prior to the 2016 SA Report. Updates were as follows:
- With regards to the **objectives** –
    - Listed in alphabetical order and not grouped under ‘topic’ headings.
    - An objective added relating to landscape, to reflect the degree of interest in this subject.
    - The objective relating to climate change modified to clarify that the focus is ‘mitigation’.
  - With regards to the **issues** several edits were made to reflect latest evidence, including addition of an issue relating to equalities, and clarification of economy-related issues.
  - The **indicators** that were listed alongside objectives and issues in the 2014 report have been removed. Indicators are returned to in chapter 31 (‘Monitoring’).

<sup>5</sup> In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

<sup>6</sup> The Scoping Report (updated to reflect consultation responses) is available at: [http://www.guildford.gov.uk/media/15156/Sustainability-Appraisal-Scoping-Report-July-2013/pdf/SA\\_Scoping\\_Report\\_FINAL\\_ISSUED\\_July2013.pdf](http://www.guildford.gov.uk/media/15156/Sustainability-Appraisal-Scoping-Report-July-2013/pdf/SA_Scoping_Report_FINAL_ISSUED_July2013.pdf). Also, ‘Site Assessment Criteria’ were consulted on in 2013 – see [http://www.guildford.gov.uk/media/15668/SA-Site-assessment-criteria/pdf/SA\\_Site\\_assessment\\_criteria.pdf](http://www.guildford.gov.uk/media/15668/SA-Site-assessment-criteria/pdf/SA_Site_assessment_criteria.pdf)



Table 4.1: Sustainability issues and objectives (i.e. the SA framework)

Sustainability objectives	
1. Maintain, conserve and	
2. Mitigate <b>climate change</b> through reducing emissions of greenhouse gases	Government policy requires new development to promote sustainable construction, <b>energy conservation and renewable energy</b> .
3. Create and sustain vibrant <b>communities</b>	Catering for <b>population growth</b> in the short-term with its associated social, economic and environmental consequences.
	Give due regard to promoting equality of opportunity for all <b>protected groups</b> , e.g. the elderly. <sup>7</sup>
4. Maintain Guildford borough and Guildford town's competitive <b>economic role</b>	Support <b>Growth Town</b> objectives, in line with the Enterprise M3 Local Enterprise Partnership's Strategy Economic Plan.
	The high cost of <b>housing</b> prevents essential workers from living in much of the borough, affecting the ability of businesses to recruit.
5. Facilitate <b>employment</b> development opportunities to meet the changing needs of the economy	Maintain a diverse and targeted supply of <b>employment land</b> , suited to the local workforce and recognising the changing needs of business.
6. Reduce the risk of <b>flooding</b> and the resulting detriment to public well-being, the economy and the environment	Heavier rainfall in winter will increase hazards arising from <b>fluvial</b> flooding and the number of properties that are at risk from flooding will increase. <b>Surface water</b> flooding will increase as a result of more frequent storms (given climate change).
7. Facilitate improved <b>health and well-being</b> of the population, including enabling people to stay independent and reducing inequalities in health	Life expectancy in the borough compares favourably with the South East and the rest of the country. There is a need to plan for the social and economic impacts of <b>longevity</b> .
	Obesity in the county is increasing. Provision of adequate sports and leisure facilities to encourage more <b>active lifestyles</b> should be regarded as an important component of community infrastructure.
	There is a need to conserve the historic and cultural heritage for future generations as it is an essential part of what makes the borough a <b>distinct place</b> .
9. Provide sufficient <b>housing</b> of a suitable mix taking into	High average house prices create <b>affordability</b> problems for local people, first time buyers and essential workers.

<sup>7</sup> The Council has a duty to give "due regard" to promoting equality of opportunity for all protected groups when making decisions; and publish information showing how they are complying with this duty. 'Protected groups' are those with the following characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

Sustainability objectives	Sustainability issues
account local housing need, affordability, deliverability, the needs of the economy, and travel patterns	
10.Minimise use of best and most versatile agricultural <b>land</b> and encourage the remediation of contaminated land	Contamination issues may arise on <b>previously developed sites</b> .
11.Conserve and enhance <b>landscape character</b>	Development pressures, fuelled by high land and property prices, pose <b>threats</b> to landscape interests.
12.Reduce <b>poverty and social exclusion</b> for all sectors of the community	Address <b>pockets of deprivation</b> , recognising that the index of multiple deprivation dataset shows some notable increases in variation.
	There are a significant number of adults with no <b>qualifications</b> .
13.Make the best use of <b>previously developed land</b> and existing buildings	
14.Enhance the borough's <b>rural economy</b>	There is a need to support agriculture and other rural <b>businesses</b> ; and also a need to support affordable <b>housing</b> in villages.
15.Create and maintain <b>safer and more secure</b> communities	
	Address occurrences and the <b>perception of crime</b> .
	Ensure the <b>safety</b> of pedestrians and cyclists.
16.Achieve a pattern of development which minimises journey lengths and encourages the use of sustainable forms of <b>transport</b> (walking, cycling, bus and rail)	For those without a car, access to facilities in <b>rural areas</b> is an issue.
	There are currently no Air Quality Management Areas ( <b>AQMAs</b> ) in the borough; however, there are some hotspots of lesser air quality.
	Adverse economic, social and environmental impacts of high traffic volumes and a culture of <b>dependence on private car use</b> include recurrent traffic congestion on certain parts of the network at certain times of day, road collisions, community severance, obesity, noise pollution, localised air pollution, greenhouse gas emissions, high demand for parking, and amenity of local neighbourhoods.
17.Reduce <b>waste</b> generation and achieve the sustainable management of waste	There is an identified need to reduce the proportion of waste sent to landfill and increase the proportion of waste <b>recycled</b> and <b>composted</b> .
18.Maintain and improve the <b>water</b> quality of the borough's rivers and groundwater, and to achieve sustainable water resources management	River <b>quality</b> is generally poor and should be improved, recognising that climate change is set to impact (e.g. because of low flows). <b>Groundwater</b> is also a constraint, with approximately 30% of the borough located on principle aquifers and the presence of 14 source protection zones (SPZ).

## **PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?**

## 5 INTRODUCTION (TO PART 1)

- 5.1.1 Local plan-making has been underway since late 2012 (building upon earlier work on a Core Strategy), with two formal consultations having been held under Regulation 18 of the Local Planning Regulations, in 2013 and 2014, and one formal consultation having been held on Regulation 19, i.e. 'publication' of the Proposed Submission Plan in 2016.
- 5.1.2 The aim here is not to recount the entire plan-making 'story' date, but rather to explain how work was undertaken to develop and then appraise **reasonable alternatives** in early 2017, and how the Council then took into account appraisal findings when finalising the Targeted Changes. Presenting this information is important given regulatory requirements.<sup>8</sup>
- 5.1.3 More specifically still, this part of the report presents information regarding the consideration of reasonable alternative approaches to housing growth, or '**spatial strategy alternatives**'. It is clear that allocating land for housing is at the heart of the plan objectives (see Chapter 3).

### What about other plan issues?

- 5.1.4 Whilst the plan will set policy to address a range of other thematic issues through district-wide development management policy, and development management policies are a focus of Targeted Changes, these policy areas were not a focus of alternatives appraisal, and hence are not discussed further within this part of the Report (but are a focus of the appraisal presented in Part 2). This decision was taken in the knowledge that other plan issues have been the focus of alternatives appraisal in the past, and by 2017 understanding of strategic options/choices had narrowed, i.e. 'things had moved on'.
- 5.1.5 An informal discussion of alternatives - or more specifically the *lack of* alternatives - for DM policy issues was included in the 2016 SA Report; however, no representations were received suggesting a need to formally revisit alternatives in 2017. A brief informal discussion is once again presented in this report -see **Appendix III**.

### What about site options?

- 5.1.6 Plan-making has involved giving consideration to a large number of site options, i.e. sites in contention for allocation. Most notably, there has been a need to give careful consideration to *greenfield* sites options, as established by the Green Belt and Countryside Study (GBCS), which are known as Potential Development Areas (PDAs).
- 5.1.7 Site options are not 'alternatives', in that there is no mutually exclusive choice to be made between them; nonetheless site options have subjected to appraisal through the SA process. The purpose of site options appraisal was to inform development of reasonable spatial strategy alternatives, i.e. alternative combinations of site options.
- 5.1.8 Site options are discussed in Chapter 6 of this report "Establishing the reasonable alternatives", with site options appraisal findings presented in **Appendix IV**.

### Structure of this part of the report

- 5.1.9 This part of the report is structured as follows:

**Chapter 6** - explains the process of **establishing** the reasonable alternatives

**Chapter 7** - presents the outcomes of **appraising** the reasonable alternatives

**Chapter 8** - explains reasons for **establishing** the preferred option, in light of the appraisal.

<sup>8</sup> There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

## 6 ESTABLISHING THE REASONABLE ALTERNATIVES

### 6.1 Introduction

- 6.1.1 Building on Chapter 5, this chapter aims to complete the discussion of “outline reasons for selecting the alternatives dealt with”.
- 6.1.2 As per the equivalent chapter of the 2016 report, this chapter 1) explains the **context** to alternatives development; and then 2) explains the **process** of considering ‘givens/variables’, and ultimately ‘options’, followed in order to establish reasonable alternatives.

Figure 6.1: Establishing the reasonable alternatives

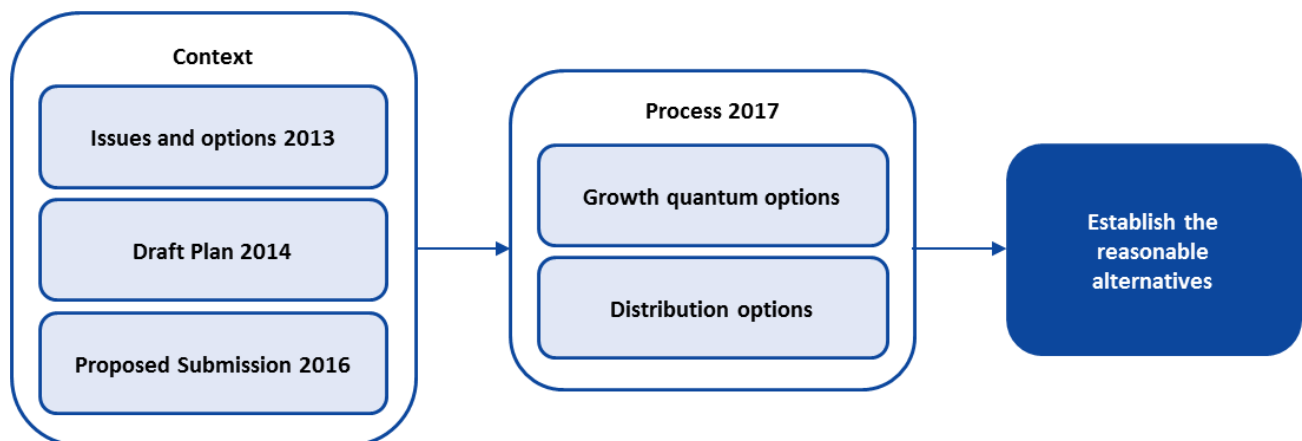


Table 6.1: Information presented within each section

Section	Information presented	
6.1		Issues and Options stage <b>2013</b>
6.2		Draft Plan stage <b>2014</b>
6.3		Proposed Submission Plan stage <b>2016</b>
6.4	Process <b>2017</b>	Consider growth quantum options
6.5		Consider distribution options
6.6	The reasonable alternatives <b>2017</b>	

## 6.2 The Issues and Options stage (2013)<sup>9</sup>

6.2.1 The aim is to discuss lessons from the Issues and Options stage. Consideration is given to A) the consultation document; B) the Interim SA Report; and then C) consultation responses.

### A) The consultation document

6.2.2 The document discussed a series of 'issues' in turn. In some cases the discussion led to a series of alternatives (i.e. mutually exclusive options),<sup>10</sup> whilst in other cases the discussion led to the identification of suggested approaches/options for comment. Chapter 9 of the document dealt with spatial strategy, with the Council inviting comments on: all of the site options understood at that time to be available and potentially deliverable; and seven alternative 'examples' of how sites might be delivered in combination in order to meet objectively assessed needs (which were yet to be established). **Box 6.1** explains more about the thinking behind the seven alternative spatial strategy examples.

#### *Box 6.1: Factors influencing development of the seven alternative spatial strategy examples in 2013*

Presenting the seven examples was a mechanism to explain that:

- There are certain 'givens' including the need to maximise redevelopment of appropriate buildings and spaces in the towns and villages, use land on the edge of villages to provide affordable housing<sup>11</sup> and use previously developed land in the countryside.
- There are certain strategic 'choices' relating to whether or not, and to what extent, the Council should support growth at -
  - countryside beyond the Green Belt (CBGB), which is found in the west of the borough;
  - countryside in the centre of the borough, around the edge of Guildford Town;
  - countryside around certain existing villages, in order deliver expansion;
  - countryside around one or more village in order to deliver significant expansion; and
  - a location in the countryside in order to deliver a new village.

### B) The Interim SA Report

6.2.3 The report went a step further than the consultation document, in that it defined (and then appraised) spatial strategy alternatives with an added degree of spatial specificity. The approach taken recognised that, whilst the spatial strategy is a 'given' under a max growth scenario and under a low growth scenario,<sup>12</sup> under medium growth scenarios there are clear choices to make regarding spatial strategy. The overall conclusion of the spatial strategy alternatives appraisal (reached after having examined the performance of each option in terms of the SA framework) is summarised in **Box 6.2**.

<sup>9</sup> See <http://www.guildford.gov.uk/article/3976/Issues-and-Options>

<sup>10</sup> For example, three alternatives were identified in relation to 'Supply and location of offices and industrial buildings' – 1) Plan to provide enough employment land only to meet the expected employment needs of existing and new residents; 2) Plan to provide enough employment land to meet the expected employment needs of existing and new residents and commuters; and 3) Plan to provide extra employment land to meet the expected demand from a growth in business activity.

<sup>11</sup> So-called 'rural exception sites', which the NPPF defines as: "Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection."

<sup>12</sup> Under a low growth scenario, the Council recognised that - after maximising redevelopment of appropriate buildings and spaces in the towns and villages, using land on the edge of villages to provide affordable housing and using previously developed land in the countryside – the shortfall would be met by delivering some (limited) growth to the countryside around Guildford Town and some (limited) growth to the countryside in the west of the borough.

#### Box 6.2: Conclusions of the 2013 appraisal of spatial strategy alternatives (summarised)

By proposing higher housing numbers, Options D – G are considered most likely to provide adequate levels of housing stock to meet identified need and more affordable housing in the borough, both of which have been identified as key sustainability issues. Therefore in this sense, Options D - G perform best and would have clear positive effects on a number of the social and economic objectives, including with respect to the borough's economic performance. However, the level of growth proposed by these options, particularly under Option G, would not be without environmental implications. In particular, there are likely to be negative effects in terms of biodiversity, air/noise/light pollution, greenhouse gas emissions and landscape.

As such, in this sense there is no clear preference for a particular option from a sustainability perspective. However, with appropriate mitigation, some of the environmental effects associated with the higher growth levels might be ameliorated (e.g. through stringent design standards, cycling and public transport connections between new developments and employment/retail centres and the routine provision of green infrastructure as part of new developments). Consequently, Options D – G, which favour higher levels of housing growth, on balance potentially perform relatively well overall.

In terms of spatial strategy, there are essentially three options: urban concentration; rural dispersal; and hub and spoke, i.e. development in urban areas ('hubs') and rural centres ('spokes').

The SHLAA (2013) for Guildford Borough concluded that there is the potential for residential development in the urban areas and village settlements to deliver up to 4,769 homes over the next 15 years. This is clearly well below the identified housing need figure of 13,040. As such, significant extension of existing urban boundaries is necessary. 'Dispersal' would result in great socio-economic benefits in rural areas, but not without consequences (increased car use, pressure on biodiversity assets). An urban concentration approach would focus on strengths and reduce travel time / trips and pressure on biodiversity, but might neglect rural areas. A hub and spoke approach should have the benefits of both with less disadvantages.

Finally, appraisal highlights that Option G (maximise growth) is expected to perform worst in terms of biodiversity, given that a new village in the north east of the borough would be in proximity to the Thames Basin Heaths SPA. This is an important consideration, although biodiversity objectives must be balanced against other objectives (e.g. Option G performs best in terms of 'housing', 'communities' and 'economy').

6.2.4 The report also presented alternatives appraisal findings in relation to a series of thematic, borough-wide policy issues, namely: Mix and density; Affordable housing; Size and threshold; Rural exceptions; Homes for travellers; Homes for students; Cultural capital; Employment space (lack of suitable large / modern units); Supporting the rural economy; Balancing growth with traffic and congestion; Alternative travel; Green open space; Built environment; and Climate change. There is no need to summarise appraisal findings here, and indeed it is suggested that alternatives appraisal findings from 2013 need not ('reasonably') be a focus of attention at the current time; however, additional information is presented in Appendix III.

#### C) Consultation responses

6.2.5 The consultation generated a high degree of interest, and a note setting out findings of the consultation was published in early 2014. Issues raised in relation to the spatial strategy included the following -

- The Environment Agency declined to suggest a preferred spatial strategy option, but did state their position as follows: "[W]e would prefer the approach of redeveloping appropriate buildings and brownfield sites prior to developing on greenfield land. However, we acknowledge that to meet your estimated development need you will have to develop greenfield areas. In all instances and to facilitate the required development you should consider the potential risk from contamination to controlled waters resulting from existing or previous land uses. Additionally you should consider the groundwater vulnerability of each designation such as the proximity of a principal aquifer or source protection zone. We would expect a sequential approach to be taken relating flood risk, the impacts on water quality and resources and the impact on biodiversity when considering the location of the developments (i.e. locating development in the most suitable areas with the least impact on biodiversity and from flooding). Furthermore, we would seek that the required supporting



infrastructure (e.g. water resources and supply, waste disposal and treatment, etc...) has been satisfactorily considered, addressed and implemented prior to any allocation and/or development as to minimise the impacts on the environment resulting from any potential short-comings.”

A number of more specific points, with spatial strategy implications were made, including:

- “In the outcome of conducting further assessments around other villages and settlements and if you decide to explore the option of designating development further south closer to Waverley BC, you will need to consider the high risk Lower Greensand groundwater.”
- “If the former Wisley airfield site is pursued there would be the opportunity to investigate and address any potential contamination issues that may have an impact on controlled waters. Additionally... protect and enhance the river and river corridor.”
- Historic England stated, in relation to the spatial strategy options, that: “It would be inappropriate at this stage, and in the absence of detailed heritage impact assessments, to indicate a preference for one scenario or combination of two scenarios.” However, HE did emphasise the need to “recognise that the success of Guildford town centre as leading regional service and retail destination is underpinned by the its high quality character and appearance as an historic town, which makes its offer distinctive from many competing centres.” More specifically, in relation to Green Belt development around the edge of Guildford, HE stated that: “The development of the areas indicated on the scale suggested would also potentially have implications for the character of Guildford and its setting, removing some of the historical association between town and country that underpins the town’s traditional relationship with its rural hinterland.” Also, in relation to growth at villages, HE stated that: “Any consideration of the retention or exclusion of settlements from the Green Belt should include an assessment of the historic character of the villages being reviewed and the desirability of preserving their setting and special character. It may be that designation as conservation areas of historic villages excluded from the Green Belt could be a means of managing development and protecting character and appearance.”
- M3 LEP stated that: “As a general principal [Enterprise M3] supports the idea of development that has good infrastructure links, including those to public transport, educational establishments in addition to strong links to local labour markets and such characteristics are often found in key economic centres such as Guildford. Enterprise M3 encourages options for new development that integrate well with existing facilities and opportunities for employment.” A more specific view was: “Guildford is the main town and economic powerhouse for the borough and plays a key part in the wider Enterprise M3 area. It needs to be able to accommodate new development to ensure the future vitality and prosperity of the town and its surroundings.”
- Thames Water stated that: “In very general terms it is quicker to deliver infrastructure on a small number of clearly defined large sites than it is in a large number of small sites, which may not be clearly defined. Thames Water would also prefer for growth to be distributed relatively evenly around the existing main urban centres. It is vital infrastructure in place ahead of development if sewer flooding and low / no water pressure issues are to be avoided. It is also important not to under estimate the time required to deliver necessary infrastructure, for example: -local network upgrades take around 18 months - Sewage Treatment & Water Treatment Works upgrades can take 3-5 years - New water resources & treatment works can take 8-10 years.”
- Waverley Borough Council suggested that: “A key issue will be to ensure that the number of homes being planned for takes account of the economic needs of the borough and contributes to addressing the commuting patterns.” More specifically, WBC emphasised the need to be “explicit in recognising the sub-regional role that Guildford plays in terms of a centre for employment, education, leisure and retailing.” More specifically still, in relation to Ash and Tongham, WBC stated that: “[T]he Council would welcome the opportunity to consider the wider impact of potential land releases in this area not just within Guildford Borough but also any sites that may come forward in Waverley...”



### 6.3 The Draft Local Plan stage (2014)<sup>13</sup>

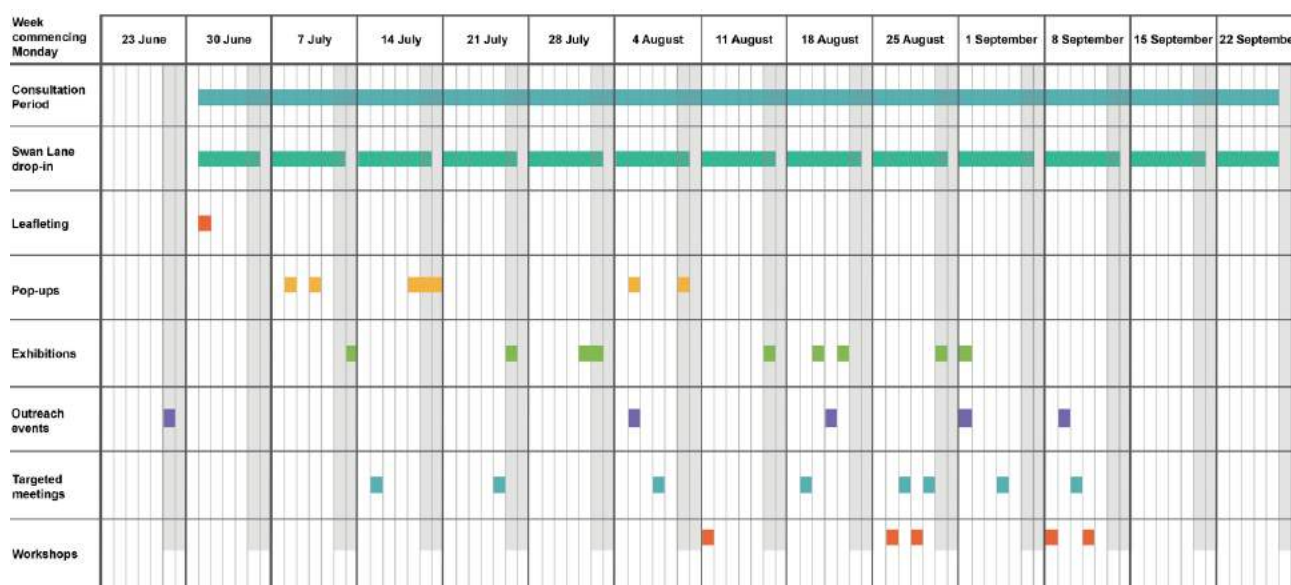
6.3.1 The aim is to discuss lessons learned from the Draft Plan stage. Consideration is given to A) the consultation document; B) the Interim SA Report; and then C) consultation responses.

#### A) The consultation document

6.3.2 The document presented 19 draft borough-wide policies and c.100 draft site allocations. Sites were grouped according to their broad location (e.g. 'within village' sites were grouped together) and presented across a series of maps. Also, a completed proforma was presented for each site, listing planning 'considerations' and 'opportunities'.

6.3.3 The consultation ran for 12 weeks (i.e. twice as long as standard practice) with extensive efforts made to ensure "every opportunity to engage people and make them aware about how they could submit their comments on the Draft Local Plan."<sup>14</sup> A range of consultation events were held to complement publication of the consultation – see Figure 6.2.

Figure 6.2: Consultation calendar 2014



<sup>13</sup> See <http://www.guildford.gov.uk/draftlocalplan>

<sup>14</sup> See the Statement of Community Engagement at: [http://www.guildford.gov.uk/media/18513/GBC-Strategy-and-Sites-Consultation-2014-doc/pdf/GBC\\_Strategy\\_and\\_Sites\\_Consultation\\_2014\\_doc.pdf](http://www.guildford.gov.uk/media/18513/GBC-Strategy-and-Sites-Consultation-2014-doc/pdf/GBC_Strategy_and_Sites_Consultation_2014_doc.pdf) and [http://www.guildford.gov.uk/media/18514/GBC-Strategy-and-Sites-Consultation-2014-appendices/pdf/GBC\\_Strategy\\_and\\_Sites\\_Consultation\\_2014\\_appendices.pdf](http://www.guildford.gov.uk/media/18514/GBC-Strategy-and-Sites-Consultation-2014-appendices/pdf/GBC_Strategy_and_Sites_Consultation_2014_appendices.pdf)

## B) The Interim SA Report

- 6.3.4 As per this current report, the Interim SA Report published alongside the consultation document (for the second half of the 12 week consultation only)<sup>15</sup> essentially answered two key questions: (1) *What has plan-making / SA involved up to this point?* (2) *What are appraisal findings at this stage?*
- 6.3.5 In relation to (1), the report essentially –
- explained work to develop reasonable spatial strategy alternatives in 2013/14;
  - presented an appraisal of the alternatives ultimately arrived at;
  - presented the Council's response to the alternatives appraisal – see **Box 6.3**; and
  - presented site options appraisal findings.

### Box 6.3: Council's response to spatial strategy alternatives appraisal 2014 (summarised)

The Council's preferred option (652 dwellings per annum or 13,040 homes over the plan period) was chosen as it fits in the range of Objectively Assessed Housing Need in the Draft Guildford Strategic Housing Market Assessment (650 – 780 dwellings per annum). It is a level of development that the Council considers can be sustainably delivered over the plan period. Furthermore, it is the Council's view that this annual housing number (652) can be achieved for the first five years of the plan, taking into account any backlog in housing supply and a land buffer, as required by the National Planning Policy Framework.

The main reason for the Council's choice in terms of spatial strategy is the availability of suitable and deliverable sites. The spatial strategy set out in the Draft Local Plan is a hybrid of Options D and E. Both options considered at Issues and Options stage included a number of common elements such as redeveloping sites in towns and villages and developing rural exception and brownfield sites in the Green Belt, and non-Green Belt countryside in the west of the borough (Option E included about half of the land, Option D included all of it; the Draft Local Plan proposes development of part of this land). The draft plan includes two greenfield extensions on the edges of Guildford town, which reflects Option D. Also, in line with Option E, the Draft Local Plan also includes the expansion of villages by using greenfield land around them, and significantly expanding an existing village (land at Normandy / Flexford which is safeguarded for development subsequent to the plan period).<sup>16</sup>

- 6.3.6 In relation to (2), appraisal concluded: *positive effects* in terms of: meeting housing needs; health (including due to specialist housing provision and support for active lifestyles), reduced car uses / increased accessibility; biodiversity, soil and water resources (given a focus on blue / green infrastructure) and heritage; *minor or indirect positive effects* in terms of education (given a focus on linking housing to education and providing high quality student accommodation), economy and employment, landscape and climate change mitigation; and *negative effects* in terms of air/environmental quality (given a focus of development at Send and Ash/Tongham) and affordable housing needs (given that delivering the 'objectively assessed housing need' figure would not involve meeting affordable housing needs in full).

<sup>15</sup> N.B. The Council recognises that it was non-ideal to publish the Interim SA Report 6 weeks into the 12 week consultation, and regrets any confusion that was caused. However, it is worth noting that publication of Interim SA Reports alongside consultation documents at Regulation 18 is essentially a voluntary exercise (with the Local Planning Regulations requiring only that the SA Report is published alongside the Proposed Submission Plan at the Regulation 18 stage).

<sup>16</sup> The Council's text from 2014 also went on to explain that an element of Option G had been integrated into the preferred strategy, namely the allocation of Wisley Airfield for a new settlement.

### C) Consultation responses

6.3.7

Consultation generated a very high degree of interest. More than 7,000 people responded providing over 20,000 comments, with 1,043 people attending the consultation events and over 1,600 people visiting the consultation hub at 25 Swan Lane, Guildford. Issues raised in relation to the spatial strategy included the following -

- The Environment Agency highlighted certain concerns relating to flood risk and water quality/resource issues, for example stating:
  - “Within the draft [plan] and the supporting documents we are finding it difficult to reassure ourselves that the flood risk sequential test has been appropriately applied. The flood risk sequential test applies to strategic land and individual site allocations.”
  - “We recommend that you include a local plan strategic water quality policy steering inappropriate development such as polluting industries, cemeteries away from SPZ. Furthermore, high rise buildings or structures that require piling in addition to discharge surface water runoff may be restricted in these areas depending on... circumstances.”
- M3 LEP made detailed representations on a range of issues, with key quotes including -
  - “The Local Plan includes major sites for development that offer a critical mass of housing. However, some are better located than others for proximity to existing infrastructure, places of employment and town centre resources... We welcome the capacity that such sites offer for new housing development... We note that large, mixed-use sites are likely to be more capable than others of cross-subsidising new infrastructure – locations where such development could reduce congestion through the delivery of new roads or railway services... could bring especially advantageous, catalytic benefits.”
  - “The ongoing success of Guildford Borough is particularly important because it has great strengths to build upon including: its strategic location; the borough’s strong business base (including firms operating in growth sectors); successful academic establishments and the renowned university Research Park...”
  - “Elmbridge, Guildford and Runnymede remain the least affordable locations in the Enterprise M3 area... The cost of renting a home is also relatively high in the Guildford area (some 20% higher than the average for Enterprise M3 area overall). We therefore welcome Local Plan policies that encourage development of more homes...”
  - “Some of these housing sites will have an element of employment uses within them. We support this principle but would encourage the Council to ensure that the proposed employment floorspace is well matched to business needs... The LEP has received anecdotal feedback that whilst there may be a choice of floorspace in quantitative terms, the real choice to satisfy particular requirements is constrained or problematic.”
  - “Feedback from businesses confirms a perception that road congestion is a serious issue that must be addressed.”
- Natural England focused comments primarily on specific site options, notably raising concerns in relation to the following proposed strategic site options:
  - “[Blackwell Farm]... is likely to give rise to significant impacts in the setting of the AONB. NE advises that a comprehensive Landscape and Visual Impact Assessment (LVIA) is carried out to determine whether these impacts can be avoided or mitigated.”
  - “Natural England has serious concerns about [Wisley Airfield]. Based on the information that we have been presented, Natural England questions the soundness of this allocation on the grounds that the proposal is likely to have an adverse effect on the integrity of the interest features for which the Thames Basin Heaths SPA has been classified. The Sustainability Appraisal has not demonstrated that there are not alternative sites that are less harmful to the natural environment to allocate for development than this site.”
- Surrey CPRE made detailed representations on a range of issues, for example stating that:
  - “We find that it may be considered that there is a degree of overemphasis in the Plan on

land in Guildford borough which is designated as beyond the Green Belt. We would like to have seen... a clear objection to further linear development along the roads between Guildford and Cranleigh, Dorking, Farnham, Godalming, Leatherhead, and Woking."

- Surrey Wildlife Trust highlighted a range of concerns, but in relation to the spatial strategy stated broadly that: "Where allocations would result in development of greenfield sites, we could only support these where [well located in terms of]: a) their adjacency/ proximity to land of existing value for biodiversity conservation, and b) their potential value for enhancing landscape connectivity within Biodiversity Opportunity Areas."
- Surrey Chamber of Commerce were supportive of a range of proposals, in particular the proposal at Blackwell Farm: "There are particular locational benefits to the proposed Blackwell Farm development as this will help to support three major centres of employment at the University, tenant companies on the Research Park and the Royal Surrey County Hospital by providing new homes within walking distance of potential workplaces and with good access to public transport, thus providing a solution to the major issue of affordable housing which has the knock-on effect of forcing people to commute long distances."
- Several neighbouring local authorities responded:
  - Both Wokingham and Epsom and Ewell focused on housing numbers, with Epsom and Ewell stating: "Our key input to the process will be to register our concern regarding the provision of sufficient housing land moving-forward. In the absence of a Regional Spatial Strategy, there does not seem to have been, hitherto, an effective means for the Districts and Borough's to cooperate over housing need. In particular, we would be concerned that SHMAs should be configured to assess not only local needs but also the predictions for growth emanating from the Greater London Authority area. There needs to be strategic consideration given to whether London's hinterland should be expected to take a proportion of the 42,000 – 50,000 new homes per annum that have been predicted by the GLA. If so, it cannot be assumed that any outward growth of the London conurbation would occur concentrically as in the 19th and early 20th centuries. There needs to be a planned strategic approach which ensures that growth is distributed to points where the appropriate infrastructure and services can be provided."
  - Waverley similarly commented on housing numbers, and also highlighted spatial strategy concerns relating to congestion on the A3 and development in the west of Guildford Borough [for example stating: "The area is close to the Badshot Lea area of Farnham and the Council would welcome the opportunity to discuss with you the wider impact of any potential land releases not only in Guildford but also in the eastern outskirts of Farnham."]
  - Elmbridge highlighted concerns regarding growth in the north east of Guildford, particularly at Wisley Airfield: "We query whether this is the right location for this scale of growth. The fundamental aim of the Metropolitan Green Belt is ultimately to prevent the spread of London. The site is located in the very north [east] of the borough where the Green Belt is already very fragmented and particularly vulnerable to additional development, a point that was noted by the Inspector for the examination into our Core Strategy. Further evidence should be provided to indicate why this site has been identified in preference to other sites having regard to the strategic significance of the Green Belt in this location. This should include the degree to which the site is regarded as "Brownfield". In addition, we would like to raise the following key points..."
  - Surrey Heath Borough Council has a particular interest in the west of Guildford Borough, highlighting that: "Ash, Ash Vale and Tongham are part of the much wider Aldershot Built up Area which extends over a number of local authorities, including Surrey Heath. This area is often referred to as the Blackwater Valley urban area and its presence in the western area of Guildford Borough is significant component of the spatial pattern of development in the borough." They emphasise the importance of a strategic approach.

## 6.4 The Proposed Submission Local Plan stage (2016)<sup>17</sup>

6.4.1 The aim here is to discuss lessons learned from the Proposed Submission Local Plan stage (2016). Consideration is given to A) the consultation document; B) the SA Report; and then C) consultation responses.

### A) The consultation document

6.4.2 The document presented 22 proposed borough-wide policies and 57 proposed site allocations. Sites were grouped according to their broad location (e.g. 'within village' sites were grouped together) and presented across a series of maps. Also, a completed proforma was presented for each site, listing information on planning requirements and opportunities.

6.4.3 The consultation ran for six weeks from 6 June to 18 July 2016. Importantly, a range of supporting documents were published alongside the consultation document, including –

- a draft Infrastructure Delivery Plan;
- the SA Report (see discussion below);
- a Habitats Regulations Assessment (HRA) Report;
- an Equalities Impact Assessment (EqIA) Report;
- a Consultation Statement (explaining lessons learned through the previous consultations);
- a series of Topic Papers, for example covering 'Housing delivery and Transport'; and
- a suite of evidence-base documents, including the Land Availability Assessment (LAA), Strategic Housing Market Assessment (SHMA), a Transport Assessment.

6.4.4 The plan was covered extensively by the local press, with a public relations firm engaged by the Council to manage communications, and three consultation events were well attended. The number and range of consultation events and initiatives was not on a par with that in 2014 (see Figure 6.2, above), which was deemed proportionate.

### B) The SA Report

6.4.5 As per this current report, the SA Report essentially answered two key questions: (1) *What has plan-making / SA involved up to this point?* (2) *What are appraisal findings at this stage?*

6.4.6 In relation to (1), the report essentially –

- explained work to develop reasonable spatial strategy alternatives in 2016 – **Box 6.4**;
- presented an appraisal of the alternatives ultimately arrived at – see **Box 6.5**; and
- presented the Council's response to the alternatives appraisal – see **Box 6.6**.

6.4.7 In relation to (2) – i.e. the appraisal of the Proposed Submission Plan – the following conclusion was reached within the SA Report (2016) –

*"The draft plan performs well in terms of most objectives, with significant positive effects predicted in terms of key socio-economic objectives (communities and economy/employment). However, there are inevitably draw-backs to any plan, and, in this case, the appraisal highlights particular trade-offs in terms of 'land' (as there will be considerable loss of best and most versatile agricultural land) and 'biodiversity' (as there will be some loss of land designated locally for its biodiversity importance, and also development in close proximity to areas designated as being nationally and internationally important). In terms of these issues it is conceivably the case that an alternative strategy could be established that performs better; however, any alternative strategy would inevitably also have its drawbacks.*

<sup>17</sup> See <http://www.guildford.gov.uk/newlocalplan/proposedsubmission>



#### Box 6.4: Reasons for selecting the alternatives dealt with (2016)

Section 6.3 of the SA Report presented ‘an outline of the reasons for selecting the alternatives dealt with’, in accordance with Regulations. A stepwise process was described.

##### Step 1: Consider growth quantum options

The objectively assessed housing Need (OAHN) figure assigned to the borough by the West Surrey SHMA was introduced, and the need to potentially plan for a contingency, or ‘buffer’, over-and-above the OAHN figure was explained. Finally, the possibility of planning for higher growth, in order to meet unmet needs arising from elsewhere within the West Surrey Housing Market Area (HMA), was raised.

##### Step 2: Consider distribution options

The starting point was understanding of the need to distribute growth in a sequential fashion, in-line with the established hierarchy of places. The discussion considered ten separate levels within the hierarchy, ranging from Guildford town centre (top of the hierarchy, i.e. the location most suited to growth) to Green Belt sites around villages (bottom of the hierarchy, i.e. locations least suited to growth). For each level a conclusion was reached as to whether the approach to growth should be taken to be a ‘given’ or a ‘variable’, for the purposes of establishing spatial strategy alternatives. Options were then defined for each variable.

For example, in relation to Green Belt sites around villages, the conclusion was reached that there were four options to reflect across the reasonable alternatives: A) 2,035 dwellings at eight better performing sites; B) 2,135 dwellings at the same eight sites, plus an additional site at Send; C) 2,585 dwellings at the same eight sites, plus three additional sites at Send. The text explained the option of lower growth at Green Belt sites around villages as unreasonable, on the basis that such sites are necessary to ensure delivery of sufficient housing early in the plan period. Equally, the text explained the option of higher growth at Green Belt sites around villages as unreasonable, given a need to avoid allocation of high sensitivity Green Belt.

##### Step 3: Establish the reasonable alternatives

Eight reasonable spatial strategy alternatives were ultimately arrived at. The alternatives were presented in summary form in Table 6.1 of the report, in detail across Table 6.2, and also across a series of maps. In summary, the 2016 reasonable alternatives were as follows –

	No. homes	Distribution
1	13,844	Low growth everywhere except at the ‘Send amber sites’, where there is medium growth
2	14,294	Low growth everywhere except at the ‘Send amber sites’, where there is high growth
3	15,494	High growth everywhere except Wisley Airfield and Clandon Golf
4	15,844	High growth at Wisley Airfield enables the low growth elsewhere
5	16,394	As per (4), but with high growth at the Send amber sites
6	17,594	High growth at all locations except Clandon Golf
7	17,994	High growth at all locations except Liddington Hall
8	18,594	High growth at all locations

Wisley Airfield was a key variable, given its scale (2,100 homes). Without allocation of Wisley Airfield there was either a need to accept low growth overall (Options 1 and 2) or high growth at other locations (Option 3). Allocation of Wisley Airfield enabled the potential to provide for ‘OAHN plus a buffer’ whilst following a low growth strategy at other sensitive locations (Option 4).

Option 5 would involve addition of three additional sites at Send, as these are ‘least worst’ sites, including on the basis that they are assigned an amber rating (as opposed to a red rating) by the GBCS. Options 6 and 7 both involved further addition of one strategic urban extension to Guildford, whilst Option 8 involved further addition of both the strategic urban extension sites (i.e. both Clandon Golf and Liddington Hall).

#### Box 6.5: Conclusions of the 2016 appraisal of spatial strategy alternatives

“In conclusion, having ranked the performance of the alternatives in terms of each of the sustainability topics, and also identified/evaluated significant effects -

There is a strong argument for ruling out the ‘bookend’ options, notably -

- Option 1 - which performs poorly in terms of socio-economic objectives, with a number of significant negative effects predicted; and
- Option 8 - which performs poorly in terms of environmental objectives, and in terms of transport, with a number of significant negative effects predicted.

The mid-range options are all associated with pros and cons, and necessitate close consideration. Focusing on the mid-range options, points to note are -

- Communities - Option 4 (the preferred option) and Option 7 (high growth strategy including Clandon Golf) perform well as there will be a focus at strategic-scale schemes, each able to deliver a local centre and other strategic community infrastructure; and able to deliver secondary school provision.
- Economy - The Strategic Housing Market Assessment (SHMA) is clear that housing under-delivery within the West Surrey Housing Market Area (HMA), which is also a Functional Economic Market Area (FEMA), could result in economic growth opportunities going unrealised; hence options not making a contribution to meeting Woking’s unmet housing need (Options 1, 2, 3 and 4) would result in significant negative effects.
- Employment - Option 7 performs best as higher housing growth aligned with higher employment growth is to be supported at Guildford, from a pure national/regional economic growth perspective (leaving aside other, wider ranging considerations e.g. traffic congestion). Option 4 also performs well, whilst other options perform less well as there would be an undersupply of employment floorspace and/or the possibility of an imbalance between workforce and jobs locally.
- Housing - Higher growth options are to be supported given the importance of putting a buffer in place, in order to maximise the likelihood of Guildford delivering on its Objectively Assessed Housing Need (OAN) figure, and given the likelihood of housing undersupply within the HMA (arising from Woking).
- Landscape - Generally, the degree of impact increases in-line with the quantum of growth / number of sites, with the exception that Option 3 (development of sites at Send, Liddington Hall and Tongham) performs worse than Option 4 (the preferred option); with significant negative effects predicted where there would be a high risk of significant impacts to the AONB and/or AGLV.
- Transport - Generally, the degree of impact increases in-line with the quantum of growth / number of sites supported, with two exceptions; notably, Option 7 (Clandon Golf) performs better than Option 6 (Liddington Hall). With regard to effect significance, it is difficult to draw strong conclusions in the absence of detailed transport modelling evidence (a new Strategic Transport Assessment is in preparation, which will take account of proposed mitigation measures, e.g. junction upgrades); hence uncertain effects are predicted.

As such, it can be seen that there is no clear best performing, or ‘most sustainable’, option. Rather, there is a need to establish a preferred approach after having determined how best to ‘trade-off’ between competing objectives, and in-light of wide ranging perspectives.”

*Box 6.6: Council's response to spatial strategy alternatives appraisal 2016 (summarised)*

"The Council's preferred approach is Option 4, which the appraisal finds to perform relatively well, in that it stands out as performing well in terms of certain objectives (notably 'communities' and 'employment') and does not stand-out as performing poorly in terms of any objective.

However, the appraisal does highlight that Option 4 is non-ideal in terms of certain objectives. Specifically -

- Biodiversity - Whilst lower growth would be preferable from a biodiversity perspective, the Council does not support lower growth given housing and economy/employment considerations. Furthermore, there is confidence in the ability to mitigate impacts and indeed deliver targeted biodiversity enhancement through site-specific measures. It is recognised that Wisley Airfield is particularly sensitive from a biodiversity perspective; however, the site performs well as a location for growth in other respects, and SPA mitigation measures have been developed in-line with best practice.
- Climate change - Whilst higher growth options would perform better (on the assumption that additional development would be concentrated at strategic sites, and hence there would be good potential to deliver district heating schemes...), this is not an overriding consideration.
- Economy - The appraisal predicts significant negative effects to result from the preferred option, on the basis that it will not make a contribution to meeting unmet housing need within the HMA, which is also a FEMA. However, the Council believes that a positive strategy for economic growth is set to be put in place, ensuring that opportunities associated with Guildford Town and the A3 corridor are realised in full. Whilst additional housing in Guildford Borough might in theory support realisation of economic growth opportunities within the FEMA, in practice it is not clear that this would be the case.... Furthermore, the situation is complex given a need to avoid an imbalance of housing and employment locally (as this would have implications for commuting, and in turn traffic congestion), and given a need to recognise the constraints to growth that make Guildford an attractive location for business...
- Employment - The appraisal suggests that a higher growth option involving Clandon Golf would be preferable, as this site would deliver additional employment land; however, this site performs poorly in certain respects (e.g. landscape). The Council has put in place a balanced strategy for housing and employment growth that seeks to meet needs and also aligns with a strategy for infrastructure upgrades. Housing and employment growth at Clandon Golf would not align with the strategy, notably because it is divorced from the Sustainable Movement Corridor; and the employment proposed on this site is also less preferable compared to that at proposed allocations.
- Historic environment - Whilst lower growth would lead to fewer risks, there is confidence in the ability to avoid/mitigate effects through site-specific measures...
- Land - Whilst lower growth would obviously result in reduced loss of agricultural land, it is not clear that there are notable opportunities to make better use of lower quality agricultural land...
- Landscape - The appraisal finds the preferred option to perform well as a large scheme at Wisley Airfield avoids the need to place pressure on the most sensitive Green Belt and/or landscapes designated as being of larger-than-local importance... A strategic development at Blackwell Farm poses particular issues, from a landscape perspective, however a number of steps have been taken to minimise conflicts since the time of the 2014 draft plan...
- Housing - The preferred option performs well as it will put in place a strategy for meeting the borough's OAN; however, it is recognised that the strategy will likely result in unmet housing needs within the HMA (on the assumption that the Waverley Local Plan will not provide for all unmet needs arising from under-supply in Woking). Higher growth options would perform better, but would be problematic in terms of a range of environmental (and transport) issues/objectives, given local sensitivities...
- Transport - Whilst lower growth would lead to fewer risks, there is confidence in the detailed work that has been undertaken in support of the emerging preferred strategy... the preferred option is predicated on the delivery of the necessary infrastructure... [reference the Infrastructure Schedule accompanying the plan, planned transport infrastructure upgrades, the Sustainable Movement Corridor scheme and the fact that delivery of housing in the later stages of the plan period is dependent upon improvement to the A3]."



### C) Consultation responses

6.4.8

The consultation generated a high degree of interest, with approximately 32,000 comments received from approximately 6,000 individuals and bodies. Issues raised in relation to the spatial strategy included the following -

- The county council made no comments on the spatial strategy, but did state support for policies E1-E3, which dealt with meeting employment needs, stating: “We note the requirement for the provision of [employment land]... We support the policy for new floorspace to be directed first to Guildford town centre, then to locations within 500m of a public transport interchange and then to Office and Research and Development Strategic Employment Sites. This flexible approach should help ensure existing and future demand is accommodated... We would however be concerned about the delivery of the economy policies if one or more of the key development sites for employment use were not able to proceed due to transport or other reasons...”
- The Environment Agency made no comments on the spatial strategy, but did raise concerns regarding the evidence-base published as a means of justifying the spatial strategy, namely the published outcomes of the Flood Risk Sequential and Exception Tests and the Infrastructure Delivery Plan (specifically its provisions for waste water infrastructure). Concerns were also raised in respect of site specific policy for two proposed allocations – one in Guildford town centre and the other within the wider urban area – due to an absence of policy requirements dealing with safe access and egress.
- Highways England made no comments on the spatial strategy, but did state: “We support Guildford’s commitment to work with HE to develop improvements to the A3 and M25. It is noted from the Local Plan that the implementation of the three RIS schemes during the plan period is required in order to accommodate planned growth.”
- Historic England made no comments on the spatial strategy, stating: “... with regards to allocated sites, Historic England will be pleased to advise on development proposals as they come forward in respect of any effects on the historic environment or heritage assets within or in proximity to the sites.” Historic England did state that: “The Submission Local Plan seeks to achieve an appropriate balance between needs of protecting environmental qualities, including the historic environment, and the necessary growth and development to ensure Guildford’s continued vitality and economic, social and environmental sustainability.”
- The Home Builders Federation commented on Policy S2 (Spatial Strategy) stating: “The HBF is broadly very supportive of the assessment made. We consider this to provide a realistic assessment of the future housing needs of the borough. The only quibble we have is in the treatment of migration with London.” The HBF go on to suggest a need for an uplift to more fully account for London out-migration.
- M3 LEP concluded “On balance, Enterprise M3 LEP is supportive of Guildford’s Proposed Submission Local Plan and welcomes the strategy put forward to allow Guildford to continue to play a pivotal role in the economic prosperity of the M3 Corridor as one of the LEPs key Growth Towns. As mentioned above we would encourage the Council to give further consideration on how additional employment sites to meet the demand for office space within the town centre can be incorporated to support... continued growth.”
- Natural England made no comments on the spatial strategy. The response suggested a minor change to the Thames Basin Heaths Policy, and drew the Council’s attention to a recent precedent set in respect of planning for AONBs.
- RSPB has concerns regarding the proposed new settlement at Wisley Airfield. Main concerns relate to: the location of the SANG between the development and the SPA, on the basis that it could draw people towards the SPA; the design of the SANG (suggesting that there will be ‘pinch points’); and the existing Public Rights of Way compromising the SANG.
- Surrey Chambers of Commerce stated their support for the plan, in particular planned housing, employment land and transport infrastructure, and support for education.

- Surrey CPRE objected to a number of proposed allocations. Surrey CPRE also stated the following in relation to Policy S2 (Spatial Strategy): “GBC has not been able to prepare in time an acceptable plan for the town centre and the urban area of Guildford, causing undue emphasis to be switched to building on Green Belt countryside around the town... It is in our view essential to reconsider the proposals made regarding the priority given to retail and office development, which we believe to be overstated, rather than to housing at an appropriate density on brownfield sites in the town... We maintain that the gap town of Guildford is a “special case” and should be recognised as such from a planning viewpoint because of its widely protected countryside which should be an ongoing constraint on development and preclude major structural change along the lines proposed. We feel obliged to emphasise again the permanence of the Green Belt, the... AONB and the SPA.”
- Surrey Hills AONB Board objected to the quantum of growth proposed, and the proposed allocation at Blackwell Farm, suggesting that a recent Landscape Character Assessment (May 2016) concludes much of the site should be included within the AONB in Natural England’s Surrey Hills AONB Boundary Review.
- Surrey Wildlife Trust stated: “We... continue to object to the overall quantum of development as proposed here, in that it can only result in cumulative negative impacts on the borough’s natural environment... Where sites allocations propose the development of greenfield sites, we could only support these where the overall proposed built densities are convincingly [not] constrained by their adjacency/proximity to land of existing value for biodiversity conservation, and their potential value for enhancing landscape connectivity within Biodiversity Opportunity Areas may be fully realised.”
- Thames Water made no comments on the spatial strategy, but did state: “Water treatment and wastewater/sewage treatment capacity maybe a constraint in some catchments within the Guildford Borough area. As the Local Plan is finalised we will be reviewing which of our treatment sites need upgrades to accommodate the growth and we are willing to have a meeting with the Council to discuss this.”
- Several neighbouring local authorities responded:
  - Waverley Borough Council stated their support for Policy S2 (Spatial Strategy), stating “The Council supports the housing target set out in Policy S2, of providing for... the [OAHN] for Guildford Borough in the West Surrey SHMA. The Council also supports the provision in the plan of additional Gypsy/Traveller pitches.” WBC also stated their support for the employment land strategy, noting that provision was being made in accordance with the Guildford Employment Land Needs Assessment (ELNA).
  - Woking Borough Council stated: “The Council is aware of the information that Guildford Borough Council has provided to demonstrate that the unmet need from Woking cannot be met in Guildford. Once this evidence is agreed at the Examination, the Council is willing to cooperate with Guildford and Waverley Borough Councils to find ways of how the unmet need in the Housing Market Area can be addressed.”
  - Elmbridge Borough Council raised concerns regarding the allocation of Wisley Airfield, stating: “... we continue to question whether this is the right location for this scale of growth, when considered against the principles of the Green Belt... The site is located... where the Green Belt is already very fragmented and particularly vulnerable to additional development... It is therefore considered that further evidence should be provided to indicate why this site has been identified in preference to other sites having regard to the strategic significance of the Green Belt in this location.”
  - Spelthorne Borough supports the strategy of providing for the SHMA OAHN figure, and goes on to encourage GBC to ensure that densities are being maximized not just in Guildford town centre, but also public transport hubs and other suitable locations.
  - Rushmoor Borough Council is supportive of Guildford’s approach of “leaving no stone unturned” in seeking to meet its housing need.

## 6.5 Exploring growth quantum options in 2017

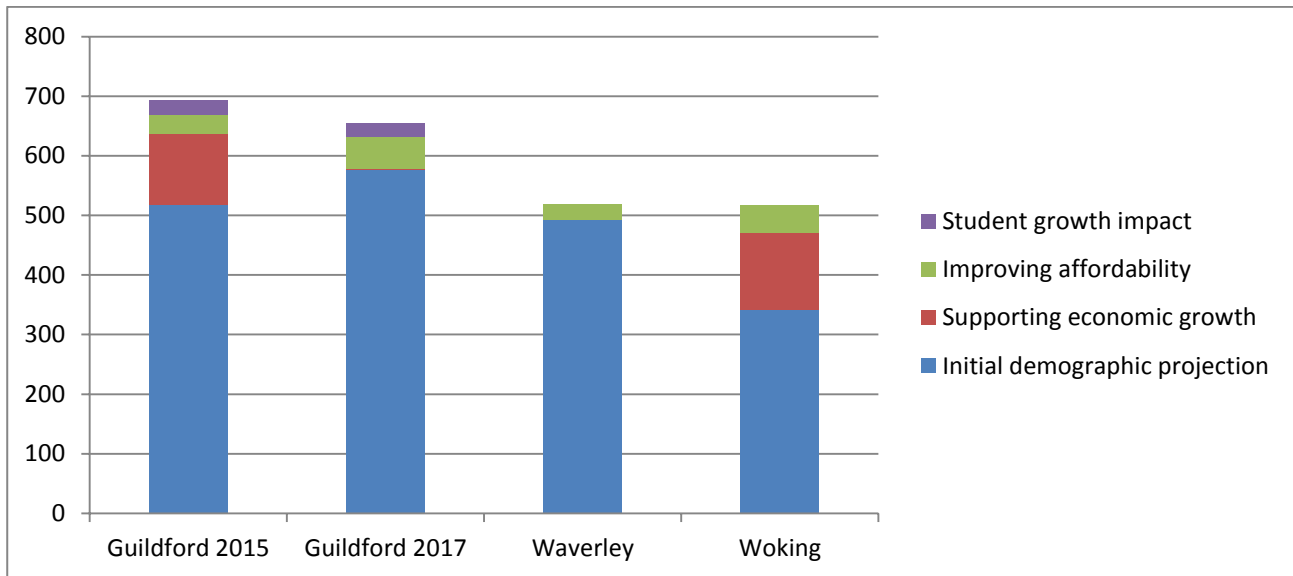
### The option of providing for OAHN

- 6.5.1 In line with para. 47 of the National Planning Policy Framework (NPPF), local planning authorities should: *“use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with [principles of sustainable development].”* As such –
- a Strategic Housing Market Assessment (**SHMA**) study for the West Surrey housing market area (HMA) - which comprises Guildford, Woking and Waverley - was published in September 2015, thereby superseding the draft West Surrey SHMA from 2014; and then
  - a Guildford **SHMA addendum** was published in 2017, providing a factual update for Guildford, reflecting the latest data (in particular, the 2015 mid-year population estimate, the 2014-based population and household projections and the latest economic forecasts).
- 6.5.2 The aim of SHMA is to establish Objectively Assessed Housing Needs (**OAHN**) at the functional scale of the West Surrey HMA, and also for the component authorities. The SHMA goes through a number of considerations in turn, before arriving at final OAHN figures – see **Box 6.7**. Taking account of demographic needs and uplifts, the conclusion of the SHMA Addendum (2017) is that Guildford Borough’s OAHN is **654 dpa**, or **12,426 in total** (2015-34).
- 6.5.3 **Figure 6.3** shows the breakdown of the current Guildford OAHN (2015-34), and also the previous OAHN (2014-33), as assigned by the 2015 SHMA. Figure 6.3 also shows the breakdown of OAHN for Woking and Waverley, as assigned by the 2015 SHMA.

#### Box 6.7: Steps taken by the West Surrey SHMA (2015) and Addendum (2017) to establish OAHN

- The starting point is the latest Office of National Statistics (ONS) household projections, which are based on past trends, influenced by the balance of people moving in and out of an area (migration) and by household formation rates (e.g. a household forms when a young person moves out of the family home). These matters are considered within Chapter 4 of the SHMA (2015) and Chapter 3 of the Addendum (2017). A series of sensitivity tests are applied (e.g. giving consideration to whether ONS migration rates should be adjusted upwards to better reflect likely future migration out of London) before the conclusion is reached that demographic need is as per the national projections, i.e. there is insufficient evidence to justify deviation. The Addendum finds demographic need to be higher than the 2015 SHMA, at **577 dpa**.
- The next step is to consider whether the demographic need figure should be adjusted upwards ('uplifted') in order to support expected economic growth (without increasing in-commuting). This is dealt with in Chapter 5 of the SHMA (2015) and Chapter 4 of the Addendum (2017). The Addendum finds a need for a very small uplift of just 2 dpa, which is a considerable deviation from the SHMA 2015 (120 dpa). This is primarily because updated employment growth forecasts (from Nov/ Dec 2016) are lower, although there are other factors that come into play. The uplifted figure is **579 dpa**.
- The next step is to consider an uplift to address affordable housing needs, and 'signals' from the housing market. This is dealt with in Chapters 6 and 7 of the SHMA (2015) and Chapter 5 of the Addendum (2017). With regards to affordable housing, the Addendum finds that there are 517 new households per annum that require financial support to meet their housing needs, which is a figure 14% higher than the 2015 SHMA. Meeting this need in full, based on 40% affordable housing delivery, would notionally require almost 1,300 dpa; however, the calculation is in fact more complex. With regards to market signals, the Addendum reaches a conclusion similar to the 2015 SHMA, finding that longer-term trends for house prices and rental prices does signal poor affordability. The Addendum concludes a need for a further uplift of 52 dpa; higher than the 2015 uplift of 31 dpa. The further uplifted figure is **631 dpa**.
- The next step is to consider an uplift for student needs. This is covered within Chapter 4 of the SHMA (2015) and Chapter 7 of the Addendum (2017). An updated assessment of growth in students indicates that the number of full-time Guildford-based students is expected to increase from 10,700 to around 14,500 over the next ten years, with 45% living in the wider housing market (as opposed to halls of residence). On the basis of an average 4 students per household, this necessitates an uplift of 23 dpa, which is very similar to the uplift identified as necessary by the SHMA 2015. The further uplifted figure is **654 dpa**.

Figure 6.3: OAHN within the West Surrey HMA



#### Options providing for below OAHN

6.5.4 Guildford Borough Council is committed to delivering its OAHN figure, having established that there is no potential to justifiably ‘under-deliver’ and rely on neighbouring authorities to meet the shortfall (under the Duty to Cooperate). Whilst Guildford Borough is heavily constrained environmentally, it does not *stand-out* as relatively constrained in the sub-regional context. This conclusion is reached on the basis of Duty to Cooperate discussions, past SA work (notably spatial strategy alternatives appraisal in 2013/14 – see discussion above), an understanding of precedents being set elsewhere, and other sources of evidence. It is evidently the case that under-supplying in Guildford would lead to a range of socio-economic problems, given that Woking is already under-supplying within the HMA (see below). There is an argument for under-supplying to be preferable from an environmental perspective; however, this argument is far from clear cut given an assumption that unmet needs would have to be met elsewhere within the HMA (i.e. within Waverley, which is heavily constrained) or elsewhere within a constrained sub-region. For these outline reasons, lower growth options - i.e. options that would involve planning for a level of growth below that necessary to meet OAHN - were determined to be **unreasonable**.<sup>18</sup>

#### Options providing for above OAHN

6.5.5 However, delivering a quantum of growth to meet the borough’s OAHN is not the only option. There is also the need to consider the possibility of delivering higher growth in order to meet unmet needs arising from elsewhere within the HMA, and therefore ensure that there is not an under-supply of housing at the HMA-scale. Guildford Borough has not been formally asked by either of the two other authorities within the HMA to meet unmet needs arising from within their areas; however, there is a risk of unmet needs arising from Woking, and there is little reason to suggest that the Waverley Local Plan will make provision for Woking’s unmet needs (see **Box 6.8**). As such, it is **reasonable** to consider options that would involve delivering a proportion – and potentially a high proportion - of Woking’s unmet needs. The matter of precisely what proportion is returned to below, in Section 6.7.

<sup>18</sup> To reiterate, in-line with Regulations, there is a need to give ‘an outline of the reasons’ when introducing the ‘reasonable alternatives’, i.e. when explaining options that are reasonable and unreasonable.

#### Box 6.8: Likely unmet needs within the HMA

The 2015 West Surrey SHMA assigns Woking an OAHN figure of 517 dpa, from a base date of 2013/14. In contrast, the adopted Woking Core Strategy makes provision for 292 dpa over the period 2012-2027.

These figures indicate an unmet need figure of 225 dpa (517 – 292) over the period 2013/14 – 2026/27, or 3,150 dwellings. However, there are some other considerations, including -

- This might be subject to change if reassessed using the latest projections and forecasts.
- Woking's emerging Site Allocations Plan could conceivably allocate land to provide for more than the Core Strategy requirement (i.e. more than 292 dpa), thereby reducing the unmet need figure. On the basis of the most recently available consultation document, it is understood that the intention is to provide for the Core Strategy figure only; however, the proposal is also to safeguard two sites, with a capacity of c. 1,250 homes, plus non-preferred safeguarding sites with a similar capacity have been consulted on. Both Guildford and Waverley Borough Councils responded to the recent consultation, encouraging Woking to consider allocating as much suitable land as possible during the current plan period, rather than safeguarding land for delivery during the next plan period.<sup>19</sup>

There is little reason to suggest that the Waverley Local Plan will provide for any of Woking's unmet needs, with the 'submission' version of the Local Plan (2017) seeking to provide for Waverley's OAHN figure only. It is conceivable that the Waverley Local Plan could eventually provide for higher growth (e.g. because sites are added to the strategy, as part of the Local Plan's Examination) or lower growth (e.g. because the Dunsfold Aerodrome strategic site cannot be allocated, recognising that an approved planning application was recently called-in by the Secretary of State); however, there is no certainty.

In conclusion, a best guess estimate of unmet needs from within the HMA is **3,150 dwellings**.

## 6.6 Exploring distribution options in 2017

### Introduction

- 6.6.1 As per the approach proposed in 2013, and then applied in 2014 and 2016, when considering distribution options there is a need to recognise that a hierarchy of places / growth locations, or **spatial hierarchy**, exists within Guildford Borough, with **ten tiers** having been defined.
- 6.6.2 The need to distribute growth in a sequential fashion, in-line with the spatial hierarchy, is an important consideration when examining the 'reasonableness' of a given distribution option. However, there are also other considerations. Notably, there is a need to support sites that:
- A) are well located and relatively unconstrained (see site options analysis in Appendix IV);
  - B) are deliverable, in that homes can be delivered, particularly in the first five years; and/or
  - C) bring wider benefits, e.g. employment land, Traveller pitches, strategic infrastructure.
- 6.6.3 *With these points in mind*, the following headings consider each of the tiers of the spatial hierarchy in turn, asking the following questions:
- Should the approach to growth be taken as a '**given**' or a **variable**, for the purposes of establishing reasonable spatial strategy alternatives?
  - Where the approach to growth should be taken as a variable, what **options** should be tested through / reflected across the spatial strategy alternatives?

<sup>19</sup> Woking consulted on a draft version of their Site Allocations DPD in 2015, and then held a targeted consultation in 2017. The targeted consultation concerned the approach to safeguarded land, with the proposal put forward to safeguard a large site known as Martyrs Lane, plus one other smaller site (GB9), instead of safeguarding the series of sites proposed in 2015.



### Tier 1 - Guildford town centre

- 6.6.4 In-line with the sequential approach, there is a need to maximise growth in Guildford town centre, which means allocating or supporting land (henceforth 'supporting')<sup>20</sup> for 1,150 dwellings. Whilst there are additional sites that could conceivably be supported in order to deliver a higher number, there is little to suggest the potential to do so sustainably,<sup>21</sup> and so 1,150 dwellings was identified as a **'given'** for the purposes of developing spatial strategy alternatives.

N.B. the figure of 1,150 is 22 homes lower than the equivalent figure in 2016 (1,172 homes). The change reflects A) planning permissions; B) removal of the Telephone Exchange, Leapale Road (100 homes), on the basis that it is unavailable in the plan period; and C) addition of 200 homes at the North Street redevelopment, which is now understood to be suited to higher density development, given its central location.

### Tier 2 - Guildford urban area

- 6.6.5 In-line with the sequential approach, the next location at which to maximise growth – i.e. deliver as much of the residual housing as possible - is the wider Guildford urban area. This means supporting 1,368 dwellings. Whilst there are additional sites that could conceivably be supported in order to deliver a higher number, there is little to suggest the potential to do so sustainably,<sup>22</sup> and so 1,368 dwellings was identified as a **'given'** for the purposes of developing spatial strategy alternatives.

N.B. the figure of 1,368 is 120 fewer than the equivalent figure in 2016 (1,570 homes). This reflects A) planning permissions; and B) removal of Land at Guildford College (100 homes), which is not being progressed by the land owner as student accommodation.

### Tier 3 - Ash and Tongham urban area

- 6.6.6 In-line with the sequential approach, the next location at which to maximise growth – i.e. deliver as much of the residual housing as possible - is the Ash and Tongham urban area. This means supporting 79 dwellings. Whilst there are additional sites that could conceivably be supported in order to deliver a higher number, there is little to suggest the potential to do so sustainably,<sup>23</sup> and so 79 dwellings was identified as a **'given'** for the purposes of developing alternatives.

N.B. the figure of 79 is 12 fewer than the equivalent figure in 2016 (91 homes) due to planning permissions since 2016.

<sup>20</sup> Some of the sites in the Land Availability Assessment (LAA), where development is assumed within the plan period, have a capacity of less than approximately 25 homes, and therefore are not to be allocated through the Local Plan.

<sup>21</sup> Appendix E of the LAA lists a number of discounted sites, all of which are discounted for clear-cut planning reasons. Ten have been supported through the plan in the past; however, subsequent work served to demonstrate more limited capacity within the town centre, particularly due to flood risk. The capacity of the town centre will be the focus of further work in the near future, including work that will examine how to mitigate flood risk. Furthermore, work is being undertaken in respect of land assembly, i.e. addressing the deliverability problems that arise due to multiple land ownership or multiple/long term leaseholds. Outside of the Local Plan process, the Council has a Major Projects team who are working to unlock the potential delivery of sites across the Guildford urban area.

<sup>22</sup> Appendix E of the LAA lists a number of discounted sites, all of which are discounted for clear-cut planning reasons (albeit two have been supported through the plan in the past). N.B. The 1,368 figure was arrived at after having given careful consideration to the quantum of growth that come forward through the Slyfield Area Regeneration Project (SARP) in particular. The SARP is a major urban regeneration scheme covering more than 40 hectares of land adjacent to the Slyfield Industrial Estate and residential area, towards the northern edge of Guildford. The Thames Water sewage treatment facility and Council depot will be re-provided within the site releasing land for new homes and supporting infrastructure. Feasibility studies have tested a mixture of residential densities ranging from 1,000 units up to 2,250 units, and the current view is that 1,000 dwellings will be delivered during the plan period.

<sup>23</sup> Appendix E of the LAA lists a number of discounted sites, all of which are discounted for clear-cut planning reasons (albeit two have been supported through the plan in the past). The majority of discounted sites are either employment land to be retained, within 400m of the Thames Basing Heaths SPA or of uncertain availability.

#### Tier 4 - Built up area of villages

- 6.6.7 In-line with the sequential approach, the next locations at which to maximise growth – i.e. deliver as much of the residual housing as possible – are locations within the built up area of villages. This means supporting 140 dwellings. Whilst there are additional sites that could conceivably be supported in order to deliver a higher number, there is little to suggest the potential to do so sustainably,<sup>24</sup> and so 140 dwellings was identified as a **‘given’** for the purposes of developing alternatives.

N.B. the figure of 140 is 55 fewer than the equivalent figure in 2016 (195 homes). This reflects A) planning permissions; and B) removal of Hotel, Guildford Road, East Horsley (48 homes), which should remain in its current use.

#### Tier 5 - Village ‘gap’ sites<sup>25</sup>

- 6.6.8 In-line with the sequential approach, the next locations at which to maximise growth – i.e. deliver as much of the residual housing as possible – are locations within proposed Green Belt boundaries, but outside the current built up area, or ‘gap’ sites. This means supporting 245 dwellings. Whilst there are additional sites that could conceivably be supported in order to deliver a higher number, there is little to suggest the potential to do so sustainably,<sup>26</sup> and so 245 dwellings was identified as a **‘given’** for the purposes of developing alternatives.

N.B. the figure of 245 is 9 more than the equivalent figure in 2016 (236 homes). This reflects A) planning permissions; and B) a decision to increase the number of homes at Clockbarn Nursery, Tannery Lane, Send (by 15 homes).

#### Tier 6 - Brownfield in the Green Belt

- 6.6.9 In-line with the sequential approach, the next locations at which to maximise growth – i.e. deliver as much of the residual housing as possible – are previously developed ‘brownfield’ sites in the Green Belt. This means supporting 199 dwellings. Whilst there are additional sites that could conceivably be supported in order to deliver a higher number, there is little to suggest the potential to do so sustainably,<sup>27</sup> and so 199 dwellings was identified as a **‘given’** for the purposes of developing alternatives.

N.B. the figure of 199 is 100 fewer than the equivalent figure in 2016 (299 homes). This reflects removal of Broadford Business Park, Shalford. Since the last iteration of the plan the Council has reconsidered change of use at this site, given continued loss of employment sites to housing elsewhere, due to permitted development rights. Retention of Broadford, as an established business park, helps ensure a variety and mix of floorspace in the borough.

<sup>24</sup> Appendix E of the LAA lists a number of discounted sites, all of which are discounted for clear-cut planning reasons (albeit two have been supported through the plan in the past). Sites are subject to a range of constraints, including location within a Conservation Area.

<sup>25</sup> Gap sites fall within proposed Green Belt boundaries, but outside the built up area. Green Belt boundaries were assessed as part of Volume IV of the Green Belt and Countryside Study, which looked at which parts of villages contribute to openness (NPPF para 86).

<sup>26</sup> Appendix E of the LAA lists a number of discounted sites, all of which are discounted for clear-cut planning reasons (albeit one has been supported through the plan in the past). A number of discounted sites have ‘availability concerns’.

<sup>27</sup> Appendix E of the LAA lists a number of discounted sites, all of which are discounted for clear-cut planning reasons (albeit one has been supported through the plan in the past). A number of discounted sites are associated with questionable brownfield status and/or availability issues.

**Tier 7 - Countryside beyond the Green Belt (CBGB)<sup>28</sup>**

- 6.6.10 In-line with the sequential approach, the next location at which to maximise growth – i.e. deliver as much of the residual housing as possible – is the CBGB, which is found in the west of the B, around the Ash/Tongham urban area and around the village of Ash Green. However, there is a question-mark regarding precisely what maximising growth (sustainably) means in practice, given some notable planning issues. It is not ‘a given’ that growth should be maximised, despite the fact that any decision to not allocate would increase pressure on locations lower down the hierarchy (i.e. locations discussed under the bullet points below). As such, the approach to growth within the CBGB was identified as **a variable**, for the purposes of developing spatial strategy alternatives. The **options** are:

- A) Lower growth around Ash/Tongham (1,146 dwellings); and
- B) Higher growth around Ash/Tongham (1,146 + 600 dwellings) – through additional allocation of Land to the east of the Street, Tongham.<sup>29</sup>

N.B. the figures of 1,146 and 1,746 are 89 fewer than the equivalent figures in 2016, due to recent planning permissions.

**Tier 8 - Green Belt around Guildford<sup>28</sup>**

- 6.6.11 In-line with the sequential approach, the next location at which to maximise growth – i.e. deliver as much of the residual housing as possible – is at Green Belt sites around the edge of the Guildford urban area. However, again there is a question-mark regarding precisely what this means in practice, given planning issues. Again, it is not ‘a given’ that growth should be maximised, despite the fact that any decision to not allocate would increase pressure on locations lower down the hierarchy. As such, the approach to growth here was identified as **a variable**, for the purposes of developing spatial strategy alternatives. The **options** are:

- A) 3,350 dwellings at the three sites of Blackwell Farm, Gosden Hill Farm and Keens Lane
- B) 4,350 dwellings at the (A) sites, plus Clandon Golf.

N.B. these options are different to the equivalent options from 2016. See further explanation of these options in Box 6.9.

**Tier 9 - New settlement<sup>28</sup>**

- 6.6.12 In-line with the sequential approach, the next location at which to maximise growth is at a new settlement. The Council has supported the option of a new settlement since 2013/14, when the principle was established through consultation. Also, at this time, it was established that **Wisley airfield** is the only realistic site in contention. This remains the Council’s view at the current time. As such, the approach to growth here was identified as **a ‘given’**, for the purposes of developing spatial strategy alternatives. The site capacity is 2,000 homes.

N.B. This is an evolution of the position in 2016, when Wisley Airfield was taken to be a ‘variable’. This position in 2016 reflected a decision taken by GBC Planning Committee (in-line with a recommendation by Development Management Officers) in April 2016 to refuse a planning application, on a number of grounds. However, work was subsequently undertaken by site promoters, in collaboration with the Council, to consider means of addressing the various ground for refusal. The outcome was a greater degree of confidence in the potential for a new settlement at the site to be suitable, with the right planning application.

<sup>28</sup> Sites in tiers 7 - 10 are shown in **Figure 6.3**, below.

<sup>29</sup> A number of additional discounted sites listed in Appendix E of the LAA, which could conceivably be allocated, in order to deliver a higher growth option; however, all are unavailable or unsuitable.



*Box 6.9: Green Belt site options around the Guildford urban area*

There are five Green Belt site options around Guildford 'in the mix':<sup>30</sup>

- Blackwell Farm to the south-west performs relatively well, as there is the potential to facilitate delivery of new strategic infrastructure - including a secondary school and a rail station - and enable an extension to the Surrey Research Park; also, development would *mostly* avoid the loss of Green Belt identified as most sensitive ('red-rated') by the Green Belt and Countryside Study (GBCS; see Figure 6.4).<sup>31</sup> As such, an urban extension here was identified as a **'given'** for the purposes of developing spatial strategy alternatives. With regards to site capacity, a figure of 1,500 *in the plan period* was established as a 'given'. This figure is lower than the equivalent figure proposed in 2014, reflecting a reduction in the overall site size to avoid red-rated Green Belt and AONB, and minimise development on Area of Great Landscape Value (AGLV)).<sup>32</sup> Also, the figure is 300 fewer than the equivalent 2016 figure, reflecting revised delivery rate expectations, i.e. there is now an expectation that 300 of the dwellings will be delivered post 2034.
- Gosden Hill Farm to the north-east also performs relatively well, as there is the potential to facilitate delivery of new strategic infrastructure - including a secondary school and a rail station - and development would not result in the loss of red-rated Green Belt (see Figure 6.4). As such, an urban extension here was identified as a **'given'** for the purposes of developing spatial strategy alternatives. With regards to site capacity a figure of 1,700 *in the plan period* was established as a 'given'. This figure is 300 fewer than the equivalent 2016 figure, reflecting revised delivery rate expectations. Also, the site area is increased from that proposed in 2014 to ensure that 2,000 homes is capable of being delivered at an appropriate density and to enable the delivery of the necessary infrastructure, notably the new school.
- Land north of Keens Lane, to the north / north west, is a smaller site. A care home would be delivered as part of the scheme, and development here is associated with no major issues (on the assumption that measures are in place to ensure no impact to the nearby Thames Basin Heaths SPA); hence a 150 home scheme here was identified as a **'given'** for the purposes of developing spatial strategy alternatives.
- Clandon Golf to the south-east performs less well. The site comprises red-rated Green Belt (see Figure 6.4), borders the AONB and comprises AGLV. The site could deliver some (limited) employment and a new secondary school; however, a new secondary school at nearby Gosden Hill Farm combined with one at Wisley airfield is the preferable option. As such, this site was identified as a **variable** for the purposes of developing spatial strategy alternatives. There is a need to consider the possibility of allocating the site for 1,000 homes; however, there is also a need to consider the possibility of not allocating.
- Liddington Hall (600 homes) to the north-west performs least well. The site comprises red-rated Green Belt (see Figure 6.4), and is subject to transport issues in the early part of the plan period. As such, non-allocation of this site was identified as a **'given'** for the purposes of developing spatial strategy alternatives.

N.B. Understanding of the transport constraint has clarified since early 2016, i.e. the last time that consideration was given to the 'reasonableness' of Liddington Hall as an option. If built, residents would add traffic onto a congested stretch of the A3 that has been identified for improvements as part of Highways England's RIS2 scheme. Transport constraints apply less in the latter part of the plan period, subsequent to RIS2; however, other sequentially preferable sites are set to deliver at this time. Allocation would be a reasonable option if the site could deliver early in the plan period; however, it cannot.<sup>33</sup>

On the basis of the above discussion, a sequential approach emerges - with development at the first three sites supported; development at the fourth sites potentially supported, i.e. supported if necessary/appropriate in order to minimise development around villages; and development at the fifth site not supported. As such, there are two 'development at Green Belt sites around Guildford' **options**:

- 1) 3,350 dwellings at the three sites of Blackwell Farm, Gosden Hill Farm and Keens Lane
- 2) 4,350 dwellings at the (A) sites, plus Clandon Golf.

<sup>30</sup> Reasonable site options are those that were identified by the Green Belt and Countryside Study (GBCS) and are either A) listed in the LAA as 'a realistic candidate for development' (Appendix B); or B) as a 'discounted site' (Appendix E).

<sup>31</sup> Red-rated Green Belt land would not be lost to deliver the site itself, but would be lost to deliver an expanded existing access road (plus this land is partly AONB/AGLV, i.e. designated for landscape value).

<sup>32</sup> To be clear, originally the proposal was to deliver a larger site, with access via a new junction with the A31 and a substantial new road. More recently, the proposal is to deliver a reduced site, with access achieved by the widening an existing road.

<sup>33</sup> There is a need to contrast Liddington Hall with Blackwall Farm, which will also affect the same congested stretch of the A3. The difference is that Blackwell Farm would deliver an additional access from the A31, which would help alleviate current congestion in this area and provide some capacity on the A3 prior to RIS2.

Tier 10 - Green Belt around villages<sup>28</sup>

- 6.6.13 In-line with the sequential approach, the final location at which to deliver growth is at Green Belt sites around the villages. There is feasibly the option of delivering nil growth at these locations; however, there is a strategic argument for some growth at villages, and several sites do have merit. The option of delivering the total quantum of growth around villages that was proposed - and strongly objected to - in 2014 can be ruled-out, but it remains the case that significant growth around villages is necessary.
- 6.6.14 Specifically, the following sites are broadly supported and hence were identified as 'givens' for the purposes of developing alternatives:
- Site A - Land west of Winds Ridge and Send Hill, Send (40 homes) – green-rated Green Belt, and is partly Council-owned, hence has potential to deliver a Traveller site.
  - Sites B, C and D - Three sites at 'the Horsleys' (Clandon and Horsley Ward) (355 homes) - green-rated Green Belt, and are close to the train station and East Horsley district centre.
  - Site E - Land at Garlick's Arch, Send Marsh / Burnt Common (Send and Lovelace Ward) (400 homes) - amber-rated Green Belt, and subject to some constraints (see Appendix IV), but would support delivery of A3 junction upgrades, and would deliver a Travelling Showpeople site in an appropriate location.
- 6.6.15 Other reasonable site options<sup>34</sup> perform less well, as they comprise higher sensitivity Green Belt (see Figure 6.4) and/or would not deliver wider benefits and/or are otherwise constrained. However, there is another factor, namely the pressure to allocate sites that are able to deliver in the first five years. Smaller sites at villages tend to be relatively easy to deliver.
- 6.6.16 In light of this factor there is a need to consider the option of allocating additional village sites. The following sites come into contention –
- Site F - Aldertons Farm, Send Marsh Road, Send (100 homes) – amber rated Green Belt and not subject to any strategic constraints.
  - Site G - Land to the north east of Flexford (East of Glaziers Lane), Flexford (Normandy Ward) (100 homes) – red-rated Green Belt and would introduce in-depth built form north of the railway line; however, very close proximity to Wanborough train station.
  - Site H - Land south of Halfway House (Aaron's Hill), Upper Eashing, Godalming (Pilgrims Ward) (200 homes) – red-rated Green Belt, AGLV, and not identified as a PDA within the GBCS; however, Waverley's Local Plan Part 1 identifies the site.
  - Site I - Hornhatch Farm, Chilworth (Shalford Ward) (80 homes) – red-rated Green Belt; however, not subject to any other strategic constraints. It is sequentially preferable to other sites, once account is taken not only of site specific issues, but also settlement specific constraints – see further discussion within Box 6.10.
- 6.6.17 As such, the approach to growth at Green Belt sites around villages was identified as a **variable**, for the purposes of developing spatial strategy alternatives. The **options** are:
- A) 795 dwellings at Sites A, B, C, D, E;
  - B) 1,275 at Sites A, B, C, D, E, F, G, H, I.

N.B. these are different to the equivalent options from 2016. See explanation in Box 6.10.

<sup>34</sup> Reasonable site options are those that were identified by the Green Belt and Countryside Study (GBCS) and are either A) listed in the LAA as 'a realistic candidate for development' (Appendix B); or B) as a 'discounted site' (Appendix E).

#### Box 6.10: Green Belt site options around villages

Reasonable village Green Belt site options are those identified in the Green Belt and Countryside Study (GBCS) and listed in the LAA as either A) 'a realistic candidate for development' (Appendix B); or B) a 'discounted site' (Appendix E). On this basis, there are 31 reasonable options:<sup>35</sup>

- The five sites discussed at para 6.6.14 are a **'given'** for the purposes of developing spatial strategy alternatives. These five sites had the same status in 2016, although the mix of uses at one site - Garlick's Arch, Send Marsh – is now significantly different.
- The four sites at para 6.6.16 form a second tier of sites that potentially have some merit, i.e. sites that should be a **variable** across the spatial strategy alternatives. One of these four sites, 'Aldertons Farm' had the same status in 2016; however, the status of the other three sites has changed:
  - East of Glaziers Lane, Flexford (Normandy Ward) – was not reflected in the 2016 alternatives on the basis that it comprises red-rated Green Belt, and on the basis that Normandy/Flexford was set to receive a large amount of growth at other sequentially preferable sites. However, the sites understood to be sequentially preferable in 2016 have now been ruled-out (see below).
  - Aarons Hill, Godalming (Pilgrims Ward) – was not reflected in the 2016 alternatives on the basis that it comprises red-rated Green Belt; however, the situation has now changed as a result of Waverley's submitted Local Plan Part 1, which supports the site. Also, the situation has now changed in that sites understood to be sequentially preferable in 2016 have now been ruled-out (see below).
  - Hornhatch Farm, Chilworth (Shalford Ward) - was not reflected in the 2016 spatial strategy alternatives on the basis that it comprises red-rated Green Belt. However, the situation has changed in that sites understood to be sequentially preferable in 2016 have now been ruled-out (see below).
- The remaining 22 sites that are listed within Appendix E as having been identified as PDAs through the GBCS are ruled-out, i.e. it is a **'given'**, for the purposes of developing spatial strategy alternatives, that they should not be allocated. The majority were similarly ruled-out in 2016. Most are red-rated Green Belt, although not all.<sup>36</sup> The status of the following four sites has changed -
  - Land at Normandy / Flexford (Normandy Ward) – 1,100 dwellings was a 'given' in 2016, despite red-rated Green Belt, on the basis of its ability to provide a secondary school in the west of the borough. However, the Blackwell Farm site - a preferable location - can now provide a secondary school.
  - East of the Paddocks, Flexford (Normandy Ward) - 50 dwellings was a 'given' in 2016, on the basis that the site comprises green-rated Green Belt. However, Since the consultation, its Site of Nature Conservation Interest (SNCI) status has been confirmed.
  - South of West Horsley (Clandon and Horsley Ward) - 90 dwellings was a 'given' in 2016, on the basis that the site comprises green-rated Green Belt. Representations from the land-owner then established a desire to relocate the village primary school on to the site; however, deliverability is uncertain.
  - Greater expansion of Send (south west) – 400 dwellings was an option in 2016. However, part of the site is now known to be better suited to employment development.

<sup>35</sup> The LAA actually lists 45 sites, but some would only ever come forward in combination. **Appendix IV** considers the 31 sites.

<sup>36</sup> Notable 'ruled-out' sites include the following:

A) One site at Normandy comprises amber-rated Green Belt - i.e. less sensitive Green Belt than the East of Glaziers Lane site discussed above as a 'variable' - nonetheless, this site is sequentially less preferable and hence is ruled-out. The site is on the edge of the village, relatively distant from the train station; and there is a need to limit growth at this rural settlement.

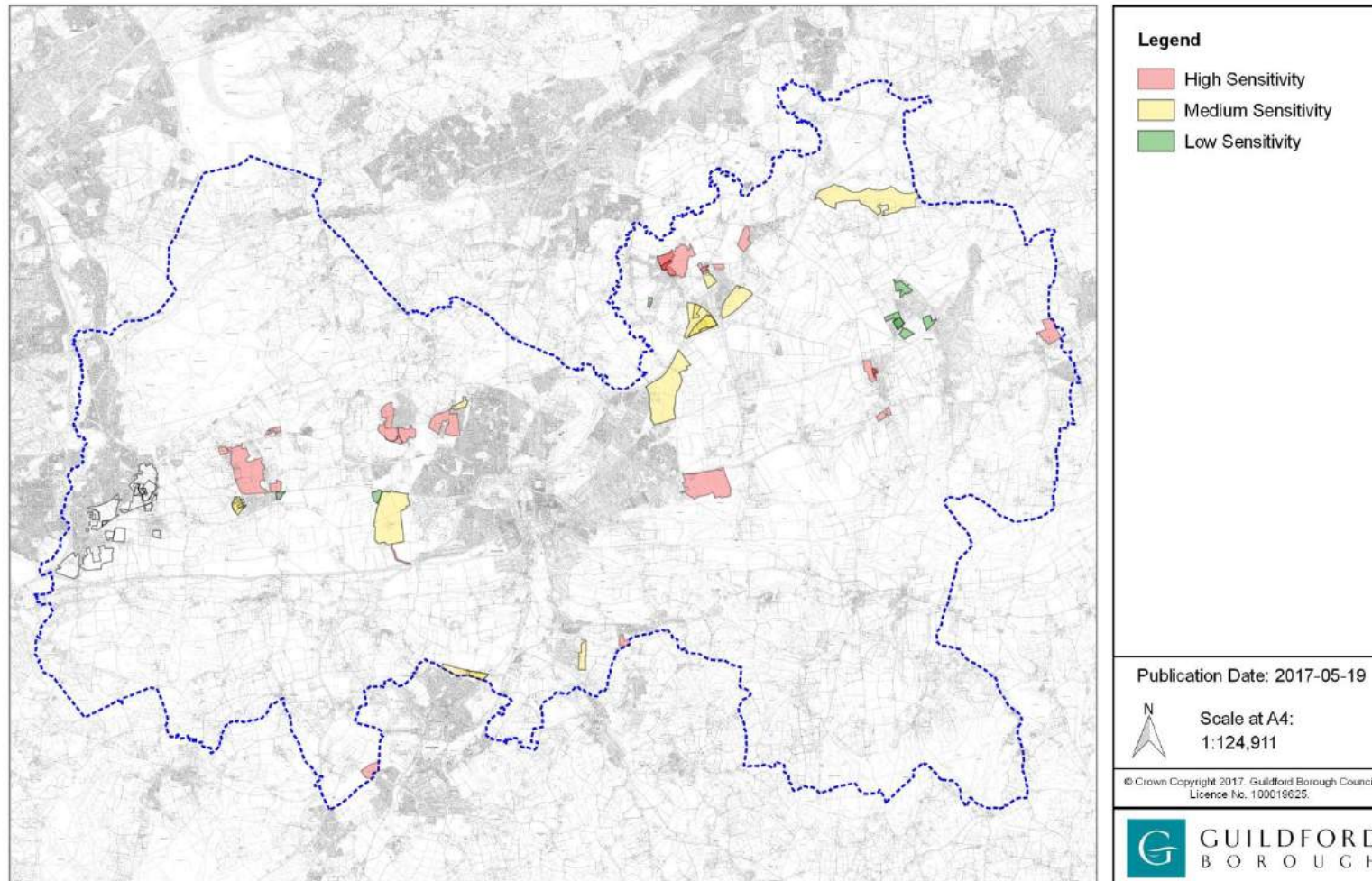
B) Two amber rated sites in Shalford Ward, which are sequentially less preferable to the Hornhatch Farm site discussed above as a 'variable'. One site is constrained by access, and the other by the AONB.

C) One site in Effingham Ward would involve a large scheme delivering a relocated secondary school; however, relocation is not necessary and the site comprises red-rated Green Belt.

D) Three sites at Worpleston Ward are in relatively close proximity to Guildford, but development would create traffic issues in the early part of the plan period, as per Liddington Hall.

E) There are a number of red-rated sites at Send and Ripley; however, these sites are not sequentially preferable to the sites discussed above, and there is a limit to the quantum of growth that could be sustainably accommodated in this part of the borough.

Figure 6.4: Sites in tiers 7 - 10, with those in the Green Belt classified according to sensitivity<sup>37</sup>



<sup>37</sup> Green Belt sensitivity was examined through the **Green Belt and Countryside Study** in 2013, and then reviewed in 2014 ('Volume II addendum') resulting in a district-wide map categorising each Green Belt parcel on a red/amber/green ('RAG') scale (red = high sensitivity) - see [www.guildford.gov.uk/media/16835/Appendix-2-Green-Belt-Sensitivity-Map/pdf/Appendix\\_2\\_Green\\_Belt\\_Sensitivity\\_Map.pdf](http://www.guildford.gov.uk/media/16835/Appendix-2-Green-Belt-Sensitivity-Map/pdf/Appendix_2_Green_Belt_Sensitivity_Map.pdf)



## 6.7 Establishing the reasonable alternatives in 2017

6.7.1 The discussion above identifies a series of ‘givens’ and three ‘variables’. For each variable, two options are identified: low and high growth. The variables/options are -

- 1) CBGB - 1,146 or 1,746 dwellings
- 2) Guildford GB - 3,350 or 4,350 dwellings
- 3) Villages GB - 795 or 1,275 dwellings

6.7.2 This leads to the alternatives presented in Table 6.2.

Table 6.2: Spatial strategy alternatives emerging from Step 2

Option	Givens <sup>38</sup>	Variables	Quantum	Relationship to OAHN
1	8,309	Lower growth options	13,600	+ 9.4%
2		Higher growth option for variable 3.	14,080	+ 13.3%
3		Higher growth option for variable 1	14,200	+ 14.3%
4		Higher growth option for variable 2	14,600	+ 17.5%
5		Higher growth option for variables 1 and 3	14,680	+ 18.1%
6		Higher growth option for variables 2 and 3	15,080	+ 21.4%
7		Higher growth option for variables 1 and 2	15,200	+ 22.3%
8		Higher growth option for all three variables	15,680	+ 26.2%

6.7.3 It was determined that these could be taken as the ‘reasonable alternatives’, after having established that –

- Option 1 is a reasonable low growth option – any lower growth option would involve putting in place an insufficiently small contingency, or ‘buffer’. There is a need to plan for a buffer, given the likelihood of some sites (particularly large sites) not delivering or delivering at a slower rate than anticipated. The Proposed Submission Plan 2016 proposed a 14% buffer; however, it is now thought that a smaller buffer is appropriate, given that delivery assumptions for two large sites – Blackwell Farm and Gosden Hill Farm - have been revised down. The NPPF (para 14) is clear that Local Plans should meet objectively assessed needs “with sufficient flexibility to adapt to rapid change”.
- Option 8 is a reasonable higher growth option – any higher growth option would likely lead to unacceptable negative environmental effects. Whilst higher growth options were appraised and consulted on in 2016, these options were not found to perform well. Further, the situation has evolved since 2016, in that sites have dropped out of contention (notably Normandy/Flexford and Liddington Hall), with the result that it is not possible to conceive any potential for a higher growth option that does not involve poorly performing sites, and ultimately lead to unacceptable environmental effects. Furthermore, any higher growth option would involve providing for more than half of Woking’s unmet needs figure, which is arguably unreasonable, as Waverley (the other authority in the HMA) might take a share.

<sup>38</sup> This ‘givens’ figure includes the figures discussed in paras 6.6.4-9, and 6.6.12. It also includes: housing completions and commitments (i.e. planning permissions) since the start of the plan period; an assumption for windfall sites (i.e. sites that gain planning permission despite not being allocated in the plan, on the basis that they are in accordance with plan policy); and an assumption for rural exception sites (i.e. sites that gain planning permission despite not being allocated in the plan, on the basis that they will meet a specific identified housing need attributed to a rural community). Detailed figures, and further explanation, can be seen in Table 6.3.

### The reasonable alternatives

- 6.7.4 To conclude, the spatial strategy alternatives presented in Table 6.2 were determined to be the reasonable alternatives, in early 2017. The reasonable alternatives are presented in detail in **Table 6.3** and the subsequent **maps**.<sup>39</sup>
- 6.7.5 They were determined to be the ‘reasonable’ alternatives following consideration of the total quantum of land that needs to be allocated and distribution givens / variables / options. Equally, they were determined to be reasonable on the basis that their appraisal should enable and facilitate discussion of numerous important issues/opportunities.
- 6.7.6 Whilst it was recognised that there are other options that could potentially feature, there is a need to limit the number of alternatives under consideration, with a view to facilitating engagement. **Box 6.11** considers other (‘unreasonable’) spatial strategy options.

#### *Box 6.11: Unreasonable spatial strategy options*

In order to gain an understanding of the rationale / reasoning behind the eight spatial strategy alternatives defined as ‘the reasonable alternatives’ **there is a need to read the chapter above as a whole**. Taken as a whole, this chapter presents ‘an outline of the reasons for selecting the alternatives dealt with’.

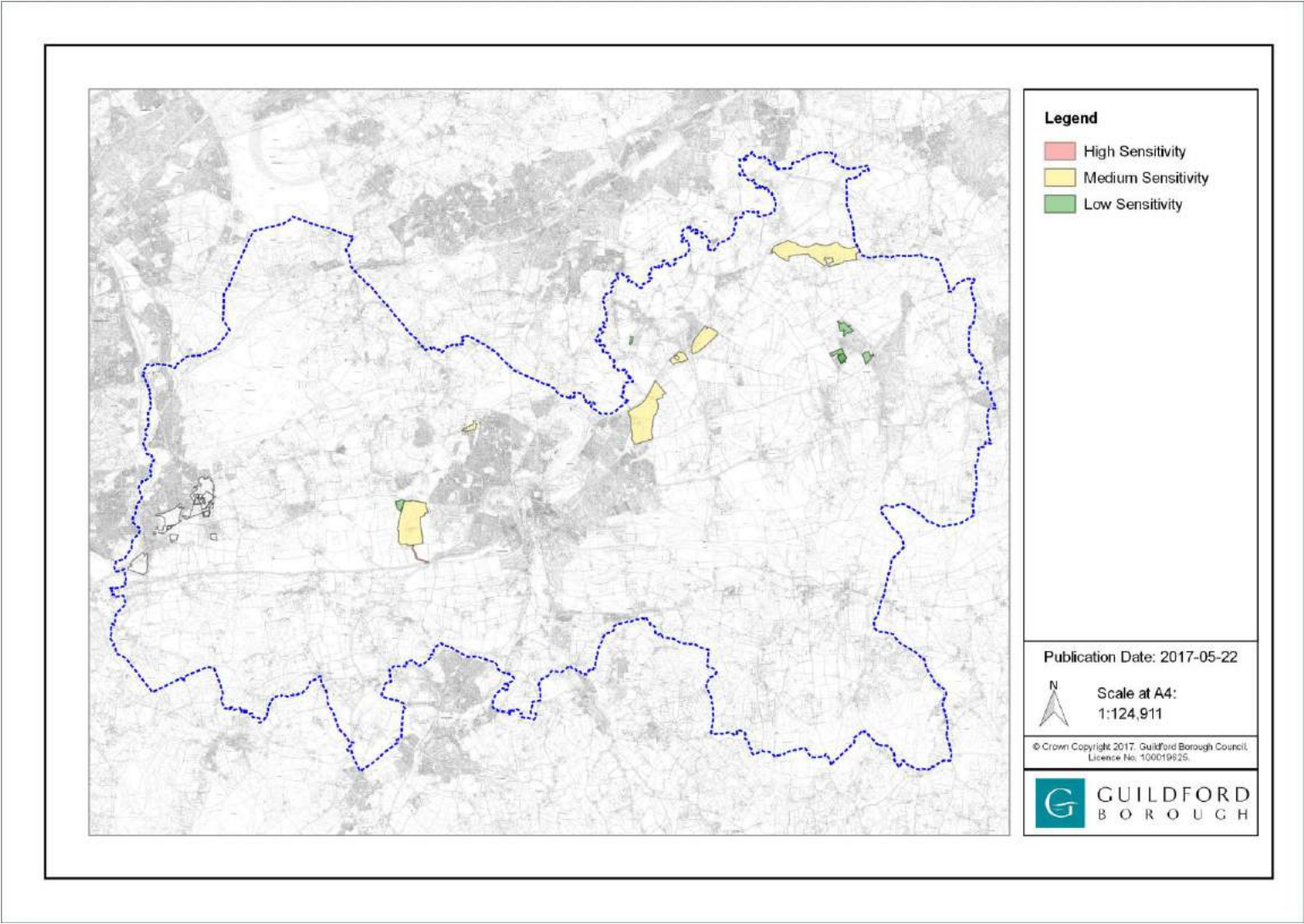
However, it is also worthwhile giving explicit consideration here to some other options considered, but ultimately discounted (as ‘unreasonable’):

- Higher and lower growth options - are unreasonable, as discussed at 6.5 and 6.7.3.
- Options involving an alternative approach to distributing lower growth (e.g. ‘Option 1a’). The discussion in Section 6.6 leads to a single preferred approach to distributing lower growth; however, it is recognised that there are alternatives that could have merit. Interested parties are welcome to suggest their own ‘Option 1a’, informed by the discussion of site options presented in Section 6.6 (and Appendix IV).
- Any option involving no Green Belt release. As discussed in Section 6.6, the approach to growth at non-Green Belt locations, other than the CBGB, is a ‘given’, i.e. there is little or no potential to suggest that higher growth is an option. As for the CBGB, whilst the approach to growth is not a given, the potential for growth here is limited. With this being the case, any option involving no Green Belt release would involve very low growth, and hence can be discounted as unreasonable.
- The 2014 preferred option. It is now understood that it is appropriate to align the plan much more closely with the findings of Green Belt sensitivity analysis, avoid village extensions in the AONB, avoid flood risk and focus to a greater extent on strategic scale schemes that will achieve wider benefits, i.e. deliver strategic infrastructure (schools, transport and community infrastructure). Nonetheless, all sites included within the 2014 plan are still considered ‘reasonable site options’ at the current time (see Appendix IV).
- The 2016 preferred option. A number of sites have dropped out of contention since 2016 for clear planning reasons, as discussed above. Most notably, the strategic site at Normandy/Flexford (1,100 homes) has dropped out of contention, as there is no longer a need to deliver a secondary school here.
- Options involving the implementation of a different ‘phasing’ assumption. For example, the assumption might be that Wisley Airfield will deliver a proportion of homes beyond the plan period, or that Blackwell Farm and Gosden Hill Farm will deliver all homes within the plan period. It would be difficult to meaningfully differentiate the merits of alternatives that vary in respect of phasing assumptions.

<sup>39</sup> N.B. The maps show sites in tiers 7 - 10 only, and show Green Belt sites classified according to Green Belt sensitivity.

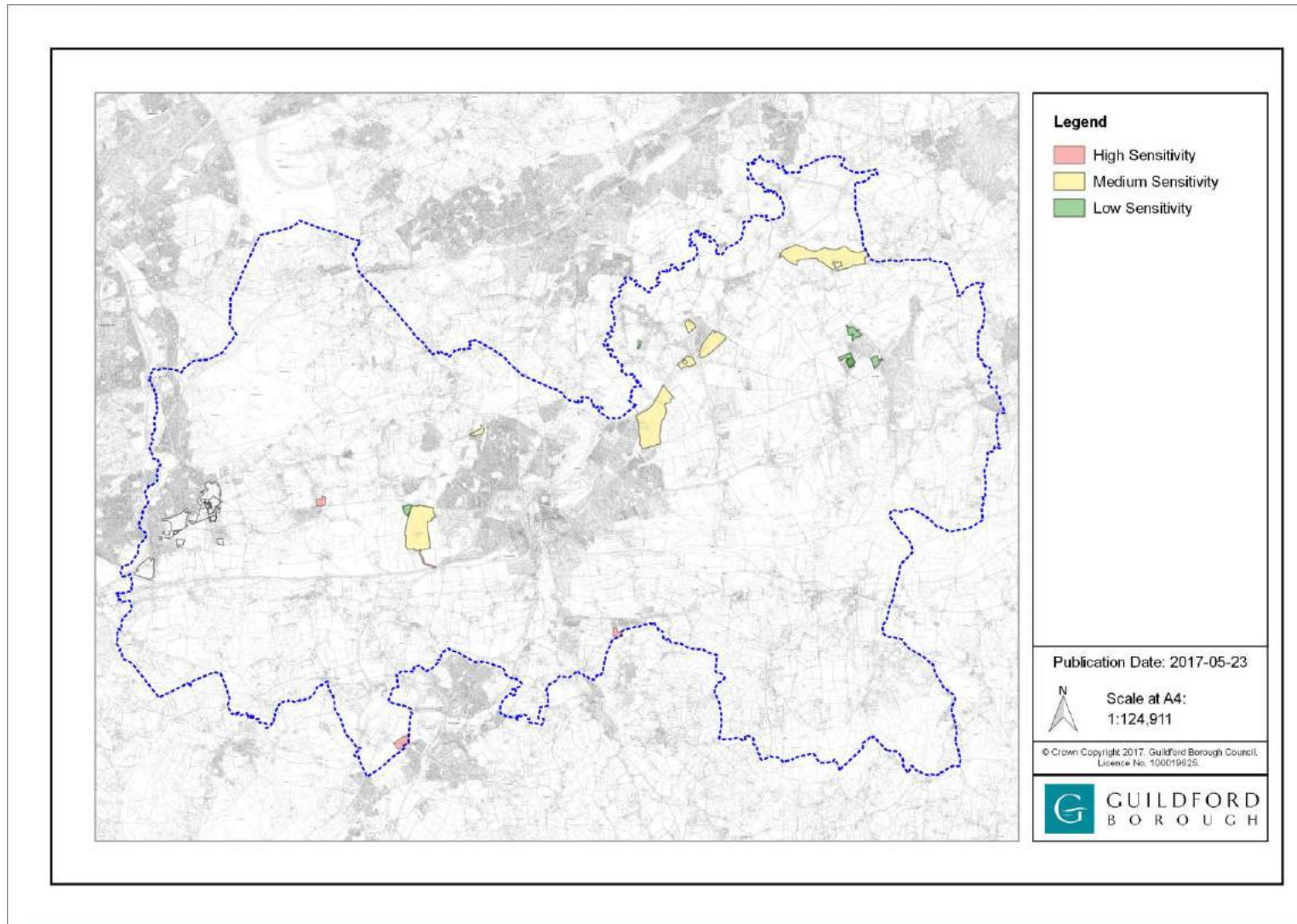
Location within the spatial hierarchy		'Given' or variable?	The reasonable spatial strategy alternatives							
			Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8
Total			13600	14080	14200	14600	14680	15080	15200	15680
% buffer over OAHN			9.4	13.3	14.3	17.5	18.1	21.4	22.3	26.2

Option 1 – OAN + 9.4%

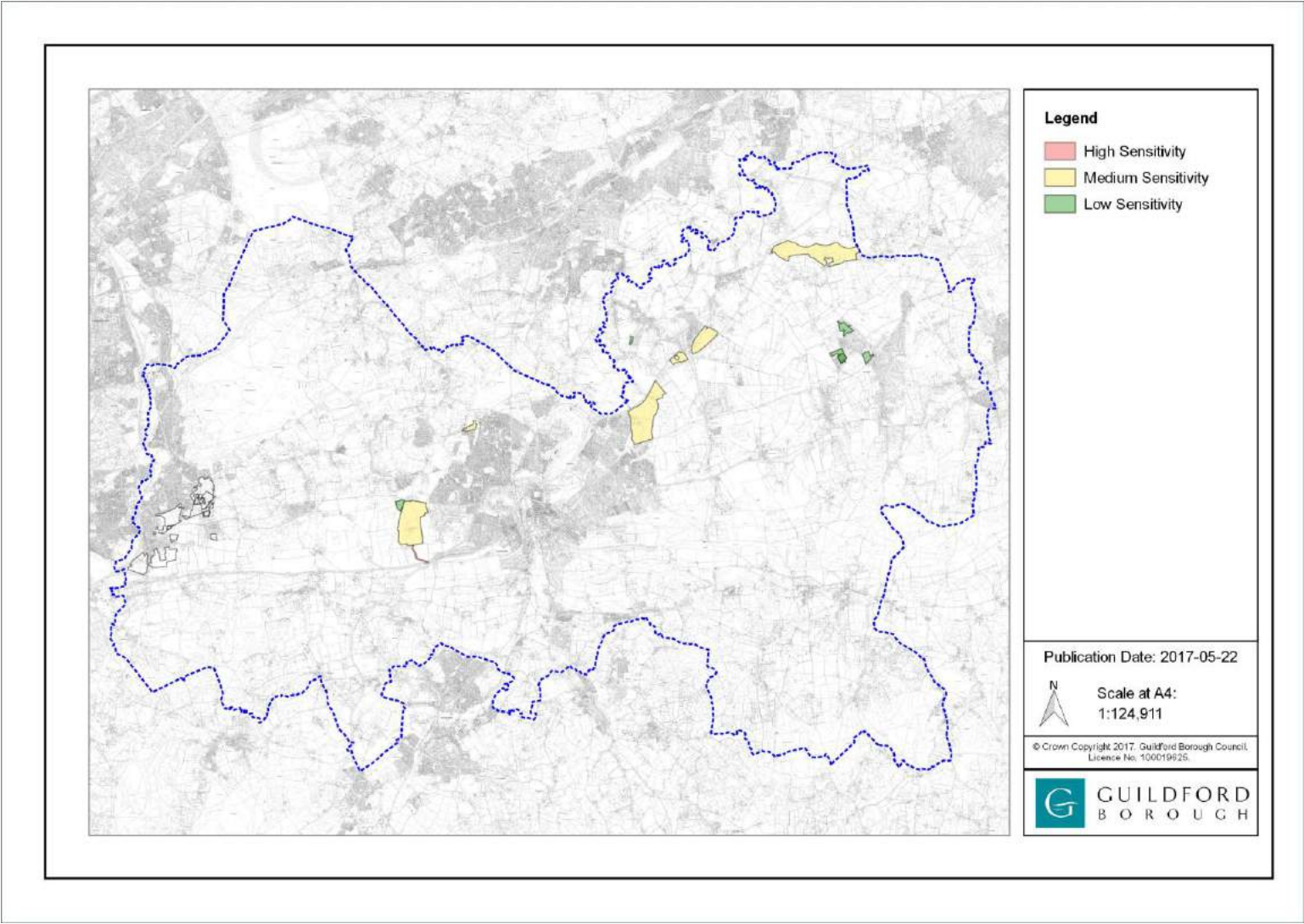




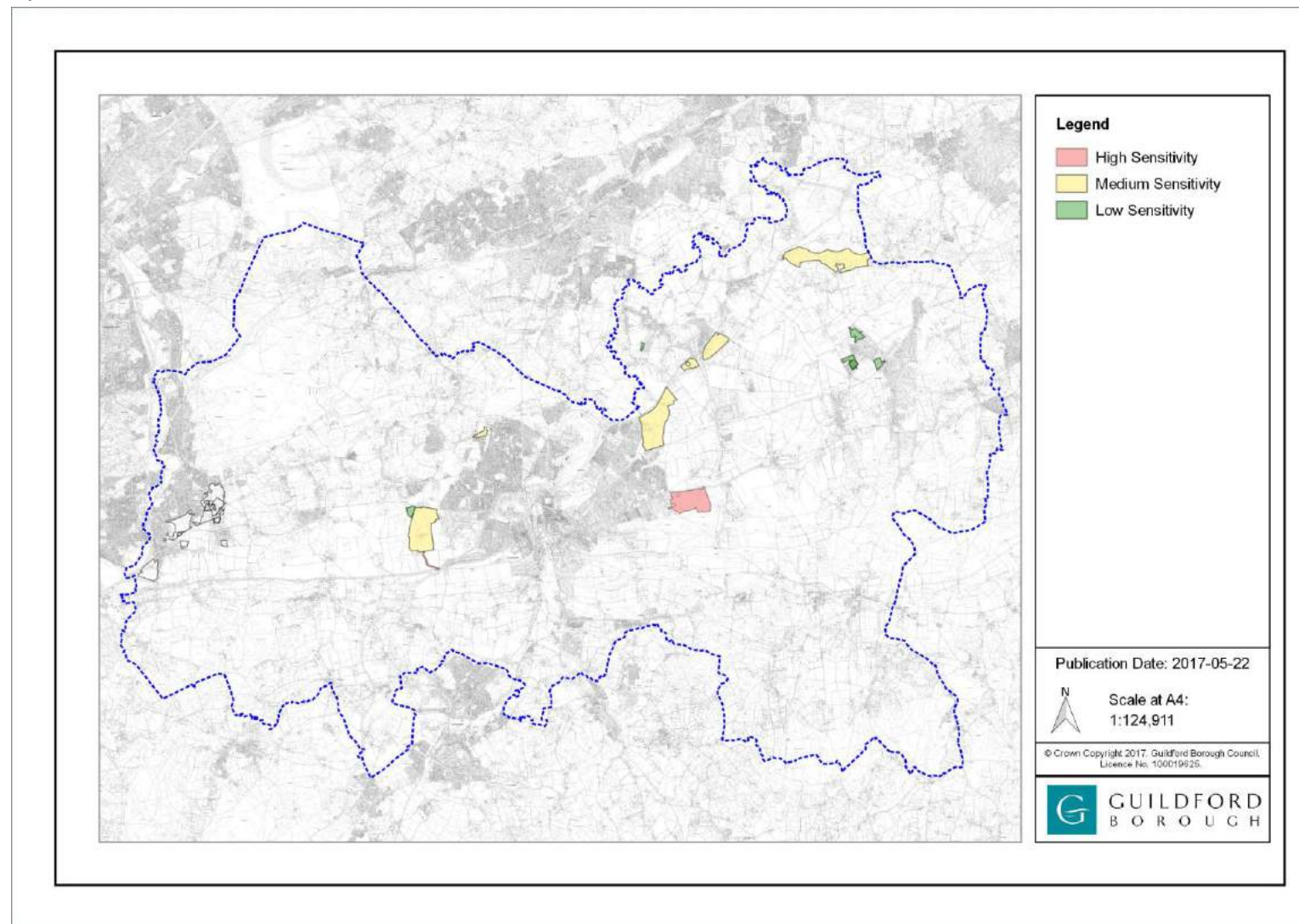
Option 2 - OAN + 13.3%



Option 3 - OAN + 14.3%

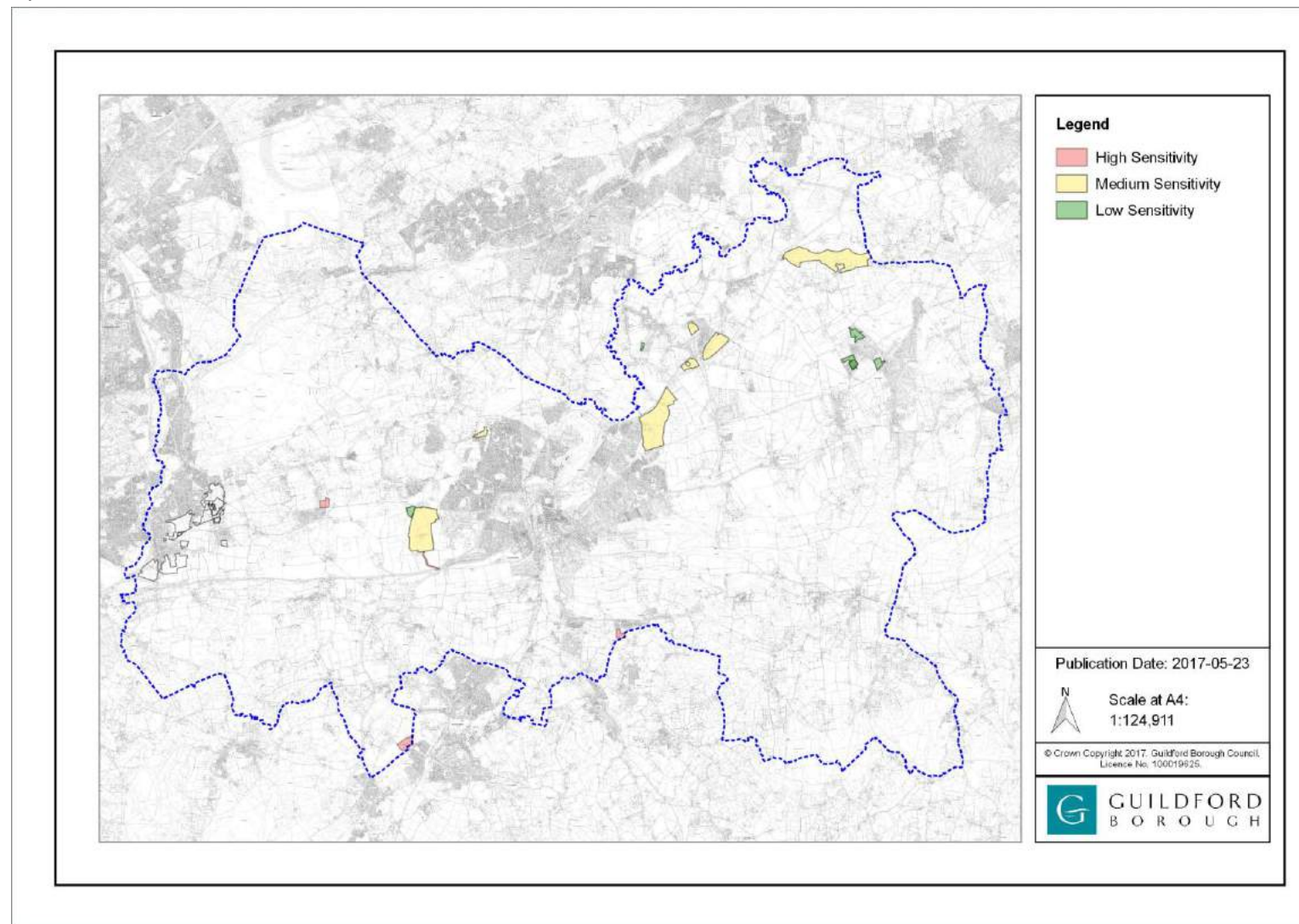


Option 4 - OAN + 17.5%

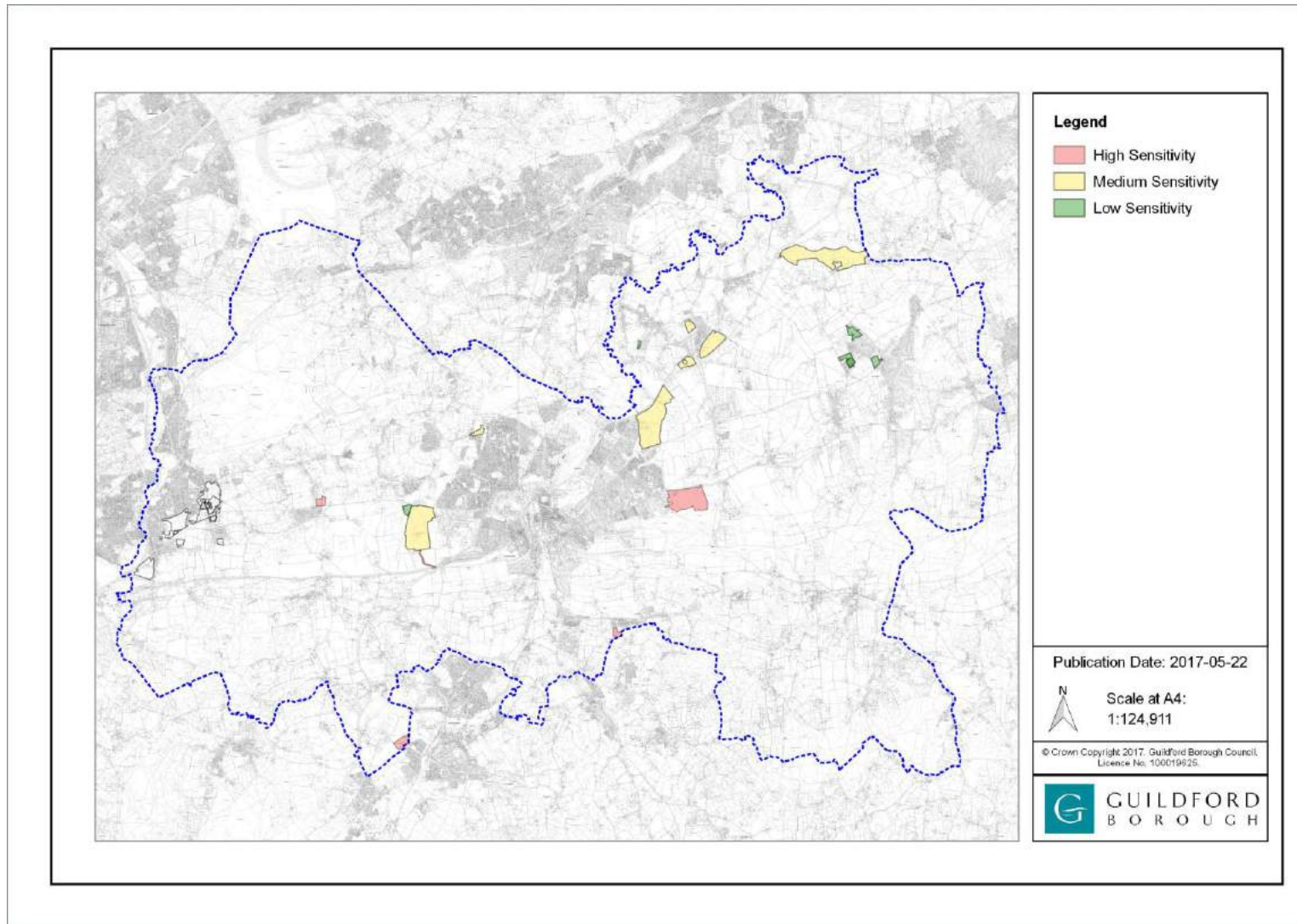




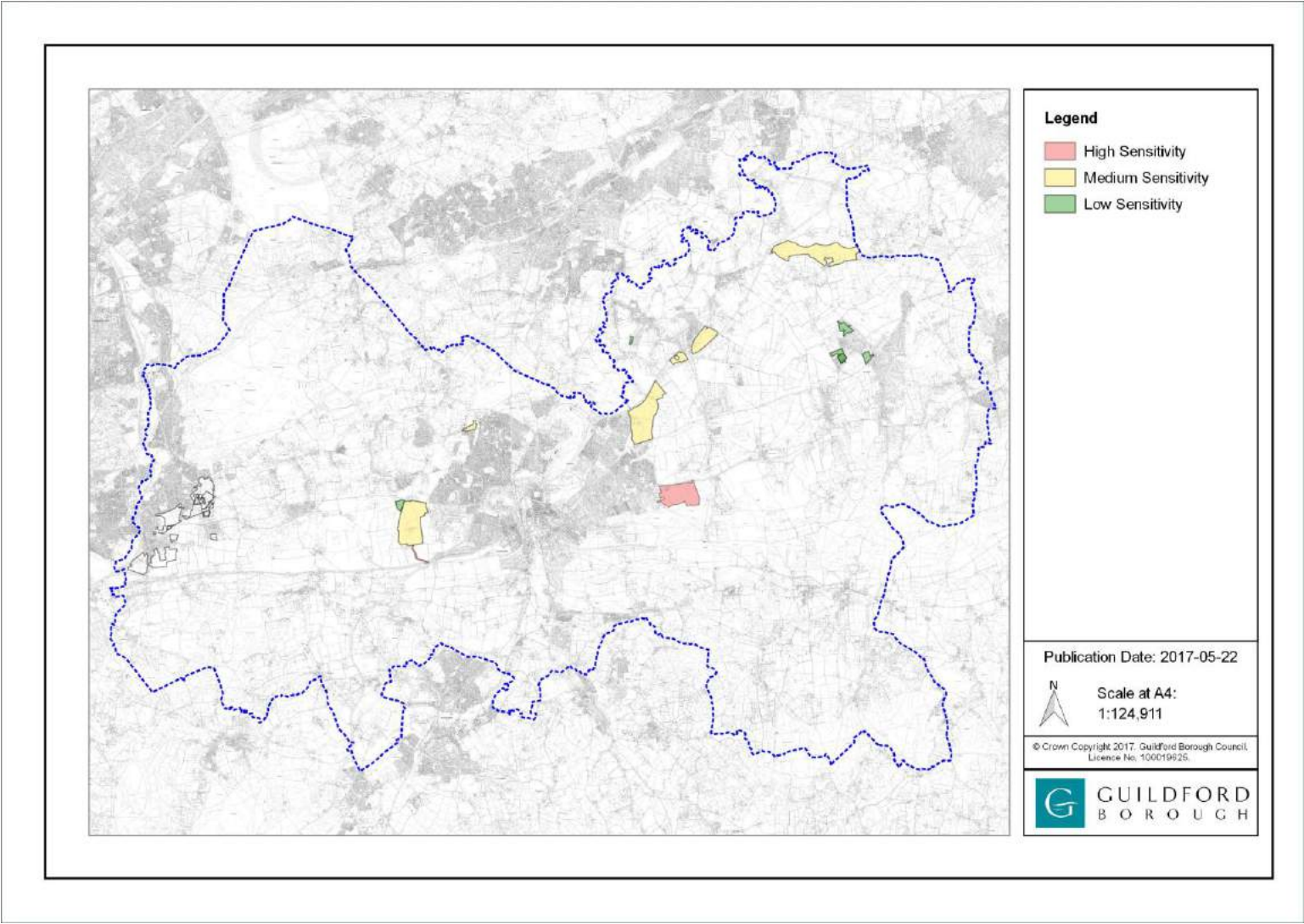
Option 5 - OAN + 18.1%



Option 6 - OAN + ~21.4%

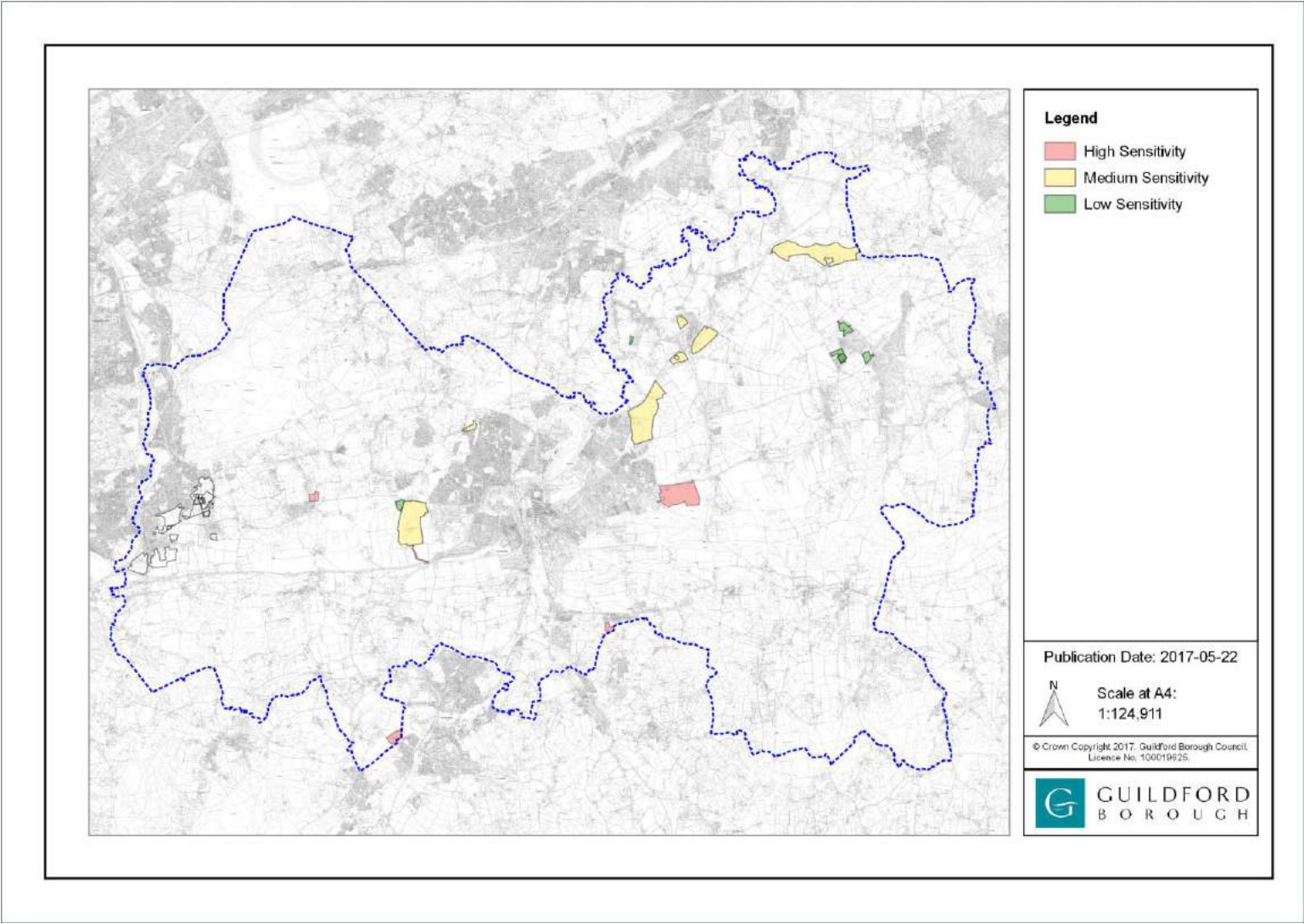


Option 7 - OAN + 22.3%





Option 8 - OAN + 26.2%



## 7 APPRAISING REASONABLE ALTERNATIVES

### 7.1 Introduction

7.1.1 The aim of this chapter is to present summary appraisal findings in relation to the reasonable alternatives introduced above. Detailed appraisal findings are presented in **Appendix V**.

### 7.2 Summary alternatives appraisal findings

7.2.1 **Table 7.1** presents summary appraisal findings in relation to the eight alternatives introduced above. Detailed appraisal methodology is explained in Appendix V, but in summary:

Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects' (using **red** / **amber** / **green**) and also rank the alternatives in order of performance. Also, ' = ' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

Table 7.1: Summary spatial strategy alternatives appraisal findings

Topic	Rank of performance / categorisation of effects							
	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Biodiversity	★1	2	2	3	3	6	6	7
Climate change	4	4	3	2	3	2	★1	★1
Communities	★1	2	2	★1	3	3	3	4
Economy	8	7	6	5	4	3	2	★1
Employment	2	5	5	★1	5	3	3	4
Flooding	★1	2	★1	★1	2	2	★1	2
Health	=	=	=	=	=	=	=	=
Historic environment	★1	2	3	4	4	5	6	7
Housing	8	7	6	5	4	3	2	★1
Land	★1	2	3	4	5	6	7	8
Landscape	★1	2	3	4	5	6	7	8
Poverty	=	=	=	=	=	=	=	=
Brownfield	=	=	=	=	=	=	=	=
Rural	=	=	=	=	=	=	=	=
Safety	=	=	=	=	=	=	=	=
Transport	★1	2	2	2	3	3	3	4
Water	★1	★1	2	★1	2	★1	2	2

Topic	Rank of performance / categorisation of effects							
	Option 1 OAN + 10%	Option 2 OAN + 14%	Option 3 OAN + 15%	Option 4 OAN + 18%	Option 5 OAN + 19%	Option 6 OAN + 22%	Option 7 OAN + 23%	Option 8 OAN + 27%
<p>All options are associated with pros and cons. Option 1 is notable for performing best in terms of a several sustainability topics; however, the appraisal also serves to indicate some draw-backs to this option.</p> <p>Taking notable topics in turn -</p> <ul style="list-style-type: none"> <li>• Biodiversity – It is fair to conclude that lower growth is supported, albeit lower growth could potentially lead to unmet needs that must be met elsewhere within the heavily constrained sub-region.</li> <li>• Climate change – Most higher growth options perform relatively well, as additional housing would be delivered at one or more strategic-scale schemes, where there would be the potential to fund/deliver low carbon infrastructure and/or achieve ambitious standards of energy efficiency.</li> <li>• Communities – Only higher growth options involving an additional extension to Guildford at ‘Clandon Golf’ are supported, as this is a large scheme that would deliver new/upgraded strategic community infrastructure.</li> <li>• Economy - The Strategic Housing Market Assessment (SHMA) is clear that housing under-delivery within the West Surrey Housing Market Area (HMA), which is also a Functional Economic Market Area (FEMA), could result in economic growth opportunities going unrealised; hence options not making a contribution to meeting Woking’s unmet housing need perform less well.</li> <li>• Employment – Only higher growth options involving an additional extension to Guildford at ‘Clandon Golf’ are supported, as this is a large scheme that would deliver new (limited) employment land. Higher housing growth aligned with higher employment growth is to be supported at Guildford, from a pure national/regional economic growth perspective (leaving aside other considerations, e.g. traffic).</li> <li>• Flooding – Some of the sites that would be delivered under certain higher growth options are associated with a minor flood risk constraint. It is likely that risk can be avoided in practice.</li> <li>• Historic environment - the degree of impact generally increases in-line with the quantum of growth, although the correlation is not entirely linear, as there is an instance of an option involving only marginally higher growth with the additional housing at a less constrained site.</li> <li>• Housing - Higher growth options are to be supported given the importance of putting a buffer in place, in order to maximise the likelihood of Guildford delivering on its Objectively Assessed Housing Need (OAHN) figure, and given the likelihood of housing undersupply within the HMA (arising from Woking). High growth options would involve making a contribution to meeting unmet needs within the HMA.</li> <li>• Land - all options would result in significant loss of best and most versatile agricultural land, and hence significant negative effects, although all options would maximise brownfield development.</li> <li>• Landscape – Most sites that come into contention under higher growth options are constrained, and so the degree of impact increases in-line with the quantum of growth supported.</li> <li>• Transport - The degree of impact generally increases in-line with the quantum of growth, although not entirely due to the sites varying in terms of transport constraint / opportunity (in terms of support for modal shift and/or traffic congestion). With regard to effect significance, there is confidence that Option 1 would not lead to significant negative effects, given the findings of the Strategic Highway Assessment Report (2016). Higher growth options have not been subjected to transport modelling, and so there is no certainty regarding the potential for ‘a severe impact on the local and strategic highway network’; however, it is appropriate to ‘flag’ the risk of significant negative effects under Option 8.</li> <li>• Water - A recent Water Quality Assessment has found that the Ash Vale Wastewater Treatment Works (WwTW) in the west of the borough has limited capacity to receive additional wastewater, potentially constraining spatial strategy options 3, 5, 7, 8, which would see additional growth at Ash/Tongham; however, the study concludes that it should be possible to increase the capacity of the WwTW.</li> </ul> <p>The intention is for the Council and stakeholders to take these findings into account when considering how best to ‘trade-off’ between competing objectives, and establish the ‘most sustainable’ option.</p>								

## 8 DEVELOPING THE PREFERRED APPROACH

### 8.1 Introduction

- 8.1.1 The aim of this Chapter is to present the Council's response to the alternatives appraisal / the Council's reasons for developing the preferred approach in-light of alternatives appraisal.

### 8.2 The Council's outline reasons

- 8.2.1 The Council's preferred approach is Option 1, which the appraisal finds to perform relatively well, in that it stands out as performing well in terms of certain objectives (notably 'communities' and 'employment') and does not stand-out as performing poorly in terms of any objective. However, as is inevitably the case, Option 1 does have drawbacks.

- 8.2.2 The following bullet points discuss the justification for the preferred option, relative to the reasonable alternatives (i.e. relative to higher growth options), in terms of certain notable objectives, including those in terms of which the preferred option performs relatively poorly. The following text is provided by the Council -

- **Biodiversity** - The appraisal highlights the Council's preferred option, as a restrained approach to growth, as performing most favourably; however, the appraisal highlights the likelihood of 'significant negative effects' nonetheless. There are risks to biodiversity; however, there is good potential to avoid or mitigate impacts in practice. It is recognised that Wisley Airfield is particularly sensitive; however, detailed work has served to demonstrate that ecological value is concentrated at specific locations within the site, and SPA mitigation has been the focus of detailed work and consultation with Natural England.
- **Climate change** - Whilst the appraisal highlights that higher growth options perform better, on the assumption that there would be greater potential to deliver district heating schemes and so reduce average per capita CO2 emissions from the built environment, this is not an overriding consideration. The plan performs well from a perspective of supporting walking, cycling and public transport, in particular through maximising opportunities in Guildford town centre, supporting a Sustainable Movement Corridor and directing growth to locations with access to a train station (and indeed delivering two new stations), hence there will be the opportunity to reduce average per capita CO2 emissions from transport.
- **Economy** - The appraisal serves to highlight an economic argument for providing for a quantum of housing above that necessary to provide for the SHMA assigned OAHN figure, on the basis that there is a need to provide for housing needs within the HMA, which is also a FEMA. However, the Council believes that a positive strategy for economic growth is set to be put in place, and the Council notes M3 LEP's support for providing housing in-line with the SHMA assigned OAHN figure (as understood from M3 LEPs representation on the 2016 Proposed Submission Plan). Whilst additional housing in Guildford Borough might in theory support realisation of economic growth opportunities within the FEMA, in practice it is not clear that this would be the case, as there could be an imbalance of housing and employment locally, with implications for commuting, and in turn traffic congestion.
- **Employment** - The appraisal suggests that a higher growth option involving Clandon Golf would be preferable, as this site would deliver additional employment land; however, this site performs poorly in certain respects (e.g. landscape). The Council has put in place a balanced strategy for housing and employment growth that seeks to meet needs and also aligns with a strategy for infrastructure upgrades. Housing and employment growth at Clandon Golf would not align with the strategy, notably because it is divorced from the Sustainable Movement Corridor.
- **Land** - The appraisal highlights the Council's preferred option, as a restrained approach to growth, as performing most favourably; however, the appraisal highlights the likelihood of 'significant negative effects' nonetheless. The extent of constraints within the borough, including the AONB to the south and the SPA to the north, means that there is a need to focus development within a central band through the borough, where there is extensive best and most versatile agricultural land.

- Landscape** - The appraisal highlights the preferred option as performing well; nevertheless, it is worthwhile commenting here, given the sensitivities that exist locally. There will be impacts under the preferred option; however, the Council is confident in the ability to mostly ensure landscape impacts that are of no more than very local significance, given proposed policy aimed at guiding masterplanning, layout, design and landscaping. A strategic development at Blackwell Farm poses particular issues, from a landscape perspective, however a number of steps have been taken to minimise conflicts since the time of the 2014 draft plan. Capacity has been reduced from 2,250 to 1,800 homes, and whilst the site still requires an access off the A31, the reduced capacity now enables the use of the existing access road, Down Place. This road, which runs through both AONB and AGLV, and will require upgrading; however, this can be achieved whilst mostly retaining and enhancing the historic tree cover present along its length.
- Housing** - The preferred option performs well as it will put in place a strategy for meeting the borough's OAHN; however, it is recognised that the strategy will likely result in unmet housing needs within the HMA (on the assumption that the Waverley Local Plan will not provide for all unmet needs arising from under-supply in Woking). Higher growth options would perform better, but would be problematic in terms of a range of environmental (and transport) issues/objectives, given local sensitivities. It is far from clear that Guildford is relatively unconstrained / suited for growth above OAN in the sub-regional context.

This is the finding of the SA work, but it is also worth noting that the Council's work to consider safeguarding options has also led to the same conclusion. The Council has looked into safeguarding sites, in addition to allocations, in order to negate the need for a Green Belt review until 'well beyond the plan period' (in-line with Government guidance); however, no opportunities are apparent. Given that Government Guidance advocates safeguarding land 'between the urban area and the Green Belt', which in practice would mean safeguarding sites on the edge of the Guildford urban area, considerations include -

- Major constraints to the north (SPA) and south (AONB) would necessitate safeguarding land to the east and/or west, resulting in an oblong-shaped urban area.
  - There is inevitably a limit to the extent that the urban area can expand before it would begin to merge with surrounding villages.
  - Available land around the urban area is high sensitivity Green Belt.
- Transport** - The appraisal highlights the preferred option as performing well; nevertheless, it is worthwhile commenting here, given the sensitivities that exist locally. There will be impacts under the preferred option; however, the Council is confident in the ability to avoid severe impacts, given the findings of the transport modelling work completed in 2016. Whilst the modelling work has not been updated to reflect the 2017 preferred option, it has been subject to a high-level review, and the lower growth strategy should ensure that the conclusions of the 2016 modelling work still stand. Furthermore, plans for infrastructure delivery have been reviewed, revised and where necessary strengthened since 2016, notably through revised wording within Policy ID1 (Infrastructure and delivery), and Appendix C of the Infrastructure Schedule contains the updated key infrastructure requirements. For example, scheme LRN25, which relates to the Waverley Borough Council draft Local Plan site allocation at Dunsfold Aerodrome, has been added.

It is considered that the higher growth strategy for the Send area can be managed through the planned schemes in the Plan and future development management processes. It is noted that modelling work in 2016 led to the conclusion: *"There are several instances of roads showing unexpected increases... The increase on Polesden Lane at Send Marsh appears to be due to the traffic calming measures put in place to complement the new A3 slips at Burntcommon. Given that stretches of it are narrow and only allow vehicles to pass in a single direction at one time, it is unlikely that such increases will materialise. But it may be that this road will need to be monitored if the slips are implemented and traffic calming introduced if required."*

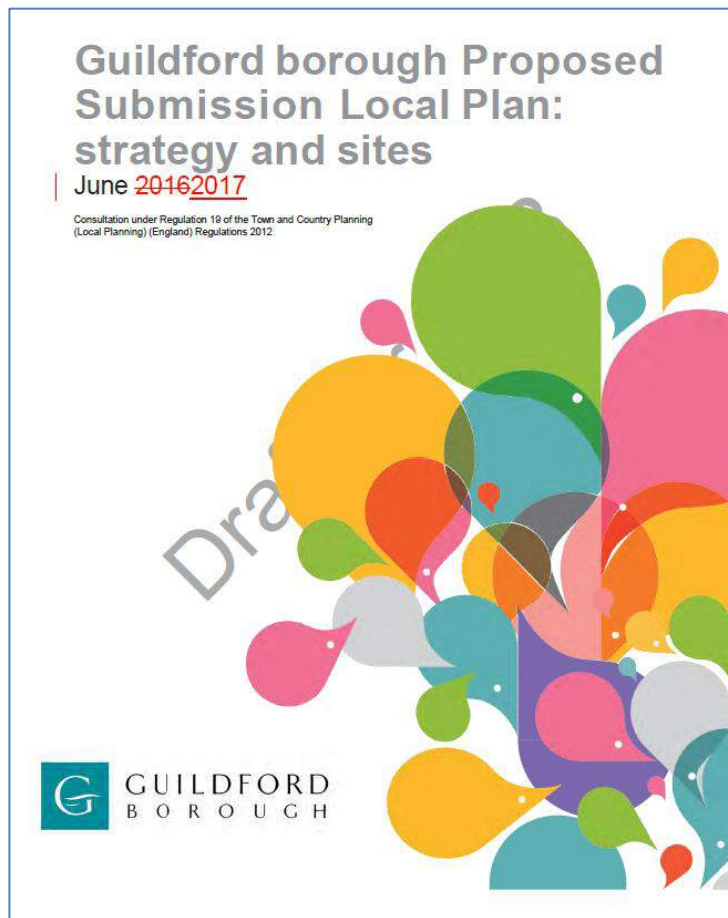


## **PART 2: WHAT ARE SA FINDINGS AT THIS CURRENT STAGE?**

## 9 INTRODUCTION (TO PART 2)

- 9.1.1 The aim of this part of the report is to present an appraisal of both:
- 1) the Proposed Submission Plan, as it stands at the current time
    - i.e. the Proposed Submission Plan 2016 plus Targeted Changes.
  - 2) Targeted Changes in isolation.
- 9.1.2 By way of introduction, this chapter introduces the Proposed Submission Plan / Targeted Changes, and discusses appraisal methodology.

*Figure 9.1: Front cover of the document*



## 9.2 The Proposed Submission Plan / Targeted Changes

### The Proposed Submission Plan

- 9.2.1 Plan objectives have already have already been discussed, in Chapter 3 above. Presented here is a summary of the Council's proposed policy approach to addressing the objectives, in the form of the proposed plan vision (**Box 9.1**) and key diagram (**Figure 9.2**).

### Targeted Changes

- 9.2.2 The vision is presented with 'tracked changes' to show how it has been adjusted since 2016. Essentially, the tracked changes show the following changes:

- The OAHN figure to be provided for through the plan has decreased to 12,426, or 654 dpa over the 19 year plan period. This is precisely the OAHN figure. In 2016 the intention was to provide for 13,860, or 693 dpa over a 20 year plan period. Again, the intention was to provide for the OAHN figure. The change in strategy reflects a **5.6% decrease in OAHN**.  
 – N.B. The plan allocates land to deliver 13,600, as the reliance on large sites within the strategy necessitates a **9.4% buffer**. Without a buffer there would be a risk that large sites will be delayed, leading to the OAHN figure not being achieved. The proposed buffer is less than in 2016 (14%), as there is less reliance on large sites (i.e. homes at large sites comprise a lower proportion of the total to be delivered in the plan period).
- At the Blackwell Farm and Gosden Hill Farm proposed **strategic urban extensions**, the assumption is now that both will deliver some housing beyond 2034, i.e. the assumption is now no longer that both will be built-out during the plan period.
- The 1,100 home scheme at **Normandy / Flexford** has been removed from the plan.

- 9.2.3 **Other proposed changes** to the housing strategy are as follows –

- Guildford town centre – increase the number of homes at North Street redevelopment strategic site, remove one unavailable site (Telephone exchange) and adjust three other sites; with a net increase of 250 homes.
- Guildford urban area – one site will now be delivered as student accommodation, rather than housing. At two other sites the proposal is to adjust the number of homes.
- Ash and Tongham CBGB – the proposal for this area is unchanged; however, the proposal is now to allocate sites with planning permission that are not yet under construction, in order to give a more transparent picture of the growth expected in the area.
- Previously developed land in the Green Belt – The proposal is now to retain Broadford Business Park, Shalford, in employment use, rather than allocate for 100 homes.
- Within villages – The proposal is now to retain the Hotel site, East Horsley, as a hotel use, rather than allocate for 48 homes.
- Within proposed village boundaries – the capacity of one site (Send) is adjusted upwards.
- Village Green Belt – other than the large site at Normandy/Flexford (discussed above), the proposal is also to remove two other sites (Flexford and West Horsley).

- 9.2.4 With regards to **employment land**, the proposal is now to provide for -

- ~39,900m<sup>2</sup> of new (net increase) office and research and development floorspace (B1a/b), a decrease of 5.5% on the 2016 figure; and
- ~3.9 ha of industrial (B1c, B2 and B8), decrease of 22% on the 2016 figure.

- 9.2.5 The decrease reflects the latest Employment Land Needs Assessment (AECOM, 2017), which accounts for a post-Brexit decrease in demand forecasts.

- 9.2.6 With regards to employment land distribution, the two points to note are: A) the proposal to shift development of a new 7,000m<sup>2</sup> Strategic Employment Site from ‘Garlick’s Arch, Send Marsh’ (where the proposal in 2016 was to deliver a mixed use development) to ‘Land around Burnt Common warehouse, London Road, Send’ (where the proposal is to deliver a stand-alone employment site). Also, as discussed above, the proposal is now to retain Broadford Business Park, which is a large Locally Significant Employment Site.
- 9.2.7 Finally, with regards to **Traveller Accommodation**, the proposal is to allocate pitches (for Gypsies and Travellers) and permanent plots (for Travelling Showpeople) in order to meet the needs established by the Traveller Accommodation Assessment (TAA, 2017). In 2016 an equivalent up-to-date study was not available, leading to a need to estimate the number of pitches and plots to be provided for in the latter part of the plan period.
- 9.2.8 The need for Gypsy and traveller pitches has decreased significantly from 73 pitches to 53 pitches; however, this is only because the most recent study uses a more recent base date, prior to which there were a number of planning permissions.
- 9.2.9 Only one allocation has been removed from the plan, and that is due to the site now being under construction; and it is not proposed to adjust the number of pitches/plots to be provided at any site. The only change is a ‘straight-swap’ between provision of Travelling Showpeople Plots at Normandy/Flexford to provision at Garlick’s Arch, Send Marsh.
- 9.2.10 **Table 9.1** summarises the change in growth requirements between the two regulation 19 iterations of the plan.

Table 9.1: Summary of key changes to evidence and resulting Targeted Changes

Element of need	Need as understood for the purposes of the 2016 Plan (2013 33)	Need as understood for the purposes of Targeted Changes (2015 34)	Was / is the proposal to meet needs in full?
Housing	13,860 homes	12,426 homes	Yes
Office and research and development floorspace	37,200 – 47,200 m <sup>2</sup>	36,100 – 43,700 m <sup>2</sup>	
Industrial employment land	4.7 – 5.3 ha	3.7 – 4.1 ha	
Gypsies and travellers	73 pitches	53 pitches	
Travelling Showpeople	8 plots	8 plots	

### Box 9.1: The Proposed Submission Plan 2017 Spatial Vision (abridged)

The Local Plan: strategy and sites makes provision to meet the identified growth needs of the borough in terms of housing, employment and retail and leisure. This is achieved by maintaining the extent and function of the Green Belt in such a way as to protect the existing character of the borough through maintaining the clear distinction between urban and rural areas and safeguarding the natural, built and historic environment. All new development will be of exemplary design and bring with it the necessary infrastructure and services required to enable future and existing communities to live sustainable lives.

In meeting this target a range of house sizes will be provided reflecting our communities needs and helping to create mixed communities. Affordable housing will account for approximately 40% of all new housing and be provided on all appropriate sites.

The plan provides for the delivery of **at least** ~~13,860~~ **12,426** additional homes by ~~2033~~ **2034**... Approximately 3,000 units will be located in the urban areas which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car. The plan also makes provision for approximately 1,200 dwellings within and as extensions to existing villages, some of which are now inset from the Green Belt...

The plan... focuses some development on large strategic greenfield sites which brings with it significant infrastructure, helps to make it sustainable and does not compromise the overall character of the borough. ~~Just under~~ **At least** ~~4000~~ **3,200** units will be provided **within the plan period** on two urban extensions; one to the north east of the Guildford urban area at Gosden Hill Farm and the other to the south west of Guildford at Blackwell Farm. A new settlement will be created at Wisley containing ~~over~~ **approximately** 2,000 homes ~~and a significant expansion is planned at Normandy and Flexford to provide over 1000 new homes.~~

Further development is also directed in and around Ash and Tongham on land beyond the Green Belt along with new Green Belt designated to prevent Ash and Tongham merging with the village of Ash Green.

The delivery of this quantum of residential development will lead to the provision of a significant increase in accessible public open space across the borough. Over ~~250ha~~ **240ha**, equivalent to more than ~~350~~ **330** football pitches, will be provided in perpetuity for the use of residents and visitors. This space will also support and improve the borough's biodiversity...

Existing high levels of economic prosperity will be maintained and enhanced through the protection of commercial premises and the provision of additional sites and premises to meet the needs of businesses across the borough. A hierarchy of strategic employment sites will help protect existing floorspace and ensure any loss is fully justified. The primary new site allocated is an extension to the Surrey Research Park. Approximately 11 ha, comprising 35,000m<sup>2</sup> of premises for business use (including offices, research, development and design activities in any science) will be provided within the plan period...

The role of Guildford town centre as the largest retail, service, administrative and commercial centre in Surrey will be maintained and enhanced. The major town centre redevelopment of North Street will include ~~45,000m<sup>2</sup>~~ **41,000m<sup>2</sup>** of comparison retail floorspace together with ~~3,000m<sup>2</sup>~~ **6,000m<sup>2</sup>** of food and drink uses and up to ~~200~~ **400** flats...

The transport strategy and Local Plan policies will be aligned to encourage residents, employees and visitors to use alternative modes of transport and to seek to reduce car traffic especially through the town.

... The growth allocated in this plan is predicated on the delivery of the necessary infrastructure. The Infrastructure Schedule accompanying the plan outlines the key infrastructure needed to support the development planned, focusing particularly on the first five years of the plan period and the strategic development sites.

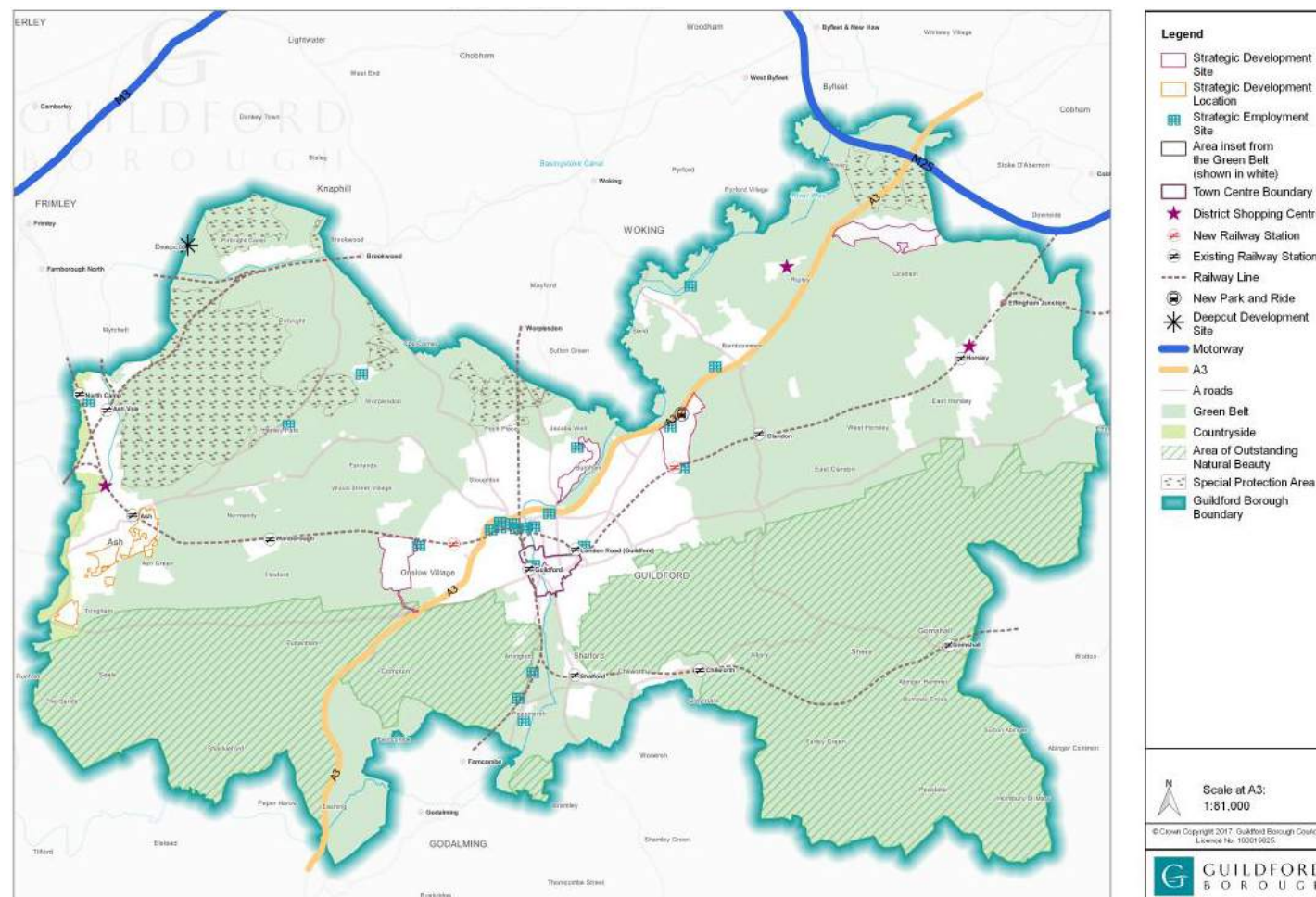
During the plan period Guildford will experience significant improvements in transport infrastructure including new rail stations at Guildford West (Park Barn) and Guildford East (Marrow), over twenty schemes to address 'hotspots' on the Local Road Network and a new park and ride site at Gosden Hill Farm.

A Sustainable Movement Corridor, providing a priority route for buses, pedestrians and cyclists through the Guildford Urban area and serving new communities at Blackwell Farm, Gosden Hill Farm and Slyfield Area Regeneration Project, will be delivered.

The Department for Transport's Road Investment Strategy includes schemes for the A3 Guildford and the M25 Junction 10/A3 Wisley interchange. Early, targeted improvement schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered within the plan period. The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3...



Figure 9.2: The Proposed Submission Plan 2017 Key Diagram<sup>40</sup>



<sup>40</sup> N.B. The diagram show *strategic* allocations only. In addition, the plan proposes a series of non-strategic allocations. Proposed non-strategic allocations are included *within* the white GB inset 'areas'.



### 9.3 Methodology

9.3.1 The appraisal identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 4.1) as a methodological framework. In total, there are 17 objectives relating to:

- |  |                                |                                     |
|--|--------------------------------|-------------------------------------|
| • Biodiversity                         | • Health                       | • Previously developed land         |
| • Climate change                       | • Historic environment         | • Rural economy                     |
| • Communities                          | • Housing                      | • Safety and security               |
| • Economy and employment <sup>41</sup> | • Land Landscape               | • Transport                         |
| • Flooding                             | • Poverty and social exclusion | • Waste                             |
|  |                                | • Water quality and water resources |

9.3.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness/ accessibility to the non-specialist). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

9.3.3 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.<sup>42</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

#### Structure of the appraisal

9.3.4 The appraisal is structured as follows –

- Each section deals with one of the 17 SA topic headings
- Each section comprises two sub-sections – one dealing with the Proposed Submission Plan, as it stands at the current time; and the other dealing with Targeted Changes.
- The first sub-section is split under three further headings –
  - Commentary on the spatial strategy (i.e. Policy S2)
  - Commentary on other ('Core' and 'Development Management') policies
  - Appraisal of the Proposed Submission Plan 2017.

9.3.5 As such, the appraisal presented below comprises a series of 68 narratives.

9.3.6 It is worth being clear that, within these narratives, specific policies and specific Targeted Changes are referred to only as necessary, i.e. it is not the case that systematic consideration is given to the merits of every plan policy and/or every Targeted Change, in terms of every sustainability topic/objective/issue. This approach is in accordance with the regulatory requirement, which is simply to present an appraisal of 'the plan'.

<sup>41</sup> The decision was taken to consider 'economy' and 'employment' jointly, for the purposes of the draft plan appraisal.

<sup>42</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## 10 APPRAISAL OF THE PROPOSED SUBMISSION PLAN AND TARGETED CHANGES

### 10.1 Introduction

- 10.1.1 As introduced above, the aim of this chapter is to present an appraisal of 1) the Proposed Submission Plan, as it stands at the current time, i.e. the Proposed Submission Plan 2016 plus Targeted Changes; and 2) Targeted Changes in isolation.

### 10.2 Biodiversity

#### The Proposed Submission Plan 2017

##### *Commentary on the spatial strategy*

- 10.2.1 A primary consideration is the need to avoid the risk of impacts to the internationally important Thames Basin Heaths Special Protection Area (SPA); however, there is also a need to consider impacts to areas designated as being of national importance (Sites of Special Scientific Interest, SSSIs) and local importance (Sites of Nature Conservation Importance, SNCIs). Furthermore, there is a need to consider the potential for impacts to non-designated habitats that contribute to ecological connectivity at the landscape scale, and more generally 'green infrastructure' locally. With regards to non-designated habitat, evidence-base is limited; however, the location of broad Biodiversity Opportunity Areas (BOAs) is known.
- 10.2.2 The plan provides for objectively assessed housing needs (**OAHN**) **plus a buffer**, which is a higher level of development than experienced in Guildford borough during the previous Local Plan period. This growth strategy creates tensions with biodiversity objectives as Guildford is a sensitive location in the national context; however, it is difficult to conclude that the broad strategy performs poorly. This is on the basis that any unmet needs arising from Guildford would have to be met elsewhere locally (within the sub-region), and other areas are also heavily constrained. Furthermore, it is not possible to draw conclusions without giving consideration to the spatial approach to accommodating growth.
- 10.2.3 Of the 10,600 homes to be delivered at sites allocated through the plan (plus small sites supported through the LAA), 3,000 (28%) are proposed in within built up area boundaries (2,800 homes), or at previously developed sites in the Green Belt (200 homes). This approach to **greenfield loss avoidance** is supported, from a biodiversity perspective, albeit it is recognised that urban / previously developed sites can be associated with sensitivities. Notably, the Guildford urban area is sensitive given the River Wey corridor).
- 10.2.4 The proposed strategic site at **Wisley Airfield** (2,000 homes) is constrained from a biodiversity perspective – given that parts are adjacent to the SPA and also that the majority<sup>43</sup> is classified as an SNCI - however, there are mitigating factors. There is a commitment to use the northern part of the site (i.e. that part that falls within the 400m SPA buffer) for Suitable Alternative Natural Greenspace (SANG), in order to minimise recreational impacts to the SPA. Also, there is a view that quality of habitat varies significantly within the SNCI, and that built development can avoid the most sensitive parts. Proposed site specific policy requires: "Green corridors and linkages to habitats outside of the site, and the adjoining SANG".
- 10.2.5 It is also noted that there have been evolutions to the site extent and housing yield figure, which help to reduce biodiversity concerns. Specifically, the site area was increased subsequent to the 2014 Draft Plan, and again subsequent to the 2016 Proposed Submission Plan, whilst the yield of the site was not increased. Also, the decision was taken, subsequent to the 2016 Proposed Submission Plan, to allocate the 100 homes for the elderly as C2 (residential institution) rather than C3 (housing). This was again with a view to reducing pressure on the SANG and in turn the SPA.

<sup>43</sup> The northern part of the site is an SNCI. The southern part of the site, which is not an SNCI, is that part of the site that has been added since the time of the 2014 consultation.

- 10.2.6 Other **site-specific issues** include the following: Blackwell Farm sits within the Wanborough and Normandy Woods and Meadows (WNWM) BOA and borders Broadstreet Common SNCI; Gosden Hill Farm sits within the Clandon to Bookham Parkland BOA and borders two SNCIs (Merrow Lane Woodland; and Cotts Wood); Keens Lane partially intersects the 400m SPA buffer; sites at the Horsleys sit within the Clandon to Bookham Parkland BOA and one borders the Lollesworth Wood SNCI; the two sites at Ash Green are within the WNWM BOA, border ancient woodland and in one case borders the Ash Green Wood SNCI; and the Garlicks Arch site at Send Marsh / Burnt Common includes two small patches of ancient woodland, and also a stream that forms part of the River Wey BOA.
- 10.2.7 A range of **site-specific mitigation** measures are proposed, although it is noted that there is potential for more detail in a number of instances. It is **recommended** that detail is added to the policy for Wisley Airfield, to ensure that impacts to the SNCI are minimised.
- Commentary on other policies*
- 10.2.8 Policy ID4 (Green and blue infrastructure) appropriately seeks to target efforts within identified Biodiversity Opportunity Areas (BOAs, which are areas with a concentration of recognised sites of conservation importance), with the policy requiring net gains in biodiversity in the context of the BOA, and its objectives. The policy also deals with open space provision, with supporting text stating that: “Proposals for open space should have regard to the BOA approach...” From a biodiversity perspective, this approach is to be strongly supported.
- 10.2.9 Policy P5 (Thames Basin Heaths Special Protection Areas) sets out an approach to the protection of the SPA in-line with the sub-regionally agreed Thames Basin Heaths SPA Delivery Framework. Central to the strategy is a 400m ‘exclusion zone’ and a 5km ‘zone of influence’ within which mitigation measures (SAMM and SANG) will be required. The supporting text explains that ‘the precautionary principle’ has been adopted by the Council, given that the SPA: “makes an important contribution to... landscape character, provides highly valued habitats, and receives strong protection under UK and European law.”
- 10.2.10 Other policies with minor positive implications for biodiversity include:
- Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value
  - Policy P3: Countryside - recognising that the countryside around Ash and Tongham provides a green corridor considerable biodiversity and recreation value;
  - Policy D1: Place shaping;
  - Policy D4: Character and design of new development; and
  - Policy ID1: Infrastructure and delivery.
- 10.2.11 There is an argument to suggest that some other policies - notably E1 (Meeting employment needs), E6 (The leisure and visitor experience), E7 (Guildford town centre) and ID1 (Infrastructure and delivery) - conflict with biodiversity objectives; however, on close inspection there seems little reason to suggest that policy wording unduly creates conflict. The plan will be read as a whole.
- Appraisal of the Proposed Submission Plan 2017 as a whole*
- 10.2.12 The proposed spatial strategy gives rise to concerns. A lower growth strategy is not necessarily suggested, recognising that other areas in the sub-region are also constrained, but an alternative distribution strategy could possibly be foreseen whereby there is less impact on locally important sites (SNCIs), and also less risk to the SPA (albeit it is recognised that HRA has established no likelihood of significant adverse effects).

- 10.2.13 A range of important policy measures are proposed, and it is apparent that a robust strategy is set to be implemented in respect of SANG delivery (i.e. there can be confidence in the quantity of SANG provision, as well as the quality and maintenance of that over time). Policy for specific sites has responded to biodiversity constraints; however, there is the potential to add further detail to policy requirements (and a recommendation is made to this effect, particularly in relation to the proposed strategic allocation at Wisley Airfield).
- 10.2.14 On balance, taking account of the proposed spatial strategy alongside avoidance and mitigation measures, **significant negative effects are not predicted**. It is noted that Natural England was content with the proposed strategy from 2016 (although Surrey Wildlife Trust and other parties did raise concerns), and the proposed targeted changes are not likely to change this position (see discussion below).

#### Targeted changes

- 10.2.15 The proposal to increase the quantum of growth within Guildford town centre is supported, as is the proposal to delete the following three greenfield allocations from the 2016 plan: A41 (Land to the south of West Horsley), A46 (Land to the south of Normandy and north of Flexford) and A47 (Land to east of The Paddocks, Flexford). All three of these sites are constrained, in particular the latter site, which comprises an SNCI.
- N.B. the 2016 SA Report recommended that the policy requirement for A47 should be strengthened in order to minimise the biodiversity impact.
- 10.2.16 A58 (Land around Burnt Common warehouse, London Road, Send) is a new proposed allocation for employment floorspace on greenfield land. The site is not subject to any strategic biodiversity constraint.
- 10.2.17 Finally, the proposal to remove brownfield allocations is noted: A4 (Telephone Exchange, Leapale Road, Guildford), A34 (Broadford Business Park, Shalford) and A36 (Hotel, Guildford Road, East Horsley). This is potentially non-ideal, from a biodiversity perspective; however, these changes are made for clear-cut planning reasons. The former site is no longer available, and the latter two sites represent an efficient use of land in their current use.

### 10.3 Climate change

#### The Proposed Submission Plan 2017

##### *Commentary on the spatial strategy*

- 10.3.1 Car travel is a key issue in that it has a major bearing on per capita CO<sub>2</sub> emissions; however, this matter is best considered below under 'Transport'. It is therefore appropriate to focus here on matters relating to per capita CO<sub>2</sub> emissions from the built environment.

- 10.3.2 The potential for new development to incorporate low carbon / renewable energy infrastructure (district heating, in the Guildford context),<sup>44</sup> and achieve high standards of sustainable design/construction, is linked to a number of factors, which enables differentiation of the spatial strategy alternatives. Specifically, the scale, mix and density of a scheme has a bearing, and the potential to deliver district heating is also enhanced where a scheme is located close to a source of heat. The Council has established<sup>45</sup> that district heating options should be explored at: residential only developments of at least 50 dph and/or 300 dwellings; (b) residential only developments of 35 dph or above located near a source of heat (or an existing district heating scheme that can be tapped into); and (c) mixed developments of 50 dwellings or more that include either two or more non-residential uses or a single use that would generate waste heat.
- 10.3.3 In light of these points, the preferred **spatial strategy** can be seen to perform well given that -
- Development within Guildford town centre (in particular North Street Redevelopment) and the Guildford urban area (in particular Slyfield Regeneration Project) will capitalise on particular opportunities established by the Guildford Renewable Energy Mapping Study. Specifically, the study identified five 'heat priority areas' focused on Central Guildford, the Royal Surrey County Hospital and University of Surrey's Stag Hill Campus and adjacent industrial estates.
  - The scale of development at the two major urban extensions to Guildford – Blackwell Farm and Gosden Hill Farm – and at Wisley Airfield gives rise to considerable opportunity (to achieve high standards of sustainable design and construction, and deliver a high quality district heating scheme), albeit there is uncertainty given competing funding priorities (e.g. SPA and avoidance and mitigation measures). The Blackwell Farm site is located close to a heat priority area; however, this is unlikely to result in particular opportunity.
  - Similarly, the scale of development at the Garlicks Arch scheme gives rise to opportunity.
- 10.3.4 **Site-specific policy** does not identify instances of particular opportunity that should be capitalised upon; however, this is likely to be appropriate given overarching, district-wide policy (see discussion below).
- Commentary on other policies*
- 10.3.5 Policy D2 (Sustainable design, construction and energy) supports the development of low and zero carbon and decentralised energy. Most notably, the policy specifies that proposals for development within heat priority areas, and all sufficiently large or intensive developments (as defined by the supporting text), must demonstrate that heating and cooling technologies have been selected in accordance with a heating and cooling hierarchy (as defined in policy) unless it can be clearly demonstrated that an alternative approach would be more sustainable. Also, the policy states that a statement submitted as part of development proposals must demonstrate: "the lowest level of carbon emissions (direct and embodied)". This is supplemented by a requirement to achieve a 'reasonable' reduction in carbon emissions of at least 20 per cent, judged against a baseline of the relevant Target Emission Rate (TER) set out in the Building Regulations. There is also a requirement for proposals to explore "measures that enable sustainable lifestyles" for occupants", with supporting text elaborating on what this might mean in practice.

<sup>44</sup> District heating is the provision of heat to more than one dwelling from a central heat source. It is best suited to areas of high density living and especially in mixed use developments that spread the demand for heat during the day. Where there is a source of excess heat e.g. from a manufacturing plant, they are especially effective. District heating typically delivers carbon savings through the efficiency of scale, but where it can be combined with a low carbon heat source it can provide even more carbon savings. District heating is a form of 'decentralised energy', i.e. energy that is generated near where it is used, rather than at a large plant further away and supplied through the national grid. Energy can refer to electricity and heat, but there is a focus on heat in Guildford.

<sup>45</sup> The Guildford Renewable Energy Mapping Study (2015) is available at: <http://www.guildford.gov.uk/article/14418/Guildford-Renewable-Energy-Mapping-Study>. Also, the Council collaborated with the Carbon Trust in 2016, when finalising thresholds.

- 10.3.6 Other policies with minor positive implications for climate change mitigation include:
- Policy E2: Locations of new employment floorspace - given the support for directing development to Guildford town centre, where a mix of uses (residential and offices) will optimise potential for district heating; and
  - Policy ID1: Infrastructure and delivery - which references district heating schemes in the supporting text.

- 10.3.7 There is an argument to suggest that some other policies - notably D1 (Place shaping) and D3 (Historic environment) conflict with biodiversity objectives; however, on close inspection there seems little reason to suggest that policy wording unduly creates conflict. The plan will be read as a whole.

*Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.3.8 The plan leads to a reasonably strong likelihood of reduced average per capita CO<sub>2</sub> emissions from the built environment, given a focus on strategic scale schemes and the policy requirements set to be put in place (e.g. district heating options should be explored at residential only developments over 300 dwellings in size), and the lack of site-specific detail is not thought to be a problem (i.e. opportunities can probably be fully realised at the planning application stage). The plan performs well; however, **significant positive effects are not predicted**, recognising that climate change mitigation is a global issue.

**Targeted changes**

- 10.3.9 The proposal to increase the quantum of growth within Guildford town centre is supported, given the findings of Guildford Renewable Energy Mapping Study; however, the proposal to delete A46 (Land to the south of Normandy and north of Flexford) results in a missed opportunity. Also, the proposal to remove the employment land element of the Garlick's Arch, Send Marsh, scheme could also result in reduced opportunity to deliver district heating.
- 10.3.10 Significant changes to policy D2 (Sustainable design, construction and energy) are proposed, and these changes generally serve to increase the stringency of the policy. Notably, the reduction in carbon emissions that new buildings must achieve has been increased from 15 to 20 percent, albeit there is also a proposal to enable increase flexibility to deliver this reduction through off-site measures and/or offsetting measures.

## 10.4 Communities

**The Proposed Submission Plan 2017**

*Commentary on the spatial strategy*

- 10.4.1 The proposed growth quantum, determined in order to provide for objectively assessed housing needs (OAHN), creates tensions with community objectives given the valued local environment, and known issues of traffic congestion and community infrastructure capacity; however, it is difficult to conclude that the broad strategy performs poorly. This is on the basis that any unmet needs arising from Guildford Borough would have to be met elsewhere locally, and other areas are also heavily constrained. Furthermore, it is not possible to draw conclusions without giving consideration to the proposed spatial approach to accommodating growth alongside infrastructure upgrades.



- 10.4.2 When examining the merits of the spatial strategy in terms of ‘communities’ there are numerous overlapping issues that might be discussed, but an appropriate matter to focus upon here (recognising that other issues are discussed under ‘Health’, ‘Housing’, ‘Poverty and social exclusion’, ‘Transport’, ‘Safety and security’ and ‘Rural economy’) is the matter of community infrastructure (capacity / access). In this respect, the spatial strategy can be seen to have considerable merit, with **strategically important community infrastructure** to be delivered through development at –
- Gosden Hill (a secondary school; a local centre; traveller pitches; extensive open space (SANG); and transport infrastructure that contributes to the Guildford Sustainable Movement Corridor, including a rail station and park and ride); and
  - Blackwell Farm (a secondary school; a local centre; traveller pitches; extensive open space (SANG); and transport infrastructure that contributes to the Guildford Sustainable Movement Corridor, helping to facilitate the new rail station, and increasing accessibility to key destinations including the Hospital).
- 10.4.3 The preferred approach to growth within **Guildford town centre** also has merit in this respect. The quantum of homes proposed is less than in the draft Local Plan (2014), which raises some concerns given the extent to which services/facilities etc. are accessible; however, one of the reasons for reducing the quantum is the objective of maintaining existing services/facilities. For example, Guildford library and adult education centre are no longer allocations as it is not clear that there are suitable relocation options locally.
- 10.4.4 A 2,000 home **Wisley Airfield** scheme would support the achievement of certain community infrastructure objectives. In particular, a secondary school at Wisley Airfield would provide for sufficient school capacity for needs arising from the planned development of the site and, in combination with the school at Gosden Hill, provide for the additional educational need arising in the eastern part of the borough. **However**, Wisley Airfield is relatively distant from a town centre (albeit Ripley District Centre would be c.1km of the edge of the site). This gives rise to concerns in respect of accessing higher order services/facilities, and also traffic congestion. In respect to traffic, it is noted that planned upgrades to the M25 and A3 will alleviate problems, and that a requirement will be in place to ensure phasing of housing in line with infrastructure.
- 10.4.5 Growth at **Ash and Tongham** gives rise to some concerns, from a perspective of ensuring easy access to services/facilities. In total, the Ash and Tongham area (including Ash Green) is set to receive a quantum of growth comparable to Wisley airfield, but without comparable supporting uses and infrastructure.<sup>46</sup> On one hand this is problematic; however, on the other hand the approach to growth at Ash and Tongham is suitably restrained, with the proposal being to add land to the south of Tongham to the Green Belt rather than maximise growth.
- 10.4.6 With regards to growth at villages, most notable is the proposal to allocate three extensions of 100-150 homes into the Green Belt around the **Horsleys**; and allocate three housing sites (one larger, at 400 homes) plus a new Strategic Employment Site (SES) in the **Send** area. Sites at the Horsleys are broadly supported, from a communities perspective, given proximity to a District Shopping Centre (and a train station, which is something that the other District Shopping Centre at Ripley does not benefit from); however, there are potentially greater concerns at Send. There is little in the way of strategic ‘communities’ argument for the 400 home scheme at Garlick’s Arch, Send Marsh / Burnt Common (albeit the District Shopping Centre at Ripley is a relatively short distance away), and the possibility of in combination effects in respect of traffic congestion locally has been suggested. It is **recommended** that clarification be made regarding the risk of severe traffic congestion in the Send area, recognising that the floorspace requirement for the new SES is a minimum figure (with the site potentially having capacity for considerably more than this minimum figure).

<sup>46</sup> Small scale and incremental approach to development means that homes are being delivered here without the other mix of uses and supporting infrastructure that sites of this overall scale would normally deliver. This is particularly due to our current inability to pool contributions until the Council has a Community Infrastructure Levy (CIL) in place. The Council expects that planning applications in this area are likely to continue to come forward ahead of the new Local Plan and accompanying CIL, which will further exacerbate this issue.

- 10.4.7 Finally, there is a need to note that **insetting certain villages** from the Green Belt will have communities implications, in that an inset boundary will create some development opportunities where previously they would have been considered inappropriate development in the Green Belt. Villages were identified for inseting on the basis of national policy and the evidence provided by the Green Belt and Countryside Study, but the Council has responded through policy, in particular ensuring that policy is in place to protect open space and village character, which is known to be important to rural communities. Notably, the plan includes Policy D4 (Character and design of new development), which refers specifically to design considerations within villages, and a new designation of Open Space (Policy ID4).

*Commentary on other policies*

- 10.4.8 Policy H1 (Homes for all) sets out to ensure new development provides a mix of housing tenures/types/sizes, with a view to meeting the accommodation needs established by the latest Strategic Housing Market Assessment (SHMA), recognising that “Sufficient housing to meet the needs of the borough’s population will ensure that the borough thrives, with mixed, balanced communities”. Detailed discussion is presented below, under ‘Housing’, but from a ‘communities’ perspective it is notable that there is a focus on student housing and houses in multiple occupation (HMOs):
- Whilst students should have a choice of accommodation, this should be balanced with the housing needs of the general population, for example recognising that a concentration of homes leased to students can result in empty properties outside term time and impact on the vitality of an area. Hence, to minimise the pressure on the existing housing stock, 60% of the University of Surrey eligible student population (full time equivalent) is expected to be provided with accommodation on campus.
  - With regards to HMOs, proposals to convert a house into an HMO (where planning permission is required, recognising that planning permission is not required to convert a dwelling house to an HMO for less than six people) must not adversely affect: “the balance of housing types and character of the immediate locality”.
- 10.4.9 Policy H3 (Rural exception homes) is important from a ‘communities’ perspective, recognising that in many rural Green Belt areas high house prices restrict the potential for resident and newly-forming households, and those working in the parish, to live within and contribute fully to the community. People in this situation will benefit from the policy that allows for affordable housing provided on small sites in rural areas on Green Belt land, as an exception to other planning policies. Importantly, the policy requires that: “the affordable homes are all secured in perpetuity.” Legislation is in place to allow this (through the setting of a ‘planning obligation’), and the policy seeks to respond to the legislation. The provision of rural exception housing is quite a complex matter, and hence the supporting text to the policy covers a range of issues including the role of ‘Local Rural Housing Needs Surveys’.
- 10.4.10 Policy D1 (Place shaping) is prepared in the knowledge that: “Good design will influence how people move around our settlements, how they interact and how places make people feel.” The policy differentiates between developments over and above a 25 home threshold, and is high-level in the knowledge that: “This policy forms the strategic element with more detailed policy to follow as we form the development control policies.” Despite the high-level nature of the policy, it should have the effect of supporting the creation of inclusive places, with a mix of uses and good ‘accessibility’, in particular through walking or cycling.
- 10.4.11 Policy ID1 (Infrastructure and delivery) seeks to ensure the timely provision of suitable, adequate infrastructure recognising that historically infrastructure provision and upgrading has not always kept pace with the growth of population, and some infrastructure is currently at or near to capacity, or of poor quality. The policy is clear that: “Where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused.” The Infrastructure Delivery Plan that supports this Plan focuses on a range of types of infrastructure, including GPs and dental surgeries, hospital and community health care, libraries, cemeteries, and sports facilities.

10.4.12 Policies E7 - E9 (Retail and Service Centres) set out to ensure a hierarchy of retail and service centres, of differing scale and functions, that complement one another and meet the needs of communities. The hierarchy consists of a single town centre in Guildford, one urban and two rural district centres, and 21 local centres across our towns and villages. Specifically, the policies seek to address the role and function of each centre by controlling its size and mix of uses. Within Guildford town centre suitable uses are defined within two zones - a primary and secondary shopping area - whilst within district centres and local centres just a single zone is defined. Within Guildford town centre, policy notably seeks to address the fact that:

- “The cumulative impact of concentrations of restaurants, take-aways, bars and pubs can cause problems for town centre residents... As we are encouraging more people to live in the town centre, we must ensure that new food and drink uses do not harm their amenities.”
- “Consumer habits are changing and to be a successful town centre in the future will involve strengthening the retail offer and diversifying... The town centre will become more important as a focus for our leisure time, and the enhancement of the riverside, buildings and public spaces between them will contribute to this diversification.”

10.4.13 Other policies with minor positive implications for communities include:

- Policy H2: Affordable Homes;
- Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value - recognising the value that rural communities place in local character and amenity;
- Policy P2: Green Belt;
- Policy P3: Countryside;
- Policy E5: Rural economy;
- Policy E6: The leisure and visitor experience;
- Policy ID4: Green and blue infrastructure.

*Appraisal of the Proposed Submission Plan 2017 as a whole*

10.4.14 Assuming appropriate phasing of infrastructure delivery alongside housing growth (as required by Policy ID1), the plan should lead to a situation whereby development leads to ‘sustainable’ new communities and also wide ranging benefits to existing communities (e.g. in respect of secondary school provision). Having said this, it is recognised that some aspects of the strategy are less than ideal, and many uncertainties exist, including in respect of traffic congestion. **Significant positive effects** are predicted, but with some uncertainty.

N.B. Matters relating to planning for the Traveller community are discussed under ‘Housing’.

#### Targeted changes

10.4.15 The proposal to delete A41 (Land to the south of West Horsley) is supported, from a ‘communities perspective’, as it should help to reduce the risk of sites impacting in combination at the Horsleys. However, at Send Marsh / Burnt Common, which is the other village where significant expansion is proposed, the effect of targeted changes is to increase the concentration of growth / extent of change, through the addition of a new employment allocation (A58 Land around Burnt Common warehouse) and a requirement that A43 (Land at Garlick’s Arch) should deliver Travelling Showpeople plots.

10.4.16 The proposal to delete A46 (Land to the south of Normandy and north of Flexford) potentially results in something of a missed opportunity, as the proposal was to deliver a new local centre where currently there is none to serve the villages of Normandy and Flexford. The scheme was also set to deliver a secondary school; however, this is no longer needed, as the Blackwell Farm extension to Guildford can deliver one in a preferable location.

## 10.5 Economy and employment

### The Proposed Submission Plan 2017

#### *Commentary on the spatial strategy*

- 10.5.1 The proposed **housing** growth quantum, determined in order to provide for objectively assessed housing needs (OAHN), performs well on the basis that the OAHN figure was determined after having taken into account the number of homes needed locally to ensure that growth in the local workforce keeps pace with jobs growth. However, there are arguments to suggest that a higher level of housing growth could have merit, recognising that Guildford residents will also work in Woking and elsewhere in the Functional Economic Area (FEMA), and that at the FEMA-scale there is set to be an undersupply of housing. The following is a key quote from the 2015 SHMA –

*“Housing provision below [OAHN within the West Surrey HMA / FEMA] could potentially constrain economic growth locally, or result in changes to commuting dynamics. Should the Councils seek to change commuting dynamics, we would recommend that the feasibility of this is tested in detail and considered.”*

- 10.5.2 A quantum of land is allocated for **employment floorspace** in line with findings of the Employment Land Needs Assessment (ELNA). With regards to distribution –

- Offices and research / development - There is a focus on supporting an extension to Surrey Research Park Strategic Employment Site (SES) through the Blackwell Farm allocation, a new SES will be delivered through the Gosden Hill Farm allocation and a new Locally Significant Employment Site (i.e. a second tier site, subject to different policy through proposed Policy E1) will be delivered through the Wisley Airfield allocation. The focus on Surrey Research Park Strategic is supported, given a unique opportunity to expand the local knowledge-based economy, which is of regional significance, and recognising that this type of specialist employment cannot be provided elsewhere in the borough. The sites at Gosden Hill Farm and Wisley Airfield benefit from good access to the A3 and M25.
- Industrial and storage - The proposal is to allocate a new site at ‘Land around Burnt Common warehouse, London Road, Send’. This site is adjacent to the A3 and has the potential to expand in the future (i.e. additional floorspace over and above the 7,000m<sup>2</sup> allocated through the plan could be delivered within the site boundary, were a new ELNA to show that there is a need). The site also benefits from being adjacent to (indeed surrounding) a small existing employment site, albeit it is recognised that this is a minor consideration. All other things being equal it would be preferable to expand an existing strategic site, e.g. Slyfield Industrial Estate.<sup>47</sup>

N.B. SESs – existing and proposed - can be seen on the Key Diagram (Figure 9.2, above). The proposal is to extend one SES (Surrey Research Park) and deliver two new SESs (Gosden Hill and Burnt Common).

- 10.5.3 This approach is supported, although there is inevitably some uncertainty. For example, the ELNA (2017) states –

*“Demand for employment land within Guildford could be higher than these and land floorspace forecasts. Employment within the borough has the potential to grow more quickly than currently anticipated, while demand for additional space on the part of businesses already located within the borough could be higher given the extent to which employment densities have risen in recent years... Consultation with property market agents and research also suggests that currently around 70% of office demand is met in out-of-centre locations and 30% in Town Centres. However, the analysis indicates that in the future, needs could increasingly be met in town centre locations, subject to availability of appropriate sites...”*

<sup>47</sup> An alternative site exists on the edge of Slyfield Industrial Estate; however it is high sensitivity Green Belt.

*Commentary on other policies*

- 10.5.4 Policy E1 (Sustainable employment) establishes the amount of new employment land ('B class' land, for offices, research and development and industry/distribution) that must be provided for in order to meet the objectively assessed needs established by ELNA (see discussion above); and also establishes that in order to meet OAN there is a need to protect existing employment land (with a distinction between the approach to 'Strategic Employment Sites' and 'Locally Significant Employment Sites'). Importantly, the policy also aims to: "ensure sustainable employment development patterns, promote smart growth and business competitiveness, and allow flexibility to cater for the changing needs of the economy." It is to this end that the existing diversity of employment land is set to be retained, refurbishment of employment floor space (especially office space) is encouraged and new sites are supported in the most commercially attractive locations.
- 10.5.5 Policy E2 (Location for new employment floorspace) defines a Guildford-specific sequential approach to locating new employment sites. With regards to office development (B1a) and research / development floorspace (B1b) the preferred location is in Guildford town centre; then edge of centre locations within 500m of a public transport interchange (as defined by the policy) then the existing Strategic Employment Sites. With regards to industrial and storage development (B2 and B8), a sequential approach means directing proposals to the strategic industrial sites and the sites identified as suitable in the LAA.
- 10.5.6 Policy E3 (Maintaining employment capacity and improving employment floorspace) responds to the national policy of permitted development rights, which has resulted in a significant amount of office floorspace being lost, particularly in Guildford town centre (in addition to employment floorspace lost over the years because of the higher land values of residential use). As a result of these losses, and also the projected need for employment floorspace over the plan period, the policy seeks to protect floorspace to accommodate existing and future demand. Notably, for different categories of employment floorspace, the policy establishes the length of 'active and comprehensive marketing' that must be undertaken prior to change of use being accepted. A requirement for evidence of two years active marketing is considered to be appropriate on the Strategic Employment Sites, with less time for other sites.
- 10.5.7 Policy E4 (Surrey Research Park) responds to the fact that one of the key successes of the Surrey Research Park has been its focus on knowledge transfer and facilities to support the commercial application of the University's research. The policy aims to support the Research Park to retain its focus - i.e. seeks to restrict employment uses not in line with the current focus - recognising the potential to contribute to the regional economy.
- 10.5.8 Policy E6 (The leisure and visitor experience) reflects the fact that, despite the borough's unique attributes and the current high value of leisure/tourism to the local economy, there is scope for improvement in the scale and quality of the offer, particularly in Guildford town centre). There is a need for a dedicated policy that is supportive of growth, but equally recognises that there are particular sensitivities to be accounted for. Notably, the policy references the need for rural tourism and leisure developments to respect their local context; and that proposals affecting the River Wey must respect biodiversity and water quality.
- 10.5.9 Policy H1 (Homes for all) sets out to ensure new development provides a mix of housing tenures/types/sizes, appropriate to the site size, characteristics and location, with a view to meeting the accommodation needs established by the latest Strategic Housing Market Assessment (SHMA). As well as the benefits it can provide to people's lives, families and communities, suitably sized, priced and located housing can also help to support the economy by ensuring people with a wide variety of occupations can live in the borough.



- 10.5.10 Other policies with minor positive implications for the economy/employment include:
- Policies E7 - E9: (Retail and Service Centres);
  - Policy H2: Affordable Homes;
  - Policy D2: Sustainable design, construction and energy - given employment generation;
  - Policy ID1: Infrastructure and delivery - recognising that traffic congestion is a problem; and
  - Policy ID2: Supporting the Department for Transport's "Road Investment Strategy".

- 10.5.11 There is an argument to suggest that a range of other policies conflict with economy/employment objectives; however, on close inspection there seems little reason to suggest that policy wording unduly creates conflict. The plan will be read as a whole.

*Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.5.12 The plan performs well on the basis that identified opportunities are set to be capitalised upon, including growth of the Guildford knowledge-based sector. The 2016 appraisal concluded significant positive effects, and the 2016 plan was broadly supported by the Enterprise M3 Local Enterprise Partnership (LEP). The current plan reflects a lower growth strategy, but still a strategy of providing for the SHMA assigned OAHN figure and providing for the employment land target assigned by the ELNA. As such, **significant positive effects are predicted**.

*Targeted changes*

- 10.5.13 The main change is the proposal to remove the employment land element of A43 (Land at Garlick's Arch, Send Marsh Burnt Common and Ripley) and instead provide for a similar quantum of employment land at a more suitable stand-alone employment site - A58 (Land around Burnt Common warehouse, London Road, Send).
- 10.5.14 Also of note is the proposal to remove the Broadford Business Park housing allocation, and therefore maintain the current employment use. Whilst this is a relatively poorly performing non-strategic employment location, it adds to the diversity of office floorspace in the borough.
- 10.5.15 Finally, with regards to retail, it is noted that the proposal is to reduce the amount of retail at North Street Redevelopment, Guildford, from 45,000m<sup>2</sup> to 41,000m<sup>2</sup>, to reflect the latest retail needs study and evidence of demand. The housing capacity has also been increased to up to 400 homes, and the food and drink floorspace increased from 3,000 to 6,000m<sup>2</sup>, with the caveat that, should it be demonstrated that this overall scale of development cannot be appropriately accommodated on the site, the residential element will need to be reduced.

## 10.6 Flooding

*The Proposed Submission Plan 2017*

*Commentary on the spatial strategy*

- 10.6.1 Flood risk is a considerable constraint to growth, as established through Strategic Flood Risk Assessment (SFRA), and this constraint is reflected in the spatial strategy, as evidenced by the number of sites proposed for allocation in the draft Local Plan (2014) that are now not proposed for allocation. Most notably, the quantum of homes now proposed in Guildford town centre is less than in the draft Local Plan (2014). This is following a re-appraisal of sites close to the River Wey, particularly in the Walnut Tree Close area. Close examination has established that sites do not pass the 'sequential test', in that there are reasonably available appropriate alternative sites at less risk of flooding.
- 10.6.2 Whilst flood risk has been applied as a constraint to growth, with a sequential approach taken, **the plan does not avoid areas of flood risk entirely**. The final conclusion of the Sequential and Exception Test Report (2016) was that –

*“The sequential test has been applied, and is passed for the sites listed as Proposed Submission Local Plan (2016) site allocations...”*

*The exception test has been applied where required. Part 1 has been passed for the sites discussed, and part 2 will be considered in more detail at the development management stage, informed by the Level 2 SFRA. Whilst it is considered that the exception test is not required for the residential development proposed, as the site allocations policies will not allow residential development within flood zone 3, the exception test has been applied none the less and is deemed to be passed. In accordance with the flood risk compatibility table in the NPPG, the exception test is not required for less vulnerable uses in flood zone 3 (i.e. the cinema site, and 77-83 Walnut Tree Close, both in Guildford).”*

- 10.6.3 For both proposed sites, site-specific policy is set to require a range of measures including “flood risk betterment... hav[ing] regard to the recommendations of the Level 2 SFRA.”
- 10.6.4 Policy A6 (North Street, Guildford) is also of note as there is a degree of lesser flood risk, and the site is proposed as a retail-led scheme with some residential. In this case, the proposed allocation is appropriate given that retail development is needed and is suited to a town centre location, and given that residential uses can be directed to the part of the site at least risk, with policy stating: “Avoid development of high or medium vulnerability uses in flood zone 2 (medium risk) and flood zone 3 (high risk).”
- 10.6.5 Other sites intersect the flood risk zone, but there is an expectation that vulnerable development, if not all development, can avoid the flood risk zone (i.e. the flood risk zone can be retained as open space, or indeed used for flood attenuation measures). For example (and notably) Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (Policy A43) is bisected by a stream, but policy will require that: “Avoid development in flood zones 2 and 3; No increase in flood risk on site or elsewhere.”
- 10.6.6 Finally, it is noted that numerous sites are at risk of surface water flood risk, and where this is the case policy will require: “Appropriate surface water flooding mitigation measures, with specific regard to the Guildford Surface Water Management Plan and Level 2 SFRA.”

*Commentary on other policies*

- 10.6.7 Policy P4 (Flooding, flood Risk and groundwater protection zones) seeks to avoid vulnerable development in flood risk zones, in-line with national policy, and also states that: “All development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off. Proposals should have regard to appropriate mitigation measures identified in the Guildford Surface Water Management Plan or Ash Surface Water Study [e.g. Sustainable Drainage Systems, SuDS]”.
- 10.6.8 Policy E7 (Guildford town centre) sets out a positive vision for the town centre, recognising that consumer habits are changing and to be a successful town centre in the future will involve strengthening the retail offer and diversifying to include other town centre uses. The town centre will become more important as a focus for our leisure time, and the enhancement of the riverside, buildings and public spaces between them will contribute to this diversification. This creates some tensions with flood risk objectives; however, it is anticipated that this can be managed. Work continues to consider flood risk alleviation schemes for the town centre.

N.B. The 2016 SA Report **recommended** that there should be a clear policy mechanism, or commitment, in relation to responding to change and thereby ensuring maximum growth in the town centre. This recommendation remains outstanding at the current time, although it is noted that the Council has published a regeneration strategy, informed by a town centre masterplan. The Council state a commitment to “*promote development opportunities within the town centre, as part of a brownfield first approach. Should it be considered appropriate, the opportunity exists to produce a Town Centre AAP, which could allocate further sites.*”

*Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.6.9 The spatial strategy reflects a sequential approach to avoiding flood risk wherever possible. Three sites in Guildford town centre will involve development within an area of flood risk; however, vulnerable uses (e.g. residential) will not be at risk, and, in all cases, the proposed use is needed and suited to the site, i.e. development will bring wider benefits. The plan performs well; however, **significant effects are not predicted**. Whilst the absence of a plan – i.e. the baseline situation – could mean greater risk of vulnerable uses coming forward in areas of flood risk, particularly Guildford town centre, it is not clear this would be the case.

**Targeted changes**

- 10.6.10 In Guildford town centre the proposal is to remove A4 (the Telephone Exchange), which is not subject to flood risk, and increase the number of homes at A5 (Jewsons, Walnut Tree Close, Guildford) and A6 (North Street redevelopment, Guildford) where there is a degree of flood risk. The former site intersects the flood risk zone, but there is confidence in being able to avoid vulnerable uses in the at risk area. The latter site falls within flood risk zone 1 (lowest risk), but there are concerns regarding flood risk affecting safe access/egress. This matter will be the focus of forthcoming SFRA level 2 work.
- 10.6.11 The other notable change to the spatial strategy relates to the proposal to add Travelling Showpeople plots to A43 (Land at Garlick's Arch, Send Marsh / Burnt Common) in place of employment land. Travelling Showpeople Plots represent a more sensitive use; however, the area of land needed to accommodate six travelling showpeople plots is less than the area of land that was previously expected to be used for employment, thereby indicating that there will be sufficient space within the site to avoid locating vulnerable uses in the flood risk zone.
- 10.6.12 Finally, it is noted that several additions to Policy P4 (Flooding, flood risk and groundwater source protection zones) are proposed. Specifically, the proposal is to add reference to the importance of taking account of climate change, and also to take account of “up to 1 in 100 year chance of flooding with an appropriate allowance for climate”. It is noted, however, that there is no added reference to flood storage capacity, which is notable given the following representation received from Spelthorne Borough Council in 2016:

*“The primary river in Guildford is the River Wey and its tributaries enter the River Thames at Shepperton. Spelthorne BC would be concerned if a reduction of floodplain storage in its upper catchment would result in greater flood water levels entering the Thames and affecting Spelthorne. This Council would therefore agree that Policy P4 on flood risk should ensure that flood storage capacity is maintained and ideally bettered, as any loss in capacity could lead to increased flows downstream.”*

**10.7 Health**

**The Proposed Submission Plan 2017**

*Commentary on the spatial strategy*

- 10.7.1 The sustainability objective here overlaps considerably with a number of other sustainability objectives including those relating to ‘Communities’, ‘Housing’, ‘Poverty and social exclusion’ and ‘Transport’. Given the need to avoid overlap and repetition, it is appropriate to focus on a number of specific issues -
- Access to a GP surgery – All of the proposed allocations would enable access to a GP surgery, and there is little potential to conclude on the ability of surgeries to accept additional patients or expand. The proposed allocation at Send Marsh / Burnt Common (400 homes) stands out as being some distance from a GP surgery, although it is noted that the GP surgery at Send is located midway between Send and Send Marsh/Burnt Common.

N.B. the 2016 SA Report **recommended** that site-specific policy for Wisley Airfield should be modified to explicitly require a GP surgery, recognising the distance to the nearest existing surgery with capacity to expand (East Horsley). The Council has actioned this recommendation, with the following requirement: *“Other supporting infrastructure must be provided on the site, including a local retail centre including a GPs surgery and community building, open space (not associated with education provision) including playgrounds and allotments; and a two-form entry primary school to serve the development.”*

- Royal Surrey County Hospital - will potentially benefit from the Blackwell Farm development given much needed new housing, including affordable housing, in close proximity to the hospital; and given that the development will contribute towards the delivery of the new Guildford West (Park Barn) railway station which should enhance accessibility to the hospital. However, there are equally some concerns regarding traffic congestion. The Hospital responded the 2016 consultation, stating:  
  
“The Royal Surrey County Hospital supports the developments listed under Policy Sites A16 and A17 [two smaller brownfield allocations close to the hospital]. This will improve the provision of low cost affordable housing for hospital and key worker staff. This will ensure the hospital is better [able] to attract and retain staff both now and in the future. The development of these areas is overdue.”
- Health deprivation – The Index of Multiple Deprivation (IMD) ‘Health and Disability’ domain dataset shows there to be some notable concentrations of relatively poor health, particularly to the west (Westborough / Park Barn) and north (Bellfields / Slyfield) of the Guildford urban area. With regards to Westborough / Park Barn, the Blackwell Farm extension being to the southwest may have some bearing, given that Guildford West (Park Barn) station will benefit the local area. Also, it is noted that Policy A20 (Former Pond Meadow School, Pond Meadow) allocates a site in Park Barn for a new community hub. With regards to Bellfields / Slyfield it may be that the Slyfield Area Regeneration Project (SARP) will lead to some benefits. The 1,500 home scheme will deliver some new employment and community uses, and improve the local environment with increased access to the river; plus the following policy requirement is noted: *“Developer to provide the northern route section of the Sustainable Movement Corridor on the site and make a necessary and proportionate contribution to delivering the northern route section on the Local Road Network.”* It is **recommended** that policy more explicitly addresses regeneration issues.
- Allotments – The proposal is to allocate sites for allotments, totaling 3.76 ha. This quantum is significant, but short of that stated as necessary by the Guildford Allotments Society, through their representation on the Proposed Submission Plan (2016): *“... around 140 additional allotment plots, within some 4.4 hectares in total, should be provided on several new sites within the borough to ensure that the number of plots is broadly sufficient when these additional houses are built. The sites need to broadly be in the right locations, close to where the tenants live, to comply with your planning policies.”*
- Active travel – The spatial strategy performs well, e.g. on the basis that there is a good degree of development directed to the Guildford urban area, where there will be good potential for residents to walk/cycle to key destinations. Wisley Airfield stands out as a more isolated location; however, residents would benefit from particularly good access to high quality countryside and open space in the form of SANG (as its proximity to the SPA means that it must deliver enhanced SANG). Whilst not all strategic allocations will deliver SANG on-site, all SANG will be nearby (and therefore accessible).

- Air quality – The recently prepared Air Quality Review (2017) for the Local Plan concludes: “... the findings of the air quality review suggest that the effect of the proposed Local Plan on annual mean NO<sub>2</sub> concentrations will be negligible in the majority of the GBC administrative area. However, further detailed modelling would be advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors, specifically: A3, Ripley Bypass; Aldershot East; and the area around the A3/A31 junction at Onslow Village.” Site specific policy responds to this recommendation, with ‘potential air quality issues’ listed as a ‘key consideration’ for Wisley Airfield, Slyfield Area Regeneration Project (SARP), Blackwell Farm and Gosden Hill.

N.B. The 2016 SA Report discussed potential air quality issues specific to the Wisley Airfield; however, the latest position is now reflected in the following statement made through the Air Quality Review (2017):

“Due to the size of the allocated area, and the additional areas discussed below, it is likely there will be a large increase in local traffic flows, particularly on the A3 passing close to the north of the site allocation which would provide vehicular access to the area. The change in vehicle flows on the A3 is anticipated to be over 21,000 vehicles per day. A change in flows of this magnitude has potential to lead to a significant adverse effect on air quality at sensitive receptors. Although there are only a small number of properties along this section of the A3, it is recommended that detailed modelling is undertaken due to the very large changes in traffic flows predicted.”

#### *Commentary on other policies*

- 10.7.2 Policy ID3 (Sustainable transport for new developments) seeks to complement the spatial strategy, by promoting the use of sustainable transport modes and improvements to the transport network that will mitigate development. The policy refers to a range of measures, and the supporting text helpfully summarises that: “Measures designed to encourage people to make sustainable travel choices... can include car clubs, car sharing, facilities for electric charging plug-in points and other low and ultra-low emission vehicles, encouraging the accelerated uptake of cleaner fuels and technologies resulting in carbon and vehicle emission reductions, the provision of cycle infrastructure, pedestrian wayfinding and cycle parking, including for adult tricycles which can be suitable for those with disabilities and older people concerned about their balance, and the marketing and promotion of sustainable travel choices, for instance the provision of resident travel information packs. Well-designed developments may actively help to enhance air quality and reduce overall emissions, therefore reducing possible health impacts.”
- 10.7.3 Policies E7 - E9 (Retail and Service Centres) requires that: “Proposals for new food takeaways within 500m of schools will not be accepted because of the potential negative impact on the health of school children.”
- 10.7.4 Other policies with minor positive implications for the health include:
- Policy H1: Homes for all;
  - Policy D1: Place shaping;
  - Policy ID1: Infrastructure and delivery; and
  - Policy ID2: Supporting the Department for Transport’s “Road Investment Strategy”.
- 10.7.5 There is an argument to suggest that some other policies - e.g. Policy D2 (Sustainable design, construction and energy), recognising that combined heat and power generation (CHP) can give rise to localised air pollution - conflict with health objectives; however, on close inspection there seems little reason to suggest that policy wording unduly creates conflict. The plan will be read as a whole.



*Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.7.6 The plan should support good health amongst residents, primarily through supporting walking, cycling and access to open space, and ensuring good access to health services; however, there is some uncertainty given much relies on timely infrastructure delivery. Certain allocations in the Guildford urban area, and more generally plans for a Sustainable Movement Corridor, are positive from a health perspective; however, it is not clear that site-specific policy is in place to capitalise fully on opportunities. The spatial strategy appears to be supportive of the Royal Surrey County Hospital's functioning; however, this will need to be confirmed in light of transport modelling work. **Significant positive effects** are predicted, but with uncertainty.

*Targeted changes*

- 10.7.7 Proposed changes to the spatial strategy have little or no implications for health, whilst proposed changes to site specific policy (particularly regarding air quality; see discussion above), responding to the Air Quality Review (2017), are supportive of good health. It is also noted that there is a new reference to a "potential noise and air quality issues adjacent to the A31 and A331" at A29 (Land to the south and east of Ash and Tongham); and to 'disturbance', within Policy E8 (District centres) and Policy E9 (Local centres and isolated retail units).

**10.8 Historic environment**

*The Proposed Submission Plan 2017*

*Commentary on the spatial strategy*

- 10.8.1 A primary consideration is the need to avoid impacts to: listed buildings and their setting; conservation areas (within which there will typically be a concentration of listed buildings). Guildford has over 1,000 statutory listed buildings (as well as over 200 locally listed buildings), 40 conservation areas, eight historic parks and gardens (as well as 52 locally important parks and gardens) and 24 scheduled ancient monuments.
- 10.8.2 It is not clear that the spatial strategy will result in a risk of direct impacts to the setting of a Conservation Area. Of course, there are sensitivities within Guildford town centre, but site-specific policy is set to be put in place to ensure sympathetic design. Within the wider urban area, Policy A15 (Land at **Guildford Cathedral**, Alresford Road) is notable, given proximity to the Grade II\* listed cathedral. Here, policy is set to require that development "Retain[s] strategically important views of the Cathedral and its setting across the town" and is "Sensitive to the setting of the [building]."
- 10.8.3 A notable concern relates to the **Wisley Airfield** site (2,000 homes), which abuts the northern extent of the Ockham Conservation Area (although it is noted that there is only one grade 2 listed building in this part of the conservation area). Also, another listed building is located close to the site's south-eastern extent, at Martyr's Green; and there is a likelihood of increases to traffic through the Ripley Green and Ockham Conservation Areas (the former associated with a high concentration of listed buildings). Also, the two conservation areas at the Horsleys, despite being located some distance from proposed housing development sites, could be impacted by increased traffic. There should be good potential to mitigate impacts, with proposed site-specific policy requiring: "Sensitive design at site boundaries that has significant regard to the transition from village to greenfield" and also "mitigation to address the impacts on Ripley High Street."

N.B. The 2016 SA Report **recommended** that site-specific policy for Wisley Airfield should be strengthened, and the Council has actioned this recommendation.

#### *Commentary on other policies*

- 10.8.4 Policy D3 (Historic environment) is a high-level policy in-line with the NPPF requirement to provide a positive strategy for the conservation and enjoyment of the historic environment. The intention is to further develop the strategy towards the conservation of the historic environment in the Local Plan: Development Management Policies document. The supporting text identifies issues that might be addressed through policy, but which are not an explicit focus of the current proposed high level policy, including the need to support “heritage-led regeneration” recognising that: “Conservation can play a key part in promoting economic prosperity by ensuring that an area offers an attractive living and working environment that will encourage inward investment.”
- 10.8.5 Policy E6 (The leisure and visitor experience) sets out to “increase the contribution that tourism, arts, cultural heritage and sport make to our quality of life and social and cultural well-being” and states that: “All new and enhanced leisure and visitor attractions and facilities will be required to preserve the borough’s special heritage and natural features.”
- 10.8.6 Policy D1 (Place shaping) does not reference the historic environment; however, Policy D4 (Character and design of new development) requires all development to “respond meaningfully and sensitively to the site, its characteristics and constraints...” Policy D4 also requires that: “proposals for new development within villages will have particular regard to: the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape; important views of the village from the surrounding landscape; [and] views within the village of local landmarks.”
- 10.8.7 There is an argument to suggest that some other policies - e.g. Policy E7 (Guildford town centre) - conflict with historic environment objectives; however, on close inspection there seems little reason to suggest that policy wording unduly creates conflict. Rather, it seems likely that the application of policies in combination will enable historic environment considerations to gain an appropriate degree of prominence.

#### *Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.8.8 The spatial strategy will avoid direct impacts to sensitive village conservation areas (although there is some risk at Wisley, which abuts the Ockham Conservation Area), although the risk for indirect impacts as a result of increased traffic remains. Other areas/assets (e.g. Guildford town centre Conservation Area, and Guildford Cathedral) will likely be protected through site-specific policy (guiding design and layout), and there may be some opportunities for enhanced appreciation of the historic environment. Thematic policy is also of note here, in particular policy for Guildford town centre and that addressing the visitor/leisure experience. The plan performs well, and it is noted that Historic England stated their support for the Proposed Submission Plan in 2016; however, **significant effects are not predicted**.

#### *Targeted changes*

- 10.8.9 A notable change to the spatial strategy relates to the proposal to remove two sites from the Horsleys, and in particular A36 (Hotel, Guildford Road, East Horsley). This is a brownfield site, but its redevelopment could potentially have implications for the nearby East Horsley Conservation Area. None of the remaining sites at the Horsleys are in proximity to the conservation areas, and the lower growth quantum should reduce the likelihood of in-combination effects.
- 10.8.10 With regards to thematic policy, the changes to policies D1 and D4 are of note. There is now a clear distinction between the policies, in that Policy D1 should apply to major new developments (‘place-shaping’), whilst Policy D4 should apply to development within villages, which will inevitably be small scale. The proposal is also that Policy D4 should apply to all villages, regardless of whether or not a village is ‘washed over’ by the Green Belt, or ‘inset’ from the Green Belt. In practice, the policy will be most applicable to inset villages though, as washed-over villages will be subjected to more limited development proposals.

## 10.9 Housing

### The Proposed Submission Plan 2017

#### *Commentary on the spatial strategy*

- 10.9.1 In line with para. 47 of the National Planning Policy Framework (**NPPF**), local planning authorities should: “use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with [principles of sustainable development].”
- 10.9.2 As such: a Strategic Housing Market Assessment (**SHMA**) study for the West Surrey housing market area (HMA) - which comprises Guildford, Woking and Waverley - was published in September 2015, thereby superseding the draft West Surrey SHMA from 2014; and then a Guildford SHMA addendum was published in 2017, providing a factual update for Guildford, reflecting the latest data (in particular, the 2015 mid-year population estimate, the 2014-based population and household projections and the latest economic forecasts).
- 10.9.3 The aim of SHMA is to establish Objectively Assessed Housing Needs (**OAHN**) at the functional scale of the West Surrey HMA, and also for the component authorities. The SHMA goes through a number of considerations in turn, before arriving at final OAN figures. Taking account of demographic needs and uplifts, the conclusion of the SHMA Addendum (2017) is that Guildford Borough’s OAHN is 654 dpa, or 12,426 in total (2015-34).
- 10.9.4 In light of these points, the preferred broad strategy performs well as allocating enough land to deliver above OAN *in theory* (i.e. allocating land to deliver OAN plus a buffer) should ensure that **OAN is achieved in practice**, recognising a necessarily high reliance on large (‘strategic’) sites results in a risk that one or more sites will deliver slower than anticipated.
- 10.9.5 Another consideration is the **trajectory** of housing delivery, and in particular ensuring that sites are in place that will deliver in the early part of the plan period (such that there is a ‘five year land supply’ at the time of plan adoption). In this respect, the preferred approach also performs well (in that there is a reliance on smaller sites at villages partly because these sites are ‘deliverable’), albeit there remains some risk of a dip in the housing trajectory in the early part of the plan period, given a reliance on strategic sites.
- 10.9.6 With regards to the spatial strategy / **distribution**, there is limited potential to draw strong conclusions. A focus on strategic sites is to be supported from a perspective of ensuring a good mix of housing types and tenures; however, the fact that development viability is high across Guildford Borough means that this is less of a factor.
- 10.9.7 One other issue relates to housing development near to the university, where there is high demand for purpose built **student accommodation**. The Council has decided to resist this demand along Walnut Tree Close, where the Council considers that the priority is for normal (use class C3) housing (~330 homes across three sites), which does not preclude student occupation. However, two sites - ‘Land at Guildford College’ and ‘The University of Law, Guildford’ - are allocated for a student accommodation.
- 10.9.8 With regards to **site-specific policy**, there is a requirement for the strategic scale schemes to including “some specialist housing and self-build plots” and in certain instances there are also additional specific requirements. Specifically, at Wisley Airfield there is a requirement for “Approximately 100 sheltered/Extra Care homes (C3 use)”; and at Keens Lane there is a requirement for “a care home (C2)”. The SHMA identifies a need for specialist housing, but does not quantify this.

- 10.9.9 Finally, sites are allocated to meet the needs of the Traveller community. The Council's preferred approach is to meet need through: A) Direct provision; B) Making temporary permissions permanent and insetting, where appropriate; and C) Provision as part of sites over 500 homes (as set out in policy H1). The difficulty in finding suitable sites has meant a need to accept the loss of sensitive Green Belt in a number of locations – see **Table 10.1**.

*Table 10.1: Commentary on proposed Traveller site allocations, including Green Belt sensitivity*

Allocation	GB sensitivity	Commentary
A25 Gosden Hill Farm, Merrow Lane, Guildford	Medium	<ul style="list-style-type: none"> <li>- Strategic development site, allowing for successful integration and access to facilities.</li> </ul>
A26 Blackwell Farm, Hogs Back, Guildford	Medium	
A35 Land at former Wisley airfield, Ockham	Medium	
A24 Slyfield Area Regeneration, Guildford	N/a	
A43 Land at Garlick's Arch, Send Marsh	High	
A49 Palm House Nurseries, Normandy	High	<ul style="list-style-type: none"> <li>- Temporary planning permission; proposed to make permanent</li> </ul>
A50 Whittles Drive, Normandy	High	<ul style="list-style-type: none"> <li>- Intensification of an existing permanent site</li> <li>- Travelling Showpeople plots</li> </ul>
A51 Land at Cobbetts Close, Worplesdon	High	<ul style="list-style-type: none"> <li>- Redevelopment and intensification of an existing permanent site, to include improvement in living conditions for all</li> </ul>
A52 Four Acre Stables, Aldershot Road, Worplesdon	High	<ul style="list-style-type: none"> <li>- Temporary planning permission; proposed to make permanent</li> <li>- Balancing of personal circumstances and harm to GB</li> </ul>
A53 Roundoak, White Hart Lane, Wood Street Village	High	<ul style="list-style-type: none"> <li>- Temporary planning permission; proposed to make permanent</li> </ul>
A54 Lakeview, Lakeside Rd, Ash Vale	N/a	<ul style="list-style-type: none"> <li>- Private provision</li> </ul>
A55 The Orchard, Puttenham Heath Road, Puttenham	Medium	<ul style="list-style-type: none"> <li>- Temporary planning permission; proposed to make permanent</li> <li>- Balancing of personal circumstances and harm to GB</li> </ul>
A56 Valley Park Equestrian, East Shalford Lane, Shalford	High	<ul style="list-style-type: none"> <li>- Temporary planning permission; proposed to make permanent</li> </ul>
A57 The Paddocks, Rose Lane, Ripley	Medium	<ul style="list-style-type: none"> <li>- Temporary planning permission; proposed to make permanent</li> <li>- Balancing of personal circumstances and harm to GB</li> </ul>
A44 Land west of Winds Ridge and Send Hill, Send	Low	

*Commentary on other policies*

- 10.9.10 Policy H1 (Homes for all) addresses issues under a number of sub-headings. Under four of these sub-headings quite specific requirements are established:
- Specialist housing - “We will support the provision of well-designed specialist forms of accommodation in appropriate sustainable locations, taking into account local housing needs.” It is also noted that there is now set to be a requirement for a proportion of accessible, adaptable and wheelchair accessible homes.
  - Students - “We expect 60 per cent of the University of Surrey eligible student population (full time equivalent) to be provided with student bedspaces and accommodation on campus.”
  - Houses in multiple occupation - “Proposals for houses in multiple occupation that require planning permission will be supported only where the balance of housing types and character of the immediate locality would not be adversely affected and there is sufficient amenity space available.”
  - Travellers - The supporting text explains that: “We require traveller accommodation within development sites of 500 homes or more to help create sustainable, mixed communities with suitable accommodation for all.”
- 10.9.11 In response to the 2016 proposed submission version of Policy H1, Enterprise M3 Local Enterprise Partnership (LEP) stated –
- “Enterprise M3 is therefore supportive of policy H2, which provides for 40% affordable housing to be accommodated on sites of five or more homes, or in excess of 0.17ha in size. However, there is the potential for this level of affordable housing provision to render some sites unviable, especially in difficult market conditions which may be exacerbated by the Brexit result. We are therefore supportive of... the Council following a cascade mechanism to assist in the delivery of housing schemes should viability become an issue during the development process. Enterprise M3 also welcomes the proposal within policy H2, which makes reference to Guildford Borough Council providing and managing affordable homes themselves, as well as reference... to the allocation of self build plots within strategic housing development sites to help meet demand for new housing and increase supply. This provides for flexibility in delivering new homes where they are needed most and will encourage diversity within the housing market.”*
- 10.9.12 Policy H2 (Affordable homes) establishes that affordable homes should be provided: on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes; and at least 40 per cent of the homes on these sites must be affordable homes. Land values and property prices are generally high across the borough, and viability evidence shows that the vast majority of developments in most locations in the borough are viable providing an affordable housing contribution of 40 per cent.
- 10.9.13 Where developers demonstrate that providing the amount of affordable housing required by policy would not be economically viable, the Council will consider the potential to: 1) vary the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; 2) reduce the overall number of affordable homes. In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost; and developments that seek to avoid the requirements of policy by failing to make most efficient use of land or by artificially subdividing land into smaller sites will not be permitted.



*Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.9.14 The plan sets out to meet the objectively assessed housing need (OAHN) figure identified for the borough by the SHMA, and as such **significant positive effects** are predicted. However, the decision has been taken not to deliver a higher level of growth in order to address under-supply at the housing market area (HMA) scale (arising from Woking). There is also some uncertainty regarding the housing trajectory, and specifically the supply of housing in the early part of the plan period. Finally, in respect of the policy approach, it is clear that a tailored approach is set to be implemented in respect of affordable housing, student accommodation, specialist accommodation (for example, for older people), travellers and houses in multiple occupation.

**Targeted changes**

- 10.9.15 The proposal is to provide for a reduced housing quantum; however, as is this is in response to a lowered OAHN figure, it is not possible to conclude that this is a 'negative' in terms of 'Housing' objectives. The proposed reduction in the quantum of homes provided for in the plan period is in fact greater than the reduction in the OAHN figure, but this again is does not indicate a 'negative'. This is because a reduced buffer can be justified by the decision to reduce the expected scale of development at two strategic sites – Blackwell Farm and Gosden Hill Farm – in the plan period (with both sites instead assumed to deliver 300 homes beyond the plan period). Site specific policy for these sites does not require that 300 homes is delivered beyond the plan period, but the expectation – for the purposes of calculating housing provision – is that they will. This is a positive approach, from a 'Housing' perspective.
- 10.9.16 Notable changes are made to the approach to providing for the Traveller Community, although it remains the case that the intention is to provide for objectively assessed needs in full. A targeted change is proposed Policy S2 (Borough Wide Strategy), explaining that the proposal is to provide for the needs of both those who meet the national definition, as established by the Planning Policy for Traveller Sites,<sup>48</sup> and those who do not, but nonetheless have specific accommodation needs that should be provided for under the Equalities Act. Also, text establishing the criteria that must be met for sites to be deemed suitable for pitches / plots has been removed from Policy H1 (Homes for all) and instead added to the supporting text. This should result in appropriate flexibility, recognising that the Gypsy and Traveller Federation objected to the 2016 plan as a requirement for sites to be in easy walking distance of a settlement may hinder delivery, as such sites "will rarely if ever be acceptable to local communities".
- 10.9.17 Finally, it is noted that loss of the Normandy/Flexford strategic allocation results in the potential to deliver a nursing or residential care home (C2) with approximately 60 beds, as was proposed in 2016.

<sup>48</sup> See <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

## 10.10 Land

### The Proposed Submission Plan 2017

#### *Commentary on the spatial strategy*

- 10.10.1 The 'Agricultural Land spatial Classification Provisional (England)' dataset, available at [magic.gov.uk](http://magic.gov.uk), shows the majority of agricultural land in the borough to be 'grade 3', with some small patches of higher quality 'grade 2' land and notable areas of lower quality 'grade 4' and 'non-agricultural' land (e.g. areas associated with heathland commons, and the North Downs escarpment, are classified as 'non-agricultural'). However, it is important to be clear that this data-set is of a very low resolution (e.g. some relatively large villages are not even recognised as 'urban' on the map), and hence is not suitable for differentiating sites / site-specific alternatives at the borough-scale. Also, the dataset does not distinguish between 'grade 3a' and 'grade 3b', which is a notable omission given that the NPPF classifies 'best and most versatile' (BMV) agricultural land as that which is either grade 1, grade 2 or grade 3a.
- 10.10.2 The most reliable dataset is the 'Post 1988 Agricultural Land Classification (England) dataset, also available at [magic.gov.uk](http://magic.gov.uk), which is suitable for differentiating sites at the borough-scale, and does distinguish between grade 3a and grade 3. However, because surveying land using the 'post 1988' criteria involves fieldwork, the data is very patchy. Within Guildford Borough the main area of land that has been surveyed is to the west of Guildford (including Blackwell Farm), finding primarily grade 3b and limited grade 3a and grade 2.
- 10.10.3 Also, there is the potential to undertake desk-top survey of specific sites, thereby reaching a conclusion on agricultural land quality (distinguishing between grade 3a and 3b), but without the certainty that comes from field survey. The Council commissioned such a desk-top study of all proposed major greenfield sites in 2016, which served to highlight the potential for greater loss of grade 2 land than the nationally available dataset would suggest.
- 10.10.4 Ultimately, the conclusion is that the spatial strategy will result in **significant loss of best and most versatile (BMV) land**. However, it is noted that a number of sites will avoid BMV, notably: Blackwell Farm is predominantly 3b. Also, whilst the Wisley Airfield includes agricultural land that is primarily 3a and 3b, the site also includes c.30ha of hard-standing.

#### *Commentary on other policies*

- 10.10.5 Policy E5 (Rural economy) states: "Agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account."

#### *Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.10.6 The plan will result in significant loss of best and most versatile agricultural land, hence **significant negative effects** are predicted, although it is noted that the plan seeks to maximise brownfield development.

#### **Targeted changes**

- 10.10.7 The precise net implications of proposed changes to the spatial strategy are not clear. The proposal is to remove A46 (Land to the south of Normandy and north of Flexford), which would have involved the loss of some grade 3a land, but to add A58 (Land around Burnt Common warehouse, London Road, Send), which may include some grade 3a land.

## 10.11 Landscape

### The Proposed Submission Plan 2017

#### *Commentary on the spatial strategy*

- 10.11.1 Landscape is a major constraint to growth in Guildford Borough. There is a need to avoid greenfield development within the AONB (which covers the southern half of the borough) and avoid loss of Green Belt (which covers 89 per cent of the borough), in particular Green Belt that is high sensitivity (i.e. contributes to the nationally established Green Belt purposes).<sup>49</sup> Also, there is land adjacent to the AONB that is currently designated as an Area of Great Landscape Value (AGLV), and which is also a significant constraint (particularly given a commitment by Natural England to undertake an AONB boundary review, and given an independent study that has identified candidate sites within Guildford to add to the AONB).
- 10.11.2 Also, there is a need to recognise that all landscapes within Guildford will have an identified character, with varying degrees of importance and sensitivity. A landscape character assessment (LCA) study does examine all landscape parcels in Guildford; however, there is limited potential to draw upon it for the purposes of this current appraisal. The LCA to a large extent seeks to guide the direction of future change or evolution through development or management, by indicating sensitivities that should be considered, and providing the most positive opportunities for change and minimising negative impact.
- 10.11.3 The first point to note is that the spatial strategy will impact upon **AGLV and AONB**; however, efforts have been made to limit impacts as far as possible. Notably, the extent of Blackwell Farm has been reduced since the 2014 Draft Plan proposal, in that the site now only intersects the AGLV to a very small extent (albeit development will necessitate widening of an access road through AGLV and AONB). Also, the decision has been taken not to maximise growth around Ash and Tongham and around the Guildford urban area (Clandon Golf), despite these being sustainable locations in certain respects (with Ash and Tongham being within the Countryside Beyond the Green Belt, CBGB), partly because of a desire to conserve AGLV and the setting of the AONB.
- 10.11.4 With regards to **Green Belt**, the point to note is that greater weight is now being applied to sensitivity than was the case in 2014, and indeed than was the case in 2016 (when the Proposed Submission Plan included a large allocation at Normandy/Flexford, comprising red-rated Green Belt). The current strategy involves very limited loss of red-rated Green Belt, but significant loss of amber-rated Green Belt (primarily around the Guildford urban area and at the Wisley Airfield new settlement (i.e. higher order locations), but also around Send Marsh / Burnt Common (i.e. a village).
- 10.11.5 The proposed approach to growth around **Ash and Tongham** is also heavily influenced by the desire to retain the separate identity of Ash Green, i.e. prevent the village merging into the Ash and Tongham urban area. A targeted approach is set to be followed, which involves adding some land to the Green Belt (despite not all of the land having been assessed as contributing fully to Green Belt purposes). It is also the case that the major development allocation (Policy A29: Land to the south and east of Ash and Tongham) includes detailed policy to ensure that landscape/character objectives are realised: "Development... to have recognition of the historic location of Ash Green village... Whilst this land is now proposed to be included within the Ash and Tongham urban area, proposals for the land west of this road should respect the historical context of this area. This should include the provision of a green buffer..."

<sup>49</sup> Green Belt is not technically a landscape designation. However, given the extent of Green Belt in Guildford (i.e. the choice is primarily between Green Belt sites, as opposed to Green Belt sites versus sites within the countryside beyond the Green Belt), and given the fact that all Green Belt parcels have been classified according to sensitivity (i.e. a parcel is sensitive where it contributes to Green Belt purposes), it is possible and helpful to take account of Green Belt sensitivity.

- 10.11.6 With regards to non-designated landscapes, another concern with the spatial strategy is the proposal to extend **Send Marsh / Burnt Common** to the west, thereby potentially creating a risk of coalescence with Guildford (which is extending to the east, through the Gosden Hill allocation). A landscape gap will remain, and site allocation policy refers to the importance of retaining a green buffer within the sites; however, there is conceivably some risk of coalescence in the long term. The fact that Send sits in the gap between Guildford and Woking is also noted; however, the River Wey ensures separation.
- 10.11.7 The other important step that has been taken is to reevaluate villages and previously developed sites that are currently washed over by the Green Belt, inseting them from the Green Belt where they do not make an important contribution to the openness of the Green Belt (in-line with national policy). Focusing on **major previously developed sites** to be inset from the Green Belt, whilst a number are set to be inset the majority are not proposed to be redeveloped for housing. Instead, the process of inseting will merely enable greater flexibility for appropriate intensification or development for the uses that already exist on site. One site that is proposed to be inset and redeveloped for housing is the Surrey Police Headquarters at Mount Browne, which is sensitive given its location within the AONB. In this instance, site-specific policy will require “positive benefit in terms of landscape and townscape character and local distinctiveness.” Similarly, the University of Law site is sensitive on account of its location within the AONB and its elevation, albeit it is a small site at 0.7 ha. In this instance, the site is understood to be screened by vegetation, and policy will require: “Significant regard to height of buildings...”
- Commentary on other policies*
- 10.11.8 Policy P1 (Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value) seeks to conserve the AONB, in-line with national policy. It also deals with the Area of Great Landscape Value (AGLV), which predominantly abuts the AONB, stating that: “Proposals within the AGLV will be required to demonstrate that they would not harm the setting of the AONB or the distinctive character of the AGLV itself.” Whilst there is a policy presumption against major development, the supporting text explains that the AONB is a “living landscape, which constantly changes across seasons and in response to the many social and economic forces placed upon it.”
- 10.11.9 Policy P2 (Green Belt) clarifies national policy in respect of protecting the Metropolitan Green Belt. Importantly, the policy clarifies those villages for which it has been possible, given built form, to establish a settlement boundary within which limited infilling would be appropriate (in-line with national policy). Within villages with no settlement boundary, which are listed, applications for limited infilling will need to be considered on a case-by-case basis, i.e. a judgement on the ground will need to be made regarding whether the site in question is within the village. The supporting text goes on to state that: “For the purposes of this policy, limited infilling is considered to be the development of a small gap in an otherwise continuous built-up frontage, or the small-scale redevelopment of existing properties within such a frontage. It also includes infilling of small gaps within built development. It should be appropriate to the scale of the locality and not have an adverse impact on the character of the countryside....”
- 10.11.10 Policy P3 (Countryside) deals specifically with the countryside near Ash and Tongham, recognising that, whilst its position outside the Green Belt means that it is a sequentially preferable location for growth in policy terms, there is a need to: “protect its intrinsic character and preserve... the separate identities of Ash and Tongham”; and also recognise that: “This area of countryside provides a green corridor and tranquil setting with considerable biodiversity and recreation value. The River Blackwater marks the borough and county boundary and maintains the rural corridor between Surrey and Hampshire.” Most notably, the policy requires that any proposal: “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot.”

- 10.11.11 Policy D4 (Character and Design of new development) deals specifically with the areas where, in addition to the site allocations, it is anticipated that a range of other development sites will continue to come forward through redevelopment, infilling or conversions (whether sites identified in the LAA, or sites that will unexpectedly come forward). Notably, policy requires that: “proposals... within villages will have particular regard to: the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape; important views of the village from the surrounding landscape; [and] views within the village of local landmarks.” This policy adds an appropriate degree of rigour, recognising that fifteen villages will - through the plan - be inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate.

*Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.11.12 The plan will result in limited impacts to the nationally important AONB, the sub-regionally important AGLV and Green Belt identified as more sensitive by the Green Belt and Countryside Study, despite these constraints being widespread. Also, a notably proactive approach is being taken around the Ash and Tongham area, i.e. within the 2% of the borough that is currently Countryside Beyond the Green Belt (CBGB). On balance, this approach to the growth within the CBGB is supported from a landscape perspective, albeit it is recognised that a decision not to maximise growth here leads to increased pressure on the Green Belt.
- 10.11.13 Finally, it is noted that site-specific policy is set to respond to a number of issues and opportunities, most notably around Ash and Tongham (where masterplanning and layout will be of critical importance, if the separate village identity of Ash Green is to be retained) and at the two previously developed sites in the AONB that are proposed for redevelopment.
- 10.11.14 Given the extent to which landscape has been applied as a constraint, and recognising that the baseline situation could be one whereby development will come forward in an unplanned way, it is appropriate to conclude **significant positive effects**.

**Targeted changes**

- 10.11.15 The following proposed changes to the spatial strategy are particularly notable, from a landscape perspective –
- Remove A46 (Land to the south of Normandy and north of Flexford), which was the only site in the 2016 Proposed Submission Plan set to result in the loss of a significant area of ‘red-rated’ Green Belt.
  - Add A58 (Land around Burnt Common warehouse, London Road, Send) – which comprises amber rated Green Belt, and potentially contributes to the landscape gap that exists between Send Marsh / Burnt Common and Guildford (recognising that this gap is set to be eroded somewhat by the proposed Gosden Hill scheme).



## 10.12 Poverty and social exclusion

### The Proposed Submission Plan 2017

#### *Commentary on the spatial strategy*

- 10.12.1 Whilst the Index of Multiple Deprivation (IMD) dataset shows there to be some **areas of relative deprivation** within Guildford, particularly to the west (Westborough / Park Barn) and north (Bellfields / Slyfield) of the Guildford urban area, only one 'output area' (Park Barn / Westborough) is within the bottom 20% of output areas nationally. As discussed above, under the 'Health' topic heading...

With regards to Westborough / Park Barn, the Blackwell Farm extension being to the southwest may have some bearing, given that Guildford West (Park Barn) station will benefit the local area. Also, it is noted that Policy A20 (Former Pond Meadow School, Pond Meadow) allocates a site in Park Barn for a new community hub. With regards to Bellfields / Slyfield it may be that the Slyfield Area Regeneration Project (SARP) will lead to some benefits. The 1,500 home scheme will deliver some new employment and community uses, and improve the local environment with increased access to the river...

- 10.12.2 It is also appropriate to consider the provision that is being made for **Travellers**, given the identified issue of sites (pitches/plots) having in the past tended to be poorly located, in the sense that there is poor access to services, facilities, education etc., with implications for poverty and social inclusion. As has been discussed above, under 'Housing', identified needs are set to be met within borough, and in respect of the spatial strategy the decision to integrate pitches or plots as part of all strategic allocations is supported, as is the recognition that family/personal circumstances can (when balanced alongside other issues) lead to the exceptional circumstances necessary to allow sites in the Green Belt.

#### *Commentary on other policies*

- 10.12.3 A number of relevant policies have been discussed above, particularly under the 'Communities' and 'Housing' headings.

#### *Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.12.4 The plan does not have a major focus on addressing poverty and social exclusion, although a proactive approach is being taken in respect of planning for the needs of Travellers. **Significant effects are not predicted.**

#### *Targeted changes*

- 10.12.5 See discussion above, under 'Housing' in relation to planning for the Traveller Community.

## 10.13 Previously developed land

### The Proposed Submission Plan 2017

#### *Commentary on the spatial strategy*

- 10.13.1 It is difficult to comment on the merits of the proposed strategy. Whilst there could conceivably be an increased focus on previously developed land, leading to reduced loss of greenfield land, the preferred approach is quite firmly justified. In particular, as has been discussed above, it is not possible to allocate certain sites within Guildford town centre for redevelopment ahead of flood risk mitigation solutions having been formulated and agreed.

#### *Commentary on other policies*

- 10.13.2 Policy D4 (Character and design of new development) deals with density, stating a requirement: “to make the most efficient use of the land whilst responding to local character and context”.

#### *Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.13.3 It is difficult to comment on the merits of the proposed strategy. Whilst there could conceivably be an increased focus on previously developed land, leading to reduced loss of greenfield land, the preferred approach is quite firmly justified. In particular, as has been discussed above, it is not possible to allocate certain sites within Guildford town centre for redevelopment ahead of flood risk mitigation solutions having been formulated and agreed. **Significant effects are not predicted.**

#### *Targeted changes*

- 10.13.4 The proposal to remove brownfield allocations is noted: A4 (Telephone Exchange, Leapale Road, Guildford), A34 (Broadford Business Park, Shalford) and A36 (Hotel, Guildford Road, East Horsley). This is potentially non-ideal; however, these changes are made for clear-cut planning reasons. The former site is no longer available, and the latter two sites represent an efficient use of land in their current use. The proposal is also to increase the number of homes delivered at another brownfield site: A6 (North Street redevelopment, Guildford).

### **10.14 Rural economy**

#### *The Proposed Submission Plan 2017*

#### *Commentary on the spatial strategy*

- 10.14.1 Wisley Airfield stands out as a rural location (away from a village); however, it is difficult to conclude how it might impact on the rural economy. On the one hand, employment space, jobs and a new local centre will be created, but on the other hand traffic on rural roads can impact on rural businesses. Wisley Airfield is surrounded by a number of small villages without a local centre that will benefit from access to a new local centre; however, it does not seem that any of the surrounding villages are particularly isolated (e.g. Ockham has access to Ripley District Centre and East Horsley District Centre). The hamlets to the east of Wisley Airfield are perhaps most ‘rural’.

#### *Commentary on other policies*

- 10.14.2 Policy E5 (Rural economy) aims to encourage rural enterprise, to the extent to which this is possible through the planning system. As stated in the supporting text, there is a need to: “where feasible, contribute to projects promoted by the Surrey Countryside Rural Economic Forum and the Surrey Hills Board... work with our partners the Guildford Business Forum Rural Group... support rural and agricultural initiatives that improve local services and facilities and contribute to the rural economy... [and] balance the creation of new business opportunities with the needs of the farming industry.”

N.B. The 2016 SA Report **recommended** that added emphasis might be given to traditional rural businesses related to farming. As such, it is notable that the policy now states: “Agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account.”

- 10.14.3 Policy E6 (The leisure and visitor experience) supports: “sustainable rural tourism and leisure developments that benefit businesses, communities and visitors in rural areas as long as they respect the size, character and function of their setting and comply with national green belt policy.” As stated within the supporting text: “*Visitor related development by its nature is often located in sensitive areas and its benefits need to be carefully balanced against the need to protect our valuable countryside and heritage assets from overcrowding and degradation.*”

*Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.14.4 Perhaps the most notable effects will arise as a result of Policy E5 (Rural economy), which aims to encourage rural enterprise, to the extent to which it is possible through the planning system. It is not clear that the spatial strategy will have notable effects, although it is noted that Wisley Airfield (proposed 2,000 home mixed use development) is in a relatively rural location. **Significant effects are not predicted.**

Targeted changes

- 10.14.5 It is not clear that the proposed Targeted Changes have implications for the rural economy. Potentially most notable is the change to Policy E5 (Rural economy).

## 10.15 Safety and security

The Proposed Submission Plan 2017

*Commentary on the spatial strategy*

- 10.15.1 The spatial strategy is high level and primarily concerned with creating new communities rather than redeveloping urban areas / regenerating existing communities, and as such will have limited implications for safety and security. Whilst it is fair to say that new communities will enhance the vitality of adjacent/nearby communities, it is not possible to draw conclusions in relation to safety/security. Another issue locally is pedestrian, cyclist and road traffic; however, it is again not possible to draw strong conclusions (see additional discussion below, under ‘Transport’).

*Commentary on other policies*

- 10.15.2 A number of thematic policies have positive implications for safety / feeling of safety:
- Policy ID2 (Supporting the Department for Transport’s “Road Investment Strategy”) states that: Guildford Borough Council is committed to working with Highways England to facilitate major, long-term improvements to the A3 trunk road and M25 motorway in terms of both capacity and safety...
  - The supporting text to Policy H1 (Homes for all) states that: “New traveller sites should have adequate utility services and amenity space, safe turning space and parking.”
  - Policy E7 (Guildford town centre) states that: “By 2034, Guildford town centre will have... more varied uses during the evening and night-time, including along the riverside, with residents and visitors feeling *safe*.”
  - Policy D1 (Place shaping) states that: “Residential developments of 25 or more dwellings must... create places that are easy to get to and through, foster active lifestyles, are easy to understand and navigate, and feel *safe* during the day and night, and provide convenient and *safe* routes through the development and to nearby areas for pedestrians and cyclists.”
  - Policy ID3 (Sustainable transport for new developments) includes a number of references to safety, including the high-level statement that: “We will expect that new developments will contribute to the delivery of an integrated, accessible and *safe* transport system, balanced in favour of sustainable transport modes, to facilitate sustainable development.”

- 10.15.3 Also, there are a number of references to safety within site-specific policy, e.g. Policy A35 (Land at former Wisley airfield, Ockham) will require: “An off site cycle network to key destinations including Effingham Junction railway station, Horsley railway station/Station Parade, Ripley and Byfleet to be provided with improvements to a level that would be attractive and *safe* for the average cyclist.”

*Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.15.4 Thematic policy and site-specific policy established through the plan will have a major influence on masterplanning, layout, landscaping and design, which in turn will have implications for safety and perceptions of safety. The plan performs well; however, **significant effects are not predicted**.

Targeted changes

- 10.15.5 It is not clear that the proposed Targeted Changes have implications for the rural economy.

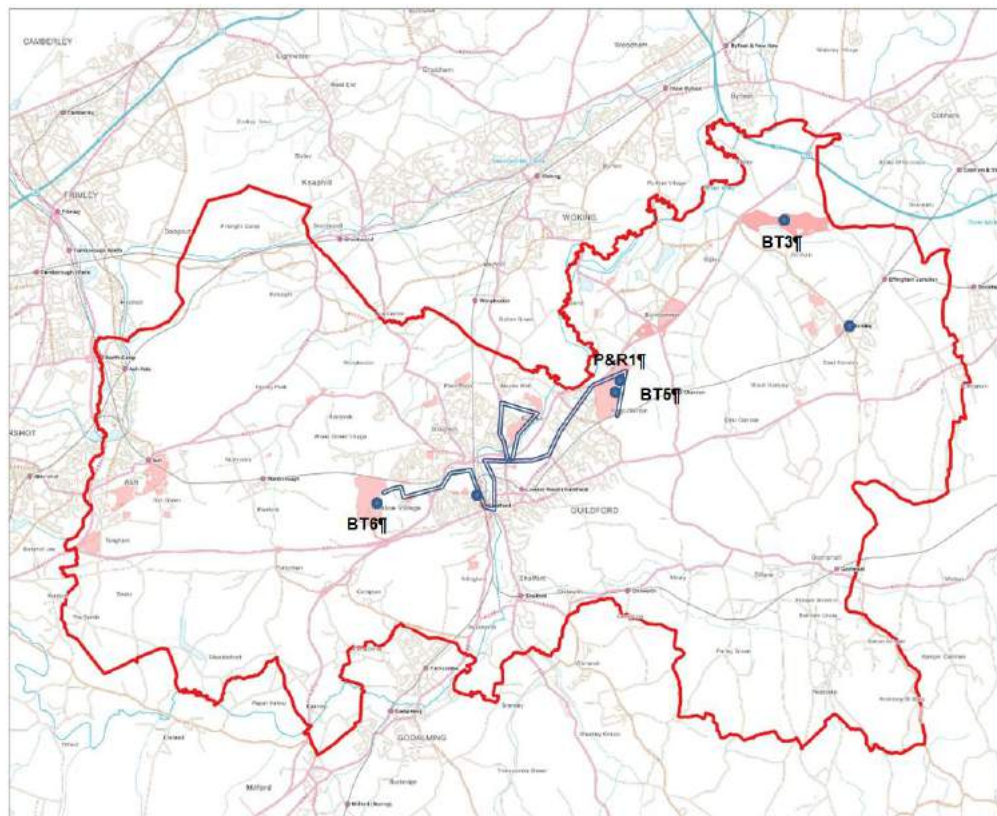
**10.16 Transport**

The Proposed Submission Plan 2017

*Commentary on the spatial strategy*

- 10.16.1 Traffic is a key issue locally, both on strategic and local roads (where a range of ‘hotspots’ have been identified); hence the spatial strategy must be scrutinised in terms of the potential to support modal shift (i.e. walking cycling and use of public transport, rather than reliance on the private car), minimise worsened traffic along key routes and at key junctions and deliver required upgrades to transport infrastructure.
- 10.16.2 A faster **rate of growth** than previously experienced in Guildford borough leads to issues, given that the borough is a constrained location (certainly in the regional context, and potentially in the sub-regional context; albeit it is recognised that parts of Waverley - including the Dunsfold Aerodrome site that is under consideration for significant growth - are not well connected). Concerns also relate to past experiences, which indicate that transport infrastructure upgrades do not always materialise as planned, albeit past growth has been ad hoc rather than plan-led, and there was no Community Infrastructure Levy in place.
- 10.16.3 However, coordinated delivery of a number of the major sites will act to support the achievement of transport objectives - most notably urban extensions to Guildford at Blackwell Farm and Gosden Hill, which will support delivery of two new rail stations and more generally a **Sustainable Movement Corridor** through Guildford (see Figure 10.1). The corridor will also serve SARP and both of the University of Surrey’s campuses. The Sustainable Movement Corridor will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists, with the aim that journeys will be rapid, reliable and safe.

Figure 10.1: Key components of the Sustainable Movement Corridor<sup>50</sup>



- 10.16.4 Most **other growth locations** also perform well, recognising that growth at the Horsleys will ensure residents have good access to a rail station, and the new community at Send Marsh / Burnt Common will have good opportunity to make use of the new Park and Ride facility, set to be delivered as part of the Gosden Hill scheme. However, there is some uncertainty regarding the possibility of in combination effects from housing and employment growth in the Send area. It is noted that the 2016 Strategic Highway Assessment found: *“There are several instances of roads showing unexpected increases... The increase on Polesden Lane at Send Marsh appears to be due to the traffic calming measures put in place to complement the new A3 slips at Burntcommon. Given that stretches of it are narrow and only allow vehicles to pass in a single direction at one time, it is unlikely that such increases will materialise. But it may be that this road will need to be monitored if the slips are implemented and traffic calming introduced if required.”* Since this statement the decision has been made to direct additional growth to Send, which serves to highlight the importance of monitoring. It is **recommended** that site specific policy refers to the importance of monitoring impacts to the local road network in the Send area.
- 10.16.5 **Wisley Airfield** does not perform well as a growth location, given its relatively isolated location; however, the scale of the scheme would enable good potential to provide a high quality bus service in perpetuity and deliver some cycle route improvements to important destinations. There is also the potential for this scheme to worsen traffic conditions on the Strategic Road Network which could affect road safety. However, there are planned upgrade works in the vicinity of the site, and policy is proposed to ensure phasing of housing in line with infrastructure. Specifically, the Department of Transport’s Road Investment Strategy (RIS) for the 2015/16 – 2019/20 Road Period 1 includes a long term funding commitment to provide additional capacity at M25 Junctions 10-16 and M25 Junction 10/A3 Wisley interchange.

<sup>50</sup> See <http://www.guildford.gov.uk/newlocalplan/transport>



*Commentary on other policies*

- 10.16.6 Policy ID1 (Infrastructure and delivery) seeks to ensure the timely provision of suitable, adequate infrastructure recognising that historically infrastructure provision and upgrading has not always kept pace with the growth of population, employment and transport demands, and in parts of the borough some infrastructure is currently at or near to capacity, or of poor quality. The policy is clear that: “the delivery of development may need to be phased to reflect the delivery of infrastructure.” The Infrastructure Delivery Plan that supports the Plan focuses on a range of types of infrastructure, including Strategic Road Network, Local Road Network, park and ride, bus facilities and bus priority, cycling, walking, rail.
- 10.16.7 Policy ID2 (Supporting the Department for Transport’s ‘Road Investment Strategy’) reflects the critical importance of implementing the three Road Investment Strategy (RIS) schemes<sup>51</sup> during the Plan period. Specifically, the policy requires that developers of proposal sites close to the A3 and M25, and strategic sites, work closely with Highways England to ensure that their layout and access arrangement(s) are consistent with Highways England’s emerging schemes.
- 10.16.8 Policy ID3 (Sustainable transport for new developments) seeks to complement the spatial strategy, by promoting the use of sustainable transport modes and improvements to the transport network that will mitigate development. The policy refers to a range of measures, and the supporting text helpfully summarises that: “Measures designed to encourage people to make sustainable travel choices... can include car clubs, car sharing, facilities for electric charging plug-in points and other low and ultra-low emission vehicles, encouraging the accelerated uptake of cleaner fuels and technologies resulting in carbon and vehicle emission reductions, the provision of cycle infrastructure, pedestrian wayfinding and cycle parking, including for adult tricycles which can be suitable for those with disabilities and older people concerned about their balance, and the marketing and promotion of sustainable travel choices, for instance the provision of resident travel information packs.”

*Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.16.9 Whilst transport/traffic constraints are widespread across Guildford Borough, it is apparent that the spatial strategy has been developed in order to reflect variations in constraint and opportunity, most notably through focusing growth at locations along a Sustainable Movement Corridor in the urban area of Guildford, and at locations in proximity to a rail station. Policy commitments regarding the phasing of infrastructure are also of critical importance.
- 10.16.10 A lower growth strategy is proposed than was the case in 2016, when the Strategic Highways Assessment concluded: “*The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network...*” As such, **significant negative effects are not predicted**. However, there could be a risk that the change in distribution leads to localised traffic over and above that identified through the 2016 modelling work.

**Targeted changes**

- 10.16.11 There are a number of points to make -
- Removing A46 (Land to the south of Normandy and north of Flexford) reduces the proportion of new residents within walking distance of a train station.

<sup>51</sup> Within Guildford borough, three schemes have been identified in the RIS; Schemes with construction anticipated to commence in Road Period 1 (2015/16 to 2019/20): M25 Junctions 10-16 – upgrading the M25 between junction 10 (A3) and junction 16 (M40) through a mixture of enhancements, including hard shoulder running between junctions 15 and 16, as well as four-lane through junction running between junctions 10 and 12; M25 Junction 10/A3 Wisley interchange – improvement of the Wisley interchange to allow free-flowing movement in all directions, together with improvements to the neighbouring Painshill interchange on the A3 to improve safety and congestion across the two sites. Scheme with construction anticipated to commence in Road Period 2 (2020/21 to 2024/25); and A3 Guildford – improving the A3 in Guildford from the A320 to the Hogs Back junction with the A31, with associated safety improvements.

- A more conservative delivery profile for the strategic urban extensions around Guildford, namely Blackwell Farm and Gosden Hill Farm, is supported from a perspective of seeking to ensure infrastructure delivery ahead of housing.
- Intensifying growth in the vicinity of Send – most notably through the addition of a new employment allocation (A58 Land around Burnt Common warehouse) – could potentially create a risk of localised traffic issues. It is notable that the employment floorspace could be expanded beyond the 7,000m<sup>2</sup> figure proposed for this plan period.
- The proposal is to allocate land for a new rail station at Guildford West (Park Barn). A new rail station at Guildford West was previously included in Appendix C (Infrastructure Schedule), but its allocation aims to aid clarity and certainty.

## 10.17 Waste

### The Proposed Submission Plan 2017

#### *Commentary on the spatial strategy*

10.17.1 The spatial strategy is not likely to have a significant bearing on the achievement of waste objectives. It would be possible to manage waste sustainably under any reasonably foreseeable scenario. Whilst there are existing or proposed waste uses at two site allocations (SARP and Wisley Airfield) it is not thought that there is a direct conflict between housing objectives and waste management objectives.

10.17.2 The County Council has raised concerns regarding the potential for allocation of the Wisley Airfield site to conflict with the delivery of a waste management facility. The facility is an allocation within the existing Surrey Waste Management Plan, and has planning permission; however, the site promoter is now intending not to implement that planning permission. The Surrey Waste Management Plan is currently being reviewed.

#### *Commentary on other policies*

10.17.3 Policy D2 (Sustainable design, construction and energy) states that: “Proposals for development are required to set out... how they will deliver... incorporation of a proportion of recycled and/or secondary aggregates [and] waste minimisation and reusing material derived from excavation and demolition.” The policy also states that: “... the energy *and* waste hierarchies should be followed except where it can be demonstrated that greater sustainability can be achieved by utilising measures further down the hierarchy.”

#### *Appraisal of the Proposed Submission Plan 2017 as a whole*

10.17.4 The spatial strategy has limited or no implications for sustainable waste management. It should be possible to achieve good waste management as part of all development schemes, and Policy D2 sets out to ensure that opportunities are realised. The plan performs well; however, **significant effects are not predicted**.

#### Targeted changes

10.17.5 It is not clear that the proposed Targeted Changes have implications for waste management.

## 10.18 Water quality and resources

### The Proposed Submission Plan 2017

#### *Commentary on the spatial strategy*

- 10.18.1 In-line with the objectives of the European Water Framework Directive (WFD) there is a need to ensure that development does not reduce the quality of, or otherwise place pressure on, the water environment. However, the spatial strategy is not likely to have a significant bearing.
- With regards to the risk of direct pollution, it is assumed that polluting land uses allocated through the plan (industry and a cemetery) have taken account of risk to groundwater. N.B. the 2016 SA Report **recommended** that site-specific policy might be reviewed, to ensure that there would not be benefit to requiring specific mitigation measures. It is assumed that this recommendation is no longer outstanding, given that the Environment Agency has now had the opportunity to review proposals in detail.
- 10.18.2 With regards to the risk of indirect pollution - i.e. the risk of capacity breaches at wastewater treatment plants, leading to pollution - no *major* waste water infrastructure 'pinch points' are known of, albeit Thames Water have stated (through representations) that: "Water treatment and wastewater/sewage treatment capacity maybe a constraint in some catchments within the Guildford Borough area. As the Local Plan is finalised we will be reviewing which of our treatment sites need upgrades to accommodate the growth..." Thames Water's consultation response from 2014 was along similar lines -
- "We have concerns regarding Wastewater Services in relation to this site... Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure... It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner..."*
- 10.18.3 A Water Quality Assessment study has recently been completed, which includes a focus on Wastewater Treatment Works (WwTW) capacity see Figures A and B. Wastewater treatment in the borough is provided via WwTWs operated and maintained by Thames Water Utilities Limited (TWUL), ultimately discharging treated wastewater to nearby fluvial watercourses. Wastewater from the borough is treated at six WwTWs which fall in the Guildford's administrative boundary. The study concludes:
- 10.18.4 "The calculations of flow headroom capacity found that Ash Vale WwTW would not have sufficient headroom once all the growth within the WwTW catchment is accounted for. Ash Vale would exceed its maximum permitted DWF under their existing discharge permit. Additional headroom can be made available through an application by TWUL for a new or revised discharge permit from the Environment Agency."
- 10.18.5 Finally, it is noted that the quantum of growth at SARP in the plan period is expected to be approximately 1,000 homes, given the need to relocate the current Sewage Treatment Works, which is unlikely until some way into the plan period.

*Commentary on other policies*

- 10.18.6 Policy P4 (Flooding, flood Risk and groundwater protection zones) states that: “Development within Groundwater Source Protection Zones will only be permitted provided that it has no adverse impact on the quality of the groundwater source and it does not put at risk the ability to maintain a public water supply.” The supporting text then goes on to state that: “Proposals for polluting industries, cemeteries and other similar uses are unlikely to be appropriate in the borough’s identified Source Protection Zones.”
- 10.18.7 Policy D2 (Sustainable design, construction and energy) states that: “Proposals for development, including refurbishment, conversion and extensions to existing buildings, must set out in a sustainability statement how they will deliver... “the highest levels of energy and water efficiency that are achievable.” The supporting text goes on to reference a water efficiency standard for new buildings of 110 litres per occupant per day.
- 10.18.8 Policy ID4 (Green and blue infrastructure) states that: “Development proposals that are likely to have an impact on waterways, including the River Wey catchment, must demonstrate how they will support the implementation of the Water Framework Directive and have followed guidance from the Environment Agency and Natural England on implementation of the Wey Catchment Plan and flood risk management.”

*Appraisal of the Proposed Submission Plan 2017 as a whole*

- 10.18.9 On the basis of the evidence available it is difficult to envisage the spatial strategy having significant implications for the water environment / water resources, and it should be the case that the policy framework in place (including policy dedicated to the achievement of objectives for the River Wey catchment) will help to ensure the achievement of WFD objectives. **Significant effects are not predicted.**

*Targeted changes*

- 10.18.10 It is not clear that the proposed Targeted Changes have implications for water issues.

## 10.19 Conclusion

- 10.19.1 The appraisal finds the Proposed Submission Plan 2017 to perform well in terms of a number of sustainability objectives, with 'significant positive effects' predicted in terms of Communities, Economy and employment, Health, Housing and Landscape. These significant positive effects mostly relate to the proposal to meet objectively assessed needs, and in turn support community infrastructure upgrades. The positive conclusion reached for Landscape reflects an understanding that sensitive areas have been avoided as far as possible, and also an understanding that the baseline / 'no plan' scenario would likely involve housing growth coming forward in an unplanned way, potentially impacting more sensitive landscapes.
- 10.19.2 Significant negative effects are predicted only in terms of 'land', reflecting the loss of agricultural land, including land that is relatively high quality in the Guildford context. However, the plan is also inevitably associated with numerous more specific draw-backs, perhaps most notably in respect of biodiversity (e.g. Wisley Airfield will be in close proximity to an internationally important area of heathland, albeit mitigation is proposed) and transport (e.g. uncertainties regarding localised traffic impacts in the Send area have been highlighted).
- 10.19.3 Recommendations have been made throughout the SA process, with a view to improving the performance of the plan in terms of specific sustainability objectives. A number of recommendations have been addressed already within the plan, but the following recommendations remain outstanding at the current time:<sup>52</sup>
- Add detail to the policy for Wisley Airfield, to ensure that impacts to the SNCI are minimised.
  - Consider the risk of traffic congestion in the Send area.
  - Provide a policy mechanism to ensure that growth is maximised in Guildford town centre.
  - Supplement policy in respect of SARP, to more explicitly reflect regeneration priorities.
- 10.19.4 Also, with a view to improving the performance of the plan, the SA process has involved giving careful consideration to 'reasonable alternatives', most notably in relation to the spatial strategy. This matter is discussed in detail in Part 1 of this report.

### Cumulative effects

- 10.19.5 The SA process has included a focus on effects not just at the Guildford Borough scale, but at appropriate larger than local functional scales, most notably the West Surrey scale (i.e. Guildford, Woking and Waverley), which is known to be a functional Housing Market Area (HMA) and Functional Economic Market Area (FEMA). As part of this, there has been a need to recognise that the baseline situation is one whereby Woking and Waverley will be pursuing their own planning objectives, i.e. there is a need to recognise that the Guildford Local Plan will not be implemented in a vacuum, but rather will impact cumulatively.
- 10.19.6 Housing and economic growth matters have emerged as the key 'larger than local' consideration, and in respect of these two matters (only) the conclusion is that: whilst the plan performs well (see discussion of significant positive effects under the 'Housing' and 'Economy and employment' headings), there might be the potential to go further, i.e. provide for higher growth in order to more fully realise housing and economic objectives at the West Surrey scale (see discussion of higher growth spatial strategy options in Part 1 of this report).

### Conclusions on Targeted Changes

- 10.19.7 Targeted Changes have a range of implications, as discussed above under each of the sustainability topic headings; however, the effect of Targeted Changes is not to change any of the 'headline' conclusions reached in the 2016 SA Report. This is particularly because the proposal to meet objectively assessed needs is unaltered.

<sup>52</sup> It is a regulatory requirement that the SA Report must include recommendations, to be addressed subsequent to the consultation.



## PART 3: WHAT HAPPENS NEXT?

## 11 INTRODUCTION (TO PART 3)

- 11.1.1 The aim of this chapter is to explain next steps in the plan-making / SA process.

## 12 PLAN FINALISATION

- 12.1.1 Subsequent to the current ‘publication’ stage, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be ‘sound’. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).
- 12.1.2 If found to be ‘sound’ the plan will be formally adopted by the Council. At the time of Adoption an ‘SA Statement’ will be published that sets out (amongst other things) *‘the measures decided concerning monitoring’*.

## 13 MONITORING

- 13.1.1 At the current time, there is a need only to present ‘measures envisaged concerning monitoring’.
- 13.1.2 With regards to monitoring, the plan document states (Chapter 1) –
- “We need to assess whether this Local Plan is meeting its aims and objectives, and have appropriate mechanisms in place so that we can recognise if it is not and actions can be taken accordingly. [Hence] each policy in this document is accompanied by monitoring indicators.*
- Where policies are failing to deliver against the strategic objectives of this plan, necessary actions will be identified in our Annual Monitoring Report. Amongst other things, the Annual Monitoring Report will show the number of homes and amount of employment and retail space that have been delivered (on an annual basis) against our objectively assessed need.*
- We will review the Local Plan, if required... As part of a review, we will consider the proposed level of new homes and employment land...”*
- 13.1.3 **Table 13.1** lists a number of indicators that, it is suggested, are of particular importance from an SA perspective, given appraisal findings presented above.

*Table 13.1: Proposed monitoring indicators of particular importance, in light of appraisal findings*

Indicator	Comments
The number of new homes completed each year	There will be a need to ensure delivery in the early years of the plan period, given the needs that exist.
Delivery of different size and types of housing compared to the identified mix in the Strategic Housing Market Assessment	Ideally, delivery within different parts of the borough would be monitored.
Low and zero carbon decentralised energy networks	Whilst the proposed target is ‘increase in number’, a more ambitious approach would be to monitor the number of homes/businesses linked to a network.
Walking, cycling, bus and rail modal share for travel to work journey in Guildford borough	Ideally, achievement within different parts of the borough would be monitored.
Net gains in biodiversity provided by development	A definition of ‘net gains in biodiversity’ should be agreed, ideally with reference to species of conservation importance.

## APPENDIX I - REGULATORY REQUIREMENTS

As discussed in Chapter 2 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

Questions answered		As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the SA scope?	
		<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
Part 1	What has plan-making / SA involved up to this point?	<p>‘</p> <p>-</p>
Part 2	What are the SA findings at this current stage?	
Part 3	What happens next?	<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

Table B: Questions answered by this SA Report, in-line with regulatory requirements

## Schedule 2

## Interpretation of Schedule 2

### The report must include...

(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
(c) the environmental characteristics of areas likely to be significantly affected;
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
(i) a description of the measures envisaged concerning monitoring.

### The report must include...

An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What's the 'baseline'?</i>
Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues &amp; objectives?</i>
An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
The likely significant effects associated with the draft plan	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
A description of the measures envisaged concerning monitoring		i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

i.e. answer - What's the scope of the SA?

Whilst Tables A and B signpost broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met - see Table C.

*Table C: 'Checklist' of how (throughout the SA process) and where (within this report) regulatory requirements have been, are and will be met.*

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
	Chapter 3 ('What's the plan seeking to achieve') presents this information.
	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The Scoping Report was updated post consultation, and is available on the website.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA framework', and this is presented within Chapter 4 ('What's the scope of the SA') in a slightly updated form.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	Also, more detailed messages from the Scoping Report - i.e. messages established through context and baseline review - are presented (in an updated form) within
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'.</p> <p>The SA framework is presented within Chapter 4 ('What's the scope of the SA'). Also, messages from the context review are presented within appendix II.</p> <p>With regards to explaining "<i>how... considerations have been taken into account</i>" -</p> <ul style="list-style-type: none"> <li>• Chapters 5 explains how/why understanding of the issues that should be a focus of alternatives appraisal was refined in subsequent to earlier consultation/SA.</li> <li>• Chapters 6 explains how reasonable alternatives were established in-light of earlier consultation/ SA.</li> <li>• Chapter 8 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).</li> <li>• Chapter 10 summarises how findings and recommendations from the past draft plan appraisal have been taken into account.</li> </ul>



Regulatory requirement	Discussion of how requirement is met
	Chapter 13 presents measures envisaged concerning monitoring.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.

Regulatory requirement	Discussion of how requirement is met
<p>The SA Report must be published alongside the draft plan, in-line with the following regulations</p> <p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>An Interim SA Report, which essentially presented the information required of the SA Report, was published for consultation alongside the 'Draft Plan: Strategy and sites' consultation document in 2014, under Regulation 18 of the Local Planning Regulations.</p> <p>In 2016 the SA Report was published alongside the Proposed Submission Plan, under Regulation 19, so that representations might be made ahead of submission.</p> <p>At the current time, this SA Report Update is published alongside the Proposed Submission Plan, under Regulation 19, so that further representations might be made ahead of submission.</p>
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</p> <p>The Council took into account the Interim SA Report (2014), alongside consultation responses received, when finalising the Proposed Submission Plan for publication in 2016.</p> <p>The Council took into account the SA Report (2016), alongside representations received, when finalising the Targeted Changes for publication in 2017.</p> <p>Appraisal findings presented within this current SA Report Update will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when finalising the plan at Examination (i.e. taken into account by the Inspector, when considering the plan's soundness, and the need for any modifications).</p>

## APPENDIX II - CONTEXT AND BASELINE REVIEW

### Introduction

As discussed in Chapter 4 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' / 'baseline', analysis of key issues, and consultation. The aim of this appendix is to present a summary key issues emerging from context / baseline review.

### Overview

Guildford is the county town of Surrey, known for its historical features and picturesque town centre. Situated in the south west of the county and surrounded by Green Belt and countryside, the urban areas of Guildford, Ash and Tongham are home to many of the borough's residents, with further communities in village settlements. Guildford is within commuting distance from London and about 70 kilometres from the south coast.

Guildford is the second largest borough in the county in terms of area, covering approximately 270 km<sup>2</sup>. The borough's population has risen steadily from 93,000 in 1951 to 137,183 in 2011. The population is predicted to grow from 145,473 in 2015 to 167,126 by 2034 .

### Biodiversity

The primary constraint to growth is the Thames Basin Heaths Special Protection Area (SPA), which is an area of lowland heath covering over 8,000 hectares of land across Surrey, Berkshire and Hampshire. A strategic approach to protection of the SPA is agreed sub-regionally, through the Thames Basin Heaths SPA Delivery Framework.

Other areas are designated as nationally important Sites of Special Scientific Interest (SSSI) or locally important Sites of Nature Conservation Importance (SNCIs). Also, the Surrey Nature Partnership - the designated Local Nature Partnership for Surrey - is working with Surrey local authorities to set out an approach to conserving and enhancing the biodiversity of the county at a landscape scale. This approach identifies Biodiversity Opportunity Areas (BOAs) where there are concentrations of recognised sites of a particular type of habitat. BOAs represent areas where improved habitat management and efforts to restore and re-create priority habitats will be most effective in improving connectivity and reducing habitat fragmentation. The majority of the countryside within the borough of Guildford falls within a BOA.

Through consultation in 2016, the Surrey Wildlife Trust made the following statement -

*"Guildford Borough has arguably the clearest responsibility for the conservation of English and UK biodiversity of all Surrey's boroughs and districts, with a wealth of declining and nationally-restricted wildlife species under its charge."*

### Climate change

The NPPF identifies climate change as a key challenge for the planning system to address and requires it to assist in the movement towards a low carbon economy. The South East of England is likely to face significant challenges from a changing climate and changing weather patterns. The full range of expected climate change impacts are set out in publications from UK Climate Projections 2009 (UKCP09, to be reviewed in 2018) and from other national and international bodies. The Guildford Environmental Sustainability and Climate Change Study presents a summary from several sources.

32% of Guildford's carbon emissions come from homes, which indicates a need to support retrofitting of the existing building stock but also the importance of designing new buildings to the highest standard (recognising that opportunities for retrofitting are limited). There are also considerable opportunities associated with decentralised energy, i.e. energy that is produced near where it is used, rather than at a large plant further away and supplied through the national grid, with a view to achieving efficiencies.

## Communities

Guildford residents are largely healthy and enjoying well above average life expectancy. The workforce is generally well educated, highly skilled and well paid. The Index of Multiple Deprivation 2015 - which provides a measure of deprivation based on factors such as income, employment, health, education, housing and crime - ranks Guildford Borough amongst the least deprived 10% of boroughs in England.

The Surrey Strategic Partnership Plan reports that the County's children and young people achieve some of the best educational outcomes in the country. This is all schools – it is notable that Surrey has a disproportionately large proportion of children educated in independent schools (21%) compared to the rest of England (7%).

However, despite the borough's relative affluence, pockets of deprivation exist. For the purposes of the Index of Multiple Deprivation, the borough is divided into 84 smaller areas called lower super output areas (LSOAs). Whilst none of the borough's LSOA's fall within the most deprived 10% nationally, one is located in the top 20% and a further 14 areas are classified within the most deprived half of LSOAs.

The Council's Project Aspire aims to improve the lives of residents in the borough's least advantaged areas by working with partners, businesses and communities to deliver the changes local people wish to see. The project will initially focus on enhancing the quality of life and prospects of residents in north Guildford by encouraging these less advantaged communities to become more self-confident and self-reliant.

## Economy and employment

Guildford is a growth hub in the Surrey and M3 Corridor region, with one of the most competitive local economies in the country. Approximately 3.6% of working age adults in the borough are unemployed (as of Q3 2016) compared to 4.9% of working age adults nationally. Employment in Guildford borough increased by 4.7% from 2010-2015, reaching 95,000 jobs in 2015.

Guildford's economy is strong in areas that the government has announced are high priority growth areas for the UK including health and life sciences, space, digital and creative industries, and professional services. There is an emerging cluster of innovative industries, some based at the Surrey Research Park and the University of Surrey and others in the town centre. Sectoral growth rates suggest a broad-based recovery from the effects of the recession, although manufacturing employment has declined

The Employment Needs Assessment (ELNA, AECOM, 2017) found there to be 20 strategic employment sites within the borough accounting for approximately 172ha of employment land. In addition to these strategic sites a further 24 were identified accounting for a further 10ha of B Use Class employment land.

The Enterprise M3 Commercial Property Market Study, 2016 highlights that Guildford is a highly sought after office location. Future developments, such as the planned expansion of the University of Surrey will further enhance the appeal of Guildford as a location for inward investment. The challenge facing Guildford is that it has a major shortage of office space within the town centre and a very limited pipeline of sites. The few vacant sites in the town centre are also under pressure to be converted to residential uses.

The Commercial Property Market Study, 2016 also highlights that demand for industrial sites in Guildford has been strong, evidenced by the take up and development at Henley Business Park. However, the Study recognises that there remains a persistent shortage of available industrial space. This includes light industrial space which is suitable for SMEs, but particularly for large scale warehousing. This undersupply of B8 space is at the regional scale, surrounding London.

The Employment Land Needs Assessment (ELNA, AECOM, 2017) applied a specific methodology to determine how much employment floorspace is required over the plan period. Three independently derived projections of future workplace employment were used to forecast employment change over the period 2016-2034: • Cambridge Econometrics Employment Projections, 2016 (Cambridge Econometrics); • UK Local Market Forecasts, 2016 (Experian); and • Local Authority District Forecasting Model, 2016 (Oxford Economics). Subsequently, AECOM took a mean average of the three employment forecasts and projected the growth from a 2015 baseline. Subsequently, the ratio between historic floorspace and employment growth was applied to the future employment forecast to estimate how much floorspace would be needed.

## Flooding

Local Planning Authorities, alongside partner organisations, have an increasingly important role to play in protecting communities from flooding and mitigating flood risk. Surrey County Council is the Lead Local Flood Authority in Surrey and has a lead role in managing flood risk from surface water, groundwater and ordinary watercourses in the county. To fulfil its statutory obligations under the Flood and Water Management Act and contribute to the achievement of sustainable development, the County Council is required to produce a Local Flood Risk Management Strategy and engage with Risk Management Authorities, including Guildford Borough Council, in regards to flood risk management.

The River Wey and various other watercourses pass through the borough and have contributed to localised flood events in the recent past, including within Guildford town centre. Nationally, flood events have become increasingly frequent and severe. Such trends are likely to continue elsewhere and within the borough as a result of climate change.

The main areas expected to be at risk of flooding during and beyond the plan period are identified within the Council's Level 1 Strategic Flood Risk Assessment (SFRA) and the Environment Agency's flood risk maps. The Level 1 SFRA highlights the areas at risk of fluvial, groundwater, surface water and sewer flooding and flooding caused by artificial sources. The document also identifies the borough's functional floodplain (known as flood zone 3b), which consists of land considered to be at high risk of flooding.<sup>53</sup>

## Health<sup>54</sup>

Life expectancy in the borough compares favourably with the national average. In Guildford life expectancy is 82.1 years for males and 85.3 years for females, compared to 79.2 years for males and 83 years for females at the national level.

Guildford performs well when compared to the South East and England for long-term health problems or disability. Guildford has one GP for every 1,565 residents, which is better than the national NHS standard of one GP per 1,800 patients. However, provision is not spread equally across the borough and when examining local list sizes per GP some existing under provision is apparent on surgery- by-surgery basis.

The Guildford Infrastructure Baseline 2013 sets out the position with regard to Primary Health care Facilities. It refers to the Surrey NHS Transformation Plan 2010 to 2015 which includes the key objective of reducing health inequalities through the provision of GP-led Health Centres.

Despite this encouraging overall picture, the pattern is not uniform, with male life expectancy in parts of Stoke, Westborough, Onslow, Ash Wharf and Ash South and Tongham 5.8 years shorter than that in the least deprived areas. Guildford Borough has the widest gap in life expectancy between the most and least deprived income groups of all the Surrey districts.

It is estimated that nearly one in five adults in Surrey is obese, and 12.8% of Guildford's children were obese as of July 2014. Physical activity by adults (28%) is higher than the Surrey (25%) and England (21%) average, but levels for children are lower.

In addition to this, parts of Friary and St Nicolas, Holy Trinity, Ash South and Tongham, Ash Wharf, Stoke and Ash Vale are within the top national quartile in terms of mental health problems. One in four adults drinks alcohol above sensible levels, placing Guildford in the tenth worst performing percentile.

## Air quality

Guildford Borough Council manages local air quality through the Local Air Quality Management regime. Through this regime the Council reviews air quality within its administrative area to identify if there are any air quality issues and where there are then Air Quality Management Areas (AQMAS) are declared and Air Quality Action Plans (AQAPs) are developed to address any issues. The council has not declared any AQMAS within their administrative area.

<sup>53</sup> The functional floodplain (flood zone 3b) in Guildford has historically undergone moderate levels of development. To reflect its existing state, the Level 1 SFRA differentiates between the borough's 'developed' and 'undeveloped' functional floodplain. 'Developed' functional floodplain constitutes the footprint of existing buildings located within the identified functional floodplain.

<sup>54</sup> Statistics taken from the 2014 Interim SA Report, which includes all references.



An air quality review was recently completed, examining air quality sensitivities – specifically annual mean concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> in the vicinity of sensitive receptor locations – and the potential for the Guildford Local Plan to impact. These pollutants were considered as these are the key pollutants associated with exhaust emissions, and the pollutants of greatest concern generally within the UK.

In summary the findings of the air quality review suggest that the effect of the proposed Local Plan on annual mean NO<sub>2</sub> concentrations will be negligible in the majority of the administrative area. However, further detailed modelling would be advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors, specifically:

- A3, Ripley Bypass;
- Aldershot East; and
- Area around A3/A31 junction at Onslow Village.

### Historic environment

Guildford has a rich and varied architectural heritage with 1,200 listed buildings and 38 Conservation Areas. The borough contains 151 designated Areas of High Archaeological Potential, 37 County Sites of Archaeological Importance, 35 Scheduled Monuments and 10 registered parks/gardens. The borough is also home to a series of historic country houses set within designed landscape and parklands. Guildford Cathedral, the University of Surrey, the Hog's Back and Surrey Hills are dominant landmarks.

### Housing

House prices are high, sustained by high demand, and are considerably above the national average (average house prices are currently £231,205 across England and Wales, £439,509 in Surrey and £445,524 in Guildford). This in turn has led to a vibrant private rented sector that provides housing for those who cannot afford to access the private sale market. There is an ongoing shortage of affordable housing, particularly for first time buyers, which in turn contributes to skill shortages in the borough. There is also insufficient accommodation suitable for people wishing to downsize.

Strategic Housing Market Assessment (SHMA) is an assessment of peoples' housing needs within the borough based on statistical evidence. The document provides an objectively assessed housing need. The NPPF requires councils to identify the housing needs of their area and respond positively, meeting needs as far as is consistent with the wider policies.

The SHMA indicates that approximately half of all Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy. Affordability is of greatest concern to those on the lowest earnings, including first time buyers.

For this reason affordability is measured using the ratio of the lowest 25 per cent of earnings to the lowest 25 per cent of house prices, which gives an affordability ratio. The higher the ratio, the less affordable housing is (it is in effect how many multiples of a person's salary would be needed to buy a home). Government figures show that the borough's affordability ratio was 10.92 in 2013 (the most recent data published), higher than Surrey's ratio of 10.89 and much greater than England's ratio of 6.45.

From the SHMA 2015 there is also known to be:

- a need for 40% one bedroom affordable homes; and in comparison 5% four bedroom;
- a need 10% one bedroom market homes; and in comparison 20% four bedroom market homes; and
- an estimated need for 1,334 specialist homes for older people over the plan period.

### Landscape

The Surrey Hills AONB covers a large part of the borough, stretching across the North Downs from Farnham through to Oxted in the east. In addition to the Surrey Hills AONB, the borough contains land designated as an Area of Great Landscape Value (AGLV), located in parts of the North Downs and which predominantly abuts the Surrey Hills AONB. Whilst the AGLV has acted as a buffer to the AONB, it also has its own inherent landscape quality and is significant in conserving the landscape setting of some towns. However, as a local designation, the AGLV holds less weight than the AONB in policy terms.

A landscape character assessment (LCA) is available, which characterises all landscape parcels in Guildford, with a view to guiding the direction of future change or evolution through development or management, by indicating sensitivities that should be considered, and providing the most positive opportunities for change and minimising negative impact.

### **Rural economy**

The rural areas of Guildford borough are defined as the areas outside of Ash, Tongham and Guildford urban areas. This means the rural area is large and includes a large variety of different locations such as villages, hamlets and even some of the strategic employment sites. A third of borough residents live in rural areas, and the rural wards account for 25% of all employment in the borough.

In addition to farming, food and tourism the range of jobs and businesses is extensive including shops, workshops, distribution, ICT, childcare and education, residential homes, manufacturing, property, corporate headquarters and offices.

Enterprise M3 LEP has established a Rural Action Group to promote the economic interests of the rural areas which comprise the larger part of the sub-region.

### **Transport**

The M25, A3, A31 and A331 are the principal routes that connect Guildford to the rest of the Strategic Road Network. The A3 cuts through the borough and provides a direct link to London and the south coast.

The borough benefits from twelve rail stations, including Guildford railway station, the busiest in the county, which provides access to, and interchange between, four lines.

Most communities are served by bus, which are operated on a largely commercial basis, with park and ride available on several approaches to Guildford. There is a fragmented and disjointed network of cycle routes, consisting of routes both on and adjacent to local roads, with the latter often comprising shared lanes for pedestrians and cyclists. Many cycle lanes and tracks are narrow and some are unattractive to the average cyclist.

On most local roads in the urban areas and in the villages there is at least one footway, and usually two. Facilities to assist pedestrians in crossing roads are commonplace. There is also a network of footpaths and bridleways forming a Rights of Way network, which includes various routes that can be used by off-road cyclists.

Car ownership is high in the borough (86% of households own at least one car or van) compared to regional and national levels (81% and 74% respectively). There is also a significantly greater proportion of households with two or more cars. Journeys concentrate on key parts of the road and rail networks at peak times of day, leading to congestion or over-crowding, delays and unreliability.

Significant, recurrent traffic congestion is experienced during peak hours on the A3 trunk road, both as it runs through the urban area of Guildford, with queuing extending back onto the dual carriageway section of the eastbound A31, and to the east between the Ripley junction and the A3/M25 (Junction 10) Wisley interchange junction.

Traffic acts as a major constraint to economic growth. In particular excessive congestion and poor accessibility to the town centre and key employment sites such as the Surrey Research Park act as a constraint on growth.

There are significant opportunities to progressively improve the opportunities for making sustainable travel choices and to improve the capacity of the road networks through transport infrastructure and service improvements. Surrey residents are generally very dissatisfied with the condition of the highways in the county and this issue and the desire for more effective maintenance of local roads has been a key issue recurring in consultations on the Local Plan.

The Local Plan represents a key opportunity to formulate a coherent plan to ensure that growth can be delivered and sustained across Guildford. It needs to be flexible enough to enable the strategically focused programmes developed by key stakeholders such as the LEP, Surrey County Council, Highways England, Network Rail and the University of Surrey to create accessibility and infrastructure improvements.

## Waste (and minerals)

Surrey County Council is responsible for the preparation of the Surrey Waste Plan. The Plan was adopted in May 2008 and sets out a framework for the development of waste management facilities in Surrey. The Key Diagram and Sites Maps identify the allocated sites for waste management that are safeguarded from development.

Surrey Minerals Plan Core Strategy and Primary Aggregates Development Plan Documents (DPDs) were adopted by Surrey County Council in July 2011. They form part of the Surrey Minerals and Waste Development Framework. The Plan provides the policy framework to guide minerals development in the county. The Policies Map illustrates designated Mineral Safeguarding Areas within the borough.

Surrey County Council adopted its Aggregates Recycling Joint DPD in February 2013. The Aggregates Recycling Joint DPD forms part of the Surrey Minerals and Waste Development Framework. The Aggregates Recycling Joint DPD allocates the preferred areas for locating aggregate recycling facilities. It should be read alongside the Surrey Waste Plan 2008, the Surrey Minerals Plan Core Strategy 2011 and the Surrey Minerals Plan Primary Aggregates DPD 2011.

## Water quality and water resources

Water quality and groundwater protection are significant issues in the borough, although land management decisions relating to agriculture may be more likely to result in significant effects than Local Plan decisions. Approximately thirty percent of the Council's administrative area is located on a principle aquifer whilst 14 Source Protection Zones (SPZs) are located in the borough.<sup>55</sup>

South East Water's Water Resources Management Plan indicates that, with planned reductions in demand from the customer metering programme and enhanced water efficiency, for the plan period water resource zones 4 and 5 (those relevant to Guildford) should remain in surplus for average demands. However, for peak demands a deficit is expected from 2020 onwards, after which time additional groundwater schemes will be required to satisfy demand in addition to regional transfers from neighbouring companies.

A Water Quality Assessment study has recently been completed, which includes a focus on Wastewater Treatment Works (WwTW) capacity see Figures A and B. Wastewater treatment in the borough is provided via WwTWs operated and maintained by Thames Water Utilities Limited (TWUL), ultimately discharging treated wastewater to nearby fluvial watercourses. Wastewater from the borough is treated at six WwTWs which fall in the Guildford's administrative boundary. The study concludes:

*"The calculations of flow headroom capacity found that Ash Vale WwTW would not have sufficient headroom once all the growth within the WwTW catchment is accounted for. Ash Vale would exceed its maximum permitted DWF under their existing discharge permit. Additional headroom can be made available through an application by TWUL for a new or revised discharge permit from the Environment Agency."*

<sup>55</sup> The Environment Agency defines SPZs as groundwater sources, including wells, boreholes and springs, used for public drinking water supply. To protect these sources, several restrictions will apply to the type of development permitted within the SPZs.



Figure A: The water environment and infrastructure components

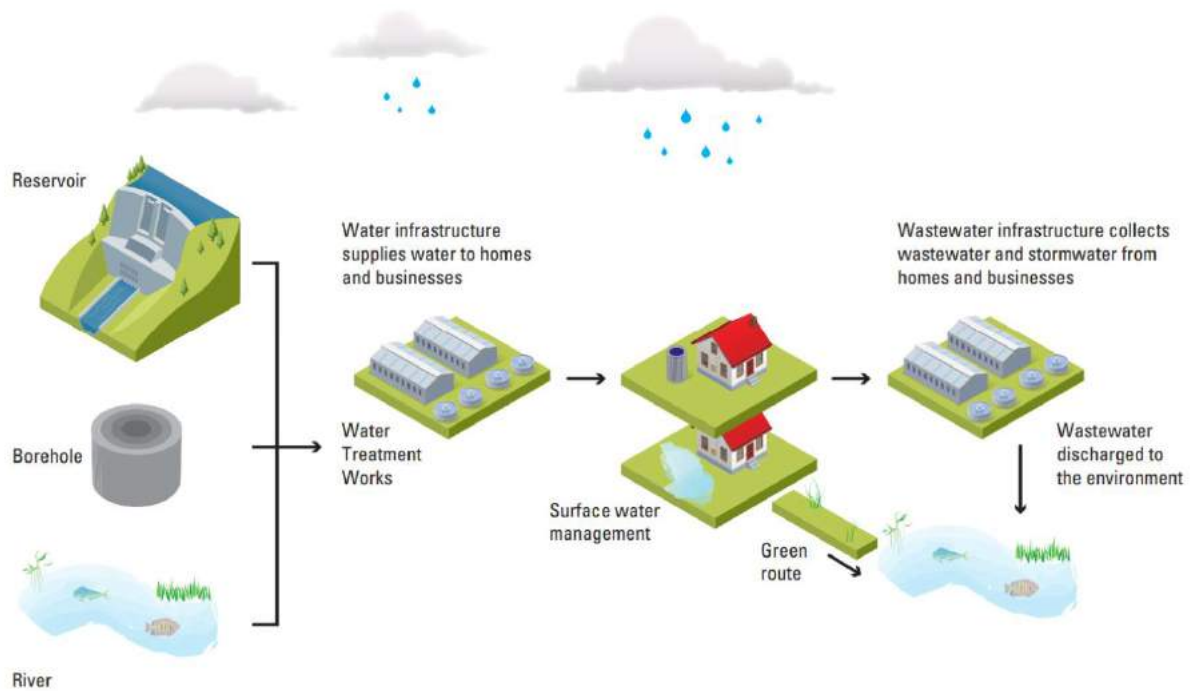
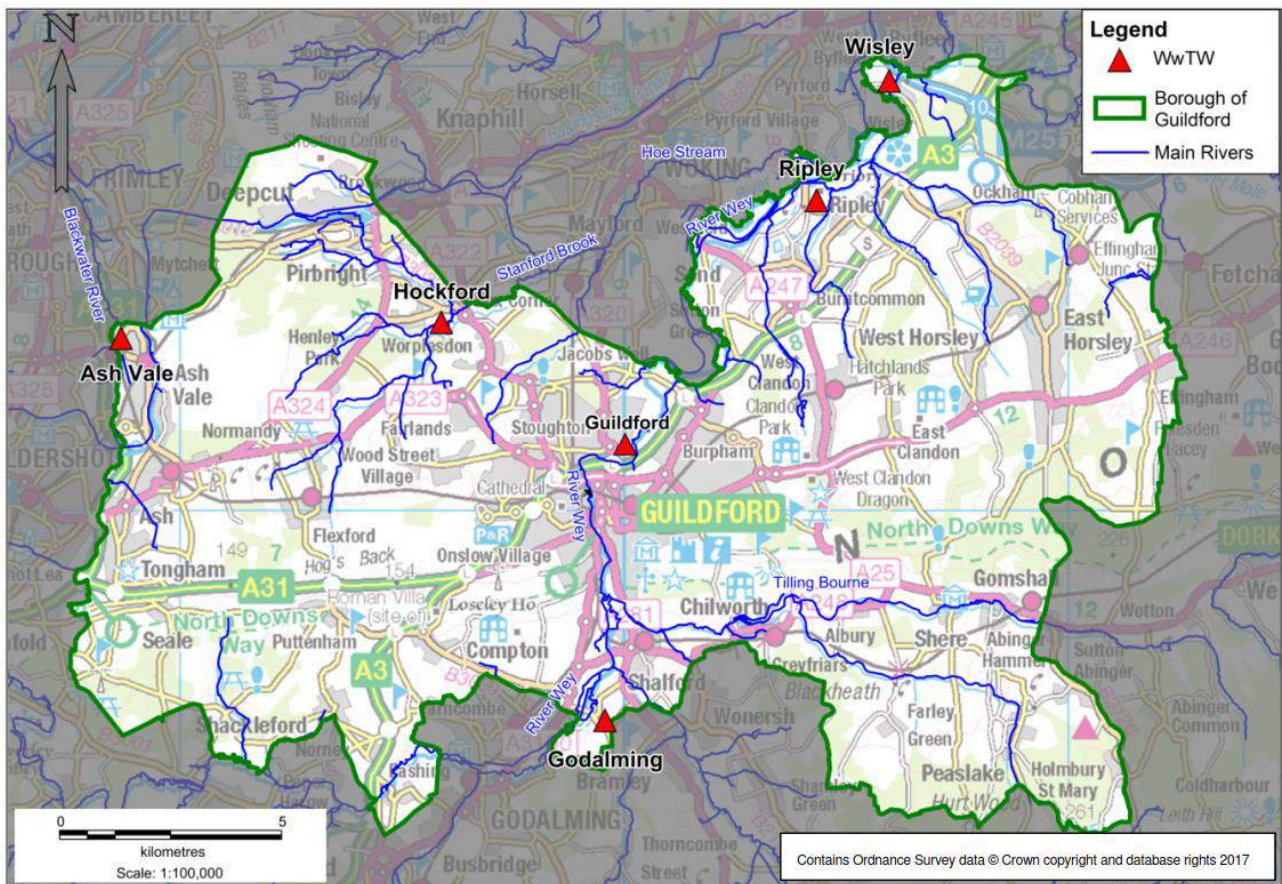


Figure B: Location of WwTWs and watercourses



## **APPENDIX III - ALTERNATIVES FOR THEMATIC PLAN ISSUES**

### **Introduction**

As explained within Chapter 5 above, whilst numerous thematic, borough-wide policy issues were the focus of alternatives appraisal in 2013 and 2014 (with appraisal findings presented within Interim SA Reports), in 2015/16/17 it was determined that these issues need no longer be a focus of alternatives appraisal, and that it would be a distraction to present past appraisal findings in full within this report. Rather, there should be a focus within this report on alternative spatial strategies (see Part 1, and Appendix V).

Nonetheless, it is appropriate to present summary information at the current time, and that is the aim of this appendix. This appendix considers a select range of policy issues in turn.

### **Mix and density**

The 2013 Interim SA Report considered four alternatives: 1) Specific mix and density of homes for the different areas within the borough; 2) Lower or similar density than is currently the case; 3) Higher densities; and 4) Case by case approach..

The preferred approach was, and still is, Option (4) - 'Case-by-case' approach (with higher density development supported in Guildford town centre) having regard to the local context, character of the surrounding area and the accessibility of the location. Whilst there is a need to make efficient use of land, to seek higher densities regardless of context could be to the detriment of local character.

### **Affordable housing**

The 2013 Interim SA Report considered alternatives in relation to site size threshold and also the proportion of affordable housing required from each site. The appraisal highlighted the tension between seeking the maximum number of affordable homes, whilst not wishing to impact on development viability such that the effect is that land-owners and developers are disincentivised.

The preferred approach is that affordable homes should be provided: on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes; and at least 40 per cent of the homes on these sites must be affordable homes. Land values and property prices are generally high, although with considerable variation. Viability evidence shows that the vast majority of developments in most locations in the borough are viable providing an affordable housing contribution of 40%.

### **Homes for students**

The 2013 Interim SA Report considered two alternatives: 1) New purpose built accommodation; and 2) New build or building conversion. No preferred approach was highlighted through appraisal; however, responses to the 2013 consultation showed that many local residents are concerned about the number of students living in market housing, which could otherwise be occupied by families.

The preferred approach is for 60% of the University of Surrey eligible student population (full time equivalent) to be provided with student bedspaces and accommodation on campus. This is considered the highest viable figure, recognising that a higher percentage could see higher vacancy rates as students will continue to choose to live off campus within the local community.

### **Tourism, arts and cultural facilities**

The 2013 Interim SA Report considered four alternatives: 1) Direct development of new facilities towards those areas where there is a lack of provision; 2) Direct new development towards those areas where most people live; 3) Promote eco-tourism as a direction for the borough; 4) Promote the borough as a location for films and develop tourist facilities to support this.

The preferred approach is to follow a broad strategy, rather than one focused on any one particular area (geographic or thematic) in particular. There is not an explicit focus on eco-tourism or filming, as there is a lack of evidence to support aspirations; however, the policy would support activities related to either. There is a specific focus of proposals which promote greater use of the River Wey as a recreational resource, recognising that this is a natural area that is less sensitive to recreational pressure than the heathlands to the north of the borough, and recognising a need to encourage access to natural environments.



### **Balancing growth with traffic and congestion**

The 2013 Interim SA Report considered five options: 1) Focus where the need to travel will be minimised and the use of sustainable transport modes can be maximised; 2) Expect all large developments to provide a long-term travel plan; 3) Continue to identify and bring forward further park and ride facilities, particularly along the northern and eastern approaches to Guildford; 4) Require new developments to make use of or contribute financially towards improvements to infrastructure; and 5) Set aside more road space on the main approaches into Guildford town centre to improve routes for pedestrians, cyclists and buses.

In practice, a policy approach reflecting a bundle of all the options is supported because a range of SA objectives can be facilitated.

### **Green open space**

The 2013 Interim SA Report considered three options: 1) Require developers of large developments to provide their own Suitable Alternative Natural Green space (SANG); 2) Continue to work to deliver the expanded and new SANG sites set out in the Council's Thames Basin Heaths SPA Strategy; 3) Identify further new SANG in suitable locations, which might necessitate the Council purchasing land.

In practice, the Council supports both options (2) and (3). The former is supported because some of these sites are in GBC ownership, which makes the process simpler. The latter is supported because this is considered the only way to meet the full need for SANG; GBC owned sites alone would not be able to deliver enough SANG land in total, and not in the right places. The option of having a threshold of 300 homes for requiring provision of SANG was not chosen because there are developments coming forward that fall below this threshold that are delivering SANG and the Council did not want this to be discouraged.

### **Built environment**

The 2013 Interim SA Report considered three options: 1) Identify locations in the borough which have strong local distinctiveness and require new developments to conform to that local style, whilst allowing more innovative design in all other areas; 2) Encourage high quality innovative and contemporary design where appropriate; and 3) Identify key views or skylines and require new development to safeguard these.

The preferred approach reflects a combination of (2) and (3), given the strategic nature of the Strategy and Sites part of the Local Plan and the need to ensure a strategic framework for achieving a better standard of built environment and design in the borough. (1) was rejected as this option espoused a development management approach that will be explored in the Part 2 Local Plan.

### **Employment space**

The 2013 Interim SA Report considered four alternative approaches to achieving higher quality space and larger units: 1) Refurbish of existing office and industrial floor space; 2) Expand existing business parks to provide new, high quality offices and industrial space; 3) Provide new, high quality offices and industrial space as part of any urban extension; 4) New high quality industrial and office space outside of the urban areas, potentially opening a new business park in the countryside.

Since 2013/14 the situation has moved on, in light of new evidence and understanding. However, it is not thought that there is a need to revisit formal alternatives appraisal. As explained within Chapter 10, the proposal is to meet objectively assessed needs in full, and hence is firmly justified.

### **Traveller accommodation**

The 2013 Interim SA Report considered eight alternatives: 1) Provide pitches/plots within towns and villages; 2) Provide rural exception sites in the Green Belt; 3) Provide sites on land classed as Countryside beyond the green belt; 4) Provide pitches/plots on previously developed land in the countryside (including in the Green Belt); 5) Where suitable, make permanent the existing temporary planning permissions for pitches/plots; 6) Encourage small scale private pitches in the countryside (including in the Green Belt); 7) Provide new sites (primarily public pitches) in the countryside (including in Green Belt); 8) Set a site size threshold and a proportion of traveller pitches/plots for large housing developments.

Since 2013/14 the situation has moved on somewhat, in light of new evidence and understanding. However, it is not thought that there is a need to revisit formal alternatives appraisal. As explained within Chapter 10, the proposal is to meet objectively assessed needs in full, and hence is firmly justified.

## APPENDIX IV - SITE OPTIONS

### Introduction

As explained within Chapters 5 and 6 above, site options - i.e. the pool of sites that are available, deliverable and potentially suitable for allocation through the plan - have been appraised.

The aim of this appendix is to:

- 1) explain how a list of (reasonable) site options was arrived at;
- 2) explain the site options appraisal methodology; and then
- 3) present the outcomes of site options appraisal.

### Identifying reasonable site options

Table A considers the hierarchy of locations in Guildford, and explains the rules that were applied in order to identify reasonable options.

Ultimately 79 reasonable site options were identified.

*Table A: Establishing reasonable site options*

Location	Comments
1) Guildford town centre	Sites with a capacity above c.25 homes and either – A) within LAA Appendix B; or B) within LAA Appendix E <u>and</u> a preferred site in 2014.
2) Guildford urban area	
3) Ash/Tongham urban area	
4) Village built up area	
5) Within proposed village Green Belt boundaries	
6) Brownfield sites in the Green Belt	
7) Countryside beyond the Green Belt	
8) Green Belt around the edge of Guildford	
9) New settlement	There is only one reasonable option.
10) Green Belt sites around villages	

### Developing the site options appraisal methodology

It was not possible to simply apply the SA framework (i.e. the list of objectives in Table 4.1) given the number of site options and limited site-specific data availability. As such, work was undertaken - including at the SA scoping stage, which included consultation<sup>56</sup> - to develop a criteria-based methodology suited to site options appraisal. The broad scope of the site options appraisal criteria is introduced in **Table B**, with the aim of demonstrating that the criteria reflect ('hang off') the SA framework as closely as possible.<sup>57</sup>

**Table C** then lists the criteria concisely alongside the rules that have been applied to categorise the performance of sites. Specifically, Table B explains how, for each of the criteria employed, the performance of sites is categorised on a Red Amber Green (RAG) scale. It is important to be clear that the aim of categorising the performance of site options is to aid differentiation, i.e. to highlight instances of site options performing relatively well / poorly. The intention is not to indicate a 'significant effect'.<sup>58</sup>

Final points to note are as follows -

- It is recognised that the site options appraisal is limited in its scope. The methodology is proportionate, given its role within the overall SA process.
- Minor amendments have been made to the methodology since 2016. Notably, one criterion (site size) has been removed, as it was not clear that this criterion related closely enough to the SA framework.

*Table B: Scope of the site options appraisal methodology*

Sustainability topic	Criteria (Location in relation to...)	Notes
<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>- European Site (SPA and SAC)</li> <li>- SSSI</li> <li>- Designations of local importance (SNCI, LNRs)</li> </ul>	
<b>Climate change</b>		

<sup>56</sup> See the Scoping Report at <http://www.guildford.gov.uk/newlocalplan/sustainabilityappraisal>

<sup>57</sup> Time and resource limitations mean limited potential to generate data for all site options through site visits and/or discussions with site promoters, recognising the need to ensure a 'level playing field' (i.e. ensure consistent data for all site options appraised).

<sup>58</sup> Whilst Regulations require that the SA process identifies and evaluates significant effects of the draft plan and reasonable alternatives, there is no assumption that significant effects must be identified and evaluated for all site options considered. See Part 1 of this report for a discussion of how reasonable alternatives have been considered through the Guildford Local Plan / SA process, and in particular see Chapter 7 for an appraisal of the reasonable alternatives at the current time.

Sustainability topic	Criteria (Location in relation to...)	Notes
<b>Communities</b>	<ul style="list-style-type: none"> <li>- Healthcare facility.</li> <li>- Recreation facilities</li> <li>- Town, District, Local centre or Village Shop</li> <li>- Primary school</li> <li>- Secondary school</li> </ul>	
<b>Economy</b>	<b>No data</b> is available to inform the appraisal of site options; however, see discussion below under 'Employment'.	
<b>Employment</b>	<ul style="list-style-type: none"> <li>- Key Employment Site</li> </ul>	<b>Limited data</b> is available to inform the appraisal. Whilst <u>straight-line distance</u> to an employment site is a positive, when examining the merits of housing site options, it is recognised that in practice most people are willing to commute some distance to work.
<b>Flooding</b>	<ul style="list-style-type: none"> <li>- Area of flood risk</li> <li>- Area of surface water flood risk</li> </ul>	<b>Good data</b> exists to inform the appraisal. For each site it is possible to calculate the <u>percentage intersect</u> with an area of flood risk.
<b>Health</b>	<ul style="list-style-type: none"> <li>- See above, under 'Communities'</li> </ul>	<p><b>Good data</b> exists to inform the appraisal, recognising that <u>walking distance</u> to community infrastructure is important, particularly for residents who are less mobile (e.g. the elderly); however, there is little or no potential to take into account the potential for development at a particular site to put 'strain' on community infrastructure, or to fund new community infrastructure.</p> <p>N.B. There is no potential to account for air quality issues, recognising that there are no designated air quality management areas (AQMA) locally.</p>
<b>Historic environments</b>	<ul style="list-style-type: none"> <li>- Registered/Historic Parks and Gardens</li> <li>- Scheduled Ancient Monument</li> <li>- Areas of High Archaeological Potential</li> <li>- Listed building</li> </ul>	<p><b>Good data</b> is available to inform the appraisal, i.e. there is good potential to highlight where development is in proximity (<u>straight-line distance</u>) to a heritage asset, and hence might impact negatively on that asset, or its setting.</p> <p>A limitation relates to the fact that it has not been possible to gather views from heritage specialists. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis. It will sometimes be the case that development can enhance heritage assets.</p>

<sup>59</sup> Walking distances were calculated using Google maps.

Sustainability topic	Criteria (Location in relation to...)	Notes
Housing	as performing better than a small site, as housing needs could be met just as effectively through allocation of a selection of small sites, as through the allocation of a single large site. It would also not be correct to assume that larger sites are more likely to provide a quantum of affordable housing in accordance with policy (i.e. less likely to be exempt from policy on viability grounds), although there may be some correlation in this respect.	
Land.	- High quality agricultural land	<p><b>Limited data</b> is available to inform the appraisal. It is possible to draw on a national data-set that shows how agricultural land quality varies, and calculate <u>percentage intersect</u>.</p> <p>However, this data-set is 'indicative' only. To establish agricultural land quality accurately there is a need to apply 'MAFF Post 1988' criteria, which involves field surveys. A number of areas around the borough have been surveyed, such that agricultural land quality is known with certainty; however, relatively few site options have been surveyed.</p>
Landscape	- AONB	<p><b>Limited data</b> is available to inform the appraisal, with it only possible to calculate <u>straight-line distance</u> to the AONB.</p> <p>The borough is divided into landscape character areas, and it is understood how capacity/ sensitivity varies between these areas; however, these areas are large scale and hence not suited to differentiating site options.</p> <p>A limitation relates to the fact that site-specific factors have not been taken into account, e.g. it has not been possible to take into account the extent to which sites are screened within the landscape.</p>
Poverty		
Previously developed land	- Previously developed land	<b>Good data</b> exists to inform the appraisal, in that it is possible to calculate the <u>percentage intersect</u> of sites with PDL.
Rural economy	assume that all site options in a rural location are to be supported, from a 'rural economy' perspective.	
Safety and security	<b>No data</b> exists to inform the appraisal of site options. Whilst the Index of Multiple Deprivation does identify areas of crime deprivation, this data is not suited to appraising site options in the Guildford context.	



Sustainability topic	Criteria (Location in relation to...)	Notes
Transport	<ul style="list-style-type: none"> <li>- 'A' road</li> <li>- Railway station</li> </ul>	
Waste	<p>waste management. It would not be correct to assume that larger schemes, or residential development in close proximity to recycling centres, will necessarily lead to better waste management.</p>	
Water	<p><b>No data</b> is available to inform the appraisal. Whilst water pollution sensitivity may vary spatially (including issues associated with the capacity of Waste Water Treatment Works), there is no mapped data at a suitable resolution. It is also the case that issues can often be addressed through development, and so are appropriately considered at the planning application stage.</p> <p>Water resource availability does not vary significantly within the borough, and hence need not be a consideration here. Similarly, it is not possible to appraise site options in terms of the potential to support water efficiency. It might be suggested that large development schemes (i.e. developments on large sites) might be more able to deliver high standards of sustainable design, which in turn support water efficiency; however, this assumption will often not hold true.</p> <p>Finally, it is unnecessary to appraise site options in terms of groundwater 'source protection zones' and 'primary aquifers'. The presence of a groundwater source protection zone or aquifer does not represent a major constraint for most (non-polluting) types of development.</p>	

Figure A: Example of walking routes calculated for the purposes of site options appraisal

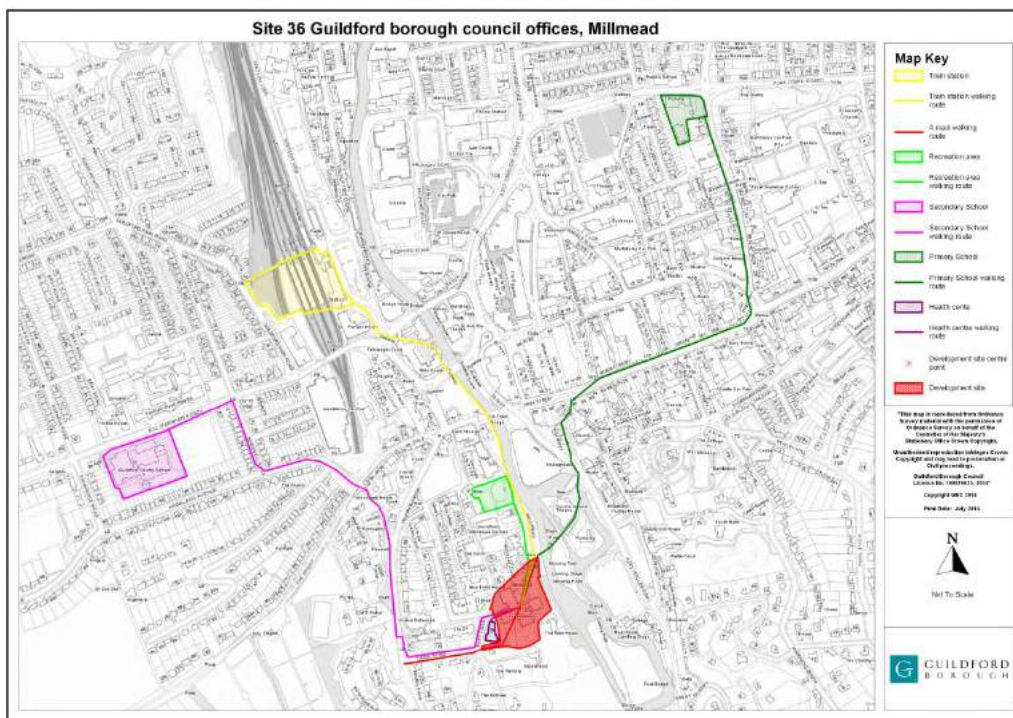


Table C: Site appraisal criteria with performance categories

Criteria (Location in relation to...)		Performance categories
1	European Site (SPA and SAC)	<b>R</b> = < 0.4 km straight-line <b>A</b> = < 5 km straight-line <b>G</b> = > 5 km straight-line
2	SSSI	<b>R</b> = < 0.4 km straight-line <b>A</b> = < 0.8 km straight-line <b>G</b> = > 0.8 km straight-line
3	Designations of local importance (SNCI, LNRs)	<b>R</b> = < 0.01 km straight-line <b>A</b> = < 0.8 km straight-line <b>G</b> = > 0.8 km straight-line
4	Key Employment Site	<b>R</b> = > 2 km walking <b>A</b> = < 2 km walking <b>G</b> = < 1 km walking <b>G</b> = < 0.5 km walking
5	Area of flood risk	<b>R</b> = Zone 3 <b>A</b> = Zone 2 <b>G</b> = Zone 1
6	Area of surface water flood risk	<b>A</b> = Yes <b>G</b> = No
7	Healthcare facility.	<b>R</b> = > 2 km walking <b>A</b> = < 2 km walking <b>G</b> = < 1 km walking <b>G</b> = < 0.5 km walking
8	Recreation facilities	<b>R</b> = > 1.2 km walking <b>A</b> = < 1.2 km walking <b>G</b> = < 0.8 km walking <b>G</b> = < 0.4 km walking
9	Town, District ,Local centre or Village Shop	<b>R</b> = > 0.8 km walking <b>A</b> = < 0.8 km walking <b>G</b> = < 0.4 km walking <b>G</b> = < 0.2 km walking
10	Primary school	<b>R</b> = > 2 km walking <b>A</b> = < 2 km walking <b>G</b> = < 1 km walking <b>G</b> = < 0.5 km walking
11	Secondary school	<b>R</b> = > 2 km walking <b>A</b> = < 2 km walking <b>G</b> = < 1 km walking <b>G</b> = < 0.5 km walking
12	Registered/Historic Parks and Gardens	<b>R</b> = < 0.01 km straight-line <b>A</b> = < 0.025 km straight-line <b>G</b> = > 0.025 km straight-line
13	Scheduled Ancient Monument	<b>R</b> = < 0.01 km straight-line <b>A</b> = < 0.025 km straight-line <b>G</b> = > 0.025 km straight-line

Criteria (Location in relation to...)	Performance categories
14 Areas of High Archaeological Potential	<b>R</b> = < 0.01 km straight-line <b>A</b> = < 0.025 km straight-line <b>G</b> = > 0.025 km straight-line
15 Listed building	<b>R</b> = < 0.01 km straight-line <b>A</b> = < 0.025 km straight-line <b>G</b> = > 0.025 km straight-line
16 High quality agricultural land	<b>R</b> = Grade 2 or known to be 3a <b>A</b> = Grade 3 or known to be 3b <b>G</b> = Grade 4 or higher
17 AONB	<b>R</b> = Within <b>G</b> = Outside
18 Previously developed land	<b>R</b> = No <b>A</b> = Part <b>G</b> = Yes
19 'A' road	<b>R</b> = > 2 km straight-line <b>A</b> = < 2 km straight-line <b>G</b> = < 1 km straight-line
20 Railway station	<b>R</b> = > 2 km straight-line <b>A</b> = < 2 km straight-line <b>G</b> = < 1 km straight-line

### Site options appraisal findings

Tables D presents an appraisal the 79 reasonable housing site options in terms the criteria introduced above. Table D lists site options in order according to -

- 1) position within the spatial hierarchy (see Table A)
- 2) ward;
- 3) whether or not the site option in question is a proposed allocation; and then
- 4) SHLAA reference number.

### Final methodological points

- It is recognised that the site options appraisal is limited in its scope. The methodology is proportionate, given its role within the overall SA process.
- It is recognised that presenting appraisal findings for all site options in tabular format is in practice of limited assistance to those interested in the spatial strategy.
  - The spreadsheet containing the underlying data is available upon request. The spreadsheet allows for more effective interrogation of the data as it is possible to compare and contrast particular sites (that might be alternatives) and examine sub-sets (e.g. sites around a particular settlement).
- The spreadsheet also includes analysis for sites that have been considered for non-housing uses.

Table C: Housing site options appraisal findings (N.B. Proposed allocations are highlighted in **bold**)

Spatial hierarchy	Ward	Site name	LAA ref	Area (ha)	1. European biodiversity	2. SSSI	3. SNCI or LNR	4. Key employment site	5. Flood risk	6. Surface water flood	7. Healthcare facility.	8. Recreation facility	9. District/Local centre	10. Primary school	11. Secondary school	12. Historic Park/Garden	13. Scheduled Monument	14. Archaeology	15. Listed building	16. Agricultural land	17. AONB	18. PDL	19. A road	20. Railway station
1	Friary and St Nicolas	77 to 83 Walnut Tree Close	8	0.53																				
			134	0.38																				
			171	2.2																				
			205	3.7																				
			1107	0.73																				
			2181	0.64																				
			173	0.48																				
		Telephone Exchange, Leapale Lane	230	0.6																				
			232	0.38																				
			1097	0.25																				
			1420	0.97																				
			1422	0.25																				
			2223	0.78																				
			2224	0.93																				
	Holy Trinity		174	0.47																				
			525	0.06																				
			1236	0.05																				
			1419	0.49																				
	Onslow		178	2.12																				

Location	Ward	Site name	LAA ref	Area (ha)	1. European biodiversity	2. SSSI	3. SNCI or LNR	4. Key employment site	5. Flood risk	6. Surface water flood	7. Healthcare facility.	8. Recreation facility	9. District/Local centre	10. Primary school	11. Secondary school	12. Historic Park/Garden	13. Scheduled Monument	14. Archaeology	15. Listed building	16. Agricultural land	17. AONB	18. PDL	19. A road	20. Railway station
2	Friary and St Nicolas				Yellow	Green	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green
					Yellow	Green	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green
					Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Yellow
					Yellow	Green	Green	Green	Red	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green
	Merrow				Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Red
	Onslow				Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Red	Green	Green
					Yellow	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Red	Green	Red
	Stoke				Yellow	Green	Red	Green	Yellow	Green	Red	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red
3	Westbor'gh				Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red
					Yellow	Green	Yellow	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red
					Yellow	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red
					Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Red
3	Ash South and Tongham				Yellow	Green	Green	Yellow	Green	Green	Green	Green	Red	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green
					Yellow	Green	Yellow	Green	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red



Location	Ward	Site name	LAA ref	Area (ha)	1. European biodiversity	2. SSSI	3. SNCI or LNR	4. Key employment site	5. Flood risk	6. Surface water flood	7. Healthcare facility	8. Recreation facility	9. District/Local centre	10. Primary school	11. Secondary school	12. Historic Park/Garden	13. Scheduled Monument	14. Archaeology	15. Listed building	16. Agricultural land	17. AONB	18. PDL	19. A road	20. Railway station
4	Clandon and Horsley	East Horsley countryside depot and the adjoining telephone exchange, St Martins Close, East Horsley	90; 353	0.3																				
		Hotel, Guildford Road, East Horsley	2044	1.3																				
5	Clandon and Horsley	<b>Land at and to the rear of Bell and Colvill, Epsom Road, West Horsley</b>	16	1.4																				
	Lovelace	<b>Land at the rear of the Talbot, High Street, Ripley</b>	1440	0.72																				
	Send	<b>Clockbarn Nursery, Tannery Lane, Send</b>	2082	2.4																				

Location	Ward	Site name	LAA ref	Area (ha)	1. European biodiversity	2. SSSI	3. SNCI or LNR	4. Key employment site	5. Flood risk	6. Surface water flood	7. Healthcare facility	8. Recreation facility	9. District/Local centre	10. Primary school	11. Secondary school	12. Historic Park/Garden	13. Scheduled Monument	14. Archaeology	15. Listed building	16. Agricultural land	17. AONB	18. PDL	19. A road	20. Railway station
6	Shalford	<b>Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford</b>	1164	21.39																				
		Broadford Business Park, Shalford	2186	1.5																				
7	Ash South and Tongh'm	<b>Warren Farm, White Lane, Ash Green</b>	2001	2.87																				
		<b>Land to the east of White Lane, Ash Green</b>	2002	2.85																				
		Land to the east of The Street, Tongham	2091	24.1																				
	Ash South and Tongh'm; Ash Wharf	<b>Land to the south and east of Ash and Tongham</b>	2000; 2247	95.4																				

Location	Ward	Site name	LAA ref	Area (ha)	1. European biodiversity	2. SSSI	3. SNCI or LNR	4. Key employment site	5. Flood risk	6. Surface water flood	7. Healthcare facility	8. Recreation facility	9. District/Local centre	10. Primary school	11. Secondary school	12. Historic Park/Garden	13. Scheduled Monument	14. Archaeology	15. Listed building	16. Agricultural land	17. AONB	18. PDL	19. A road	20. Railway station
8	Burph'm Clandon and Horsley	Gosden Hill Farm, Merrow Lane, Guildford	46	89																				
	Merrow	Land adjacent to Merrow Park and Ride, A25	2184	50.66																				
	Shalford Worplesdon	Blackwell Farm, Hogs Back, Guildford	311	229.3																				
	Worplesdon	Land north of Keens Lane, Guildford	126	5.25																				
		Liddington Hall, Liddington New Road, Guildford	78	34																				
9	Lovelace	Land at former Wisley airfield, Ockham	53; 54	95.9																				

Spatial hierarchy	Ward	Site name	LAA ref	Area (ha)	1. European biodiversity	2. SSSI	3. SNCI or LNR	4. Key employment site	5. Flood risk	6. Surface water flood	7. Healthcare facility.	8. Recreation facility	9. District/Local centre	10. Primary school	11. Secondary school	12. Historic Park/Garden	13. Scheduled Monument	14. Archaeology	15. Listed building	16. Agricultural land	17. AONB	18. PDL	19. A road	20. Railway station
10	Clandon and Horsley	Land to the west of West Horsley	15	8.4																				
		Land near Horsley Railway Station, Ockham Road North, West Horsley	240	5.7																				
		Land to the north of West Horsley	975	8																				
		Land off Ripley Lane, Ripley Lane, West Horsley	139	8.25																				
		Land to the east of Shere Road, West Horsley	2025	1.68																				
		Land to the south of West Horsley	2063	4.8																				
		Land to the south of West Horsley, Shere Road	2175	3																				
	Effingham		2029; 2061; 2117	17																				
	Lovelace	Land West of Ripley, Portsmouth Road, Ripley	190	11																				

Spatial hierarchy	Ward	Site name	LAA ref	Area (ha)	1. European biodiversity	2. SSSI	3. SNCI or LNR	4. Key employment site	5. Flood risk	6. Surface water flood	7. Healthcare facility.	8. Recreation facility	9. District/Local centre	10. Primary school	11. Secondary school	12. Historic Park/Garden	13. Scheduled Monument	14. Archaeology	15. Listed building	16. Agricultural land	17. AONB	18. PDL	19. A road	20. Railway station
10	Normandy	Rear of Alfriston House, Guildford Road, Normandy	48	1																				
		Land between Beech Lane and Westwood Lane, Flexford	75; 302; 989; 990; 2008	6.9																				
		Land to the south of Normandy and north of Flexford	368	67																				
		Land to the south of Normandy and north of Flexford	368 (part)	2.8																				
		Land at North Wyke farm, Normandy	2007	3.46																				
		land to the south east of Hunts Hill Farm, north of Normandy	2009	1.36																				
		Land to the north east of Flexford, Brickfields	2010	2.8																				
		Land to east of The Paddocks, Flexford	2011	2																				



Spatial hierarchy	Ward	Site name	LAA ref	Area (ha)	1. European biodiversity	2. SSSI	3. SNCI or LNR	4. Key employment site	5. Flood risk	6. Surface water flood	7. Healthcare facility.	8. Recreation facility	9. District/Local centre	10. Primary school	11. Secondary school	12. Historic Park/Garden	13. Scheduled Monument	14. Archaeology	15. Listed building	16. Agricultural land	17. AONB	18. PDL	19. A road	20. Railway station
10	Send	Land west of Winds Ridge and Send Hill, Send	2081	1.9																				
		Land at, Polesdon Lane and Send Marsh Road	22; 1221																					
		Land at Aldertons Farm, Send Marsh Road	29																					
		Clockbarn Nurseries, Land at Tannery Lane and Land at Polesdon Lane and Send Marsh Road, Ripley	72; 2082; 1443	12																				
		Land around Burnt Common warehouse, London Road, Send	152	9.26																				
		Papercourt Plot 'A' B D and E, Polesden Lane, Send	263																					
		Greater expansion of Send (north)	2256																					
		Greater expansion of Send (south west)	2257; 2280																					

Spatial hierarchy	Ward	Site name	LAA ref	Area (ha)	1. European biodiversity	2. SSSI	3. SNCI or LNR	4. Key employment site	5. Flood risk	6. Surface water flood	7. Healthcare facility.	8. Recreation facility	9. District/Local centre	10. Primary school	11. Secondary school	12. Historic Park/Garden	13. Scheduled Monument	14. Archaeology	15. Listed building	16. Agricultural land	17. AONB	18. PDL	19. A road	20. Railway station
10	Send and Lovelace	Land at Garlick's Arch, Send Marsh	2258	28.9																				
	Shalford	Land at Hornhatch Farm, New Road, Chilworth	12; 2032	5																				
		Pond Farm, Furze Lane and Land at New Pond Road	1460; 2241	16																				
		Land to the east of Shalford, Chinthurst Lane	2034	9.34																				
	The Pilgrims	Land south of Halfway House at Aaron's Hill, Upper Eashing	2254																					
	Worplesd'n	Land to the west of Fairlands, south west of Hunts Farm & west of Dunmore Farm, Fairlands	2014; 2072; 2190	41.28																				

## APPENDIX V - SPATIAL STRATEGY ALTERNATIVES

### Introduction

As explained within 'Part 1' above, a focus of work has been on the development and appraisal of spatial strategy alternatives, with a view to informing determination of the preferred strategy.

The alternatives (in summary) are as follows –

Option	Givens <sup>60</sup>	Variables	Quantum	Relationship to OAHN
1	8,309	Lower growth options	13,600	+ 9.4%
2		Higher growth option for variable 3.	14,080	+ 13.3%
3		Higher growth option for variable 1	14,200	+ 14.3%
4		Higher growth option for variable 2	14,600	+ 17.5%
5		Higher growth option for variables 1 and 3	14,680	+ 18.1%
6		Higher growth option for variables 2 and 3	15,080	+ 21.4%
7		Higher growth option for variables 1 and 2	15,200	+ 22.3%
8		Higher growth option for all three variables	15,680	+ 26.2%

Where the variables are as follows -

- 1) Countryside beyond the Green Belt (CBGB) - 1,146 or 1,746 dwellings
- 2) Guildford urban extensions - 3,350 or 4,350 dwellings
- 3) Green Belt around villages - 795 or 1,275 dwellings

<sup>60</sup> This 'givens' figure includes the figures discussed in paras 6.6.4-9, and 6.6.12. It also includes: housing completions and commitments (i.e. planning permissions) since the start of the plan period; an assumption for windfall sites (i.e. sites that gain planning permission despite not being allocated in the plan, on the basis that they are in accordance with plan policy); and an assumption for rural exception sites (i.e. sites that gain planning permission despite not being allocated in the plan, on the basis that they will meet a specific identified housing need attributed to a rural community). Detailed figures, and further explanation, can be seen in Table 6.3.

## Appraisal methodology

For each of the options, the assessment examines ‘likely significant effects’ on the baseline, drawing on the sustainability objectives identified through scoping (see Table 4.1) as a methodological framework.

**Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented ‘on the ground’ and what the effect on particular receptors will be.<sup>61</sup> Where there is a need to rely on assumptions in order to reach a conclusion on a ‘significant effect’ this is made explicit in the appraisal text.


Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’.

Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations.<sup>62</sup> So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of the Guildford Local Plan).

## Appraisal findings

Appraisal findings are presented below within 17 separate tables (each table dealing with a specific sustainability objective) with a final table drawing conclusions.

The appraisal methodology is explained above, but to reiterate: For each sustainability topic the performance of each scenario is categorised in terms of ‘significant effects (using **red** / **green**) and also ranked in order of preference. Also, ‘=’ is used to denote instances of all alternatives performing on a par.

Conserve and enhance <b>biodiversity</b> and the natural environment								
Rank		2	2	3	3	6	6	7
Significant effects?	Yes							
	<p>A primary consideration is the need to avoid the risk of impacts to the internationally important Thames Basin Heaths Special Protection Area (SPA); however, there is also a need to consider impacts to areas designated as being of national importance (Sites of Special Scientific Interest, SSSIs) and local importance (Sites of Nature Conservation Importance, SNCIs). Furthermore, there is a need to consider the potential for impacts to non-designated habitats that contribute to ecological connectivity at the landscape scale, and more generally ‘green infrastructure’ locally. With regards to non-designated habitat, evidence-base is limited; however, the location of broad Biodiversity Opportunity Areas (BOAs) is known.</p> <p>The relative merits of the alternatives are as follows -</p> <ul style="list-style-type: none"> <li>Option 1 would involve the least ‘land take’ and hence is clearly best performing from a biodiversity perspective; however, there remains the potential for significant negative effects, recognising that development at the locations that are a ‘constant - i.e. assumed under all</li> </ul>							

<sup>61</sup> Considerable assumptions are made regarding infrastructure delivery, i.e. assumptions are made regarding the infrastructure (of all types) that will come forward in the future alongside (and to some extent funded through) development.

<sup>62</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

options, including Option 1 - will involve significant loss of greenfield land in sensitive locations. Notably -

- Wisley Airfield is adjacent to the SPA and the majority classified as an SNCI;
  - Blackwell Farm (Guildford extension) sits within the Wanborough and Normandy Woods and Meadows (WNWM) BOA and borders Broadstreet Common SNCI;
  - Gosden Hill Farm (Guildford extension) sits within the Clandon to Bookham Parkland BOA and borders two SNCIs (Merrow Lane Woodland; and Cotts Wood);
  - Keens Lane (Guildford extension) partially intersects the 400m SPA buffer;
  - the three extensions at the Horsleys sit within the Clandon to Bookham Parkland BOA and one borders the Lollesworth Wood SNCI;
  - extensions at Tongham / Ash Green are within the WNWM BOA, border ancient woodland and in one case the site borders the Ash Green Wood SNCI;
  - the Garlicks Arch extension at Send Marsh / Burnt Common includes two small patches of ancient woodland, and a stream that forms part of the River Wey (plus tributaries) BOA.
- Option 2 gives rise to limited concerns over-and-above Option 1. Of the four additional extensions to villages, two are associated with strategic constraints. Firstly, East of Glaziers Lane, Flexford, has a water body and stream at its eastern extent, which drains south to nearby Little Flexford SNCI, and falls within the Wanborough and Normandy Woods and Meadows BOA. Secondly, Hornhatch Farm, Chilworth, is adjacent to Wonnesh Common, which whilst not designated as an SNCI is designated common land, potentially indicating a degree of biodiversity value.
  - Option 3 performs similarly to Option 2. There would be a large extension to Tongham, in place of four smaller extensions to villages, and whilst the Tongham site borders a SNCI, it does not fall within a BOA.
  - Option 4 gives rise to some concern over and above Options 2 and 3, as there would be a large allocation at Clandon Golf (in place of the sites discussed under Options 2 and 3), which is constrained, with more than 50% of the site bordering an SNCI (in fact three separate SNCIs, all falling within the North Downs Scarp and Dip BOA).
  - Option 5 performs similarly to Option 4. It would involve allocation of the sites discussed under Options 2 and 3.
  - Option 6 performs worse than Options 4 and 5. It would involve allocation of Clandon Golf (as per Option 4) and the sites discussed under Option 2.
  - Option 7 performs similarly to Option 6. It would involve allocation of Clandon Golf and the site discussed under Option 3.
  - Option 8 performs least well. It would involve allocation of all of the sites discussed above.

In **conclusion**, the degree of impact generally increases in-line with the quantum of growth, although the correlation is not entirely linear, as there are instances of an option involving only marginally higher growth and/or higher growth through less constrained sites.

With regard to effect **significance**, it is appropriate to conclude that all options would lead to significant negative effects. It might be suggested that lower growth (e.g. Option 1) would avoid significant negative effects; however, this is not clear given the extent of biodiversity sensitivities. It is not even clear that planning for 'below OAHN' (i.e. a level of growth dismissed as unreasonable, and not reflected in the alternatives) would enable significant negative effects to be avoided, given that unmet needs would have to be met elsewhere in the HMA (or a neighbouring HMA), where there are broadly equivalent biodiversity sensitivities.

Mitigate **climate change** through reducing emissions of greenhouse gases

Rank	4	4	3	2	3	2	★1	★1
Significant effects?	No							
	<p>Car travel is a key issue in that it has a major bearing on per capita CO<sub>2</sub> emissions; however, this matter is best considered below under 'Transport'. It is therefore appropriate to focus here on matters relating to per capita CO<sub>2</sub> emissions from the built environment.</p> <p>The potential for new development to incorporate low carbon / renewable energy infrastructure (district heating, in the Guildford context),<sup>[1]</sup> and achieve high standards of sustainable design/construction, is linked to a number of factors, which enables differentiation of the spatial strategy alternatives. Specifically, the scale, mix and density of a scheme has a bearing, and the potential to deliver district heating is also enhanced where a scheme is located close to a source of heat. The Council has established<sup>[2]</sup> that district heating options should be explored at: residential only developments of at least 50 dph and/or 300 dwellings; (b) residential only developments of 35 dph or above located near a source of heat (or an existing district heating scheme that can be tapped into); and (c) mixed developments of 50 dwellings or more that include either two or more non-residential uses or a single use that would generate waste heat.</p> <p>The relative merits of the alternatives are as follows -</p> <ul style="list-style-type: none"> <li>• Option 1 - and indeed all of the options discussed here - would involve several schemes with potential to support lower per capita CO<sub>2</sub> emissions from the built environment - <ul style="list-style-type: none"> <li>○ Development within Guildford town centre and the Guildford urban area will capitalise on particular opportunities established by the Guildford Renewable Energy Mapping Study. Specifically, the study identified five 'heat priority areas' focused on Central Guildford, the Royal Surrey County Hospital and University of Surrey's Stag Hill Campus and adjacent industrial estates.</li> <li>○ At Wisley Airfield there should be the potential to deliver an ambitious district heating scheme as part of a 2,000 home scheme, albeit there is uncertainty given competing funding priorities (e.g. SPA and avoidance and mitigation measures).</li> <li>○ The scale of development at the two major urban extensions to Guildford – Blackwell Farm and Gosden Hill – gives rise to considerable opportunity (to achieve high standards of sustainable design and construction, and deliver a high quality district heating scheme). The Blackwell Farm site is located close to a heat priority area; however, it is unlikely to be the case that this results in particular opportunity.</li> </ul> </li> <li>• Option 2 would not give rise to any additional opportunities, as the additional sites are all relatively small extensions. N.B. There is an argument to suggest that Option 2 performs worse than Option 1, as any unmet need under Option 1 could be provided for at a larger scheme outside of Guildford; however, this is unclear and a marginal consideration.</li> <li>• Option 3 gives rise to opportunity over-and-above Option 2, as the additional extension to</li> </ul>							

<sup>[1]</sup> District heating is the provision of heat to more than one dwelling from a central heat source. It is best suited to areas of high density living and especially in mixed use developments that spread the demand for heat during the day. Where there is a source of excess heat e.g. from a manufacturing plant, they are especially effective. District heating typically delivers carbon savings through the efficiency of scale, but where it can be combined with a low carbon heat source it can provide even more carbon savings. District heating is a form of 'decentralised energy', i.e. energy that is generated near where it is used, rather than at a large plant further away and supplied through the national grid. Energy can refer to electricity and heat, but there is a focus on heat in Guildford.

<sup>[2]</sup> The Guildford Renewable Energy Mapping Study (2015) is available at: <http://www.guildford.gov.uk/article/14418/Guildford-Renewable-Energy-Mapping-Study>. Also, the Council collaborated with the Carbon Trust in 2016, when finalising thresholds.



Tongham would be large enough (c.600 homes) to deliver a high quality district heating scheme. It is also noted that another large allocation is adjacent, hence it is fair to assume that a delivery of a district heating network could be coordinated across the two sites (albeit the two sites are in separate land ownership).

- Option 4 gives rise to opportunity over-and-above Option 3, as this option would involve allocation of Clandon Golf, in place of the additional extension to Tongham. Whilst both sites are well above the 300 home threshold identified by the Council, it is fair to assume that Clandon Golf could be associated with opportunity over-and-above the Tongham site, as it would involve 400 additional homes and would also be a mixed use scheme (beneficial, as heat demand is spread across the day).
- Option 5 performs similarly to Option 3. It would involve allocation of the sites discussed under Option 2 and the site discussed under Option 3.
- Option 6 performs similarly to Option 4. It would involve allocation of Clandon Golf (as per Option 4) and the sites discussed under Option 2.
- Option 7 performs relatively well (i.e. better than Option 4). It would involve allocation of Clandon Golf and the additional extension to Tongham.
- Option 8 performs as per Option 7.

In **conclusion**, the potential to reduce average per capita CO<sub>2</sub> emissions from the built environment generally increases in-line with the quantum of growth, although the correlation is not entirely linear, as not all additional sites that come into play are large sites where there is a likelihood of delivering low carbon infrastructure and/or achieving ambitious standards of low carbon design and construction.

With regard to effect **significance**, it is not possible to draw strong conclusions, recognising that climate change mitigation is a global issue.

Create and sustain vibrant communities								
	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Rank	1	2	2	1	3	3	3	4
Significant effects?	Yes							No
Discussion	<p>The sustainability objective here is to “<i>Create and sustain vibrant communities</i>”, a broad objective that overlaps considerably with a number of other sustainability objectives including those relating to ‘Health’, ‘Housing’, ‘Poverty and social exclusion’, ‘Transport’, ‘Safety and security’ and ‘Rural economy’. Given the need to avoid overlap and repetition, it is appropriate to focus here on the matter of community infrastructure (capacity / access).</p> <p>The relative merits of the alternatives are as follows:</p> <ul style="list-style-type: none"> <li>• Option 1 - and indeed all of the options discussed here - would involve sites several strategic sites with the potential to deliver strategic community infrastructure. Notably (leaving aside matters associated with Guildford town centre), there are opportunities at– <ul style="list-style-type: none"> <li>○ Blackwell Farm (a secondary school; a local centre; traveller pitches; extensive open space (SANG); and transport infrastructure that contributes to the Guildford Sustainable Movement Corridor, helping to facilitate the new rail station, and increasing accessibility to key destinations including the Hospital);</li> <li>○ Gosden Hill (a secondary school; a local centre; traveller pitches; SANG; and transport infrastructure that contributes to the Movement Corridor, including a rail station); and</li> </ul> </li> </ul>							

- Wisley Airfield (a secondary school; a local centre; traveller pitches; and SANG).
- Option 2 gives rise to some concerns over-and-above Option 1, as the four additional sites supported are relatively small extensions with limited or no potential to deliver new or upgraded community infrastructure; and all except Aaron's Hill, Godalming, are located at villages with no local centre. The Aaron's Hill site is within c.1km of Godalming town centre 'as the crow flies', although this is via a public bridleway that is through woodland, steep in parts and crosses the railway line. The site is also notable in that the Aaron's Hill area ('super output area', SOA) stands-out as the second-most 'relatively deprived' SOA within Waverley Borough, and within Guildford Borough there are only four worse performing SOAs. The site is larger – at 200-300 homes - but it is not clear that this would enable delivery of community infrastructure (a single form entry primary school is nearby).
- Option 3 also gives rise to some concerns over-and-above Option 1, as the additional extension to Tongham (which would be delivered in place of the Option 2 sites) would not be large enough (at c.600 homes) to deliver strategic community infrastructure (e.g. a local centre). However, it is noted that the site is well-located it that would be within easy walking distance of a small local centre, with higher order services/facilities accessible to the west in Aldershot (including a secondary school c.1.5km distance via an A331 walking/cycling underpass, and Aldershot town centre c.3.5km distant). Another large allocation is adjacent; however, fragmented land ownership would likely hinder delivery of strategic community infrastructure (i.e. there would be 'piecemeal' growth, an issue at Ash/Tongham).
- Option 4 performs better than Options 2 and 3, and on balance is judged to perform similarly to Option 1. The 1,000 Clandon Golf (which would be delivered in place of the Option 2/3 sites) should enable strategic community infrastructure delivery. Notably, site promoters have proposed a secondary school and an extension to the adjacent Park and Ride. However, with regards to secondary school provision, Surrey County Council prefers a strategy with schools delivered at Gosden Hill Farm and at Wisley airfield.
- Option 5 would involve higher growth, with additional homes at the locations with limited merit, as discussed under Options 2 and 3.
- Option 6 and 7 would involve higher growth, with a proportion of the additional homes at a location with merit (Clandon Golf).
- Option 8 would involve higher growth, with a smaller proportion of the additional homes at a location with merit (Clandon Golf). The scale of growth could potentially necessitate consideration being given to the option of Clandon Golf delivering a secondary school.

In **conclusion**, Options 1 and 4 are best performing as there will be a focus at strategic-scale schemes able to deliver community infrastructure. Option 8 is worst performing, as this is a higher growth option with c.50% of the additional homes, over-and-above Option 1, directed to locations that perform less well from a 'communities' perspective, as it is not anticipated that development would support new or upgraded strategic community infrastructure.

With regard to effect **significance**, most options would result in significant positive effects, particularly given the potential to deliver new secondary school provision. It is suggested that this conclusion cannot be reached for Option 8; however, it is recognised that this is uncertain.

N.B. The alternatives appraisal in 2016 identified a spatial strategy option that would result in significant negative effects; however, there is no equivalent option at the current time. Specifically, 2016 Option 2 was predicted to result in significant negative effects as it would involve high growth at Send combined with non-allocation of Wisley or Clandon Golf, thereby leading to uncertainty in respect of secondary school provision in the east of the borough.

Maintain Guildford borough and Guildford town's competitive economic role								
Rank	8	7	6	5	4	3	2	1
Significant effects?	No							Yes
	<p>The sustainability objective here is to “<i>Maintain Guildford borough and Guildford town's competitive economic role</i>”, a broad objective that overlaps with the ‘Employment’ related objective (“<i>Facilitate appropriate employment development opportunities to meet the changing needs of the economy</i>”) that is a focus of separate discussion below. Given the need to avoid overlap and repetition, it is appropriate to focus here on the matter of housing growth <u>quantum</u>.</p> <p>The following is a key quote from the 2015 SHMA –</p> <p><i>“Housing provision below [OAHN] could potentially constrain economic growth locally, or result in changes to commuting dynamics. Should the Councils seek to change commuting dynamics, we would recommend that the feasibility of this is tested in detail and considered.”</i></p> <p>The OAHN figure referred to is that for the West Surrey Housing Market Area (HMA), which is also a Functional Economic Market Area (FEMA). On the basis that there is a risk of Woking under-supplying, and thereby creating a shortfall of housing within the HMA/FEMA (see discussion in Box 6.8), it follows that there is merit to Guildford providing for a figure above its SHMA assigned OAN figure (654 dpa).</p> <p>It might also be suggested that delivering above the OAHN figure could provide for a useful contingency, should it transpire that the economic growth forecasts used as the basis for establishing OAHN were conservative; however, it is not clear that this an argument holds sway. Whilst current understanding of OAHN within the HMA (taking account of the 2017 Guildford-focused SHMA Addendum) reflects no economic uplift for Waverley and only a very small economic uplift for Guildford, it reflects a large economic uplift for Woking.</p> <p>In <b>conclusion</b>, higher growth options are to be supported given the likelihood of housing undersupply within the HMA, which is also a FEMA.</p> <p>With regard to effect <b>significance</b>, it is fair to conclude that Option 8 would result in significant positive effects as there would be certainty of OAN being met within HMA, and therefore economic opportunities realised within the FEMA (without unsustainable commuting). There is an argument to suggest that Option 1 would result in significant negative effects as OAHN would not be met within the HMA (on the assumption that unmet housing needs will raise from Woking, and Waverley is not likely to meet much of these unmet needs, if any); however, it is not clear that this is the case. Enterprise M3 Local Enterprise Partnership (LEP) responded to the 2016 consultation stating their support for a housing growth quantum in Guildford that involves providing for the OAHN figure assigned by the SHMA.</p>							

Facilitate appropriate **employment development** opportunities to meet changing needs

Rank	2	5	5	1	5	3	3	4
Significant effects?	Yes	No		Yes	No			

The sustainability objective here is to “*Facilitate appropriate employment development opportunities to meet the changing needs of the economy*”, a broad objective that overlaps with the ‘Economy’ related objective (“*Maintain Guildford borough and Guildford town’s competitive economic role*”) that is a focus of separate discussion above. Given the need to avoid overlap and repetition, it is appropriate to focus here on the matter of housing growth distribution.

The relative merits of the alternatives are as follows:

- Option 1 would deliver the quantum of employment floorspace established as needed by the Employment Land Needs Assessment (ELNA); specifically: 51,300 m<sup>2</sup> floorspace across the Wisley Airfield, Blackwell Farm and Gosden Hill sites; 3,000 m<sup>2</sup> in Guildford town centre; 8,500 m<sup>2</sup> within the Guildford urban area; and 7,000 m<sup>2</sup> at Send Marsh / Burnt Common.
- Option 2 gives rise to some concerns over-and-above Option 1, as the four additional sites are small extensions that would not deliver additional employment floorspace. The risk in theory under this option, and other options discussed below, is insufficient local employment for the resident workforce, leading to unemployment and/or unsustainable out-commuting. However, in practice the sites tend to be fairly well located in this respect, with one located adjacent to a train station, another located close to a train station, another located on the edge of Godalming and the fourth located close to employment allocations (Send Marsh / Burnt Common and Gosden Hill Farm).
- Option 3 also gives rise to notable concerns over-and-above Option 1, as the additional site - an additional extension to Tongham - would not deliver employment floorspace. Again, the risk is that there would be an imbalance between the size of the local workforce and the number of job opportunities, leading to unemployment and/or unsustainable out-commuting. It is recognised, however, that residents of Tongham will often ‘look west’ towards employment growth areas in the Blackwater Valley.
- Option 4 gives rise to opportunity over-and-above Option 1, as Clandon Golf would deliver additional employment land (assumed to be viable, despite its location away from the A3). It is fair to assume that higher housing growth aligned with higher employment growth is to be supported at Guildford (given the town’s designation as one of the four ‘Growth Towns’ within the ‘Enterprise M3’ Local Enterprise Partnership’s area); however, it is recognised that higher growth gives would give rise to issues of traffic congestion (plus other issues beyond), which in turn would have a bearing on economic activity.
- Option 5 would involve higher growth, with additional homes at the locations that would not also deliver new employment land, as discussed under Options 2 and 3.
- Option 6 and 7 would involve higher growth, with a proportion of the additional homes at a location that would also deliver new employment land (Clandon Golf).
- Option 8 would involve higher growth, with a smaller proportion of the additional homes at a location that would deliver new employment land (Clandon Golf).

In **conclusion**, Option 4 performs best as higher housing growth aligned with higher employment growth is to be supported at Guildford (from a pure national/regional economic growth perspective, leaving other considerations aside). Option 1 also performs well, whilst other options perform less well as there would be the possibility of an imbalance between

workforce and jobs locally.

With regard to **significance**, Options 1 and 4 would lead to significant positive effects as established economic growth targets/objectives would be realised. Significant negative effects are not predicted for other options, as the employment land target established by the ELNA would be achieved, and there would be good potential to commute to employment.

Reduce the risk of **flood**ing and the resulting detriment to the public... the economy and the environment

	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Rank	1	2	1	1	2	2	1	2
Significant effects?	No							
Discussion	<p>Flood risk is a considerable constraint to growth, as established through a Level 1 Strategic Flood Risk Assessment (Level 1 SFRA). Flood risk in the borough is primarily associated with the floodplain of the River Wey, which passes through the centre of Guildford Town, although there are also other smaller water courses associated with flood risk, as well as some risk of flooding from other sources (surface water, groundwater, sewers and artificial sources).</p> <p>The relative merits of the alternatives are as follows:</p> <ul style="list-style-type: none"> <li>Option 1 primarily comprises sites that were proposed for allocation within the 2016 Proposed Submission Plan, having been subject to the sequential and exception Test. The final conclusion of the Sequential and Exception Test Report (2016) was that –  <i>“The sequential test has been applied, and is passed for the sites listed as Proposed Submission Local Plan (2016) site allocations...”</i>  <i>The exception test has been applied where required. Part 1 has been passed for the sites discussed, and part 2 will be considered in more detail at the development management stage, informed by the Level 2 SFRA. Whilst it is considered that the exception test is not required for the residential development proposed, as the site allocations policies will not allow residential development within flood zone 3, the exception test has been applied none the less and is deemed to be passed. In accordance with the flood risk compatibility table in the NPPG, the exception test is not required for less vulnerable uses in flood zone 3 (i.e. the cinema site, and 77-83 Walnut Tree Close, both in Guildford).”</i> </li> <li>Option 2 gives rise to limited concerns over-and-above Option 1. The additional site at Flexford is associated with a degree of surface water flood risk at its eastern extent; however, it is anticipated that risk could be avoided through careful layout. Potentially of greater note is the location of the site at Aaron’s Hill, Godalming, on a hill above the River Wey. The site itself is not subject to flood risk; however, the eastern extent of the site (which falls within Waverley Borough) does intersect the ‘Flood Watch’ zone that has been defined for Godalming town centre and the surrounding steep hillsides.</li> <li>Option 3 does not give rise to concern over-and-above Option 1, as the additional site - an additional extension to Tongham – is not associated with flood risk.</li> <li>Option 4 does not give rise to concern over-and-above Option 1, as the additional site - Clandon Golf – is associated with just a few small patches of surface water flood risk.</li> <li>Option 5 would involve higher growth, with additional homes at the locations discussed under Options 2 and 3. It performs as per Option 2.</li> <li>Option 6 would involve higher growth, with additional homes at the locations discussed under Options 2 and 4. It performs as per Option 2.</li> </ul>							



- Option 7 would involve higher growth, with additional homes at the locations discussed under Options 3 and 4. It performs as per Options 1, 3 and 4..
- Option 8 would involve higher growth, with additional homes at the locations discussed under Options 2, 3 and 4. It performs as per Options 2, 5 and 6.

In **conclusion**, it is appropriate to 'flag' Options 2, 5, 6 and 8 as performing less well as two of the additional sites are associated with a degree of flood risk, albeit this is likely to be minor.

With regard to effect **significance**, none of the options are predicted to result in significant effects. Sites under Option 1 have been subject to the sequential and exceptions tests, and it is likely that the additional sites under Options 2, 5, 6 and 8 could similarly pass the tests.

Facilitate improved **health and well being** of the population, including... reducing inequalities in health

	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Rank	=	=	=	=	=	=	=	=
Significant effects?	No							
Discussion	<p>The sustainability objective here is to <i>"Facilitate improved health and well-being of the population, including enabling people to stay independent and reducing inequalities in health"</i>, an objective that overlaps considerably with a number of other sustainability objectives including those relating to 'Communities', 'Housing', 'Poverty and social exclusion' and 'Transport'. Given the need to avoid overlap and repetition, there is no potential to differentiate the alternatives in terms of 'health'. The following are issues, but do not enable differentiation -</p> <ol style="list-style-type: none"> <li>Access to a GP surgery – All of the sites that are a focus of this appraisal (i.e. are a variable across the alternatives, and hence enable differentiation) would enable access to a GP surgery, and there is little potential to conclude on the ability of surgeries to accept additional patients or expand. For example, with regards to the Option 2 sites, there is GP surgery at Send (accessible from Aldertons Farm), Normandy (accessible from East of Glaziers Lane, Flexford) and Wonnersh (accessible from Hornhatch Farm, Chilworth). Residents at a south Tongham extension (Option 3) would be c. 1.5 km from a GP surgery in Aldershot (accessible by walking/cycling via an A331 underpass), with a proposed new GP surgery at Ash/Tongham closer (potentially under 1km).</li> <li>Royal Surrey County Hospital - Whilst an aim of the plan is to support the functioning of the Hospital the alternatives currently under consideration have little or no bearing. Whilst Blackwell Farm is supported by the Hospital, it is a constant across the alternatives.</li> <li>Health deprivation – The Index of Multiple Deprivation (IMD) 'Health and Disability' domain dataset shows a number of locations under consideration here to be some areas of 'relative health deprivation', namely the Send/Ripley area, the Chilworth area, the Aaron's Hill (Godalming) area and the Tongham area. These areas would be directed some growth, or additional growth, under Options 2, 3, 5, 6 and 8; however, there is little potential to suggest implications for existing issues of health deprivation, either positive or negative.</li> <li>Active travel – It might be suggested that sites on the edge of Guildford (e.g. Clandon Golf) would support walking/cycling to reach employment, services, facilities etc, whilst sites at villages perform less well in this respect; however, there is little certainty. All sites would support access to high quality countryside and open space.</li> <li>Air quality – The recently prepared Air Quality Review for the Local Plan concludes: <i>"... the findings of the air quality review suggest that the effect of the proposed Local Plan on annual mean NO2 concentrations will be negligible in the majority of the GBC administrative area. However, further detailed modelling would be advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to</i></li> </ol>							



*sensitive receptors, specifically: A3, Ripley Bypass; Aldershot East; and the area around the A3/A31 junction at Onslow Village.” There is little or no reason to suggest that the alternatives will have differential impacts on traffic at any of these locations.*

In **conclusion**, it is not possible to differentiate the alternatives, nor is it possible to conclude on effect **significance** (recognising the wide-ranging nature of health determinants).

Protect, enhance, and where appropriate make accessible... archaeological and historic environments...

	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Rank	1	2	3	4	4	5	6	7
Significant effects?	No							
Discussion	<p>A primary consideration is the need to avoid impacts to listed buildings and their setting; and conservation areas (within which there will typically be a concentration of listed buildings). Guildford has over 1,000 statutory listed buildings (as well as over 200 locally listed buildings), 40 conservation areas, eight historic parks and gardens (as well as 52 locally important parks and gardens) and 24 scheduled ancient monuments.</p> <p>The relative merits of the alternatives are as follows:</p> <ul style="list-style-type: none"> <li>Option 1 is a low growth option and hence is best performing (albeit in certain circumstances development can support the achievement of historic environment objectives); however, a number of the sites under this option – i.e. sites that are a constant across the alternatives – are in proximity to heritage assets. A notable concern relates to the Wisley Airfield site (2,000 homes), which abuts the northern extent of the Ockham Conservation Area (although it is noted that there is only one grade 2 listed building in this part of the conservation area). Also, another listed building is located close to the site’s south-eastern extent, at Martyr’s Green; and there is a likelihood of increases to traffic through the Ripley Green and Ockham Conservation Areas (the former associated with a high concentration of listed buildings).</li> <li>Option 2 gives rise to some concerns over-and-above Option 1, with two of the four additional extension sites in proximity to a heritage asset. Aldertons Farm, Send Marsh / Burnt Common, is located close to one isolated listed building, and also a cluster of listed buildings (surrounding a small common); however, it is not clear that there is the potential for impacts to setting, as there are buildings likely to provide screening. Aarons Hill, Godalming, is potentially also constrained, with a cluster of listed buildings at Upper Eashing, a short distance to the north; however, once again the potential for impacts is not clear.</li> <li>Option 3 gives rise to some concerns over-and-above Option 2, as the additional extension to Tongham would border six listed buildings plus several locally listed buildings.</li> <li>Option 4 gives rise to some concerns over-and-above Option 3, as this option would involve allocation of Clandon Golf, which is adjacent to Clandon Park (which contains listed buildings) and located on rising land. There is also a cluster of listed buildings c.350m to the west, which includes the Grade 2* listed Clandon Park Gate House, and West Clandon Conservation Area is located to the east (unlikely to be impacted).</li> <li>Option 5 would involve higher growth, with additional homes at the locations discussed under Options 2 and 3. It is judged to perform similarly to Option 4.</li> <li>Option 6 would involve higher growth, with additional homes at the locations discussed under Options 2 and 4. It performs worse than Options 4 and 5.</li> <li>Option 7 would involve higher growth, with additional homes at the locations discussed</li> </ul>							

under Options 3 and 4. It performs worse than Option 6.

- Option 8 would involve highest growth, with additional homes at the locations discussed under Options 2, 3 and 4. It perform worse than Option 7.

In **conclusion**, the degree of impact generally increases in-line with the quantum of growth, although the correlation is not entirely linear, as there is an instance of an option involving only marginally higher growth and higher growth through less constrained sites.

With regard to effect **significance**, it is not possible to conclude significant negative effects. The discussion above identifies the possibility of impacts to a very small proportion of the borough's conservation areas and listed buildings, and it is not possible to conclude that there will be in-combination effects (i.e. that the impact to historic character as a whole locally will be significantly greater than the sum of its parts).

Provide sufficient **housing**... taking into account local housing need...

	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Rank	8	7	6	5	4	3	2	1
Significant effects?	Yes							
Discussion	<p>In line with para. 47 of the National Planning Policy Framework (NPPF), local planning authorities should: <i>“use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with [principles of sustainable development].”</i> As such: a Strategic Housing Market Assessment (SHMA) study for the West Surrey housing market area (HMA) - which comprises Guildford, Woking and Waverley - was published in September 2015, thereby superseding the draft West Surrey SHMA from 2014; and then a Guildford SHMA addendum was published in 2017, providing a factual update for Guildford, reflecting the latest data (in particular, the 2015 mid-year population estimate, the 2014-based population and household projections and the latest economic forecasts). The aim of SHMA is to establish Objectively Assessed Housing Needs (OAHN) at the functional scale of the West Surrey HMA, and also for the component authorities. The SHMA goes through a number of considerations in turn, before arriving at final OAN figures. Taking account of demographic needs and uplifts, the conclusion of the SHMA Addendum (2017) is that Guildford Borough's OAHN is 654 dpa, or 12,426 in total (2015-34).</p> <p>The relative merits of the alternatives are as follows -</p> <ul style="list-style-type: none"> <li>• Option 1 – Would provide for 'OAHN plus a 'buffer'. A buffer should help to ensure that OAHN is provided for in practice, recognising that the strategy would involve a high reliance on large ('strategic') sites that are inherently at risk of delivering slower than anticipated.</li> <li>• Option 2 - Would put in place a larger buffer, resulting in a slightly reduced risk of under-supply, relative to Option 1. Furthermore, this option benefits from an increased focus on smaller sites, which are likely to be deliverable in the early part of the plan period (an important matter, as there would otherwise be a dip in the housing trajectory in the early part of the plan period, given a reliance on strategic sites).</li> <li>• Options 3 and 4 - Would involve a larger buffer, relative to Option 2; however, there would be an increased reliance on larger sites and hence there would be a likelihood of undersupply within the early part of the plan period.</li> <li>• Option 5 - The buffer would increase beyond that needed to ensure that Guildford's OAN can be met, meaning that land would be available to meet a proportion of unmet needs arising</li> </ul>							

from elsewhere within the HMA. N.B. Guildford Borough has not been formally asked by either of the two other authorities within the HMA to meet unmet needs arising from within their areas; however, it is apparent that there is a risk of undersupply.

- Options 6 and 7 - Would involve an increased buffer, and therefore land would be available to meet a higher proportion of Woking's unmet needs.
- Option 8 - Would involve an increased buffer, relative to Option 7, and therefore land would be available to meet a higher proportion of Woking's unmet needs. Assuming that meeting Guildford's own needs requires 'OAN + 10%', then planning for 'OAN + 26.7%' would mean planning to meet at least 69% of Woking's unmet need.<sup>63</sup>

In **conclusion**, higher growth options are to be supported, from a 'housing' perspective, given the importance of putting a buffer in place, in order to maximise the likelihood of Guildford delivering on its OAN figure, and given the likelihood of housing undersupply within the HMA.

There are other considerations – e.g. the need to ensure a robust housing trajectory ('five year land supply') across the whole plan period, the need to support larger (or, at least, 'more viable') sites where there is greatest potential to deliver a high percentage of affordable housing and the matter of delivering housing at locations within the borough where need is highest) - however, these are secondary issues for the purposes of this appraisal (given limited evidence, e.g. in relation to how housing needs vary within the borough).

Also, another consideration relates to provision for the accommodation needs of the Traveller community; however, there is no potential to differentiate the alternatives in this respect. All alternatives would provide for identified needs.

With regard to effect **significance**, it is fair to conclude that all alternatives would result in significant positive effects, as the Local Plan would provide for the OAHN figure assigned by the SHMA; however, it is recognised that under the lower growth options there is a risk of undersupply of housing within the HMA.

#### Minimise use of best and most versatile agricultural land and encourage contaminated land remediation

	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Rank	1	2	3	4	5	6	7	8
Significant effects?	Yes							
Discussion	<p>The 'Agricultural Land Classification Provisional (England)' dataset, available at <a href="http://magic.gov.uk">magic.gov.uk</a>, shows the majority of agricultural land in the borough to be 'grade 3', with some small patches of higher quality 'grade 2' land and notable areas of lower quality 'grade 4' and 'non-agricultural' land (e.g. areas associated with heathland commons, and the North Downs escarpment, are classified as 'non-agricultural'). However, this data-set is of a very low resolution (e.g. some relatively large villages are not even recognised as 'urban' on the map), and hence is not suitable for differentiating sites. Also, the dataset does not distinguish between 'grade 3a' and 'grade 3b', which is a notable omission given that the NPPF classifies 'best and most versatile' agricultural land as that which is either grade 1, grade 2 or grade 3a.</p> <p>The most reliable dataset is the 'Post 1988 Agricultural Land Classification (England) dataset, also available at <a href="http://magic.gov.uk">magic.gov.uk</a>, which is suitable for differentiating site options at the borough-</p>							

<sup>63</sup> Option 8 would involve providing for 2,080 homes over-and-above Option 1 (i.e. the option that meets Guildford's needs only though applying a 10% buffer). 2,080 homes represents 69% of Woking's unmet need figure (3,150). N.B. 69% is an 'at least' figure as Option 8 would involve additional small sites, hence the buffer needed to deliver Guildford's OAHN would be lower than 10%.

scale, and does distinguish between grade 3a and grade 3. However, because surveying land using the 'post 1988' criteria involves fieldwork, the data is very patchy. Within Guildford Borough the main area of land that has been surveyed is to the west of Guildford (including Blackwell Farm), finding primarily grade 3b and limited grade 3a and grade 2.

Also, there is the potential to undertake desk-top survey of specific sites, thereby reaching a conclusion on agricultural land quality (distinguishing between grade 3a and 3b), but without the certainty that comes from field survey. The Council commissioned such a desk-top study in 2016, which considered a number of the sites that are variables across the alternatives –

- Aldertons Farm (Options 2, 5, 6 and 8) = Grade 2 or 3a
- Land south of Tongham - Grade 3b
- Liddington Hall - Grade 3b
- Clandon Golf - Grade 3a (most) and 3b (northwest)

Taking account of both the low resolution national ('provisional') dataset, as well as the patchy higher resolution/accuracy dataset, the relative merits of the alternatives are as follows -

- Option 1 - performs well as it would involve the least amount of land-take; however, there would still be significant loss of 'best and most versatile' (BMV) agricultural land.
- Option 2 - would involve additional loss of BMV land at the Aldertons Farm site and potentially at other sites.
- Option 3 - would involve additional loss of agricultural land, over-and-above Options 1 and 2, through the additional extension to Tongham; however, this site does not comprise BMV.
- Option 4 - would involve additional loss of agricultural land, over-and-above Options 1, 2 and 3, at the Clandon Golf extension to Guildford; and the additional land lost would be BMV.
- Option 5 - would involve higher growth through the sites discussed under Options 2 and 3. It is judged to perform on a par with Option 4.
- Option 6 - would involve higher growth through the sites discussed under Options 2 and 4. It performs worse than Options 4 and 5.
- Option 7 - would involve higher growth through the sites discussed under Options 3 and 4. It performs worse than Option 6.
- Option 8 would involve the greatest loss of agricultural land, including BMV.

In **conclusion**, it is clear that Option 1 (lowest growth) is best performing, whilst Option 8 (highest growth) is worst performing. The degree of impact generally increases in-line with the quantum of growth, although not entirely due to the variability in agricultural land quality between sites.

With regard to effect **significance**, all options would result in significant loss of best and most versatile agricultural land, and hence significant negative effects, although all options would seek to maximise brownfield development.

Conserve and enhance landscape character								
Rank	1	2	3	4	5	6	7	8
Significant effects?	No	Yes						
	<p>Landscape was a major consideration (i.e. constraint) taken into account by the Council when developing reasonable alternatives (see discussion in Chapter 6, above), recognising that there is a need to avoid greenfield development within the AONB (which covers the southern half of the borough) and avoid loss of Green Belt (which covers 89 per cent of the borough), in particular Green Belt that is high sensitivity (i.e. contributes to the nationally established Green Belt purposes).<sup>64</sup> Also, there is land adjacent to the AONB that is currently designated as an Area of Great Landscape Value (AGLV), and which is also a significant constraint (particularly given a commitment by Natural England to undertake an AONB boundary review, and given an independent study that has identified candidate sites within Guildford to add to the AONB). Finally, there is a need to recognise that all landscapes within Guildford will have an identified character, with varying degrees of importance and sensitivity. A landscape character assessment (LCA) study does examine all landscape parcels in Guildford; however, there is limited potential to draw upon it for the purposes of this current appraisal. The LCA to a large extent seeks to guide the direction of future change or evolution through development or management, by indicating sensitivities that should be considered, and providing the most positive opportunities for change and minimising negative impact.</p> <p>The relative merits of the alternatives are as follows -</p> <ul style="list-style-type: none"><li>Option 1 would involve the least ‘land take’ and hence is clearly best performing from a landscape perspective; however, numerous sites under this option – i.e. sites that are a constant across all alternatives - will lead to a degree of landscape impact. Perhaps most notably, Blackwell Farm will impact upon AGLV and AONB (Blackwell Farm), albeit efforts have been made to limit impacts as far as possible.</li><li>Option 2 gives rise to some concerns over-and-above Option 1, with all four of the additional extension sites associated with a degree of landscape (or at least Green Belt) sensitivity. Most notably, Aaron’s Hill (Godalming) falls within the AGLV and comprises red-rated Green Belt. Hornhatch Farm (Chilworth) is also notable for lying adjacent to the AGLV, in close proximity to the AONB and comprising red-rated Green Belt. East of Glaziers Lane (Flexford) is not associated with a designated landscape; however, it is red-rated Green Belt and development would introduce development in depth to the north of the railway line, where currently there is only frontage development. Finally, Aldertons Farm (Send Marsh / Burnt Common) comprises amber-rated Green Belt, but is otherwise relatively unconstrained. Send Marsh falls within the Ockham and Clandon Woodland Rolling Countryside character area, which is an extensive area, with Send Marsh at its northern extent, identified as having ‘moderate’ condition and strength of character. The LCA references Send Marsh, stating: <i>“This looser, later form of disparate development dilutes the more typical local character of the area, as within Send and Send Marsh.”</i></li><li>Option 3 gives rise to concerns over-and-above Options 2, as the additional extension to Tongham – which would be delivered in place of the Option 2 sites - comprises AGLV. Also, the GBCS has established that this land does serve some Green Belt purposes (‘amber-</li></ul>							

<sup>64</sup> Green Belt is not technically a landscape designation. However, given the extent of Green Belt in Guildford (i.e. the choice is primarily between Green Belt sites, as opposed to Green Belt sites versus sites within the countryside beyond the Green Belt), and give the fact that all Green Belt parcels have been classified according to sensitivity (i.e. a parcel is sensitive where it contributes to Green Belt purposes), it is possible and helpful to take account of Green Belt sensitivity.



rated', i.e. medium sensitivity).

- Option 4 gives rise to concerns over-and-above Option 3, as this option would involve allocation of Clandon Golf, which comprises red-rated Green Belt and AGLV (and borders the AONB). Having said this, it is noted that the LCA does not reference this golf course as a particular asset within the Merrow and Clandon Wooded Chalk Downs character area, whilst it does reference nearby Guildford Golf Course (Merrow Downs) as characteristic.
- Option 5 - would involve higher growth through the sites discussed under Options 2 and 3. It is judged to perform on a par with Option 4.
- Option 6 - would involve higher growth through the sites discussed under Options 2 and 4. It performs worse than Options 4 and 5.
- Option 7 - would involve higher growth through the sites discussed under Options 3 and 4. It performs worse than Option 6.
- Option 8 is a high growth option that would involve greatest landscape impacts.

In **conclusion**, it is clear that Option 1 (lowest growth) is best performing, whilst Option 8 (highest growth) is worst performing. The degree of impact increases in-line with the quantum of growth supported.

With regard to effect **significance**, it is appropriate to conclude that Options 2 – 8 would lead to significant negative effects, as there would be impacts to AONB and/or AGLV. It is recognised that Option 1 sites would result in some impact to AGLV and AONB (Blackwell Farm); however, efforts have been made to limit impacts as far as possible. Notably, the extent of Blackwell Farm has been reduced since the 2014 Draft Plan proposal, in that the site now only intersects the AGLV to a very small extent (albeit development will necessitate widening of an access road through AGLV and AONB).

#### Reduce poverty and social exclusion for all sectors of the community

	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Rank	=	=	=	=	=	=	=	=
Significant effects?	No							
Discussion	<p>The sustainability objective here is to “<i>Reduce poverty and social exclusion for all sectors of the community</i>”, an objective that overlaps considerably with a number of other sustainability objectives including those relating to ‘Communities’, ‘Health’ and ‘Housing’. Given the need to avoid overlap and repetition, there is no potential to differentiate the alternatives in terms of ‘Poverty and social exclusion’. This conclusion is reached recognising that the following issues do not enable differentiation of the alternatives -</p> <ul style="list-style-type: none"> <li>• Whilst the Index of Multiple Deprivation (IMD) dataset shows there to be some areas of relative deprivation within Guildford, only one ‘output area’ (in the Park Barn / Westborough to the west of Guildford town centre) is within the bottom 20% of output areas nationally, and it is not clear that any of the greenfield allocations will directly support regeneration initiatives. The Aaron’s Hill output area in neighbouring Waverley Borough is also relevant, in that it is relatively deprived and an extension site is under consideration here; however, the output area is not within the bottom 20% of output areas nationally.</li> <li>• All alternatives would provide for the identified accommodation needs of the Traveller community.</li> </ul> <p>In <b>conclusion</b>, it is not possible to differentiate the alternatives. With regard to effect <b>significance</b>, it is possible to conclude that any effects are likely to be relatively minor.</p>							



### Make the best use of **previously developed land** and existing buildings

			Option 3					
Rank	=	=	=	=	=	=	=	=
Significant effects?	No							
Discussion	<p>All of the sites that are variable across the alternatives are greenfield sites, and so there is an argument to suggest that the alternatives should be ranked according to the quantum of growth. However, if consideration is given to effects at the 'larger than local' scale this argument is not persuasive, i.e. under Option 1 there is the potential for there to be unmet needs that are eventually provided for at greenfield locations rather than at</p> <p>In <b>conclusion</b>, impacts are correlated with growth quantum. With regards to <b>significance</b>, significant negative effects are not predicted. All options would involve capitalising on development opportunities within the existing urban area, and also allocating Wisley Airfield, a significant proportion of which is brownfield.</p>							

### Enhance the borough's rural economy

	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Rank	=	=	=	=	=	=	=	=
Significant effects?	No							
Discussion	<p>Of the site options that are a focus of this current alternatives appraisal, i.e. those that are a variable across the alternatives, none are located in particularly rural locations, i.e. all are associated with a village or town. There are not likely to be implications for the rural economy.</p> <p>In <b>conclusion</b>, it is not possible to differentiate the alternatives. With regards to <b>significance</b>, significant effects are not predicted. All options would involve a new settlement in a rural location (away from a village) at Wisley Airfield; however, it is difficult to conclude how it might impact on the rural economy. On the one hand, employment space, jobs and a new local centre will be created, but on the other hand traffic on rural roads can impact on businesses. Wisley Airfield is surrounded by a number of villages without a local centre, that will benefit from access to a new local centre; however, it does not seem that any of the surrounding villages are particularly isolated (e.g. Ockham has access to Ripley District Centre and East Horsley Local Centre). The hamlets to the east of Wisley Airfield are perhaps most 'rural'.</p>							

Create and maintain <b>safer and more secure</b> communities								
	Option 1						Option 7	OAN + 26.2%
Rank	=	=	=	=	=	=	=	=
Significant effects?	No							
Discussion	<p>Of the site options that are a focus of this current alternatives appraisal, i.e. those that are a variable across the alternatives, all are concerned with creating new communities rather than redeveloping urban areas / regenerating existing communities. Whilst it is fair to say that new communities will enhance the vitality of adjacent/nearby communities, it is not possible to draw conclusions in relation to safety/security. Another issue locally is pedestrian, cyclist and road traffic; however, it is again not possible to draw strong conclusions (see additional discussion below, under 'Transport').</p> <p>In <b>conclusion</b>, it is not possible to differentiate the alternatives. With regards to <b>significance</b>, significant effects are not predicted. It is not clear that the spatial strategy will lead to significant improvements, in terms of safe and secure communities.</p>							

Minimise journey lengths and encourage use of sustainable forms of <b>transport</b> (walking, cycling, bus, rail)								
	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Rank	★ 1	2	2	2	3	3	3	4
Significant effects?	No							Yes
Discussion	<p>Traffic is a key issue locally, both on strategic and local roads (where a range of 'hotspots' have been identified); hence growth options must be scrutinised in terms of the potential to support modal shift (i.e. walking cycling and use of public transport, rather than reliance on the private car), minimise worsened traffic along key routes and at key junctions and deliver required upgrades to transport infrastructure.</p> <p>The relative merits of the alternatives are as follows -</p> <ul style="list-style-type: none"> <li>Option 1 - A low growth option and therefore performs relatively well, given that Guildford is a constrained location (certainly in the regional context, and potentially in the sub-regional context; albeit it is recognised that parts of Waverley - including the Dunsfold Aerodrome site that is under consideration for significant growth - are not well connected). A number of strategic sites under this option – i.e. sites that are a constant across the alternatives - should act to support the achievement of transport objectives; most notably, urban extensions to Guildford at Blackwell Farm and Gosden Hill, which will support delivery of two new rail stations and more generally a 'sustainable movement corridor' through Guildford. However, Wisley Airfield performs less well, as a relatively isolated location. It is recognised that the scale of the scheme would enable good potential to provide a high quality bus service in perpetuity and deliver some cycle route improvements to important destinations, and it is recognised that the orientation of the Guildford Sustainable Movement Corridor supports growth at Wisley; however, relatively high car dependency can still be anticipated.</li> <li>Option 2 – Leads to concerns over-and-above Option 1. The additional urban extension sites are fairly well located in some respects - with one located adjacent to a train station,</li> </ul>							

another located close to a train station, another located on the edge of Godalming and the fourth located close to employment allocations (Send Marsh / Burnt Common and Gosden Hill Farm) – however, a degree of car dependency can be anticipated. There could be a risk of the additional extension at Send Marsh / Burnt Common (Alderton's Farm) contributing to in combination effects in the Send area, recognising that the extension would be in addition to several other proposed schemes, including the nearby Garlick's Arch scheme.

- Option 3 – An additional extension to Tongham would be delivered, in place of the extension sites discussed under Option 2. The Tongham site is not particularly well located from a perspective of wishing to encourage modal shift, but equally is not known to be associated with any particular transport issues. On balance, this option performs as per Option 2. It would involve only marginally higher growth.
- Option 4 – A large extension to the south east of Guildford, at Clandon Golf, would be delivered, in place of the sites discussed under Options 2 and 3. Clandon Golf is distant from the town centre, and is not within the Sustainable Movement Corridor; however, there would be the potential to support and enhance the adjacent Park and Ride. On balance, this option is judged to perform as per Option 3. It would involve higher growth, but the Clandon Golf site has some locational merit, relative to the Tongham site.
- Option 5 - would involve higher growth through the sites discussed under Options 2 and 3. Higher growth leads to additional transport concerns.
- Option 6 - would involve higher growth through the sites discussed under Options 2 and 4. Higher growth leads to additional transport concerns.
- Option 7 - would involve higher growth through the sites discussed under Options 3 and 4. Higher growth leads to additional transport concerns.
- Option 8 is a high growth option that leads to concerns in terms of traffic congestion.

In **conclusion**, it is clear that Option 1 (lowest growth) is best performing, whilst Option 8 (highest growth) is worst performing. The degree of impact generally increases in-line with the quantum of growth, although not entirely due to the sites varying in terms of transport constraint / opportunity (in terms of support for modal shift and/or traffic congestion).

With regard to effect **significance**, there is confidence that Option 1 would not lead to significant negative effects, given the findings of the Strategic Highway Assessment Report (2016). Higher growth options have not been subjected to transport modelling, and so there is no certainty regarding the potential for 'a severe impact on the local and strategic highway network'; however, it is appropriate to 'flag' a particular risk under Option 8.

#### Reduce **waste** generation and achieve the sustainable management of waste

	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Rank	N/a							
Significant effects?								
Discussion	This objective is <b>not applicable</b> to the current appraisal. It should be possible to manage waste sustainably under any reasonably foreseeable scenario.							

# Maintain and improve the **water** quality... and achieve sustainable water resources management

Rank	1	1	2	1	2	1	2	2
Significant effects?	No							
	<p>Water quality and resource issues locally are discussed within the Guildford borough 'Environmental Sustainability and Climate Change study'. The study explains that the South East is a region that experiences serious water stress, with the European Environment Agency classifying the South East and London among areas in the EU with the least available water per person. Furthermore, Thames Water's Draft Water Management Plan 2015-2040 is clear that the situation could get worse, particularly given that the London zone deficit is predicted to increase from 35 to 367 megalitres per day; and also given increased water demand from bathing, watering of gardens and from cooling systems.</p> <p>However, having made these points, it is not clear that it is possible to draw the conclusion that lower growth in Guildford is to be supported from a water resources perspective. This is on the basis that any unmet housing need will have to be met somewhere locally, and other authorities are constrained to an equal or similar extent.</p> <p>With regards to water quality, it is not clear that there are any sensitivities associated with the site options in question that would enable the alternative scenarios to be differentiated. No <i>major</i> waste water infrastructure 'pinch points' are known of, albeit Thames Water made the following comment through representations in 2016:</p> <p><i>"Water treatment and wastewater/sewage treatment capacity maybe a constraint in some catchments within the Guildford Borough area. As the Local Plan is finalised we will be reviewing which of our treatment sites need upgrades to accommodate the growth and we are willing to have a meeting with the Council to discuss this."</i></p> <p>Thames Water's consultation response from 2014 was along similar lines -</p> <p><i>"We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development."</i></p> <p>A recently completed Water Quality Assessment has found that the Ash Vale Wastewater Treatment Works (WwTW) in the west of the borough has limited capacity to receive additional wastewater, potentially constraining spatial strategy options 3, 5, 7, 8; however, the study concludes that it should be possible to increase the capacity of the WwTW. It is also perhaps notable that the concentration of growth in the Ash/Tongham area under options 3, 5, 7 and 8 (recognising the extent of housing that is a 'given' across all alternatives) could lead to challenges in respect of managing surface water runoff through sustainable drainage systems.</p> <p>In <b>conclusion</b>, it is appropriate to 'flag' the possibility of options 3, 5, 7 and 8 performing less well, but with much uncertainty. It should be possible to deal with water issues at the development management stage. With regard to effect <b>significance</b>, significant negative effects are not predicted.</p>							

## Summary spatial strategy alternatives appraisal findings

Topic	Rank of performance / categorisation of effects							
	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Biodiversity	★1	2	2	3	3	6	6	7
Climate change	4	4	3	2	3	2	★1	★1
Communities	★1	2	2	★1	3	3	3	4
Economy	8	7	6	5	4	3	2	★1
Employment	2	5	5	★1	5	3	3	4
Flooding	★1	2	★1	★1	2	2	★1	2
Health	=	=	=	=	=	=	=	=
Historic environment	★1	2	3	4	4	5	6	7
Housing	8	7	6	5	4	3	2	★1
Land	★1	2	3	4	5	6	7	8
Landscape	★1	2	3	4	5	6	7	8
Poverty	=	=	=	=	=	=	=	=
Brownfield	=	=	=	=	=	=	=	=
Rural	=	=	=	=	=	=	=	=
Safety	=	=	=	=	=	=	=	=
Transport	★1	2	2	2	3	3	3	4
Water	★1	★1	2	★1	2	★1	2	2

Topic	Rank of performance / categorisation of effects							
	Option 1 OAN + 10%	Option 2 OAN + 14%	Option 3 OAN + 15%	Option 4 OAN + 18%	Option 5 OAN + 19%	Option 6 OAN + 22%	Option 7 OAN + 23%	Option 8 OAN + 27%
<p>All options are associated with pros and cons. Option 1 is notable for performing best in terms of a several sustainability topics; however, the appraisal also serves to indicate some draw-backs to this option.</p> <p>Taking notable topics in turn -</p> <ul style="list-style-type: none"> <li>• Biodiversity – It is fair to conclude that lower growth is supported, albeit lower growth could potentially lead to unmet needs that must be met elsewhere within the heavily constrained sub-region.</li> <li>• Climate change – Most higher growth options perform relatively well, as additional housing would be delivered at one or more strategic-scale schemes, where there would be the potential to fund/deliver low carbon infrastructure and/or achieve ambitious standards of energy efficiency.</li> <li>• Communities – Only higher growth options involving an additional extension to Guildford at ‘Clandon Golf’ are supported, as this is a large scheme that would deliver new/upgraded strategic community infrastructure.</li> <li>• Economy - The Strategic Housing Market Assessment (SHMA) is clear that housing under-delivery within the West Surrey Housing Market Area (HMA), which is also a Functional Economic Market Area (FEMA), could result in economic growth opportunities going unrealised; hence options not making a contribution to meeting Woking’s unmet housing need perform less well.</li> <li>• Employment – Only higher growth options involving an additional extension to Guildford at ‘Clandon Golf’ are supported, as this is a large scheme that would deliver new (limited) employment land. Higher housing growth aligned with higher employment growth is to be supported at Guildford, from a pure national/regional economic growth perspective (leaving aside other considerations, e.g. traffic).</li> <li>• Flooding – Some of the sites that would be delivered under certain higher growth options are associated with a minor flood risk constraint. It is likely that risk can be avoided in practice.</li> <li>• Historic environment - the degree of impact generally increases in-line with the quantum of growth, although the correlation is not entirely linear, as there is an instance of an option involving only marginally higher growth with the additional housing at a less constrained site.</li> <li>• Housing - Higher growth options are to be supported given the importance of putting a buffer in place, in order to maximise the likelihood of Guildford delivering on its Objectively Assessed Housing Need (OAHN) figure, and given the likelihood of housing undersupply within the HMA (arising from Woking). High growth options would involve making a contribution to meeting unmet needs within the HMA.</li> <li>• Land - all options would result in significant loss of best and most versatile agricultural land, and hence significant negative effects, although all options would maximise brownfield development.</li> <li>• Landscape – Most sites that come into contention under higher growth options are constrained, and so the degree of impact increases in-line with the quantum of growth supported.</li> <li>• Transport - The degree of impact generally increases in-line with the quantum of growth, although not entirely due to the sites varying in terms of transport constraint / opportunity (in terms of support for modal shift and/or traffic congestion). With regard to effect significance, there is confidence that Option 1 would not lead to significant negative effects, given the findings of the Strategic Highway Assessment Report (2016). Higher growth options have not been subjected to transport modelling, and so there is no certainty regarding the potential for ‘a severe impact on the local and strategic highway network’; however, it is appropriate to ‘flag’ the risk of significant negative effects under Option 8.</li> <li>• Water - A recent Water Quality Assessment has found that the Ash Vale Wastewater Treatment Works (WwTW) in the west of the borough has limited capacity to receive additional wastewater, potentially constraining spatial strategy options 3, 5, 7, 8, which would see additional growth at Ash/Tongham; however, the study concludes that it should be possible to increase the capacity of the WwTW.</li> </ul> <p>The intention is for the Council and stakeholders to take these findings into account when considering how best to ‘trade-off’ between competing objectives, and establish the ‘most sustainable’ option.</p>								