

Sustainability Appraisal (SA) of the Guildford Borough Local Plan

SA Report Addendum

September 2018

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1 INTRODUCTION

1.1 Background

- 1.1.1 The Guildford Local Plan was submitted to the Secretary of State for Housing, Communities and Local Government, for examination by an appointed Planning Inspector, on 13th December 2017. Examination hearings sessions were held in June and July 2018.
- 1.1.2 A key outcome of hearing sessions was an understanding that there is a need for the Local Plan to allocate one or more additional sites, sufficient to provide for c.550 homes within the first five years following plan adoption, in order for the plan to be found 'sound' by the Planning Inspector.
- 1.1.3 Work to consider additional site allocations was subsequently undertaken, and the conclusions agreed by Executive on 4 September 2018. Conclusions are reflected in a set of proposed main modifications (henceforth *proposed modifications*),¹ which are published for consultation at the current time.

1.2 This SA Report Addendum

- 1.2.1 The Local Plan is being developed alongside a process of **Sustainability Appraisal (SA)**, a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.
- 1.2.2 The aim of **this SA Report Addendum** is essentially to present information on the proposed modifications, and alternatives, with a view to informing the current consultation and subsequent plan finalisation.

Structure of this report

- 1.2.3 In order to achieve this aim, this SA Report Addendum sets out to answer three questions:
1. What has plan-making / SA involved up to this point?
 - particularly in terms of the consideration given to reasonable alternatives.
 1. What are the SA findings at this stage?
 - i.e. in relation to proposed modifications.
 2. What happens next?

N.B. This report is known as an SA Report 'Addendum' on the basis that it is an Addendum to the SA Report Update published/submitted in 2017 (which itself was an update to the SA Report published in 2016). The focus of this report is proposed modifications, as opposed to the plan as a whole (the remit of the SA Report).²

¹ As well as proposed *main* modifications, the Council has also prepared a list of proposed *additional* modifications; however, proposed additional modifications need not be a focus of SA, as by their very nature they are minor edits (e.g. correcting typos) and hence do not lead to the potential for significant effects.

² Whilst the focus of this report is on proposed modifications (and alternatives), there is a need to bear in mind that the proposed modifications will (if taken forward) be implemented alongside the rest of the Local Plan, i.e. those parts of the plan not set to be modified. For this reason, explicit consideration is also given to the effects of the Local Plan as modified (i.e. the cumulative effects of the proposed modifications and the rest of the Local Plan as submitted).

2 WHAT IS THE PLAN SEEKING TO ACHIEVE

2.1.1 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.

2.1.2 The Local Plan will be in general conformity with the National Planning Policy Framework (NPPF),³ 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 and agencies such as Surrey County Council and Highways England.

2.1.3 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 areas designated as Thames Basin Heaths Special Protection Area (**TBHSPA**), Special Areas of Conservation (**SAC**), Sites of Special Scientific Interest (**SSSI**) and Areas of Outstanding Natural Beauty (**AONB**) 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.

2.2 What is the Local Plan not seeking to achieve?

2.2.1 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.

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

³ N.B. the Local Plan is being examined 'under' the NPPF 2012, and not the NPPF 2018.

3 WHAT’S THE SCOPE OF THE SA?

3.1.1 The scope of SA work, with respect to the Guildford Local Plan, is introduced within the SA Report Update 2017. Essentially, the scope is reflected in a list of sustainability objectives, which collectively provide a methodological ‘framework’ for appraisal - see **Table 3.1**.

Table 3.1: The SA framework

Sustainability objectives	Sustainability issues
1. Maintain, conserve and	Large areas of the borough are covered by biodiversity designations , including internationally important SPAs / SACs, nationally important SSSIs, locally important SNCIs and ancient woodland.
	Target conservation efforts within the landscape scale biodiversity opportunity areas promoted by the Surrey Nature Partnership.
	Provide opportunities for countryside recreation and access whilst respecting its landscape quality and avoiding conflicts.
2. Mitigate climate change through reducing emissions of greenhouse gases	Government policy requires new development to promote sustainable construction, energy conservation and renewable energy .
3. Create and sustain vibrant communities	Catering for population growth in the short-term with its associated social, economic and environmental consequences.
	Age shifts will have long term implications for health care needs, housing mix and other social services.
	Give due regard to promoting equality of opportunity for all protected groups , e.g. the elderly. ⁴
4. Maintain Guildford borough and Guildford town’s competitive economic role	Support Growth Town objectives, in line with the Enterprise M3 Local Enterprise Partnership’s Strategy Economic Plan.
	The high cost of housing prevents essential workers from living in much of the borough, affecting the ability of businesses to recruit.
5. Facilitate employment development opportunities to meet the changing needs of the economy	Maintain a diverse and targeted supply of employment land , suited to the local workforce and recognising the changing needs of business.
6. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	Heavier rainfall in winter will increase hazards arising from fluvial flooding and the number of properties that are at risk from flooding will increase. Surface water flooding will increase as a result of more frequent storms (given climate change).
7. Facilitate improved health and well-being 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 longevity .
	Obesity in the county is increasing. Provision of adequate sports and leisure facilities to encourage more active lifestyles should be regarded as an important component of community infrastructure.
8. Protect, enhance, and make accessible, the archaeological and historic environments and cultural assets of Guildford, for the benefit of residents and visitors	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 distinct place .

⁴ 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
	<p>High average house prices create affordability problems for local people, first time buyers and essential workers.</p>
<p>10. Minimise use of best and most versatile agricultural land and encourage the remediation of contaminated land</p>	<p>Contamination issues may arise on previously developed sites.</p>
<p>11. Conserve and enhance landscape character</p>	<p>Development pressures, fuelled by high land and property prices, pose threats to landscape interests.</p>
<p>12. Reduce poverty and social exclusion for all sectors of the community</p>	<p>Address pockets of deprivation, recognising that the index of multiple deprivation dataset shows some notable increases in variation.</p> <p>There are a significant number of adults with no qualifications.</p>
<p>13. Make the best use of previously developed land and existing buildings</p>	
<p>14. Enhance the borough’s rural economy</p>	<p>There is a need to support agriculture and other rural businesses; and also a need to support affordable housing in villages.</p>
<p>15. Create and maintain safer and more secure communities</p>	<p>Address occurrences and the perception of crime.</p> <p>Ensure the safety of pedestrians and cyclists.</p>
	<p>For those without a car, access to facilities in rural areas is an issue.</p>
<p>17. Reduce waste generation and achieve the sustainable management of waste</p>	

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

4 INTRODUCTION (TO PART 1)

4.1.1 The Local Plan-making / SA process has been ongoing for a number of years, as explained within Part 1 of the 2017 SA Report Update.

4.1.2 At the current time, rather than recap the whole story, there is a need to explain the work undertaken in July/August 2018, subsequent to examination hearings and written correspondence with the Inspector,⁵ which led to the development of proposed modifications.

4.1.3 Specifically, in-line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise **reasonable alternatives**, and how the Council then took into account alternatives appraisal findings when determining a preferred approach.

4.1.4 More specifically still, the focus here is on reasonable alternative approaches to the allocation of additional land to deliver c.550 homes in the first five years, henceforth referred to as '**additional housing scenarios**'. As discussed above (para 1.1.2) allocation of land for additional housing is the central matter to be addressed through proposed modifications.

N.B. it is important to state clearly that the task is to allocate one or more additional sites, i.e. one or more sites *over-and-above* the allocations included within the submission Local Plan. The task is not to consider removing or replacing any of the submission allocations. The Inspector has not indicated the need to consider doing so.

Structure of this Part of the report

4.1.5 This part of the report is structured as follows -

Chapter 5 - explains the reasons for **selecting the alternatives** dealt with

Chapter 6 - presents an **appraisal** of the reasonable alternatives

Chapter 7 - explains reasons for **selecting the preferred option**

Who's responsibility?

4.1.6 It is important to be clear that -

- Selecting reasonable alternatives - is the responsibility of the plan-maker (GBC), with AECOM acting in an advisory capacity.
- Appraising the reasonable alternatives - is the responsibility of AECOM.
- Selecting the preferred option - is the responsibility of the plan-maker (GBC).

⁵ See <https://www.guildford.gov.uk/newlocalplan/examination>. In particular, see examination documents ID-006 and GBC-LPSS-020.

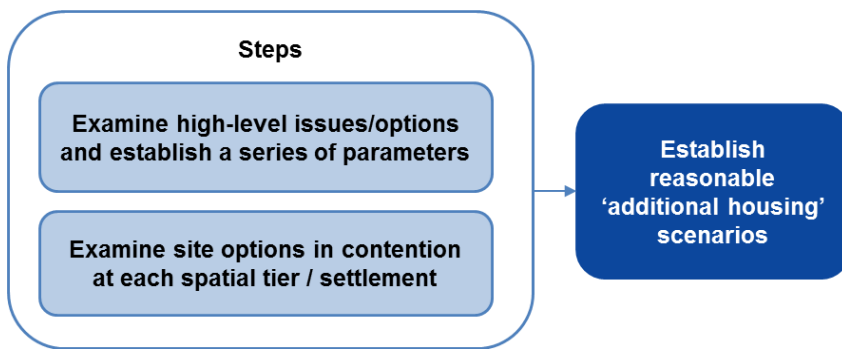
5 SELECTING REASONABLE ALTERNATIVES

5.1 Introduction

5.1.1 The aim here is to explain the work undertaken in July/August 2018 to establish additional housing scenarios for appraisal and consultation.

5.1.2 As summarised in **Figure 5.1**, work involved: **1)** examining high-level issues/options and in turn establishing a series of broad parameters to guide the selection of scenarios; and then **2)** examining the site options in contention for allocation at each of the spatial tiers / settlements within Guildford Borough; before **3)** drawing upon this understanding to identify additional housing scenarios.

Figure 5.1: Establishing reasonable additional housing scenarios



5.2 High-level issues / options / parameters

Introduction

5.2.1 This section presents a discussion of high-level issues and options, which led to a set of parameters, or principles, to guide the subsequent examination of site options, and ultimately the selection of additional housing scenarios. The following topics are considered in turn -

- Housing target and trajectory
- Spatial strategy
- Conclusions

Housing target and trajectory

5.2.2 The Inspector’s Guidance Note ID-6 considers objectively assessed housing needs (OAHN) for Guildford Borough, unmet needs arising from Woking Borough and the required housing trajectory, before arriving at a conclusion on a housing target, and the required delivery trajectory, for the plan period. Conclusions within the Inspector’s note were then updated verbally, following discussions during a dedicated examination hearing session on ‘Boosting housing supply and early years provision’ held on 3rd July.

5.2.3 In respect of **OAHN**, ID-6 considers: A) unaffordability (“very high and continues to worsen”); B) continuing employment growth (“The [submission] assumption of 0.7% pa thus appears on the low side and I consider that a realistic and cautious approach would be to assume employment growth of 0.8% pa...”); and then C) student housing (“23 dpa is required to compensate for... predicted further incursion of students into the housing market...”), before concluding that -

“Together, these point towards an OAN of 630 dpa. This represents a considerable uplift over the demographic starting point of 422 dpa. It is based on an approach which addresses known factors which are putting pressure on the housing market, and seeks to quantify the extent of those pressures and compensate for them. In my view it is an appropriate adjustment for market signals.”

- 5.2.4 In respect of **unmet needs**, the Inspector, within ID-6, explains that: *“Local authorities should meet objectively assessed housing need in their housing market areas. An allowance should therefore be made for unmet need in Woking, which is in the same housing market area, but this needs to be tempered by the recognition that the plan already releases areas from the Green Belt for strategic housing allocations. This was not the case in Waverley, where Green Belt release was more local in nature. There is also evidence that the de facto residual level of unmet need from Woking may be lower than indicated by the SHMA as a result of lower household projections. This was recognised in the Waverley Local Plan report. For these reasons I would not expect Guildford to take 50% of Woking’s 2015 SHMA-based unmet need, but it should seek to accommodate a meaningful amount, of around 25% (787 dwellings).”*
- 5.2.5 In respect of the required **housing trajectory**, ID-6 states at para. 14 that: A) the ‘Liverpool method’,⁶ as proposed by the Council in the submission plan, is acceptable; but that B) the proposed stepped trajectory is not acceptable, i.e. a smooth housing trajectory is necessary (because it reflects a more positive approach to addressing worsening affordability, and boosting housing supply).
- 5.2.6 ID-6 then **concludes** that the combination of OAN (630 dpa) and unmet needs (41 dpa) leads to a housing target of 671 dpa. This compares to the housing target of 654 dpa within the submission plan, which was set in-line with the understanding of OAHN at that time (i.e. the submission plan did not make any provision for unmet needs). The implication of committing to this target and a smooth trajectory (with the Liverpool method applied to undersupply since the start of the plan period) is discussed in ID-6 as follows: *“Taking the Council’s own supply figures, on the basis of a level trajectory and the Liverpool methodology, the plan would not provide a five year supply at either the 2018 or the 2019 base dates at 671 dpa, or even at its published figure of 654 dpa... [hence] the Council should... identify additional sources of housing delivery in the early years of the Plan...”* The implication is that the Council should identify additional sources of supply (new allocations and/or additional supply from submission allocations) to deliver within the early years of the plan, with a view to ensuring that the Council has a robust five year supply at plan adoption, and is able to roll this forward.
- 5.2.7 However, an **updated conclusion** was then arrived at verbally, during the hearing session on 3rd July. During the hearings session the Council proposed a number of options, specifically the alternative targets/trajectories presented across appendices 5 to 6 of GBC-20 (a note prepared by the Council ahead of the 3rd July hearings), with the Inspector accepting the target/trajectory presented in Appendix 5 as sound. This trajectory involves a housing target of 630 dpa for the four years pre-adoption, and then a target of 672 dpa for the 15 years post adoption, with a smooth trajectory and the Liverpool method applied. In total this meets 20% of Woking’s unmet need.

Spatial strategy

- 5.2.8 There is a need to discuss: **A)** the established broad spatial strategy, as reflected within the submission plan; **B)** the specific additional guidance provided by the Inspector within ID-6; and then **C)** spatial strategy considerations specific to the matter of establishing additional housing scenarios.

⁶ This is one of two nationally accepted approaches to dealing with undersupply that has accrued since the start of the plan period. Under the Liverpool method the undersupply can be made good across the remainder of the plan period (as opposed to the more stringent Sedgefield method, whereby the undersupply is made good within the first five years post adoption). The Inspector’s reasons for supporting the Liverpool Method in this case are as follows: *“I am prepared to accept that the Liverpool methodology on its own is valid, given the scale of the strategic allocations and the infrastructure issues associated with them.”*

5.2.9 In respect of **(A)**, there is a need to explain the broad spatial strategy that is reflected within the submission plan, noting that additional housing scenarios that do not accord with this strategy can be dismissed as unreasonable. The strategy can be explained as follows -

First and foremost the strategy reflects an understanding that there is a hierarchy of places / potential growth locations within the Borough, and that a sequential approach to allocating development sites must be followed. In other words, capacity should be fully utilised at the most suitable sites (e.g. town centre sites), before moving down to the next tier in the hierarchy, and so on until a residual amount of growth is left to be delivered at sites in the bottom tier, namely village Green Belt sites, which tend to be less suitable for development.

However, the strategy also reflects an understanding that there must be flexibility to deviate from a strict sequential approach, in response to the many issues that can serve to complicate the question of development site suitability. In practice, this means that there can be a need to pass over allocating a site in one tier of the hierarchy, in favour of allocating a more suitable site in a lower tier. Factors that influence development site suitability, unrelated to location in the hierarchy, include (but are not limited to) -

- timescales for delivery (see discussion above, under 'trajectory');
- constraints, e.g. in relation to AONB, SPA, flooding, heritage, biodiversity;
- reliance upon, or ability to facilitate provision of, essential infrastructure; and
- policy constraint, e.g. Green Belt sensitivity.

5.2.10 In respect of **(B)**, the Inspector provided the following additional guidance on spatial strategy within ID-6: *"If new site allocations are required for this purpose they will need to be in locations that are not dependent on the completion of the A3 RIS which is not due until 2027 at the earliest. From evidence submitted to the examination so far, I am not convinced that such sites do not exist, or that they would fundamentally alter the spatial strategy."*

5.2.11 In respect of **(C)**, the Council considers that additional housing scenarios, in order to be considered reasonable, must be robust in five year housing land supply terms, i.e. scenarios that would involve a higher risk of losing five year housing land supply, can be dismissed as unreasonable. Maintenance of a five year supply is of crucial importance to the Council, as without a five year supply the plan will be deemed out of date, and the Council may, in turn, struggle to defend the Borough against planning applications that do not accord with the plan. The implications are that additional supply must be -

- delivered across a package of sites, as reliance on one site would create a risk that the five year supply might be lost, should that one site not deliver as anticipated;
- geographically spread, again to minimise the risk of unanticipated delays to delivery;⁷ and
- at locations where delivery is not dependent on prior delivery of new or upgraded infrastructure, the timing of which is outside the Council's control.

Conclusions on parameters

5.2.12 In conclusion, in seeking to identify potential additional sources of supply, to feed into the establishment of additional housing scenarios, the discussion presented above leads to the following list of parameters -

- There is a need to identify packages of sites to deliver **550 homes** in the first five years of the plan period. Packages of sites with a total yield significantly above this figure can be ruled-out as unreasonable. Equally, there is no need to consider packages with a total yield (within the first five years) significantly above 550 homes, as contingency for non-delivery (as there will be confidence regarding the delivery timescales of the sites that are taken forward).

⁷ Whilst the risk may be low, and is admittedly unquantified, the Council believes that smaller scale (settlement specific) housing markets do exist, such that there can be a degree of local market saturation, leading to developers delaying site delivery.

- In order to **minimise risk** of delays to site delivery leading to a problem in respect of five year supply, there is a need to examine packages of sites only, i.e. the option of providing for additional supply at a single large site can be ruled-out as unreasonable. Furthermore, site packages should be geographically spread, which in practice means not concentrated at one single lower tier settlement, and not overly dependent on new infrastructure delivery.
- There is a need to **accord with the spatial strategy** (see para 5.2.9) as far as possible, which in practice means seeking to avoid additional supply at Green Belt sites around villages; however, in practice this is a challenge, given a need to balance competing objectives (e.g. whilst larger extensions to main settlements accord with the spatial strategy, they may also tend to be associated with a degree of delivery risk). This matter is explored further below.

5.3 Site options at each spatial tier / settlement

- 5.3.1 Having considered high-level issues/options with a bearing on the establishment of additional housing scenarios (i.e. 'top down' understanding), the next step is to examine the site options that are feasibly in contention for allocation at the current time (i.e. 'bottom-up' understanding). Site options can be thought of as the building-blocks for establishing the scenarios.
- 5.3.2 As per the approach taken within the SA Report (2016) and the SA Report Update (2017),⁸ the discussion of site options is structured under a series of spatial 'tier' headings, where each tier represents a broad type of place / potential location for growth within Guildford Borough. The suitability of sites in lower tiers will *tend to be* lower than the suitability of sites in higher tiers; however, there is not a simple, direct correlation between tier and suitability (see para 5.2.9). This matter is discussed further below, with reference to practical examples.
- 5.3.3 There is also a need to provide a further note on methodology - see **Box 5.1**.

Box 5.1: Methodological note on examining site options in isolation

Firstly, there is a need to re-emphasise the matter already outlined above at paras 4.1.4 and 5.1.2, namely that the reasonable alternatives, at the current time, comprise additional housing scenarios, i.e. alternative packages of site options, where each package would provide the required quantum of homes, and align with wider strategic objectives/parameters, with examination of individual site options undertaken as a means to the end of arriving at reasonable alternatives (see Figure 5.1).⁹ The aim is to contribute to "*an outline of the reasons for selecting the alternatives dealt with*" (emphasis added). It is a different level of analysis to the appraisal of reasonable alternatives, with implications for the methodological approach that is **proportionate**.

Secondly, there is a need to comment on the role of sites **GIS analysis**. Appendix IV of the 2017 SA Report Update presented GIS analysis of site options;¹⁰ however, that analysis was not updated in 2018 for the purposes of establishing additional housing scenarios.¹¹ The 2017 analysis was borne in mind when examining site options in 2018, but in the knowledge of limitations, e.g. several sites have been reduced in extent since the 2017 GIS analysis was completed.

Thirdly, there is a need to re-emphasise the roles and **responsibilities** outlined at para 4.1.6. Establishing reasonable alternatives, and "*an outline of the reasons for selecting the alternatives dealt with*" (emphasis added), is the responsibility of the Council, albeit AECOM is well placed to advise.

⁸ In fact, the tiered / sequential approach to considering spatial strategy was first proposed in the 2013 Issues and Options consultation document, and then subsequently applied within the 2014 Draft Plan / Interim SA Report.

⁹ A site option is not a 'reasonable alternative', in the context of a Local Plan, where there is no understanding of how the site option in question would be delivered in combination with other sites, and noting that it is the central objective of all Local Plans to deliver a package of sites *in combination*. If a site option is presented without an explanation of how it would be delivered in combination with other sites (e.g. "in addition to sites X, Y and Z"; or "in place of site X") then the choice remains essentially undefined. The SEA Directive and Regulations aim to ensure that plan-makers and stakeholders are presented with clear, mutually exclusive choices.

¹⁰ See page 108 of the report available at: <https://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=24623&p=0>

¹¹ An earlier version of this SA Report Addendum (namely the draft version submitted to Members in August 2018) included a table of GIS analysis within an appendix dedicated to "Supplementary information on site options". However, the decision was subsequently taken to delete that appendix. The information presented was simply a repeat of the information presented in Appendix IV of the SA Report Update and, on reflection, was deemed unnecessary and with the potential to cause confusion.

Tier 1 - Guildford town centre

5.3.4 In-line with the sequential approach to spatial strategy, there is a need to maximise growth in Guildford town centre. This understanding is reflected in the submission plan, which supports 863 additional homes over the course of the plan period.¹²

5.3.5 The potential for additional growth is discussed across paras 14 to 16 of the Examination Document GBC-LPSS-020,¹³ with supplementary analysis presented within Appendix 1 of that document, before the conclusion is reached that: “*The plan includes all suitable, available and deliverable (that is, with a realistic prospect of delivering housing within 5 years) town centre sites as part of its supply.*” This conclusion was not contradicted by the Inspector, during the 3rd July hearing session.

N.B. it is also the case that there is no obvious potential for additional supply, early in the plan period, at any of the sites that are allocations within the submission plan. The Inspector has not indicated that this is a matter that should be explored.

5.3.6 In conclusion, **nil additional housing** within Guildford town centre was taken as a ‘given’, for the purposes of establishing additional housing scenarios (i.e. held **constant** across the scenarios).

N.B. for clarification, the new site allocation A60: White Lion Walk was already included within the supply in the submission version of the plan. The allocation of this site does not therefore contribute towards additional delivery and is, in any case, projected to deliver in years 6-10.

Tier 2 - Wider Guildford urban area

5.3.7 In-line with the sequential approach to spatial strategy, the next location at which to maximise growth – i.e. deliver as much of the residual housing as possible (namely that which cannot be delivered at Tier 1) - is the wider Guildford urban area. This understanding is reflected in the submission plan, which supports growth of an additional 1,399 homes over the course of the plan period.¹²

5.3.8 There are no sites available within the wider Guildford urban area that might potentially deliver additional supply within the early part of the plan period. Neither is there any potential for additional supply early in the plan period at any of the sites that are allocations within the submission plan.

5.3.9 As such, **nil additional housing** within the wider Guildford urban area was taken as a ‘given’, for the purposes of establishing additional housing scenarios (i.e. held **constant** across the scenarios).

N.B. there is also a need to consider the possibility of additional housing at land currently designated for non-housing uses. This matter is discussed across paras 17 to 20 of the Examination Document GBC-LPSS-020,¹³ which are repeated in **Box 5.1**.

Tier 3 - Ash and Tongham urban area

5.3.10 As above (N.B. the submission plan supports an additional 44 homes, noting that there are very few opportunities for infill or redevelopment in this area).¹²

Tier 4 - Built up area of villages

5.3.11 As above (N.B. the submission plan supports an additional 154 homes).¹²

¹² Excluding completions since 2015, outstanding permissions and trend based housing supply (windfall and rural exception sites).

¹³ GBC-LPSS-020 was prepared in response to discussions during the hearing session of 13th June and the Inspector’s letter to the Council of 26th June, and with the aim of informing discussions during the hearing session of 3rd July. It was produced with a view to informing debate at the hearings. The discussion led to the identification of a list of sources of potential additional supply; however, it was recognised that this was a preliminary list only, i.e. there would be a need for further work ahead of arriving at a final list.

Box 5.1: Ruling-out additional supply from land currently designated for non-housing uses

As explained by the Council, across paras 17 to 20 of the Examination Document GBC-LPSS-020 -

“The Council maintains that, notwithstanding the urgent need for increased housing, it is important to protect these valuable, lower value land uses as they help ensure a thriving local economy, boost the leisure and tourism industry and promote a vibrant town centre that performs a sub-regional role.

There is a demonstrable need for these land uses as identified in the Employment Land Needs Assessment, Retail and Leisure Study, and Hotel Futures report. Furthermore, as explained in greater depth in the Council’s written responses, national policy requires local planning authorities to support economic growth and promote competitive town centre environments.

The Submission Local Plan, with proposed modifications in response to the Inspector’s questions, is considered to strike the right balance in terms of protecting valuable sites whilst providing sufficient flexibility to enable those sites that are not viable or no longer needed to be changed to other uses, including housing. The Council do not consider it is sustainable to weaken these protection policies any further given the scarcity of these sites in the right locations.

Furthermore given the lower land values that these uses command, once they are changed to high value residential uses this is likely to be permanent.”

Tier 5 - Village ‘gap’ sites¹⁴

5.3.12 As above (N.B. the submission plan supports an additional 252 homes).¹²

Tier 6 - Brownfield in the Green Belt

5.3.13 As per tiers 3 to 5 (N.B. the submission plan supports an additional 195 homes).¹²

N.B. this supply figure is lower than that included within the Submission Local Plan supply due to the removal of Send Prison (LAA ref 2366) in the LAA Addendum (2018) as this site is no longer available for development. This site was projected to deliver 150 homes within years 6-10 of the plan period. There are naturally implications for the robustness of the housing supply in this part of the plan period; however, the updated housing trajectory, taking account of the loss of this site, remains suitably robust in the Council’s view.

Tier 7 - Countryside beyond the Green Belt (CBGB)

5.3.14 In-line with the sequential approach to spatial strategy, the next location at which to maximise growth – i.e. deliver as much of the residual housing as possible (namely that which cannot be delivered at Tiers 1 to 6) – is the CBGB, which is found in the west of the Borough, around the Ash/Tongham urban area and around the village of Ash Green.

5.3.15 The potential for additional growth is discussed within paras 21 to 26 of the Examination Document GBC-LPSS-020.¹³ One large omission site is available, namely Land to the east of the Street, Tongham, which has a capacity of c.600 homes. However, the conclusion is that: *“Given the scale of development that is already projected to occur within the early years of the plan, the Council consider that neither the remaining land allocated in the plan nor additional new sites in this area would realistically be capable of boosting early delivery.”* There are almost 1,000 outstanding permissions on CBGB that are projected to be delivered during the first five years (approximately 200 homes per year). Whilst these are spread across a number of different sites, it is not possible to assume with confidence that a higher rate of delivery could be supported within this specific area. This conclusion was not contradicted by the Inspector, during the 3rd July hearing session.

5.3.16 In conclusion, **nil additional housing** within the CBGB was taken as a ‘given’, for the purposes of establishing additional housing’ scenarios (i.e. held **constant** across the scenarios).

¹⁴ Gap sites fall within proposed Green Belt boundaries, but outside the built up area, i.e. the proposed ‘white land’ around villages.

Tier 8 - Green Belt around Guildford or Godalming/Farncombe

- 5.3.17 In-line with the sequential approach to spatial strategy, 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, or around the edge of Godalming.¹⁵
- 5.3.18 Available omission sites are as follows (also shown as ‘additional housing site options’ in **Figure 5.2**) -
- ‘Clandon Golf’ and ‘Liddington Hall’ are both large sites located on the edge of the Guildford urban area. Both sites have been given close attention through-out the plan-making / SA process, and it was similarly identified that both should be examined further through additional housing scenarios, recognising that nil or lower growth at Tier 8 sites leads to increased pressure at sites lower in the hierarchy, namely the ‘Tier 10’ village Green Belt sites discussed below. Both sites are associated with certain issues/impacts, but there are no major concerns that indicate that either site should be ruled-out of contention for the purposes of establishing additional housing scenarios. Both sites could deliver housing in the early part of the plan period; however, both sites would also continue to deliver housing in the middle part of the plan period, if allocated in full. This is not a desirable outcome, i.e. the aim is to boost housing supply in the early part of the plan period *only* (even noting loss of Send Prison from the housing supply - see para 5.3.13). As such, discussions were held with the promoters of both sites, leading to the identification of smaller sites (with defensible Green Belt boundaries) sufficient to deliver housing in the early part of the plan period, and no more. Specifically, two small sites have been identified each capable of delivering c.300 homes. This scale reflects features on the ground able to serve as defensible Green Belt boundaries, and is suitable from a perspective of not wishing to rely on any one site delivering too high a proportion of the 550 homes target (in order to minimise delivery risk).
 - Land north of Keens Lane - would involve a modest further extension to submission allocation A22: Keens Lane. However, the site is problematic in Green Belt terms. This is because the site sits within a larger land parcel (GBCS land parcel J3) that would need to be removed from the Green Belt in full, were the site to be allocated, in order to ensure a strong, defensible Green Belt boundary. There is no potential to deliver housing within the entire land parcel, because of proximity to the Thames Basin Heaths Special Protection Area (TBHSPA). Allocation of the site would involve developing only c.20% of the additional land that would need to be removed from the Green Belt, hence Green Belt release could not be justified, in the Council’s view.
 - Land at Aaron’s Hill is a cross-boundary site (a single large field) on the edge of Godalming (a higher order settlement in Waverley Borough), with that part of the site falling within Waverley Borough an allocation within the Waverley Local Plan. The potential for allocating the site was given close consideration as part of SA work completed in 2017, as reported within the SA Report Update (2017), and it was similarly identified that it should be examined further through additional housing scenarios, recognising that nil or lower growth at Tier 8 sites leads to increased pressure at sites lower in the hierarchy, namely the ‘Tier 10’ village Green Belt sites discussed below. The site is associated with certain issues/impacts, but there are no major concerns that necessarily indicate that it should be ruled-out of contention for the purposes of establishing additional housing scenarios. Discussions with the site promoter have confirmed that the Guildford element of the scheme would yield 200 homes, and all within the early part of the plan period.¹⁶

¹⁵ Godalming falls within neighbouring Waverley Borough, but abuts the southern edge of Guildford Borough. Godalming is defined as a ‘Community with Key Services’ within the Waverley Local Plan. It is the second largest settlement in Waverley, and is considerably larger than any of the Green Belt villages within Guildford Borough.

¹⁶ As explained at paras 36 and 37 of GBC-LPSS-020 “The Council has already been involved with pre-app discussions on this site with colleagues at Waverley. Whilst the Waverley part of the site is progressing through the planning application process, much of the initial work undertaken to assess the suitability of the scheme has been undertaken on a comprehensive basis considering both parts of the site... The promoters intend to engage different developers to each build out part of the site. In light of this 200 homes on the Guildford site are therefore considered deliverable in the first five years of the plan.”

- Land at New Pond Road (130 homes) and Pond Farm, Furze Lane (90 homes) are two near adjacent sites on the northern edge of Farncombe, which itself comprises the northern part of Godalming (Farncombe and Godalming are not distinguished in the Waverley Local Plan settlement hierarchy). Both comprise relatively less sensitive Green Belt, i.e. Green Belt assigned an amber rating by the Green Belt and Countryside Study; however, both are associated with significant constraints. First and foremost, both fall within the Surrey Hills AONB, and so can be considered subject to landscape constraint. Also, both are subject to significant fluvial flood risk, with Flood Zone 3 constraining the southern parts of the sites, namely those parts of the sites that relate to the existing northern edge of Farncombe. There are no obvious potential benefits of development that might serve to over-ride these constraints, noting that Farncombe railway station and local centre (as defined by the Waverley Local Plan) is beyond 800m distant.

5.3.19 In conclusion, **additional housing** at sites around the Guildford or Godalming urban areas was identified as a '**variable**', for the purposes of establishing borough-wide additional housing scenarios. In light of the discussion presented above, there are three sites in contention, namely: Clandon Golf (300 homes); Liddington Hall (300 homes); and Land at Aaron's Hill (200 homes). Additional housing scenarios involving delivering these sites in combination - both with one another and with other sites discussed below - are examined further within **Section 5.4**.

Tier 9 - New settlement

5.3.20 In-line with the sequential approach to spatial strategy, the next location at which to maximise growth – i.e. deliver as much of the residual housing as possible (namely that which cannot be delivered at Tiers 1 to 8) – is at a new settlement (which would naturally have to be within the Green Belt). This understanding is reflected in the submission plan, which allocates a new settlement at Wisley airfield.

5.3.21 There are no other new settlement options available, let alone with the capacity to deliver housing within the early part of the plan period. Neither is there any potential for additional supply early in the plan period at Wisley Airfield.

5.3.22 As such, **nil additional housing** at this tier was taken as a 'given', for the purposes of establishing additional housing scenarios (i.e. held **constant** across the scenarios).

Tier 10 - Green Belt around villages

5.3.23 In-line with the sequential approach to spatial strategy, 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, only three such scenarios can be envisaged, namely scenarios involving two of the three Tier 8 'sites in contention' discussed above (para 5.3.18). There is also a need to explore other scenarios besides, as all three Tier 8 sites are larger sites, and hence potentially associated with an element of delivery risk.

5.3.24 The first point to note is that there is one submission allocation with potential to deliver additional housing within the early part of the plan period, namely **Garlick's Arch**. The potential for additional housing yield, in order to make full use of the site capacity, is discussed at para 13 of the Examination Document GBC-LPSS-020, and the Inspector did not, during hearing sessions, subsequently indicate any concerns with this proposal. The additional supply is 150 homes (taking the total yield of the site to 550); however, only 50 of these homes would be built within the first five years. Delivery of the remaining 100 homes would be in year 6 of the plan, and therefore contribute towards maintaining a rolling five year supply from year 2. This helps to reduce any concerns about additional supply in the middle of the plan period, when the supply is already set to be robust. In light of these points, **additional housing** at this site (50 homes in first five years; 150 homes in total) was taken as a 'given', for the purposes of establishing additional housing scenarios (i.e. held **constant** across the scenarios).

N.B. Garlick's Arch can be seen in **Figure 5.3**, as a blue site with a red outline, indicating that it is both a 'submission allocation' and an 'additional housing site option'.

5.3.25 Finally, there is need to consider the **remaining omission sites**, as understood from Appendix C of the Land Availability Assessment (LAA; see pages 531 to 547). A large number of omission (or 'discounted') sites are listed in the LAA; however, the great majority can be ruled-out immediately, for clear and unambiguous reasons, including -

- all of the sites identified by the LAA as "Not identified [as a potential development area, PDA] in the Green Belt and Countryside Study [GBCS]"; and
- eight sites that, whilst identified as PDAs by the GBCS, are not being actively promoted for residential uses (which immediately calls into question their ability to deliver housing within the early part of the plan period).¹⁷

5.3.26 The remaining 16 sites are considered within **Box 5.2**, with supplementary information provided in **Box 5.3** (also note methodological discussion in Box 5.1, above). The sites are all shown as 'additional housing site options' in **Figure 5.2**.

Box 5.2: Green Belt site options around villages (note methodological discussion in Box 5.1, above)

As discussed above, there is a need to examine 16 village Green Belt omission sites in detail, with a view to identifying which should be taken forward for further examination (**Section 5.4**).

Sites are considered on a village-by-village basis, recognising that there is a desire to avoid geographical clustering of sites, which in turn serves to imply a need to take forward no more than one site per village.

Chilworth

There is one site - Land at Hornhatch Farm (80 homes) - which performs well relative to other village Green Belt sites discussed here. The potential for allocating the site was given close consideration as part of SA work completed in 2017, as reported within the SA Report Update (2017), and it was similarly identified that it should be examined further through additional housing scenarios. The site is being actively promoted, and could deliver in full within the first five years. It is considered further below, within **Section 5.4**.

Fairlands

There are two sites - Land to the west of Fairlands (270 homes); and Land at Hook Farm and Hunts Farm, Fairlands (225 homes) - of which one is considered sequentially less preferable. Specifically, the southern site is less preferable as access is proposed to be achieved from the east, which would involve crossing an area of common land, which in turn would necessitate a legal process giving rise to a risk of unforeseen delays to delivery.

The sequentially preferable site - Land to the west of Fairlands – consists of two PDAs identified in the GBCS, and is too large in its entirety (550 homes); however, discussions with the site promoter have served to confirm that there is the potential to deliver a smaller site, whilst still making use of strong, defensible Green Belt boundaries. A smaller 270 home site (one rather than two of the GBCS PDAs) has been identified that could deliver in full within the first five years. It is considered further below, within **Section 5.4**.

Flexford

There are four omission sites, of which one can be ruled-out immediately as sequentially least preferable. This is Land to east of The Paddocks (50 homes), which encompasses an SNCI. This was removed from the 2016 Proposed Submission Plan on the basis of a re-survey of the SNCI.

¹⁷ Land to the south of West Horsley (being proposed for a relocated Raleigh School); Land to the east of Shere Road, West Horsley (not promoted through Reg 19); Land to the north east of Effingham (has planning permission); Land West of Ripley, Portsmouth Road, Ripley (not promoted through Reg 19); Land to the south east of Hunts Hill Farm, north of Normandy (not promoted through Reg 19); Greater expansion of Send (south west) (half the site is being promoted for employment uses); Greater expansion of Send (north) (only part being actively promoted, with the promoted sites discussed below as the two sites north and south of Tannery Lane); Papercourt Plot 'A' B D and E, Polesden Lane, Send (not promoted through Reg 19); and Land around Burnt Common warehouse, London Road, Send (allocated for industrial uses).

Of the remaining three, one can be identified as sequentially least preferable. This is Land to the south of Normandy and north of Flexford (280 homes), which comprises the southern part of a previously much larger site (namely that part which stands-out as benefiting from proximity to Wanborough railway station), that was a proposed strategic allocation in the 2016 Proposed Submission Plan. The site benefits from its proximity to the rail station; however, a primary issue with the site is that it is too large, and has no potential to be made smaller whilst making use of strong, defensible Green Belt boundaries. It would introduce a very different built form to Flexford, and would have a greater visual impact than the other sites discussed below. It is also the case that, as a larger site, there could be an element of delivery risk, noting that the sequential approach to spatial strategy would necessitate that any allocation at Flexford would need to be in addition to allocation of one of the three Tier 8 sites discussed above, which are all similarly large sites.

Of the two more preferable sites, on balance one can be identified as overall sequentially preferable, namely Land east of Glaziers Lane (105 homes). The potential for allocating the site was given close consideration as part of SA work completed in 2017, as reported within the SA Report Update (2017), and it was similarly identified that it should be examined further through additional housing scenarios. Relative to the other site (Land between Beech Lane and Westwood Lane; 100 homes) Land east of Glaziers Lane benefits from better proximity to the train station (it is almost adjacent). This is considered to be an overriding consideration, albeit the site would be visible from the railway station and Glaziers Lane, and is less preferable in Green Belt terms (the GBCS identifies the PDA within which Land East of Glaziers Lane falls as comprising 'red-rated' Green Belt, whilst Land between Beech Lane and Westwood Lane falls within an 'amber-rated' PDA). Land east of Glaziers Lane is considered further in **Section 5.4**.

Normandy

Both omission sites - Land at north Wyke Farm (65 homes);¹⁸ and Rear of Alfriston House, Guildford Road (10 homes) - perform relatively poorly on the basis that they are located at either end of Normandy, which is a small dispersed settlement (albeit with a primary school (adjacent to the Wyke Farm site) and GP surgery.¹⁹ There is a regular bus service to Guildford/Aldershot, but the settlement does not benefit from a train station, unlike nearby Flexford. Also, Normandy is relatively close to the TBHSPA, albeit neither site is within 400m, such that there would be potential for effective avoidance/mitigation through SANG delivery.

Send / Send Marsh

There are four omission sites in total, with two located close to one another to the west (Send), and the other two close to one another to the east (Send Marsh).

One of these sites can be ruled-out as sequentially least preferable. This is Land north of Tannery Lane (100 homes), which is in close proximity to the River Wey Navigation Conservation Area. The other sites (Land South of Tannery Lane, Send, 50 homes; Land at Polesdon Lane and Send Marsh Road, 50 homes; and Land at Alderton's Farm, Send Marsh Road, 120 homes) are more challenging to differentiate. All are considered further in **Section 5.4**.

Shalford

There is one site - Land to the east of Shalford, Chinthurst Lane (175 homes) - which performs poorly relative to other village Green Belt sites discussed here. Whilst the site is within walking distance of Shalford railway station, and comprises 'amber-rated' Green Belt, it falls within the locally designated Area of Greater Landscape Value (AGLV) and the access road is considered unsuitable for this scale of development.

West Horsley




Of the two omission sites, one can be ruled-out immediately as less preferable, namely Land to the south of West Horsley, Shere Road (55 homes). This site would represent an illogical extension to the settlement in built form terms, extending what is already a linear settlement beyond the logical barrier of the A246.

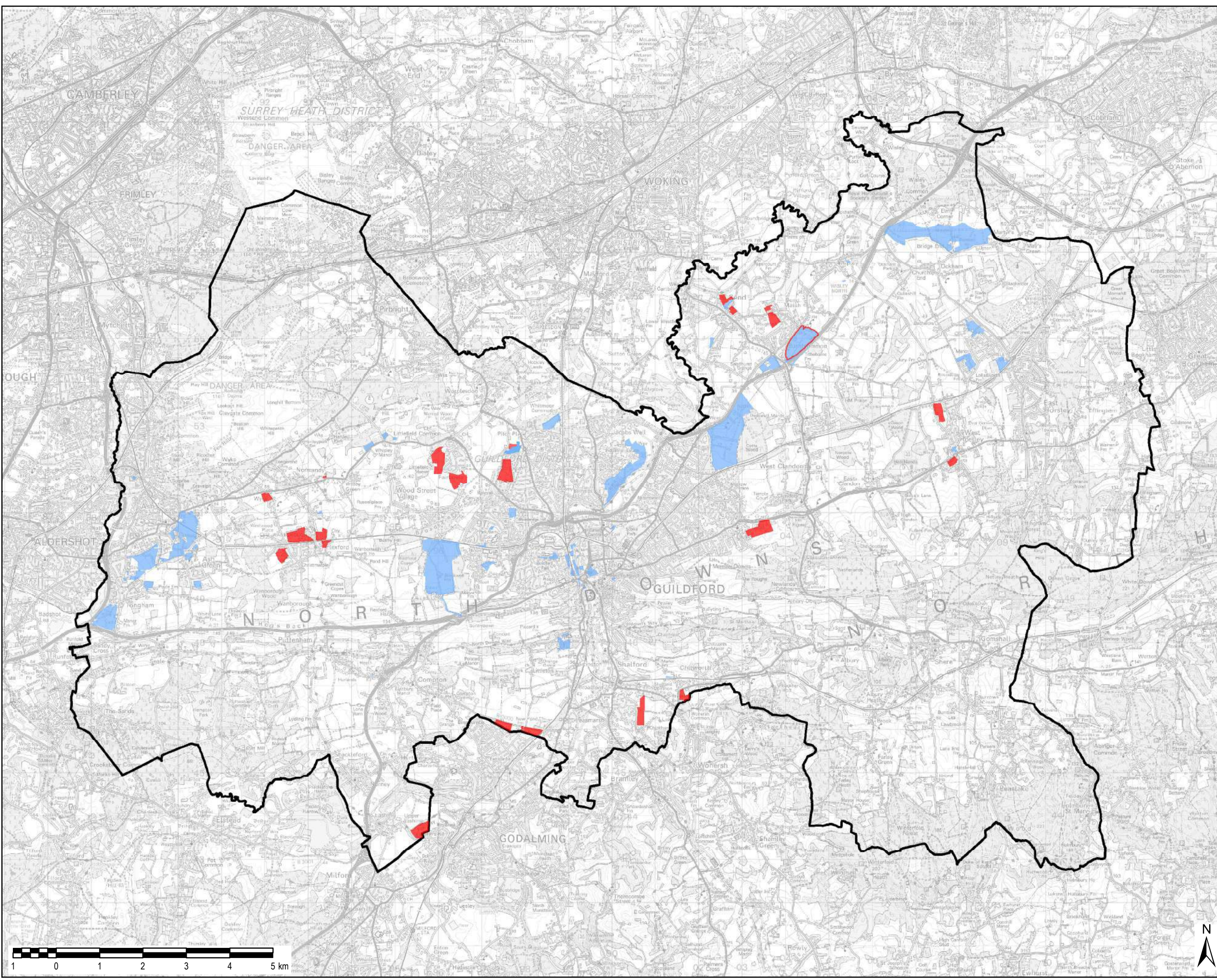
The remaining site - Land off Ripley Lane, Ripley Lane (185 homes) - performs better in built form terms, but is still problematic, in this respect, noting that the scheme would need to front onto Ripley Lane, which is an unmarked rural lane. It is also the case that there are limited services/facilities in West Horsley, with those in East Horsley (also Horsley Station) over 2km distant.

¹⁸ An appeal for 78 units was dismissed on 16 August 2016, and the site has not since been promoted through the Local Plan process.

¹⁹ N.B. the Glaziers Lane site at Flexford is as close to the GP surgery as the Wyke Farm site at Normandy.

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- LEGEND**
-  Guildford Boundary
 -  Additional Housing Site Options
 -  Submission allocations (2017; N.B. not all housing)



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Purpose of Issue **FINAL**

Client **GUILDFORD BOROUGH COUNCIL**

Project Title **GUILDFORD LOCAL PLAN SA**

Drawing Title **ADDITIONAL HOUSING SITE OPTIONS**

Drawn SM	Checked MF	Approved MF	Date 06/09/2018
AECOM Internal Project No. 60537035		Scale @ A3 1:80,000	

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5.4 Establishing the reasonable alternative additional housing scenarios

Introduction

5.4.1 The discussion above leads to the identification of a number of sites that potentially warrant further examination through the appraisal of additional housing scenarios. The aim of this section is to consider different ways that the site options might be 'packaged-up' into scenarios.

Scenarios involving maximum accordance with the spatial strategy

5.4.2 As a first port of call, there is a need to consider scenarios that would involve maximum accordance with the spatial strategy, which in practice means scenarios involving allocation of two of the three Tier 8 sites, with no need to place any reliance on Tier 10 sites.²⁰

5.4.3 There are three combinations of two sites, and on balance it is considered that all three should be taken forward for examination as scenarios - see additional housing **Scenarios 1, 2 and 7** within Table 5.1, below.

5.4.4 The scenario involving the two larger sites - namely Clandon Golf and Liddington Hall - would involve providing for more homes than necessary (650 in the first five years, i.e. 100 too many); however, this scenario warrants appraisal nonetheless, recognising the sites in question benefit from being extensions to the Borough's main settlement, namely Guildford.

Scenarios necessitating village Green Belt sites

5.4.5 It is considered appropriate to also examine scenarios that would involve just one of the Tier 8 sites, delivered in combination with one or more Tier 10 sites. There is a deliverability argument for examining such scenarios, as scenarios 1, 2 and 7 discussed above all rely on a small number of larger sites, such that they are associated with a degree of delivery risk.

5.4.6 As discussed within Section 5.3, there are 16 village Green Belt omission sites feasibly in contention, but the majority can be ruled out as sequentially less preferable (noting that there is only a need to identify village Green Belt sites with a combined capacity of up to 300 homes). Sites are ruled out after having taken into account: constraints / site suitability (in comparison to one another, or in comparison to competing sites at the same settlement); settlement suitability; and delivery risk (taking account of geographical clustering). The outcome is the identification of the following sites as having greater potential -

- Land at Hornhatch Farm, Chilworth (80 homes)
- Land to the west of Fairlands (270 homes; or reduced to 200)
- Land east of Glaziers Lane, Flexford (105 homes)
- Land South of Tannery Lane, Send (50 homes)
- Land at Polesdon Lane and Send Marsh Road (50 homes)
- Land at Alderton's Farm, Send Marsh Road (120 homes)

5.4.7 There are three further considerations.

²⁰ Allocating all three is unreasonable as it would involve providing for 850 additional homes in the first five years, once account is also taken of the additional 50 homes to be delivered at Garlick's Arch (a constant across all scenarios).

- 5.4.8 Firstly, there is a need to consider the reasonableness of scenarios involving allocation of Land to the west of Fairlands. The site does not stand-out as subject to constraint, and Fairlands appears no less suited to growth than other settlements; however, a concern is with the size of the allocation. The resulting scenario would involve additional supply via just two sites, and hence could be associated with a degree of delivery risk. Whilst scenarios 1, 2 and 7 would equally involve reliance on just two large sites, they are preferable as they align closer with the spatial strategy. As such, scenarios involving this site are considered unreasonable.
- 5.4.9 Secondly, there is a need to consider further the sites at Send / Send Marsh. Considerations are as follows -
- Land South of Tannery Lane, Send (50 homes) - red-rated Green Belt, and is adjacent to submission allocation A42 (Clockbarn Nursery; 60 homes), but otherwise relatively unconstrained. Benefits from proximity to Send local centre, and an hourly bus service (not Sundays) between Woking (25 mins) and Guildford (35 mins) town centres.
 - Land at Polesdon Lane and Send Marsh Road (50 homes) - red-rated Green Belt and is subject to a degree of wider constraint (proximity to listed buildings; adjacent footpath likely to be a popular route; SSSI within 400m); however, comprises an element of previously developed land (PDL). Neither Send local centre nor bus services are easily accessible; however, the primary school and GP surgery are relatively close (under 1km via a footpath), and Ripley District Centre is c.2.5km along the Portsmouth Rd, which has a cycle path.
 - Land at Alderton's Farm, Send Marsh Road (120 homes) - adjacent to the 'Polesdon Lane' site discussed above, and hence similarly constrained by proximity to listed buildings and a SSSI, but benefits from comprising amber-rated Green Belt. The potential for allocation was given close consideration as part of SA work completed in 2016 and 2017, as reported within the SA Report (2016) and the SA Report Update (2017).
- 5.4.10 The differences in suitability between these sites are quite marginal, but on balance the Council considers Land South of Tannery Lane, Send to be sequentially least preferable. The Council gives weight to the PDL element of Land at Polesdon Lane and Send Marsh Road, and the 'amber Green Belt' status of Alderton's Farm (also its 'not-too-big-not-too small' size, and the fact that it has been a focus of appraisal and consultation twice).
- 5.4.11 Thirdly, there is a need to consider the reasonableness of allocating the two more preferable Send Marsh sites in combination. The conclusion is that allocation of both sites is problematic, noting both delivery risk and also the potential for in-combination effects.²¹
- 5.4.12 This discussion leads to the identification of three scenarios involving reliance on village Green Belt sites - see **Scenarios 3, 4 and 5** within Table 5.1. Each would involve allocation of one of the three Tier 8 sites, plus the combination of three village Green Belt sites that would lead to a total number of homes in the region of 550, and also avoiding allocation of both Send Marsh sites.
- 5.4.13 Consideration was given to leaving the number of scenarios at six; however, on balance, it was considered appropriate to examine one further scenario - see Scenario 6. This scenario would involve all four village Green Belt sites - i.e. including both at Send Marsh - plus the smallest of the three Tier 8 sites, namely Land at Aaron's Hill. The total number of additional homes would be 605, which is higher than the target figure of 550, but on balance it was considered reasonable to examine this scenario nonetheless, for completeness.

²¹ At the very local scale there is a need to consider in-combination effects on a nearby cluster of listed buildings; plus there is a need to consider in-combination effects at the Send/Send Marsh scale, noting that the settlement is already allocated the large Garlick's Arch site (550 homes), two smaller submission allocations (100 homes in total) and a significant new employment site (site A58).

Concluding note on selecting the reasonable alternatives

- 5.4.14 The seven additional housing scenarios introduced above are presented below within **Table 5.1** and subsequently across a series of **maps** (with the maps also showing the submission allocations, for context).
- 5.4.15 The scenarios presented in Table 5.1 are considered to be the ‘reasonable alternatives’ in that they are underpinned by a sound understanding of strategic (‘top down’) and site specific (‘bottom-up’) issues and opportunities, and on the basis that they are suitably wide ranging and distinct, such that their appraisal should enable helpful discussion of key issues.
- 5.4.16 There is a need to justify reasonable alternatives in “outline” terms only, and it is considered that the discussion presented within this Chapter, when read as a whole, more than meets that requirement. However, with a view to providing supplementary “outline reasons”, **Box 5.3** provides the Council’s summary reasons for not progressing certain sites.

Box 5.3: The Council's summary reasons for ruling-out certain sites prior to examination of scenarios

In order to understand the 'outline reasons' for arriving at the reasonable additional housing scenarios there is a need to read Chapter 5 ('Selecting the reasonable alternatives') as a whole. As discussed, scenarios are arrived at following 'top down' and 'bottom up' consideration of issues and options.

However, it is recognised that the 'outline reasons' presented within Sections 5.3 and 5.4 will be of particular interest to many stakeholders, namely the reasons for ruling out specific site options despite these sites being actively promoted and having been identified as a PDA by the GBCS.

The analysis presented within Sections 5.3 and 5.4 is considered suitably proportionate (see Box 5.1); however, it is helpful to present further summary information here. The following table presents the Council's summary reasons for each of the sites in question -

Land north of Keens Lane, Guildford (50 homes)	The remainder of the PDA would need to be released from the Green Belt and left undeveloped, leading to inefficient release.
Land at New Pond Road, Farncombe (130 homes)	Wholly within the AONB.
Pond Farm, Furze Lane, Farncombe (90 homes)	
Land to the west of Fairlands (270 homes)	Would need to deliver in combination with one of the larger Tier 8 sites, leading to a heavy reliance on two sites to deliver the 550 home target; and the resulting scenario is sequentially less preferable to other scenarios involving a similar delivery risk (namely the scenarios involving two Tier 8 sites). In other words, scenarios involving a larger site at a village are not favoured, on delivery and settlement hierarchy grounds.
Land at Hook Farm and Hunts Farm, Fairlands (225 homes)	Access problems (with implications for delivery risk) and delivery risk (as per the site above).
Land to east of the Paddocks, Flexford (50 homes)	Comprises an SNCI.
Land south of Normandy / north of Flexford (280 homes)	Sequentially less preferable to an alternative site at Flexford (East of Glaziers Lane), noting delivery risk (as per the Fairland's sites, discussed above) and visual impact.
Land between Beech Lane and Westwood Lane, Flexford (100 homes)	Sequentially less preferable to an alternative site at Flexford, noting relative distance to Wanborough train station.
Land at north Wyke Farm, Normandy (65 homes)	Normandy is a small, dispersed rural settlement, less suited to growth than other villages; and Normandy is close to Flexford, where there is a sequentially preferable site that benefits from proximity to Wanborough train station.
Rear of Alfriston House, Guildford Road, Normandy (10 homes)	
Land North of Tannery Lane, Send (100 homes)	Would impact on the setting of the River Wey Conservation Area; also adjacent to a submission allocation.
Land South of Tannery Lane, Send (50 homes)	Adjacent to submission allocation; and sequentially less preferable to alternative nearby sites at Send Marsh.
Land to the east of Shalford, Chinthurst (175 homes)	Wholly within the AGLV; access road not suitable for development of this scale.
Land to the south of West Horsley, Shere Road (55 homes)	Built form / visual impacts; access to services/facilities.
Land off Ripley Lane, Ripley Lane, West Horsley (homes)	

Table 5.1: The (reasonable) additional housing scenarios

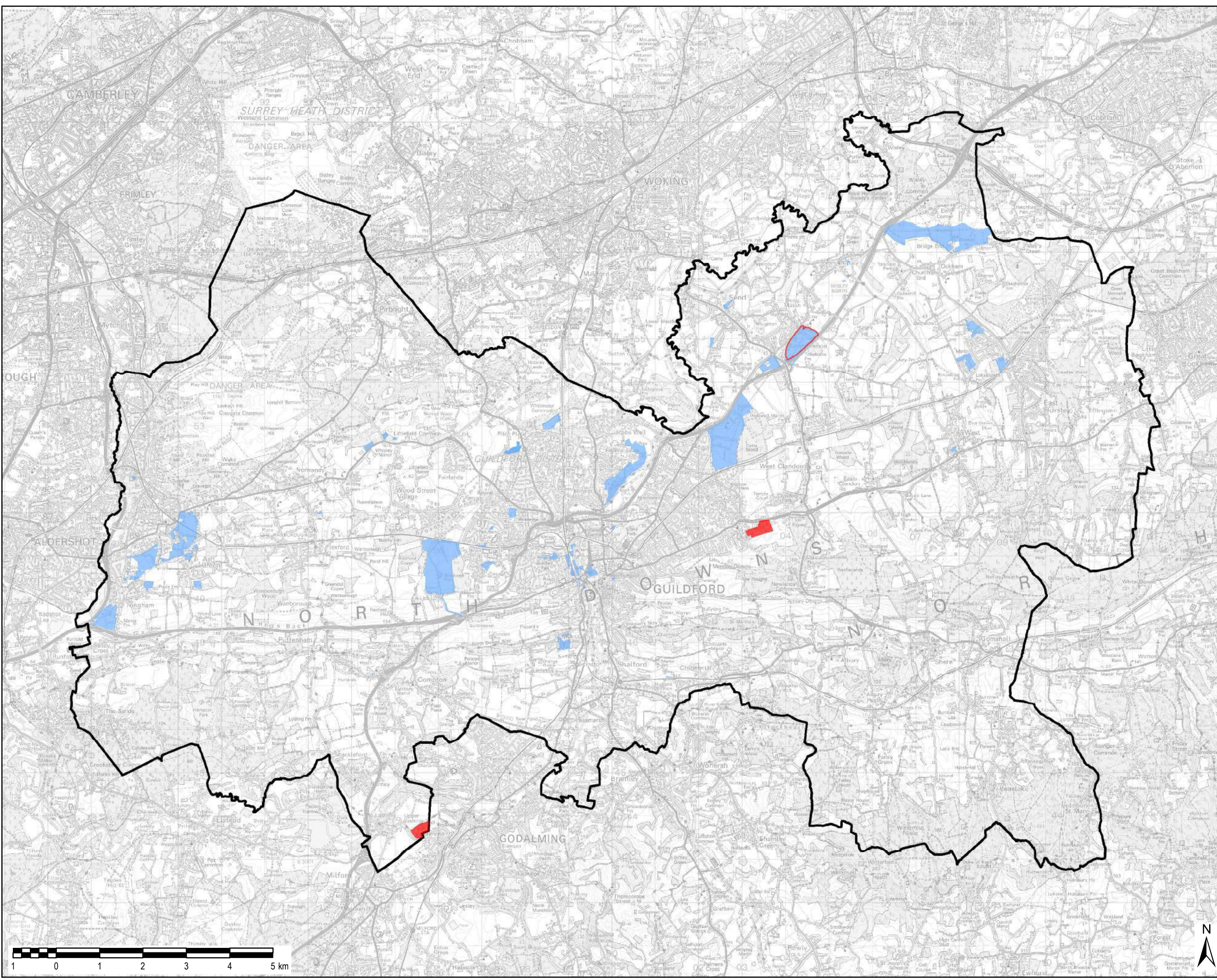
	Option 1 Clandon Golf Aaron's Hill	Option 2 Lidd'ton Hall Aaron's Hill	Option 3 Aaron's Hill Small sites	Option 4 Clandon Golf Small sites	Option 5 Lidd'ton Hall Small sites	Option 6 Aaron's Hill Small sites +	Option 7 Clandon Golf Lidd'ton Hall
Constant							
							50
Variables							
							300
	Liddington Hall, Guildford	300			300		300
	Aaron's Hill, Farncombe	200	200	200		200	
Tier 10	Land at Polesdon Lane & Send Marsh Road, Send Marsh			50	50	50	
	Land at Hornhatch Farm, New Road, Chilworth			80	80	80	
	Land east of Glaziers Lane, Flexford			105	105	105	
	Land at Alderton's Farm, Send Marsh Road, Send Marsh			120		120	
Total additional homes (yrs 1 to 5)*	550	550	555	585	585	605	650
% over 550 home target			1%	6%	6%	10%	18%

* There is a need to reiterate two points. Firstly, these homes would be in addition to the land supply supported by the submission plan. Secondly, a further 100 additional homes are proposed at Garlick's Arch, but would be delivered in year 6.

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LEGEND

- Guildford Boundary
- Additional Housing Sites
- Submission allocations (2017; N.B. not all housing)



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Purpose of Issue **FINAL**

Client **GUILDFORD BOROUGH COUNCIL**

Project Title **GUILDFORD LOCAL PLAN SA**

Drawing Title **OPTION 1:
CLANDON GOLF
AARON'S HILL**

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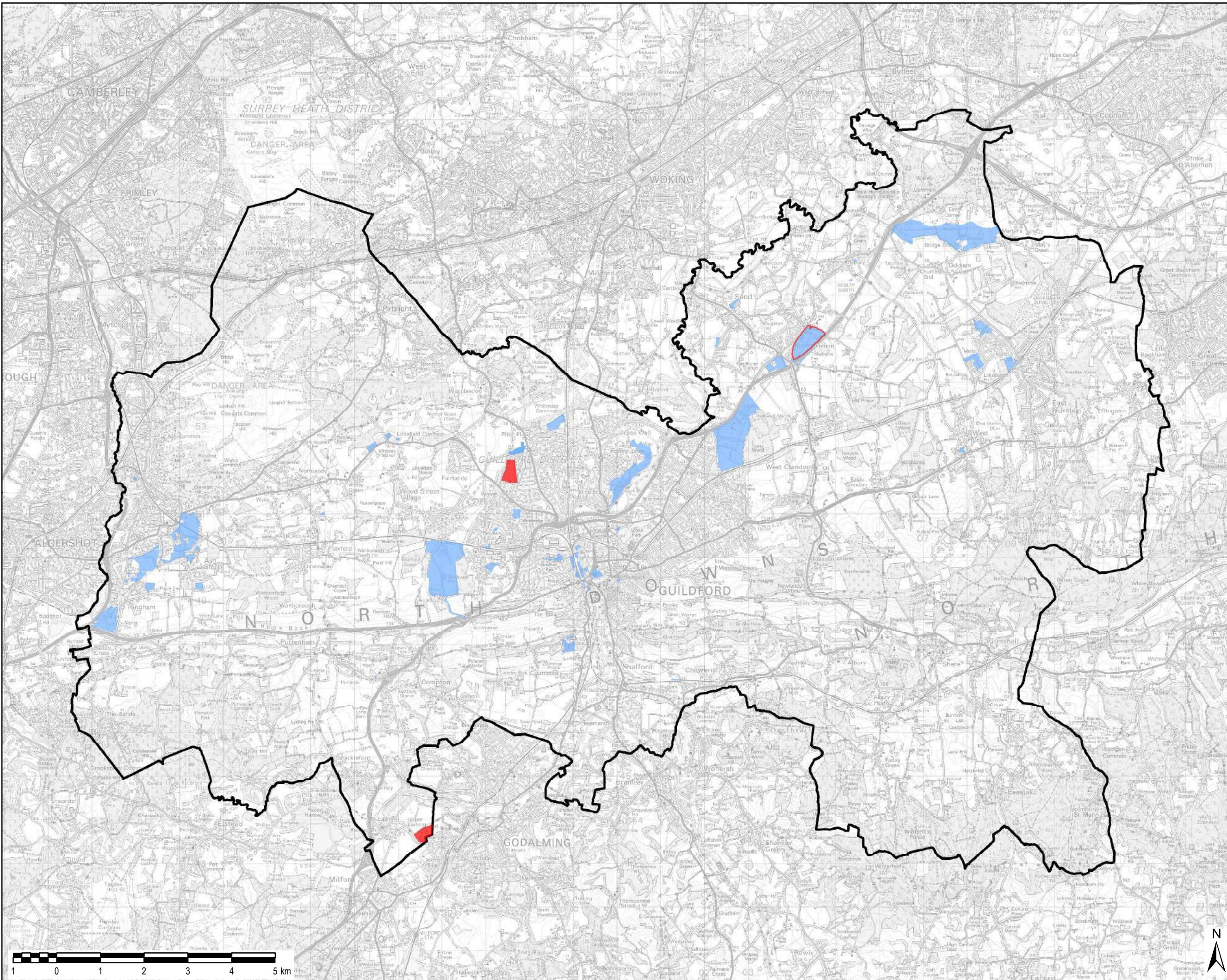


File Name: Z:\Projects\Guildford SA 60537035\02_Maps\Figure 2 - Option 1 Clandon Golf Aaron's Hill .mxd

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Project Title **GUILDFORD LOCAL PLAN SA**

Drawing Title **OPTION 2:
LIDDINGTON HALL
AARON'S HILL**

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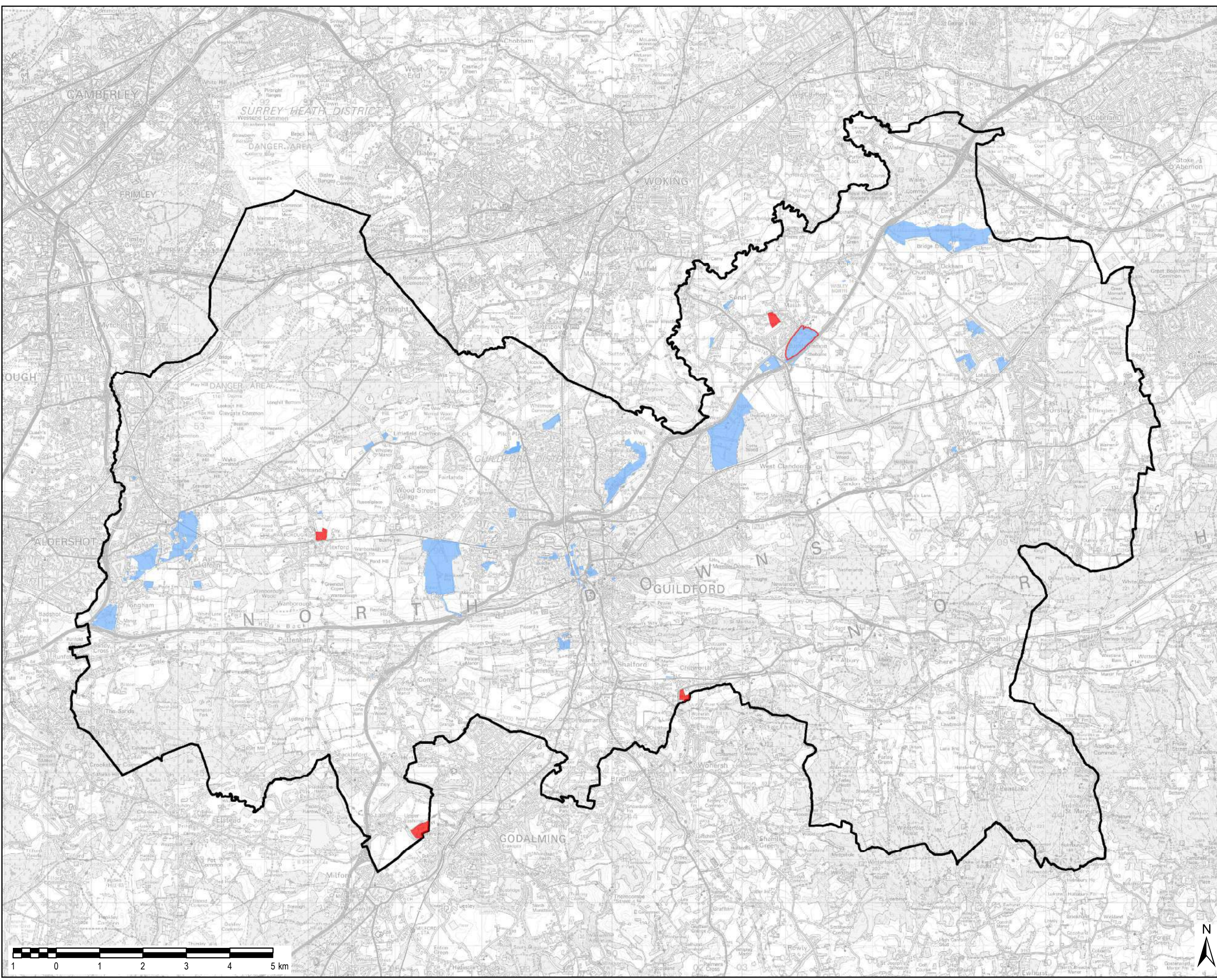


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-  Submission allocations (2017; N.B. not all housing)



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Project Title **GUILDFORD LOCAL PLAN SA**

Drawing Title **OPTION 3: AARON'S HILL SMALL SITES**

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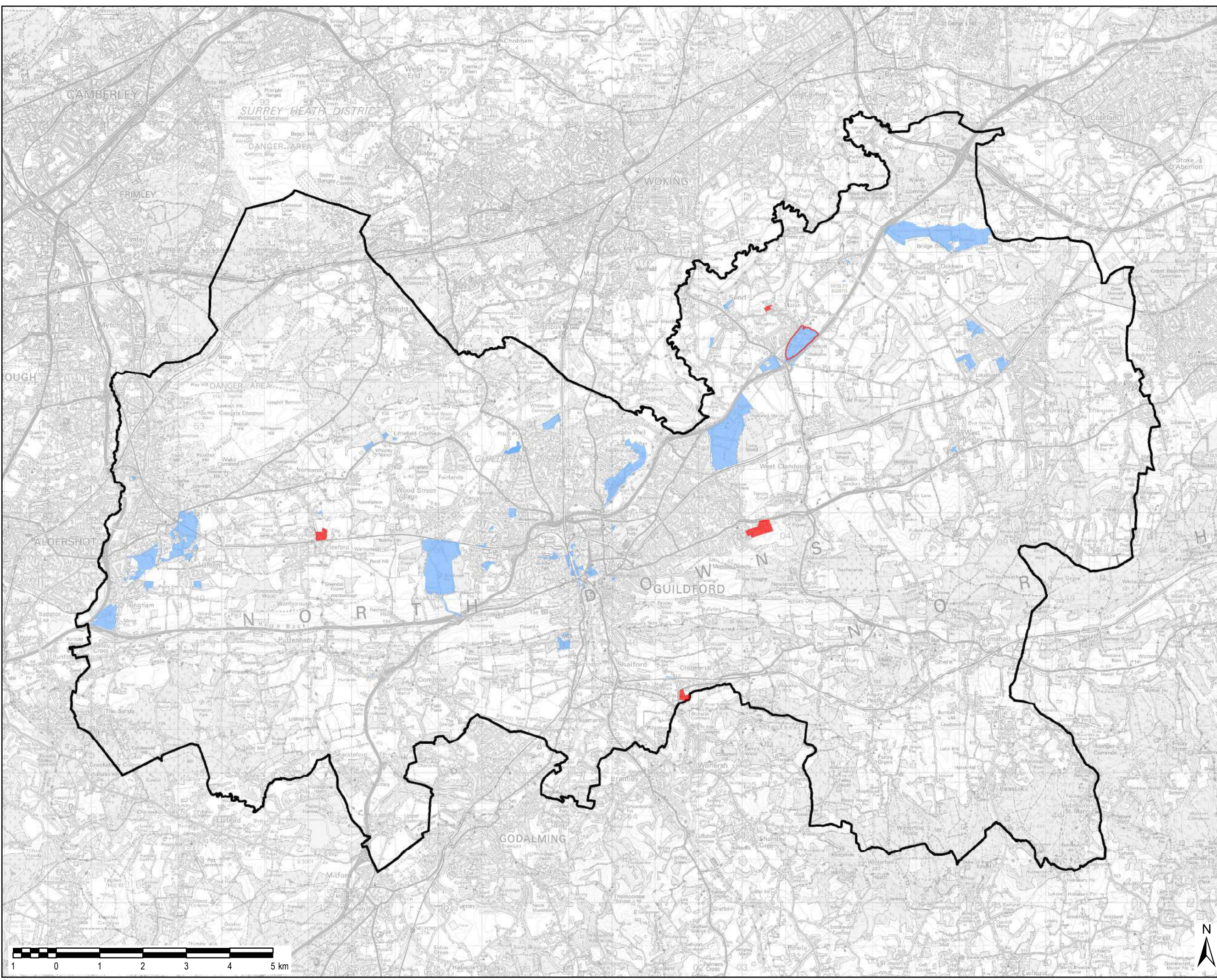


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-  Additional Housing Sites
-  Submission allocations (2017; N.B. not all housing)



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Project Title **GUILDFORD LOCAL PLAN SA**

Drawing Title **OPTION 4:
 CLANDON GOLF SMALL SITES**

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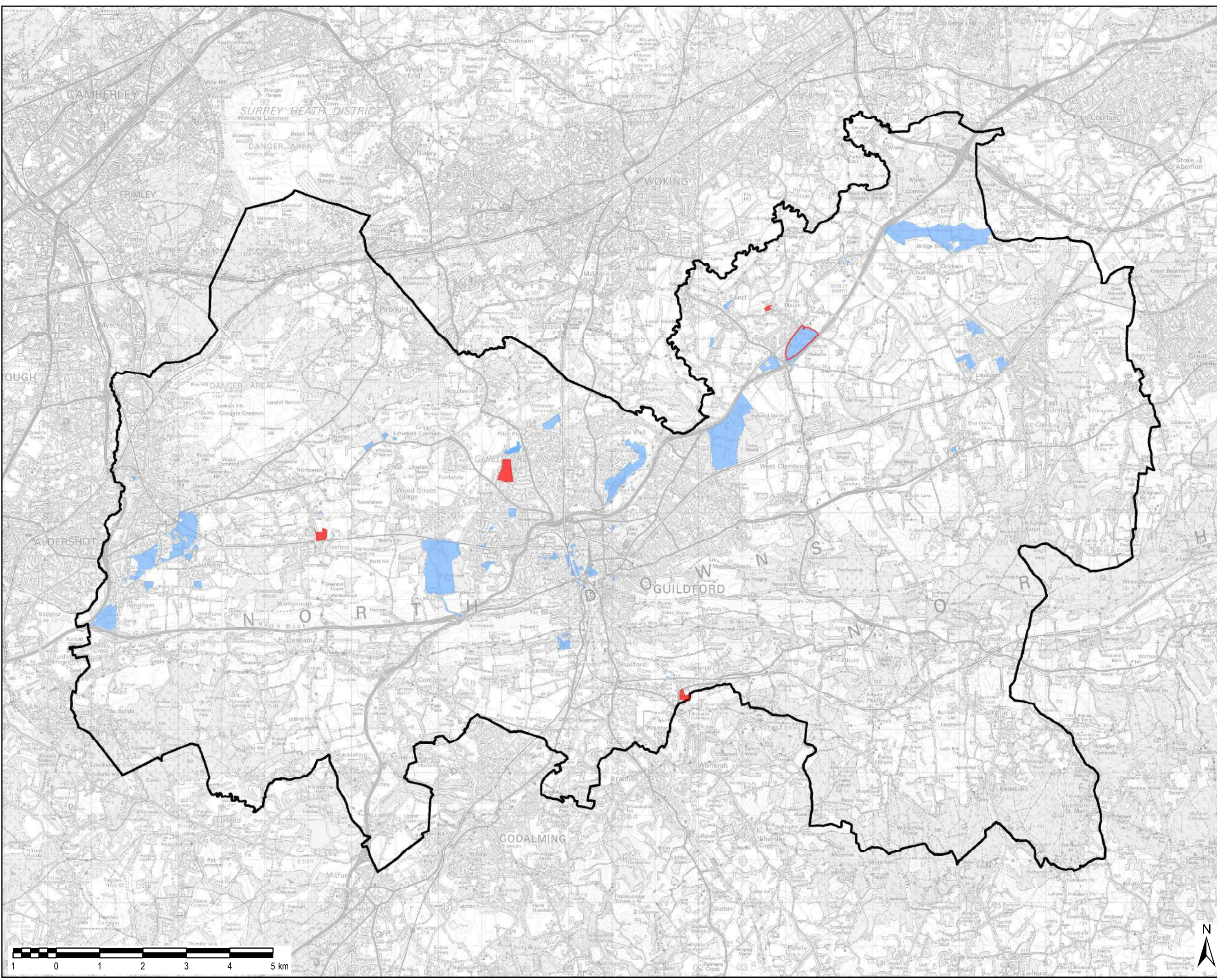
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LEGEND

-  Guildford Boundary
-  Additional Housing Sites
-  Submission Allocations



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Project Title **GUILDFORD LOCAL PLAN SA**

Drawing Title **OPTION 5:
LIDDINGTON HALL
SMALL SITES**

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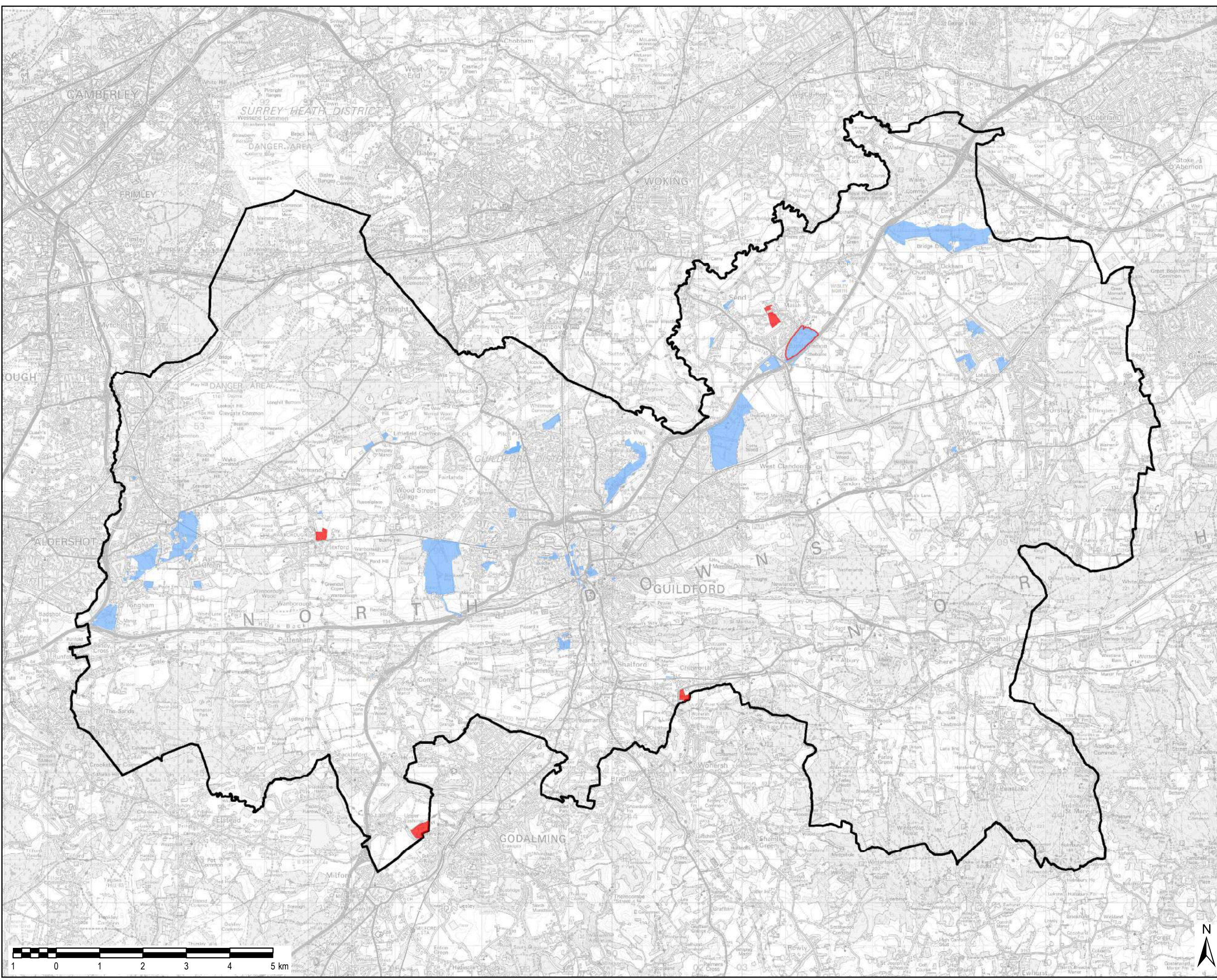
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File Name: Z:\Projects\Guildford SA 60537035\02_Maps\Figure 6 - Option 5 Liddington Hall Small Sites.mxd

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Project Title **GUILDFORD LOCAL PLAN SA**

Drawing Title **OPTION 6:
 AARON'S HILL
 SMALL SITES +**

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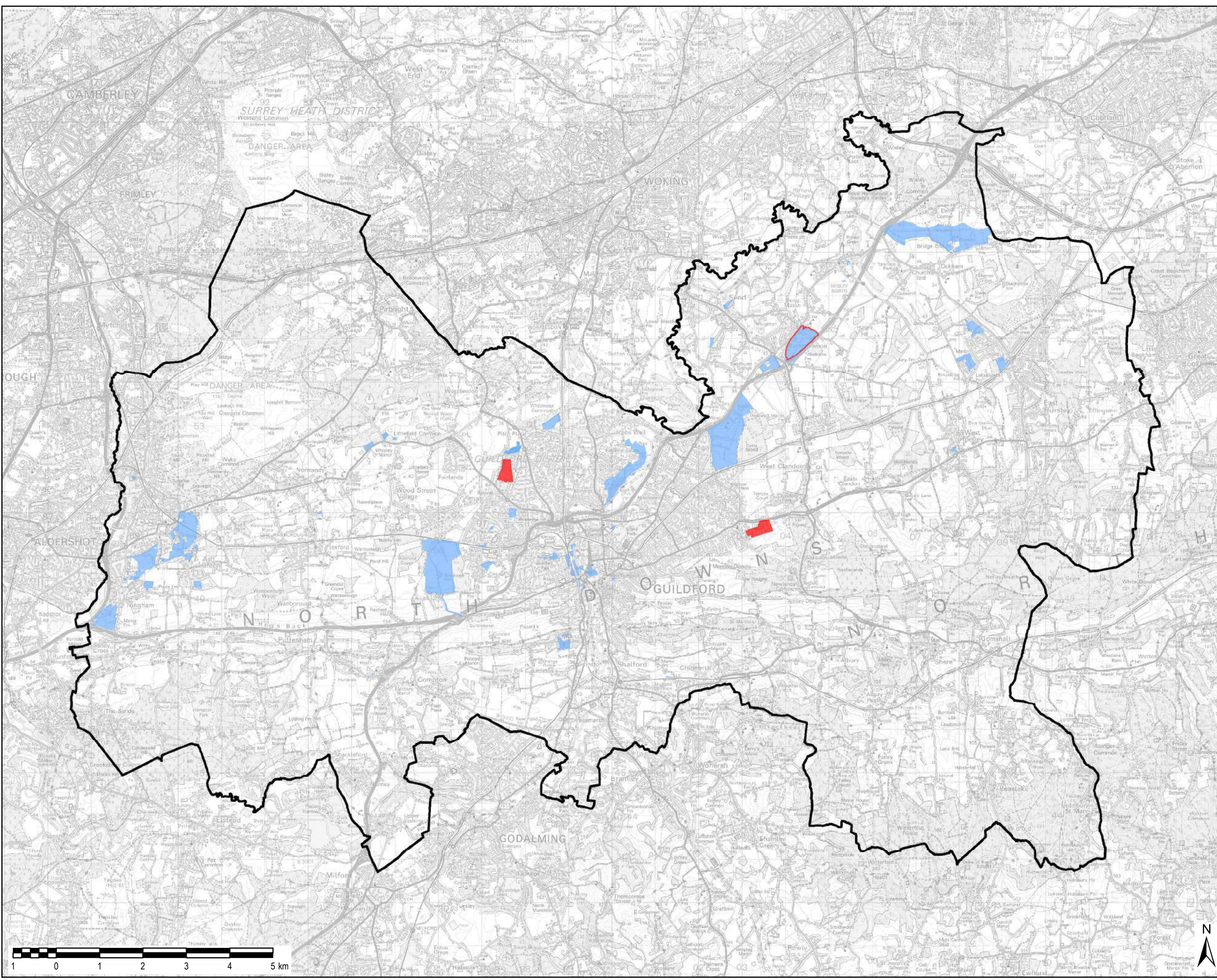
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Project Title **GUILDFORD LOCAL PLAN SA**

Drawing Title **OPTION 7:
 CLANDON GOLF
 LIDDINGTON HALL**

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File Name: Z:\Projects\Guildford SA 60537035\02_Maps\Figure 8 - Option 7 Clandon Golf Liddington Hall.mxd

6 APPRAISING REASONABLE ALTERNATIVES

6.1 Summary appraisal findings

6.1.1 **Table 6.1** presents summary appraisal findings in relation to the alternatives introduced above. Detailed appraisal findings are presented in **Appendix I**.

6.1.2 Detailed appraisal methodology is explained in Appendix I, but in summary:

The appraisal table comprises 21 rows - one for each of the sustainability topics that make up the SA framework (see Table 3.1). Within each row the alternatives are categorised in terms of potential to result in 'significant effects' (using **red** / **green**) and also ranked in order of relative performance (with '=' used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them).²²

²² Red shading is used to indicate significant negative effects, whilst green shading is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given uncertainty regarding how policy will be implemented in practice. 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 policy will be implemented 'on the ground' and what the effect on particular receptors will be. 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'. It is also important to note that effects are predicted taking into account the criteria presented within Schedules I and II of the Environmental Assessment of Plans and Programmes (SEA) Regulations [2004]. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. effects resulting from the development in combination with other on-going or planned activity).

Table 6.1: Summary appraisal of the reasonable additional housing scenarios

Topic	Rank of performance / categorisation of effects						
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd ton Hall
Biodiversity	2	3	2	★1	2	2	2
Climate change	★1	★1	3	4	4	4	2
Communities	★1	2	2	3	3	3	3
Economy	=						
Employment	=						
Flooding	=						
Health	=						
Historic environment	2	2	2	2	2	3	★1
Housing	3	3	2	3	3	★1	2
Land	2	2	2	2	2	2	★1
Landscape	2	★1	2	3	2	2	2
Poverty	=						
Brownfield	2	2	2	★1	★1	★1	2
Rural	=						
Safety	=						
Transport	★1	★1	3	4	4	4	2
Water	=						

Topic	Rank of performance / categorisation of effects						
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd ton Hall

Conclusion

The first key point to note is that there is little or no potential to confidently differentiate the relative merits of the alternative scenarios in respect of a number of objectives, and that ‘significant effects’ are predicted for two topics only. This reflects the fact that the quanta of homes that would be delivered under each is relatively low (650 homes in total, comprising 550 in the first five years post adoption, plus an additional 100 in the middle part of the plan period). N.B. it is important to emphasise that the submission allocations are not being appraised here, i.e. they form an element of the baseline, for the purposes of this appraisal.

The second key point to note is the identical order of preference under two topic headings: ‘Climate change’, and ‘Transport’. The same broad issue is the focus of discussion under all of these headings, namely ability to access key destinations - i.e. services/facilities and employment - via walking, cycling and public transport (or via short car journeys). This is a key issue, which enables differentiation between the scenarios. The broad conclusion is that the extensions to larger settlements are favoured over the village extensions, and that Aaron’s Hill is the preferable larger site, reflecting its proximity to Godalming town centre and station.

Thirdly, there is a need to make a contextual point, namely that the appraisal does generally find that the sites comprising the scenarios tend to impact on their local area in isolation, with limited in-combination impacts (with the discussion under ‘housing’ being the notable exception). It follows that ranking of the alternatives does largely equate to a process of ‘tallying’ the performance of individual component sites.

Having made these initial points, the following bullet points consider other notable topic headings in turn -

- Biodiversity - Liddington Hall (in particular) and Aaron’s Hill are in proximity to a Special Protection Area (SPA), meaning that there would be a need to avoid/mitigate the impact of increased recreational pressure through delivery of Suitable Alternative Natural Greenspace (SANG). Certain of the smaller village sites are also constrained by proximity to nationally or locally designated sites.
- Communities - the Aaron’s Hill site is potentially associated with a degree of opportunity, noting that the site forms part of a larger cross-boundary site that together will deliver nearly 500 homes, albeit it is noted that a planning application has already been submitted for the Waverley Borough part of the site. The site is adjacent to an area that suffers from a degree of relative deprivation, and the potential to support the local primary school has been identified. SANG proposals associated with the scheme are also of note.
- Historic environment - the part of the Aaron’s Hill cross-boundary site that falls within Waverley Borough has been found to be constrained by proximity to Grade II* listed Westbrook House and Registered Park/Garden; however, it seems likely that the Guildford Borough part of the site is less constrained in this respect. The two Send Marsh sites are also notable for being in proximity to a cluster of listed buildings.
- Housing - all of the alternatives would meet the objective of providing for 550 additional homes within the first five years post plan adoption, and hence would lead to significant positive effects. It is also the case that all have been selected, for appraisal, for the very reason that they are associated with a low risk of unforeseen delays to housing delivery. However, there is some variation / potential to differentiate, with Option 6 favoured as a higher growth option that would deliver the best geographical spread of sites.
- Landscape - all sites are subject to constraint, e.g. due to AGLV (Aaron’s Hill, Clandon Golf and Hornhatch Farm), Green Belt sensitivity (all sites other than Alderton’s Farm comprise ‘red-rated’ Green Belt) and/or sensitive views from roads / public rights of way (notably Aaron’s Hill and Land at Polesdon Lane; also potentially Liddington Hall). It is a challenge to differentiate the alternatives, but on balance the ranking reflects an understanding that Liddington Hall is relatively unconstrained, whilst Aaron’s Hill will complete a cross-boundary development, and in turn enable a robust, defensible Green Belt boundary.
- Brownfield - the ranking reflects the fact that Land at Polesden Lane, Send Marsh, includes an element of brownfield (i.e. previously developed) land.

In **conclusion**, all alternatives are associated with certain ‘pros and cons’. The intention is for the Council, and stakeholders (through the consultation on proposed modifications) to take this understanding into account when considering how best to ‘trade-off’ between / balance the competing objectives.

7 DEVELOPING THE PREFERRED APPROACH

7.1 Introduction

7.1.1 The aim of this Chapter is to present the Council's response to the alternatives appraisal, i.e. the Council's 'outline reasons' for selecting its preferred approach (to additional housing allocations) in-light of alternatives.

7.2 The Council's outline reasons

7.2.1 The following text was provided by the Council -

"The Council's preferred option is Option 3, which involves Aaron's Hill, Godalming (200 homes), Land at Alderton's Farm, Send Marsh Road, Send Marsh (120 homes), Land east of Glaziers Lane, Flexford (105 homes) and Land at Hornhatch Farm, New Road, Chilworth (80 homes), leading to a total of 555 additional homes being delivered in the first five years of the plan. In addition, an additional 150 homes is supported at the Garlick's Arch submission allocation (50 in the first five years) to ensure that best use is made of this site.

In summary, the proposed package of additional site allocations involves one larger urban extension to a main settlement (Aaron's Hill, Godalming) alongside a package of smaller extensions to villages which, whilst being located at Tier 9 settlements (i.e. at the bottom tier of the spatial hierarchy) are associated with strong delivery certainty. In this respect, the proposed package of additional site allocations reflects the desire to align with the spatial strategy as far as possible whilst recognising the need to apply flexibility in response to competing objectives.

The appraisal does not identify Option 3 as performing notably well in terms of any of the topic headings, but equally it is not identified as performing notably poorly in terms of any topic. It performs jointly least well in terms of two topic headings - 'land' and 'brownfield', but no major concerns are highlighted.

Focusing on Aaron's Hill, in addition to benefiting from very good accessibility to Godalming town centre and train station, the site performs well in Green Belt terms, noting that allocation of this site, alongside the adjacent site within Waverley Borough (the site can alternatively be considered as a single-cross boundary site), will deliver a robust/defensible long term Green Belt boundary. Also, the beneficial impacts of the development on the local primary school are of note especially given this is an area of relative deprivation.

The Council recognises that there are certain issues and sensitivities associated with the site, including in respect of SANG provision, and has proposed site specific policy accordingly. Policy is also proposed that seeks to ensure successful integration with the adjoining development site within Waverley Borough (noting that the size of the combined Guildford/Waverley scheme is 462 homes).

More generally, it is recognised that all of the proposed additional allocations are associated with certain issues/impacts, but there is confidence that the proposed package of sites represents sustainable development on balance, and there is confidence in the ability to suitable avoid or mitigate effects (and capitalise on opportunities) through the development management process."

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

8 INTRODUCTION (TO PART 2)

- 8.1.1 The aim of this part of the report is to present appraisal findings in relation to the proposed modifications (to the plan as submitted) that are currently published for consultation.
- 8.1.2 Before presenting the appraisal, there is firstly a need to discuss methodology and also list proposed modifications that can be 'screened-out' from detailed appraisal.

8.2 Methodology

- 8.2.1 The appraisal identifies and evaluates 'likely significant effects' of proposed modifications on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Table 3.1) as a methodological framework.
- 8.2.2 The focus of the appraisal is on the **proposed modifications** (given that it is the proposed modifications that are currently the focus of consultation); however, explicit consideration is also given to the effects of **the Local Plan as modified** (i.e. the cumulative effects of the proposed modifications and the rest of the Local Plan as submitted).
- 8.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to plan implementation and which/how aspects of the baseline would be impacted.
- 8.2.4 Assumptions are made cautiously, and explained within the text. The aim is to strike 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 effects in more general terms.
- 8.2.5 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.²³ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as appropriate. Cumulative effects are also considered, i.e. effects that become apparent once the effects of the proposed modifications / the submission plan plus modifications are considered in a wider context.

8.3 Screening the proposed modifications²⁴

- 8.3.1 Of the 48 proposed modifications, the following can be screened-out, on the basis that they have limited substantive implications (i.e. are not likely to result in significant effects) -
- MM1 (Clarification of NPPF requirement)
 - MM8 (Minor change to monitoring indicator)
 - MM13 (Summary table of retail allocations moved from policy E7 to E1)
 - MM22 (Policy deleted, with text moved to policy D1)
 - MM24 (Clarifies the NPPF approach to designated heritage assets)
 - MM27 (Minor change to description of measures to deliver car free site)
 - MM43 (New housing trajectory, which is a consequential change to SS2 mods)
 - MM44 (Detailed changes to the extent of designated shopping frontages)
 - MM46 (List of superseded policies)
- 8.3.2 The remaining proposed modifications ('MMs') are discussed within the appraisal below.

²³ Environmental Assessment of Plans and Programmes Regulations 2004

²⁴ To reiterate, the focus is on 'main' modifications only.

9 APPRAISAL OF PROPOSED MAIN MODIFICATIONS

9.1 Introduction

- 9.1.1 This section presents an appraisal of the ‘screened-in’ proposed modifications. Also, consideration is given to the effects of ‘the submitted plans plus proposed modifications’.
- 9.1.2 The appraisal is presented below under 17 topic headings (‘the SA framework’), with each topic-specific narrative split using three sub-headings.

9.2 Biodiversity

Proposed modifications

- 9.2.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, additional allocation of Aaron’s Hill, Godalming (200 homes) gives rise to a degree of concern due to the proximity of designated habitats, and in particular the Wealden Heaths Special Protection Area (SPA); however, there is confidence in the ability to suitably avoid or mitigate impacts. Recent discussions have confirmed that the land-owner will make a nearby field available for a large (16.7 ha) Suitable Alternative Natural Greenspace (SANG). See further discussion of the SANG proposals/issues within Appendix I.
- 9.2.2 With regards to the three proposed additional smaller village extensions there are fewer concerns, although Alderton’s Farm, Send (120 homes) is notable for being within 400m of Papercourt Site of Special Scientific Interest (SSSI). Also, Glaziers Lane, Flexford (105 homes) is within c.2km of the Thames Basin Heaths Special Protection Area (TBHSPA); however, there is sufficient SANG capacity at Russell Place Farm, to the west of Guildford.
- 9.2.3 Finally, there is a need to consider the proposal to deliver an additional 150 homes within the Garlick’s Arch submission allocation (which is not a focus of discussion within Chapter 6 / Appendix I). The site includes two small patches of ancient woodland, and also a stream that forms part of the River Wey BOA; however, there is little reason to suggest that the area of green infrastructure delivered within the site will be reduced as a result of the proposal to deliver an additional 150 homes.
- 9.2.4 With regards to proposed site specific policy to guide delivery of the additional supply -
- **MM36** proposes a policy for Aaron’s Hill (A61), which requires a comprehensive approach to avoiding impacts to the SPA, and also requires: *“Comprehensive masterplanning of the site to ensure that development is successfully integrated with the adjoining development site within Waverley borough and the surrounding landscape context.”* The latter requirement could have positive implications for green infrastructure delivery.
 - **MM38** proposes modifications to the submission policy for Garlick’s Arch (A43), with the following additional policy requirement of note: *“Increased landscaped buffer/strategic planting with frontage development set back from the A3 with significant additional measures to mitigate the visual impact of development in this location.”* The increased land-take needed to deliver this landscaping, in combination with the additional 150 homes, could *feasibly* lead to increased pressure on the ancient woodland within the site.
 - **MM44, MM45 and MM46** propose policies for the other three proposed additional allocations, with no requirements proposed in respect of biodiversity, other than that any Alderton’s Farm scheme must avoid “unacceptable impact on trees and hedgerows”.
- 9.2.5 The following other proposed modifications have notable biodiversity implications -
- **MM12** (Policy P5: Thames Basin Heaths Special Protection Area) - clarifies that the requirement is to agree SANG provision *in consultation with* Natural England.

- **MM23** (Policy ID1: Infrastructure and delivery) states: *“In allocating developer infrastructure contributions, we will prioritise Thames Basin Heaths Special Protection Area mitigation and avoidance in order to ensure that we meet our legal duties.”*
- **MM26** (Policy ID4: Green and blue infrastructure) - adjustments are made to the discussion of net gains in biodiversity, with a degree of flexibility added. The latest proposal is that net gains should be ‘an aim... where possible’.
- **MM37** (Policy A35: Former Wisley airfield, Ockham) requires that: *“Every effort must be made to reduce the harm to the [Site of Nature Conservation Importance, SNCI] through appropriate avoidance and mitigation measures.”* This reflects MM47.
- **MM47** (Map of former Wisley Airfield site) - amends the Site of Nature Conservation Importance (SNCI) boundary, following a recommendation from the Inspector that the designation be removed from the developable area. Further discussions have been undertaken with Surrey Wildlife Trust regarding this and an amendment has been made which more accurately reflects those parts of the site that are to be afforded protection for their SNCI value.

The submission plan plus proposed modifications

9.2.6 The SA Report Update (2017) concluded the following in relation to the submission plan -

“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).

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).

*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).”*

9.2.7 This conclusion broadly holds true for the submission plan plus proposed modifications, with the additional allocations giving rise to limited concerns, given that the Aaron’s Hill allocation is set to deliver a large SANG. However, it is fair to conclude that the plan does perform less well, as a result of the proposed modifications, in particular given the proposed amendments to the Wisley Airfield new settlement allocation (MM37 and MM47).

9.3 Climate change

Proposed modifications

- 9.3.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In respect of greenhouse gas emissions from the built environment, the focus on smaller sites is not ideal (as small sites will not have the necessary critical mass to deliver low carbon infrastructure, e.g. combined heat and power generation). In respect of greenhouse gas emissions from transport, the largest of the allocations (Aaron's Hill, Godalming; 200 homes) is supported, as there is good access from the site to Godalming town centre and train station, and there is also a good bus service available in close proximity; however, the three additional village extension allocations perform less well, with limited or no facilities in walking distance (and limited access to public transport in the case of Alderton's Farm, Send). It is **recommended** that detailed consideration is given to walking/cycling links at Alderton's Farm, including to the Send Primary School and the GP surgery, and to bus services on the Portsmouth Road.
- 9.3.2 Finally, there is a need to consider the proposal to deliver an additional 150 homes within the existing (submission) Garlick's Arch site (which is not a focus of discussion within Appendix I). The scheme will now comprise 550 homes in total, which could potentially lead to sufficient critical mass to make delivery of low carbon infrastructure (e.g. combined heat and power generation) viable. Under Policy D2 any site of at least 300 dwellings must demonstrate that (C)CHP has been given adequate consideration as the primary source of energy; however, it is nonetheless **recommended** that site-specific opportunities are explored. There might feasibly be some opportunity resulting from the proposal to double the quanta of industrial floorspace delivered at nearby Burnt Common Warehouse (MM39).
- 9.3.3 With regards to proposed site specific policy to guide delivery of the additional supply -
- **MM36** proposes a policy for Aaron's Hill (A61), which requires a comprehensive approach to developing the site alongside the adjoining development within Waverley Borough (see further discussion above, under 'biodiversity'), which is an important consideration from a walking/cycling perspective, as the direct route to Godalming town centre and railway station involves passing through the Waverley Borough site. The policy also requires improvements to the bridleway connecting Halfway Lane and New Way (in Waverley Borough) for pedestrians and cyclists, which is a key route linking the site to the town centre (it passes through a valley woodland and is proposed to be delivered as SANG).
 - **MM38** proposes modifications to the submission policy for Garlick's Arch (A43), with a new 'Transport Strategy' proposed including the requirement to deliver "*permeability for pedestrians and cyclists into and from the development particularly to/from the B2215 Portsmouth Road*" and a proportionate contribution towards "*an off-site walking and cycle network to the village centre of Send, the Burnt Common Warehouse site and Clandon railway station.*"
 - **MM44, MM45 and MM46** propose policies for the other three proposed additional allocations, with no requirements proposed in respect of walking, cycling or use of public transport (or in respect of any other climate change mitigation related considerations).
- 9.3.4 The following other proposed modifications have notable climate change implications -
- **MM3** (Policy S3: Delivery of development and regeneration within Guildford Town Centre) - sets a positive framework to guide windfall development including the requirement that: "*Major applications will be expected to deliver a mix of uses and include residential development.*" Also, it is anticipated that this policy will helpfully frame future strategy-making for the town centre, thereby helping to ensure that the next Local Plan is well placed to capitalise on growth opportunities. This is an important consideration, as maximising growth in the town centre is a key means by which per capita greenhouse gas emissions (from both transport and the built environment) might be minimised.

- **MM14** (Policy E2: Location for new employment floorspace) - provides additional support for Strategic Employment Sites, in that they are placed on a par with Guildford town centre, in respect of locational suitability. This could feasibly have negative implications in respect of 'sustainable transport'; however, in practice effects would be very minor.
- **MM15** (Policy E3: Maintaining employment capacity and improving employment floorspace) - makes some adjustments to the criteria that must be met before employment land is redeveloped for residential. Importantly, the following text is proposed: *"Redevelopment or change of use to a non-employment use will only be acceptable where the land or premises are unsuitably located in terms of its impact on the environment, levels of traffic movement, its accessibility to public transport and its link with the infrastructure, and its impact on the amenity of the area or adjoining occupiers."*
- **MM18** (Policy E7: Retail and leisure uses in Guildford Town Centre) - makes the following statement to complement Policy S3: *"In order to strengthen the liveliness and economic resilience of Guildford town centre, new retail and leisure uses located within the centre will be supported. Where no suitable sites are available within the centre, sites on the edge of the centre will be considered."*
- **MM23** (Policy D2: Sustainable design, construction and energy) - proposes deletion of the submission 'heating and cooling hierarchy' and replacement with a requirement for qualifying development proposals to *"demonstrate that [combined cooling, heating and power] has been given adequate consideration as the primary source of energy."* This potentially equates to a weakening of the policy; however, an alternative interpretation is that it helpfully increases flexibility. Importantly, a key requirement of the policy is proposed to be strengthened, with the proposal now that: *"New buildings must achieve a reasonable reduction in carbon emissions of at least 20 per cent below the relevant Target Emission Rate (TER) set out in the Building Regulations 2010 (as amended) (Part L)."* A further modification aims to make the policy more effective by allowing the use of fabric improvements when meeting the 20% reduction target (with the submission policy having anticipated reductions through "renewable and low carbon energy technologies" only).
- **MM25** (Policy ID3: Sustainable transport for new developments) - deletes reference to 'controlled parking zones' from the policy, with the following explanation added to the supporting text -

"With respect to vehicular parking, the policy takes account of the NPPF at paragraph 106. This allows for maximum parking standards to be set where there is a clear and compelling justification that they are necessary for optimising the density of development in town centres that are well served by public transport. The Council will bring forward a Parking Supplementary Planning Document. The policy does not preclude developers from bringing forward proposals for car-free new development..."

... Guildford Borough Council proposes to engage with Surrey County Council, the Local Highway Authority, to investigate the potential to amend the Traffic Regulation Order that supports the Guildford town centre Controlled Parking Zone. The forthcoming parking review may provide an opportunity to consider permit eligibility issues, particularly for new developments in areas within of the Controlled Parking Zone where existing residents' demand exceeds the supply of spaces prioritised for their use. The possible exclusion of new developments, and any other restrictions on permit eligibility, would operate outside of the planning system."
- **MM27** (Policy A3: Land between Farnham Road and the Mount, Guildford) deletes reference to *"a legal agreement preventing residents from applying for a resident's parking permit"*, but retains the requirement for a car free site.
- **MM28** (Policy A6: North Street redevelopment, Guildford) - adds some flexibility such that the number of homes delivered on the site might be increased beyond 400, should updated evidence show reduced need for retail floorspace. As a town centre site, this is supported.

- **MM29** (Policy A60: White Lion Walk, High Street, Guildford) - requires a car free development (N.B. this site was included within the submission housing supply, i.e. it is not a new site; it is just the proposed policy that is new).
- **MM32** (Policy A25: Gosden Hill Farm, Merrow Lane, Guildford) - clarifies that land must be made available for the proposed new rail station (in addition to a proportionate contribution towards the provision of the station).
- **MM39** (Policy A58: Land around Burnt Common warehouse, London Road, Send) proposes “[p]ermeability for pedestrians and cyclists into and from the development” and also a “proportionate contribution towards an off site walking and cycle network to the village centre of Send... and Clandon railway station.”

The submission plan plus proposed modifications

9.3.5 The SA Report Update (2017) concluded the following in relation to the submission plan -

*“The plan leads to a reasonably strong likelihood of reduced average per capita CO₂ 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.”*

9.3.6 This conclusion broadly holds true for the submission plan plus proposed modifications; however, the proposed modifications do possibly have negative implications for per capita implications, from both the built environment and from transport, in particular given the focus on distributing the additional homes across a package of smaller sites, including at villages.

9.4 Communities

Proposed modifications

9.4.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, the proposed additional allocation at Aaron’s Hill, Godalming (200 homes) is identified as a ‘positive’, from a communities perspective, whilst the additional allocation of the three smaller village extension sites have broadly neutral or ‘minor negative’ implications (with perhaps the primary concern being in relation to ‘in-combination’ impacts at Send, given several submission allocations, and also the proposed additional 150 homes at Garlick’s Arch, and the proposed increase to the quantum of industrial floorspace at Burnt Common Warehouse).

9.4.2 The Aaron’s Hill allocation would not deliver new or upgraded strategic community infrastructure; however, the allocation should help to secure the future of the nearby primary school,²⁵ and it is also noted that the Aaron’s Hill area is somewhat ‘relatively deprived’ in the Waverley/Guildford context. It might also be the case that allocation of the site in conjunction with the adjacent site in Waverley Borough could support a more comprehensive scheme (e.g. the village green proposed at the western edge of the WBC site could presumably extend into the GBC site). Finally, there is a need to note the latest proposals in respect of SANG delivery, as discussed above, under ‘Biodiversity’.

²⁵ A Green Oak Primary School Consultation Closure Document was produced by Surrey County Council in March 2018. This explains that the school currently has 93 pupils, with 117 places untaken (i.e. the school’s capacity is 210 pupils). It is anticipated that the Aarons Hill development within Waverley Borough will result in an additional 63 children attending the school (as confirmed by Surrey County Council) and it is anticipated that a similar number (pro rata) will arise from the Guildford development. Accordingly the ‘additional’ Guildford development will further assist in sustaining the pupil numbers of the school as a 1 FE Primary School.

N.B. an earlier version of this appraisal **recommended** that the potential for a joint application be explored. The Council's has responded that: *"On the advice of both WBC and GBC the developers undertook a Design South East Review Panel (see www.designsoutheast.org) exercise in 2018, as part of which they looked at an indicative masterplan for the whole site."*

9.4.3 Also, there is a need to consider the proposal to deliver an additional 150 homes at Garlick's Arch, Send Marsh. This is notable from a 'communities' perspective, given the potential for in-combination effects (discussed above, in relation to Alderton's Farm); however, it is noted that **MM38** proposes the following site-specific policy requirement: *"Necessary and proportionate contribution towards mitigation schemes to address the otherwise adverse material impacts on communities and the environment, including in Send, West Clandon and Ripley"*

9.4.4 Also, with regards to proposed site specific policy to guide delivery of the additional supply, **MM36** proposes a policy for Aaron's Hill (A61), which requires a comprehensive approach to developing the site alongside the adjoining development within Waverley Borough (see further discussion above, under 'biodiversity'). This is an important consideration from a communities perspective, recognising the need for the new community to integrate effectively with the existing adjacent community.

9.4.5 The following other proposed modifications have notable communities implications -

- The proposal is to supplement several site specific policies (**MM30, MM32, MM33, MM37**) with the following requirement: *"Create unique places that combine the highest standards of good urban design with well designed streets and spaces."* This text was previously listed, for each of the sites in question, as an 'opportunity'.
- **MM32** (Policy A25: Gosden Hill Farm, Merrow Lane, Guildford) and **MM33** (Policy A26: Blackwell Farm, Hogs Back, Guildford) both add the following requirement: *"The location of a secondary school should be carefully considered so as to ensure convenient access from the proposed Park and Ride / public transport."*
- **MM45** (Appendix C: Infrastructure schedule) - requires a traffic management and environmental improvement scheme targeted at the junction of the A247 Clandon Road and The Street (West Clandon).

The submission plan plus proposed modifications

9.4.6 The SA Report Update (2017) concluded the following in relation to the submission plan -

*"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'."*

9.4.7 This conclusion broadly holds true for the submission plan plus proposed modifications. The proposed additional allocation at Aaron's Hill is supported, although there are potentially some concerns regarding the additional focus of growth at Send / Send Marsh.

9.5 Economy and employment

Proposed modifications

9.5.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, there are limited implications. None of the proposed additional sites would deliver new employment land; and, whilst additional housing is potentially supported from a perspective of ensuring a sufficient local workforce, any benefits will be minor given the number of homes involved.

- 9.5.2 The following other proposed modifications have notable implications -
- **MM3** (Policy S3: Delivery of development and regeneration within Guildford Town Centre) - does not have an explicit focus on developing the economy/employment potential of the town centre, but is supportive of mixed-use developments, and more generally should provide a helpful framework to guide future planning within this key location.
 - **MM14** (Policy E2: Location for new employment floorspace) - seeks to add a degree of flexibility, and in doing so support timely delivery of new employment development.
 - **MM15** (Policy E3: Maintaining employment capacity and improving employment floorspace) deletes Guildford town centre from the list of Strategic Employment Sites; and supports the provision of ancillary uses *“that complement and positively enhance the functioning of the employment area will be supported.”*
 - **MM16** (Policy E4: Surrey Research Park) - seeks to add a degree of flexibility, by removing the requirement for employment uses to be “science-related”. In practice, it is not considered that this leads to any risk of the Research Park’s science focused being diluted over time, recognising that the University is the land-owner.
 - **MM39** (Policy A58: Land around Burnt Common warehouse, London Road, Send) - increases the quantum of new employment land to be delivered from 7,000 m² to 14,800m². Furthermore, the supporting text explains that:
“An initial masterplan for the site has shown that it has a total capacity for more than 14,800 sq m. However, the ELNA anticipates that approximately this amount will be required over the Plan period to 2034 to meet identified needs. The ELNA will be updated every three years and if updates show a higher need for industrial class floorspace, this site would be able to provide a larger amount either within or after the Plan period.”

The submission plan plus proposed modifications

- 9.5.3 The SA Report Update (2017) concluded the following in relation to the submission plan -
- “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.**”*
- 9.5.4 This conclusion broadly holds true for the submission plan plus proposed modifications, and if anything the effect of proposed modifications may be marginally beneficial, with employment policies E2-E3 now proposed to be slightly less restrictive, in terms of both the sequential approach to directing development to preferred locations and in allowing existing users more scope for expansion. The deletion of Guildford town centre from the list of Strategic Employment Sites in policy E1 to provide greater flexibility for mixed use redevelopment is of note; however, there are no concerns regarding the potential for the town centre to continue to thrive as an employment location, in particular given new proposed Policy S3.

9.6 Flooding

Proposed modifications

- 9.6.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, there are limited implications, with the proposed additional village extension allocation at Glaziers Lane, Flexford (105 homes) most notable, in that there is a degree of surface water flood risk at the site’s eastern extent.

9.6.2 Finally, there is a need to consider the proposal to deliver an additional 150 homes within the existing (submission) Garlick's Arch site (which is not a focus of discussion within Appendix I). The site is bisected by a stream; however, there is no reason to suggest that an additional 150 homes will necessitate housing in an area of fluvial flood risk, nor have any significant implications for surface water flood risk or the land available to deliver drainage systems.

9.6.3 With regards to other proposed modifications, only **MM11** (Policy P4: Flooding, flood risk and groundwater protection zones) is of note, with the proposed additional requirement that "there will be no increase in development vulnerability" as a result of development proposals in the 'developed' flood zone 3b. This accords with national planning guidance and takes account of advice from the Environment Agency. It is an important consideration for the town centre.

The submission plan plus proposed modifications

9.6.4 The SA Report Update (2017) concluded the following in relation to the submission plan -

*"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."*

9.6.5 This conclusion broadly holds true for the submission plan plus proposed modifications.

9.7 Health

Proposed modifications

9.7.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, no major concerns are highlighted, noting that all sites would enable access to a GP surgery, although there are certain concerns in respect of car dependency / active travel (see discussion above, under 'climate change'). It is also the case that there is no reason to suggest that the quantum of additional housing growth proposed, or the spatial distribution, will have implications for air quality within any known problem area (noting that, whilst there are no designated Air Quality Management Areas, AQMAs, an Air Quality Review has identified certain problem areas).

9.7.2 With regards to other proposed modifications, of greatest note is **MM19** (Policy E8: District Centres; and Policy E9: Local Centres and isolated retail units), which propose deletion of the following requirement: "*Proposals for new hot food takeaways (Use Class A5) within 500m of schools will not be accepted because of the potential negative impact on the health of school children.*" The concern is that the previously proposed policy requirement would not be effective, in that it would be challenging to implement.

The submission plan plus proposed modifications

9.7.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

*"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."*

- 9.7.4 This conclusion broadly holds true for the submission plan plus proposed modifications, although the removal of restrictions on hot food takeaways conflicts with health objectives.

9.8 Historic environment

Proposed modifications

- 9.8.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, the proposed additional allocations at Aaron's Hill, Godalming (200 homes) and Alderton's Farm, Send Marsh (120 homes) are potentially constrained by proximity to listed buildings (including Grade 2* listed Westbrook House, in the case of Aaron's Hill), but there is good certainty regarding the potential to suitably avoid or mitigate effects, through layout, landscaping and design measures.
- 9.8.2 **MM10** (Policy P3: Countryside) removes the previously proposed new area of Green Belt to the south of Ash and Tongham; however, **MM35** (Policy A29: Land to the south and east of Ash and Tongham) proposes the following additional requirement -

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green...”

The submission plan plus proposed modifications

- 9.8.3 The SA Report Update (2017) concluded the following in relation to the submission plan -
- “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.**”*
- 9.8.4 This conclusion broadly holds true for the submission plan plus proposed modifications. It is difficult to conclude that the proposed modifications have negative implications on the whole, on the assumption that avoidance/mitigation policy is fully implemented.

9.9 Housing

Proposed modifications

- 9.9.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, the proposed approach performs well as it will ensure that the housing target (as recently decided during the examination hearings session on 3rd July) is achieved, with a smooth trajectory of housing delivery (as opposed to the 'stepped' trajectory proposed by the submission plan). See further discussion in Section 5.2, above. Furthermore, there is confidence in the robustness of the housing trajectory on the basis of the proposed distribution of additional allocations, in that the proposal is to rely on a package of five additional sites that are well spread geographically, rather than one or two larger sites, thereby minimising the risk of delayed delivery leading to concerns for the district-wide housing trajectory.
- 9.9.2 The following other proposed modifications have notable housing implications -

- **MM3** (Policy S3: Delivery of development and regeneration within Guildford Town Centre) - is supportive of housing within the town centre, with the requirement that: *“Major applications will be expected to deliver a mix of uses and include residential development.”*
- **MM4** (Policy H1: Homes for all) - clarifies that: *“Significant reductions from the approximate housing numbers or reductions from the specific traveller accommodation provision and housing uses as set out in the site allocations will be resisted.”*
- **MM6** (Policy H2: Affordable homes) - seeks affordable housing delivery on sites with a yield of ten homes or more, rather than five homes or more. This does not give rise to major concerns, as the number of homes involved is low. The following new supporting text is also proposed, on the subject of development viability -
“Bearing in mind that viability assessment was undertaken in preparation of the Local Plan, the impact of policies on development viability have been considered and are regarded as realistic. The need for a viability assessment at planning application stage will thus need clear justification by the applicant in line with paragraph 57 of the NPPF. Should this need be accepted, the Council will need to weigh the outcomes and implications of the viability assessment against all circumstances relating to the case as part of considering the acceptability of the proposal.”
- **MM7** (Policy H3: Rural exception homes) removes the ability to deliver Gypsy and traveller pitches as a rural exception site, but adds that rural exception sites can deliver accommodation for “Gypsies and Travellers not meeting the Planning Policy for Traveller Sites definition of a gypsy or traveller”.
- **MM24** (Policy ID2: Supporting the Department for Transport’s “Road Investment Strategy”) commits the Council to an early review of the Local Plan, should key road infrastructure upgrades be delayed, on the basis that these infrastructure delays would lead to delayed housing delivery.
- **MM29** (Policy A60: White Lion Walk, High Street, Guildford) - requires a mixed-use redevelopment, comprising approximately 50 homes (C3) and comparison retail floorspace (A1). N.B. this site was included within the submission housing supply, i.e. it is not a new site; it is just the proposed policy that is new.
- **MM32** (Policy A25: Gosden Hill Farm, Merrow Lane, Guildford) reduces the scale of the allocation including the traveller allocation, which is reduced from eight to six pitches.

The submission plan plus proposed modifications

9.9.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

*“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.”*

9.9.4 This conclusion broadly holds true for the submission plan plus proposed modifications, and indeed the proposed modifications have a significant beneficial effect in that the proposal is now to provide for an element (20%) of Woking Borough’s unmet needs, in addition to providing for Guildford Borough’s Objectively Assessed Housing Needs (OAHN) in full.

9.10 Land

Proposed modifications

9.10.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, the proposed package of additional allocations is perhaps less than idea on the basis that Alderton's Farm, Send Marsh (120 homes) is known to comprise 'best and most versatile' agricultural land. With regards to the other proposed additional allocations there is less certainty, as detailed surveys of agricultural land quality have not been completed.

9.10.2 No other proposed modifications have implications for 'land' objectives.

The submission plan plus proposed modifications

9.10.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

*"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."*

9.10.4 This conclusion broadly holds true for the submission plan plus proposed modifications, given that proposed additional allocations are all in agricultural use, and at least one of the sites comprises best and most versatile quality agricultural land.

9.11 Landscape

Proposed modifications

9.11.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, two of the proposed allocations - Aaron's Hill, Godalming (200 homes) and Hornhatch Farm, Chilworth (80 homes) - are notably constrained on the basis that they fall within the locally designated Area of Great Landscape Value (AGLV). Aaron's Hill is potentially more notable, as the larger site, and also noting that the Foxes Way long-distance path follows the site perimeter; however, views are already set to be impacted by the committed Waverley part of this cross-border site, and, with this being the case, the additional Guildford Borough allocation may in fact have some beneficial effects, in landscape terms.

9.11.2 With regards to proposed site specific policy to guide delivery of the additional supply -

- **MM36** proposes a policy for Aaron's Hill (A61) requiring: "Comprehensive masterplanning of the site to ensure that development is successfully integrated with the adjoining development site within Waverley borough and the surrounding landscape context."
- **MM38** proposes modifications to the submission policy for Garlick's Arch (A43), with the following additional policy requirement of note: "Increased landscaped buffer/strategic planting with frontage development set back from the A3 with significant additional measures to mitigate the visual impact of development in this location."
- **MM44, MM45 and MM46** propose policies for the other three proposed additional allocations, with all policies requiring sensitive design at site boundaries that has significant regard to the transition from village to greenfield, and the Hornhatch Farm scheme additional required to have significant regard to views from the AONB/AGLV.

9.11.3 The following other proposed modifications have notable landscape implications -

- **MM9** (Policy P2: Green Belt) involves a considerable re-write of the policy; however, this is presentational, i.e. there is no change in policy approach. Rewording is primarily in relation to the matter of infilling within villages that are inset within the Green Belt, and on this subject the following new supporting text is also proposed -

“There are a number of considerations to take account of when assessing whether a site is located within the village. This includes factors such as the pattern of development, and the proposed development’s relationship to the built up area of the village and the surrounding countryside.”

- **MM10** (Policy P3: Countryside) - removes the previously proposed new area of Green Belt to the south of Ash and Tongham; however, the proposal is to add policy wording to ensure that future development does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Ash Green. New supporting text explains that -

“Significant growth is planned to occur to the south eastern corner of the previously defined Ash and Tongham urban area. Whilst an element of merging will occur between the urban area and the northern extent of Ash Green village, it is important that this is limited to this area to protect the separate identities of these settlements. Any development within the remaining area of land that is designated countryside will be strongly resisted.”

- **MM22** (Policy D1: Place shaping) - is a new policy primarily comprising text moved from elsewhere in the document; however, new requirements are proposed in three respects. Firstly, requirements are established for development proposals at villages, including the need to have regard to *“the important relationship between the built development and the surrounding landscape.”* Secondly, policy requirements are established to guide development in the Ash/Tongham area *“[i]n order to avoid piecemeal development and to protect and enhance the existing character of Ash & Tongham and Ash Green”*. Thirdly, there is a new requirement for masterplanning of strategic sites.
- The proposal is to supplement several site specific policies (**MM30, MM32, MM33, MM37**) with the following requirement: *“Create unique places that combine the highest standards of good urban design with well designed streets and spaces.”* This text was previously listed, for each of the sites in question, as an ‘opportunity’.
- **MM32, MM38** and **MM39** - require additional measures at the three main sites along the A3 corridor, east of Guildford. Specifically, the requirement is for *“Increased landscaped buffer/strategic planting with frontage development set back from the A3 with significant additional measures to mitigate the visual impact of development in this location.”*
- **MM34** (Policy A26a: Land for access road between A31 Farnham Road and Blackwell Farm, Hogs Back, Guildford) - is a new policy with the potential for landscape impacts, given the location of the proposed access within the Area of Outstanding Natural Beauty (AONB). A stand-alone policy is now required due to the desire for a wider corridor to be removed from the Green Belt, ahead of determining the optimum route for the road. The policy requires the road, and its junction, to be *“sympathetic to its setting within and adjacent to the AONB and within the AGLV. The objective will be to achieve the best landscape and design solution, taking into account the topography, the existing trees, the need for additional landscaping, and the needs of all users, including walkers and cyclists as well as vehicles entering and leaving the site.”* The policy also states:

“Mitigation measures to reduce the landscape impact. This will include sensitive lighting, buffer planting, a construction management plan to avoid disturbance to wildlife during critical species periods, and a maintenance plan to ensure the establishment of proposed planting and the ongoing health of the existing landscape.”
- **MM39** (Policy A58: Land around Burnt Common warehouse, London Road, Send) increases the allocation from 7,000 sqm of industrial floorspace to 14,800 sq m; however, additional landscaping requirements are also introduced (discussed above).
- **MM48** (Policies map) - amends the Green Belt inset boundary at West Horsley (south) to follow an alternative boundary that is closer to the built up area following further consideration after the issue was raised at a hearing session.

The submission plan plus proposed modifications

9.11.4 The SA Report Update (2017) concluded the following in relation to the submission plan -

“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.

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.

*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.**”*

- 9.11.5 This conclusion broadly holds true for the submission plan plus proposed modifications. The proposed removal of the previously proposed additional Green Belt is of note, as is the proposal to remove a larger area of land from the Green Belt in order to facilitate the Blackwell Farm access road; however, it is difficult to conclude that the proposed modifications have negative implications on the whole, on the assumption that avoidance/mitigation policy is fully implemented.

9.12 Poverty and social exclusion

Proposed modifications

- 9.12.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, the conclusion is reached that the proposed additional allocations have few if any implications for the achievement of ‘poverty and social exclusion’ objectives.

- 9.12.2 No other proposed modifications have implications for the poverty and social inclusion.

The submission plan plus proposed modifications

- 9.12.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

*“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.**”*

- 9.12.4 This conclusion broadly holds true for the submission plan plus proposed modifications.

9.13 Previously developed land

Proposed modifications

- 9.13.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, the proposed additional allocations ‘perform poorly’, in that they are all greenfield sites; however, there are very few brownfield sites available and in contention for allocation (given the parameters that exist). One of the sites discussed in Chapter 5 / Appendix I - namely Land at Polesdon Lane & Send Marsh Road, Send Marsh (50 homes) - does comprise an element of brownfield land, but on balance is not supported by the Council.

- 9.13.2 No other proposed modifications have implications for previously developed land.

The submission plan plus proposed modifications

9.13.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

*“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.**”*

9.13.4 This conclusion broadly holds true for the submission plan plus proposed modifications, albeit the effect of proposed modifications is negative, recognising that the proposed additional allocations are all greenfield.

9.14 Rural economy

Proposed modifications

9.14.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, there are limited implications. The three proposed village extension sites (also the proposal to deliver an additional 150 homes at the submission Garlick’s Arch site) might potentially contribute to the rural economy to some extent, with Flexford being notably the smallest and most rural of the villages proposed to receive additional growth; however, it is difficult to identify any particular opportunities. There are no existing facilities in Flexford, and so it is not possible to argue that development would help to secure the long term future of village facilities, and hence contribute to village vitality in this way.

9.14.2 The only other proposed modification with notable implications is **MM17** (Policy E5: Rural economy), which adds ‘open space’ to the list of services and community facilities that should be retained and developed, in order to support the rural economy.

The submission plan plus proposed modifications

9.14.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

*“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.**”*

9.14.4 This conclusion broadly holds true for the submission plan plus proposed modifications.

9.15 Safety and security

Proposed modifications

9.15.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, there are limited implications. The proposed additional homes will be delivered as part of new communities, rather than as part of urban regeneration schemes. 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.

9.15.2 No other proposed modifications have implications for the poverty and social inclusion.

The submission plan plus proposed modifications

9.15.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

*“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.**”*

9.15.4 This conclusion broadly holds true for the submission plan plus proposed modifications.

9.16 Transport

Proposed modifications

9.16.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, there is little potential to build upon the analysis/discussion already presented under the ‘climate change’ heading, where the conclusion is that *“the largest of the allocations (Aaron’s Hill, Godalming; 200 homes) is supported, as there is good access from the site to Godalming town centre and train station, and there is also a good bus service available in close proximity; however, the three additional village extension allocations perform less well.”*

9.16.2 There is also the matter of seeking to avoid worsening of existing traffic congestion, and in this respect it is notable that the Aaron’s Hill site is supported as: *“Vehicle trips to/from Aarons Hill to/from the south (Portsmouth direction) will not pass through the Guildford section of the A3. Those travelling to/from the north towards London and the M25 motorway will use the Guildford section of the A3; however, they will be on the mainline carriageway through the A3 Guildford section and would not be leaving or joining the A3 Guildford at its junctions.”*

9.16.3 Focusing on the matter of traffic congestion, the following other proposed mods are of note -

- **MM38** (Policy A43: Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley) proposes the following additional policy requirement of note: *“Through vehicular link between the B2215 Portsmouth Road and the A247 Clandon Road to provide an alternative route that relieves pressure on Send Marsh roundabout “*
- **MM45** (Appendix C: Infrastructure schedule) - requires a traffic management and environmental improvement scheme targeted at the junction of the A247 Clandon Road and The Street (West Clandon).
- **MM34** (Policy A26a: Land for access road between A31 Farnham Road and Blackwell Farm, Hogs Back, Guildford) - aims to remove a wider corridor of land from the Green Belt, in order to ensure that the best route for a new access road can be achieved.

The submission plan plus proposed modifications

9.16.4 The SA Report Update (2017) concluded the following in relation to the submission plan -

*“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... 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.”*

9.16.5 This conclusion broadly holds true for the submission plan plus proposed modifications. The distribution of additional allocations is broadly supported, from a perspective of wishing to minimise worsening of traffic congestion, and three additional measures discussed at para 9.16.3 also strongly supported in this respect.

9.17 Waste

Proposed modifications

9.17.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2); however, it is not considered that there are any implications for waste management objectives. It should be possible to manage waste sustainably under any reasonably foreseeable scenario.

9.17.2 No other proposed modifications have implications for the poverty and social inclusion.

The submission plan plus proposed modifications

9.17.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

*“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.**”*

9.17.4 This conclusion broadly holds true for the submission plan plus proposed modifications.

9.18 Water quality and resources

Proposed modifications

9.18.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, there are limited implications, with no reason to suggest that any of the proposed additional sites are problematic in respect of drainage / water quality, wastewater transport and treatment or water supply.

9.18.2 Other proposed modifications of note are as follows -

- **MM32** (Policy A25: Gosden Hill Farm, Merrow Lane, Guildford) and **MM33** (Policy A26: Blackwell Farm, Hogs Back, Guildford) both add the following requirement: *“Minimise surface water flood risk through appropriate mitigation, to ensure that run-off from the site is no greater than run-off rates from the site before development.”*
- **MM37** (Policy A35: Former Wisley airfield, Ockham) adds the following policy requirement: *“Ensure that sufficient capacity is available within Ripley wastewater treatment works to accept wastewater from this development within its permitted limits.”*

The submission plan plus proposed modifications

9.18.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

*“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.**”*

9.18.4 This conclusion broadly holds true for the submission plan plus proposed modifications.

9.19 Conclusion

9.19.1 The following headline conclusions can be drawn from the appraisal -

- Biodiversity - the SA Report Update (2017) conclusion that the submission plan as a whole will not lead to significant negative effects broadly holds true for the 'submission plan plus proposed modifications', with the additional allocations giving rise to limited concerns, given that the Aaron's Hill allocation is set to deliver a large SANG. However, it is fair to conclude that **the proposed modifications do have negative implications**, in particular the proposed amendments to the Wisley Airfield new settlement allocation (MM37 and MM47).
- Climate change - the SA Report Update (2017) conclusion that the submission plan as a whole is supported, but will not lead to significant positive effects, broadly holds true for the submission plan plus proposed modifications; however, **the proposed modifications do possibly have negative implications** for per capita implications, from both the built environment and from transport, in particular given the focus on distributing the additional homes across a package of smaller sites, including at villages.
- Communities - the SA Report Update (2017) conclusion that the submission plan as a whole will lead to significant positive effects broadly holds true for the submission plan plus proposed modifications. The proposed additional allocation at **Aaron's Hill is supported**, although there are potentially some **concerns in respect of Send / Send Marsh**.
- Economy/employment - the SA Report Update (2017) conclusion that the submission plan as a whole will lead to significant positive effects broadly holds true for the submission plan plus proposed modifications, and if anything the effect of proposed modifications may be **marginally beneficial**, with employment policies E2-E3 now proposed to be slightly less restrictive, in terms of both the sequential approach to directing development to preferred locations and in allowing existing users more scope for expansion. The deletion of Guildford town centre from the list of Strategic Employment Sites in Policy E1 to provide greater flexibility for mixed use redevelopment is of note; however, the town centre economy should nonetheless continue to thrive, in-line with new proposed Policy S3.
- Health - the SA Report Update (2017) conclusion that the submission plan as a whole will not lead to significant effects (either positive or negative) broadly holds true for the 'submission plan plus proposed modifications', although the **removal of restrictions on hot food takeaways is potentially a retrograde step**.
- Historic environment - the SA Report Update (2017) conclusion that the submission plan as a whole will not lead to significant effects (either positive or negative) broadly holds true for the 'submission plan plus proposed modifications'. Whilst **additional sites lead to certain tensions**, a policy framework will be in place to ensure avoidance/mitigation.

9.19.2 In conclusion, the proposed modifications necessarily allocate additional sites, and support an intensification on certain sites, in order to ensure that housing and employment needs are met in full (also taking into account unmet needs), and that best use is made of sites removed from the Green Belt. This inevitably leads to certain tensions, in respect of environmental objectives in particular; however, it is evident that the Council - working with the Inspector - is seeking to strike an appropriate balance. Consultees and the Inspector may wish to take the appraisal findings presented within this report into account, when giving consideration to the possibility of making further adjustments to the plan/balance.

9.19.3 Consultees and the Inspector may also wish to note the three specific recommendations that are referenced within the appraisal (see bold text), which relate to: the proposed additional allocation at Alderton's Farm (emphasis on walking/cycling upgrades); the proposed additional allocation at Aaron's Hill (ideally a joint planning application might be pursued, with a view to delivering a comprehensive scheme, including in respect of SANG provision); and the proposed additional 150 homes at Garlick's Arch (it is recommended that site specific policy might address the matter of delivering low carbon infrastructure as part of the scheme, now that the proposed number of homes has reached 550, and also noting the proposal to double the quanta of industrial floorspace delivered at nearby Burnt Common Warehouse).

PART 3: WHAT HAPPENS NEXT?

10 INTRODUCTION (TO PART 3)

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

11 PLAN FINALISATION

11.1.1 Subsequent to the current modifications consultation the Inspector will consider all representations received, before then considering whether or not there is a need for further examination hearing sessions. In due course, the Inspectors will then prepare a report on the soundness of the Local Plan.

11.1.2 Assuming that the Inspectors are able to find the plan 'sound', it will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.

12 MONITORING

12.1.1 At the current time, there is a need to present 'measures envisaged concerning monitoring'.

12.1.2 The SA Report Update (2017) presented a list of the proposed monitoring indicators that were deemed to be of particular importance, in light of the appraisal of the plan presented within that report (see Table 13.1 of the SA Report Update).

12.1.3 At the current time, modifications to a number of the submission monitoring indicators are proposed; however, the great majority of proposed changes are relatively minor re-wordings. There are a number of instances of targets being removed (e.g. whereas previously the target was to see a reduction in the number of permissions granted despite acknowledged heritage impacts/issues, whereas now the proposal is to monitor this indicator without a stated target); however, this is not a major concern.

12.1.4 One new monitoring indicator of note is proposed. Specifically, it is now proposed to monitor the following indicator: *"Number of planning decisions, including appeals, granting permission which have been subject to assessment by a Design Review Panel."*

APPENDIX I: APPRAISAL OF REASONABLE ALTERNATIVES

The aim here is to present detailed appraisal findings in relations to the reasonable alternatives introduced in Section 5 and summarised below, expanding on the summary appraisal findings presented in Section 6. The reasonable alternatives are re-presented in the table below.

The appraisal is presented across 17 tables - one for each of the sustainability topics that make up the SA framework (see Chapter 2). Within each table the alternatives are categorised in terms of potential to result in 'significant effects' (using red / green) and also ranked in order of relative performance (with ' = ' used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them).²⁶

²⁶ Red shading is used to indicate significant negative effects, whilst green shading is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given uncertainty regarding how policy will be implemented in practice. 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 policy will be implemented 'on the ground' and what the effect on particular receptors will be. 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'. It is also important to note that effects are predicted taking into account the criteria presented within Schedules I and II of the Environmental Assessment of Plans and Programmes (SEA) Regulations [2004]. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. effects resulting from the development in combination with other on-going or planned activity).

The (reasonable) additional housing scenarios

	Option 1 Clandon Golf Aaron's Hill	Option 2 Lidd'ton Hall Aaron's Hill	Option 3 Aaron's Hill Small sites	Option 4 Clandon Golf Small sites	Option 5 Lidd'ton Hall Small sites	Option 6 Aaron's Hill Small sites +	Option 7 Clandon Golf Lidd'ton Hall
Constant							
							50
Variables							
							300
	Liddington Hall, Guildford	300			300		300
	Aaron's Hill, Farncombe	200	200	200		200	
Tier 10	Land at Polesdon Lane & Send Marsh Road, Send Marsh			50	50	50	
	Land at Hornhatch Farm, New Road, Chilworth			80	80	80	
	Land east of Glaziers Lane, Flexford			105	105	105	
	Land at Alderton's Farm, Send Marsh Road, Send Marsh			120		120	
Total additional homes (yrs 1 to 5)*	550	550	555	585	585	605	650
% over 550 home target			1%	6%	6%	10%	18%

* There is a need to reiterate two points. Firstly, these homes would be in addition to the land supply supported by the submission plan. Secondly, a further 100 additional homes are proposed at Garlick's Arch, but would be delivered in year 6.

Appraisal of the reasonable additional housing scenarios

Conserve and enhance **biodiversity** and the natural environment

	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	2	3	2	★1	2	2	2

Significant effects? **No**

Discussion

A primary consideration is the proximity of Liddington Hall (c.800m) to the Thames Basin Heaths Special Protection Area (TBHSPA), although it is anticipated that there would be provision of Suitable Alternative Natural Greenspace (SANG) to suitably mitigate recreational impacts.²⁷ Liddington hall is also notable for bordering an SNCI (Broadstreet Common), although this SNCI does not fall within a BOA. A further consideration is the density of footpaths that cross the site, which serves to suggest that the site could be popular for dog walking (noting that walks can also take in the adjacent common land), which is potentially an important consideration given the sensitivity of the TBHSPA to recreational impacts from dog walking.

A secondary consideration is the proximity of Aaron's Hill to the Wealden Heaths SPA (c. 2km to the west) and the 'Charter House to Eashing' SSSI (c.800m to the north; associated with the River Wey). There are no direct footpath links to either designated site; however, recreational impacts are a focus of consideration as part of the planning application currently underway in respect of the adjacent site (part of the same field) that falls within Waverley Borough (WA/2018/1239). In particular, there has been a focus on the need to avoid/mitigate recreational impacts to the SPA through delivery of SANG. The current planning application discusses the potential to enhance the wooded valley within the site boundary as a 'Valley Park SANG' measuring 3.2 ha in total, and including within it a 1.6km circular walk.²⁸ Furthermore, recent discussions with the land-owner (it is the same landowner across both sides of the site) have confirmed that a field will be made available to the west, located between Eashing Lane and the A3, for a 16.7 ha SANG, which would enable a much longer circular walk (i.e. a walk attractive to dog walkers). The outcome is that there appears to be a suitable SANG solution. Whilst there does inevitably remain an element of uncertainty regarding SANG delivery and effectiveness (e.g. the potential need to reduce the effective capacity of the SANG to account for noise disturbance from the A3 has been suggested), it is equally the case that effectiveness of the SANG solution would need to be approved, in consultation with Natural England, as part of any planning application process. The mitigation hierarchy is another consideration (i.e. the need to seek to avoid effects before relying upon mitigation), but equally SANG is generally accepted as an avoidance mechanism.

The outcome is that Clandon Golf does stand-out as the least constrained of the larger site options. It falls within the 5km TBHSPA buffer zone, within which SANG must be delivered to avoid/mitigate recreational impacts; however, it is relatively distant, and there is capacity at existing/planned SANGs to the south of Guildford (plus good access to high quality countryside more generally). Whilst the larger Clandon Golf site previously appraised was bounded (>50%) by SNCI woodland (falling within the North Downs Scarp and Dip BOA), the smaller site now under consideration does not border any SNCI (it would be buffered by the remaining golf course land).

²⁷ There is set to be capacity Russell Place Farm, which is a recently permitted 'strategic SANG' with capacity for around 1,800 homes. The SANG is located over 2km to the west; however, this is not considered problematic, noting that it is a *strategic* SANG. Under the established SANG approach, strategic SANG need only be within a 5km catchment of the development site in question. This is on the basis that strategic SANG will attract existing residents - who might otherwise use the SPA - as well as residents of the new scheme.

²⁸ See <http://planning360.waverley.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=7003436>

There are relatively few considerations in respect of the smaller village sites; however, there are a number of notable issues.

- The two Send Marsh sites (both allocated under Option 6) are in close proximity (<400m) to Papercourt Site of Special Scientific Interest (SSSI), which is an extensive complex of wetland habitats; however, it is noted that Papercourt Lake is home to a sailing club, and two of the other sites within the complex are managed as nature reserves by the Wildlife Trusts.
- Glaziers Lane, Flexford is within c.2km of the TBHSPA; however, there is sufficient SANG capacity at Russell Place Farm, to the west of Guildford. Also, the site has a stream at its eastern extent, which drains south to nearby Little Flexford SNCI, and falls within the Wanborough and Normandy Woods and Meadows BOA.
- Hornhatch Farm is adjacent to Wonnersh Common, which whilst not designated as an SNCI is designated common land, potentially indicating a degree of biodiversity value).

In **conclusion**, Option 4 (Clandon Golf + Small sites) performs best, including on the basis that it would lead to least concerns in respect of the SPA, and vice versa Option 2 (Liddington Hall + Aaron's Hill) performs worst. It is difficult to differentiate the other alternatives, and so they are judged to perform broadly on a par.

In respect of effect significance, taking the baseline situation as being one whereby submission allocations are found sound and adopted (i.e. focusing just on assessment of the proposal to allocate land for an additional 650 (550 + 100) homes), none of the scenarios would lead to significant effects. This reflects the relatively low quantum of homes involved, and the high likelihood that effective mitigation could be put in place, in particular through strategic and/or bespoke SANG.

Mitigate climate change through reducing emissions of greenhouse gases

	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	1	1	3	4	4	4	2
Significant effects?	No						

There is no potential to differentiate the alternatives in respect of CO₂ emissions from the built environment, as none of the sites in question are of sufficient scale to deliver new low carbon infrastructure (e.g. combined heat and power generation).

In respect of CO₂ emissions from transport, all of the smaller/village sites under consideration perform relatively poorly, given limited or no potential to access services / facilities by walking, cycling or public transport. The two Send Marsh sites perform particularly poorly, in this respect, as there is no train station nearby, access to a bus route is a c.800m walk to the south and services/facilities in Send (e.g. GP surgery) are over 1km distant. Flexford is also notable in that it is a small village without even a primary school; however, it does benefit from a train station (and nearby Normandy does have a primary school and a GP surgery).


The three larger urban extension sites perform notably better in comparison -

- Clandon Golf is approximately 3km from Guildford town centre, but Merrow Local Centre is approximately 1km away. The site is adjacent to the Merrow Park & Ride from where there are frequent bus services into Guildford town centre as well as advisory cycle lanes along the majority of Epsom Road between the town centre and the Park and Ride site, with opportunities for improvement.
- Liddington Hall is also approximately 3km to the town centre, but is slightly closer to a local centre (800m to Worplesdon Road in Stoughton). The site falls between two A roads (to Aldershot and Woking), both of which are associated with regular bus services; bus stops would likely be within a 400m easy walking distance for most new residents. The new proposed railway station at Guildford West will be 1.5km from the site and the Hospital, Research Park and University are also within 2km of the site.
- Aaron's Hill is within c.1km of Godalming train station and the town centre beyond, which provides a good range of shops, services and employment, albeit on a significantly smaller scale compared to Guildford town centre. Direct access will be via the Waverley Borough part of the site, and then along a public bridleway through a valley woodland, which is steep in parts and crosses the railway line. The proposal is to enhance public accessibility through the valley woodland - see discussion above, under 'Biodiversity' - and it is noted that the Preferred Options version of the Waverley Local Plan Part 2 (May 2018) proposes the following site-specific requirement: "Connections and improvements to the bridleway connecting Halfway Lane and New Way for pedestrians and cyclists, which preserve or enhance its historic character." There is a bus stop nearby with an hourly service (not Sundays), and a further two services per hour run along the Portsmouth Road (seven days a week), albeit the bus stops are at least 800m distant.

In **conclusion**, dispersal of development amongst smaller village sites is not supported, and, on balance, Aaron's Hill is considered to be the preferable site amongst the three larger site options. This conclusion determines the alternatives ranking.

With regard to effect significance, no significant effects are predicted. Climate change mitigation is a global issue, and hence it is not possible to conclude on the significance of local actions.

Create and sustain vibrant communities

	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	 1	2	2	3	3	3	3
Significant effects?	No						
Discussion	<p>None of the sites in question would deliver new or upgraded strategic community infrastructure, hence the primary question relates to the ability to access existing community infrastructure (with capacity). In this respect, the primary consideration relates to ability to access services and facilities without reliance on the private car, or without the need to drive too far, which is a focus of the discussion above, under 'Climate change'.</p> <p>There are three further considerations -</p> <ul style="list-style-type: none"> • Aaron's Hill is notable as the adjacent housing estate is the second-most 'deprived' SOA within Waverley Borough, as measured by the Index of Multiple Deprivation (IMD, 2015), and within Guildford Borough there are only four more deprived SOAs. Also, a primary school is located nearby, which was proposed to be closed, however the scale of development (across both Waverley and Guildford sites) is of a sufficient scale to generate the child yield necessary to enable the school to function successfully. It might also be the case that allocation of the site in conjunction with the adjacent site in Waverley Borough could support a more comprehensive scheme (e.g. perhaps a larger version of the new 'village green' that is included at the western edge of masterplan that has been submitted as part of the current Waverley planning application);²⁹ however, having said this, it currently seems most likely that the two adjacent sites will be progressed as separate planning applications. Finally, there is a need to note that allocation of the Guildford part of the site could be the trigger to enable the land-owner to make available another field to the west, to be delivered as a strategic SANG (see discussion above, under Biodiversity). • Higher growth at Send / Send Marsh (Option 6, in particular) might be considered problematic on the basis that this area is already set to receive a considerable amount of housing and employment growth (also Gypsy and Traveller pitches) via submission allocations (also, the latest proposal is to modify the submission strategy with 150 additional homes at Garlicks Arch and a doubling of the area of industrial floorspace at Burnt Common Warehouse). However, it is again difficult to assign any particular weight to this consideration. • In a similar vein, Liddington Hall is in close proximity to the submission allocation at Keens Lane (150 homes); also, and perhaps more notably, the site is associated with a high density of public footpaths, potentially serving to imply that the whole site is used for recreational purposes, e.g. dog walking (an important consideration, given proximity to the TBHSPA). <p>In conclusion, Aaron's Hill is seemingly associated with something of a community opportunity, given the potential for a Guildford Local Plan allocation to complement the adjacent Waverley Local Plan allocation; and there are potentially community issues in respect of Liddington Hall and the option of higher growth at Send. These considerations lead to the alternatives ranking.</p> <p>In respect of effect significance, significant effects are not predicted. In respect of Aaron's Hill, were the two adjacent sites to be progressed jointly as a 462 home scheme then there would be an anticipation of strategic community infrastructure upgrades, potentially leading to significant positive effects; however, the current intention is to progress two separate planning applications.</p>						

²⁹ <http://planning360.waverley.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=7003558>

Maintain Guildford borough and Guildford town’s competitive economic role

	Clandon Golf Aaron’s Hill	Lidd’ton Hall Aaron’s Hill	Aaron’s Hill Small sites	Clandon Golf Small sites	Lidd’ton Hall Small sites	Aaron’s Hill Small sites +	Clandon Golf Lidd’ton Hall
Rank	=						
Significant effects?	No						
Discussion	<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.</p> <p>Discussion under this heading within the Interim SA Report Update (2017) focused on the matter of housing quantum, with higher growth options supported. The matter of housing growth quanta necessary to support continued economic growth has been a focus of discussion during the examination hearings, and is discussed by the planning Inspector within examination document ID-06: “<i>On the subject of continuing employment growth, ID-005 contains a preliminary discussion of the various forecasts. The notable differences between the forecasts from OE, CE and Experian – 0.5% to 0.9% pa – suggest that taking a blended average of these forecasts as in the SHMA Addendum is not on its own a particularly robust approach. Data available from NOMIS indicates that there has been a 14,000 increase in jobs in Guildford over the past 16 years which represents a 0.96% CAGR. The SHMA Addendum growth assumption of 0.7% pa thus appears on the low side and I consider that a realistic and cautious approach would be to assume employment growth of 0.8% pa – lower than past trends and indeed lower than the highest of the economic forecasts, but higher than the blended average of the forecasts. This would appear to require housing provision in the order of 607 dpa.</i>”</p> <p>Employment growth projects are far from an exact science, hence it might be suggested that additional housing should be supported at the current time; however, the difference in total quantum between the additional housing scenarios is low (100 homes) in the context of a Local Plan providing for 12,600 homes in total.</p> <p>In conclusion, it is not possible to differentiate between the alternatives, and significant effects are not predicted.</p>						

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

	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	=						
Significant effects?	No						
Discussion	<p>The sustainability objective here is to <i>“Facilitate appropriate employment development opportunities to meet the changing needs of the economy”</i>, a broad objective that overlaps with the ‘Economy’ related objective (<i>“Maintain Guildford borough and Guildford town’s competitive economic role”</i>) that is a focus of separate discussion above.</p> <p>Discussion under this heading within the Interim SA Report Update (2017) focused on the matter of housing distribution, with spatial strategy options that would deliver new housing in closer proximity to centres of employment (in particular Guildford town centre).</p> <p>At the current time it is more challenging to draw strong conclusions, given the relatively modest number of ‘additional homes’ under consideration across the scenarios, and noting that none of the schemes under consideration would involve delivery of new employment floorspace. The matter of connectivity to higher order centres has already been discussed, under ‘Climate change’ and ‘Communities’.</p> <p>In conclusion, the alternatives are judged to perform broadly on a par under this heading, and significant effects are not predicted.</p>						

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

	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	=	=	=	=	=	=	=
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 fluvial, with by far the largest floodplain being that associated with the River Wey, which passes through the centre of Guildford Town, although there is also some risk of flooding from other sources (surface water, groundwater, sewers and artificial sources).</p> <p>There are three issues of note -</p> <ul style="list-style-type: none"> • Land at Polesdon Lane & Send Marsh Road, Send Marsh abuts an area of fluvial flood risk at its northern extent, albeit the extent of the flood risk zone is currently the subject of Environment Agency flood map challenge (i.e. the site promoters have submitted evidence to suggest that the flood risk zone is less extensive). The current promoted site purposely avoids the flood zone (as currently understood), with a larger site, encompassing the flood zone, having previously been promoted. • Glaziers Lane at Flexford is associated with a degree of surface water flood risk at its eastern extent. • Aaron's Hill 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. The Flood Risk Assessment submitted as part of the planning application for the adjacent site (which falls within Waverley Borough, and is closer to Godalming town centre than the Guildford site) concludes the following: <i>"Discharge options have been considered in line with the Building Regulations Part H requirements. Soakaway tests have indicated that infiltration rates are poor in some parts of the site to utilise infiltration in isolation to drain surface water. Therefore a staged discharge approach is used in line with the recommendation based on Greenfield rates. However, based on best practice guidance, it is recommended not to restrict the lowest discharge rate beyond the rate required to achieve self cleaning velocity. Sustainable Drainage System (SuDS) features proposed for the site include infiltration basins, permeable paving and soakaways. Based on the findings of this assessment, the flood risk associated with the proposed development is considered low."</i>³⁰ <p>In conclusion, it is not clear that any of the sites give rise to significant flood risk concerns, given the potential to avoid/mitigate effects at the planning application stage.</p>						

³⁰ <http://planning360.waverley.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=7003488>

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

	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
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"> 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 smaller sites, there is GP surgery at Send (accessible from the Send Marsh sites), Normandy (accessible from East of Glaziers Lane, Flexford) and Wonnersh (accessible from Hornhatch Farm, Chilworth). 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 and the Aaron’s Hill (Godalming) area; however, there is little potential to suggest implications for existing issues of health deprivation, either positive or negative. Active travel – It might be suggested that the larger sites on the edge main urban areas 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 (note that Liddington Hall is crossed by public rights of way, as discussed above). Air quality – The 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 sensitive receptors, specifically: A3, Ripley Bypass; Aldershot East; and the area around the A3/A31 junction at Onslow Village.”</i> There is little or no reason to suggest that the alternatives will have differential impacts on traffic at any of these locations. <p>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).</p>						

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

	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	2	2	2	2	2	3	★1
Significant effects?	No						
Discussion	<p>A primary consideration is the need to avoid impacts to listed buildings and their setting, noting that none of the sites under consideration are in proximity to a Conservation Area.</p> <p>Issues of note are -</p> <ul style="list-style-type: none"> • The two adjacent Send Marsh sites are located close to 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. • Clandon Golf is adjacent to Clandon Park, which is a Registered Park and Garden; however, the potential for significant impacts is seemingly low, given the intervening A25 dual carriageway and mature screening vegetation. There is also a cluster of listed buildings c.350m to the west (which includes the the Grade 2* listed Clandon Park Gatehouse); however, direct impacts are not thought likely, noting that that the field adjacent to the cluster (Merrow Cricket Club) is not included within the proposed development site. • Aarons Hill, Godalming, is potentially constrained by listed features to its west and northeast. Firstly, there is a cluster of listed buildings at Upper Eashing, a short distance to the west; however, there is a short stretch of Eashing Lane between the sites and the listed buildings, and there would not appear to be a risk of a direct visual connection. Secondly, there is a need to consider the potential for impacts to Westbrook House (<i>"a large Arts and Crafts house with very fine architectural detailing set within a carefully-designed early-twentieth century garden"</i>), and its associated Registered Park and Garden. This is a focus of the Built Heritage statement submitted alongside the recent planning application for the adjacent site within Waverley Borough, with the conclusion reached that the site: <i>"helps to provide the house and garden with a rural backdrop. Thus, this agricultural land, including the Site, is considered to provide a moderate but positive contribution to the significance of the listed house and the registered park and garden."</i> A larger cross-boundary site might increase concerns, noting that the Fox Way long distance path runs (from Godalming) past the house and the site; however, the Guildford part of the site is further from the house (485m at its closest point). <p>In conclusion, the above factors lead to the potential to differentiate the alternatives; however, it is recognised that this differentiation is marginal. There would be potential to avoid/mitigate impacts associated with all the development sites, through layout and design measures.</p>						

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

	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	3	3	2	3	3	★1	2
Significant effects?	Yes						
Discussion	<p>All of the additional housing scenarios would meet the objective of providing for 550 additional homes within the first five years post plan adoption, and hence would lead to significant positive effects. It is also the case that all have been selected for examination for the very reason that they are associated with a low risk of unforeseen delays to housing delivery.</p> <p>However, there is nonetheless some variation / potential to differentiate -</p> <ul style="list-style-type: none"> • Option 7 naturally performs well as a higher growth option, albeit only 100 additional homes would be delivered over-and-above the low growth options (Options 1 and 2). • Options 3 to 6 would involve a package of sites, geographically spread around the Borough, such that there would inherently be lower risk of unforeseen delays to housing deliver, relative to the scenarios involving reliance on just two sites. In a similar vein, it can be suggested that Option 7 performs relatively poorly as two additional urban extensions to Guildford would result in five in total (two of which are large-scale, strategic urban extensions), potentially resulting in 'more of the same', with implications for demand and in turn delivery. • Aaron's Hill would provide additional housing around Godalming, which is set to receive quite low housing growth - through the Waverley Local Plan - for a settlement of its size, on the basis that it is heavily constrained, including by steep hillsides and the River Way floodplain. This site therefore performs well in respect of ensuring a good geographic spread of homes. <p>In conclusion, options involving Aaron's Hill and small sites (Options 3 and 6) perform well as there would be a good geographical spread of sites, whilst Option 7 performs well as a higher growth option, albeit there is a concern in respect of geographic spread.</p>						

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

	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	2	2	2	2	2	2	★1
Significant effects?	Yes						No
Discussion	<p>The 'Agricultural Land Classification Provisional (England)' dataset, available at 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, 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 magic.gov.uk, which is suitable for differentiating site options at the borough-scale, and does distinguish between grade 3 / 3a. 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.</p> <p>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 –</p> <ul style="list-style-type: none"> • Alderton's Farm (Options 2, 5, 6 and 8) = Grade 2 or 3a • Liddington Hall - Grade 3b • Clandon Golf - Grade 3b <p>With regards to Aaron's Hill, a study was recently submitted as part of the current planning application that has been submitted for the Waverley Borough part of this cross-boundary site; however, the study concludes only that: "As set out on the <i>Natural England mapping below the site (marked with a star) is considered Grade 3 (good to moderate)</i>".³¹</p> <p>In conclusion, it is appropriate to conclude that Option 7 performs best, as it would seemingly avoid loss of best and most versatile agricultural land, albeit the total quantum of agricultural (or potential agricultural land, noting that Clandon Golf is a golf course) would be highest; however, it is not possible to differentiate the other alternatives.</p> <p>In respect of effect significance, significant negative effects are predicted for Options 1 to 6 on the basis that there would likely be loss of best and most versatile agricultural land, although it is recognised that the quantity of land lost would be relatively low.</p>						

³¹ <http://planning360.waverley.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=7003482>

Conserve and enhance landscape character

	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	2	1 	2	3	2	2	2
Significant effects?	No						

Landscape capacity/sensitivity was a key factor taken into account when establishing the additional housing scenarios, 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).³² Also, there is land adjacent to the AONB that is currently designated as an Area of Great Landscape Value (AGLV), an important designation, including because of the ongoing AONB boundary review. 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, this is undertaken at a broad scale, with no discussion of sites.

Notable issues, taking the sites in rough order of preference (worst to best), are as follows -

- Aaron's Hill (Godalming) falls within the AGLV and comprises red-rated Green Belt. The site is a large, open arable field, with extensive views across the site from Eashing Lane and the Foxes Way long distance path (bridleway), including longer distance views to the north, across the Wey Valley. However, views are already set to be impacted by the committed Waverley part of this cross-border site, and, with this being the case, the development may have some beneficial effects, in landscape terms. In particular, allocation might be considered a 'positive' in certain Green Belt terms, as it will ensure a robust, defensible Green Belt boundary, in the form of Halfway Lane. It is noted that the Landscape and Visual Impact Assessment (LVIA) recently submitted alongside the planning application for the Waverley part of the site concludes that the long term landscape effect of development would be beneficial, as *"Halfway Lane...could be used as a clear urban edge, and with appropriate landscape treatment would be softer than the current hard and intrusive urban edge."*³³
- Clandon Golf comprises red-rated Green Belt and AGLV; however, the LCA does not reference this golf course as a particular asset within the Merrow and Clandon Wooded Chalk Downs character area (whilst nearby Guildford Golf Course is referenced).
- Hornhatch Farm (Chilworth) is 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.
- Liddington Hall - comprises red-rated Green Belt, rising land and is crossed by footpaths; however, the site is seemingly well contained, with built form along most of the boundary.

³² Green Belt is not technically a landscape designation. However, given 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 helpful to take account of Green Belt sensitivity.

³³ <http://planning360.waverley.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=7002232>

- The two Send Marsh sites are potentially least sensitive. Send Marsh falls within the Ockham and Clandon Woodland Rolling Countryside character area, which is an extensive area identified as having 'moderate' condition and strength of character. The LCA states: "*This looser, later form of disparate development dilutes the more typical local character of the area, as within Send and Send Marsh.*" It is difficult to differentiate the two sites. Alderton's Farm is a larger site, and perhaps slightly less well contained by built development, but is identified as less sensitive (amber) Green Belt. It is also noted that a footpath runs along the one edge of 'Land at Polesdon Lane & Send Marsh Road' that is open to the surrounding countryside.




In **conclusion**, It is a challenge to differentiate the alternatives, but on balance the ranking reflects an understanding that Liddington Hall is relatively unconstrained, whilst Aaron's Hill will complete a cross-boundary development, and in turn enable a robust, defensible Green Belt boundary..

With regards to effect significance, significant negative effects are not predicted under any option, noting no potential for the scenarios (i.e. 650 homes) to impact on the AONB, and significant impacts to the AGLV unlikely.

Reduce poverty and social exclusion for all sectors of the community

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	=						
Significant effects?	No						
Discussion	<p>The sustainability objective here is to “Reduce poverty and social exclusion for all sectors of the community”, 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’.</p> <p>This conclusion is reached recognising that, 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, it is not clear that any of the sites under consideration here would support regeneration initiatives. The Aaron’s Hill output area in neighbouring Waverley Borough is also relevant (Options 1, 2, 3 and 5); however, the output area is not within the bottom 20% of output areas nationally.</p>						

Make the best use of previously developed land and existing buildings

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	2	2	2				2
Significant effects?	No						
Discussion	<p>Land at Polesdon Lane & Send Marsh Road, Send Marsh (Options 4, 5 and 6), is associated with some past uses that serve to indicate an element of previously developed land; however, the extent of previously developed land has not been confirmed, and this is a small site.</p>						

Enhance the borough's rural economy

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	=						
Significant effects?	No						
Discussion	<p>The village extension sites might potentially contribute to the rural economy to some extent, with Flexford being notably the smallest and most rural of the villages under consideration; however, it is difficult to identify any particular opportunities. There are no existing facilities in Flexford, and so it is not possible to argue that development would help to secure the long term future of village facilities, and hence contribute to village vitality in this way. There is a GP and primary school in nearby Normandy, but there is nothing to indicate that these facilities are under pressure due to low demand. There has been nothing to indicate that the site might deliver any employment space (e.g. small-scale flexible office space), but this is perhaps an opportunity that could be explored through the planning application process.</p> <p>In conclusion, it is not possible to differentiate the alternatives with any certainty, and significant effects are not predicted.</p>						

Create and maintain safer and more secure communities

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	=						
Significant effects?	No						
Discussion	<p>Of the site options that are a focus of this current appraisal, i.e. those that are a variable across the scenarios, 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.</p> <p>Another issue locally is pedestrian, cyclist and road traffic; however, none of the sites in question are thought to be associated with any particular issues, in this respect.</p>						

Minimise journey lengths and encourage use of sustainable forms of **transport** (walking, cycling, bus, rail)

	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	★ 1	★ 1	2	2	2	3	★ 1
Significant effects?	No						

Relevant issues/impacts have already been discussed under the 'Climate change'. There is nothing further to add under this heading, and so the alternatives are ranked as per the conclusion reached under 'Climate change'.

Traffic congestion

One further issue, which can be helpfully discussed here, is the matter of traffic congestion. Whilst there is limited evidence available to differentiate the alternatives (in the absence of detailed modelling evidence), and impacts are likely to be low (given the relatively low quanta of homes involved), there is a need to discuss the key matter of traffic congestion on (and approaching) the A3, and the timing of strategic upgrades to the A3 and also M25 J10.

The key point to note is that upgrades to M25 J10 will come forward ahead of upgrades to the A3, which potentially serves to indicate that further growth to the east of the urban area is preferable to growth to the west. However, the situation is complex, with another factor being the timing of new A3 slip-roads to the east of Guildford, at Burnt Common and Gosden Hill Farm.

Discussion Focusing on the larger sites, considerations include -

- Vehicle trips to/from Clandon Golf to/from the south (Portsmouth direction) will pass through part of the Guildford section of the A3 which is due to be improved by the RIS1 Road Period 2 scheme. Those travelling to/from the north towards London and the M25 motorway will not generally be expected to use this section of the A3.
- Vehicle trips to/from Liddington Hall to/from the south (Portsmouth direction) will pass through part of the Guildford section of the A3 which is due to be improved by the RIS1 Road Period 2 scheme. Those travelling to/from the north towards London and the M25 motorway would generally be expected to use the Stoke Interchange junction to access the A3 and which is the eastern most junction proposed for improvement by the RIS1 Road Period 2 scheme.
- Vehicle trips to/from Aarons Hill to/from the south (Portsmouth direction) will not pass through the Guildford section of the A3. Those travelling to/from the north towards London and the M25 motorway will use the Guildford section of the A3; however, they will be on the mainline carriageway through the A3 Guildford section and would not be leaving or joining the A3 Guildford at its junctions.

Reduce waste generation and achieve the sustainable management of waste

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	N/a						
Significant effects?							
Discussion	This objective is not applicable 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

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	=						
Significant effects?	No						
Discussion	<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. There is a water deficit, with Thames Water's Water Management Plan (Thames Water's Our Long Term Strategy 2015-2040) forecasting an increase from a deficit of 125 megalitres per day to a deficit of 367 meglitres per day.</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, let alone that growth at one location should be favoured over growth at another. This is on the basis that water resource management is a 'larger than local' issue.</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>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 significant additional wastewater; however, the study concludes that it should be possible to increase the capacity of the WwTW.</p> <p>In conclusion, there is no potential to differentiate the alternatives, and significant effects are not predicted.</p>						

Summary and conclusions

Topic	Rank of performance / categorisation of effects						
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd ton Hall
Biodiversity	2	3	2	★1	2	2	2
Climate change	★1	★1	3	4	4	4	2
Communities	★1	2	2	3	3	3	3
Economy	=						
Employment	=						
Flooding	=						
Health	=						
Historic environment	2	2	2	2	2	3	★1
Housing	3	3	2	3	3	★1	2
Land	2	2	2	2	2	2	★1
Landscape	2	★1	2	3	2	2	2
Poverty	=						
Brownfield	2	2	2	★1	★1	★1	2
Rural	=						
Safety	=						
Transport	★1	★1	3	4	4	4	2
Water	=						

Topic	Rank of performance / categorisation of effects						
	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd ton Hall

Conclusion

The first key point to note is that there is little or no potential to confidently differentiate the relative merits of the alternative scenarios in respect of a number of objectives, and that ‘significant effects’ are predicted for two topics only. This reflects the fact that the quanta of homes that would be delivered under each is relatively low (650 homes in total, comprising 550 in the first five years post adoption, plus an additional 100 in the middle part of the plan period). N.B. it is important to emphasise that the submission allocations are not being appraised here, i.e. they form an element of the baseline, for the purposes of this appraisal.

The second key point to note is the identical order of preference under two topic headings: ‘Climate change’, and ‘Transport’. The same broad issue is the focus of discussion under all of these headings, namely ability to access key destinations - i.e. services/facilities and employment - via walking, cycling and public transport (or via short car journeys). This is a key issue, which enables differentiation between the scenarios. The broad conclusion is that the extensions to larger settlements are favoured over the village extensions, and that Aaron’s Hill is the preferable larger site, reflecting its proximity to Godalming town centre and station.

Thirdly, there is a need to make a contextual point, namely that the appraisal does generally find that the sites comprising the scenarios tend to impact on their local area in isolation, with limited in-combination impacts (with the discussion under ‘housing’ being the notable exception). It follows that ranking of the alternatives does largely equate to a process of ‘tallying’ the performance of individual component sites.

Having made these initial points, the following bullet points consider other notable topic headings in turn -

- Biodiversity - Liddington Hall (in particular) and Aaron’s Hill are in proximity to a Special Protection Area (SPA), meaning that there would be a need to avoid/mitigate the impact of increased recreational pressure through delivery of Suitable Alternative Natural Greenspace (SANG). Certain of the smaller village sites are also constrained by proximity to nationally or locally designated sites.
- Communities - the Aaron’s Hill site is potentially associated with a degree of opportunity, noting that the site forms part of a larger cross-boundary site that together will deliver nearly 500 homes, albeit it is noted that a planning application has already been submitted for the Waverley Borough part of the site. The site is adjacent to an area that suffers from a degree of relative deprivation, and the potential to support the local primary school has been identified. SANG proposals associated with the scheme are also of note.
- Historic environment - the part of the Aaron’s Hill cross-boundary site that falls within Waverley Borough has been found to be constrained by proximity to Grade II* listed Westbrook House and Registered Park/Garden; however, it seems likely that the Guildford Borough part of the site is less constrained in this respect. The two Send Marsh sites are also notable for being in proximity to a cluster of listed buildings.
- Housing - all of the alternatives would meet the objective of providing for 550 additional homes within the first five years post plan adoption, and hence would lead to significant positive effects. It is also the case that all have been selected, for appraisal, for the very reason that they are associated with a low risk of unforeseen delays to housing delivery. However, there is some variation / potential to differentiate, with Option 6 favoured as a higher growth option that would deliver the best geographical spread of sites.
- Landscape - all sites are subject to constraint, e.g. due to AGLV (Aaron’s Hill, Clandon Golf and Hornhatch Farm), Green Belt sensitivity (all sites other than Alderton’s Farm comprise ‘red-rated’ Green Belt) and/or sensitive views from roads / public rights of way (notably Aaron’s Hill and Land at Polesdon Lane; also potentially Liddington Hall). It is a challenge to differentiate the alternatives, but on balance the ranking reflects an understanding that Liddington Hall is relatively unconstrained, whilst Aaron’s Hill will complete a cross-boundary development, and in turn enable a robust, defensible Green Belt boundary.
- Brownfield - the ranking reflects the fact that Land at Polesden Lane, Send Marsh, includes an element of brownfield (i.e. previously developed) land.

In **conclusion**, all alternatives are associated with certain ‘pros and cons’. The intention is for the Council, and stakeholders (through the consultation on proposed modifications) to take this understanding into account when considering how best to ‘trade-off’ between / balance the competing objectives.