

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

## **SA Report Addendum Non-technical Summary**

September 2018

## DOCUMENT DETAILS

1	Sept 2017	Non-technical summary of the SA Report Addendum published alongside proposed modifications to the Guildford Local Plan	Mark Fessey Associate	Steve Smith Technical Director	Steve Smith Technical Director
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AECOM Infrastructure & Environment UK Limited  
 2 Leman Street, London E1 8FA  
 Telephone: +44 (0)20 7798 5000

## Introduction

AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Guildford Local Plan. Once adopted, the plan will allocate land for development and set policies to guide decisions on development and changes in how land is used.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA for Local Plans is a legal requirement, in-line with the EU Strategic Environmental Assessment (SEA) Directive.

The Guildford Local Plan is at an advanced stage of preparation, with Proposed Modifications (to the plan as submitted to Government for examination in 2017) currently published for consultation.

An SA Report Addendum is published alongside Proposed Modifications, with the aim of informing the consultation, and subsequent plan finalisation (see the discussion of 'next steps', below).

This is a Non-technical Summary (NTS) of the SA Report Addendum.

### Structure of the SA Report Addendum / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
2. What are the appraisal findings at this current stage?
3. What are the next steps?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question 'What's the scope of the SA?'

### What's the scope of the SA?

The scope of the SA is essentially reflected in a list of sustainability objectives and issues. Taken together, this list indicates the parameters of the SA, and provides a methodological 'framework' for appraisal.

*Sustainability objectives and issues (the SA framework)*

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

<sup>1</sup> The Council has a duty to give "due regard" to promoting equality of opportunity for all protected groups when making decisions; and publish information showing how they are complying with this duty. 'Protected groups' are those with the following characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

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

# PLAN-MAKING / SA UP TO THIS POINT

An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft proposals (i.e. Proposed Modifications, in this case), and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the SA Report Addendum explains how work was undertaken to develop and appraise reasonable alternatives, ahead of preparing Proposed Modifications.

Specifically, Part 1 of the report -

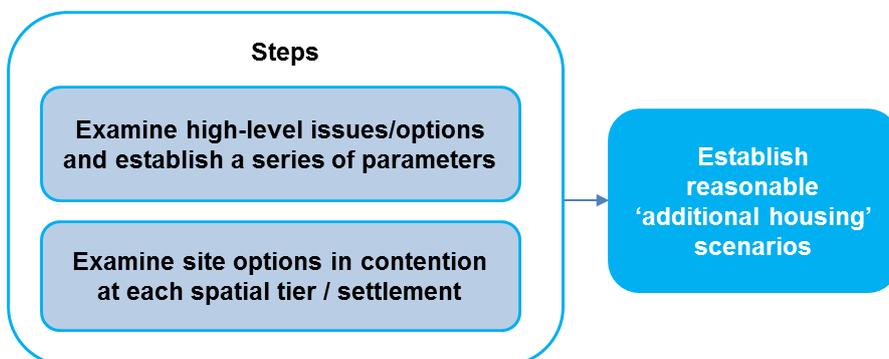
- 1) explains the reasons for **selecting the alternatives dealt with**
- 2) presents an **appraisal** of the reasonable alternatives
- 3) explains reasons for **selecting the preferred option**

## Selecting the reasonable alternatives

The decision was taken to focus on reasonable alternative approaches to the allocation of additional land to deliver c.550 homes in the first five years following plan adoption, henceforth referred to as ‘additional housing scenarios’. This is on the basis that allocation of land for additional housing is the central matter to be addressed through proposed modifications.

The main report explains how reasonable alternatives were established subsequent to a detailed process of considering strategic parameters/priorities and the merits of individual site options in contention for allocation. The process can be summarised in a flow diagram (see below). The reasonable alternatives ultimately arrived at are presented in the table below, and the subsequent maps.

### *Establishing the reasonable alternatives*



*The (reasonable) additional housing scenarios*

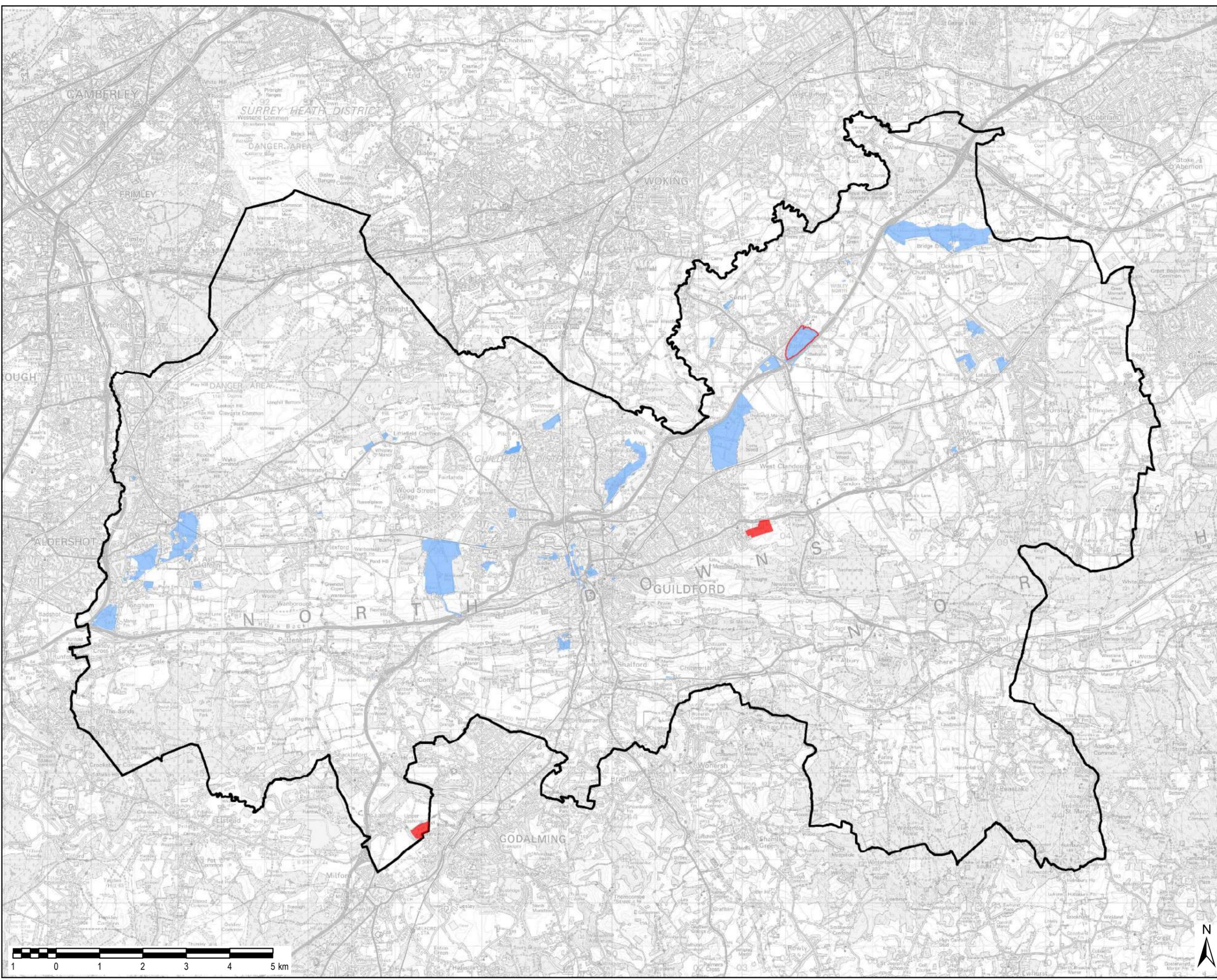
	Option 1 Clandon Golf Aaron's Hill	Option 2 Lidd'ton Hall Aaron's Hill	Option 3 Aaron's Hill Small sites	Option 4 Clandon Golf Small sites	Option 5 Lidd'ton Hall Small sites	Option 6 Aaron's Hill Small sites +	Option 7 Clandon Golf Lidd'ton Hall
<b>Constant</b>							
							50
<b>Variables</b>							
							300
	Liddington Hall, Guildford	300			300		300
	Aaron's Hill, Farncombe	200	200	200		200	
<b>Tier 10</b>	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	
<b>Total additional homes (yrs 1 to 5)*</b>	<b>550</b>	<b>550</b>	<b>555</b>	<b>585</b>	<b>585</b>	<b>605</b>	<b>650</b>
<b>% over 550 home target</b>			<b>1%</b>	<b>6%</b>	<b>6%</b>	<b>10%</b>	<b>18%</b>

\* 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**

Drawn SM	Checked MF	Approved MF	Date 06/09/2018
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AECOM  
 Midpoint  
 Alençon Link, Basingstoke  
 Hampshire, RG21 7PP  
 Telephone (01256) 310200  
 Fax (01256) 310201  
 www.aecom.com

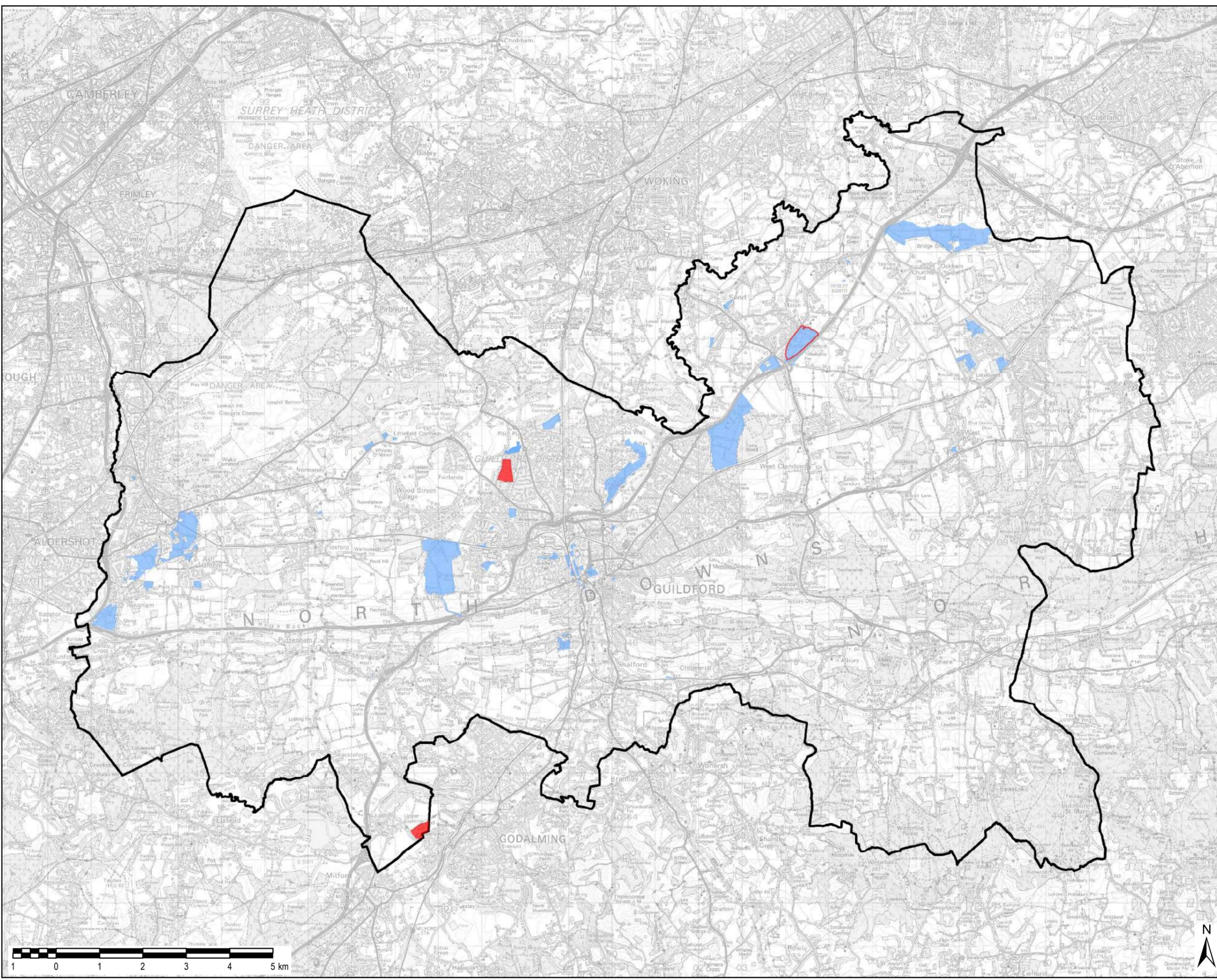


File Name: Z:\Projects\Guildford SA 60537035\02\_Maps\Figure 2 - Option 1 Clandon Golf Aaron's Hill .mxd

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

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 Fax (01256) 310201  
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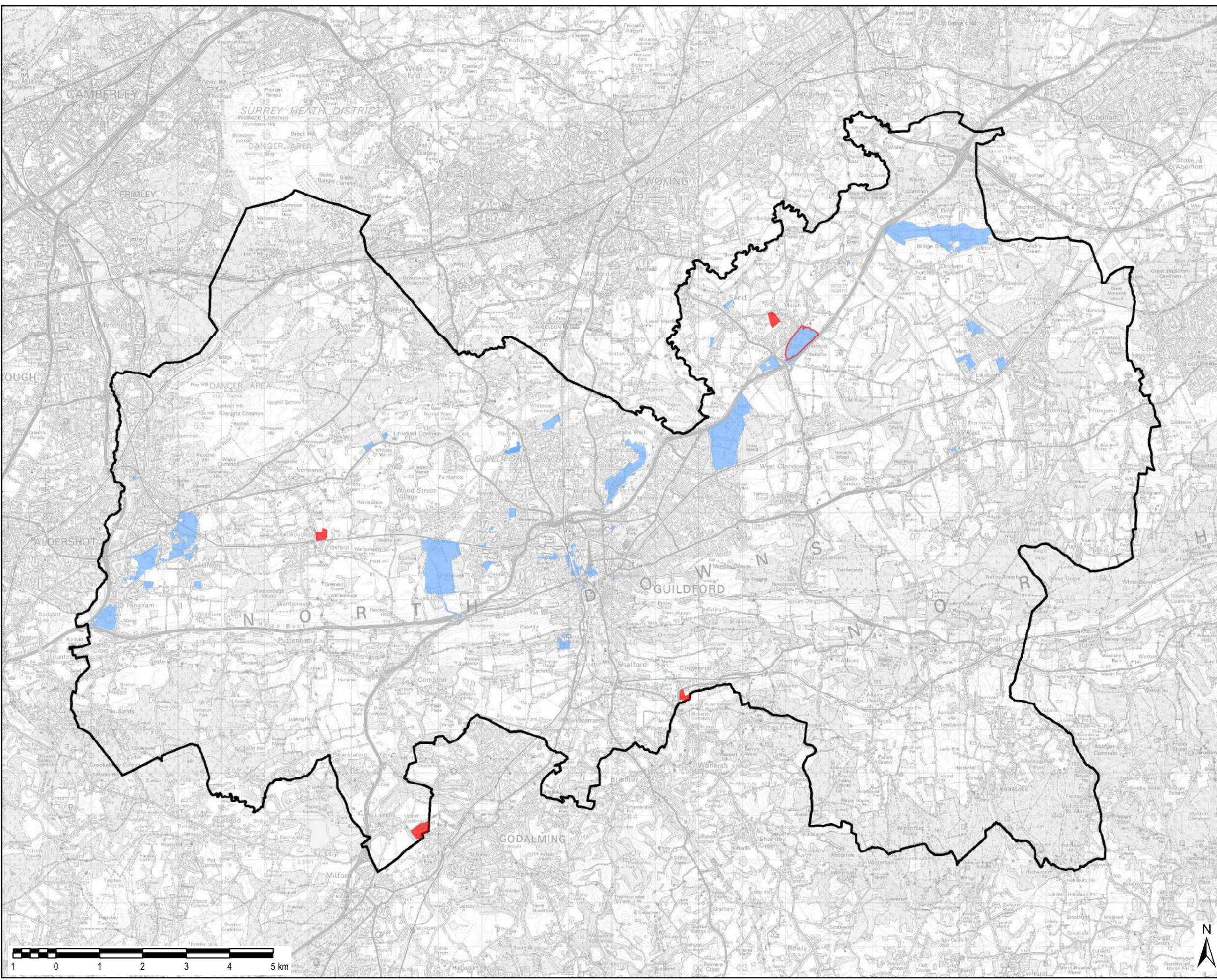


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Drawing Title **OPTION 3: AARON'S HILL SMALL SITES**

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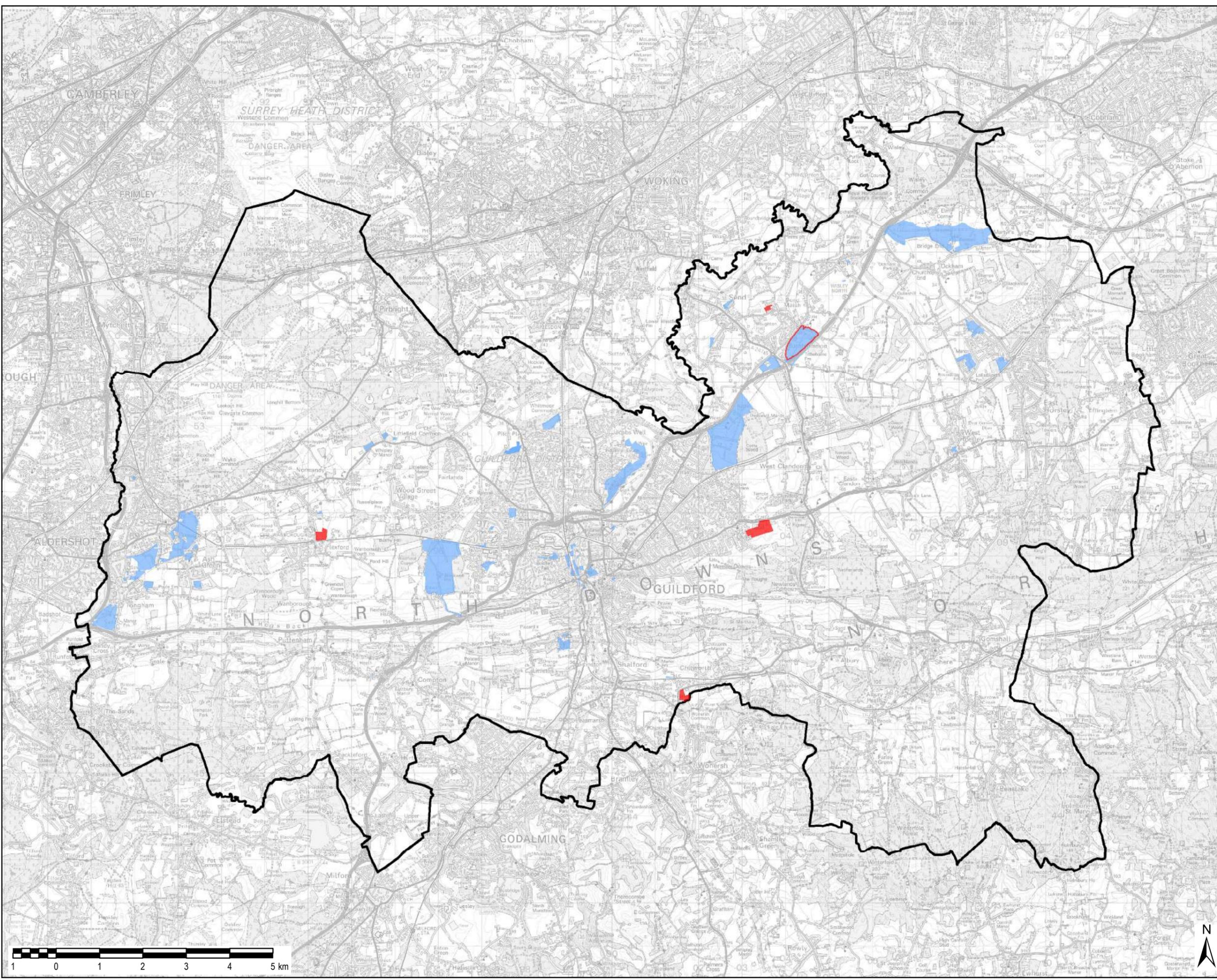


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-  Submission allocations (2017; N.B. not all housing)



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Project Title **GUILDFORD LOCAL PLAN SA**

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

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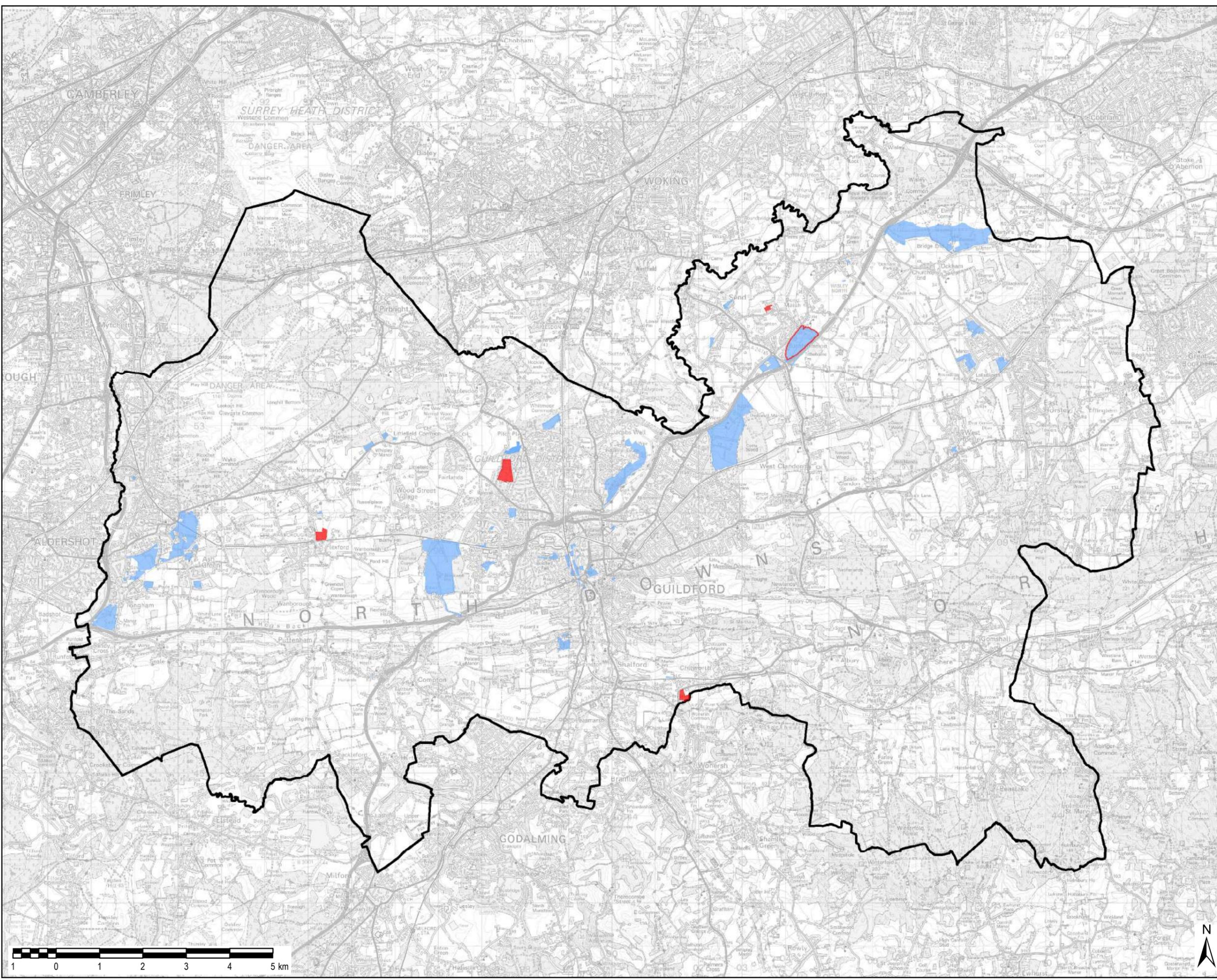


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- Additional Housing Sites
- Submission Allocations



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Project Title **GUILDFORD LOCAL PLAN SA**

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

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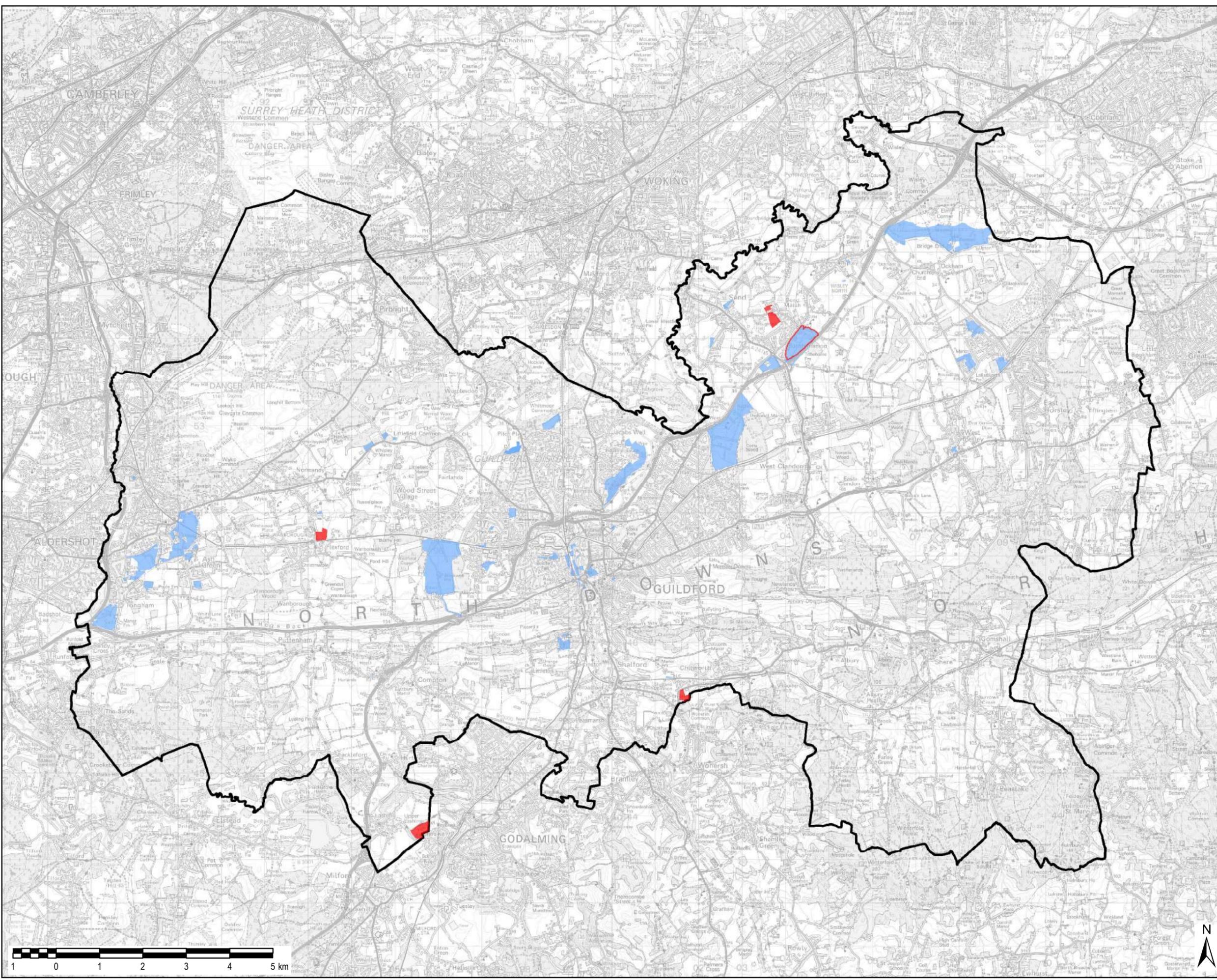


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Drawing Title **OPTION 6:  
 AARON'S HILL  
 SMALL SITES +**

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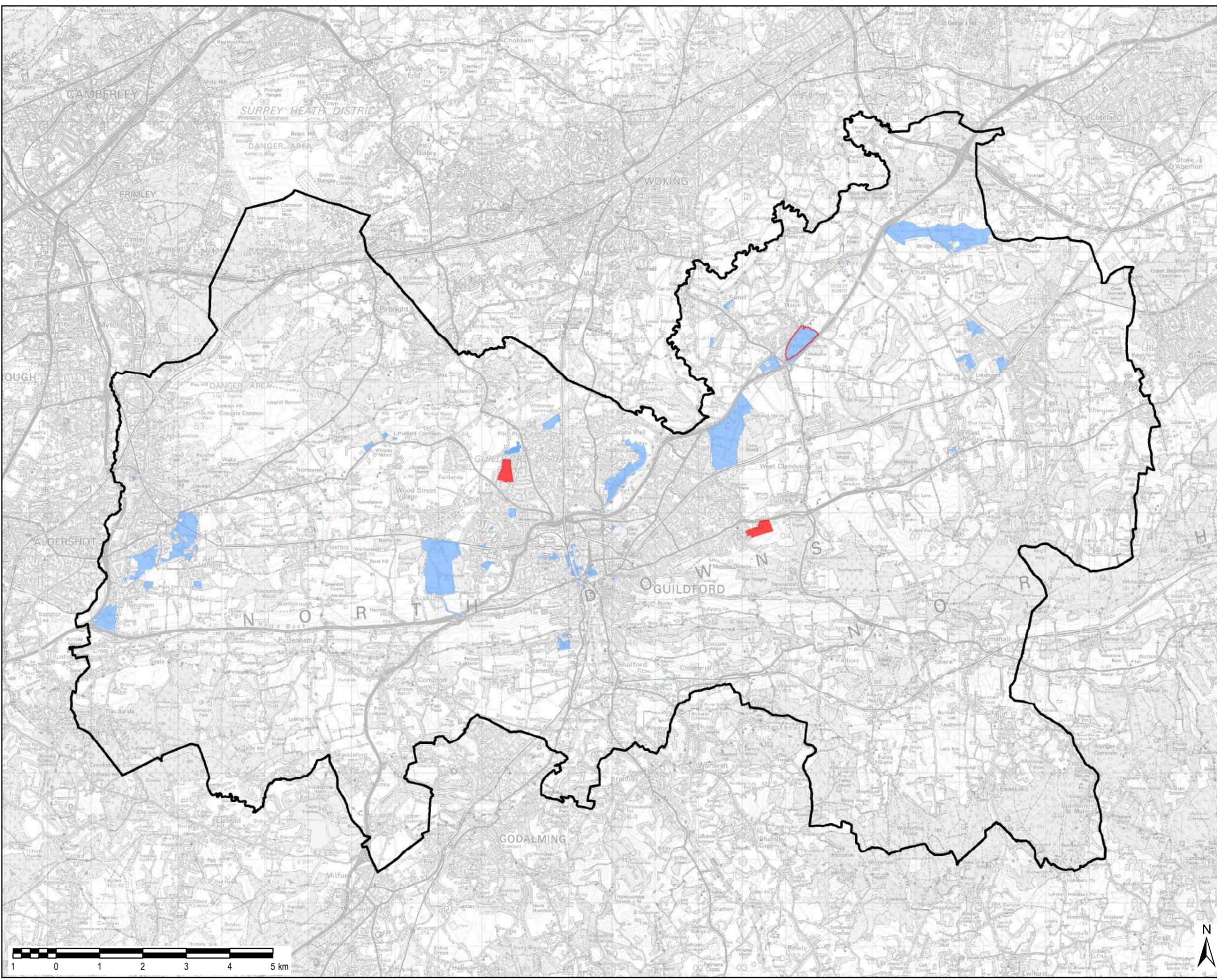


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Drawing Title **OPTION 7:  
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**Appraising the reasonable alternatives**

Summary appraisal findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects' (using **red / green**) and also rank in order of performance.

*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.

## Selecting the preferred option

The following text is the Council's response to the alternatives appraisal, i.e. reasons for supporting the preferred option in-light of the alternatives appraisal.

*"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."*

# APPRAISAL FINDINGS AT THIS STAGE

Part 2 of the SA Report Addendum answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the Proposed Modifications. The overall appraisal conclusion is presented below.

## Appraisal of the Proposed Modifications

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.
- 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** conflicts with health objectives.
- 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.

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.

Consultees and the Inspector may also wish to note the three specific recommendations that are referenced within the appraisal, 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).

## Next steps

Part 3 of the main report answers the question “*What happens next?*” by discussing plan finalisation and monitoring.

### Plan finalisation

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.

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’.

### Monitoring

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

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).

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.

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.*”