

Sustainability Appraisal (SA) of the Guildford Borough Local Plan

SA Report

Non-technical summary

June 2016

Revision schedule

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	June 2016	Non-technical summary of the SA Report published alongside the 'Proposed Submission' version of the Guildford Borough Local Plan	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Guildford Borough Local Plan. Once adopted, the plan will establish a spatial strategy for growth and change over the next 15 years, allocate sites and establish the policies against which planning applications will be determined.

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, under the Planning and Compulsory Purchase Act (2004). It is also a requirement that SA is undertaken in-line with the procedures prescribed by the EU Strategic Environmental Assessment (SEA) Directive (2001),¹ and as such SA can be said to incorporate SEA.

At the current time, the 'Proposed Submission' version of the Local Plan is published in-line with Regulation 19 of the Local Planning Regulations, and the 'SA Report' is published alongside. The SA Report aims to inform representations, and subsequent plan-making work (see the discussion of 'next steps', below).

This is a non-technical summary (NTS) of the SA Report.

Structure of the SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
 - i.e. in the run-up to preparing the draft plan.
2. What are the appraisal findings at this current stage?
 - i.e. in relation to the Draft Plan.
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, which were developed subsequent to a 'scoping' process that involved review of the sustainability context and baseline, identification/refinement of issues and also consultation with organisations specified by Regulations.

Taken together, the list of sustainability objectives indicate the parameters of SA, and provide a methodological 'framework' for appraisal - see Table 1.

¹ As transposed by the Environmental Assessment of Plans and Programmes Regulations 2004

Table 1: Sustainability objectives (the SA framework)

Sustainability objectives
1. Conserve and enhance biodiversity and the natural environment
2. Mitigate climate change through reducing emissions of greenhouse gases
3. Create and sustain vibrant communities
4. Maintain Guildford borough and Guildford town’s competitive economic role
5. Facilitate appropriate employment development opportunities to meet the changing needs of the economy
6. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment
7. Facilitate improved health and well-being of the population, including enabling people to stay independent and reducing inequalities in health
8. Protect, enhance, and where appropriate make accessible, the archaeological and historic environments and cultural assets of Guildford, for the benefit of residents and visitors
9. Provide sufficient housing of a suitable mix taking into account local housing need, affordability, deliverability, the needs of the economy, and travel patterns
10. Minimise the use of best and most versatile (BMV) agricultural land and encourage the remediation of contaminated land
11. Conserve and enhance landscape character
12. Reduce poverty and social exclusion for all sectors of the community
13. Make the best use of previously developed land and existing buildings
14. Enhance the borough’s rural economy
15. Create and maintain safer and more secure communities
16. Achieve a pattern of development which minimises journey lengths and encourages the use of sustainable forms of transport (walking, cycling, bus and rail)
17. Reduce waste generation and achieve the sustainable management of waste
18. Maintain and improve the water quality of the borough’s rivers and groundwater, and to achieve sustainable water resources management

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 plan, and then presenting information on reasonable alternatives within the report published alongside the draft plan.

As such, Part 1 of the SA Report explains how work was undertaken to develop and appraise alternative approaches to housing growth (**alternative spatial strategies**). Specifically, Part 1 of the report -

- 1) Explains the process of establishing reasonable alternatives;
- 2) Presents the appraisal of the reasonable alternatives; and
- 3) Gives the Council's response to the alternatives appraisal findings.

Establishing reasonable alternatives

When developing reasonable alternatives in early 2016 there was firstly a need to take account of considerable background, including lessons learned from past SA work and the consultations held in 2013 ('Issues and Options') and 2014 ('Draft Plan').

Having established certain parameters, the task was then to follow a step-wise process that would lead to the development of a single set of alternative spatial strategies for appraisal (and ultimately consultation):

- 1) Consider quantum options - which involved identifying the Objectively Assessed Needs (OAN) for housing and giving initial consideration to the question of whether there is simply a need to provide for OAN, or whether it might also be 'reasonable' to consider options that would involve a quantum of housing above or below OAN.
- 2) Consider distribution options - which involved giving examining the hierarchy of places / potential growth locations that exists within Guildford Borough, with Guildford Town Centre at the top of the hierarchy as a location generally suited to growth, and Green Belt land around villages at the bottom of the hierarchy. Specifically, the task was to consider each of the places / potential growth locations in the hierarchy in turn, examining whether the approach to growth at each should be taken as a 'given' or a 'variable' for the purpose of developing spatial strategy alternatives.
- 3) Establish reasonable alternatives (varying in terms of quantum and distribution) - see Table 2.

Points to note are as follows -

- The hierarchy of places is evident in Table 2, with the urban areas and built up areas of villages high up within the table, followed by previously developed land (PDL) in the Green Belt, the Countryside Beyond the Green Belt (CBGB), Wisley Airfield (a special case), the five possible locations for an urban extension (UE) to Guildford and then finally rural Green Belt sites (with Normandy/Flexford being a special case, as there is potential for major expansion).
- When examining Green Belt sites, a primary consideration is the sensitivity of the Green Belt parcels in question, as established by the Green Belt and Countryside Study of 2014 (see 'Volume 2 Addendum'). Specifically, the study resulted in a district-wide map categorising each Green Belt parcel on a red/amber/green scale (red = high sensitivity).²
- Finally, it is worth noting that the alternatives introduced in Table 2 are also mapped within the main SA Report.

² See www.guildford.gov.uk/media/16835/Appendix-2-Green-Belt-Sensitivity-Map/pdf/Appendix_2_Green_Belt_Sensitivity_Map.pdf

Table 2: Spatial strategy alternatives (N.B. greyed-out rows show the constants)

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8
Name	OAN	OAN plus 3% buffer	OAN plus 12% buffer	OAN plus 14% buffer	OAN plus 18% buffer	OAN plus 27% buffer	OAN plus 30% buffer	OAN plus 34% buffer
Completions	1378	1378	1378	1378	1378	1378	1378	1378
Commitments	758	758	758	758	758	758	758	758
Windfall	625	625	625	625	625	625	625	625
Rural Exceptions Sites	90	90	90	90	90	90	90	90
Guildford Town Centre	1172	1172	1172	1172	1172	1172	1172	1172
Guildford Urban Area	1570	1570	1570	1570	1570	1570	1570	1570
Ash and Tongham Urban Area	91	91	91	91	91	91	91	91
Within village built up area	195	195	195	195	195	195	195	195
Within village boundaries, but outside BUE	236	236	236	236	236	236	236	236
PDL in the Green Belt	299	299	299	299	299	299	299	299
CBGB - Ash and Tongham extensions	1235	1235	1835	1235	1235	1835	1835	1835
CBGB - Ash Green extensions	120	120	120	120	120	120	120	120
Wisley	0	0	0	2100	2100	2100	2100	2100
Guildford UE - Blackwell	1800	1800	1800	1800	1800	1800	1800	1800
Guildford UE - Gosden Hill Farm	2000	2000	2000	2000	2000	2000	2000	2000
Guildford UE - Keens Lane	140	140	140	140	140	140	140	140
Guildford UE - Clandon Golf	0	0	0	0	0	0	1000	1000
Guildford UE - Liddington Hall	0	0	600	0	0	600	0	600
Normandy/Flexford	1100	1100	1100	1100	1100	1100	1100	1100
Send Marsh (amber rated site; mixed use)	400	400	400	400	400	400	400	400
Horsleys (green rated sites x4)	445	445	445	445	445	445	445	445
Flexford (green rated site)	50	50	50	50	50	50	50	50
Send (green rated site)	40	40	40	40	40	40	40	40
Send Marsh (amber rated sites x3)	100	550	550	0	550	550	550	550
Total	13844	14294	15494	15844	16394	17594	17994	18594
Variation on OAN (%)	0	3	12	14	18	27	30	34

Summary alternatives appraisal findings

Within each row (i.e. for each element of the SA framework - see Table 1) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects' (using red / amber / green) and also rank the alternatives in order of performance. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

Table 3: Spatial strategy alternatives appraisal findings

Topic	Rank of performance / categorisation of effects							
	Option 1 OAN	Option 2 OAN + 3%	Option 3 OAN + 12%	Option 4 OAN + 14%	Option 5 OAN + 18%	Option 6 OAN + 27%	Option 7 OAN + 30%	Option 8 OAN + 34%
Biodiversity	★1	2	3	4	5	6	6	8
Climate change	8	7	6	5	4	3	2	★1
Communities	3	8	3	★1	3	3	★1	3
Economy	8	7	6	5	4	3	2	★1
Employment	6	7	8	2	4	4	★1	3
Flooding	=	=	=	=	=	=	=	=
Health	=	=	=	=	=	=	=	=
Historic environment	★1	2	3	3	5	6	7	8
Housing	8	7	6	5	4	3	2	★1
Land	★1	2	3	3	5	6	7	8
Landscape	★1	2	4	3	5	6	7	8
Poverty and social exclusion	=	=	=	=	=	=	=	=
Previously developed land	=	=	=	=	=	=	=	=
Rural economy	=	=	=	=	=	=	=	=
Transport	★1	★1	3	4	5	7	6	8
Water	=	=	=	=	=	=	=	=

Table 3 (cont'd): Spatial strategy alternatives appraisal findings

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

- There is a strong argument for ruling out the 'bookend' options, notably -
 - Option 1 - which performs poorly in terms of socio-economic objectives, with a number of significant negative effects predicted; and
 - Option 8 - which performs poorly in terms of environmental objectives, and in terms of transport, with a number of significant negative effects predicted.
- The mid-range options are all associated with pros and cons, and necessitate close consideration.

Focusing on the mid-range options, points to note are -

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

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

The Council's response / justification for the preferred approach

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

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

- **Biodiversity** - Whilst lower growth would be preferable from a biodiversity perspective, the Council does not support lower growth given housing and economy/employment considerations. Furthermore, there is confidence in the ability to mitigate impacts and indeed deliver targeted biodiversity enhancement through site-specific measures. It is recognised that Wisley Airfield is particularly sensitive from a biodiversity perspective; however, the site performs well as a location for growth in other respects, and SPA mitigation measures have been developed in-line with best practice.

- **Climate change** - Whilst higher growth options would perform better (on the assumption that additional development would be concentrated at strategic sites, and hence there would be good potential to deliver district heating schemes and so minimise per capita CO₂ emissions), this is not an overriding consideration.
- **Economy** - The appraisal predicts significant negative effects to result from the preferred option, on the basis that it will not make a contribution to meeting unmet housing need within the HMA, which is also a FEMA. However, the Council believes that a positive strategy for economic growth is set to be put in place, ensuring that opportunities associated with Guildford Town and the A3 corridor are realised in full. Whilst additional housing in Guildford Borough might in theory support realisation of economic growth opportunities within the FEMA, in practice it is not clear that this would be the case as employment growth forecasts are not necessarily set to be met. Furthermore, the situation is complex given a need to avoid an imbalance of housing and employment locally (as this would have implications for commuting, and in turn traffic congestion), and given a need to recognise the constraints to growth that make Guildford an attractive location for business. The Council awaits the views of the Local Enterprise Partnership (LEP) on this matter.
- **Employment** - The appraisal suggests that a higher growth option involving Clandon Golf would be preferable, as this site would deliver additional employment land; however, this site performs poorly in certain respects (e.g. landscape). The Council has put in place a balanced strategy for housing and employment growth that seeks to meet needs and also aligns with a strategy for infrastructure upgrades. Housing and employment growth at Clandon Golf would not align with the strategy, notably because it is divorced from the Sustainable Movement Corridor; and the employment proposed on this site is also less preferable compared to that at proposed allocations.
- **Historic environment** - Whilst lower growth would lead to fewer risks, there is confidence in the ability to avoid/mitigate effects through site-specific measures. Comments received from Historic England - in respect of development at the more sensitive sites - have been taken into account and reflected in site-specific policy; however, the Council recognises that stakeholders will have further comments to make (including in respect of in-combination effects) and there may be potential to strengthen policy further.
- **Land** - Whilst lower growth would obviously result in reduced loss of agricultural land, it is not clear that there are notable opportunities to make better use of lower quality agricultural land. Sites removed from the strategy could well be non 'best and most versatile'.
- **Landscape** - The appraisal finds the preferred option to perform well as a large scheme at Wisley Airfield avoids the need to place pressure on the most sensitive Green Belt and/or landscapes designated as being of larger-than-local importance. Whilst low growth would be preferable, the Council is confident in the ability to mostly ensure landscape impacts that are of no more than very local significance, given proposed policy aimed at guiding masterplanning, layout, design and landscaping. A strategic development at Blackwell Farm poses particular issues, from a landscape perspective, however a number of steps have been taken to minimise conflicts since the time of the 2014 draft plan. Capacity has been reduced from 2,250 to 1,800 homes, and whilst the site still requires an access off the A31, the reduced capacity now enables the use of the existing access road, Down Place. This road, which runs through both AONB and AGLV, will require upgrading; however, this can be achieved whilst retaining and enhancing the tree cover present along its length.
- **Housing** - The preferred option performs well as it will put in place a strategy for meeting the borough's OAN; however, it is recognised that the strategy will likely result in unmet housing needs within the HMA (on the assumption that the Waverley Local Plan will not provide for all unmet needs arising from under-supply in Woking). Higher growth options would perform better, but would be problematic in terms of a range of environmental (and transport) issues/objectives, given local sensitivities. It is far from clear that Guildford is relatively unconstrained / suited for growth above OAN in the sub-regional context. This is the finding of the SA work, but it is also worth noting that the Council's work to consider safeguarding options has also led to the same conclusion. The Council has looked into safeguarding sites, in addition to allocations, in order to negate the need for a Green Belt review until 'well beyond the plan period' (in-line with Government guidance); however, no opportunities are apparent. Given that Government Guidance advocates safeguarding land 'between the urban area and the Green Belt', which in practice would mean safeguarding sites on the edge of the Guildford urban area, considerations include -
 - Major constraints to the north (SPA) and south (AONB) of the urban area would necessitate

safeguarding land to the east and/or west, resulting in an oblong-shaped urban area with communities some distance from the centre.

- There is inevitably a limit to the extent that Guildford urban area can expand before it would begin to merge with surrounding villages, with detrimental impacts to local character and village communities.
- **Transport** - Whilst lower growth would lead to fewer risks, there is confidence in the detailed work that has been undertaken in support of the emerging preferred strategy, which highlights that there is potential to avoid severe impacts. It is important to stress that the preferred option is predicated on the delivery of the necessary infrastructure:
 - The Infrastructure Schedule accompanying the plan outlines the key infrastructure needed to support the development planned, focussing particularly on the first five years of the plan period and the strategic development sites.
 - During the plan period Guildford will experience significant improvements in transport infrastructure including new rail stations at Guildford West (Park Barn) and Guildford East (Morrow), over twenty schemes to address 'hotspots' on the Local Road Network and a new park and ride site at Gosden Hill Farm. A Sustainable Movement Corridor, providing a priority route for buses, pedestrians and cyclists through the Guildford Urban area and serving new communities at Blackwell Farm, Gosden Hill Farm and Slyfield Area Regeneration Project, will be delivered.
 - Delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford. The Department for Transport's Road Investment Strategy includes schemes for the A3 Guildford and the M25 Junction 10/A3 Wisley interchange; and interim 'quick win' schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered.

APPRAISAL FINDINGS AT THIS STAGE

Part 2 of the SA Report answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the Draft Plan. The appraisal comprises a series of narratives each examining the draft plan in terms of one element of the SA framework (see Table 1, above). Summary findings are presented here.

Biodiversity

A range of important policy measures are proposed, and it is apparent that a robust strategy is set to be implemented in respect of Suitable Alternative Natural Greenspace (SANG) delivery, i.e. there can be confidence in the quality of SANG provision, as well as the quantity; however, there remains the possibility of significant negative effects. Even recognising that site-specific work has identified good potential for biodiversity mitigation and enhancement, there is an argument to suggest that an alternative strategy could potentially perform better from a biodiversity perspective. A lower growth strategy is not necessarily suggested, recognising that other boroughs in the sub-region are also heavily constrained, but an alternative distribution strategy could possibly be foreseen whereby there is less impact (or risk of impact) on locally important sites (SNICs), and also less risk to the Thames Basin Heaths SPA (albeit it is recognised that Habitats Regulations Assessment has established no likelihood of significant adverse effects). At this stage, recognising that there remain some uncertainties regarding policy detail (e.g. masterplanning/layout for strategic sites) and the baseline (e.g. SNICs are under review), it is appropriate to predict **uncertain effects**, and recommend that additional work be undertaken to avoid/mitigate effects.

Climate change

Car travel is a key issue in that it has a major bearing on per capita CO₂ emissions; however, this matter is best considered below under 'Transport'. It is therefore appropriate to focus here on matters relating to per capita CO₂ emissions from the built environment. 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, it is not possible to conclude significant positive effects.

Communities

Assuming appropriate phasing of infrastructure delivery alongside housing growth (as required by Policy I1), 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 ideal, and many uncertainties exist. **Significant positive effects** are predicted, but with some uncertainty.

Economy and employment

The plan performs well on the basis that identified opportunities are set to be capitalised upon, notably opportunities to support economic growth within the Functional Economic Market Area (FEMA) through new housing and employment floorspace, and also the specific opportunity of growing the Guildford knowledge-based sector. **Significant positive effects** are predicted.

Flooding

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, it is not clear that there would be significant positive effects.

Health

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 some uncertainty.

Historic environment

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 (within Guildford Town Centre, in particular). 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**; however, it is not possible to conclude significant positive effects.

Housing

The plan sets out to meet the objectively assessed housing need (OAN) 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 are also some question-marks regarding the housing trajectory (and in particular the supply of housing in the early part of the plan period); however, these are detailed matters that will benefit from open discussion during the plan's examination. 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; however, there remains some uncertainty regarding delivery of an appropriate housing mix more generally.

Land

The plan will result in significant loss of agricultural land, including significant loss of land that is grade 3a quality and therefore classified as 'best and most versatile' in the national context (albeit grade 3a is the lowest class of 'best and most versatile' land, with it not being the case that the plan will result in significant loss of better quality grade 1 or grade 2 land). On this basis, it is appropriate to predict **significant negative effects**. However, it is equally the case that much growth will be directed to brownfield locations, both within urban areas, and within the Green Belt.

Landscape

The plan will result in limited impacts to the nationally important AONB, the sub-regionally important AGLV and Green Belt identified as most 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 would be one whereby development will come forward in an unplanned way, it is appropriate to conclude **significant positive effects**.

Poverty and social exclusion

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.

Previously developed land

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, 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.

Rural economy

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 this 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 2,100 home mixed use development) is in a relatively rural location.

Safety and security

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, it is not possible to conclude the likelihood of significant positive effects.

Transport

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, and at locations in proximity to a rail station. Policy commitments regarding the phasing of infrastructure are also of critical importance. **The plan performs well**; however, it is not possible to conclude the likelihood of significant positive effects.

Waste

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 (Sustainable design, construction and energy) sets out to ensure that opportunities are fully realised. **The plan performs well**; however, it is not possible to conclude the likelihood of significant positive effects.

Water quality and resources

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 Water Framework Directive objectives.

Conclusions at this current stage

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

Next steps

Part 3 of the SA Report answers – *What happens next?* – by discussing plan finalisation and monitoring.

Plan finalisation

Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination, a government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

If found to be 'sound' the plan will be formally adopted by the Council. At that time an 'SA Statement' will be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

Monitoring

At the current time, there is a need only to present 'measures envisaged concerning monitoring'. The draft plan includes a range of proposed monitoring indicators, and from this list it is suggested (given appraisal findings presented above) that following are of particular importance from an SA perspective:

- The number of new homes completed each year - given the importance of housing to a range of social and economic objectives.
- Delivery of different size and types of housing compared to the identified mix in the Strategic Housing Market Assessment - given the range of specific needs that exist, and which can tend not to be met by the market.
- Low and zero carbon decentralised energy networks - given the considerable opportunity that exists to reduce average per capita CO₂ emissions from the built environment.
- Walking, cycling, bus and rail modal share for travel to work journey in Guildford borough - given the importance to health, climate change and traffic (and thereby economy) objectives.
- Net gains in biodiversity provided by development - given the need to plan in-line with landscape scale strategy, as established by the Surrey Nature Partnership.