Sustainability Appraisal (SA) of the Guildford Borough Local Plan

SA Report

June 2016
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### REVISION SCHEDULE

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<td>June 2016</td>
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INTRODUCTION
1 BACKGROUND

1.1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Guildford Borough Local Plan. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.

2 SA EXPLAINED

2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).

2.1.2 In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the draft plan that essentially ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.

2.1.3 More specifically, the SA Report must answer the following three questions:

1. What has Plan-making / SA involved up to this point?
   – Including with regards to consideration of ‘reasonable alternatives’.

2. What are the SA findings at this stage?
   – i.e. in relation to the draft plan.

3. What happens next?
   – What steps will be taken to finalise the plan?
   – What measures are proposed to monitor plan implementation?

2.1 This SA Report

2.1.1 This document is the SA Report for the Guildford Borough Local Plan, and as such each of the three SA questions is answered in turn below, with a ‘part’ of the report dedicated to each.

2.1.2 Before answering Question 1, two initial questions are answered in order to further ‘set the scene’: i) What is the plan trying to achieve?; and ii) What’s the scope of the SA?

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

2 To be clear, the SA process incorporates the SEA process. SA and SEA are one and the same process, differing only in terms of substantive focus. SA has an equal focus on all three ‘pillars’ of sustainable development (environment, social and economic).

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

4 See Appendix I for further explanation of the regulatory basis for answering certain questions within the SA Report, and a ‘checklist’ explaining more precisely where within this report certain regulatory reporting requirements are met.
3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1.1 Once in place, the Local Plan will establish a spatial strategy for growth and change in the Borough over the next 15 years, allocate sites and establish the policies against which planning applications will be determined.

3.1.2 The Local Plan will be in general conformity with the National Planning Policy Framework (NPPF), and in-line with planning legislation and regulations including the Localism Act 2011. The Act places a duty on the Council to co-operate with neighbouring authorities - including Woking Borough, Elmbridge Borough, Mole Valley District, Waverley Borough, Rushmoor Borough and Surrey Heath Borough. Similarly, the Council is required to cooperate with other authorities such as Surrey County Council and Highways England.

3.1.3 The Local Plan seeks alignment with the Council’s Corporate Plan 2015-20, which establishes the ambition for Guildford to be “a town and rural borough that is the most desirable place to live, work and visit in South East England.” The Corporate Plan goes on to explain that:

“We want Guildford to be a centre for education, healthcare, innovative and cutting-edge businesses, high quality retail and wellbeing. A county town set in a vibrant rural environment which balances the needs of urban and rural communities alike. Known for our outstanding urban planning and design, and with infrastructure that will properly cope with our needs.”

3.1.4 The Corporate Plan identifies a series of themes for action, each of which in turn is associated with a series of objectives. The relevant themes that emerge from the Corporate Plan are -

• “Our Borough - ensuring that proportional and managed growth for future generations meets our community and economic needs.
• Our Economy - improving prosperity for all by enabling a dynamic, productive and sustainable economy that provides jobs and homes for local people.
• Our Infrastructure - working with partners to deliver the massive improvements needed in the next 20 years, including changes to tackle congestion issues.
• Our Environment - improving sustainability and protecting our countryside, balancing this with the needs of the rural and wider economy.
• Our Society - believing that every person matters and concentrating on the needs of the less advantaged.”

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

• Deliver sufficient sustainable development that meets all identified needs.
• Improve opportunities for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities.
• Ensure that all development is of high quality design and enables people to live safe, healthy and active lifestyles.
• Retain the distinct character and separate identities of our settlements.
• Protect and enhance our heritage assets and improve the quality of our built and natural environment.
• Protect those areas designated as Thames Basin Heaths Special Protection Area, Special Areas of Conservation, Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty for their biodiversity and landscape characteristics.
• Ensure that new development is designed and located to minimise its impact on the environment and that it mitigates, and is adapted for, climate change.
- Maintain and enhance our role as one of the County's key employment locations in both a strategic and local context by providing and protecting a range of employment sites in appropriate locations.

- Reinforce our role as a world leader in innovation and research, with a particular focus on bio-technology, space and electronic gaming industries, and the sustainable growth of Surrey Research Park and the borough’s other business hubs.

- Support and expand the economic vitality of our rural areas whilst protecting existing heritage, landscape and character

- Reinforce Guildford’s role as Surrey County’s premier town centre destination whilst protecting and enhancing its cultural facilities and heritage assets.

3.2 What is the Local Plan not seeking to achieve?

3.2.1 It is important to emphasise that the plan will be strategic in nature. This plan will establish some thematic policy, but 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. Equally, the allocation of sites / establishment of site-specific policy through this plan should also be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues (in the knowledge that they can be addressed at the planning application stage).

3.2.2 The strategic nature of the Local Plan is reflected in the scope of the SA.
4 WHAT’S THE SCOPE OF THE SA?

4.1 Introduction

4.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of (and provide a broad methodological framework for) SA.

4.1.2 Further information on the scope of the SA – i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability ‘context’ and ‘baseline’ - is presented in Appendix II.

Consultation on the scope

4.1.3 The Regulations require that “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies.” In England, the consultation bodies are Natural England, the Environment Agency and Historic England. 5 As such, these authorities were consulted on the SA scope in 2013.6 Since that time, the SA scope has evolved as new evidence has emerged - however, the scope remains fundamentally similar to that agreed through the dedicated scoping consultation in 2013.

N.B. Stakeholders are also welcome to comment on the SA scope at the current time. Any comments received will be taken into account in due course (see Part 3 ‘Next Steps’).

4.2 Key issues / objectives

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

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

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

<table>
<thead>
<tr>
<th>Sustainability objectives</th>
<th>Sustainability issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Conserve and enhance biodiversity and the natural environment</td>
<td>Large areas of the borough are covered by biodiversity designations, including internationally important SPAs / SACs, nationally important SSSIs, locally important SNCIs and ancient woodland. There is also a need to target conservation efforts within the landscape scale biodiversity opportunity areas promoted by the Surrey Nature Partnership. There is a need to provide opportunities for countryside recreation and access whilst respecting its landscape quality and avoiding conflicts.</td>
</tr>
<tr>
<td>2. Mitigate climate change through reducing emissions of greenhouse gases</td>
<td>Government policy requires new development to promote sustainable construction, energy conservation and renewable energy.</td>
</tr>
<tr>
<td>3. Create and sustain vibrant communities</td>
<td>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.</td>
</tr>
<tr>
<td>4. Maintain Guildford borough and Guildford town’s competitive economic role</td>
<td>Support growth in line with the Enterprise M3 Local Enterprise Partnership’s Strategy Economic Plan, which identifies Guildford as a Growth Town. The high cost of housing prevents essential workers from living in much of the borough, affecting the ability of businesses to recruit employees.</td>
</tr>
<tr>
<td>5. Facilitate appropriate employment development opportunities to meet the changing needs of the economy</td>
<td>Maintain a diverse and targeted supply of employment land, suited to the local workforce and recognising the changing needs of business.</td>
</tr>
<tr>
<td>6. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</td>
<td>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).</td>
</tr>
<tr>
<td>7. Facilitate improved health and well-being of the population, including enabling people to stay independent and reducing inequalities in health</td>
<td>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.</td>
</tr>
</tbody>
</table>

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7 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

<table>
<thead>
<tr>
<th>Objective</th>
<th>Description</th>
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<tbody>
<tr>
<td>8.</td>
<td>Protect, enhance, and where appropriate make accessible, the archaeological and <strong>historic environments</strong> and cultural assets of Guildford, for the benefit of residents and visitors</td>
</tr>
<tr>
<td>9.</td>
<td>Provide sufficient <strong>housing</strong> of a suitable mix taking into account local housing need, affordability, deliverability, the needs of the economy, and travel patterns</td>
</tr>
<tr>
<td>10.</td>
<td>Minimise the use of best and most versatile (BMV) agricultural <strong>land</strong> and encourage the remediation of contaminated land</td>
</tr>
<tr>
<td>11.</td>
<td>Conserve and enhance <strong>landscape character</strong></td>
</tr>
<tr>
<td>12.</td>
<td>Reduce <strong>poverty and social exclusion</strong> for all sectors of the community</td>
</tr>
<tr>
<td>13.</td>
<td>Make the best use of <strong>previously developed land and existing buildings</strong></td>
</tr>
<tr>
<td>14.</td>
<td>Enhance the borough’s <strong>rural economy</strong></td>
</tr>
<tr>
<td>15.</td>
<td>Create and maintain <strong>safer and more secure communities</strong></td>
</tr>
</tbody>
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### Sustainability issues

<table>
<thead>
<tr>
<th>Objective</th>
<th>Description</th>
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<tbody>
<tr>
<td>8.</td>
<td>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 <strong>distinct place</strong>.</td>
</tr>
<tr>
<td>9.</td>
<td>High average house prices create <strong>affordability problems</strong> for local people, first time buyers and essential workers.</td>
</tr>
<tr>
<td></td>
<td>There is a deficit in <strong>affordable housing supply</strong> and the current completion rate is below the annual level required to address the deficit.</td>
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<tr>
<td></td>
<td>There is a need to meet the identified accommodation needs of the <strong>Traveller community</strong>, and ensure that sites are well located in relation to services, facilities, education etc. with a view to addressing current issues (e.g. poor health).</td>
</tr>
<tr>
<td></td>
<td>The need for <strong>accommodation for people with care and support needs</strong> is likely to increase, given the projected increase in the proportion of older people.</td>
</tr>
<tr>
<td>10.</td>
<td>Contamination issues may arise on <strong>previously developed sites</strong>.</td>
</tr>
<tr>
<td>11.</td>
<td>Development pressures, fuelled by high land and property prices, pose <strong>threats</strong> to landscape interests.</td>
</tr>
<tr>
<td></td>
<td>Existing areas of high quality <strong>open space</strong> should be protected and enhanced to avoid changes to the character of built up areas and to reduce pressures on the countryside.</td>
</tr>
<tr>
<td>12.</td>
<td>Any <strong>pockets of deprivation</strong> need to be addressed, recognising that the index of multiple deprivation dataset shows some notable increases in variation.</td>
</tr>
<tr>
<td></td>
<td>There are a significant number of adults with no <strong>qualifications</strong>.</td>
</tr>
<tr>
<td>13.</td>
<td>Reusing previously developed land (PDL) will reduce pressure on the undeveloped areas of the countryside; however, the <strong>supply</strong> of previously developed land in the borough is likely to decline over time and therefore development of greenfield sites might be required.</td>
</tr>
<tr>
<td>14.</td>
<td>There is a need to support agriculture and other rural <strong>businesses;</strong> and also a need to support affordable <strong>housing</strong> in villages.</td>
</tr>
<tr>
<td>15.</td>
<td>Crime is not a major issue for the Local Plan, although that some metrics are of note (e.g. violent <strong>crime</strong> has increased significantly since 2001).</td>
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<tr>
<td></td>
<td>As well as actual occurrences, there is a need to address the <strong>perception of crime</strong>.</td>
</tr>
<tr>
<td></td>
<td>Ensure the <strong>safety</strong> of pedestrians and cyclists.</td>
</tr>
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Sustainability objectives | Sustainability issues
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16. Achieve a pattern of development which minimises journey lengths and encourages the use of sustainable forms of transport (walking, cycling, bus and rail) | For those without a car, access to a range of facilities in rural areas is an issue.

There are currently no Air Quality Management Areas (AQMAs) in the borough; however, there are some hotspots of lesser air quality.

Adverse economic, social and environmental impacts of high traffic volumes and a culture of dependence on private car use include recurrent traffic congestion on certain parts of the network at certain times of day, road collisions, community severance, obesity, noise pollution, localised air pollution, greenhouse gas emissions, high demand for parking, and amenity of local neighbourhoods.

17. Reduce waste generation and achieve the sustainable management of waste | There is an identified need to reduce the proportion of waste sent to landfill and increase the proportion of waste that is recycled and composted.

18. Maintain and improve the water quality of the borough’s rivers and groundwater, and to achieve sustainable water resources management | River quality is generally poor and should be improved, recognising that climate change is set to impact (e.g. because of low flows). Groundwater is also a constraint, with approximately 30% of the Borough located on principle aquifers and the presence of 14 source protection zones (SPZ).

Has the SA framework been updated recently?

4.2.2 Some minor updates have been made to the SA framework, since 2014 (when the SA framework was presented within the Interim SA Report published at that time). Updates are as follows:

- With regards to the objectives –
  - There are no longer grouped under topic headings, and are now listed in alphabetical order (according to the bold text).
  - An objective has been added relating to landscape, to reflect the degree of interest in this subject.
  - The objective relating to climate change has been modified to clarify that the focus is mitigation (recognising that adaptation is best considered under other headings).

- With regards to the issues –
  - A number of edits have been made to reflect latest evidence / understanding (e.g. added reference to groundwater, to reflect Environment Agency representations).
  - Notably: An issue relating to equalities considerations (‘protected groups’) has been added under objective 3; and the issues listed under the two economy-related objectives (objectives 4 and 5) have been modified in order to ensure a clear distinction.

- The indicators that were listed alongside objectives and issues in the 2014 report have been removed. Indicators are returned to in chapter 31 (‘Monitoring’).
4.3 **A note on ‘health’ and ‘equalities’ considerations**

**Health**

4.3.1 The NPPF requires that Local Plans promote healthy communities and reflect an evidence-based assessment of health and wellbeing needs. In line with the Marmot Review into health inequalities in England (2010), planning for health in the context of Local Plans primarily involves planning for *determinants of health*, including those related to the quality of the natural and built environment, daily activities and lifestyles, communities and the economy.

4.3.2 In the case of the Guildford Borough Local Plan, health considerations were a focus of SA scoping work (leading to the development of a health focused SA objective – see objective 7 in Table 4.1); and so the SA process can be said to ‘integrate’ Health Impact Assessment (HIA). Health issues/impacts are discussed as part of appraisal text within this report.

*Figure 4.1: Determinants of health and wellbeing, from Barton & Grant (2006)*

**Equalities**

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

4.3.4 In the case of the Guildford Local Plan, equalities considerations were not an explicit focus of SA scoping work; however, in-light of an Equalities Impact Assessment (EqIA) Screening Assessment,\(^8\) the SA scope has now been supplemented with reference to equalities as a key issue under SA objective 3 (“Create and sustain vibrant communities”). As such, the SA process can now be said to ‘integrate’ Equalities Impact Assessment (EqIA). Equalities issues/impacts are discussed as part of appraisal text within this report.

\(^8\) See [http://www.guildford.gov.uk/media/15422/Equalities-Screening/pdf/EqIA_screening_Local_Plan_Strategy_and_Sites_Issues_and_Options.pdf](http://www.guildford.gov.uk/media/15422/Equalities-Screening/pdf/EqIA_screening_Local_Plan_Strategy_and_Sites_Issues_and_Options.pdf)
PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?
5 INTRODUCTION (TO PART 1)

5.1.1 Local plan-making has been underway since late 2012 (building upon earlier work on a Core Strategy), with two formal consultations having been held (under Regulation 18 of the Local Planning Regulations) prior to this current stage (Regulation 19), and two Interim SA Reports having previously been published.

5.1.2 Rather than recap the entire 'story' in detail, the intention here is to explain the work undertaken in 2015/16, which led to the development of the draft plan that is currently the focus of appraisal (see Part 2, below) and is currently published under Regulation 19.

5.1.3 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 appraisal findings when finalising the Proposed Submission Plan.

5.1.4 More specifically still, this part of the report sets out to present information regarding the consideration of reasonable alternative spatial strategies, i.e. alternative approaches to the allocation of land to meet housing (and economic) needs.

N.B. This information is important given regulatory requirements, specifically the requirement to present (within the SA Report) an appraisal of ‘reasonable alternatives’ and ‘an outline of the reasons for selecting the alternatives dealt with’.

What about other plan issues?

5.1.5 Whilst the plan objectives (see chapter 3, above) are numerous and cover a range of issues, it is apparent that the key issue/objective relates to the allocation of land to meet housing needs. Hence it is reasonable that alternatives appraisal should focus on this matter. Whilst the plan is set to address a range of other issues, in 2016 it was recognised as reasonable and proportionate that policy approaches for other issues need not be the focus of formal alternatives appraisal, in the run up to finalising the proposed submission plan for publication. This decision was taken in the knowledge that other plan issues have been the focus of alternatives appraisal in the past, and by 2016 understanding of strategic options/choices had narrowed. For further discussion of other plan issues, including discussion of how past alternatives appraisal has fed-in, please see Appendix III.

What about site options?

5.1.6 The Council has led on work to appraise site options - i.e. the pool of sites available, deliverable and potentially suitable for allocation through the plan – against the SA framework. Site options were first appraised in 2014 (with appraisal findings presented within the Interim SA Report published at that time) and appraisal findings subsequently updated in 2015/16. However, it is not suggested that site options appraisal findings should be a focus of attention at the current time. The role of site options appraisal within the SA process has primarily been to provide an evidence base to enable development of spatial strategy alternatives. As such, site options appraisal is not given further explicit attention within this part of the report. Specific sites are discussed as part of the justification for developing alternative spatial strategies, but formal site options appraisal findings are presented only in Appendix IV.

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9 Environmental Assessment of Plans and Programmes Regulations (2004)

10 In line with the Environmental Assessment of Plans and Programmes Regulations (2004), a decision on what ‘reasonably’ should be the focus of alternatives appraisal should be made in-light of the plan objectives. In the case of the Guildford Local Plan, it is suggested that plan objective - “To deliver sufficient sustainable development that meets all identified needs” – is somewhat overarching. N.B. Recent case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SA process / report that is focused and accessible.

11 In other words, site options appraisal was undertaken as a means to an end (i.e. development and appraisal of reasonable alternatives), rather than an end in itself. It is worth noting that site options are not ‘alternatives’ in the sense that there is no mutually exclusive choice to be made between them.
Structure of this part of the report

5.1.7 This part of the report is structured as follows:

**Chapter 6** - explains reasons for selecting the alternatives dealt with

**Chapter 7** - presents an appraisal of the reasonable alternatives

**Chapter 8** - explains reasons for selecting the preferred option.
6 DEVELOPING THE REASONABLE ALTERNATIVES

6.1 Introduction

6.1.1 This chapter explains the work undertaken in late 2015 / early 2016 to develop ‘reasonable’ spatial strategy alternatives. This chapter:

- explains the context and background to alternatives development; and then
- explains the stepwise process followed in order to establish reasonable alternatives.

6.2 Context and background

6.2.1 This section discusses lessons learned at two key stages in the plan-making / SA process, namely:

1) the 2013 Issues and Options stage; and

2) the 2014 Draft Plan stage.

The Issues and Options stage (2013)

6.2.2 The consultation document, which was published in October 2013 alongside an Interim SA Report, discussed a series of ‘issues’ in turn. In some cases the discussion led to a series of alternatives (i.e. mutually exclusive options), whilst in other cases the discussion led to the identification of suggested approaches/options for comment.

6.2.3 Chapter 9 of the document dealt with spatial strategy, with the Council inviting comments on: all of the site options understood at that time to be available and potentially deliverable; and seven alternative ‘examples’ of how sites might be delivered in combination in order to meet objectively assessed needs (which were yet to be established). Box 6.1 explains more about the thinking behind the seven alternative spatial strategy examples.

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

Presenting the seven examples was a mechanism to explain that:

- There are certain ‘givens’ including the need to maximise redevelopment of appropriate buildings and spaces in the towns and villages, use land on the edge of villages to provide affordable housing and use previously developed land in the countryside.

- There are certain strategic ‘choices’ relating to whether or not, and to what extent, the Council should support growth at -
  - countryside beyond the Green Belt (CBGB), which is found in the west of the borough;
  - countryside in the centre of the borough, around the edge of Guildford Town;
  - countryside around certain existing villages, in order deliver expansion;
  - countryside around one or more village in order to deliver significant expansion; and
  - a location in the countryside in order to deliver a new village.

12 See http://www.guildford.gov.uk/article/3976/Issues-and-Options

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

14 So-called ‘rural exception sites’, which the NPPF defines as: ‘Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.”
6.2.4 The Interim SA Report published alongside the 2013 consultation document went a step further, in that it defined (and then appraised) spatial strategy alternatives with an added degree of spatial specificity. The approach taken recognised that, whilst the spatial strategy is a ‘given’ under a max growth scenario and under a low growth scenario, under medium growth scenarios there are clear choices to make regarding spatial strategy. The overall conclusion of the spatial strategy alternatives appraisal (reached after having examined the performance of each option in terms of the SA framework) is summarised in Box 6.2.

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

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

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

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

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

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

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

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15 Under a low growth scenario, the Council recognised that - after maximising redevelopment of appropriate buildings and spaces in the towns and villages, using land on the edge of villages to provide affordable housing and using previously developed land in the countryside – the shortfall would be met by delivering some (limited) growth to the countryside around Guildford Town and some (limited) growth to the countryside in the west of the borough.
6.2.6 The consultation generated a high degree of interest, and a note setting out findings of the consultation was published in early 2014. High level points raised, in relation to the spatial strategy, included the following:

- Enterprise M3 stated that: “As a general principal [Enterprise M3] supports the idea of development that has good infrastructure links, including those to public transport, educational establishments in addition to strong links to local labour markets and such characteristics are often found in key economic centres such as Guildford. Enterprise M3 encourages options for new development that integrate well with existing facilities and opportunities for employment.” A more specific view was: “Guildford is the main town and economic powerhouse for the Borough and plays a key part in the wider Enterprise M3 area. It needs to be able to accommodate new development to ensure the future vitality and prosperity of the town and its surroundings.”

- Historic England stated, in relation to the spatial strategy options, that: “It would be inappropriate at this stage, and in the absence of detailed heritage impact assessments, to indicate a preference for one scenario or combination of two scenarios.” However, HE did emphasise the need to “recognise that the success of Guildford town centre as leading regional service and retail destination is underpinned by the its high quality character and appearance as an historic town, which makes its offer distinctive form many competing centres.” More specifically, in relation to Green Belt development around the edge of Guildford, HE stated that: “The development of the areas indicated on the scale suggested would also potentially have implications for the character of Guildford and its setting, removing some of the historical association between town and country that underpins the town’s traditional relationship with its rural hinterland.” Also, in relation to growth at villages, HE stated that: “Any consideration of the retention or exclusion of settlements from the Green Belt should include an assessment of the historic character of the villages being reviewed and the desirability of preserving their setting and special character. It may be that designation as conservation areas of historic villages excluded from the Green Belt could be a means of managing development and protecting character and appearance.”

- The Environment Agency also declined to suggest a preferred spatial strategy option, but did state their position as follows: “[W]e would prefer the approach of redeveloping appropriate buildings and brownfield sites prior to developing on greenfield land. However, we acknowledge that to meet your estimated development need you will have to develop greenfield areas. In all instances and to facilitate the required development you should consider the potential risk from contamination to controlled waters resulting from existing or previous land uses. Additionally you should consider the groundwater vulnerability of each designation such as the proximity of a principal aquifer or source protection zone. We would expect a sequential approach to be taken relating flood risk, the impacts on water quality and resources and the impact on biodiversity when considering the location of the developments (i.e. locating development in the most suitable areas with the least impact on biodiversity and from flooding). Furthermore, we would seek that the required supporting infrastructure (e.g. water resources and supply, waste disposal and treatment, etc...) has been satisfactorily considered, addressed and implemented prior to any allocation and/or development as to minimise the impacts on the environment resulting from any potential short-comings.” A number of more specific points, with implications for the spatial strategy, were also made including:

- “In the outcome of conducting further assessments around other villages and settlements and if you decide to explore the option of designating development further south closer to Waverley BC, you will need to consider the high risk Lower Greensand groundwater. Within this locality the Lower Greensand is exposed at surface and this is factor should be taken into consideration in addition to all other relevant factors.”

- “If the former Wisley airfield site is pursued there would be the opportunity to investigate and address any potential contamination issues that may have an impact on controlled waters. Additionally any proposed development should protect and enhance the river and the river corridor.”
• Waverley Borough Council suggested that: “A key issue will be to ensure that the number of homes being planned for takes account of the economic needs of the borough and contributes to addressing the commuting patterns.” More specifically, WBC emphasised the need to be “explicit in recognising the sub-regional role that Guildford plays in terms of a centre for employment, education, leisure and retailing.” More specifically still, in relation to Ash and Tongham, WBC stated that: “[T]he Council would welcome the opportunity to consider the wider impact of potential land releases in this area not just within Guildford Borough but also any sites that may come forward in Waverley around Badshot Lea and the eastern outskirts of Farnham.”

• Affinity Water suggested, in relation to ‘the settlement hierarchy’, that it is: “Sensible to focus new development on the edge of large and medium sized villages which offer a range of easily accessible shops and services such as West Horsley.” Similarly, AW stated that: “Importantly, when reviewing Green Belt boundaries, the Council needs to be confident that sufficient land is being made available for housing and employment growth within the plan period and beyond. If insufficient Green Belt land is released, there is a danger that additional boundary changes will need to be made at the time of the next Local Plan review.”

• Thames Water stated that: “In very general terms it is quicker to deliver infrastructure on a small number of clearly defined large sites than it is in a large number of small sites, which may not be clearly defined. Thames Water would also prefer for growth to be distributed relatively evenly around the existing main urban centres. It is vital infrastructure in place ahead of development if sewer flooding and low / no water pressure issues are to be avoided. It is also important not to under estimate the time required to deliver necessary infrastructure, for example: -local network upgrades take around 18 months - Sewage Treatment & Water Treatment Works upgrades can take 3-5 years - New water resources & treatment works can take 8-10 years.”
The ‘Draft Local Plan: Strategy and sites’ consultation (2014)\textsuperscript{16}

6.2.7 The \textit{consultation document}, which was published in summer 2014 alongside an Interim SA Report, presented 19 draft borough-wide policies and c.100 site allocation policies. The site allocations were grouped according to their relationship with the broad strategy (e.g. ‘within village’ sites were grouped together) and presented across a series of maps. Also, a completed proforma was presented for each site allocation listing information on (amongst other things) planning ‘considerations’ and ‘opportunities’.

6.2.8 The consultation ran for 12 weeks (i.e. twice as long as standard practice) with extensive efforts made to ensure “every opportunity to engage people and make them aware about how they could submit their comments on the Draft Local Plan.”\textsuperscript{17} A range of consultation events were held to complement publication of the consultation – see Figure 6.2.

\textbf{Figure 6.2: Consultation calendar}

\begin{table}[h]
\centering
\begin{tabular}{|c|c|c|c|c|c|c|c|c|c|c|c|}
\hline
Week commencing Monday & 23 June & 30 June & 7 July & 14 July & 21 July & 28 July & 4 August & 11 August & 18 August & 25 August & 1 September & 8 September & 15 September & 22 September \\
\hline
Consultation Period & & & & & & & & & & & & & \\
\hline
Swan Lane drop-in & & & & & & & & & & & & & \\
\hline
Leafleting & & & & & & & & & & & & & \\
\hline
Pop-ups & & & & & & & & & & & & & \\
\hline
Outreach events & & & & & & & & & & & & & \\
\hline
Targeted meetings & & & & & & & & & & & & & \\
\hline
Workshops & & & & & & & & & & & & & \\
\hline
\end{tabular}
\end{table}

\textbf{Figure 6.1: The Draft Local Plan: Strategy and sites consultation document}

\textsuperscript{16} See http://www.guildford.gov.uk/draftlocalplan
The **Interim SA Report** published alongside the consultation document (for the second half of the 12 week consultation only)\(^6\) essentially:

**A)** answered the question “What has plan-making / SA involved up to this point?” by

i. Explaining work to develop and appraise alternatives in 2013 (thereby repeating information from the 2013 Interim SA Report); 

ii. Explaining how the Council drew upon alternatives appraisal findings when preparing the ‘Draft Plan: Strategy and sites’ document (i.e. explaining ‘justification’); and

iii. Presenting the findings of ‘site options appraisal’ work completed in the run-up to the consultation. Specifically, appraisal findings were presented for 135 site options.

**B)** answered the question “What are appraisal findings at this stage?” by presenting an appraisal of the draft plan (i.e. the ‘Draft Plan: Strategy and sites’ document).

In relation to (Aii), it is helpful to repeat the Council’s response to the appraisal of spatial strategy alternatives here – see **Box 6.3**. Also, in relation to (B), it is helpful to summarise draft plan appraisal findings from 2014 here – see **Box 6.4**.

**Box 6.3: Council’s response to spatial strategy alternatives appraisal 2014 (summarised)**

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

The main reason for the Council’s choice in terms of spatial strategy is the availability of suitable and deliverable sites. The spatial strategy set out in the Draft Local Plan is a hybrid of Options D and E. Both options considered at Issues and Options stage included a number of common elements such as redeveloping sites in towns and villages and developing rural exception and brownfield sites in the Green Belt, and non-Green Belt countryside in the west of the borough (Option E included about half of the land, Option D included all of it; the Draft Local Plan proposes development of part of this land). The draft plan includes two greenfield extensions on the edges of Guildford town, which reflects Option D. Also, in line with Option E, the Draft Local Plan also includes the expansion of villages by using greenfield land around them, and significantly expanding an existing village (land at Normandy / Flexford which is safeguarded for development subsequent to the plan period).\(^{19}\)

**Box 6.4: Brief summary of 2014 Draft Plan appraisal findings**

The appraisal concluded

- **Positive effects** in terms of: meeting housing needs; health (including due to specialist housing provision and support for active lifestyles), reduced car uses / increased accessibility; biodiversity, soil and water resources (given a focus on blue / green infrastructure); and heritage.

- **Minor or indirect positive effects** were predicted in terms of education (given a focus on linking housing to education and providing high quality student accommodation); economy and employment; landscape and climate change mitigation.

- **Negative effects** in terms of air/environmental quality (given a focus of development at Send and Ash/Tongham) and affordable housing needs (given that delivering the ‘objectively assessed housing need’ figure would not involve meeting identified **affordable** housing needs in full).

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\(^6\) N.B. The Council recognises that it was less than ideal to publish the Interim SA Report 6 weeks into the 12 week consultation, and regrets any confusion that was caused. However, it is worth nothing that publication of Interim SA Reports alongside consultation documents at Regulation 18 is essentially a voluntary exercise (with the Local Planning Regulations requiring only that the SA Report is published alongside the Proposed Submission Plan at the Regulation 18 stage).

\(^{19}\) The Council’s text from 2014 also went on to explain that an element of Option G had been integrated into the preferred strategy, namely the allocation of Wisley Airfield for a new settlement.
6.2.11 Consultation on the Draft Plan: Strategy and sites document (and the Interim SA Report) generated a very high degree of interest. More than 7,000 people responded providing over 20,000 comments, with 1,043 people attending the consultation events and over 1,600 people visiting the consultation hub at 25 Swan Lane, Guildford. High level points raised, in relation to the spatial strategy, included the following:

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

• Surrey Wildlife Trust highlighted a range of concerns, but in relation to the spatial strategy stated broadly that: “Where allocations would result in development of greenfield sites, we could only support these where [well located in terms of]: a) their adjacency/proximity to land of existing value for biodiversity conservation, and b) their potential value for enhancing landscape connectivity within Biodiversity Opportunity Areas.”

• Surrey Chamber of Commerce were supportive of a range of proposals, in particular the proposal at Blackwell Farm: “There are particular locational benefits to the proposed Blackwell Farm development as this will help to support three major centres of employment at the University, tenant companies on the Research Park and the Royal Surrey County Hospital by providing new homes within walking distance of potential workplaces and with good access to public transport, thus providing a solution to the major issue of affordable housing which has the knock-on effect of forcing people to commute long distances.”

• Several neighbouring local authorities responded:
  – Both Wokingham and Epsom and Ewell focused on housing numbers, with Epsom and Ewell stating: “Our key input to the process will be to register our concern regarding the provision of sufficient housing land moving-forward. In the absence of a Regional Spatial Strategy, there does not seem to have been, hitherto, an effective means for the Districts and Borough’s to cooperate over housing need. In particular, we would be concerned that SHMA’s should be configured to assess not only local needs but also the predictions for growth emanating from the Greater London Authority area. There needs to be strategic consideration given to whether London’s hinterland should be expected to take a proportion of the 42,000 – 50,000 new homes per annum that have been predicted by the GLA. If so, it cannot be assumed that any outward growth of the London conurbation would occur concentrically as in the 19th and early 20th centuries. There needs to be a planned strategic approach which ensures that growth is distributed to points where the appropriate infrastructure and services can be provided.”
  – Waverley similarly commented on housing numbers, and also highlighted spatial strategy concerns relating to congestion on the A3 and development in the west of Guildford Borough [for example stating: “The area is close to the Badshot Lea area of Farnham and the Council would welcome the opportunity to discuss with you the wider impact of any potential land releases not only in Guildford but also in the eastern outskirts of Farnham.”]
  – Elmbridge highlighted concerns regarding growth in the north east of Guildford, particularly at Wisley Airfield: “We query whether this is the right location for this scale of growth. The fundamental aim of the Metropolitan Green Belt is ultimately to prevent the spread of London. The site is located in the very north [east] of the borough where the Green Belt is already very fragmented and particularly vulnerable to additional development, a point that was noted by the Inspector for the examination into our Core Strategy. Further evidence should be provided to indicate why this site has been identified in preference to other sites having regard to the strategic significance of the Green Belt in this location. This should include the degree to which the site is regarded as “Brownfield”. In addition, we would like to raise the following key points…”
  – Surrey Heath Borough Council has a particular interest in the west of Guildford Borough, highlighting that: “Ash, Ash Vale and Tongham are part of the much wider Aldershot Built up Area which extends over a number of local authorities, including Surrey Heath. This area is often referred to as the Blackwater Valley urban area and its presence in the western area of Guildford Borough is significant component of the spatial pattern of development in the Borough.” They emphasise the importance of a strategic approach.
6.3 A stepwise process to develop reasonable alternatives

6.3.1 In light of the context/background discussed above, the Council went through the following step-wise process in 2016 to develop a set of ‘reasonable’ alternative spatial strategies:

1) Consider growth quantum options
2) Consider distribution options
3) Establish reasonable alternatives (varying in terms of both quantum and distribution).

Step 1: Consider growth quantum options

6.3.2 In line with para. 47 of the National Planning Policy Framework (NPPF), local planning authorities should: “use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with [principles of sustainable development].” As such, a Strategic Housing Market Assessment (SHMA) study was completed for the housing market area (HMA), which comprises the three West Surrey authorities of Guildford, Woking and Waverley.

6.3.3 The West Surrey SHMA, prepared by GL Hearn, was published in September 2015, thereby superseding the previous SHMA from 2013. The SHMA sets out to establish Objectively Assessed Housing Needs (OAN) at the functional scale of the West Surrey HMA, but is also able to establish OAN for each of the three component authorities. The report goes through a number of considerations in turn, before arriving at final OAN figures.

6.3.4 The starting point is the latest official ONS population and Government household projections, which are based on past trends and particularly influenced by the balance of people moving in and out of an area (migration) and by household formation rates (e.g. a household forms when a young person moves out of the family home). Within the SHMA, these matters are considered within Chapter 4 ‘Demographic Projections’, with a series of sensitivity tests applied (e.g. giving consideration to whether ONS migration rates should be adjusted upwards to better reflect likely future rates of migration out of London) before the conclusion is reached that demographic need in Guildford is 517 dwellings per annum (dpa).

6.3.5 The next step is to consider whether the demographic need figure should be adjusted upwards (‘uplifted’) in order to accommodate the needs of students. This is also covered within Chapter 4 of the SHMA, with the conclusion reached that: “In addition student growth moving forwards may be stronger than that seen over the period from which the [Demographic] Projections are derived. This could result in an increase in housing need of up to 500 homes (focused on Guildford) over the 2013-33 period or 25 homes per annum.”

6.3.6 The next step is to consider whether there is a need for an uplift to support expected economic growth based on past trends and/or economic forecasts. This is dealt with in Chapter 5 of the SHMA (‘Economic-driven Projections’), with the conclusion reached that Guildford and Woking must deliver housing over and above that necessary to meet demographic needs in order to support jobs growth (without increasing in-commuting). In Woking’s case the uplift is 130 dpa, whilst in Guildford’s case it 120 dpa.

6.3.7 Chapter 6 of the SHMA then considers whether there is a need for a further uplift in order to address affordable housing needs, recognising that entry level house prices in Guildford are almost 11 times the typical earnings of younger households. This is a particularly complex calculation, as affordable housing need can be influenced by changes in the ownership of existing housing stock and other supply-side factors (e.g. Council house building), not just by new-build development; however, the conclusion is reached that an uplift is needed.

20 See http://www.guildford.gov.uk/shma
6.3.8 Chapter 7 of the SHMA then considers whether there is a need for a further uplift to address housing **affordability** - i.e. respond to market signals - recognising that prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand. The SHMA evidence indicates that affordability pressures in the West Surrey HMA are significant, with housing costs having increased relative to earnings over the 2001-11 decade, whilst household formation and home ownership both fell. The conclusion is reached that an adjustment is necessary to address affordability, but that it should not be considered as additional to that needed to better meet affordable housing needs; rather, the two should be considered together. Specifically, the conclusion is that: “GL Hearn consider that the key impacts of improving affordability would be to improve younger people’s ability to form a household, reducing the numbers of younger people forced to live with parents or in shared accommodation. The impact of this has been modelled by adjusting household formation rates of those aged 25-34, increasing levels of household formation for this age group over time such that it reaches the 2001 levels by 2033…” Ultimately, the conclusion is reached that an uplift of 31 dpa is needed to address affordability / deliver affordable housing.

6.3.9 Taking account of demographic needs and the three uplifts, the conclusion is reached that the OAN figure for Guildford Borough is **693 dpa** – see **Figure 6.3**.

*Figure 6.3: Objectively assessed housing need figures assigned by the West Surrey SHMA*

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

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21 Woking’s adopted Core Strategy makes provision for 4,964 dwellings over the period 2010-2027, equating to 292 dpa, which is considerably less than the OAN figure assigned to Woking by the West Surrey SHMA.

22 To reiterate, in-line with Regulations, there is a need to give ‘an outline of the reasons’ when introducing the ‘reasonable alternatives’, i.e. when explaining options that are reasonable and unreasonable.
6.3.11 However, in order to meet OAN there is not a need to allocate land for precisely 693 dpa through the plan. Rather, in determining the number of homes to allocate through the plan, in order to meet OAN, there is a need to take into account:

A) Since the start of the plan period (2013), 1,378 new homes have been completed in the Borough, and planning permissions are in place to deliver a further 758 homes.

B) The borough has historically had high windfall development, and an element of windfall is expected to continue (excluding residential gardens). The assumption is 625 homes.

C) Policy will be put in place to support ‘rural exception sites’, and it is fair to assume that c.90 homes will be delivered over the plan period.

D) There is a need to plan for a contingency, or ‘buffer’, given the likelihood of some sites (particularly large sites) not delivering or delivering at a slower rate than anticipated.

6.3.12 As such, if OAN is to be achieved there is a need to allocate land to deliver:

693 dpa – (A+B+C) + D

6.3.13 However, delivering a quantum of growth to meet the Borough’s OAN is not the only option. There is also the need to consider the possibility of delivering a higher quantum in order to meet unmet needs arising from elsewhere within the HMA, and therefore ensure that there is not an under-supply of housing at the HMA-scale. Guildford Borough has not been formally asked by either of the two other authorities within the HMA to meet unmet needs arising from within their areas; however, it is apparent that there is a risk of unmet needs arising from Woking of 225 dpa over the period 2013/14 – 2026/27 or 3,150 dwellings.

Meeting all of this unmet need through the Guildford Local Plan is arguably ‘unreasonable’ as an option (given numerous factors, including the fact that a rate of delivery three times past rates would be required, and it is arguably reasonable that Waverley should also take a share); however, it is difficult to rule-out this option. As such, the Council determined that it should be taken to be a reasonable option for the purposes of developing alternative spatial strategies. Furthermore, it was recognised as prudent to also test options that would involve delivering a proportion of Woking’s unmet need.

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23 These figures are based on assumptions of completions for 16/17 and 17/18.

24 It is appropriate to assume 625 homes on windfall sites, despite windfall delivery historically having been higher than this. The main reason is that historically, there haven’t been many allocated or identified sites, so most sites coming forward have been windfall. Now that there is an up to date LAA, a lot less windfall is expected.

25 It is appropriate to assume 90 homes on RES, despite RES delivery historically having been higher than this. This is because there will be allocations in some of the larger villages, with affordable housing provided on those sites.

26 The SHMA calculates Woking’s OAN to be 517 dpa, from a base date of 2013/14; however, the adopted Core Strategy makes provision for 292 dpa over the period 2012-2027. As such, there is a shortfall of 225 dpa (517 – 292) over 2013/14 – 2026/27.
Step 2: Consider distribution options

6.3.14 As per the approach proposed in 2013 and applied in 2014, when considering distribution options there is a need to recognise that a hierarchy of places / growth locations 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 at the bottom of the hierarchy.

6.3.15 The need to distribute growth in a sequential fashion, in-line with the established hierarchy of places, is an important consideration when examining the ‘reasonableness’ of a given distribution option. However, there are also other considerations. Notably, there is a need to support sites that:

1. are deliverable, in that homes can be delivered particularly early in the plan period;
2. bring wider benefits through the delivery of strategic infrastructure; and/or
3. bring wider benefits through meeting employment or Traveller accommodation needs.

6.3.16 With these points in mind, the following bullet points consider each of the places / 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. Where a variable is identified, then consideration is given to the options.

- In-line with the sequential approach, there is a need to maximise growth in Guildford Town Centre, which means supporting / allocating land (henceforth ‘supporting’) for 1,172 dwellings, or 57 dpa. Whilst there are additional sites (i.e. discounted LAA sites) that could conceivably be supported in order to deliver a higher number in the Town Centre over the plan period, there is little to suggest the potential to do so sustainably (particularly given flood risk), and so the figure of 57 dpa was identified as a ‘given’ for the purposes of developing spatial strategy alternatives.

- In-line with the sequential approach, the next location at which to maximise growth – i.e. deliver as much of the residual housing as possible - is the wider Guildford urban area. This means supporting 1,570 dwellings, or 79 dpa. Whilst there are additional sites (i.e. discounted LAA sites) that could conceivably be supported in order to deliver a higher number, there is little to suggest the potential to do so sustainably (e.g. given deliverability challenges at SARP), and so the figure of 79 dpa was identified as a ‘given’ for the purposes of developing spatial strategy alternatives.

- In-line with the sequential approach, the next location at which to maximise growth – i.e. deliver as much of the residual housing as possible - is the Ash and Tongham urban area. This means supporting 91 dwellings, or 5 dpa. Whilst there are additional sites (i.e. discounted LAA sites) that could conceivably be supported in order to deliver a higher number, there is little to suggest the potential to do so sustainably (e.g. given that the majority of available sites that would come into contention are either employment land to be retained, or within 400m of the Thames Basing Heaths SPA), and so the figure of 5 dpa was identified as a ‘given’ for the purposes of developing alternatives.

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27 Some of the sites in the Land Availability Assessment (LAA), where development is assumed within the plan period, have a capacity of less than 25 homes, and therefore are not to allocated through the Local Plan.
28 The capacity of the Town Centre will be the focus of further work in the near future, including work that will examine how to mitigate flood risk. At the current time, the ‘sequential test’ suggests the need to avoid development/densification within areas of the Town Centre that are at risk of flooding; however, there will be the potential to revisit these conclusions on the basis of further detailed work.
29 There has been a need to give careful consideration to the quantum of growth that come forward through the Syfield Area Regeneration Project (SARP) in particular. The SARP is a major urban regeneration scheme covering more than 40 hectares of land adjacent to the Syfield Industrial Estate and residential area, towards the northern edge of Guildford. The Thames Water sewage treatment facility and Council depot will be re-provided within the site releasing land for new homes and supporting infrastructure. Feasibility studies have tested a mixture of residential densities ranging from 1,000 units up to 2,250 units, and the current view is that 1,000 dwellings will be delivered during the plan period.
In-line with the sequential approach, the next locations at which to maximise growth – i.e. deliver as much of the residual housing as possible – are locations **within the built up area of villages**. This means supporting 195 dwellings, or 10 dpa. Whilst there are additional sites (i.e. discounted LAA sites) that could conceivably be supported in order to deliver a higher number, there is little to suggest the potential to do so sustainably (recognising the inherent constraints to growth at villages). As such, the figure of 10 dpa was identified as a *given* for the purposes of developing alternatives.

In-line with the sequential approach, the next locations at which to maximise growth – i.e. deliver as much of the residual housing as possible – are locations **within the proposed Green Belt boundaries of villages, but outside the existing settlement boundaries**. This means supporting 246 dwellings, or 12 dpa. The Land Availability Assessment (LAA) lists just eight non-supported (`discounted`) sites, and an examination of these sites identifies little potential for additional growth (also recognising the inherent constraints to growth at villages). As such, the figure of 12 dpa was identified as a *given* for the purposes of developing alternatives.

In-line with the sequential approach, the next locations at which to maximise growth – i.e. deliver as much of the residual housing as possible – are **brownfield sites in the Green Belt**. This means supporting 299 dwellings, or 15 dpa, across 9 sites. The LAA lists just four ‘discounted’ sites, and an examination of these sites identifies little potential for additional growth (recognising that the brownfield status of three of the discounted sites is uncertain, as is the availability of the fourth). As such, the figure of 15 dpa was identified as a *given* for the purposes of developing alternatives.

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

A) **Limited development around Ash and Tongham** (1,235 dwellings or 62 dpa) - would involve leaving land to the south of the urban area undeveloped to reflect: A) its landscape value; and B) infrastructure capacity issues (likely to worsen over the plan period as, due to the lesser degree of protection that CBGB currently affords together with fragmented land ownership, development is already and will continue to be delivered in a piecemeal way with limited associated supporting infrastructure delivery due to the lack of a Community Infrastructure Levy.

B) **Maximise development around Ash and Tongham** (1,835 dwellings, or 92 dpa) - in line with the sequential approach to locating growth.

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30 The Green Belt boundaries were assessed as part of Volume IV of the Green Belt and Countryside Study, which looked at which parts of villages contribute towards openness of GB (as per para 86 of NPPF) and sought to ensure that boundaries are defensible (as per para 85 of NPPF). Whilst the Council has reviewed and ‘tweaked’ findings of the study in limited cases, the Council’s preferred approach is broadly as per the study. Hence there is no need to formally consider alternatives.
• In-line with the sequential approach, the next location at which to maximise growth – i.e. deliver as much of the residual housing as possible – is at Green Belt sites around the edge of the Guildford urban area. However, again there is a question-mark regarding precisely what maximising growth (sustainably) means in practice, given some notable planning issues. Again, it is not ‘a given’ that growth should be maximised, despite the fact that any decision to not allocate would increase pressure on locations lower down the hierarchy. As such, the approach to growth here was identified as a variable, for the purposes of developing spatial strategy alternatives. The options are:

A) 3,940 dwellings, or 197 dpa, at the three sites of Blackwell Farm, Gosden Hill Farm and Keens Lane

B) 4,540 dwellings, or 227 dpa, at the four sites of Blackwell Farm, Gosden Hill Farm, Keens Lane and Liddington Hall.

C) 4,940 dwellings, or 247 dpa, at the four sites of Blackwell Farm, Gosden Hill Farm, Keens Lane and Clandon Golf.

D) 5,540 dwellings, or 277 dpa, at the five sites of Blackwell Farm, Gosden Hill Farm, Keens Lane, Liddington Hall and Clandon Golf.

See further explanation of these options in Box 6.5.
Box 6.5: Green Belt site options around the Guildford urban area

There are five reasonable site options:

- Blackwell Farm to the south-west performs relatively well as a site option when considered in isolation, relative to other strategic site options, as there is the potential to facilitate delivery of new strategic infrastructure (including a rail station) and enable an extension to the Surrey Research Park; and development would mostly avoid the loss of Green Belt identified as most sensitive ('red-rated') by the Green Belt and Countryside Study (GBCS; see Figure 6.4). As such, an urban extension here was identified as a ‘given’ for the purposes of developing spatial strategy alternatives. With regards to site capacity a figure of 1,800 (i.e. a figure lower than that proposed in 2014, reflecting a reduction in the overall site size to avoid red-rated Green Belt and AONB, and minimise development on Area of Great Landscape Value (AGLV)) was identified as a given, for the purposes of developing spatial strategy alternatives.

- Gosden Hill to the north-east also performs relatively well as a site option when considered in isolation, relative to other strategic site options, as there is the potential to facilitate delivery new strategic infrastructure (including a rail station, park and ride and a secondary school) and development would not result in the loss of red-rated Green Belt (see Figure 6.4). The site area is increased from that proposed in 2014 to ensure the planned capacity (2,000 homes) is capable of being delivered at an appropriate density and to enable the delivery of the necessary infrastructure, notably the new school, and so a scheme of this scale was identified as a ‘given’ for the purposes of developing spatial strategy alternatives.

- Land north of Keens Lane, to the north / north west, is a smaller site. A care home would be delivered as part of the scheme, and development here is associated with no major issues (on the assumption that measures are in place to ensure no impact to the nearby Thames Basin Heaths SPA); hence a 140 home scheme here was identified as a ‘given’ for the purposes of developing spatial strategy alternatives.

- Liddington Hall to the north-west performs less well as a site option when considered in isolation. The site comprises red-rated Green Belt (see Figure 6.4), and is also relatively poorly connected. As such, this site was identified as a variable for the purposes of developing spatial strategy alternatives. There is a need to consider the possibility of allocating the site for 600 homes (given the need to minimise development around villages); however, there is also a need to consider the possibility of not allocating.

- Clandon Golf to the south-east performs least well as a site option when considered in isolation. The site comprises red-rated Green Belt (see Figure 6.4), borders the AONB and comprises land designated as being AGLV. The site could deliver employment and a new secondary school; however, a new secondary school at nearby Gosden Hill combined with one at Wissley airfield (discussed below) is the preferable option. As such, as per Liddington Hall, this site was identified as a variable for the purposes of developing spatial strategy alternatives. There is a need to consider the possibility of allocating the site for 1,000 homes; however, there is also a need to consider the possibility of not allocating.

On the basis of the above discussion, a sequential approach emerges - with development at the first three sites broadly supported; and development at the fourth/fifth sites potentially, i.e. supported if necessary/appropriate in order to minimise development around villages. The other principle that emerges from the bullet point discussion is that Clandon Golf would not be allocated ahead of Liddington Hall.

As such, there are four ‘development at Green Belt sites around Guildford’ options:

1) 3,940 dwellings at three sites of Blackwell Farm, Gosden Hill and Keens Lane
2) 4,540 dwellings at four sites of Blackwell Farm, Gosden Hill, Keens Lane and Liddington Hall.
3) 4,940 dwellings at four sites of Blackwell Farm, Gosden Hill, Keens Lane and Clandon Golf.
4) 5,540 dwellings at five sites of Blackwell Farm, Gosden Hill, Keens Lane, Liddington Hall & Clandon Golf.

N.B. Further information on site options (in isolation) is presented in Appendix IV.

31 Red-rated Green Belt land would not be lost to deliver the site itself, but would be lost to deliver an expanded existing access road (plus this land is partly AONB/AGLV, i.e. designated for landscape value).
32 To be clear, originally the proposal was to deliver a larger site, with access via a new junction with the A31 and a substantial new road. More recently, the proposal is to deliver a reduced site, with access achieved by the widening an existing road.
• In-line with the sequential approach, the next location at which to maximise growth is at a new settlement. The Council has supported the option of a new settlement since 2013/14, when the principle was established through consultation. Also, at this time, it was established that Wisley airfield is the only realistic site in contention, recognising the potential to deliver strategic infrastructure including a new school (in an appropriate location). As such, the view of the Council in 2015 and early 2016 was that a new village at Wisley airfield was a ‘given’ for the purposes of developing spatial strategy alternatives. However, in April 2015 the situation changed when a planning application for a new settlement at the site was refused by the GBC Planning Committee (in-line with a recommendation by Development Management Officers). Grounds for refusal were numerous, and potentially call into question the suitability of the site for a new settlement (i.e. it may be the case that some of the issues raised cannot be addressed through policy and ultimately a revised application). As such, the approach to growth here was identified as a variable, for the purposes of developing spatial strategy alternatives. The options are: A) allocate for a 2,100 home new settlement, delivering 105 dpa on average; and B) do not allocate.

• In-line with the sequential approach, the final location at which to deliver growth is at Green Belt sites around the villages. There is feasibly the option of delivering nil growth at these locations; however, this is not a reasonable option as several sites do have merit, despite the inherent draw-backs associated with a village location. The option of delivering the total quantum of growth around villages that was proposed - and strongly objected to - in 2014 can be ruled-out, but it remains the case that significant growth around villages is necessary. Specifically, the following sites are broadly supported and hence were identified as ‘givens’ for the purposes of developing alternatives:

  – Normandy/Flexford - a 1,100 home scheme, whilst resulting in the loss of ‘red rated’ Green Belt (see Figure 6.4), would deliver required facilities, including a secondary school (well located for both Guildford and Ash/Tongham) and a new local centre; ensure good access to public transport; and meet Travelling Showpeople accommodation needs in an appropriate location.34

  – Flexford - a relatively small site for 50 homes is supported on the basis that it is green-rated Green Belt (see Figure 6.4), has good access to a train station and would relate well to the proposed Normandy/Flexford strategic scheme.

  – East and West Horsley (‘the Horsleys’) - four sites (445 homes in total) perform well as they comprise green-rated Green Belt (see Figure 6.4); and are close to the train station and local centre at East Horsley.

  – Send Marsh / Burnt Common - a site for 400 homes, whilst resulting in the loss of amber-rated Green Belt (see Figure 6.4), would deliver new employment floorspace, and also support delivery of A3 junction upgrades.

  – Send - A relatively small site for 40 homes is supported on the basis that it is green-rated Green Belt (see Figure 6.4), is partly owned by the Council and would deliver a Traveller site in an appropriate location.

Also, it is fair to assume that these sites - given their relatively small scale - will be deliverable in the early part of the plan period. This is an important consideration, given that the plan will likely have to put in place a five year land supply at the time of plan adoption, if it is to be found ‘sound’ at examination.

33 This capacity figure is the same as that proposed in the 2014 draft plan, but the site area has been increased since 2014. A larger site area should help to ensure that some of the grounds upon which the recent planning application can be addressed.

34 Normandy/Flexford was a safeguarded site in the 2014 draft plan.
Other sites perform less well, as they comprise amber or red-rated Green Belt (see Figure 6.4) and would not deliver wider benefits; or are within the AONB (applicable to just the two southern-most sites in Figure 6.4). Notably, sites that were proposed allocations in 2014, but which can now be ruled out are: Effingham Lodge Farm, Effingham (red-rated Green Belt); Silkmore Lane at West Horsley (red-rated Green Belt); Tannery Lane, Send (red-rated Green Belt); and New Pond Road, Farncombe (AONB).

However, there is another factor, namely the pressure to allocate sites that are able to deliver early in the plan period (and in particular within the first five years post adoption). In light of this factor there is a need to consider the possibility of allocating additional village sites, and ‘the first place to look’ is at sites that comprise amber-rated Green Belt (see Figure 6.4) and are outside the AONB. Having accepted this principle, three sites at Send (c.600 homes in total) come into contention (two of which were proposed allocations in 2014). These sites come into contention on the basis that there are no other amber rated sites (outside the AONB) that are known to be available/deliverable in the plan period.

As such, the approach to growth here (i.e. at Green Belt sites around the villages) was identified as a variable, for the purposes of developing spatial strategy alternatives. The options are:

A) 2,035 dwellings, or 102 dpa, at the eight sites that are broadly supported;

B) 2,135 dwellings, or 107 dpa, at the eight supported sites, plus the best performing site\(^{35}\) of the three sites at Send; and

C) 2,585 dwellings, or 129 dpa, at the eight supported sites, plus the three sites at Send.

For more information on the performance of site options (in isolation), see Appendix IV.

\(^{35}\) Aldertons Farm (c.100 homes) benefits from being located to the north of the village, away from the A3 (recognising the objective of avoiding continuous development along the A3 and maintaining the gap to Guildford.)
Figure 6.4: Greenfield site options, with those in the Green Belt classified according to sensitivity\(^{36}\)

\(^{36}\) Green Belt sensitivity was examined through the *Green Belt and Countryside Study* in 2013, and then reviewed in 2014 (‘Volume II addendum’) resulting in a district-wide map categorising each Green Belt parcel on a red/amber/green (‘RAG’) scale (red = high sensitivity) - see [www.guildford.gov.uk/media/16835/Appendix-2-Green-Belt-Sensitivity-Map/pdf/Appendix_2_Green_Belt_Sensitivity_Map.pdf](http://www.guildford.gov.uk/media/16835/Appendix-2-Green-Belt-Sensitivity-Map/pdf/Appendix_2_Green_Belt_Sensitivity_Map.pdf)
Step 3: Establish the reasonable alternatives

6.3.17 Having given consideration to the total quantum of land that needs to be allocated and the distribution givens / variables / options discussed above, eight reasonable spatial strategy alternatives emerged – see Tables 6.1 / 6.2 and the subsequent maps.

6.3.18 These were determined to be the ‘reasonable’ alternatives in that their appraisal would enable and facilitate discussion of numerous important issues/opportunities. Whilst it was recognised that there are other options that could potentially feature, there is a need to limit the number of alternatives under consideration, with a view to facilitating engagement.

Box 6.6 considers other (‘unreasonable’) spatial strategy options.

Box 6.6: Unreasonable spatial strategy options

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

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

- Higher and lower growth options. As discussed at para 6.3.10, there is no potential for Guildford Borough to justifiably undersupply, i.e. plan for a level of growth significantly below OAN figure identified through the SHMA (although see Option 1 below, which would likely involve undersupply in practice). As for higher growth options, there is no need to consider a level of growth above ‘OAN plus 34%’, as this is the level of growth that would involve meeting the great majority of (and potentially all) unmet need arising as a result of undersupply in Woking (c. 3,150 homes).

- An option akin to the 2014 preferred option. The Council’s view is that the 2014 preferred option is no longer ‘reasonable’ in light of consultation responses and the latest evidence. It is now understood that it is appropriate to align the plan much more closely with the findings of Green Belt sensitivity analysis, avoid village extensions in the AONB, avoid flood risk and focus to a greater extent on strategic scale schemes that will achieve wider benefits, i.e. deliver strategic infrastructure (schools, transport and community infrastructure).

- Options involving the implementation of ‘phasing’ policy to ensure that some development at strategic sites is delivered beyond the plan period. For example, Wisley Airfield, Blackwell Farm and Gosden Hill might all be allocated, but with policy to ensure that only 50% of the site capacity is built out during the plan period, unless monitoring shows that faster development is necessary to meet OAN or ensure a five year land supply. It would be difficult to meaningfully differentiate the merits of an option that would involve a phasing approach, versus an option that plans to deliver growth at all strategic sites within the plan period.
### Table 6.1: Spatial strategy alternatives (summary)

<table>
<thead>
<tr>
<th>Option</th>
<th>Quantum</th>
<th>Distribution</th>
<th>Further comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>OAN</td>
<td>Low growth option everywhere except at the ‘Send amber sites’, where there is medium growth</td>
<td>Nil buffer would lead to a risk of Guildford’s OAN not being met in practice.</td>
</tr>
<tr>
<td>2</td>
<td>OAN + 3%</td>
<td>Low growth option everywhere except at the ‘Send amber sites’, where there is high growth</td>
<td>Providing for a buffer will help to ensure that Guildford’s OAN is met in practice.</td>
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<tr>
<td>3</td>
<td>OAN + 12%</td>
<td>High growth option everywhere except Wisley Airfield and Clandon Golf</td>
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<tr>
<td>4</td>
<td>OAN + 14%</td>
<td>High growth at Wisley Airfield enables the low growth elsewhere.</td>
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</tr>
<tr>
<td>5</td>
<td>OAN + 18%</td>
<td>As per (4), but with high growth at the Send amber sites.</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>OAN + 27%</td>
<td>High growth at all locations except Clandon Golf</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>OAN + 30%</td>
<td>High growth at all locations except Liddington Hall</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>OAN + 34%</td>
<td>High growth at all locations</td>
<td></td>
</tr>
</tbody>
</table>

37 Alternatively, there is an argument to suggest that Scenario 8 (OAN + 34%) would meet all of Woking’s unmet need. This is on the basis that under this scenario Guildford would not need a 14% (1,940) buffer, as there would be additional small sites delivered.
Table 6.2: Spatial strategy alternatives (N.B. greyed-out rows show the constants)

<table>
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<tr>
<th></th>
<th>Option 1</th>
<th>Option 2</th>
<th>Option 3</th>
<th>Option 4</th>
<th>Option 5</th>
<th>Option 6</th>
<th>Option 7</th>
<th>Option 8</th>
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<tr>
<td>Name</td>
<td>OAN</td>
<td>OAN plus 3% buffer</td>
<td>OAN plus 12% buffer</td>
<td>OAN plus 14% buffer</td>
<td>OAN plus 18% buffer</td>
<td>OAN plus 27% buffer</td>
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<td>40</td>
<td>40</td>
<td>40</td>
<td>40</td>
</tr>
<tr>
<td>Send Marsh (amber rated sites x3)</td>
<td>100</td>
<td>550</td>
<td>550</td>
<td>0</td>
<td>550</td>
<td>550</td>
<td>550</td>
<td>550</td>
</tr>
<tr>
<td>Total</td>
<td>13844</td>
<td>14294</td>
<td>15494</td>
<td>15844</td>
<td>16394</td>
<td>17594</td>
<td>17994</td>
<td>18594</td>
</tr>
<tr>
<td>Variation on OAN (%)</td>
<td>0</td>
<td>3</td>
<td>12</td>
<td>14</td>
<td>18</td>
<td>27</td>
<td>30</td>
<td>34</td>
</tr>
</tbody>
</table>
Option 1 – OAN

[Map showing the greenfield sites to be developed under this option, with Green Belt sites classified according to sensitivity]
Option 2 - OAN + 3%

[Map showing the greenfield sites to be developed under this option, with Green Belt sites classified according to sensitivity]

Legend
- Guildford Borough Boundary
- Countryside Beyond the Green Belt Site
- Green Belt Sensitivity
  - High Sensitivity
  - Medium Sensitivity
  - Low Sensitivity

Scale at A4:
1:125,000

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Option 3 - OAN + 12%

[Map showing the greenfield sites to be developed under this option, with Green Belt sites classified according to sensitivity]

Legend
- Guildford Borough Boundary
- Countryside Beyond the Green Belt Site
- Green Belt Sensitivity
  - High Sensitivity
  - Medium Sensitivity
  - Low Sensitivity

Scale at A4:
1:125,000
Option 4 - OAN + 14%

[Map showing the greenfield sites to be developed under this option, with Green Belt sites classified according to sensitivity]
Option 5 - OAN + 18%

[Map showing the greenfield sites to be developed under this option, with Green Belt sites classified according to sensitivity]
**Option 6 - OAN + 27%**

[Map showing the greenfield sites to be developed under this option, with Green Belt sites classified according to sensitivity]
Option 7 - OAN + 30%

[Map showing the greenfield sites to be developed under this option, with Green Belt sites classified according to sensitivity]
Option 8 - OAN + 34%

[Map showing the greenfield sites to be developed under this option, with Green Belt sites classified according to sensitivity]
APPRAISING REASONABLE ALTERNATIVES

7.1 Introduction

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

7.2 Summary alternatives appraisal findings

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

Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of ‘significant effects’ (using red / amber / green) and also rank the alternatives in order of performance. Also, ‘=’ is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).
### Table 7.1: Summary spatial strategy alternatives appraisal findings

<table>
<thead>
<tr>
<th>Topic</th>
<th>Rank of performance / categorisation of effects</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Option 1 OAN</td>
</tr>
<tr>
<td>Biodiversity</td>
<td>1</td>
</tr>
<tr>
<td>Climate change</td>
<td>8</td>
</tr>
<tr>
<td>Communities</td>
<td>3</td>
</tr>
<tr>
<td>Economy</td>
<td>8</td>
</tr>
<tr>
<td>Employment</td>
<td>6</td>
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<tr>
<td>Flooding</td>
<td>=</td>
</tr>
<tr>
<td>Health</td>
<td>=</td>
</tr>
<tr>
<td>Historic environment</td>
<td>1</td>
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<td>Housing</td>
<td>8</td>
</tr>
<tr>
<td>Land</td>
<td>1</td>
</tr>
<tr>
<td>Landscape</td>
<td>1</td>
</tr>
<tr>
<td>Poverty and social exclusion</td>
<td>=</td>
</tr>
<tr>
<td>Previously developed land</td>
<td>=</td>
</tr>
<tr>
<td>Rural economy</td>
<td>=</td>
</tr>
<tr>
<td>Transport</td>
<td>1</td>
</tr>
<tr>
<td>Water</td>
<td>=</td>
</tr>
</tbody>
</table>
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 the AONB and/or AGLV.
- Transport - Generally, the degree of impact increases in-line with the quantum of growth / number of sites supported, with two exceptions; notably, Option 7 (Clandon Golf) performs better than Option 6 (Liddington Hall). With regard to effect significance, it is difficult to draw strong conclusions in the absence of detailed transport modelling evidence (a new Strategic Transport Assessment is 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.
8 DEVELOPING THE PREFERRED APPROACH

8.1 Introduction

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

8.2 The Council’s outline reasons

8.2.1 The Council’s preferred approach is Option 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.

8.2.2 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 (Merrow), 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 within the plan period. .
PART 2: WHAT ARE SA FINDINGS AT THIS CURRENT STAGE?
INTRODUCTION (TO PART 2)

9.1.1 The aim of this chapter is to present an appraisal of the Draft (‘Proposed Submission’) Plan, as currently published under Regulation 19 of the Local Planning Regulations.

Methodology

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

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

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

Adding structure to the appraisal

9.2.4 Whilst the aim is essentially to present an appraisal of ‘the plan’ under each of the SA objective headings, it is appropriate to also give stand-alone consideration to elements of the draft plan. As such, within the appraisal narratives below, sub-headings are used to ensure that stand-alone consideration is given to two distinct elements of the draft plan, before the discussion under a third sub-heading concludes on the Draft Plan as a whole. Specifically, each narrative below is structured using the following headings:

- Commentary on the spatial strategy (i.e. Policy S2);
- Commentary on other (‘Core’ and ‘Development Management’) policies; and
- Appraisal of the draft plan.

Within these narratives, specific policies are referred to only as necessary (i.e. it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability topic/objective/issue.

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38 The decision was taken to consider ‘economy’ and ‘employment’ jointly, for the purposes of the draft plan appraisal.
39 Environmental Assessment of Plans and Programmes Regulations 2004
10 APPRAISAL OF THE PROPOSED SUBMISSION PLAN

10.1 Introduction

10.1.1 As introduced above, the aim of this chapter is to present an appraisal of the Proposed Submission Plan 'under' the SA framework.

10.1.2 The Local Plan Vision and Key Diagram are presented below (Box 10.1 and Figure 10.1), to give a high level overview of the plan.

Box 10.1: The Local Plan Spatial Vision (abridged)

The Local Plan: strategy and sites makes provision to meet the identified growth needs of the borough in terms of housing, employment and retail and leisure. This is achieved by maintaining the extent and function of the Green Belt in such a way as to protect the existing character of the borough... All new development will be of exemplary design and bring with it the infrastructure and services required to enable future and existing communities to live sustainable lives... Affordable housing will account for approximately 40% of all new housing and provided on all appropriate sites.

The plan provides for the delivery of 13,860 additional homes by 2033. The preferred location for this development is existing brownfield sites. Over 2800 units are proposed in the urban areas... The plan also proposes almost 1200 dwellings on non-strategic sites within and around existing villages, some of which are now inset from the Green Belt, and over 750 dwellings as extensions to existing villages. These dwellings will offer a variety of housing choice in villages and help contribute to supporting local services...

Not all of the borough's development needs can be met within Guildford's urban areas. It is therefore proposed to focus some development on large strategic greenfield sites which brings with it significant infrastructure... and does not compromise the overall character of the Borough. Just under 4000 units will be provided on two urban extensions; one to the north east of the Guildford urban area at Gosden Hill Farm and the other to the south west of Guildford at Blackwell Farm. A new settlement will be created at Wissel containing over 2000 homes and a significant expansion is planned at Normandy and Flexford to provide over 1000 new homes. Further development is also proposed in and around Ash and Tongham on land beyond the Green Belt along with new green belt designated to prevent... merging with... Ash Green.

The delivery of this quantum of residential development will lead to the provision of a significant increase in accessible public open space across the borough. Over 250ha, equivalent to more than 350 football pitches, will be provided in perpetuity for the use of residents and visitors... Areas of high environmental value such as the AONB and SSSIs will be retained and afforded great protection...

Existing high levels of economic prosperity will be maintained and supported through the protection of commercial premises and the provision of additional sites... The primary new site proposed is an extension to the Surrey Research Park. Approximately 11 ha, comprising 35,000 sq m... will be provided within the plan period. The plan also supports the rural economy...

The role of Guildford town centre as the largest retail, service, administrative and commercial centre in Surrey will be maintained and enhanced. The major town centre redevelopment of North Street will include... There will be significant ongoing investment in the public realm specifically designed to enhance the pedestrian experience of using the town centre.

The transport strategy and parking policies will be aligned to encourage visitors to use alternative modes of transport and to seek to reduce car traffic through the town... Existing district and local centres will be protected and major new housing developments will provide appropriate retail, employment and community facilities, including education facilities, as an integral part of the development.

The Infrastructure Schedule accompanying the plan outlines the key infrastructure needed to support the development planned... During the plan period Guildford will experience significant improvements in transport infrastructure including new rail stations at Guildford West (Park Barn) and Guildford East (Merrow), over twenty schemes to address 'hotspots' on the Local Road Network and a new park and ride site at Gosden Hill Farm. A Sustainable Movement Corridor, providing a priority route for buses, pedestrians and cyclists through the Guildford Urban area and serving new communities at Blackwell Farm, Gosden Hill Farm and Slyfield Area Regeneration Project, will be delivered.

The Department for Transport's Road Investment Strategy includes schemes for the A3 Guildford.... The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3...
Figure 10.1: The Local Plan Key Diagram
10.2  Biodiversity

“Conserve and enhance biodiversity and the natural environment”

Commentary on the spatial strategy

10.2.1 The plan provides for the delivery of 13,860 additional homes by 2033, or 693 dwellings per annum, which is a higher level of development than experienced in Guildford borough during the previous Local Plan period. This growth strategy, determined in order to provide for objectively assessed needs (OAN), creates tensions with biodiversity objectives as Guildford is a sensitive location in the national context; however, it is difficult to conclude that the broad strategy performs poorly. This is on the basis that any unmet needs arising from Guildford would have to be met elsewhere locally (within the sub-region), and other areas are also heavily constrained. Furthermore, it is not possible to draw conclusions without giving consideration to the spatial approach to accommodating growth.

10.2.2 Over 2,800 units are proposed in the urban areas, which gives rise to few biodiversity concerns (albeit the Guildford Urban Area is sensitive given the River Wey corridor), but other aspects of the strategy inevitably give rise to the potential for conflict.

10.2.3 Most notably, Wisley Airfield is constrained from a biodiversity perspective – given that parts are adjacent to the SPA and also that the majority is classified as an SNCI – however, there are mitigating factors. There is a commitment to use the northern part of the site (i.e., that part that falls within the 400m SPA buffer) for Suitable Alternative Natural Greenspace (SANG), in order to minimise recreational impacts to the SPA. Also, there is some uncertainty regarding the role that the SNCI plays, in terms of ecological networks locally (as the findings of survey and review work are awaited). It is also noted that site-specific policy will require: “Green corridors and linkages to habitats outside of the site, and the adjoining SANG”.

10.2.4 Other site-specific issues include the following: Blackwell Farm sits within the Wanborough and Normandy Woods and Meadows (WNWM) Biodiversity Opportunity Area (BOA) and borders Broadstreet Common SNCI; Gosden Hill sits within the Clandon to Bookham Parkland BOA and borders two SNCIs (Merrow Lane Woodland; and Cotts Wood); Normandy/Flexford sits within the WNWM BOA and contains ancient woodland; Keens Lane partially intersects the 400m SPA buffer; sites at the Horsleys sit within the Clandon to Bookham Parkland BOA and two border the Lollesworth Wood SNCI; the two sites at Ash Green are within the WNWM BOA, border ancient woodland and in one case borders the Ash Green Wood SNCI; the small site supported to the southeast of Flexford sits within the WNWM BOA and would result in the loss of the Little Flexford SNCI; and the mixed use site at Send Marsh / Burnt Common includes two small patches of ancient woodland, and also a stream that forms part of the River Wey (plus tributaries) BOA.

10.2.5 A range of site-specific mitigation measures are proposed, although it is noted that there is potential for more detail in a number of instances. Notably, it is recommended that, with regards to Policy A47 (Land to east of The Paddocks, Flexford), detail is added to the policy requirement for: “Appropriate mitigation in relation to SNCI designation”; recognising that the majority of the site is designated as an SNCI (albeit, as per the Wisley Airfield SNCI, the SNCI status of this site is currently under review). 41

40 The northern part of the site is an SNCI. The southern part of the site, which is not an SNCI, is that part of the site that has been added since the time of the 2014 consultation. 41 An issue at this site is the likelihood of a water vole population associated with the waterway. If this proves to be the main issue, from a biodiversity perspective, then there is confidence that impacts can be sufficiently avoided/mitigated.
Commentary on other policies

10.2.6 Policy I4 (Green and blue infrastructure) appropriately seeks to target efforts within identified Biodiversity Opportunity Areas (BOAs, which are areas with a concentration of recognised sites of conservation importance), with the policy requiring net gains in biodiversity in the context of the BOA, and its objectives. The policy also deals with open space provision, with supporting text stating that: “Proposals for open space should have regard to the BOA approach and the Open Space, Sports and Recreation Assessment and seek to deliver these spaces within BOA boundaries and where provision is most needed.” From a biodiversity perspective, this approach is to be strongly supported.

10.2.7 Policy P5 (Thames Basin Heaths Special Protection Areas) sets out an approach to the protection of the SPA in-line with the sub-regionally agreed Thames Basin Heaths SPA Delivery Framework. Central to the strategy is a 400m ‘exclusion zone’ and a 5km ‘zone of influence’ within which mitigation measures (SAMM and SANG) will be required. The supporting text explains that ‘the precautionary principle’ has been adopted by the Council, given that the SPA: “makes an important contribution to Guildford borough’s landscape character, provides highly valued habitats, and receives strong protection under UK and European law.”

10.2.8 Other policies with minor positive implications for biodiversity include:
- Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB);
- Policy P3: Countryside - recognising that the countryside around Ash and Tongham provides a green corridor considerable biodiversity and recreation value;
- Policy D1: Making better places;
- Policy D4: Development in urban areas and inset villages; and
- Policy I1: Infrastructure and delivery.

10.2.9 There is an argument to suggest that some other policies - notably E1 (Meeting employment needs), E6 (The leisure and visitor experience), E7 (Guildford Town Centre) and I1 (Infrastructure and delivery) - conflict with biodiversity objectives; however, on close inspection there seems little reason to suggest that policy wording unduly creates conflict. Rather, it seems likely that the application of policies in combination will enable biodiversity considerations to gain an appropriate degree of prominence.

Appraisal of the draft plan as a whole (in terms of biodiversity objectives)

10.2.10 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 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 (SNCIs), and also less risk to the SPA (albeit it is recognised that HRA 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. SNCIs are under review), it is appropriate to predict uncertain effects, and recommend that additional work be undertaken to avoid/mitigate effects.
10.3 Climate change

“Mitigate climate change through reducing emissions of greenhouse gases”

Commentary on the spatial strategy

10.3.1 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.

10.3.2 The potential for new development to incorporate low carbon / renewable energy infrastructure (district heating, in the Guildford context), and achieve high standards of sustainable design/construction, is linked to the scale, mix and density of a scheme, and the potential to deliver district heating is also enhanced where a scheme is located close to a source of heat. The Council has established that district heating options should be explored at: residential only developments of at least 50 dwellings per hectare and/or 300 dwellings; (b) residential only developments of 35 dwellings per hectare or above located near a source of heat (or an existing district heating scheme that can be tapped into); and (c) mixed developments of 50 dwellings or more that include either two or more non-residential uses or a single use that would generate significant heat.

10.3.3 In light of these points, the preferred spatial strategy can be seen to perform well given that:

- Development within Guildford Town Centre and the Guildford Urban Area will capitalise on particular opportunities established by the Guildford Renewable Energy Mapping Study. Specifically, the study identified five ‘heat priority areas’ focused on Central Guildford, the Royal Surrey County Hospital and University of Surrey's Stag Hill Campus and adjacent industrial estates.

- The scale of development at the two major urban extensions to Guildford – Blackwell Farm and Gosden Hill – and at Wisley Airfield gives rise to considerable opportunity (to achieve high standards of sustainable design and construction, and deliver a high quality district heating scheme), albeit there is uncertainty given competing funding priorities. The Blackwell Farm site is located close to a heat priority area; however, it is unlikely to be the case that this results in particular opportunity.

- Similarly, the scale of development at Normandy/Flexford and at the 400 home Send Marsh/Burnt Common scheme (which also benefits from being mixed use) gives rise to opportunity.

10.3.4 Site-specific policy does not identify instances of particular opportunity that should be capitalised upon; however, this is likely to be appropriate given overarching, district-wide policy (see discussion below).

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

Commentary on other policies

10.3.5 Policy D2 (Sustainable design, construction and energy) supports the development of low and zero carbon and decentralised energy. Most notably, the policy specifies that proposals for development within heat priority areas, and all sufficiently large or intensive developments (as defined by the supporting text), must demonstrate that heating and cooling technologies have been selected in accordance with a heating and cooling hierarchy (as defined in policy) unless it can be clearly demonstrated that an alternative approach would be more sustainable. Also, the policy states that a statement submitted as part of development proposals must demonstrate: “the lowest level of carbon emissions (direct and embodied) that is achievable”. This is supplemented by a requirement to achieve a ‘reasonable’ reduction in carbon emissions of at least 15 per cent, judged against a baseline of the relevant Target Emission Rate (TER) set out in the Building Regulations. There is also a requirement for proposals to explore “measures that enable sustainable lifestyles for building occupants wherever opportunities to do so are identified”, with supporting text elaborating on what this might mean in practice.

10.3.6 Other policies with minor positive implications for climate change mitigation include:
- Policy E2: Locations of new employment floorspace - given the support for directing development to Guildford town centre, where a mix of uses (residential and offices) will optimise potential for district heating; and
- Policy I1: Infrastructure and delivery - which references district heating schemes in the supporting text.

10.3.7 There is an argument to suggest that some other policies - notably D1 (Making better places) and D3 (Historic environment) conflict with biodiversity objectives; however, on close inspection there seems little reason to suggest that policy wording unduly creates conflict. Rather, it seems likely that the application of policies in combination will enable climate change mitigation considerations to gain an appropriate degree of prominence.

Appraisal of the draft plan as a whole (in terms of climate change objectives)

10.3.8 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, recognising that climate change mitigation is a global issue.

10.4 Communities

“Create and sustain vibrant communities”

Commentary on the spatial strategy

10.4.1 The proposed growth quantum, determined in order to provide for objectively assessed needs (OAN), creates tensions with community objectives given the valued local environment, an understood issues of traffic congestion and community infrastructure capacity; however, it is difficult to conclude that the broad strategy performs poorly. This is on the basis that any unmet needs arising from Guildford would have to be met elsewhere locally (within the sub-region), and other areas are also heavily constrained. Furthermore, it is not possible to draw conclusions without giving consideration to the spatial approach to accommodating growth.
10.4.2 When examining the merits of the spatial strategy in terms of ‘communities’ there are numerous overlapping issues that might be discussed, but an appropriate matter to focus upon here (recognising that other issues are discussed under ‘Health’, ‘Housing’, ‘Poverty and social exclusion’, ‘Transport’, ‘Safety and security’ and ‘Rural economy’) is the matter of community infrastructure (capacity / access). In this respect, the spatial strategy can be seen to have considerable merit, with strategically important community infrastructure to be delivered through development at –

- Normandy/Flexford (a well located secondary school, to serve the west of the borough; a local centre,\(^44\) necessary as existing village services/facilities have experienced viability issues problems; a care home; travelling showpeople plots; a village green; extensive open space (SANG within c.1km); and strategic enhancements to bus / cycle networks).
- Gosden Hill (a secondary school; a local centre; traveller pitches; extensive open space (SANG); and transport infrastructure that contributes to the Guildford Sustainable Movement Corridor, including a rail station).
- Blackwell Farm (a local centre; traveller pitches; extensive open space (SANG); and transport infrastructure that contributes to the Guildford Sustainable Movement Corridor, helping to facilitate the new rail station, and increasing accessibility to key destinations including the Hospital).

10.4.3 The preferred approach to growth within Guildford Town Centre also has merit in this respect. The quantum of homes proposed is less than in the draft Local Plan (2014), which raises some concerns given the extent to which services/facilities etc. are accessible; however, one of the reasons for reducing the quantum is the objective of maintaining existing services/facilities. For example, Guildford library and adult education centre are no longer allocations as it is not clear that there are suitable relocation options locally.

10.4.4 A 2,100 home Wisley Airfield scheme would support the achievement of certain community infrastructure objectives. In particular, a secondary school at Wisley Airfield would provide for sufficient school capacity for needs arising from the planned development of the site and, in combination with the school at Gosden Hill, provide for the additional educational need arising in the eastern part of the borough. However, Wisley Airfield is relatively distant from a town centre (albeit Ripley District Centre would be c.1km of the edge of the site).

10.4.5 Growth at Ash and Tongham is perhaps less ideal, from a perspective of ensuring easy access to services/facilities. In total, the Ash and Tongham area (including Ash Green) is set to receive 2,057 homes over the plan period, which is a level comparable to Wisley airfield (2,100 homes); however, housing growth at Ash and Tongham will come forward without comparable supporting uses and infrastructure.\(^45\) On one hand this is problematic; however, on the other hand the approach to growth at Ash and Tongham is suitably restrained - with the proposal being to add an area of land to the south of Tongham to the Green Belt rather than maximise growth here, within the Countryside Beyond the Green Belt.

10.4.6 With regards to growth at villages, most notable is the decision to allocate Green Belt land for extensions to the Horsleys (445 homes in total) and Send Marsh / Burnt Common (400 homes). Sites at the Horsleys are broadly supported, from a communities perspective, given proximity to a District Shopping Centre (and a train station, which is something that the other District Shopping Centre at Ripley does not benefit from); however, there is little in the way of strategic ‘communities’ argument for the 400 home scheme at Send Marsh / Burnt Common (albeit the District Shopping Centre at Ripley is a relatively short distance away).

\(^44\) Site specific policy as it stands does not specify particular facilities to be delivered (e.g. GP surgery) within new local centres, but rather specifies the approximate floorspace extent of ‘services’ and ‘community uses’ to be provided for.

\(^45\) Small scale and incremental approach to development means that homes are being delivered here without the other mix of uses and supporting infrastructure that sites of this overall scale would normally deliver. This is particularly due to our current inability to pool contributions until the Council has a Community Infrastructure Levy (CIL) in place. The Council expects that planning applications in this area are likely to continue to come forward ahead of the new Local Plan and accompanying CIL, which will further exacerbate this issue.
10.4.7 Finally, there is a need to note that insetting certain villages from the Green Belt will have communities implications, in that an inset boundary will create some development opportunities where previously they would have been considered inappropriate development in the Green Belt. It is not the case that a policy decision has been taken by the Council (rather, villages were identified for insetting on the basis of national policy and the evidence provided by the Green Belt and Countryside Study), but the Council has responded through policy, in particular ensuring that policy is in place to protect open space and village character, which is known to be important to rural communities. Notably, the plan includes a policy on development in urban areas and inset villages (Policy D4), and a new designation of Open Space (Policy I4), in response to concern that the removal of Green Belt protection will lead to development on land that is of public value.

Commentary on other policies

10.4.8 Policy H1 (Homes for all) sets out to ensure new development provides a mix of housing tenures/types/sizes, with a view to meeting the accommodation needs established by the latest Strategic Housing Market Assessment (SHMA), recognising that “Sufficient housing to meet the needs of the borough’s population will ensure that the borough thrives, with mixed, balanced communities”. See detailed discussion of Policy H1 under ‘Housing’, but from a ‘communities’ perspective it is notable that there is a focus on student housing and houses in multiple occupation (HMOs):

- Whilst students should have a choice of accommodation, this should be balanced with the housing needs of the general population, for example recognising that a concentration of homes leased to students can result in empty properties outside term time and impact on the vitality of an area. Hence, to minimise the pressure on the existing housing stock, policy states that: “We expect 60 per cent of the University of Surrey eligible student population (full time equivalent) to be provided with student bedspaces and accommodation on campus.”

- With regards to HMOs, policy is set to be strengthened through the requirement that proposals to convert a house into an HMO that require planning permission (currently, you do not need planning permission to convert a dwelling house to a HMO for less than six people) must not adversely affect: “the balance of housing types and character of the immediate locality”.

10.4.9 Policy H3 (Rural exception homes) is important from a ‘communities’ perspective, recognising that in many rural Green Belt areas high house prices restrict the potential for resident and newly–forming households, and those working in the parish, to live within and contribute fully to the community. People in this situation will benefit from the policy that allows for affordable housing provided on small sites in rural areas on Green Belt land, as an exception to other planning policies. Importantly, the policy requires that: “the homes are all secured as affordable homes in perpetuity.” Legislation is in place to allow this (through the setting of a ‘planning obligation’), and the policy seeks to respond to the legislation. The provision of rural exception housing is quite a complex matter, and hence the supporting text to the policy covers a range of issues including the role of ‘Local Rural Housing Needs Surveys’.

10.4.10 Policy D1 (Making better places) is prepared in the knowledge that: “Good design will influence how people move around our urban areas, how they interact and how places make people feel.” The policy differentiates between developments over and above a 25 home threshold, and is high-level in the knowledge that: “This policy forms the strategic element with more detailed policy to follow as we form the development control policies.” Despite the high-level nature of the policy, it should have the effect of supporting the creation of inclusive places, with a mix of uses and good ‘accessibility’, in particular through walking or cycling.
10.4.11 Policy I1 (Infrastructure and delivery) seeks to ensure the timely provision of suitable, adequate infrastructure recognising that historically infrastructure provision and upgrading has not always kept pace with the growth of population, and some infrastructure is currently at or near to capacity, or of poor quality. The policy is clear that: "Where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused." The Infrastructure Delivery Plan that supports this Plan focuses on a range of types of infrastructure, including GPs and dental surgeries, hospital and community health care, libraries, cemeteries, and sports facilities.

10.4.12 Policies E7 - E9 (Retail and Service Centres) set out to ensure a hierarchy of retail and service centres, of differing scale and functions, that complement one another and meet the needs of communities. The hierarchy consists of a single town centre in Guildford town, one urban and two rural district centres, and 20 local centres across our towns and villages. Specifically, the policies seek to address the role and function of each centre by controlling its size and mix of uses. Within Guildford town centre suitable uses are defined within two zones - a primary and secondary shopping area - whilst within district centres and local centres just a single zone is defined. Within Guildford town centre, it is policy notably seeks to address the fact that:

- "The cumulative impact of concentrations of restaurants, take-aways, bars and pubs can cause problems for town centre residents... As we are encouraging more people to live in the town centre, we must ensure that new food and drink uses do not harm their amenities."

- "Consumer habits are changing and to be a successful town centre in the future will involve strengthening the retail offer and diversifying to include other town centre uses. The town centre will become more important as a focus for our leisure time, and the enhancement of the riverside, buildings and public spaces between them will contribute to this diversification."

10.4.13 Other policies with minor positive implications for communities include:

- Policy H2: Affordable Homes;
- Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB) - recognising the value that rural communities place in local character and amenity;
- Policy P2: Green Belt;
- Policy P3: Countryside;
- Policy E5: Rural economy;
- Policy E6: The leisure and visitor experience;
- Policy I4: Green and blue infrastructure.

Appraisal of the draft plan as a whole (in terms of communities objectives)

10.4.14 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.
10.5  **Economy and employment**

“Maintain Guildford borough and Guildford town’s competitive economic role” and “Facilitate appropriate employment development opportunities to meet the changing needs of the economy.”

Commentary on the spatial strategy

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

10.5.2  A quantum of land is allocated for employment floorspace in line with findings of the Employment Land Needs Assessment (ELNA). With regards to distribution of offices and research / development, there is a focus on supporting an extension to Surrey Research Park, given a unique opportunity to expand the local knowledge-based economy, which is of regional significance, and recognising that this type of specialist employment cannot be provided elsewhere in the borough; plus floorspace is allocated at the Gosden Hill strategic site (given access to the A3 and sustainable transport) and Wisley Airfield (appropriate given the desire for a mixed use new community). With regards to distribution of industrial and storage development, the proposal is to allocate a new site at Garlick’s Arch, Burnt Common. This site is adjacent to the A3, albeit it is recognised that it does not benefit from being adjacent to an existing industrial estate (e.g. Slyfield Industrial Estate site, where an alternative site is promoted; albeit this site is less accessible to the strategic road network).

Commentary on other policies

10.5.3  Policy E1 (Sustainable employment) establishes the amount of new employment land (‘B class’ land, for offices, research and development and industry/distribution) that must be provided for in order to meet the objectively assessed needs established by ELNA (see discussion above); and also establishes that in order to meet OAN there is a need to protect existing employment land (with a distinction between the approach to ‘Strategic Employment Sites’ and ‘Locally Significant Employment Sites’). Importantly, the policy also aims to: “ensure sustainable employment development patterns, promote smart growth and business competitiveness, and allow for flexibility to cater for the changing needs of the economy.” It is to this end that the existing diversity of employment land is set to be retained, refurbishment of employment floor space (especially office space) is encouraged and new sites are supported in the most commercially attractive locations.

10.5.4  Policy E2 (Location for new employment floorspace) defines a Guildford-specific sequential approach to locating new employment sites. With regards to office development (B1a) and research / development floorspace (B1b) the preferred location is in Guildford town centre; then edge of centre locations within 500m of a public transport interchange (as defined by the policy) then the existing Strategic Employment Sites. With regards to industrial and storage development (B2 and B8), a sequential approach means directing proposals to the strategic industrial sites and the sites identified as suitable in the LAA.

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46 The decision was taken to consider ‘economy’ and ‘employment’ jointly, for the purposes of the draft plan appraisal.
10.5.5 Policy E3 (Maintaining employment capacity and improving employment floorspace) responds to the national policy of permitted development rights, which has resulted in a significant amount of office floorspace being lost, particularly in Guildford town centre (in addition to employment floorspace lost over the years because of the higher land values of residential use). As a result of these losses, and also the projected need for employment floorspace over the plan period, the policy seeks to protect floorspace to accommodate existing and future demand. Notably, for different categories of employment floorspace, the policy establishes the length of ‘active and comprehensive marketing’ that must be undertaken prior to change of use being accepted. A requirement for evidence of two years active marketing is considered to be appropriate on the Strategic Employment Sites, i.e. this should provide sufficient time to test the market and to allow for changes in market conditions. A sliding scale is considered to be appropriate for sites of lesser importance.

10.5.6 Policy E4 (Surrey Research Park) responds to the fact that one of the key successes of the Surrey Research Park has been its focus on knowledge transfer and facilities to support the commercial application of the University’s research. The policy aims to support the Research Park to retain its focus - i.e. seeks to restrict employment uses not in line with the current focus - recognising the potential to contribute to the regional economy.

10.5.7 Policy E6 (The leisure and visitor experience) reflects the fact that, despite the borough’s unique attributes and the current high value of leisure/tourism to the local economy, there is scope for improvement in the scale and quality of the offer, particularly in Guildford town centre). There is a need for a dedicated policy that is supportive of growth, but equally recognises that there are particular sensitivities to be accounted for. Notably, the policy references the need for rural tourism and leisure developments to respect their local context; and whilst there is not the same ‘balance’ promoted in respect of the River Wey (with the policy simply supporting “proposals which promote greater use of the River Wey as a leisure and recreational resource”) it is noted the River Wey is afforded protection under Policy I4 (Green and blue infrastructure).

10.5.8 Policy H1 (Homes for all) sets out to ensure new development provides a mix of housing tenures/types/sizes, appropriate to the site size, characteristics and location, with a view to meeting the accommodation needs established by the latest Strategic Housing Market Assessment (SHMA). As well as the benefits it can provide to people’s lives, families and communities, suitably sized, priced and located housing can also help to support the economy by ensuring people with a wide variety of occupations can live in the borough.

10.5.9 Other policies with minor positive implications for the economy/employment include:

- Policies E7 - E9 (Retail and Service Centres);
- Policy H2: Affordable Homes;
- Policy D2: Sustainable design, construction and energy - given employment generation;
- Policy I1: Infrastructure and delivery - recognising that traffic congestion is a problem; and
- Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”.

10.5.10 There is an argument to suggest that a range of other policies conflict with economy/employment objectives; however, on close inspection there seems little reason to suggest that policy wording unduly creates conflict. Rather, it is likely that applying policies in combination will enable economy considerations to gain an appropriate degree of prominence.

10.5.11 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.

Appraisal of the draft plan as a whole (in terms of employment/economy objectives)
10.6 Flooding

"Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment"

Commentary on the spatial strategy

10.6.1 Flood risk is a considerable constraint to growth, as established through Strategic Flood Risk Assessment (SFRA), and this constraint is reflected in the spatial strategy, as evidenced by the number of sites proposed for allocation in the draft Local Plan (2014) that are now not proposed for allocation. Most notably, the quantum of homes now proposed in Guildford town centre is less than in the draft Local Plan (2014). This is following a re-appraisal of sites close to the River Wey, particularly in the Walnut Tree Close area. Close examination has established that sites do not pass the ‘sequential test’, in that there are reasonably available appropriate alternative sites at less risk of flooding.

10.6.2 Whilst flood risk has been applied as a constraint to growth, with a sequential approach taken, the plan does not avoid areas of flood risk entirely. Specifically, having applied the sequential test, the conclusion is reached that two non-residential site allocations within Guildford Town Centre (policies A2 and A9) are appropriate despite being located predominantly in flood zone 3b (developed functional flood plain). This is appropriate, given the non-residential uses proposed, given that these town centre sites are particularly suited to these uses (a cinema in the case of A2, and offices in the case of A9) and given that site-specific policy is set to require a range of measures including “flood risk betterment… hav[ing] regard to the recommendations of the Level 2 SFRA.”

10.6.3 Policy A6 (North Street, Guildford) is also of note as there is a degree of lesser flood risk, and the site is proposed as a retail-led scheme with some residential. In this case, the proposed allocation is appropriate given that retail development is needed and is suited to a town centre location, and given that residential uses can be directed to the part of the site at least risk, with policy stating: “Avoid development of high or medium vulnerability uses in flood zone 2 (medium risk) and flood zone 3 (high risk).”

10.6.4 Other sites intersect the flood risk zone, but there is an expectation that vulnerable development, if not all development, can avoid the flood risk zone (i.e. the flood risk zone can be retained as open space, or indeed used for flood attenuation measures). For example (and notably) Land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (Policy A43) is bisected by a stream, but policy will require that: “Avoid development in flood zones 2 and 3; No increase in flood risk on site or elsewhere.”

10.6.5 Finally, it is noted that numerous sites are at risk of surface water flood risk, and where this is the case policy will require: “Appropriate surface water flooding mitigation measures, with specific regard to the Guildford Surface Water Management Plan and Level 2 SFRA.”

Commentary on other policies

10.6.6 Policy P4 (Flood risk) seeks to avoid vulnerable development in flood risk zones, in-line with national policy, and also states that: “All development proposals will be required to demonstrate that they will not result in an increase in surface water run-off and should have regard to appropriate mitigation measures identified in the Guildford Surface Water Management Plan or Ash Surface Water Study [e.g. Sustainable Drainage Systems, SuDS]."
Policy E7 (Guildford Town Centre) sets out a positive vision for the town centre, recognising that consumer habits are changing and to be a successful town centre in the future will involve strengthening the retail offer and diversifying to include other town centre uses. The town centre will become more important as a focus for our leisure time, and the enhancement of the riverside, buildings and public spaces between them will contribute to this diversification. This creates some tensions with flood risk objectives; however, it is anticipated that this can be managed. Council work continues in partnership with the Environment Agency (in association with the Town Centre master plan), to consider flood risk alleviation schemes for the town centre, and flooding solutions for specific sites; and it is understood that, should a scheme be delivered, allocations could be made through an Area Action Plan or a partial review of the Local Plan. It is recommended that there is a clear policy commitment to such a measure, recognising the importance of maximising growth in the town centre.

Appraisal of the draft plan as a whole (in terms of flood risk objectives)

The spatial strategy reflects a sequential approach to avoiding flood risk wherever possible. Three sites in Guildford TC 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 to the baseline. Whilst the absence of a plan 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.

Health

“Facilitate improved health and well-being of the population, including enabling people to stay independent and reducing inequalities in health”

Commentary on the spatial strategy

The sustainability objective here overlaps considerably with a number of other sustainability objectives including those relating to ‘Communities’, ‘Housing’, ‘Poverty and social exclusion’ and ‘Transport’. Given the need to avoid overlap and repetition, it is appropriate to focus on a number of specific issues -

- Access to a GP surgery – All of the proposed allocations would enable access to a GP surgery, and there is little potential to conclude on the ability of surgeries to accept additional patients or expand. The proposed allocation at Send Marsh / Burnt Common (400 homes) potentially stands out as being some distance from a GP surgery, although it is noted that the GP surgery at Send is located midway between Send and Send Marsh/Burnt Common. With regards to Wisley Airfield, there is a strong commitment to deliver a new GP surgery as part of the scheme (as evidenced by the recent planning application, and more recent discussion with the developers), and residents would also be within c.3 - 3.5km of a GP surgery at East Horsley (understood to have capacity to expand). It is recommended that the site-specific policy (which currently references a need for 550 sq m services in a new Local Centre) is modified to explicitly require a GP surgery.

- Royal Surrey County Hospital - will potentially benefit from the Blackwell Farm development given much needed new housing, including affordable housing, in close proximity to the hospital; and given that the development will contribute towards the delivery of the new Guildford West (Park Barn) railway station which should enhance accessibility to the hospital. However, there are equally some concerns regarding traffic congestion.

- Health deprivation – The Index of Multiple Deprivation (IMD) ‘Health and Disability’ domain dataset shows there to be some notable concentrations of relatively poor health, particularly to the west (Westborough / Park Barn) and north (Bellfields / Slyfield) of the Guildford Urban Area. With regards to Westborough / Park Barn, the Blackwell Farm extension being to the southwest may have some bearing, given that Guildford West (Park Barn) station will benefit the local area. Also, it is noted that Policy A20 (Former Pond Meadow School, Pond Meadow) allocates a site in Park Barn for a new community hub. With regards to Bellfields /
Slyfield it may be that the Slyfield Area Regeneration Project (SARP) will lead to some benefits. The 1,000 home scheme will deliver some new employment and community uses, and improve the local environment with increased access to the river; plus the following policy requirement is noted: “Developer to provide the northern route section of the Sustainable Movement Corridor on the site and make a necessary and proportionate contribution to delivering the northern route section on the Local Road Network.” It is recommended that policy more explicitly addresses regeneration issues.

- **Active travel** – The spatial strategy performs well, e.g. on the basis that there is a good degree of development directed to the Guildford Urban Area, where there will be good potential for residents to walk/cycle to key destinations. Wisley Airfield stands out as a more isolated location; however, residents would benefit from particularly good access to high quality countryside and open space in the form of SANG (as its proximity to the SPA means that it must deliver enhanced SANG). Whilst not all strategic allocations will deliver SANG on-site, all SANG will be nearby (and therefore accessible).

- **Air quality** – There are no designated air quality management areas (AQMAs) within Guildford Borough, and whilst there are recognised air quality issues at Guildford Town Centre and Wisley, it is not possible to conclude that negative impacts will result from growth. A recent report\(^47\) shows NO\(_2\) concentrations at Wisley to be above statutory limits and to have been increasing at a faster rate than at any of the other 14 monitoring locations within the borough (see figure on page 3 of the report). As such, there is a need to consider the possibility that a development at Wisley Airfield would result in sensitive receptors (particularly school children, recognising the proposal to deliver a secondary school) within an air pollution hotspot. However, it is not possible to draw strong conclusions without further investigation. A relatively small part of the site will be adjacent to the A3 (only the western extent, recognising that the northern part of the site must provide SANG), and even here it is fair to assume that there will be a landscape buffer that acts to ensure that residents (a school in this location being highly unlikely) are not at risk. Air pollution decreases quite rapidly away from the source.\(^48\)

**Commentary on other policies**

10.7.2 Policy I3 (Sustainable transport for new developments) seeks to complement the spatial strategy, by promoting the use of sustainable transport modes and improvements to the transport network that will mitigate development. The policy refers to a range of measures, and the supporting text helpfully summarises that: “Measures designed to encourage people to make sustainable travel choices... can include car clubs, car sharing, infrastructure / facilities for electric charging plug-in points and other ultra-low emission vehicles, encouraging the accelerated uptake of cleaner fuels and technologies resulting in carbon and vehicle emission reductions, the provision of cycle infrastructure, pedestrian wayfinding and cycle parking, including for adult tricycles which can be suitable for those with disabilities and older people concerned about their balance, and the marketing and promotion of sustainable travel choices, for instance the provision of resident travel information packs. Well-designed developments may actively help to enhance air quality, manage exposure and reduce overall emissions, therefore reducing possible health impacts.”

10.7.3 Policies E7 - E9 (Retail and Service Centres) requires that: “Proposals for new food takeaways within 500m of schools will not be accepted because of the potential negative impact on the health of school children.”


\(^{48}\) A review of the extent of designated air quality management areas elsewhere – see [www.uk-air.defra.gov.uk/AGMA/maps](http://www.uk-air.defra.gov.uk/AGMA/maps) - potentially serves to indicate the rate at which air pollution decreases away from the source. For example, at Addlestone, where the M25 passes through a residential area, the AQMA extends c.50 either side of the motorway (albeit mitigation measures are likely in place).
10.7.4 Other policies with minor positive implications for the health include:

- Policy H1: Homes for all;
- Policy D1: Making better places;
- Policy I1: Infrastructure and delivery; and
- Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”.

10.7.5 There is an argument to suggest that some other policies - e.g. Policy D2 (Sustainable design, construction and energy), recognising that combined heat and power generation (CHP) can give rise to localised air pollution - conflict with health objectives; however, on close inspection there seems little reason to suggest that policy wording unduly creates conflict. Rather, it seems likely that the application of policies in combination will enable health considerations to gain an appropriate degree of prominence.

Appraisal of the draft plan as a whole (in terms of health objectives)

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

10.8 Historic environment

“Protect, enhance, and where appropriate make accessible, the archaeological and historic environments and cultural assets of Guildford, for the benefit of residents and visitors”

Commentary on the spatial strategy

10.8.1 A primary consideration is the need to avoid impacts to: listed buildings and their setting; conservation areas (within which there will typically be a concentration of listed buildings). Guildford has over 1,000 statutory listed buildings (as well as over 200 locally listed buildings), 40 conservation areas, eight historic parks and gardens (as well as 52 locally important parks and gardens) and 24 scheduled ancient monuments.

10.8.2 It is not clear that the spatial strategy will result in a risk of direct impacts to the setting of a Conservation Area. Of course, there are sensitivities within Guildford Town Centre, but site-specific policy is set to be put in place to ensure sympathetic design. Within the wider Urban Area, Policy A15 (Land at Guildford Cathedral, Alresford Road) is notable, given proximity to the Grade II* listed cathedral. Here, policy is set to require that development “Retain[s] strategically important views of the Cathedral and its setting across the town” and is “Sensitive to the setting of the [building].”

10.8.3 A notable concern relates to the Wisley Airfield site (2,100 homes), which abuts the northern extent of the Ockham Conservation Area (although it is noted that there is only one listed building in this part of the conservation area; grade II listed) and is close to a stand-alone listed building at Martyr's Green, to the southeast. There should be good potential to mitigate impacts, although it is noted that policy currently only goes as far as to require: “Sensitive design at site boundaries that has significant regard to the transition from village to greenfield.” It is recommended that site-specific policy, in respect of layout, is strengthened.
Another important consideration is the potential for increased traffic to impact on historic character within Conservation Areas; however, it is difficult to draw strong conclusions in the absence of detailed modelling work. One issue is likely to be an increase in traffic through the Ripley Green and Ockham Conservation Areas (the former being associated with a high concentration of listed buildings) as a result of the Wisley Airfield scheme. Also, the two conservation areas at the Horsleys, despite being located some distance from proposed housing development sites, could be impacted by increased traffic.

Commentary on other policies

Policy D3 (Historic environment) is a high-level policy in-line with the NPPF requirement to provide a positive strategy for the conservation and enjoyment of the historic environment. The intention is to further develop the strategy towards the conservation of the historic environment in the Local Plan: Development Management Policies document. The supporting text identifies issues that might be addressed through policy, but which are not an explicit focus of the current proposed high level policy, including the need to support “heritage-led regeneration” recognising that: “Conservation can play a key part in promoting economic prosperity by ensuring that an area offers an attractive living and working environment that will encourage inward investment.”

Policy E6 (The leisure and visitor experience) sets out to “increase the contribution that tourism, arts, cultural heritage and sport make to our quality of life and social and cultural well-being” and states that: “All new and enhanced leisure and visitor attractions and facilities should preserve the borough’s special heritage and natural features.”

Policy D1 (Making better places) requires all development to “respond meaningfully and sensitively to the site, its characteristics and constraints… be laid out to make the best use of the natural features… promote and reinforce local… [and] use art and materials of a nature appropriate to their setting.”

Policy D4 (Development in urban areas and inset villages) deals specifically with the areas where, in addition to the site allocations, it is anticipated that a range of other development sites will continue to come forward through redevelopment, infilling or conversions (whether sites identified in the LAA, or sites that will unexpectedly come forward). Notably, policy requires that: “proposals for new development within inset village areas will have particular regard to: the distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape; important views of the village from the surrounding landscape; [and] views within the village of local landmarks.”

There is an argument to suggest that some other policies - e.g. Policy E7 (Guildford Town Centre) - conflict with historic environment objectives; however, on close inspection there seems little reason to suggest that policy wording unduly creates conflict. Rather, it seems likely that the application of policies in combination will enable historic environment considerations to gain an appropriate degree of prominence.

Appraisal of the draft plan as a whole (in terms of historic environment objectives)

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.
10.9 Housing

“Provide sufficient housing of a suitable mix taking into account local housing need, affordability, deliverability, the needs of the economy, and travel patterns”

Commentary on the spatial strategy

10.9.1 In line with para. 47 of the National Planning Policy Framework (NPPF), local planning authorities should: “use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with [principles of sustainable development].” As such, a Strategic Housing Market Assessment (SHMA) study was completed for the housing market area (HMA), which comprises the three West Surrey authorities of Guildford, Woking and Waverley.

10.9.2 The SHMA established an objectively assessed housing need (OAN) figure for the HMA, and was also able to go a step further by establishing an OAN figure for each of the three component local authorities. The OAN figure is primarily a reflection of demographic projections, with upward adjustments made in order to deliver: economic growth (recognising limited capacity to support in-commuting); improved affordability; and student housing.

10.9.3 In light of these points, the preferred broad strategy performs well as allocating enough land to deliver above OAN in theory (i.e. allocating land to deliver OAN plus a buffer) should ensure that OAN is achieved in practice, recognising a necessarily high reliance on large (‘strategic’) sites results in a risk that one or more sites will deliver slower than anticipated (or, indeed, not deliver at all in the plan period).

10.9.4 Another consideration is the trajectory of housing delivery, and in particular ensuring that sites are in place that will deliver in the early part of the plan period (such that there is a ‘five year land supply’ at the time of plan adoption). In this respect, the preferred approach also performs well (in that there is a reliance on smaller sites at villages partly because these sites are ‘deliverable’), albeit there remains some risk of a dip in the housing trajectory in the early part of the plan period, given a reliance on strategic sites. This phased approach is reflected in the trajectory which starts lower and increases as the strategic sites begin to deliver in line with planned infrastructure improvements.

10.9.5 With regards to the spatial strategy / distribution, there is limited potential to draw strong conclusions. A focus on strategic sites is to be supported from a perspective of ensuring a good mix of housing types and tenures; however, the fact that development viability is high across Guildford Borough means that this is less of a factor. One other issue relates to housing development near to the university, where there is high demand for purpose built student accommodation. The Council has decided to resist this demand, most notably along Walnut Tree Close, where the Council considers that the priority is for normal (use class C3) housing (260 homes across three sites), which does not preclude student occupation.

10.9.6 With regards to site-specific policy, there is a requirement for the strategic scale schemes to including “some specialist housing and self-build plots” and in certain instances there are also additional specific requirements. Specifically, at Wisley Airfield there is a requirement for “Approximately 100 sheltered/Extra Care homes (C3 use)”; at Normandy/Flexford there is a requirement for “A nursing or residential care home (C2) with approximately 60 beds”; and at Keens Lane there is a requirement for “a care home (C2)”. Also, site-specific policy specifies the number of Gypsy and Traveller pitches that must be delivered, and in this way the plan meets accommodation identified needs.
Commentary on other policies

10.9.8 Policy H1 (Homes for all) addresses issues under a number of sub-headings. Under four of these sub-headings quite specific requirements are established:

- Specialist housing - “We will support the provision of well-designed specialist forms of accommodation in appropriate sustainable locations, taking into account local housing needs.”

- Students - “We expect 60 per cent of the University of Surrey eligible student population (full time equivalent) to be provided with student bedspaces and accommodation on campus.”

- Houses in multiple occupation - “Proposals for houses in multiple occupation that require planning permission will be supported only where the balance of housing types and character of the immediate locality would not be adversely affected and there is sufficient amenity space available.”

- Travellers - A number of locational criteria presented. Notably, the supporting text explains that: “We require traveller accommodation within development sites of 500 homes or more to help create sustainable, mixed communities with suitable housing for all.”

10.9.9 However, requirements under the heading of ‘Housing mix’ requirements are less clear. Whilst the aim is clear, a lack of detail could potentially create a risk of aims not being realised. The supporting text goes into detail regarding the full range of housing needs, but this detail is somewhat absent from the policy. Furthermore, the policy might benefit from reference to monitoring data (i.e. data demonstrating what aspects of need identified through the SHMA have and have not been met, ideally within particular localities rather than borough-wide). It is recommended that the policy be supplemented in-line with these points.

10.9.10 The policy also has a focus on housing density; however, it is recommended that policy requirements relating to density be moved to another location within the plan, as the link to ‘homes for all’ is not clear and there is a need to avoid diluting other important policy messages.

10.9.11 Policy H2 (Affordable homes) establishes that affordable homes should be provided: on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes; and at least 40 per cent of the homes on these sites must be affordable homes. Land values and property prices are generally high across the borough, and viability evidence shows that the vast majority of developments in most locations in the borough are viable providing an affordable housing contribution of 40 per cent. Where developers demonstrate that providing the amount of affordable housing required by policy would not be economically viable, the Council will follow the following cascade mechanism to assist with delivering a scheme: 1) vary the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; 2) reduce the overall number of affordable homes. In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost; and developments that seek to avoid the requirements of policy by failing to make most efficient use of land or by artificially subdividing land into smaller sites will not be permitted.
Appraisal of the draft plan as a whole (in terms of housing objectives)

10.9.12 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 (emanating 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.

10.10 Land

“Minimise the use of best and most versatile (BMV) agricultural land and encourage the remediation of contaminated land”

Commentary on the spatial strategy

10.10.1 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, it is important to be clear that this data-set is of a very low resolution (e.g. some relatively large villages are not even recognised as ‘urban’ on the map), and hence is not suitable for differentiating sites / site-specific alternatives at the borough-scale. Also, the dataset does not distinguish between ‘grade 3a’ and ‘grade 3b’, which is a notable omission given that the NPPF classifies ‘best and most versatile’ (BMV) agricultural land as that which is either grade 1, grade 2 or grade 3a.

10.10.2 The most reliable dataset is the ‘Post 1988 Agricultural Land Classification (England) dataset, also available at magic.gov.uk, which is suitable for differentiating sites at the borough-scale, and does distinguish between grade 3a and grade 3. However, because surveying land using the ‘post 1988’ criteria involves fieldwork, the data is very patchy. Within Guildford Borough the main area of land that has been surveyed is to the west of Guildford (including Blackwell Farm), finding primarily grade 3b and limited grade 3a and grade 2.

10.10.3 Also, there is the potential to undertake desk-top survey of specific sites, thereby reaching a conclusion on agricultural land quality (distinguishing between grade 3a and 3b), but without the certainty that comes from field survey. The Council has commissioned such a desk-top study of all major greenfield sites.

10.10.4 The spatial strategy will result in significant loss of grade 3a land (i.e. BMV land), but very limited loss of higher quality grade 2 land and seemingly nil loss of grade 1 land. However, it is noted that a number of sites will avoid BMV, notably: Blackwell Farm predominantly is grade 3b; land around Ash and Tongham is predominantly grade 3b, with smaller areas of grade 3a and 2; and the Normandy/Flexford strategic site is seemingly a mix of 3a and 3b, possibly with some grade 4. Also, whilst the Wisley Airfield includes significant agricultural land that is primarily 3a and 3b, the site also includes c.30ha of hard-standing.

Commentary on other policies

10.10.5 There is no potential to mitigate the loss of agricultural land, and hence it is unsurprising that this matter is not addressed through policy. It is also noted that ground contamination is not addressed through policy, although this is again unsurprising given the strategic focus of policies within the current plan.
Appraisal of the draft plan as a whole (in terms of land objectives)

10.10.6 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.

10.11 Landscape

“Conserve and enhance landscape character”.

Commentary on the spatial strategy

10.11.1 Landscape is a considerable constraint to growth in Guildford Borough, 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).49 Also, there is land adjacent to the AONB that is currently designated as an Area of Great Landscape Value (AGLV), and which is also a significant constraint (particularly given a commitment by Natural England to undertake an AONB boundary review, and given an independent study that has identified candidate sites within Guildford to add to the AONB). Furthermore, it is recognised that all landscapes within Guildford will have an identified character, with varying degrees of importance and sensitivity.

10.11.2 The first point to note is that the spatial strategy will impact upon AGLV and AONB (Blackwell Farm), and result in the loss of red-rated Green Belt (Normandy/Flexford); however, efforts have been made to limit impacts as far as possible. Notably, the extent of Blackwell Farm has been reduced since the 2014 Draft Plan proposal, in that the site now only intersects the AGLV to a very small extent (albeit development will necessitate widening of an access road through AGLV and AONB). Also, the decision has been taken not to maximise growth around Ash and Tongham and around the Guildford Urban Area (Clandon Golf), despite these being sustainable locations in certain respects (with Ash and Tongham being within the Countryside Beyond the Green Belt, CBGB), partly because of a desire to conserve AGLV and the setting of the AONB.

10.11.3 With regards to Green Belt, the point to note is that greater weight is now being applied to sensitivity than was the case in 2014, and it is only because Normandy/Flexford presents an exceptional circumstance that allocation is proposed here on a red-rated site. Perhaps most notably, the decision has been taken not to allocate Liddington Hall as an extension to the Guildford Urban Area, largely because it is sensitive (red-rated) Green Belt (and equally Clandon Golf is red-rated Green Belt, albeit it is also constrained by its AGLV designation).

49 The Green Belt and Countryside Study (GBCS) assesses all Green Belt and countryside land beyond the Green Belt and identifies potential development areas (PDAs) that could potentially be developed without harming the main purposes of the Green Belt. The study consists of a number of volumes, but most relevant are: Volume II (and addendum), which identifies PDAs around the urban areas; Volume III, which identifies small-scale PDAs around the villages; and Volume V, which identifies major PDAs around villages, a potential new settlement at Wisley airfield and reconsiders Countryside beyond the Green Belt. The draft Local Plan (2014) treated all PDAs as reasonable options for development regardless of the extent to which the land parcel within which it sits scored against Green Belt purposes. However, following the feedback from consultation, the Council determined the need to give weight to the sensitivity of the Green Belt parcel within which each PDA is located. Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt.
10.11.4 The proposed approach to growth around Ash and Tongham is also heavily influenced by the desire to retain the separate identity of Ash Green, i.e. prevent the village merging into the Ash and Tongham Urban Area. A carefully targeted approach is set to be followed, which involves adding some land to the Green Belt (despite not all of the land having been assessed as contributing fully to Green Belt purposes). It is also the case that the major development allocation (Policy A29: Land to the south and east of Ash and Tongham) includes detailed policy to ensure that landscape/character objectives are realised: “Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, proposals for the land west of this road should respect the historical context of this area. This should include the provision of a green buffer that seeks to maintain a sense of separation between the proposed new development and the properties fronting onto Ash Green Road…”

10.11.5 The other important step that has been taken is to revaluate villages and previously developed sites that are currently washed over by the Green Belt, insetting them from the Green Belt where they do not make an important contribution to the openness of the Green Belt (in-line with national policy). Focusing on major previously developed sites to be inset from the Green Belt, whilst a number are set to be inset the majority are not proposed to be redeveloped for housing. Instead, the process of insetting will merely enable greater flexibility for appropriate intensification or development for the uses that already exist on site. One site that is proposed to be inset and redeveloped for housing is the Surrey Police Headquarters at Mount Browne, which is particularly sensitive given its location within the AONB. In this instance, site-specific policy will require “positive benefit in terms of landscape and townscape character and local distinctiveness.” Similarly, the University of Law site is sensitive on account of its location within the AONB and its elevation, albeit it is a small site at 0.7 ha. In this instance, the site is understood to be screened by vegetation, and policy will require: “Significant regard to height of buildings (buildings higher than two storeys are unlikely to be suitable).”

Commentary on other policies

10.11.6 Policy P1 (Surrey Hills Area of Outstanding Natural Beauty) seeks to conserve the AONB, in-line with national policy. It also deals with the Area of Great Landscape Value (AGLV), which predominantly abuts the AONB, stating that: “Proposals within the AGLV will be required to demonstrate that they would not result in harm to the AONB or the distinctive character of the AGLV itself.” Whilst there is a policy presumption against major development, the supporting text explains that the AONB is a “living landscape, which constantly changes across seasons and in response to the many social and economic forces placed upon it.”

10.11.7 Policy P2 (Green Belt) clarifies national policy in respect of protecting the Metropolitan Green Belt. Importantly, the policy clarifies those villages for which it has been possible, given built form, to establish a settlement boundary within which limited infilling would be appropriate (in-line with national policy). Within villages with no settlement boundary, which are listed, applications for limited infilling will need to be considered on a case-by-case basis, i.e. a judgement on the ground will need to be made regarding whether the site in question is within the village. The supporting text goes on to state that: “For the purposes of this policy, limited infilling is considered to be the development of a small gap in an otherwise continuous built-up frontage, or the small-scale redevelopment of existing properties within such a frontage. It also includes infilling of small gaps within built development. It should be appropriate to the scale of the locality and not have an adverse impact on the character of the countryside....”
10.11.8 Policy P3 (Countryside) deals specifically with the countryside near Ash and Tongham, recognising that, whilst its position outside the Green Belt means that it is a sequentially preferable location for growth in policy terms, there is a need to: “protect its intrinsic character and preserve... the separate identities of Ash and Tongham”; and also recognise that: “This area of countryside provides a green corridor and tranquil setting with considerable biodiversity and recreation value. The River Blackwater marks the borough and county boundary and maintains the rural corridor between Surrey and Hampshire.” Most notably, the policy requires that any proposal: “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot.”

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

Appraisal of the draft plan as a whole (in terms of landscape objectives)

10.11.10 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.
10.12 Poverty and social exclusion

“Reduce poverty and social exclusion for all sectors of the community”

Commentary on the spatial strategy

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

With regards to Westborough / Park Barn, the Blackwell Farm extension being to the southwest may have some bearing, given that Guildford West (Park Barn) station will benefit the local area. Also, it is noted that Policy A20 (Former Pond Meadow School, Pond Meadow) allocates a site in Park Barn for a new community hub. With regards to Bellfields / Slyfield it may be that the Slyfield Area Regeneration Project (SARP) will lead to some benefits. The 1,000 home scheme will deliver some new employment and community uses, and improve the local environment with increased access to the river; plus the following policy requirement is noted: “Developer to provide the northern route section of the Sustainable Movement Corridor on the site and make a necessary and proportionate contribution to delivering the northern route section on the Local Road Network.” It is recommended that policy more explicitly addresses regeneration issues.

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

Commentary on other policies

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

Appraisal of the draft plan as a whole (in terms of poverty and social exclusion objectives)

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

10.13 Previously developed land

“Make the best use of previously developed land and existing buildings”

Commentary on the spatial strategy

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

10.13.2 Policy H1 (Homes for all) deals with density, stating that: “New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre.”

Appraisal of the draft plan as a whole (in terms of previously developed land objectives)

10.13.3 As discussed above…

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.

10.14 Rural economy

“Enhance the borough’s rural economy”

Commentary on the spatial strategy

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

Commentary on other policies

10.14.2 Policy E5 (Rural economy) aims to encourage rural enterprise, to the extent to which this is possible through the planning system. As stated in the supporting text, there is a need to: “where feasible, contribute to projects promoted by the Surrey Countryside Rural Economic Forum and the Surrey Hills Board… work with our partners the Guildford Business Forum Rural Group… support rural and agricultural initiatives that improve local services and facilities and contribute to the rural economy… [and] balance the creation of new business opportunities with the needs of the farming industry.” However, it is not clear that this careful ‘balancing act’ is reflected in the policy itself. It is recommended that the policy be reviewed to ensure that it is not overly supportive of development and activities that could conflict with more traditional rural uses, most notably farming.

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

10.14.4 Perhaps the most notable effects will arise as a result of Policy E5 (Rural economy), which aims to encourage rural enterprise, to the extent to which it is possible through the planning system. It is not clear that the spatial strategy will have notable effects, although it is noted that Wisley Airfield (proposed 2,100 home mixed use development) is in a relatively rural location.

10.15 Safety and security

“Create and maintain safer and more secure communities”

Commentary on the spatial strategy

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

Commentary on other policies

10.15.2 A number of thematic policies have positive implications for safety / feeling of safety:

- Policy I2 (Supporting the Department for Transport’s “Road Investment Strategy”) states that: Guildford Borough Council is committed to working with Highways England to facilitate major, long-term improvements to the A3 trunk road and M25 motorway in terms of both capacity and safety…”

- Policy H1 (Homes for all) requires that new Traveller sites must have “adequate utility services and amenity space, space for related business activities where appropriate, safe vehicular access…”

- Policy E7 (Guildford Town Centre) states that: “By 2033, Guildford town centre will have… more varied uses during the evening and night-time, including along the riverside, with residents and visitors feeling safe.”

- Policy D1 (Making better places) states that: “Residential developments of 25 or more dwellings must… create places that are easy to get to and through, foster active lifestyles, are easy to understand and navigate, and feel safe during the day and night, and provide convenient and safe routes through the development and to nearby areas for pedestrians and cyclists.”

- Policy I3 (Sustainable transport for new developments) includes a number of references to safety, including the high-level statement that: “We will expect that new developments will contribute to the delivery of an integrated, accessible and safe transport system, balanced in favour of sustainable transport modes, to facilitate sustainable development.”

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

10.15.4 Thematic policy and site-specific policy established through the plan will have a major influence on masterplanning, layout, landscaping and design, which in turn will have implications for safety and perceptions of safety. The plan performs well; however, it is not possible to conclude the likelihood of significant positive effects.

10.16 Transport

The sustainability objective here is to: “Achieve a pattern of development which minimises journey lengths and encourages the use of sustainable forms of transport (walking, cycling, bus and rail)”. Presented below is an appraisal of the draft plan, in terms of this objective.

Commentary on the spatial strategy

10.16.1 Traffic is a key issue locally, both on strategic and local roads (where a range of ‘hotspots’ have been identified); hence the spatial strategy must be scrutinised in terms of the potential to support modal shift (i.e. walking cycling and use of public transport, rather than reliance on the private car), minimise worsened traffic along key routes and at key junctions and deliver required upgrades to transport infrastructure.

10.16.2 A faster rate of growth than previously experienced in Guildford leads to issues, given that Guildford is a constrained location (certainly in the regional context, and potentially in the sub-regional context; albeit it is recognised that parts of Waverley - including the Dunsfold Aerodrome site that is under consideration for significant growth - are not well connected). Concerns also relate to past experiences, which indicate that transport infrastructure upgrades do not always materialise as planned, albeit past growth has been ad hoc rather than plan-led, and there was no Community Infrastructure Levy in place.

10.16.3 However, coordinated delivery of a number of the major sites will act to support the achievement of transport objectives - most notably urban extensions to Guildford at Blackwell Farm and Gosden Hill, which will support delivery of two new rail stations and more generally a Sustainable Movement Corridor through Guildford. The corridor will also serve SARP and both of the University of Surrey’s campuses. The Sustainable Movement Corridor will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists, with the aim that journeys will be rapid, reliable and safe.

10.16.4 Most other growth locations also perform well, recognising that growth at Normandy/Flexford and the Horsleys will ensure residents have good access to a rail station, and the new community at Send Marsh / Burnt Common will have good opportunity to make use of the new Park and Ride facility, set to be delivered as part of the Gosden Hill scheme. Wisley Airfield does not perform well as a growth location, given its relatively isolated location; however, the scale of the scheme would enable good potential to provide a high quality bus service in perpetuity and deliver some cycle route improvements to important destinations, and it is recognised that the orientation of the Guildford Sustainable Movement Corridor supports growth at Wisley. There is also the potential for this scheme to worsen traffic conditions on the Strategic Road Network which could affect road safety. However, there are planned upgrade works in the vicinity of the site.50

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50 The Department of Transport’s Road Investment Strategy (RIS) for the 2015/16 – 2019/20 Road Period 1 includes a long term funding commitment to provide additional capacity at M25 Junctions 10-16 and M25 Junction 10/A3 Wisley interchange.
Commentary on other policies

10.16.5 Policy I1 (Infrastructure and delivery) seeks to ensure the timely provision of suitable, adequate infrastructure recognising that historically infrastructure provision and upgrading has not always kept pace with the growth of population, employment and transport demands, and in parts of the borough some infrastructure is currently at or near to capacity, or of poor quality. The policy is clear that: “Where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused.” The Infrastructure Delivery Plan that supports this Plan focuses on a range of types of infrastructure, including Strategic Road Network, Local Road Network, park and ride, bus facilities and bus priority, cycling, walking, rail.

10.16.6 Policy I2 (Supporting the Department for Transport’s ‘Road Investment Strategy’) reflects the critical importance of implementing the three Road Investment Strategy (RIS) schemes during the Plan period. Specifically, the policy requires that developers of proposal sites adjacent to the A3 and M25 and other large sites work closely with Highways England to ensure that their layout and access arrangement(s) are consistent with Highways England’s emerging schemes.

10.16.7 Policy I3 (Sustainable transport for new developments) seeks to complement the spatial strategy, by promoting the use of sustainable transport modes and improvements to the transport network that will mitigate development. The policy refers to a range of measures, and the supporting text helpfully summarises that: “Measures designed to encourage people to make sustainable travel choices… can include car clubs, car sharing, infrastructure / facilities for electric charging plug-in points and other ultra-low emission vehicles, encouraging the accelerated uptake of cleaner fuels and technologies resulting in carbon and vehicle emission reductions, the provision of cycle infrastructure, pedestrian wayfinding and cycle parking, including for adult tricycles which can be suitable for those with disabilities and older people concerned about their balance, and the marketing and promotion of sustainable travel choices, for instance the provision of resident travel information packs.”

Appraisal of the draft plan as a whole (in terms of transport objectives)

10.16.8 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.

10.17 Waste

“Reduce waste generation and achieve the sustainable management of waste”

Commentary on the spatial strategy

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

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

10.17.2 Policy D2 (Sustainable design, construction and energy) states that: “Proposals for development, including refurbishment, conversion and extensions to existing buildings, must set out in a sustainability statement how they will deliver… “the efficient use of mineral resources and the incorporation of a proportion of recycled and/or secondary aggregates [and] waste minimisation and reusing material derived from excavation and demolition.” The policy also states that: “When meeting these requirements, the energy and waste hierarchies should be followed except where it can be demonstrated that greater sustainability can be achieved by utilising measures further down the hierarchy.”

Appraisal of the draft plan as a whole (in terms of waste objectives)

10.17.3 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.

10.18 Water quality and resources

“Maintain and improve the water quality of the borough’s rivers and groundwater, and to achieve sustainable water resources management”

Commentary on the spatial strategy

10.18.1 In-line with the objectives of the European Water Framework Directive there is a need to ensure that development does not reduce the quality of, or otherwise place pressure on, the water environment. However, it is not thought likely that the spatial strategy will have a significant bearing.

10.18.2 With regards to the risk of direct pollution, it is assumed that polluting land uses allocated through the plan (industry and a cemetery) have taken account of risk to groundwater. It is recommended that site-specific policy is reviewed, to ensure that there would not be benefit to requiring specific mitigation measures.

10.18.3 With regards to the risk of indirect pollution - i.e. the risk of capacity breaches at wastewater treatment plants, leading to pollution - no major waste water infrastructure ‘pinch points’ are known of, albeit Thames Water have stated (through representations) in relation to a number of sites that: “We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.”

10.18.4 Finally, it is noted that the quantum of growth at SARP in the plan period is expected to be approximately 1,000 homes, given the need to relocate the current Sewage Treatment Works, which is unlikely until some way into the plan period.
Commentary on other policies

10.18.5 Policy P4 (Flood risk and water source protection zones) states that: “Development within Groundwater Source Protection Zones will only be permitted provided that it has no adverse impact on the quality of the groundwater source and it does not put at risk the ability to maintain a public water supply.” The supporting text then goes on to state that: “Proposals for polluting industries, cemeteries and other similar uses are unlikely to be appropriate in the borough’s identified Source Protection Zones.”

10.18.6 Policy D2 (Sustainable design, construction and energy) states that: “Proposals for development, including refurbishment, conversion and extensions to existing buildings, must set out in a sustainability statement how they will deliver… “the highest levels of energy and water efficiency that are achievable.” The supporting text goes on to reference a water efficiency standard for new buildings of 110 litres per occupant per day.

10.18.7 Policy I4 (Green and blue infrastructure) states that: “Development proposals that are likely to have an impact on waterways, including the River Wey catchment, must demonstrate how they will support the implementation of the Water Framework Directive and have followed guidance from the Environment Agency and Natural England on implementation of the Wey Catchment Plan and flood risk management.”

Appraisal of the draft plan as a whole (in terms of water objectives)

10.18.8 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.
10.19 Conclusions at this current stage

10.19.1 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.

10.19.2 It is not possible to conclude on whether or not the draft plan is ‘sustainable’, or whether an alternative approach should be followed; however, a number of specific recommendations are made at the current time - see Box 10.2. These recommendations might be raised as part of discussions at the plan’s examination, and ultimately lead to modifications to the plan.

Box 10.2: Summary of recommendations arising from the draft plan appraisal

- Supplement Policy A47 (Land to east of The Paddocks, Flexford), adding detail regarding the type of mitigation necessary to address the SNCI constraint (the whole site being designated an SNCI, albeit the designation is currently under review).
- Make a firm commitment to bringing forward a Guildford Town Centre Masterplan and/or Local Plan Review should it be the case that technical studies identify strategic flood risk solutions within the town centre (which would in turn free up a number of site for redevelopment).
- Site-specific policy for Wisley Airfield should specify the need for a GP surgery (as opposed to referencing the need for 550 sq m services in a new Local Centre.
- The plan should expand upon how regeneration objectives will be achieved through SARP, recognising the opportunities that exist.
- Site-specific policy for Wisley Airfield should specify more precisely what measures are required in order to avoid/mitigate heritage impacts.
- Supplement policy requirements in respect of delivering a housing mix, with a view to ensuring that the full range of needs are met within the various parts of the borough.
- Consider moving policy requirements relating to housing density as the link to ‘Homes for all’ is not clear and there is a need to avoid diluting other important policy messages.
- Review the ‘Rural economy’ policy to ensure that it is not overly supportive of development and activities that could conflict with more traditional rural uses, most notably farming.
- Clarify that the spatial strategy in respect of polluting development has sought to avoid areas of groundwater sensitivity, and considering adding site-specific mitigation policy.
PART 3: WHAT HAPPENS NEXT?
INTRODUCTION (TO PART 3)

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

PLAN FINALISATION

12.1.1 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).

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

MONITORING

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

13.1.2 The draft plan document includes a range of proposed monitoring indicators, and from this list it is suggested (given appraisal findings presented above) that a number are of particular importance from an SA perspective - see Table 13.1.

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

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

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

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

<table>
<thead>
<tr>
<th>Questions answered</th>
<th>As per regulations... the SA Report must include...</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Introduction</strong></td>
<td></td>
</tr>
<tr>
<td>What’s the plan seeking to achieve?</td>
<td>● An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</td>
</tr>
<tr>
<td>What’s the sustainability ‘context’?</td>
<td>● Relevant environmental protection objectives, established at international or national level</td>
</tr>
<tr>
<td>What’s the sustainability ‘baseline’?</td>
<td>● Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</td>
</tr>
<tr>
<td>What are the key issues and objectives that should be a focus?</td>
<td>● Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</td>
</tr>
<tr>
<td>Part 1</td>
<td></td>
</tr>
<tr>
<td>What has plan-making / SA involved up to this point?</td>
<td>● The environmental characteristics of areas likely to be significantly affected</td>
</tr>
<tr>
<td></td>
<td>● Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</td>
</tr>
<tr>
<td>Part 2</td>
<td></td>
</tr>
<tr>
<td>What are the SA findings at this current stage?</td>
<td>● Key environmental problems / issues and objectives that should be a focus of (i.e. provide a ‘framework’ for) assessment</td>
</tr>
<tr>
<td></td>
<td>● Outline reasons for selecting the alternatives dealt with (and thus an explanation of the ‘reasonableness’ of the approach)</td>
</tr>
<tr>
<td></td>
<td>● The likely significant effects associated with alternatives</td>
</tr>
<tr>
<td></td>
<td>● Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</td>
</tr>
<tr>
<td>Part 3</td>
<td></td>
</tr>
<tr>
<td>What happens next?</td>
<td>● The likely significant effects associated with the draft plan</td>
</tr>
<tr>
<td></td>
<td>● The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</td>
</tr>
<tr>
<td></td>
<td>● A description of the monitoring measures envisaged</td>
</tr>
</tbody>
</table>
Table B: Questions answered by this SA Report, in-line with regulatory requirements

### Schedule 2

**The report must include...**

- (a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;
- (b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;
- (c) the environmental characteristics of areas likely to be significantly affected;
- (d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/405/EEC and 92/43/EEC;
- (e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
- (f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
- (g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
- (h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;
- (i) a description of the measures envisaged concerning monitoring.

**Interpretation of Schedule 2**

**The report must include...**

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
- Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
- The relevant environmental protection objectives, established at international or national level
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
- The environmental characteristics of areas likely to be significantly affected
- Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
- Key environmental problems / issues and objectives that should be a focus of appraisal
- The likely significant effects associated with the draft plan
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan
- A description of the measures envisaged concerning monitoring

- i.e. answer - What’s the ‘context’?
- i.e. answer - What are the ‘baseline’?
- i.e. answer - What are the key issues & objectives?
- i.e. answer - What has Plan-making / SA involved up to this point?
- [Part 1 of the Report]
- [Part 2 of the Report]
- [Part 3 of the Report]
Whilst Tables A and B signpost broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met - see Table C.

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

<table>
<thead>
<tr>
<th>Regulatory requirement</th>
<th>Discussion of how requirement is met</th>
</tr>
</thead>
<tbody>
<tr>
<td>Schedule 2 of the regulations lists the information to be provided within the SA Report</td>
<td>Chapter 3 ('What's the plan seeking to achieve') presents this information.</td>
</tr>
<tr>
<td>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;</td>
<td>These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The Scoping Report was updated post consultation, and is available on the website.</td>
</tr>
<tr>
<td>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;</td>
<td>The outcome of scoping was an ‘SA framework’, and this is presented within Chapter 4 ('What's the scope of the SA') in a slightly updated form.</td>
</tr>
<tr>
<td>c) The environmental characteristics of areas likely to be significantly affected;</td>
<td>Also, more detailed messages from the Scoping Report - i.e. messages established through context and baseline review - are presented (in an updated form) within Appendix II.</td>
</tr>
<tr>
<td>d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;</td>
<td>The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an ‘SA framework’. The SA framework is presented within Chapter 4 ('What's the scope of the SA'). Also, messages from the context review are presented within Appendix II.</td>
</tr>
</tbody>
</table>
| e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation; | With regards to explaining “how… considerations have been taken into account” -  
  - Chapters 5 explains how/why understanding of the issues that should be a focus of alternatives appraisal was refined in 2015/16 subsequent to earlier consultation/SA.  
  - Chapters 6 explains how reasonable alternatives were established in 2015/16 in-light of earlier consultation/SA.  
  - Chapter 8 explains the Council’s 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).  
  - Chapters 10-28 summarise how findings and recommendations from the 2014 draft plan appraisal, and appraisal of a working draft plan in early 2016, have been taken into account. |
<table>
<thead>
<tr>
<th>Regulatory requirement</th>
<th>Discussion of how requirement is met</th>
</tr>
</thead>
</table>
| f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects); | • Chapter 7 presents alternatives appraisal findings (in relation to the spatial strategy, which is the ‘stand-out’ plan issue and hence that which should be the focus of alternatives appraisal/consultation).  
• Chapters 10-28 present the Draft Plan appraisal. As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/dimensions. |
| g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme; | The 2014 appraisal of the Draft Plan identified negative effects in terms of certain issues, with a view to stimulating the Council to revisit aspects of the plan; however, the report did not make explicit recommendations. At the current time, the appraisal identifies how the plan might potentially ‘go further’ in certain respects, and also makes a number of specific recommendations. |
| h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information; | Chapters 5 and 6 deal with ‘Reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on particular issues and options.  
Also, Chapter 8 explains the Council’s ‘reasons for selecting the preferred option’ (in-light of alternatives appraisal).  
Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives. |
| i) description of measures envisaged concerning monitoring in accordance with Art. 10; | Chapter 31 presents measures envisaged concerning monitoring. |
| j) a non-technical summary of the information provided under the above headings | The NTS is a separate document. |
### Regulatory requirement | Discussion of how requirement is met
--- | ---
The SA Report must be published alongside the draft plan, in-line with the following regulations | An Interim SA Report, which essentially presented the information required of the SA Report, was published for consultation alongside the ‘Draft Plan: Strategy and sites’ consultation document in 2014, under Regulation 18 of the Local Planning Regulations. At the current time, the SA Report is published alongside the Proposed Submission Plan, under Regulation 19, so that representations might be made ahead of submission.

Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2) | The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

The SA Report must be taken into account, alongside consultation responses, when finalising the plan. | The Council has taken into account the Interim SA Report (2014), alongside consultation responses received, when finalising the plan for publication. Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when finalising the plan at Examination (i.e. taken into account by the Inspector, when considering the plan’s soundness, and the need for any modifications).
APPENDIX II - CONTEXT AND BASELINE REVIEW

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

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

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

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

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

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

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

However, despite the borough's relative affluence, pockets of deprivation exist. For the purposes of the Index of Multiple Deprivation, the borough is divided into 84 smaller areas called lower super output areas (LSOAs). Whilst none of the borough's LSOA's fall within the most deprived ten percent nationally, one is located in the top twenty percent and a further 14 areas are classified within the most deprived half of lower super output areas.
The Council’s Project Aspire aims to improve the lives of residents in the borough’s least advantaged areas by working with partners, businesses and communities to deliver the changes local people wish to see. The project will initially focus on enhancing the quality of life and prospects of residents in north Guildford by encouraging these less advantaged communities to become more self-confident and self-reliant.

**Economy and employment**

Approximately 3.3% of working age adults in the borough are unemployed (as of January 2016) compared to 5.4% of working age adults nationally. However, there is a skills shortage in some sectors and many workers are unable to afford homes close to work.

The number of jobs locally continues to grow in line with the borough’s role as a regional administrative and commercial centre. Guildford’s economy is strong in areas that the government has announced are high priority growth areas for the UK including health and life sciences, space, digital and creative industries, and professional services. There is an emerging cluster of innovative industries, some based at the Surrey Research Park and the University of Surrey and others in the town centre. There are some emerging clusters built around 5G technologies and veterinary science (including the significant recent investment and presence of the Pirbright Institute, world leaders in animal virology) which have considerable potential for inward investment and business start ups. The borough is home to the headquarters of major global companies including Allianz, Ericsson, Phillips, Electronic Arts and Avaya.

A significant amount of existing employment floor space in the borough is located on the seventeen strategic employment sites identified in the Employment Land Needs Assessment (2015) (ELNA). Each site accounts for over 100 jobs and has greater than 1.5 hectares (ha) and 7,000 sq m of floor space. Together these sites make up over 170 ha of employment land and almost 600,000 sq m and approximately 70 per cent of all Bclass floor space within the borough. The seventeen key sites are home to over 1,000 businesses. Elsewhere in the borough a significant contribution is made by employment on much smaller sites. These are located on a mixture of industrial estates, in villages and in rural areas.

The borough offers a varied leisure and visitor experience, encompassing both the tranquillity of the countryside along with the vibrancy of Guildford’s town centre. As one of the fastest growing industries in the borough, the sector also makes a significant contribution to Guildford’s economy; tourism alone generating over £330 million of income for local businesses and supporting more than 6000 jobs in 2014.

The 2014 Strategic Economic Plan prepared by Enterprise M3 (the Local Enterprise Partnership) encourages the identification of strategic sites for development of sustainable new communities in the longer term, to ensure an adequate pipeline of new housing provision and therefore an adequate workforce. The LEP encourages a focus of growth at ‘Step Up Towns’ (Camberley, Aldershot, Andover, Whitehill and Bordon and Staines) and Growth Towns including Guildford (plus Basingstoke, Farnborough and Woking).

*The Enterprise M3 LEP area*
Flooding

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

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

Detailed flood risk modelling has not been undertaken in all parts of the borough. However, the main areas expected to be at risk of flooding during and beyond the plan period are identified within the Council’s Level 1 Strategic Flood Risk Assessment (SFRA) and the Environment Agency’s flood risk maps. The Level 1 SFRA highlights the areas at risk of fluvial, groundwater, surface water and sewer flooding and flooding caused by artificial sources. The document also identifies the borough’s functional floodplain (known as flood zone 3b), which consists of land considered to be at high risk of flooding. The functional floodplain (flood zone 3b) in Guildford has historically undergone moderate levels of development. To reflect its existing state, the Level 1 SFRA differentiates between the borough’s ‘developed’ and ‘undeveloped’ functional floodplain. ‘Developed’ functional floodplain constitutes the footprint of existing buildings located within the identified functional floodplain.

Health

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

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

Guildford performs well when compared to the South East and England for long-term health problems or disability. Guildford has one GP for every 1,565 residents, which is better than the national NHS standard of one GP per 1,800 patients.

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

In addition to this, parts of Friary and St Nicolas, Holy Trinity, Ash South and Tongham, Ash Wharf, Stoke and Ash Vale are within the top national quartile in terms of mental health problems. One in four adults drinks alcohol above sensible levels; this places Guildford in the top ten council areas nationally for hazardous drinking.

Historic environment

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

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52 Statistics taken from the 2014 Interim SA Report, which includes all references.
Housing

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

The SHMA indicates that approximately half of all Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy. The reason for a high level of affordable housing need in the borough is the high cost of buying or renting homes on the open market in relation to local incomes. Average house prices are currently £186,325 across England and Wales, £387,044 in Surrey and £407,160 in Guildford.

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

From the SHMA 2015 there is also known to be:

- a need for 40% one bedroom, 30% two bedroom, 25% three bedroom and 5% four bedroom affordable homes
- a need 10% one bedroom, 30% two bedroom, 40% three bedroom and 20% four bedroom market homes.
- an ageing population with a significant projected growth in the over 65 year olds
- a projected increase in people with long term health problems or disability
- an estimated need for 242 registered care bedspaces over the plan period
- an estimated need for 1,334 specialist homes for older people over the plan period
- approximately 15,635 households with dependent children and approximately 4,689 households containing non-dependent children.

Landscape

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

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

Rural economy

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

In addition to farming, food and tourism the range of jobs and businesses is extensive including shops, workshops, distribution, ICT, childcare and education, residential homes, manufacturing, property, corporate headquarters and offices. Internet business and working from home is increasing. This shows the diversity of the borough’s rural economy and supports the view that all forms of business can be appropriate in the countryside.
Enterprise M3 LEP has established a Rural Action Group to promote the economic interests of the rural areas which comprise the larger part of the sub-region. The Rural Action Group will promote viable and vibrant sustainable rural communities across the LEP area, aiming to secure long term growth of the economy and the labour force whilst also promoting sustainable management of the countryside and protecting landscapes.

**Transport**

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

The borough benefits from twelve rail stations, including Guildford railway station, the busiest in the county, which provides access to, and interchange between, four lines. These rail lines fan out to serve other stations and destinations beyond including London Waterloo, Woking, Reading, Redhill and Gatwick Airport.

Most communities are served by bus, which are operated on a largely commercial basis, with park and ride available on several approaches to Guildford. There is also a reasonable network of cycle routes and footpaths.

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

**Waste**

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

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

Surrey County Council adopted its Aggregates Recycling Joint DPD in February 2013. The Aggregates Recycling Joint DPD forms part of the Surrey Minerals and Waste Development Framework and its provisions are a material consideration in the determination of planning applications. The document sets out proposals with regard to the provision of aggregates recycling facilities across the county for the period up to 2026. The Aggregates Recycling Joint DPD allocates the preferred areas for locating aggregate recycling facilities. It should be read alongside the Surrey Waste Plan 2008, the Surrey Minerals Plan Core Strategy 2011 and the Surrey Minerals Plan Primary Aggregates DPD 2011.

**Water quality and water resources**

Water quality and groundwater protection are significant issues in the borough. Approximately thirty percent of the Council’s administrative area is located on principle aquifers whilst 14 Source Protection Zones (SPZs) are located in the borough. The Environment Agency defines SPZs as groundwater sources, including wells, boreholes and springs, used for public drinking water supply. To protect these sources of drinking water, several restrictions will apply to the type of development permitted within the SPZs.

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

Introduction
As explained within Chapter 6 above, whilst numerous thematic, borough-wide policy issues were the focus of alternatives appraisal in 2013 and 2014 (with appraisal findings presented within Interim SA Reports), in 2015/16 it was determined that these issues need no longer be a focus of alternatives appraisal, and that it would be a distraction to present past appraisal findings in full within this report. Rather, there should be a focus within this report on alternative spatial strategies (see Part 1, and Appendix V).

Nonetheless, it is appropriate to present summary information at the current time, and that is the aim of this appendix. As per the 2014 Interim SA Report this appendix considers a number of policy issues in turn, essentially exploring the justification for the preferred approach.

A select range of the issues covered within the 2013 and 2014 Interim SA Reports are covered here. Particular attention is paid to two issues – Employment land; and Traveller accommodation - as it is the case that the situation (in respect of evidence and understanding of the issues) has moved on since 2014.

Mix and density
The 2013 Interim SA Report considered four alternatives: 1) Specific mix and density of homes for the different areas within the borough; 2) Seeking a lower or similar density than is currently the case; 3) Seek higher densities; and 4) A more flexible approach and assess each site on a case by case basis having regard to the character of the surrounding area and the sustainability of the location.

The preferred approach was, and still is, Option (4) - ‘Case-by-case’ approach (with higher density development supported in Guildford town centre) having regard to the local context, character of the surrounding area and the accessibility of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials. Whilst there is a need to make efficient use of land, to seek higher densities regardless of context could be to the detriment of local character.

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

The preferred approach is that affordable homes should be provided: on sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes; and at least 40 per cent of the homes on these sites must be affordable homes. Land values and property prices are generally high across the borough, although with considerable variation. Viability evidence shows that the vast majority of developments in most locations in the borough are viable providing an affordable housing contribution of 40 per cent. Where developers demonstrate that providing the amount of affordable housing required by policy would not be economically viable, the Council will follow the following cascade mechanism to assist with delivering a scheme: 1) vary the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; 2) reduce the overall number of affordable homes. In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost; and developments that seek to avoid the requirements of policy by failing to make most efficient use of land or by artificially subdividing land into smaller sites will not be permitted.

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

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

**Tourism, arts and cultural facilities**

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

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

**Balancing growth with traffic and congestion**

The 2013 Interim SA Report considered five options: 1) Focus new development that will generate significant movement in locations where the need to travel will be minimised and the use of sustainable transport modes can be maximised, including locations which can be made highly accessible by passenger transport (including by park and ride services) and are served by cycle and pedestrian routes; 2) Expect all developments which generate significant amounts of movement to provide a long-term travel plan, identifying the movements the development will generate and how these would be managed to deliver sustainable transport outcomes; 3) Continue to identify and bring forward further park and ride facilities, particularly along the northern and eastern approaches to Guildford town; 4) Require new developments to make use of or contribute financially towards improvements to passenger transport services (including park and ride services) and improved access for cyclists and pedestrians; and 5) Set aside more road space on the main approaches into Guildford town centre to improve routes for pedestrians, cyclists and buses.

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

**Green open space**

The 2013 Interim SA Report considered three options: 1) Require developers of large developments (of 300 homes or more) to provide their own Suitable Alternative Natural Green space (SANG); 2) Continue to work to deliver the expanded and new SANG sites set out in the Council’s Thames Basin Heaths SPA Strategy; 3) Identify further new SANG in suitable locations, which might necessitate the Council purchasing land or negotiating with land owners to make their land available for SANG.

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

**Built environment**

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

The preferred approach reflects a combination of (2) and (3), given the strategic nature of the Strategy and Sites part of the Local Plan and the need to ensure a strategic framework for achieving a better standard of built environment and design in the borough. (1) was rejected as this option espoused a development management approach that will be explored in the Delivering Development Part 2 Local Plan that will follow on after the Strategy and Sites Local Plan. In essence this option was not rejected but postponed until a more appropriate stage in the Local Plan was reached.
Employment space

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

Since 2013/14 the situation has moved on, in light of new evidence and understanding. However, it is not thought that there is a need to revisit formal alternatives appraisal. As explained across the following paragraphs, the preferred approach is strongly justified.

The Employment Land Needs Assessment (ELNA, AECOM, 2015) applied a specific methodology to determine how much employment floorspace is required over the plan period. Three independently derived projections of future workplace employment were used to forecast employment change over the period 2015-2033: • Cambridge Econometrics Employment Projections, 2015 (Cambridge Econometrics); • UK Local Market Forecasts, 2015 (Experian); and • Local Authority District Forecasting Model, 2015 (Oxford Economics). Subsequently, AECOM took a mean average of the three employment forecasts and projected the growth from a 2015 baseline. Subsequently, the ratio between historic floorspace and employment growth was applied to the future employment forecast to estimate how much floorspace would be needed. Table A shows the outcomes of the ELNA alongside the outcome of two previous studies for comparison. The difference between the figures is driven both by the use of different forecasts and by the different methodology for translating the forecasts into the need for floorspace. The Council is confident that the 2015 ELNA provides the most robust and up-to-date information, and as such proposes to meet the needs identified.53

Table A: Comparison of floorspace requirements calculated by three studies

<table>
<thead>
<tr>
<th></th>
<th>2013 ELA</th>
<th>2014 ELA (unpublished)</th>
<th>2015 ELNA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total B class</td>
<td>10.5 – 20 ha</td>
<td>21.6 – 29.2 ha</td>
<td></td>
</tr>
<tr>
<td>B1a and b</td>
<td>6.5 – 11 ha</td>
<td>11.3 – 15.3 ha</td>
<td>37,200 – 47,200 sqm</td>
</tr>
<tr>
<td>B2 and B8</td>
<td>4 – 9 ha</td>
<td>8.3 – 13.9 ha</td>
<td>4.7 – 5.3 ha</td>
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</tbody>
</table>

With regards to distribution, there is a need to define and implement a Guildford-specific sequential approach.

- With regards to office development (B1a) and research / development floorspace (B1b) the preferred location is in Guildford town centre; then edge of centre locations within 500m of a public transport interchange;64 then the existing Strategic Employment Sites. In-line with these principles, a clear preferred approach to allocation emerges focused on Guildford town centre, Surrey Research Park (given specific opportunities), the Gosden Hill strategic site (given access to the A3 and sustainable transport) and Wisley Airfield (something of an exception, but appropriate given the desire for a mixed use new community).

- With regards to industrial and storage development (B2 and B8), a sequential approach means directing proposals to the strategic industrial sites and the sites identified as suitable in the LAA. In-line with these principles, and recognising that a large proportion of the net additional land requirement may be met through existing permissions, it is also the case that a clear preferred

53 The scale of the functional economic area (FEMA) is also a relevant consideration when determining a quantum figure. The FEMA has been understood to comprise the area covered by Guildford, Waverley and Woking; however, the Enterprise M3 Commercial Property Market Study (Regeneris Consulting, 2016) highlighted some uncertainties. Specifically the study highlighted that the commercial property markets of Guildford and Woking do not relate as well to each other, i.e. it cannot be assumed that a shortage of commercial space in Guildford can be addressed in Woking. However, despite this ‘split’, it is considered that the area covered by Guildford, Woking and Waverley remains the appropriate FEMA. Commercial property markets are just one criteria that LPAs need to consider when defining their FEMA. Other important considerations are the housing market area (e.g. migration and travel to work patterns), service markets for consumers and the catchment areas of facilities providing cultural and social well-being.

64 The decision has been taken to define ‘transport interchanges’ as rail stations and bus stations, concentrations of three or more bus stops on-street, and bus hubs with three or more bus stops, within the urban areas, district and local centres. The following train stations are excluded Chilworth; Clandon; Gomshall; Shalford - because they are within the Green Belt, AONB, outside of the urban area and are not on the edge of an urban area or within a district or local centre and are therefore not considered to be suitable locations for high trip generating uses. Also, Effingham junction is excluded because of the distance between the train station and the built up area. Finally, it is important to note that Park and Ride locations are not defined as transport interchanges.
approach emerges. Developing the preferred approach did lead to a choice between three alternative sites - two at Burnt Common and another adjacent to Slyfield Industrial Estate - however, the Council believes that the preferred option (Garlicks Arch, Burnt Common) is firmly justified. The site is lower sensitivity Green Belt than the Slyfield Industrial Estate site (albeit it is recognised that the Slyfield site benefits from its location in commercial respects), and will support delivery of a new junction onto the A3 (unlike the other Burnt Common site, albeit it is recognised that this site is less constrained from a flood risk/biodiversity perspective, and includes some existing buildings).

**Traveller accommodation**

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

Since 2013/14 the situation has moved on somewhat, in light of new evidence and understanding. However, it is not thought that there is a need to revisit formal alternatives appraisal. As explained across the following paragraphs, the preferred approach is strongly justified.

Since the Travellers Accommodation Assessment (2012), which set out how many traveller pitches and plots are needed up to 2027, a number of pitches have been granted permission; and more generally it is recognised that the TAA is now somewhat dated. The Council is awaiting clear guidance from Government before undertaking an update, and in the interim has determined to take the pragmatic approach of allocating more sites than the TAA required – to reflect the fact that the plan period extends to 2033, i.e. six years beyond the TAA. This approach is considered pragmatic and proportionate, and does not equate to a decision to ‘over supply’.

The Land Availability Assessment (2016) identifies land in the borough that has potential to provide traveller accommodation over the plan period to 2033. In summary, the Council’s preferred approach is to meet need through: A) Direct provision; B) Making temporary permissions permanent and insetting, where appropriate; and C) Provision as part of sites over 500 homes (as set out in policy H1).

In a number of cases, in order to ensure that allocations are realistically deliverable, and thereby ensure that the Local Plan is sound in this respect, it is necessary to inset proposed allocations from the Green Belt. Given the difficulties in identifying sites that are suitable, available and deliverable, and the current location of temporary permissions, there is a need to use sensitive Green Belt in some cases – see Table A.
### Table A: Proposed Traveller site allocations, with Green Belt sensitivity noted and commentary on reasoning/justification

<table>
<thead>
<tr>
<th>Allocation</th>
<th>GB sensitivity</th>
<th>Commentary</th>
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| A48 Land at Home Farm, Effingham | N/a as rural exception | - Rural exception site  
- Direct Council provision on its own land  
- Planning application awaiting determination |
| A49 Palm House Nurseries, Normandy | High | - Temporary planning permission; proposed to make permanent and inset |
| A50 Whittles Drive, Normandy | High | - Intensification of an existing permanent site; proposed to be inset from the GB  
- Travelling Showpeople plots |
| A51 Land at Cobbets Close, Worplesdon | High | - Redevelopment and intensification of an existing permanent site; proposed to be inset from the GB  
- Policy to make explicit that whole site must be redeveloped to improve living conditions for all |
| A52 Four Acre Stables, Aldershot Road, Worplesdon | High | - Temporary planning permission in the GB; proposed to make permanent and inset  
- Site allocation policy to refer to balancing of personal circumstances and harm to GB and other harm. |
| A53 Roundoak, White Hart Lane, Wood Street Village | High | - Temporary planning permission in the GB; proposed to make permanent and inset |
| A54 Lakeview, Lakeside Road, Ash Vale | N/a – countryside land | - Private provision |
| A55 The Orchard, Puttenham Heath Road, Puttenham | Medium | - Temporary planning permission in the GB; proposed to make permanent and inset  
- Site allocation policy to refer to personal circumstances and what is possible on site |
| A56 Valley Park Equestrian, East Shalford Lane, Shalford | High | - Temporary planning permission in the GB; proposed to make permanent and inset |
| A57 The Paddocks, Rose Lane, Ripley | Medium | - Temporary planning permission in the GB; proposed to make permanent and inset  
- Site allocation policy to refer to balancing of personal circumstances and harm to GB and other harm |
| A44 Land west of Winds Ridge and Send Hill, Send | Low | - Direct Council provision on its own land  
- Provision of pitches as part of an extension to one of the more sustainable villages will help ensure better integration of our travelling and settled community, with good access to facilities such as school and health care. |
| A25 Gosden Hill Farm, Merrow Lane, Guildford | Medium | - Strategic development site, allowing for successful integration and access to facilities. |
| A26 Blackwell Farm, Hogs Back, Guildford | Medium |  |
| A35 Land at former Wisley airfield, Ockham | Medium |  |
| A24 Slyfield Area Regeneration Project, Guildford | N/a – urban area |  |
| A46 Land to the south of Normandy and north of Flexford | High | - Strategic development site  
- There is no available alternative site that can provide Travelling showpeople plots in the first five years of the plan to meet need. |
APPENDIX IV - SITE OPTIONS

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

The aim of this appendix is to:

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

Identifying reasonable site options
A shortlist of sites was identified from the long list promoted to the Council on the basis of a number of studies: Strategic Housing Land Availability Assessment (SHLAA); Green Belt and Countryside Study (GBCS); Employment Land Assessment (ELA); Draft Town Centre Area Action Plan (TCAAP). Notably, the GBCS sifted greenfield sites (both within the Green Belt and the Countryside Beyond the Green Belt) in order to identify Potential Development Areas (PDAs), which can be taken to be reasonable site options for the purposes of SA.

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

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

55 See the Scoping Report at http://www.guildford.gov.uk/newlocalplan/sustainabilityappraisal
56 Time and resource limitations mean limited potential to generate data for all site options through site visits and/or discussions with site promoters, recognising the need to ensure a 'level playing field' (i.e. ensure consistent data for all site options appraised).
57 Whilst Regulations require that the SA process identifies and evaluates significant effects of the draft plan and reasonable alternatives, there is no assumption that significant effects must be identified and evaluated for all site options considered. See Part 1 of this report for a discussion of how reasonable alternatives have been considered through the Guildford Local Plan / SA process, and in particular see Chapter 7 for an appraisal of the reasonable alternatives at the current time.
<table>
<thead>
<tr>
<th>Sustainability objectives</th>
<th>Criteria (Location in relation to…)</th>
<th>Notes</th>
</tr>
</thead>
</table>
| Conserve and enhance biodiversity and the natural environment | - European Site (SPA and SAC)  
- SSSI  
- Designations of local importance (SNCI, LNRs) | **Good data** is available to inform the appraisal, as there is the potential to measure proximity to various areas of biodiversity importance, recognising that development can lead to recreational impacts; however, it is recognised that proximity is not the only determinant of impacts. Ideally, it would be possible to draw on locally commissioned work to identify further areas of constraint/opportunity (e.g. particularly sensitive locally designated wildlife sites or other areas contributing to ‘green infrastructure’). |
| Mitigate climate change through reducing emissions of greenhouse gases | **No data** is available to inform appraisal of site options. Whilst some site options may well have inherently greater potential to incorporate on-site low carbon energy technologies (including on account of the scale of development / density of development within the local area), or link to a decentralised source of low carbon energy, there is insufficient evidence to enable robust analysis. As for the potential for development to support building integrated renewables (such as solar PV and solar heating), this is not locationally dependent (to any significant extent, although terrain / aspect is a factor). |
| Create and sustain vibrant communities | **No data** is available to inform the appraisal of site options; however, see discussion below under ‘Health’. Whilst there is the potential to query the location of site options in relation to areas of relative deprivation, it is not clear that this is a useful indicator. In the Guildford context, it is not possible to assume that development in area of relative deprivation is ‘a positive’ on the basis that it will support regeneration. |
| Maintain Guildford borough and Guildford town’s competitive economic role | **No data** is available to inform the appraisal of site options; however, see discussion below under ‘Employment’. On the basis of the available data, it is not possible to differentiate site option in terms of this objective. |
| Facilitate appropriate employment development opportunities to meet the changing needs of the economy | - Key Employment Site | **Limited data** is available to inform the appraisal. Whilst proximity to an employment site is a positive, when examining the merits of housing site options, it is recognised that in practice most people are willing to commute some distance to work. |
| Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment | - Area of flood risk  
- Area of surface water flood risk | **Good data** exists to inform the appraisal. |
| Facilitate improved health and well-being of the population, including enabling people to stay independent and reducing inequalities in health | - Healthcare facility.  
- Recreation facilities  
- Town, District ,Local centre or Village Shop  
- Primary school  
- Secondary school | **Good data** exists to inform the appraisal, recognising that proximity to community infrastructure is important, particularly for residents who are less mobile (e.g. the elderly); however, there is little or no potential to take into account the potential for development at a particular site to put ‘strain’ on community infrastructure locally, or the potential for development to fund new community infrastructure. There is no potential to account for air quality issues, recognising that there are no designated air quality management areas (AQMAs) within the borough. |
<table>
<thead>
<tr>
<th>Sustainability objectives</th>
<th>Criteria (Location in relation to…)</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Protect, enhance, and where appropriate make accessible, the archaeological and historic</td>
<td>- Registered/Historic Parks and Gardens</td>
<td><strong>Good data</strong> is available to inform the appraisal, i.e. there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting. A limitation relates to the fact that it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop sites. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis. It will sometimes be the case that development can enhance heritage assets.</td>
</tr>
<tr>
<td>environments and cultural assets of Guildford, for the benefit of residents and visitors</td>
<td>- Scheduled Ancient Monument</td>
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<tr>
<td></td>
<td>- Areas of High Archaeological Potential</td>
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<tr>
<td></td>
<td>- Listed building</td>
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<tr>
<td>Provide sufficient housing of a suitable mix taking into account local housing need,</td>
<td><strong>Limited data</strong> is available to inform the appraisal. Whilst it is worthwhile querying the size of</td>
<td></td>
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<tr>
<td></td>
<td>affordablity, deliverability, the needs of the economy, and travel patterns</td>
<td>sites – as larger sites will be more likely to provide affordable housing – it is recognised that this is a very weak indicator.</td>
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<tr>
<td>Minimise the use of best and most versatile (BMV) agricultural land and encourage the</td>
<td>- High quality agricultural land</td>
<td><strong>Limited data</strong> is available to inform the appraisal. It is possible to draw on a national data-set that shows how agricultural land quality varies; however, this data-set is ‘indicative’ only. To establish agricultural land quality accurately there is a need to apply ‘MAFF Post 1988’ criteria, which involves field surveys. A number of areas around the borough have been surveyed, such that agricultural land quality has been established accurately; however, relatively few site options have been surveyed. As such, for the purposes of this analysis, it is appropriate to apply the national data-set.</td>
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<tr>
<td>Conserve and enhance landscape character</td>
<td>- AONB</td>
<td><strong>Limited data</strong> is available to inform the appraisal, i.e. there is good potential to highlight where development may impact on valued landscape character. The borough is divided into landscape character areas, and it is understood how capacity/sensitivity varies between these areas; however, these areas are large scale and hence not suited to differentiating site options. A limitation relates to the fact that site-specific factors have not been taken into account, e.g. it has not been possible to take into account the extent to which sites are screened within the landscape.</td>
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<tr>
<td>Reduce poverty and social exclusion for all sectors of the community</td>
<td><strong>No data</strong> is available to inform the appraisal of site options; however, see discussion above under</td>
<td>Whilst there is the potential to query the location of site options in relation to areas of relative deprivation, it is not clear that this is a useful indicator. In the Guildford context, it is not possible to assume that development in area of relative deprivation is ‘a positive’ on the basis that it will support regeneration.</td>
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<tr>
<td></td>
<td>‘Health’.</td>
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</tr>
<tr>
<td>Sustainability objectives</td>
<td>Criteria (Location in relation to…)</td>
<td>Notes</td>
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<tr>
<td>Make the best use of previously developed land and existing buildings</td>
<td>- Previously developed land</td>
<td><strong>Good data</strong> exists to inform the appraisal.</td>
</tr>
<tr>
<td>Enhance the borough’s rural economy</td>
<td><strong>No data</strong> is available to inform the appraisal of site options. It is not possible to assume that all site options in a rural location are to be supported, from a ‘rural economy’ perspective.</td>
<td></td>
</tr>
<tr>
<td>Create and maintain safer and more secure communities</td>
<td><strong>No data</strong> exists to inform the appraisal of site options. Whilst the Index of Multiple Deprivation does identify areas of crime deprivation, this data is not suited to appraising site options in the Guildford context.</td>
<td></td>
</tr>
<tr>
<td>Achieve a pattern of development which minimises journey lengths and encourages the use of sustainable forms of transport (walking, cycling, bus and rail)</td>
<td>- ‘A’ road - Railway station</td>
<td><strong>Limited data</strong> is available to inform the appraisal; however, the analysis under the ‘Health’ heading (above) will also give some indication of how sites perform in terms of walking/cycling.</td>
</tr>
<tr>
<td>Reduce waste generation and achieve sustainable waste management</td>
<td>It is not possible to appraise site options in terms of the potential to support good waste management. It would not be fair to assume that larger schemes, or residential development in close proximity to recycling centres, will necessarily lead to better waste management.</td>
<td></td>
</tr>
<tr>
<td>Maintain and improve the water quality of the borough’s rivers and groundwater, and to achieve sustainable water resources management</td>
<td><strong>No data</strong> is available to inform appraisal in terms of water quality or water resource availability; however, this is not a major problem. Whilst water pollution sensitivity may vary spatially (including issues associated with the capacity of Waste Water Treatment Works), in the absence of a detailed Water Cycle Study there is no mapped data. It is also the case that issues can often be appropriately addressed through masterplanning/design measures, and so are appropriately considered at the planning application stage. The same can be said for ‘drainage’. In terms of water resource availability: water resource availability does not vary significantly within the borough, and hence need not be a consideration here; and it is not possible to appraise site options in terms of the potential to support water efficiency. It might be suggested that large development schemes (i.e. developments on large sites) might be more able to deliver high standards of sustainable design, which in turn support water efficiency; however, this assumption will often not hold true. Finally, it is unnecessary to appraise site options in terms of groundwater ‘source protection zones’ and ‘primary aquifers’. The presence of a groundwater source protection zone or aquifer does not represent a major constraint for most (non-polluting) types of development.</td>
<td></td>
</tr>
</tbody>
</table>
### Table B: Site appraisal criteria with performance categories

<table>
<thead>
<tr>
<th>Criteria (Location in relation to...)</th>
<th>Performance categories</th>
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</thead>
<tbody>
<tr>
<td>1 European Site (SPA and SAC)</td>
<td>R = &lt; 0.4 km</td>
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<tr>
<td></td>
<td>A = &lt; 5 km</td>
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<tr>
<td></td>
<td>G = &gt; 5 km</td>
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<tr>
<td>2 SSSI</td>
<td>R = &lt; 0.4 km</td>
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<td></td>
<td>A = &lt; 0.8 km</td>
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<tr>
<td></td>
<td>G = &gt; 0.8 km</td>
</tr>
<tr>
<td>3 Designations of local importance (SNCl, LNRs)</td>
<td>R = &lt; 0.4 km</td>
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<tr>
<td></td>
<td>A = &lt; 0.8 km</td>
</tr>
<tr>
<td></td>
<td>G = &gt; 0.8 km</td>
</tr>
<tr>
<td>4 Key Employment Site</td>
<td>R = &gt; 2 km</td>
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<tr>
<td></td>
<td>A = &lt; 2 km</td>
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<tr>
<td></td>
<td>G = &lt; 1 km</td>
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<tr>
<td></td>
<td>G = &lt; 0.5 km</td>
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<tr>
<td>5 Area of flood risk</td>
<td>R = Zone 3</td>
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<td></td>
<td>A = Zone 2</td>
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<tr>
<td></td>
<td>G = Zone 1</td>
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<tr>
<td>6 Area of surface water flood risk</td>
<td>A = Yes</td>
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<tr>
<td></td>
<td>G = No</td>
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<tr>
<td>7 Healthcare facility.</td>
<td>R = &gt; 1.2 km</td>
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<td></td>
<td>A = &lt; 1.2 km</td>
</tr>
<tr>
<td></td>
<td>G = &lt; 0.8 km</td>
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<tr>
<td></td>
<td>G = &lt; 0.4 km</td>
</tr>
<tr>
<td>8 Recreation facilities</td>
<td>R = &gt; 0.8 km</td>
</tr>
<tr>
<td></td>
<td>A = &lt; 0.8 km</td>
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<tr>
<td></td>
<td>G = &lt; 0.4 km</td>
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<tr>
<td></td>
<td>G = &lt; 0.2 km</td>
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<tr>
<td>9 Town, District ,Local centre or Village Shop</td>
<td>R = &gt; 0.8 km</td>
</tr>
<tr>
<td></td>
<td>A = &lt; 0.8 km</td>
</tr>
<tr>
<td></td>
<td>G = &lt; 0.4 km</td>
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<td></td>
<td>G = &lt; 0.2 km</td>
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<tr>
<td>10 Primary school</td>
<td>R = &gt; 2 km</td>
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<td></td>
<td>A = &lt; 2 km</td>
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<td></td>
<td>G = &lt; 1 km</td>
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<tr>
<td></td>
<td>G = &lt; 0.5 km</td>
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<tr>
<td>11 Secondary school</td>
<td>R = &gt; 2 km</td>
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<td></td>
<td>A = &lt; 2 km</td>
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<td></td>
<td>G = &lt; 1 km</td>
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<tr>
<td></td>
<td>G = &lt; 0.5 km</td>
</tr>
<tr>
<td>12 Registered/Historic Parks and Gardens</td>
<td>R = &lt; 0.01 km</td>
</tr>
<tr>
<td></td>
<td>A = &lt; 0.025 km</td>
</tr>
<tr>
<td></td>
<td>G = &gt; 0.025 km</td>
</tr>
<tr>
<td>13 Scheduled Ancient Monument</td>
<td>R = &lt; 0.01 km</td>
</tr>
<tr>
<td></td>
<td>A = &lt; 0.025 km</td>
</tr>
<tr>
<td></td>
<td>G = &gt; 0.025 km</td>
</tr>
<tr>
<td>Criteria (Location in relation to...)</td>
<td>Performance categories</td>
</tr>
<tr>
<td>-------------------------------------</td>
<td>------------------------</td>
</tr>
</tbody>
</table>
| 14 Areas of High Archaeological Potential | R = < 0.01 km  
A = < 0.025 km  
G = > 0.025 km |
| 15 Listed building | R = < 0.01 km  
A = < 0.025 km  
G = > 0.025 km |
| 16 [Site size] | A = <0.5 ha  
G = >0.5 ha  
G = > 1,000 home capacity |
| 17 High quality agricultural land | R = Grade 1  
A = Grade 2 or 3  
G = Grade 4 or higher |
| 18 AONB | R = Within  
G = Outside |
| 19 Previously developed land | R = No  
A = Part  
G = Yes |
| 20 ‘A’ road | R = > 2 km  
A = < 2 km  
G = < 1 km  
G = < 0.5 km |
| 21 Railway station | R = > 2 km  
A = < 2 km  
G = < 1 km  
G = < 0.5 km |
Site options appraisal findings

Tables C presents an appraisal of all reasonable site options in terms of all the criteria introduced above. Table C lists site options firstly according to settlement, secondly according to whether or not the site option in question is a proposed allocation, thirdly according to proposed use and fourthly according to capacity.

N.B. it is recognised that only limited understanding can be gained from strict GIS analysis. Equally it is recognised that presenting appraisal findings for all site options in tabular format is in practice of limited assistance to those interested in the spatial strategy. The spreadsheet containing the underlying data is available upon request. The spreadsheet allows for more effective interrogation of the data as it is possible to compare and contrast particular sites (that might be alternatives) and examine sub-sets (e.g. sites around a particular settlement, or sites above a certain size threshold).

Table C: Site options appraisal findings

[N.B. Use acronyms are: Allot= Allotment; Cem= Cemetery; E=Economic; ED= Education; H= Housing; G&T= Travellers; Safe= safeguarded; RE= Recreation]

<table>
<thead>
<tr>
<th>Site name</th>
<th>Settlement area</th>
<th>Proposed allocation 2016 (policy number)?</th>
<th>Issues and Options reference number 2013</th>
<th>Use</th>
<th>Housing capacity</th>
<th>European biodiversity site</th>
<th>SSSI or LNR</th>
<th>Key employment site</th>
<th>Flood risk</th>
<th>Surface water flood risk</th>
<th>Healthcare facility</th>
<th>Recreation facility</th>
<th>Town/District/Local centre or shop</th>
<th>Primary school</th>
<th>Historic Parks / Gardens</th>
<th>Scheduled Ancient Monument</th>
<th>Area of Archaeological Potential</th>
<th>Listed building</th>
<th>Size of site</th>
<th>High quality agricultural land</th>
<th>AONB</th>
<th>Previously developed land</th>
<th>A road</th>
<th>Railway station</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land at Home Farm, Effingham</td>
<td>Albury</td>
<td>A48</td>
<td>89</td>
<td>G&amp;T</td>
<td>6 pitches</td>
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<tr>
<td>Land north east of Spoil Lane, Tongham</td>
<td>Ash and Tongham urban area</td>
<td>A31</td>
<td>125</td>
<td>Allot</td>
<td>0</td>
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<tr>
<td>Lakeview, Lakeside Road, Ash Vale</td>
<td>Ash and Tongham urban area</td>
<td>A54</td>
<td>88</td>
<td>G&amp;T</td>
<td>4 pitches</td>
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<tr>
<td>Land to the east of White Lane, Ash Green</td>
<td>Ash and Tongham urban area</td>
<td>A28</td>
<td>78</td>
<td>29</td>
<td>H</td>
<td>62</td>
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<tr>
<td>Land to the south and east of Ash and Tongham</td>
<td>Ash and Tongham urban area</td>
<td>A29</td>
<td>56</td>
<td>H</td>
<td>1200</td>
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<tr>
<td>Lysons Avenue Station Road</td>
<td>Ash and Tongham urban area</td>
<td>20</td>
<td>E</td>
<td>20</td>
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<tr>
<td>Enterprise Industrial Estate, Station Road West</td>
<td>Ash and Tongham urban area</td>
<td>21</td>
<td>E</td>
<td>21</td>
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<tr>
<td>Site name</td>
<td>Settlement area</td>
<td>Proposed allocation 2016 (policy number)?</td>
<td>Draft Plan policy number (2014)</td>
<td>Issues and Options reference number (2013)</td>
<td>Use</td>
<td>Housing capacity</td>
<td>European biodiversity site</td>
<td>SSSI</td>
<td>SNCI or LNR</td>
<td>Key employment site</td>
<td>Flood risk</td>
<td>Surface water flood risk</td>
<td>Healthcare facility</td>
<td>Recreation facility</td>
<td>Town/District/Local centre or shop</td>
<td>Primary school</td>
<td>Secondary school</td>
<td>Historic Parks / Garden</td>
<td>Scheduled Ancient Monument</td>
<td>Area of Archaeological Potential</td>
<td>Listed building</td>
<td>Size of site</td>
<td>High quality agricultural land</td>
<td>AONB</td>
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<td>Draft Plan policy number (2014)</td>
<td>Issues and Options reference number (2013)</td>
<td>Use</td>
<td>Housing capacity</td>
<td>European biodiversity site</td>
<td>SNIC or LNR</td>
<td>Key employment site</td>
<td>Flood risk</td>
<td>Healthcare facility</td>
<td>Recreation facility</td>
<td>Town/District/Locality centre or shop</td>
<td>Primary school</td>
<td>Secondary school</td>
<td>Historic Parks / Garden</td>
<td>Scheduled Ancient Monument</td>
<td>AoBM</td>
<td>Area of Archeological Potential</td>
<td>Listed building</td>
<td>Size of site</td>
<td>High quality agricultural land</td>
<td>AONB</td>
<td>Previously developed land</td>
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<td>Proposed allocation 2016 (policy number)?</td>
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<td>Use</td>
<td>Housing capacity</td>
<td>European biodiversity site</td>
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<td>Surface water flood risk</td>
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<td>Town/District/Local centre or shop</td>
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<td>Listed building</td>
<td>Size of site</td>
<td>High quality agricultural land</td>
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<tr>
<td>Land at Liddington Hall, Aldershot Road</td>
<td>Fairlands</td>
<td>62</td>
<td>65</td>
<td>H</td>
<td>625</td>
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<td>Site name</td>
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<td>Proposed allocation 2016 (policy number)?</td>
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<td>Issues and Options reference number (2013)</td>
<td>Use</td>
<td>Housing capacity</td>
<td>European biodiversity site</td>
<td>SSSI</td>
<td>SNCI or LNR</td>
<td>Key employment site</td>
<td>Flood risk</td>
<td>Surface water flood risk</td>
<td>Healthcare facility</td>
<td>Recreation facility</td>
<td>Town/District/Local centre or shop</td>
<td>Primary school</td>
<td>Secondary school</td>
<td>Historic Parks / Garden</td>
<td>Scheduled Ancient Monument</td>
<td>Area of Archaeological Potential</td>
<td>Listed building</td>
<td>Size of site</td>
<td>High quality agricultural land</td>
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<td>The Orchard, Puttenham (land adjoining Wancom)</td>
<td>Puttenham</td>
<td>A55</td>
<td>94</td>
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<td>2</td>
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<td>A57</td>
<td>G&amp;T</td>
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<td>Land at the rear of the Talbot, Ripley</td>
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<td>Land to the west of Ripley</td>
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<td>Use</td>
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<td>Land around Burnt Common warehouse, London Road</td>
<td>Send</td>
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<td>B12 (Part of Potential Major Development Area / PDMA) - Send Marsh and Burntcommon</td>
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<td>Land around Burnt Common warehouse, London Road</td>
<td>Send Marsh</td>
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<tr>
<td>Land to the north of Send Marsh Road, Send Marsh</td>
<td>Send Marsh</td>
<td>120</td>
<td>Safe</td>
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<td>Aldertons Farm SANG</td>
<td>Send Marsh</td>
<td>106</td>
<td>SANG</td>
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<td>Site name</td>
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<td>Proposed allocation 2016 (policy number)?</td>
<td>Draft Plan policy number (2014)</td>
<td>Issues and Options reference number (2013)</td>
<td>Use</td>
<td>Housing capacity</td>
<td>European biodiversity site</td>
<td>SSSI</td>
<td>SNCI or LNR</td>
<td>Key employment site</td>
<td>Flood risk</td>
<td>Healthcare facility</td>
<td>Recreation facility</td>
<td>Town/District/Local centre or shop</td>
<td>Secondary school</td>
<td>Historic Parks / Garden</td>
<td>Scheduled Ancient Monument</td>
<td>Area of Archaeological Potential</td>
<td>Listed building</td>
<td>Size of site</td>
<td>High quality agricultural land</td>
<td>AONB</td>
<td>Previously developed land</td>
<td>A road</td>
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<tr>
<td>Valley Park Equestrian, East Shalford Lane, Shalford</td>
<td>Shalford</td>
<td>A56</td>
<td>93</td>
<td>G&amp;T</td>
<td></td>
<td>5 pitches</td>
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<tr>
<td>Broadford Business Park, Shalford</td>
<td>Shalford</td>
<td>A34</td>
<td>81</td>
<td>H</td>
<td>100</td>
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<tr>
<td>Mount Browne, Sandy Lane, Guildford (Surrey Police HQ)</td>
<td>Shalford</td>
<td>A32</td>
<td>82</td>
<td>23</td>
<td>H</td>
<td>116</td>
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<tr>
<td>Extension of Peasmarsh Industrial, Old Portsmouth Road</td>
<td>Shalford</td>
<td>A32</td>
<td>60</td>
<td>E</td>
<td>60</td>
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<tr>
<td>Land to the east of Shalford, adjoining Chinthurst Lane</td>
<td>Shalford</td>
<td></td>
<td>53</td>
<td>H</td>
<td>53</td>
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<tr>
<td>Land south of New Pond Road, adjoining Farncombe</td>
<td>Shalford</td>
<td></td>
<td>80</td>
<td>H</td>
<td>100</td>
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<tr>
<td>Land to the south of Clandon station and north of Meadowlands, West Clandon</td>
<td>West Clandon</td>
<td>77</td>
<td>ED</td>
<td>0</td>
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<td>Land to the east of Shere Road</td>
<td>West Clandon</td>
<td>55</td>
<td>H</td>
<td>55</td>
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<tr>
<td>Land to the north east of Guildford - Gosden Hill Farm, Merrow</td>
<td>West Clandon</td>
<td>111</td>
<td>SANG</td>
<td>0</td>
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<tr>
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<td>West Horsley</td>
<td>A41</td>
<td>H</td>
<td>90</td>
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<tr>
<td>Land near Horsley Railway Station, Ockham Road North, West Horsley</td>
<td>West Horsley</td>
<td>A39</td>
<td>72</td>
<td>H</td>
<td>100</td>
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<td>Land to the north of West Horsley</td>
<td>West Horsley</td>
<td>A40</td>
<td>70</td>
<td>39</td>
<td>H</td>
<td>120</td>
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<tr>
<td>Land to the west of West Horsley</td>
<td>West Horsley</td>
<td>A38</td>
<td>71</td>
<td>40</td>
<td>H</td>
<td>135</td>
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<tr>
<td>Bell and Colvill</td>
<td>West Horsley</td>
<td>A37</td>
<td>40</td>
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<td>Site name</td>
<td>Settlement area</td>
<td>Proposed allocation 2016 (policy number)</td>
<td>Draft Plan policy number (2014)</td>
<td>Issues and Options reference number (2013)</td>
<td>Use</td>
<td>Housing capacity</td>
<td>European biodiversity site</td>
<td>SSSI</td>
<td>SNCI or LNR</td>
<td>Key employment site</td>
<td>Flood risk</td>
<td>Surface water flood risk</td>
<td>Healthcare facility</td>
<td>Recreation facility</td>
<td>Town/District/Local centre or shop</td>
<td>Primary school</td>
<td>Secondary school</td>
<td>Historic Parks / Garden</td>
<td>Scheduled Ancient Monument</td>
<td>Area of Archaeological Potential</td>
<td>Listed building</td>
<td>Size of site</td>
<td>High quality agricultural land</td>
<td>AONB</td>
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APPENDIX V - SPATIAL STRATEGY ALTERNATIVES

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

The alternatives (in summary) are as follows -

<table>
<thead>
<tr>
<th>Option</th>
<th>Quantum</th>
<th>Distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>OAN</td>
<td>Low growth option everywhere except at the ‘Send amber sites’, where there is medium growth</td>
</tr>
<tr>
<td>2</td>
<td>OAN + 3%</td>
<td>Low growth option everywhere except at the ‘Send amber sites’, where there is high growth</td>
</tr>
<tr>
<td>3</td>
<td>OAN + 12%</td>
<td>High growth option everywhere except Wisley Airfield and Clandon Golf</td>
</tr>
<tr>
<td>4</td>
<td>OAN + 14%</td>
<td>High growth at Wisley Airfield enables the low growth elsewhere.</td>
</tr>
<tr>
<td>5</td>
<td>OAN + 18%</td>
<td>As per (4), but with high growth at the Send amber sites.</td>
</tr>
<tr>
<td>6</td>
<td>OAN + 27%</td>
<td>High growth at all locations except Clandon Golf</td>
</tr>
<tr>
<td>7</td>
<td>OAN + 30%</td>
<td>High growth at all locations except Liddington Hall</td>
</tr>
<tr>
<td>8</td>
<td>OAN + 34%</td>
<td>High growth at all locations</td>
</tr>
</tbody>
</table>

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

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

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

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

Considerable assumptions are made regarding infrastructure delivery, i.e. assumptions are made regarding the infrastructure (of all types) that will come forward in the future alongside (and to some extent funded through) development. Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.
Appraisal findings

Appraisal findings are presented below within 18 separate tables (each table dealing with a specific sustainability objective) with a final table drawing conclusions.

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

### Conserve and enhance biodiversity and the natural environment

<table>
<thead>
<tr>
<th></th>
<th>Option 1</th>
<th>Option 2</th>
<th>Option 3</th>
<th>Option 4</th>
<th>Option 5</th>
<th>Option 6</th>
<th>Option 7</th>
<th>Option 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rank</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>5</td>
<td>6</td>
<td>6</td>
<td>8</td>
</tr>
<tr>
<td>Significant effects?</td>
<td>Yes</td>
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**Discussion**

A primary consideration is the need to avoid the risk of impacts to the internationally important Thames Basin Heaths Special Protection Area (SPA); however, there is also a need to consider impacts to areas designated as being of national importance (Sites of Special Scientific Interest, SSSIs) and local importance (Sites of Nature Conservation Importance, SNCIs). Furthermore, there is a need to consider the potential for impacts to non-designated habitats that contribute to ecological connectivity at the landscape scale, and more generally ‘green infrastructure’ locally. With regards to non-designated habitat, evidence-base is limited; however, the location of broad Biodiversity Opportunity Areas (BOAs) is known.

In light of these points, the relative merits of the alternatives are as follows:

- **Option 1** would involve the least ‘land take’ and hence is clearly best performing from a biodiversity perspective; and the one site (a 100 home scheme north of Send Marsh) delivered under this option, that is not a constant across all option, does not give rise to concerns (from a strategic perspective). However, there remains the potential for significant negative effects, recognising that development at the locations that are a ‘given’ - i.e. assumed under all options, including Option 1 - will involve significant loss of greenfield land in sensitive locations, notably:
  - Blackwell Farm sits within the Wanborough and Normandy Woods and Meadows (WNWM) BOA and borders Broadstreet Common SNCI;
  - Gosden Hill sits within the Clandon to Bookham Parkland BOA and borders two SNCIs (Merrow Lane Woodland; and Cotts Wood);
  - Normandy/Flexford sits within the WNWM BOA and contains ancient woodland;
  - Keens Lane partially intersects the 400m SPA buffer;
  - sites at the Horsleys sit within the Clandon to Bookham Parkland BOA and two border the Lollesworth Wood SNCI;
  - the two sites at Ash Green are within the WNWM BOA, border ancient woodland and in one case borders the Ash Green Wood SNCI;
  - the small site supported to the southeast of Flexford sits within the WNWM BOA and would result in the loss of the Little Flexford SNCI; and
  - the mixed use site at Send Marsh / Burnt Common includes two small patches of ancient woodland, and also a stream that forms part of the River Wey (plus tributaries) BOA.

- **Option 2** gives rise to limited concerns over-and-above Option 1. Most notably, a stream runs along the edge of one of the two additional sites supported at Send Marsh (the northern site within the ‘triangle’). This stream is identified (along with a buffer either side) as forming part of the River Wey (plus tributaries) BOA.

- **Option 3** gives rise to notable concerns over-and-above Option 2. Whilst both additional
sites – i.e. Liddington Hall and the additional extension to Tongham - border an SNCI, neither falls within a BOA. Liddington hall is notable for bordering an SNCI (Broadstreet Common) along a considerable portion of its boundary, and also for being within possible walking distance (but well outside the 400m buffer) of the Thames Basin Heaths SPA.

- Option 4 gives rise to concerns, as Wisley Airfield is constrained from a biodiversity perspective – given that parts are adjacent to the SPA and also that the majority is classified as an SNCI - however, there are mitigating factors. Most notably, there is a commitment to use the northern part of the site (i.e. that part that falls within the 400m SPA buffer) for Suitable Alternative Natural Greenspace (SANG), in order to minimise recreational impacts to the SPA. Also, there is some uncertainty regarding the role of the SNCI plays, in terms of ecological networks locally (as the findings of survey and review work are awaited).

- Option 5 gives rise to limited concerns over-and-above Option 4 (see discussion of the issues associated with the three Send Marsh sites, under Options 1 and 2).

- Option 6 gives rise to notable concerns over-and-above Option 5 (see discussion of the issues associated with the additional extension to Tongham, and the issues associated with Liddington Hall, under Option 3).

- Option 7 gives rise to notable concerns over-and-above Option 5, as this option would involve allocation of Clandon Golf (albeit Liddington Hall would not be allocated), which is somewhat constrained on the basis that more than 50% of the site borders an SNCI (in fact three separate SNCIs, all falling within the North Downs Scarp and Dip BOA). It is noted that Clandon Golf is relatively distant from the SPA; however, the site would intersect the 5km SPA buffer (and hence mitigation would be necessary).

- Option 8 gives rise to notable concerns over-and-above Option 7 (see discussion of the issues associated with Liddington Hall, under Option 3).

In conclusion, the degree of impact increases in-line with the quantum of growth / number of sites supported, with one exception - namely it is not possible to differentiate between Option 6 (High growth at all locations except Clandon Golf) and Option 7 (High growth at all locations except Liddington Hall). It is also possible to conclude that there is something of a ‘jump’ in the degree of impact between Option 3 (High growth option everywhere except Wisley Airfield and Clandon Golf) and Option 4 (High growth at Wisley Airfield enables the low growth elsewhere), recognising that Wisley Airfield stands out as more constrained than other sites in contention.

With regard to effect significance, it is appropriate to conclude that all options would lead to significant negative effects. It might be suggested that low growth (e.g. Option 1), or any Option not involving Wisley Airfield (i.e. Option 1, 2 or 3), would avoid significant negative effects; however, it is not clear that this is the case given the extent of biodiversity sensitivities. It is not even clear that planning for ‘below OAN’ (i.e. a level of growth dismissed as unreasonable, and not reflected in the alternatives) would enable significant negative effects to be avoided, given that unmet needs would have to be met elsewhere in the HMA (or further afield in the Surrey vicinity), where broadly equivalent biodiversity sensitivities are to be found.

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The northern part of the site is an SNCI. The southern part of the site, which is not an SNCI, is that part of the site that has been added since the time of the 2014 consultation.
Mitigate climate change through reducing emissions of greenhouse gases

<table>
<thead>
<tr>
<th>Rank</th>
<th>Significant effects?</th>
<th>Option 1</th>
<th>Option 2</th>
<th>Option 3</th>
<th>Option 4</th>
<th>Option 5</th>
<th>Option 6</th>
<th>Option 7</th>
<th>Option 8</th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>OAN</td>
<td>OAN + 3%</td>
<td>OAN + 12%</td>
<td>OAN + 14%</td>
<td>OAN + 18%</td>
<td>OAN + 27%</td>
<td>OAN + 30%</td>
<td>OAN + 34%</td>
</tr>
</tbody>
</table>

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 potential for new development to incorporate low carbon / renewable energy infrastructure (district heating, in the Guildford context), and achieve high standards of sustainable design/construction, is linked to a number of factors, which enables differentiation of the spatial strategy alternatives. Specifically, the scale, mix and density of a scheme has a bearing, and the potential to deliver district heating is also enhanced where a scheme is located close to a source of heat. The Council has established that district heating options should be explored at: residential only developments of at least 50 dwellings per hectare and/or 300 dwellings; (b) residential only developments of 35 dwellings per hectare or above located near a source of heat (or an existing district heating scheme that can be tapped into); and (c) mixed developments of 50 dwellings or more that include either two or more non-residential uses or a single use that would generate significant heat.

In light of these points, the relative merits of the alternatives are as follows:

- Under Option 1 the average size of schemes would be relatively low (particularly given no development at Wisley Airfield scheme), and the one site (a 100 home scheme north of Send Marsh) delivered under this option, that is not a constant across all option, would likely not give rise to any opportunities. With regards to development at the locations that are a ‘given’ - i.e. assumed under all options, including Option 1 – some points to note include:
  - Development within Guildford Town Centre and the Guildford Urban Area will capitalise on particular opportunities established by the Guildford Renewable Energy Mapping Study. Specifically, the study identified five ‘heat priority areas’ focused on Central Guildford, the Royal Surrey County Hospital and University of Surrey’s Stag Hill Campus and adjacent industrial estates.
  - The scale of development at the two major urban extensions to Guildford – Blackwell Farm and Gosden Hill – gives rise to considerable opportunity (to achieve high standards of sustainable design and construction, and deliver a high quality district heating scheme). The Blackwell Farm site is located close to a heat priority area; however, it is unlikely to be the case that this results in particular opportunity.
  - Similarly, the scale of development at Normandy/Flexford and at the 400 home Send Marsh scheme (which also benefits from being mixed use) will give rise to opportunity.

- Option 2 gives rise to notable opportunity over-and-above Option 1, as the two additional sites supported are adjacent (together comprising a triangle of land to the west of Send Marsh), hence it is fair to assume that a delivery of a district heating network could be coordinated across the two sites (albeit the two sites are in separate land ownership).

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

Option 3 gives rise to notable opportunity over-and-above Option 2, as Liddington Hall and the additional extension to Tongham would both be large enough (c.600 homes) to deliver a high quality district heating scheme. It is also noted that another large allocation is adjacent, hence it is fair to assume that a delivery of a district heating network could be coordinated across the two sites (albeit the two sites are in separate land ownership).

Option 4 performs well, as the average size of schemes would be relatively high, a scheme at Wisley Airfield. There should be the potential to deliver an ambitious district heating scheme as part of a 2,100 home scheme, albeit there is uncertainty given competing funding priorities.

Option 5 arguably gives rise to some opportunity over-and-above Option 4 (see discussion of the issues associated with the three Send Marsh sites, under Options 1 and 2).

Option 6 gives rise to notable opportunity over-and-above Option 5 (see discussion of the opportunity associated with the additional extension to Tongham, and the opportunity associated with Liddington Hall, under Option 3).

Option 7 perhaps gives rise to some opportunity over-and-above Option 6, as this option would involve allocation of Clandon Golf in place of Liddington Hall. Whilst both sites are well above the 300 home threshold identified by the Council, it is fair to assume that Clandon Golf could be associated with opportunity over-and-above Liddington Hall as it would involve 400 additional homes and would also be a mixed use scheme (beneficial, as heat demand is spread across the day).

Option 8 gives rise to notable opportunity over-and-above Option 7 (see discussion of the opportunity associated with Liddington Hall, under Option 3).

In conclusion, the potential to reduce average per capita CO₂ emissions from the built environment increases in-line with the quantum of growth / number of sites supported. This is because the additional sites that come into play, as the total quantum figure increases, tend to be large sites, where there will be good opportunity to achieve high standards of sustainable design and construction; and deliver a high quality district heating scheme.

With regard to effect significance, it is not possible to draw strong conclusions, recognising that climate change mitigation is a global issue.
The sustainability objective here is to “Create and sustain vibrant communities”, a broad objective that overlaps considerably with a number of other sustainability objectives including those relating to ‘Health’, ‘Housing’, ‘Poverty and social exclusion’, ‘Transport’, ‘Safety and security’ and ‘Rural economy’. Given the need to avoid overlap and repetition, it is appropriate to focus here on the matter of community infrastructure (capacity / access).

In light of these points, the relative merits of the alternatives are as follows:

- **Option 1** is a low growth option; however, a range of community infrastructure objectives would still be achieved through delivery of the strategic sites that are a ‘given’, i.e. assumed under all options, including Option 1. Notably (leaving aside matters associated with Guildford Town Centre), strategic community infrastructure will be delivered through development at –
  - Normandy/Flexford (a well located secondary school, to serve the west of the borough; a local centre, necessary as existing village services/facilities have experienced viability issues problems; a care home; travelling showpeople plots; a village green; extensive open space (SANG within c.1km); and strategic enhancements to bus / cycle networks).
  - Gosden Hill (a secondary school; a local centre; traveller pitches; extensive open space (SANG); and transport infrastructure that contributes to the Guildford Sustainable Movement Corridor, including a rail station).
  - Blackwell Farm (a local centre; traveller pitches; extensive open space (SANG); and transport infrastructure that contributes to the Guildford Sustainable Movement Corridor, helping to facilitate the new rail station, and increasing accessibility to key destinations including the Hospital).

However, Option 1 would give rise to challenges, particularly in relation to secondary school provision, given the absence of a second strategic scale scheme in the east of borough.

- **Option 2** gives rise to some concerns over-and-above Option 1, as the two additional sites supported are at Send Marsh, a location in the east of the borough without a local centre. The small local centre at Send would be 1-2km distant, and Ripley District Centre would be under 3km distant.

- **Option 3** gives rise to some concerns over-and-above Option 2, as the two additional sites supported - Liddington Hall and the additional extension to Tongham - would not be large enough (at c.600 homes) to deliver strategic community infrastructure (e.g. a local centre). However, it is noted that both are well-located in certain respect. Specific points are –
  - Liddington Hall is in proximity to several local centres in northwest Guildford, with Worplesdon Road, Stoughton within 400-800m (i.e. walking distance); and Guildford Town Centre would of course be accessible.
  - A southern extension to Tongham would be within easy walking distance of a small local centre, with higher order services/facilities accessible to the west in Aldershot (including a secondary school c.1.5km distance via an A331 walking/cycling underpass, and Aldershot Town Centre c.3.5km distant). Another large allocation is adjacent; however, fragmented land ownership would likely hinder delivery of strategic community infrastructure (i.e. there would be ‘piecemeal’ growth, an issue at Ash/Tongham).

- **Option 4** performs well, as a 2,100 home Wisley Airfield scheme would support the achievement of certain community infrastructure objectives, and equally delivery of the sites...
discussed above (i.e. three sites at Send Marsh, Liddington Hall and an extra southern extension to Tongham), each of which is non-ideal from a community infrastructure perspective, would not be necessary. In particular, a secondary school at Wisley Airfield would provide for sufficient school capacity for needs arising from the planned development of the site and, in combination with the school at Gosden Hill, provide for the additional educational need arising in the eastern part of the borough. Wisley Airfield is relatively remote from a town centre; however, Ripley District Centre would be c.1km of the edge of the site (albeit considerably more distant from the site's centre point).

- Option 5 gives rise to some concerns over-and-above Option 4 (as the three additional Send Marsh sites would not deliver strategic community infrastructure, and Send Marsh does not have a local centre – see discussion under Option 2).
- Option 6 gives rise to some concerns over-and-above Option 5 (see discussion of the issues associated with the additional extension to Tongham, and the issues associated with Liddington Hall, under Option 3).
- Option 7 gives rise to notable opportunity over-and-above Option 6, as Clandon Golf is significantly larger than Liddington Hall, resulting in an increased likelihood of strategic community infrastructure delivery. Notably, site promoters have proposed a secondary school and an extension to the adjacent Park and Ride. However, with regards to secondary school provision, Surrey County Council considers that a combination of secondary schools – one at Gosden Hill and one at Wisley airfield - is preferable to one at Clandon Golf.
- Option 8 gives rise to some concerns over-and-above Option 7 (see discussion of the issues associated with Liddington Hall, under Option 3).

In conclusion, Options 4 and 7 are best performing as there will be a focus at strategic-scale schemes, each able to deliver a local centre and other strategic community infrastructure, and there will be a clear strategy in place for secondary school provision. Under Option 7 there is some uncertainty regarding precisely what the strategy for secondary school provision would involve, as there would be three sites in the east of the borough each able to deliver a secondary school, but there can be certainty that a strategy could be established.

The worst performing option is Option 2, as high growth at Send is not to be supported from a communities perspective, particularly if it is the case that there is a risk of a shortfall in secondary school provision in the east of the borough. Other options are more challenging to differentiate with any certainty.

With regard to effect significance, it is possible to conclude that the best performing options would result in significant positive effects, particularly given the potential to deliver new secondary school provision; whilst the worst performing option would result in significant negative effects, particularly given new secondary school provision issues.
Maintain Guildford borough and Guildford town’s competitive economic role

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

The primary source of evidence is the West Surrey Strategic Housing Market Assessment (SHMA), which gives consideration to the question of whether a quantum of housing should be delivered over-and-above that needed to meet demographic needs (517 dpa), in order to meet economic growth objectives (i.e. ensure sufficient local workforce, given employment growth forecasts and a need to avoid unsustainable commuting). Ultimately, the conclusion reached is that there is a need for an economic ‘uplift’, i.e. the Guildford OAN figure of 693 dpa, that is a main output of the SHMA, does reflect an economic uplift.

The SHMA is clear that “[h]ousing provision below [OAN] could potentially constrain economic growth locally”, given that there is little or no potential to reduce out-commuting (“given economic and housing market dynamics in the area and its relationship to London we do not consider that any substantive clawback of out-commuting would be realistic”). As such, any option that would result in a risk of not delivering OAN over the plan period performs poorly from a perspective of wishing to capitalise on economic growth opportunities.

With regards to the question of whether delivering above OAN is an option with merit, from an economic perspective, the main point to make is that there is merit on the basis that Woking is set to ‘under-supply’ housing – i.e. not meet its OAN figure, as established by the SHMA – and hence there is set to be an under-supply of housing at the wider Housing Market Area (HMA) scale. The quote used above (“Housing provision below [OAN] could potentially constrain economic growth locally”) relates to the HMA rather than Guildford Borough specifically.

It might also be suggested that delivering above the OAN figure could provide for a useful contingency, should it transpire that the economic growth forecasts used as the basis for establishing OAN were conservative; however, it is not clear that this an argument holds sway. The authors of the SHMA were able to draw on recent studies examining three workforce employment forecasts, before arriving at a best fit forecast for Guildford and Woking. For Guildford the forecasts indicate that workplace employment is anticipated to grow by between 0.6% and 1.1% per annum; whilst for Woking the forecasts indicate that workplace employment is anticipated to grow by between 0.6% and 1% per annum. For Waverley, three scenarios were considered that result in more markedly different results (employment growth of between 0.2% and 1% per annum); however, this in itself does not give cause for concern.

In conclusion, higher growth options are to be supported given the likelihood of housing undersupply within the HMA, which is also a functional economic market area.

With regard to effect significance, it is fair to conclude that Option 8 would result in significant positive effects as there would be certainty of OAN being met within HMA, and therefore economic opportunities realised within the sub-regional Functional Economic Market Area (FEMA). Equally, Options 1 – 4 would result in significant negative effects as OAN would not be met within the HMA (on the assumption that Waverley is not likely to meet all of Woking’s unmet housing need), and hence economic opportunities not realised within the FEMA.
Facilitate appropriate employment development opportunities to meet changing needs

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

In light of these points, the relative merits of the alternatives are as follows:

- **Option 1** is a low growth option, that would result in a shortfall of employment floorspace. New floorspace would be delivered at sites that are a ‘given’, i.e. assumed under all options, including Option 1 (specifically, 47,000m² floorspace will be delivered across the Blackwell Farm and Gosden Hill sites; 3,000 m² will be delivered in Guildford Town Centre; 8,500m² within the Guildford Urban Area; and 7,000m² as part of a smaller mixed use scheme at Send Marsh); however, there would be a 4,300m² shortfall (in the absence of a Wisley Airfield scheme).

- **Option 2** gives rise to some concerns over-and-above Option 1, as the two additional sites supported at Send Marsh would not be likely to deliver employment floorspace. One of the sites in question has been promoted as mixed use in the past; however, there can be no certainty that it would deliver employment under this current scenario, which would involve a mixed-use scheme virtually adjacent (7,000m² employment floorspace). The risk under this option, and other options discussed below, is that there would be insufficient local employment opportunities for the borough's resident workforce, leading to unemployment and/or unsustainable out-commuting. It is recognised that residents of the additional housing developments at Send Marsh would live in very close proximity to employment opportunities; however, this is a more minor consideration (i.e. there is a need to consider access to employment at the wider scale, recognising that people will commute to work).

- **Option 3** gives rise to notable concerns over-and-above Option 1, as the two additional sites - Liddington Hall and the additional extension to Tongham - would not deliver employment floorspace. Again, the risk is that there would be an imbalance between the size of the local workforce and the number of job opportunities, leading to unemployment and/or unsustainable out-commuting. It is recognised that Liddington Hall is in close proximity to employment growth areas within and around Guildford, and that residents of Tongham will often ‘look west’ towards employment growth areas in the Blackwater Valley; however, there is a need to take these as more minor considerations, for the purposes of appraisal.

- **Option 4** performs well, as a 2,100 home Wisley Airfield scheme would deliver 4,300m² employment floorspace, thereby enabling the Council to deliver on its target (as established by Employment Land Needs Assessment, ELNA). Wisley Airfield’s location on the A3 makes it a viable location for employment growth, albeit it is recognised that its more rural location means that it is less functionally linked to a growth town (i.e. Guildford or Woking) and that the workforce may need to commute relatively far (on average) to reach the site.

- **Option 5** gives rise to some concerns over-and-above Option 4 (as the three additional Send Marsh sites would not deliver employment floorspace).

- **Option 6** gives rise to some concerns over-and-above Option 5 (as neither the additional extension to Tongham, nor Liddington Hall, would deliver employment floorspace).
• Option 7 gives rise to opportunity over-and-above Option 6, as Clandon Golf would deliver additional employment land (assumed to be viable, despite its location away from the A3). It is fair to assume that higher housing growth aligned with higher employment growth is to be supported at Guildford (given the town’s designation as one of the four ‘Growth Towns’ within the ‘Enterprise M3’ Local Enterprise Partnership’s area); however, it is recognised that higher growth gives would give rise to issues of traffic congestion (plus other issues beyond), which in turn would have a bearing on economic activity.

• Option 8 gives rise to some concerns over-and-above Option 7 (see discussion of the issues associated with Liddington Hall, under Option 3).

In conclusion, 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 other considerations aside). 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.

With regard to significance, Options 4 and 7 would lead to significant positive effects as established economic growth targets/objectives would be realised whilst; whilst Options 1-3 would lead to significant negative effects on the basis of the contrary argument.
Reduce the risk of flooding and the resulting detriment to the public... the economy and the environment

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**Significant effects?**

No

**Discussion**

Flood risk in the borough is primarily associated with the floodplain of the River Wey, which passes through the centre of Guildford Town, and does not impinge on any of the sites that are ‘variables’ across the alternatives.

Of the sites that are a focus of this current appraisal, the only points to note are that streams run along the edge of one of the Send Marsh sites (Options 2, 3, 5, 6, 7, 8) and similarly a stream runs along the edge of the Wisley Airfield site (Options 4-8). In neither case is it likely that flood risk will be an issue in practice, as there will be the potential to leave areas at flood risk as open space.

*In conclusion*, it is not possible to differentiate the alternatives.

With regard to effect **significance**, none of the options are predicted to result in significant effects. Whilst it is the case that the flood risk zone does impinge on a number of the sites that are a ‘given’ under all of the options, those sites are supported on the basis of having passed through ‘the sequential test’, i.e. it has been determined that there is no potential to meet needs at alternative locations (after having taken into account potential for mitigation). Notably, a sequential approach to flood risk management has meant the need to limit growth in the Guildford Town Centre to some extent.
Facilitate improved health and well-being of the population, including... reducing inequalities in health

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**Significant effects?**

No

### Discussion

The sustainability objective here is to "Facilitate improved health and well-being of the population, including enabling people to stay independent and reducing inequalities in health", 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:

a. Access to a GP surgery – All of the sites that are a focus of this appraisal (i.e. are a variable across the alternatives) 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.

b. Royal Surrey County Hospital - Whilst an aim of the plan is to support the functioning of the Hospital the alternatives currently under consideration have little or no bearing. Whilst Blackwell Farm is supported by the Hospital, it is a constant across the alternatives.

c. Health deprivation – Whilst the Index of Multiple Deprivation (IMD) ‘Health and Disability’ domain dataset shows there to be some notable concentrations of poor health, there is little spatial correlation with the sites that are a focus here.

d. Active travel – It might be suggested that sites on the edge of Guildford (e.g. Liddington Hall and Clandon Golf) would support walking/cycling to reach employment, services, facilities etc, whilst Wisley Airfield stands out as performing poorly in this respect; however, there is little certainty. All sites would support access to high quality countryside, and all strategic scale schemes would ensure access to high quality open space, in the form of SANG (with Wisley Airfield standing out as performing well in this respect, as its proximity to the SPA means that it must deliver enhanced SANG).

e. Air quality – There are no designated air quality management areas (AQMAs) within Guildford Borough, and whilst there are recognised air quality issues at Guildford Town Centre and Wisley, it is not possible to conclude that any option leads to impacts.

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).

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63 For example, the GP surgery at Send is at the southern extent of the village, potentially within walking distance of the two larger site options at Send Marsh (Options 2, 3, 5, 6, 7, 8); residents at a south Tongham extension (Options 3, 6, 7, 8) would be c. 1.5 km from a GP surgery in Aldershot (accessible by walking/cycling via an A331 underpass), with a proposed new GP surgery at Ash/Tongham closer (potentially under 1km); and there is a strong commitment to deliver a new GP surgery as part of a strategic scheme at Wisley Airfield (as evidenced by the recent planning application, and more recent discussion with the developers). Residents of Wisley Airfield would also be within c.3 - 3.5km of a GP surgery at East Horsley (understood to have capacity to expand).

64 Perhaps most notably, a southern extension to Tongham would be in proximity to an area of relative deprivation. It might be suggested that there is an argument to avoid growth that would put additional strain on local services/facilities (e.g. GP capacity); however, there is not a strong case to be made. The site is not adjacent to the area of relative deprivation, and the area of relative deprivation is not within the bottom performing 20% of areas within Guildford (rather, it is within the second ‘quintile’).

65 It is not possible to establish which sites could increase car movements through air pollution hotspots within Guildford Town Centre.

66 A recent report: www2.guildford.gov.uk/councilmeetings/documents/s4684/Item%2006%20-%20Air%20Quality%20-%20Background%20Information%20for%20the%20Scoping%20Document.pdf - shows NO₂ concentrations at Wisley to be above statutory limits and to have been increasing at a faster rate than at any of the other 14 monitoring locations within the borough (see figure on page 3 of the report). As such, there is a need to consider the possibility that a development at Wisley Airfield would result in sensitive receptors (particularly school children, recognising the proposal to deliver a secondary school) within an air pollution hotspot. However, it is not possible to draw strong conclusions without further investigation. A relatively small part of the site will be adjacent to the A3 (only the western extent, recognising that the northern part of the site must provide SANG), and even here it is fair to assume that there will be a landscape buffer that acts to ensure that residents (a school in this location being highly unlikely) are not at risk. Air pollution decreases quite rapidly away from the source, as evidenced by a review of the extent of designated air quality management areas elsewhere – see uk-air.defra.gov.uk/aqma/maps. For example, at Addlestone (north of Woking), where the M25 passes through a residential area, the AQMA extends c.50 either side of the motorway (albeit mitigation measures are likely in place).
Protect, enhance, and where appropriate make accessible... archaeological and historic environments...

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A primary consideration is the need to avoid impacts to listed buildings and their setting; conservation areas (within which there will typically be a concentration of listed buildings). Guildford has over 1,000 statutory listed buildings (as well as over 200 locally listed buildings), 40 conservation areas, eight historic parks and gardens (as well as 52 locally important parks and gardens) and 24 scheduled ancient monuments.

In light of these points, the relative merits of the alternatives are as follows:

- **Option 1** is a low growth option and hence is best performing (albeit in certain circumstances development can support the achievement of historic environment objectives); and the one site (a 100 home scheme north of Send Marsh) delivered under this option, that is not a constant across all option (specifically, it would not be delivered under Option 4), does not give rise to particular concerns. A listed building is located a short distance to the west and a cluster of listed buildings (surrounding a small common) is located a short distance to the east; however, it is not clear that there is the potential for impacts to setting, as there are buildings likely to provide screening.

- **Option 2** gives rise to some concerns over-and-above Option 1, most notably because the northern-most of the two additional sites (which together form a triangle of land between roads, to the west of Send Marsh) contains a listed building (New Barn Nurseries; grade 2 listed). Also, there is a cluster of listed buildings a short distance to the northwest, and given slightly rising land there is the possibility of impacts to setting.

- **Option 3** gives rise to some concerns over-and-above Option 2, most notably because the south of Tongham site would border six listed buildings (all grade 2) plus several locally listed buildings. Also, the Liddington Hall site borders one listed building.

- **Option 4** gives rise to concerns, as the Wisley Airfield site abuts the northern extent of the Ockham Conservation Area, although it is noted that there is only one listed building in this part of the conservation area (grade 2 listed). Also, another listed building is located close to the site’s south-eastern extent, at Martyr’s Green; and there is a likelihood of significant increases to traffic through the Ripley Green and Ockham Conservation Areas (the former being associated with a high concentration of listed buildings).

- **Option 5** gives rise to some concerns over-and-above Option 4 (see discussion of the issues associated with the three Send Marsh sites, under Options 1 and 2).

- **Option 6** gives rise to some concerns over-and-above Option 5 (see discussion of the issues associated with the additional extension to Tongham, and the issues associated with Liddington Hall, under Option 3).

- **Option 7** gives rise to some concerns over-and-above Option 5, as this option would involve allocation of Clandon Golf (in place of Liddington Hall), which is adjacent to Clandon Park (which contains listed buildings) and located on rising land. There is also a cluster of listed buildings c.350m to the west, which includes the Grade 2* listed Clandon Park Gate House, and West Clandon Conservation Area is located to the east (unlikely to be impacted).

- **Option 8** gives rise to some concerns over-and-above Option 7 (see discussion of the issues associated with Liddington Hall, under Option 3).

In conclusion, it is clear that Option 1 (lowest growth) is best performing, whilst Option 8 (highest growth) is worst performing. The degree of impact generally increases in-line with the quantum of growth / number of sites supported, although it is not possible to differentiate
Option 3 (higher growth at Send Marsh and an additional extension to the south of Tongham) and Option 4 (Wisley Airfield, but nil or low growth at other locations)

With regard to effect **significance**, it is not possible to conclude significant negative effects. The discussion above identifies the possibility of impacts to a very small proportion of the borough’s conservation areas and listed buildings. It is recognised that a number of the locations that are a constant across the alternatives will also impact (e.g. there are two conservation areas designated at the Horsleys, albeit away from proposed sites); however, it remains the case that a relatively small proportion of the borough’s assets will be impacted, and it is not possible to conclude that there will be in-combination effects (i.e. that the impact to historic character as a whole locally will be significantly greater than the sum of its parts).
Provide sufficient **housing**... taking into account local housing need...

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**Significant effects?**

| Yes | Yes |

In line with para. 47 of the National Planning Policy Framework (NPPF), local planning authorities should: “use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with [principles of sustainable development].” As such, a Strategic Housing Market Assessment (SHMA) study was completed for the housing market area (HMA), which comprises the three West Surrey authorities of Guildford, Woking and Waverley.

The SHMA established an objectively assessed housing need (OAN) figure for the HMA, and was also able to go a step further by establishing an OAN figure for each of the three component local authorities. The OAN figure is primarily a reflection of demographic projections, with upward adjustments made in order to deliver: economic growth (recognising limited capacity to support in-commuting); improved affordability; and student housing.

In light of these points, the relative merits of the alternatives are as follows:

- **Option 1** - With nil ‘buffer’ there would be a high risk of not delivering OAN, as there would be a relatively high reliance on large (‘strategic’) sites that are inherently at risk of delivering slower than anticipated (or, indeed, not delivering at all in the plan period).

- **Option 2** - Would put in place a small buffer, resulting in a slightly reduced risk of undersupply, relative to Option 1. Furthermore, this option benefits from an increased focus on smaller sites (at Send Marsh), which are likely to be deliverable in the early part of the plan period (an important matter, as there would otherwise be a dip in the housing trajectory in the early part of the plan period, given a reliance on strategic sites).

- **Option 3** - Would involve a significantly increased buffer, relative to Option 2, leading to a strong likelihood of providing for OAN over the plan period.

- **Option 4** - Would involve a slightly increased buffer, relative to Option 2; however, there would be an increased reliance on larger sites and hence there would be a likelihood of undersupply within the early part of the plan period.

- **Option 5** - Additional small sites at Send Marsh would reduce the risk of undersupply in the early part of the plan period, relative to Option 4. The buffer would increase beyond that needed to ensure that Guildford’s OAN can be met, meaning that land would be available to meet a proportion of unmet needs arising from elsewhere within the HMA.

N.B. Guildford Borough has not been formally asked by either of the two other authorities within the HMA to meet unmet needs arising from within their areas; however, it is apparent that there is a risk of undersupply in Woking; and it is not possible to assume that Waverley is better placed than Guildford to meet Woking’s unmet needs.

- **Options 6 and 7** - Would involve an increased buffer, and therefore land would be available to meet a higher proportion of Woking’s unmet needs.

- **Option 8** - Would involve an increased buffer, relative to Option 7, and therefore land would be available to meet a higher proportion of Woking’s unmet needs. Assuming that meeting Guildford’s own needs requires ‘OAN + 14%’, then planning for ‘OAN + 34%’ would mean planning to meet c.87% of Woking’s unmet need.67

In **conclusion**, higher growth options are to be supported, from a ‘housing’ perspective, given

67 Alternatively, there is an argument to suggest that Scenario 8 (OAN + 34%) would meet all of Woking’s unmet need. This is on the basis that under this scenario Guildford would not need a 14% (1,940) buffer, as there would be additional small sites delivered.
the importance of putting a buffer in place, in order to maximise the likelihood of Guildford delivering on its OAN figure, and given the likelihood of housing undersupply within the HMA.

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

With regard to effect **significance**, it is fair to conclude that Options 3-8 would result in significant positive effects as there would be certainty of OAN being met within HMA; whilst Options 1-2 would lead to significant negative effects on the basis of the contrary argument.
Minimise use of best and most versatile agricultural land and encourage contaminated land remediation

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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, it is important to be clear that this data-set is of a very low resolution (e.g. some relatively large villages are not even recognised as ‘urban’ on the map), and hence is not suitable for differentiating sites / site-specific alternatives at the borough-scale. Also, the dataset does not distinguish between ‘grade 3a’ and ‘grade 3b’, which is a notable omission given that the NPPF classifies ‘best and most versatile’ agricultural land as that which is either grade 1, grade 2 or grade 3a.

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

Also, there is the potential to undertake desk-top survey of specific sites, thereby reaching a conclusion on agricultural land quality (distinguishing between grade 3a and 3b), but without the certainty that comes from field survey. The Council has commissioned such a desk-top study of all site options that are relevant to this appraisal. Focusing firstly on the sites that are a ‘variable’ across the alternatives, desk-top study finds that -

- Small site to the north of Send (all options other than Option 4) = Grade 2 or 3a
- Sites to the west of Send (all options other than 1 and 4) = Grade 3b (most), 2 or 3a (east)
- Land south of Tongham - Grade 3b
- Liddington Hall - Grade 3b
- Clandon Golf - Grade 3a (most) and 3b (northwest)
- Wisley Airfield - The agricultural part of the site is primarily 3a and 3b, with some grade 2.

On this basis -

- Option 1 - performs well as it would involve the least amount of land-take; however, the one site (a 100 home scheme north of Send Marsh) delivered under this option, that is not a constant across all option (specifically, it would not be delivered under Option 4) is ‘best and most versatile’ (BMV) land.
- Option 2 - would involve additional loss of agricultural land, with some additional BMV loss.
- Option 3 - would involve additional loss of agricultural land; however, the additional land lost would not be BMV.
- Option 4 - would likely involve similar loss of agricultural land, given that c.30ha of the Wisley Airfield site comprises hard-standing.
- Option 5 - would involve additional loss of agricultural land, with some additional BMV loss (Send Marsh)
- Option 6 - would involve additional loss of agricultural land; however, the additional land lost would not be BMV (Liddington Hall and south of Tongham)
• Option 7 - would involve additional loss of agricultural land, and the additional land lost would be BMV (Clandon Golf)
• Option 8 - would involve additional loss of agricultural land; however, the additional land lost would not be BMV (Liddington Hall)

In conclusion, it is clear that Option 1 (lowest growth) is best performing, whilst Option 8 (highest growth) is worst performing. The degree of impact generally increases in-line with the quantum of growth / number of sites supported, although it is not possible to differentiate Option 3 and Option 4. Whilst Option 4 would involve additional housing, c.30ha would be on brownfield land at Wisley Airfield.

With regard to effect significance, it is difficult to conclude significant negative effects even taking into account the extent of agricultural land lost across the sites that are a ‘constant’. There will be significant loss of grade 3a land (i.e. BMV land), but very limited loss of higher quality grade 2 land and seemingly nil loss of grade 1 land. It is noted that a number of the major greenfield sites that are a constant will avoid loss of BMV, notably: Blackwell Farm predominantly is predominantly 3b; land around Ash and Tongham is predominantly grade 3b, with smaller areas of grade 3a and 2; and the Normandy/Flexford strategic site is seemingly a mix of 3a and 3b, possibly with some grade 4.
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**Discussion**

Landscape was a major consideration (i.e. ‘constraint’) taken into account by the Council when developing reasonable alternatives (see discussion in Chapter 6, above), recognising that there is a need to avoid greenfield development within the AONB (which covers the southern half of the borough) and avoid loss of Green Belt (which covers 89 per cent of the borough), in particular Green Belt that is high sensitivity (i.e. contributes to the nationally established Green Belt purposes). 64 Also, there is land adjacent to the AONB that is currently designated as an Area of Great Landscape Value (AGLV), and which is also a significant constraint (particularly given a commitment by Natural England to undertake an AONB boundary review, and given an independent study that has identified candidate sites within Guildford to add to the AONB). Finally, there is a need to recognise that all landscapes within Guildford will have an identified character, with varying degrees of importance and sensitivity. A landscape character assessment (LCA) study does examine all landscape parcels in Guildford; however, there is limited potential to draw upon it for the purposes of this current appraisal. The LCA to a large extent seeks to guide the direction of future change or evolution through development or management, by indicating sensitivities that should be considered, and providing the most positive opportunities for change and minimising negative impact.

In light of these points, the relative merits of the alternatives are as follows:

- Option 1 would involve the least ‘land take’ and hence is clearly best performing from a landscape perspective; and the one site (a 100 home scheme north of Send Marsh) delivered under this option, that is not a constant across all option, does not give rise to concerns (from a strategic perspective). Send Marsh falls within the Ockham and Clandon Woodland Rolling Countryside character area, which is an extensive area, with Send Marsh at its northern extent, identified as having ‘moderate’ condition and strength of character, in the Guildford Borough context. The LCA references Send Marsh only once, stating: “This looser, later form of dispersive development dilutes the more typical local character of the area, as within Send and Send Marsh.”

- Option 2 gives rise to some concerns over-and-above Option 1 - see discussion of Send Marsh above. All three sites at Send Marsh are amber-rated Green Belt, i.e. no more sensitive than other Green Belt locations under discussion here; however, there is another consideration - specifically, the need to maintain a landscape gap between Send and Guildford, given that the Gosden Hill scheme will extend Guildford in the direction of Send Marsh. In this light, Option 2 performs poorly

- Option 3 gives rise to notable concerns over-and-above Option 2, as Liddington Hall comprises red-rated Green Belt, and the ‘south of Tongham’ site comprises AGLV (plus the

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64 The Green Belt and Countryside Study (GBCS) assesses all Green Belt and countryside land beyond the Green Belt and identifies potential development areas (PDAs) that could potentially be developed should there be insufficient land within the urban areas, without harming the main purposes of the Green Belt. The purpose of this study was to identify a wide range of spatial options for subsequent consideration through the Local Plan process against a wider set of planning and sustainability considerations. The study consists of a number of volumes, but most relevant are: Volume II (and addendum), which identifies PDAs around the urban areas; Volume III, which identifies small-scale PDAs around the villages; and Volume V, which identifies major PDAs around villages, a potential new settlement at Wisley airfield and reconsiders Countryside beyond the Green Belt. The draft Local Plan (2014) treated all PDAs as reasonable options for development regardless of the extent to which the land parcel within which it sits scored against Green Belt purposes. However, following the feedback from consultation, the Council determined the need to give weight to the sensitivity of the Green Belt parcel within which each PDA is located. Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt.
GBBS has established that this land does serve some Green Belt purposes – medium sensitivity).

- Option 4 would involve more housing than Option 3, but would give rise to significantly fewer concerns as Wisley Airfield would be developed in place of sites at Send, Liddington Hall and Tongham. Wisley Airfield comprises amber-rated Green Belt; however, it cannot be considered particularly sensitive from a landscape perspective. The LCA (2007) references ‘intensification of use at Wisley Airfield’ as ‘force for change’, but gives little indication that development could impact on the Ockham and Clandon Woodland Rolling Countryside character area.

- Option 5 gives rise to limited concerns over-and-above Option 4 (see discussion of the issues associated with the three Send Marsh sites, under Options 1 and 2).

- Option 6 gives rise to significant concerns over-and-above Option 5 (see discussion of the issues associated with the additional extension to Tongham, and the issues associated with Liddington Hall, under Option 3).

- Option 7 gives rise to notable concerns over-and-above Option 5, as this option would involve allocation of Clandon Golf (albeit Liddington Hall would not be allocated), which comprises red-rated Green Belt and AGLV (and borders the AONB). Having said this, it is noted that the LCA does not reference this golf course as a particular asset within the Merrow and Clandon Wooded Chalk Downs character area, whilst it does reference nearby Guildford Golf Course (Merrow Downs) as characteristic.

- Option 8 gives rise to notable concerns over-and-above Option 7 (see discussion of the issues associated with Liddington Hall, under Option 3).

In conclusion, 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 (development at Wisley Airfield, negating the need to develop sites at Send, Liddington Hall and Tongham), despite Option 4 involving higher growth.

With regard to effect significance, it is appropriate to conclude that options impacting on AONB and/or AGLV would result in significant negative effects. It is recognised that sites that are a constant under all of the options would result in some impact to AGLV and AONB (Blackwell Farm) and loss of red-rated Green Belt (Normandy/Flexford); however, efforts have been made to limit impacts as far as possible. Notably, the extent of Blackwell Farm has been reduced since the 2014 Draft Plan proposal, in that the site now only intersects the AGLV to a very small extent (albeit development will necessitate widening of an access road through AGLV and AONB).
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’. This conclusion is reached recognising that the following issues do not enable differentiation of the alternatives -

- Whilst the Index of Multiple Deprivation (IMD) dataset shows there to be some areas of relative deprivation within Guildford, only one ‘output area’ (in the Park Barn / Westborough to the west of Guildford Town Centre) is within the bottom 20% of output areas nationally, and it is not clear that any of the greenfield allocations will directly support regeneration initiatives.64

- Whilst it is arguably the case that any option not involving a Wisley Airfield scheme would result in a Traveller pitch provision shortfall, it is possible that certain other options would not be able to meet the provision target. Whilst it is generally the case that larger schemes are best able to integrate Traveller pitches, there are exceptions (e.g. a small 40 home scheme at Send, which is a constant across the alternatives, will deliver Traveller pitches; albeit this is Council owned land).

In conclusion, it is not possible to differentiate the alternatives. With regard to effect significance, it is possible to conclude that any effects are likely to be relatively minor.
**Make the best use of previously developed land and existing buildings**

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**Significant effects?**

No

**Discussion**

Of the greenfield site options that are a focus of this current alternatives appraisal, it is only Wisley Airfield that is partially brownfield. As such, it is possible to conclude that options involving a Wisley Airfield scheme perform relatively well; however, this is a relatively minor issue and hence it is determined not appropriate to differentiate the alternatives solely on this basis.

In **conclusion**, it is not possible to differentiate the alternatives, nor is it possible to conclude on effect **significance**.
Enhance the borough’s rural economy

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Discussion

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

In conclusion, it is not possible to differentiate the alternatives, nor is it possible to conclude on effect significance.
### Create and maintain safer and more secure communities

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<td>N/a</td>
<td>This objective is <strong>not applicable</strong> to the current appraisal, given that the alternatives are concerned with creating new communities rather than redeveloping urban areas / regenerating existing communities. Whilst it is fair to say that new communities will enhance the vitality of adjacent/nearby communities, it is not possible to draw conclusions in relation to safety/security. Another issue locally is pedestrian, cyclist and road traffic; however, it is again not possible to draw strong conclusions (see additional discussion below, under ‘Transport’).</td>
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Traffic is a key issue locally, both on strategic and local roads (where a range of ‘hotspots’ have been identified); hence growth options must be scrutinised in terms of the potential to support modal shift (i.e. walking cycling and use of public transport, rather than reliance on the private car), minimise worsened traffic along key routes and at key junctions and deliver required upgrades to transport infrastructure.

Development of the sites that are a constant across the alternatives will act to support the achievement of transport objectives - most notably urban extensions to Guildford at Blackwell Farm and Gosden Hill, which will support delivery of two new rail stations and more generally a ‘sustainable movement corridor’ through Guildford. The question, therefore, is the extent to which each of the options that is a focus of appraisal here will support or hinder efforts.

In light of these points, the relative merits of the alternatives are as follows:

Option 1 - A low growth option and therefore performs well, given that Guildford is a constrained location (certainly in the regional context, and potentially in the sub-regional context; albeit it is recognised that parts of Waverley - including the Dunsfold Aerodrome site that is under consideration for significant growth - are not well connected).

Option 2 - Performs broadly on a par with Option 1, on the basis that Send Marsh is not particularly constrained from a transport perspective. It is perhaps worth noting that residents would have good opportunity to make use of the new Park and Ride facility, set to be delivered as part of the Gosden Hill scheme.

Option 3 - Performs worse than the two options already discussed. This is on the basis that there would be a step-change in total growth quantum (1,200 homes), and neither site is particularly well located from a perspective of wishing to encourage modal shift (e.g. Liddington Hall is located away from the Guildford Sustainable Movement Corridor).

Option 4 - Performs poorly, from a transport perspective, given Wisley Airfield’s relatively isolated location. It is recognised that the scale of the scheme would enable good potential to provide a high quality bus service in perpetuity and deliver some cycle route improvements to important destinations, and it is recognised that the orientation of the Guildford Sustainable Movement Corridor supports growth at Wisley; however, relatively high car dependency can still be anticipated. There is also the potential for this scheme to worsen traffic conditions on the Strategic Road Network which could affect road safety. However, there are planned upgrade works in the vicinity of the site.

Option 5 gives rise to limited concerns over-and-above Option 4 (see discussion of the issues associated with the three Send Marsh sites, under Options 1 and 2).

Option 6 gives rise to concerns over-and-above Option 5 (see discussion of the issues associated with the additional extension to Tongham, and the issues associated with Liddington Hall, under Option 3).

Option 7 performs better than Option 5, as Clandon Golf is probably to be preferred to Liddington Hall, from a transport perspective. The site is further from the Town Centre, and is not within the Sustainable Movement Corridor (as per Liddington Hall); however, there would be the potential to support and enhance the adjacent Park and Ride.

Option 8 gives rise to concerns over-and-above Option 7, on the basis that this is the highest
growth option and the location of the additional site that would be delivered (Liddington Hall) is not ideal, from a transport perspective.

In conclusion, the degree of impact increases in-line with the quantum of growth / number of sites supported, with two exceptions: 1) It is not possible to differentiate Options 1 and 2; and 2) Option 7 (Clandon Golf) performs better than Option 6 (Liddington Hall) despite involving higher growth (i.e. 400 additional homes).

With regard to effect significance, it is difficult to draw strong conclusions in the absence of detailed transport modelling evidence.70 There are previous transport assessments - most notably, the Options Growth Scenarios Transport Assessment Report (Surrey County Council, January 2014) (OGSTAR) - however, these do not enable strong conclusions to be drawn either. OGSTAR assessed a range of such growth scenarios, of which ‘Scenario 7’ was the highest growth option; however, this scenario did not bear close resemblance to any of the options considered here, and more-over it is not clear that transport infrastructure upgrades could not mitigate the impacts of OGSTAR Scenario 7. On balance, it is appropriate to conclude that scenarios involving a level of growth above the Council’s preferred option (i.e. Options 5-8) could potentially lead to significant negative effects, as necessary measures to mitigate impacts are currently unknown.

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70 A new Strategic Transport Assessment is currently being prepared by Surrey County Council.
### Reduce waste generation and achieve the sustainable management of waste

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<th>Significant effects?</th>
<th>Discussion</th>
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<tr>
<td></td>
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<td>This objective is <strong>not applicable</strong> to the current appraisal. It should be possible to manage waste sustainably under any reasonably foreseeable scenario.</td>
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**SA of the Guildford Borough Local Plan**
Maintain and improve the water quality… and achieve sustainable water resources management

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<td>OAN + 34%</td>
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Rank

<table>
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<th>Significant effects?</th>
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Water quality and resource issues locally are discussed within the Guildford borough ‘Environmental Sustainability and Climate Change study. The study explains that the South East is a region that experiences serious water stress, with the European Environment Agency classifying the South East and London among areas in the EU with the least available water per person. Furthermore, Thames Water’s Draft Water Management Plan 2015-2040 is clear that the situation could get worse, particularly given that the London zone deficit is predicted to increase from 35 to 367 megalitres per day; and also given increased water demand from bathing, watering of gardens and from cooling systems.

However, having made these points, it is not clear that it is possible to draw the conclusion that lower growth in Guildford is to be supported from a water resources perspective. This is on the basis that any unmet housing need will have to be met somewhere locally, and other authorities are constrained to an equal or similar extent.

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.

- There should be the potential to deal with surface water runoff through sustainable drainage systems, although it is perhaps worth highlighting the concentration of growth at Tongham that would occur under Options 3, 6, 7, 8.

- No major waste water infrastructure ‘pinch points’ are known of, albeit Thames Water have stated (through representations) in relation to a number of sites that: “We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.”

In conclusion, it is not possible to differentiate the alternatives; and with regard to effect significance, significant negative effects are not predicted.
### Summary spatial strategy alternatives appraisal findings

#### Rank of performance / categorisation of effects

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<tr>
<th>Topic</th>
<th>Option 1 OAN</th>
<th>Option 2 OAN + 3%</th>
<th>Option 3 OAN + 12%</th>
<th>Option 4 OAN + 14%</th>
<th>Option 5 OAN + 18%</th>
<th>Option 6 OAN + 27%</th>
<th>Option 7 OAN + 30%</th>
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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 the AONB and/or AGLV.

- Transport - Generally, the degree of impact increases in-line with the quantum of growth / number of sites supported, with two exceptions; notably, Option 7 (Clandon Golf) performs better than Option 6 (Liddington Hall). With regard to effect significance, it is difficult to draw strong conclusions in the absence of detailed transport modelling evidence (a new Strategic Transport Assessment is 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.