

Sustainability Appraisal (SA) of the Guildford Local Plan

SA Statement (also includes HRA Statement)

April 2019

REVISION SCHEDULE					
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1	April 2019	SA (and HRA) Statement published alongside the adopted version of the Guildford Local Plan	Mark Fessey Associate Director	Steve Smith Technical Director	Steve Smith Technical Director

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AECOM Infrastructure & Environment UK Limited
2 Leman Street, London E1 8FA

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1 INTRODUCTION (INCLUDES HRA STATEMENT)

Background

- 1.1.1 The Guildford Local Plan was submitted to Government, for examination by an appointed Planning Inspector, on 13th December 2017. Following an examination process involving hearings held in June and July 2018, and then resumed hearings in February 2019, the Inspector's final report into the Plan's legal compliance and soundness was published on 28th March 2019. The Inspector concluded that the plan is legally compliant and sound, subject to a series of modifications being made. The Local Plan, incorporating modifications, is recommended for adoption at a Full Council meeting on 25th April 2019.
- 1.1.2 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view to sustainable development.
- 1.1.3 Also, at this point there is a need to briefly note the **Habitats Regulations Assessment (HRA)** undertaken alongside plan-making, the conclusion of which is reported in Box 1.1.

Box 1.1: Local Plan HRA Statement

The Local Plan was subject to Habitats Regulations Assessment (HRA) at key stages throughout the plan making process. The final HRA Report consists of:

- HRA Report (November 2017)
- HRA Update (June 2018)
- HRA Report Addendum (September 2018)
- HRA Report Addendum (January 2019)

These documents are available at: www.guildford.gov.uk/newlocalplan/hra

The HRA concludes that no adverse effects on the integrity of the Thames Basin Heaths Special Protection Area (SPA) or the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) will result from the Local Plan, whether alone or in combination with other plans or programmes.

In line with statutory requirements, the Council consulted with Natural England on the ultimate findings of the HRA in March 2019 and received confirmation that Natural England did not object to the findings on 19 March. The Council is therefore satisfied that the Local Plan complies with the requirements of The Conservation of Habitats and Species Regulations 2017.

SA explained

- 1.1.4 It is a requirement that SA involves a series of procedural steps. The final step in the process involves preparing a 'statement' at the time of plan adoption. The aim of the SA Statement is to present –
- 1) The 'story' of plan-making / SA up to the point of adoption.
Specifically, there is requirement¹ to: *“summaris[e] how environmental considerations have been integrated into the plan....and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of the other reasonable alternatives dealt with.”*
 - 2) Measures decided concerning the monitoring of plan implementation.
Specifically, there is a requirement to explain *“the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.”*

¹ The information to be provided in the Statement is listed in Article 9 of the SEA Directive and Regulation 16 of the SEA Regulations.

This SA Statement

- 1.1.5 This is the Guildford Local Plan SA Statement, and hence considers **(1)** and **(2)** in turn. This Statement concludes by presenting a checklist of legal requirements, with a view to demonstrating the legal compliance of the SA process undertaken with the SEA Regulations.

2 THE PLAN-MAKING / SA 'STORY'

2.1 Introduction

- 2.1.1 Key steps in the SA process were as follows:

- 1) An Initial SA Report was published at the Issues and Options stage in **2013**
- 2) An Interim SA Report was published at the Draft Plan stage in **2014**
- 3) The SA Report was published at the Proposed Submission / Publication stage in **2016**
- 4) An SA Report Update was published at the Focused Changes stage in **2017**
- 5) An SA Report Addendum was published at the Proposed Modifications stage in **2018**

- 2.1.2 Each step is discussed, in turn, below, with greater attention given to latter steps.

N.B. all SA documents are available at: guildford.gov.uk/newlocalplan/sustainabilityappraisal

2.2 Initial SA Report (2013)

- 2.2.1 The Initial SA Report published alongside the Issues and Options consultation document presented an appraisal of reasonable spatial strategy alternatives as well as alternatives 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.

- 2.2.2 A summary of the main appraisal conclusions from the Initial SA Report was presented in Section 6.2 of the SA Report Update (2017); however, the appraisal conclusions are now somewhat dated hence they are not repeated here. Section 6.2 of the SA Report Update also presented a summary of some of the key issues raised through the Issues and Options consultation.

2.3 Interim SA Report (2014)

- 2.3.1 The Interim SA Report published alongside the Draft Plan consultation document essentially answered two key questions: (1) *What has plan-making / SA involved up to this point?* (2) *What are appraisal findings at this stage?*

- 2.3.2 In relation to (1), the report essentially:

- explained work to develop reasonable spatial strategy alternatives in 2013/14;
- presented an appraisal of the alternatives ultimately arrived at;
- presented the Council's response to the alternatives appraisal; and
- presented site options appraisal findings.

2.3.3 In relation to (2), 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* in terms of education (given a focus on linking housing to education and providing high quality student accommodation); economy and employment; landscape; and climate change mitigation; and *negative effects* in terms of air/environmental quality (given a focus of growth at locations with known issues); and affordable housing needs (given that delivering the 'objectively assessed housing need' figure would not involve meeting affordable housing needs in full).

2.3.4 Consultation on the Draft Plan 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 in Guildford town centre. Section 6.3 of the SA Report Update (2017) presented a summary of some of the key issues raised through the consultation; and it is also worth noting that a Consultation Report was published following the consultation.²

2.4 SA Report (2016)

2.4.1 The SA Report published alongside the Proposed Submission Plan once again essentially answered two key questions: (1) *What has plan-making / SA involved up to this point?* (2) *What are appraisal findings at this stage?*

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

- explained work to develop reasonable spatial strategy alternatives in 2016 – **Box 2.1**;
- presented an appraisal of the alternatives ultimately arrived at – see **Box 2.2**; and
- presented the Council's response to the alternatives appraisal – see **Box 2.3**.

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

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

2.4.4 The consultation generated approximately 32,000 comments received from approximately 6,000 individuals and bodies. Section 6.4 of the SA Report Update (2017) presented a summary of some of the key issues raised through the consultation; and the 'Regulation 22' Statement submitted alongside the Local Plan presents a detailed review.³

² The Consultation Report is available at: www.guildford.gov.uk/newlocalplan/previousconsultations

³ The Regulation 22 Statement is available at: guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=26744&p=0

Box 2.1: Reasons for selecting the alternatives dealt with (2016)

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

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

The final step was then to draw upon the established variables/options in order to establish reasonable spatial strategy alternatives. Eight reasonable spatial strategy alternatives were ultimately arrived at, and presented across a series of tables and maps. In summary, the 2016 alternatives were as follows –

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

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

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

Box 2.2: Conclusions of the 2016 appraisal of spatial strategy alternatives

In conclusion, having ranked the performance of the alternatives in terms of each of the sustainability topics, and also identified/evaluated significant effects, it is clear that:

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

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

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

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

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.

⁴ N.B. the necessary transport assessment work was subsequently completed - see <https://www.guildford.gov.uk/newlocalplan/transport>

Box 2.3: The Council's response to spatial strategy alternatives appraisal 2016 (summarised)

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

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

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

2.5 SA Report Update (2017)

2.5.1 The SA Report published alongside the Focused Changes to the Proposed Submission Plan again essentially answered two key questions: (1) *What has plan-making / SA involved up to this point?* (2) *What are appraisal findings at this stage?*

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

- explained work to develop reasonable spatial strategy alternatives in 2017 – **Box 2.4**;
- presented an appraisal of the alternatives ultimately arrived at – see **Box 2.5**; and
- presented the Council's response to the alternatives appraisal – see **Box 2.6**.

2.5.3 In relation to (2), there was a need to reach conclusions on both the updated plan as a whole, and on the Focused Changes in isolation. In respect of the updated plan as a whole, the following conclusion was reached within the SA Report Update (2017) –

“The appraisal finds the Proposed Submission Plan 2017 to perform well in terms of a number of sustainability objectives, with ‘significant positive effects’ predicted in terms of Communities, Economy and employment, Health, Housing and Landscape. These significant positive effects mostly relate to the proposal to meet objectively assessed needs, and in turn support community infrastructure upgrades. The positive conclusion reached for Landscape reflects an understanding that sensitive areas have been avoided as far as possible, and also an understanding that the baseline / ‘no plan’ scenario would likely involve housing growth coming forward in an unplanned way, potentially impacting more sensitive landscapes.

Significant negative effects are predicted only in terms of ‘land’, reflecting the loss of agricultural land, including land that is relatively high quality in the Guildford context. However, the plan is also inevitably associated with numerous more specific draw-backs, perhaps most notably in respect of biodiversity (e.g. Wisley Airfield will be in close proximity to an internationally important area of heathland, albeit mitigation is proposed) and transport (e.g. uncertainties regarding localised traffic impacts in the Send area have been highlighted).

Recommendations have been made throughout the SA process, with a view to improving the performance of the plan in terms of specific sustainability objectives. A number of recommendations have been addressed already within the plan, but the following recommendations remain outstanding at the current time:

- *Add detail to the policy for Wisley Airfield, to ensure that impacts to the SNCI are minimised.*
- *Consider the risk of traffic congestion in the Send area.*
- *Provide a policy mechanism to ensure that growth is maximised in Guildford town centre.*
- *Supplement policy in respect of SARP, to more explicitly reflect regeneration priorities.”*

2.5.4 The appraisal also reached the following conclusion in respect of cumulative effects:

The SA process has included a focus on effects not just at the Guildford Borough scale, but at appropriate larger than local functional scales, most notably the West Surrey scale (i.e. Guildford, Woking and Waverley), which is known to be a functional Housing Market Area (HMA) and Functional Economic Market Area (FEMA). As part of this, there has been a need to recognise that the baseline situation is one whereby Woking and Waverley will be pursuing their own planning objectives, i.e. there is a need to recognise that the Guildford Local Plan will not be implemented in a vacuum, but rather will impact cumulatively.

Housing and economic growth matters have emerged as the key ‘larger than local’ consideration, and in respect of these two matters (only) the conclusion is that: whilst the plan performs well (see discussion of significant positive effects under the ‘Housing’ and ‘Economy and employment’ headings), there might be the potential to go further, i.e. provide for higher growth in order to more fully realise housing and economic objectives at the West Surrey scale (see discussion of higher growth spatial strategy options in Part 1 of this report).”

2.5.5 Consultation responses received were summarised within the ‘Regulation 22’ Statement submitted alongside the Local Plan (see [link](#) above), and informed preparation of the Inspector’s ‘Matters and Issues for Examination’ (April 2018), which proposed to focus the examination on: Plan preparation; Calculation of OAHN; Unmet need in the Housing Market Area (HMA); Housing trajectory; Five year housing land supply; Homes for all; Meeting employment needs; Retail and service centres; Spatial strategy, Green Belt and countryside protection; Built environment and heritage assets; and Site allocations.

Box 2.4: Reasons for selecting the alternatives dealt with (2017)

A stepwise process was followed akin to that followed in 2016, as discussed in Box 2.1, above. After having presented a review of the relevant context and background, the first step was to explore growth quantum options (with no assumptions made regarding distribution / site selection), namely the option of providing for OAHN, the option of providing for below OAHN and the option of providing for above OAHN. The next step was then to examine distribution options, which involved giving consideration to each tier of the established spatial hierarchy in turn and querying whether the approach to growth should be a ‘constant’ across the reasonable spatial strategy alternatives (which in practice means allocating those sites supported by the Council’s Land Availability Assessment, LAA) or a ‘variable’. For spatial tiers identified as needing to be a variable, the next step was to consider precisely which options should be included within the reasonable spatial strategy alternatives (which in practice means querying whether to explore non-allocation of one or more sites supported by the LAA and/or allocation of one or more sites not supported by the LAA). Ultimately three variables were identified, with two options identified in each instance. This directly led to eight reasonable spatial strategy alternatives (i.e. the alternatives reflect all of the permutations). In summary, the 2017 reasonable alternatives were as follows –

	No. homes	Distribution
1	13,600	Low growth option for all three variables
2	14,080	High growth at GB villages
3	14,200	High growth at Countryside beyond the Green Belt
4	14,600	High growth at Guildford (Clandon Golf)
5	14,680	High growth at GB villages and Countryside beyond the Green Belt
6	15,080	High growth at GB villages and Guildford (Clandon Golf)
7	15,200	High growth at Countryside beyond the Green Belt and Guildford (Clandon Golf)
8	15,680	High growth option for all three variables

Box 2.5: Conclusions of the 2017 appraisal of spatial strategy alternatives

All options are associated with pros and cons. Option 1 is notable for performing best in terms of a several sustainability topics; however, the appraisal also serves to indicate some draw-backs to this option.

Taking notable topics in turn -

- Biodiversity – It is fair to conclude that lower growth is supported, albeit lower growth could potentially lead to unmet needs that must be met elsewhere within the heavily constrained sub-region.
- Climate change – Most higher growth options perform relatively well, as additional housing would be delivered at one or more strategic-scale schemes, where there would be the potential to fund/deliver low carbon infrastructure and/or achieve ambitious standards of energy efficiency.
- Communities – Only higher growth options involving an additional extension to Guildford at ‘Clandon Golf’ are supported, as this is a large scheme that would deliver new/upgraded strategic community infrastructure.
- Economy - The Strategic Housing Market Assessment (SHMA) is clear that housing under-delivery within the West Surrey Housing Market Area (HMA), which is also a Functional Economic Market Area (FEMA), could result in economic growth opportunities going unrealised; hence options not making a contribution to meeting Woking’s unmet housing need perform less well.
- Employment – Only higher growth options involving an additional extension to Guildford at ‘Clandon Golf’ are supported, as this is a large scheme that would deliver new (limited) employment land. Higher housing growth aligned with higher employment growth is to be supported at Guildford, from a pure national/regional economic growth perspective (leaving aside other considerations, e.g. traffic).
- Flooding – Some of the sites that would be delivered under certain higher growth options are associated with a minor flood risk constraint. It is likely that risk can be avoided in practice.
- Historic environment - the degree of impact generally increases in-line with the quantum of growth, although the correlation is not entirely linear, as there is an instance of an option involving only marginally higher growth with the additional housing at a less constrained site.
- Housing - Higher growth options are to be supported given the importance of putting a buffer in place, in order to maximise the likelihood of Guildford delivering on its Objectively Assessed Housing Need (OAHN) figure, and given the likelihood of housing undersupply within the HMA (arising from Woking). High growth options would involve making a contribution to meeting unmet needs within the HMA.
- Land - all options would result in significant loss of best and most versatile agricultural land, and hence significant negative effects, although all options would maximise brownfield development.
- Landscape – Most sites that come into contention under higher growth options are constrained, and so the degree of impact increases in-line with the quantum of growth supported.
- Transport - The degree of impact generally increases in-line with the quantum of growth, although not entirely due to the sites varying in terms of transport constraint / opportunity (in terms of support for modal shift and/or traffic congestion). With regard to effect significance, there is confidence that Option 1 would not lead to significant negative effects, given the findings of the Strategic Highway Assessment Report (2016). Higher growth options have not been subjected to transport modelling, and so there is no certainty regarding the potential for ‘a severe impact on the local and strategic highway network’; however, it is appropriate to ‘flag’ the risk of significant negative effects under Option 8.
- Water - A recent Water Quality Assessment has found that the Ash Vale Wastewater Treatment Works (WwTW) in the west of the borough has limited capacity to receive additional wastewater, potentially constraining spatial strategy options 3, 5, 7, 8, which would see additional growth at Ash/Tongham; however, the study concludes that it should be possible to increase the capacity of the WwTW.
- The intention is for the Council and stakeholders to take these findings into account when considering how best to ‘trade-off’ between competing objectives, and establish the ‘most sustainable’ option.

Box 2.5: Council's response to spatial strategy alternatives appraisal 2017 (summarised)

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

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

- Biodiversity - ... There are risks to biodiversity; however, there is good potential to avoid or mitigate impacts in practice. It is recognised that Wisley Airfield is particularly sensitive; however, detailed work has served to demonstrate that ecological value is concentrated at specific locations within the site, and SPA mitigation has been the focus of detailed work and consultation with Natural England.
- Climate change - Whilst the appraisal highlights that higher growth options perform better, on the assumption that there would be greater potential to deliver district heating schemes and so reduce average per capita CO₂ emissions from the built environment, this is not an overriding consideration...
- Economy - The appraisal serves to highlight an economic argument for providing for a quantum of housing above that necessary to provide for the SHMA assigned OAHN figure, on the basis that there is a need to provide for housing needs within the HMA, which is also a FEMA. However... [w]hilst additional housing in Guildford Borough might in theory support realisation of economic growth opportunities within the FEMA, in practice it is not clear that this would be the case, as there could be an imbalance of housing and employment locally, with implications for commuting, and in turn traffic congestion.
- Employment - The appraisal suggests that a higher growth option involving Clandon Golf would be preferable, as this site would deliver additional employment land; however, this site performs poorly in certain respects (e.g. landscape)... Clandon Golf would not align with the [the established] strategy, notably because it is divorced from the Sustainable Movement Corridor.
- Land - ... The extent of constraints within the borough, including the AONB to the south and the SPA to the north, means that there is a need to focus development within a central band through the borough, where there is extensive best and most versatile agricultural land.
- Landscape - ... There will be impacts under the preferred option; however, the Council is confident in the ability to mostly ensure landscape impacts that are of no more than very local significance, given proposed policy aimed at guiding masterplanning, layout, design and landscaping. A strategic development at Blackwell Farm poses particular issues, from a landscape perspective, however a number of steps have been taken to minimise conflicts since the time of the 2014 draft plan...
- Housing - The preferred option performs well as it will put in place a strategy for meeting the borough's OAHN; however, it is recognised that the strategy will likely result in unmet housing needs within the HMA (on the assumption that the Waverley Local Plan will not provide for all unmet needs arising from under-supply in Woking)...
- Transport - ... There will be impacts under the preferred option; however, the Council is confident in the ability to avoid severe impacts, given the findings of the transport modelling work completed in 2016... Furthermore, plans for infrastructure delivery have been reviewed, revised and where necessary strengthened since 2016... It is considered that the higher growth strategy for the Send area can be managed through the planned schemes in the Plan and future development management processes...

2.6 SA Report Addendum (2018)

2.6.1 The SA Report Addendum published alongside Proposed Modifications again essentially answered two key questions: (1) *What has plan-making / SA involved up to this point?* (2) *What are appraisal findings at this stage?*

2.6.2 In relation to (1), the report essentially:

- explained work to develop reasonable spatial strategy alternatives in 2018 – **Box 2.7**;
- presented an appraisal of the alternatives ultimately arrived at – see **Box 2.8**; and
- presented the Council's response to the alternatives appraisal – see **Box 2.9**.

2.6.3 In relation to (2) – i.e. the appraisal of Proposed Modifications – the following conclusion was reached within the SA Report Addendum (2018) –

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

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

2.6.4 Consultation responses received were forwarded to the Inspector, who then identified the need for resumed hearings covering just certain specific matters. The Inspector's note on Matters and Issues for the resumed hearings stated:

“The Inspector invites statements from the Council and Attendees on the implications of the 2016 household projections for OAN and the plan's housing requirement. In addition he wants to consider whether there would be consequential changes for the housing trajectory and 5 year HLS, and any other consequences affecting the main modifications, such as the inclusion or exclusion of the additional housing sites (but not their merits)... Please note that the Inspector will not be opening up the hearing to cover any items other than those mentioned above. The spatial strategy, strategic sites and constraints have already been thoroughly discussed and we will not be going back to them. As regards the additional sites added at the modification stage, discussion will be confined to the need or otherwise for their allocation having regard to any revised OAN and housing trajectory. He does not intend to discuss their characteristics or the impacts of their allocation because he can rely on the written submissions and his own observations.”

Box 2.7: Reasons for selecting the alternatives dealt with (2018)

The first step was to consider high-level parameters to guide the process of establishing alternatives:

- *“There is a need to identify packages of sites to deliver 550 homes in the first five years of the plan period. Packages of sites with a total yield significantly above this figure can be ruled-out as unreasonable. Equally, there is no need to consider packages with a total yield (within the first five years) significantly above 550 homes, as contingency for non-delivery (as there will be confidence regarding the delivery timescales of the sites that are taken forward).*
- *In order to minimise risk of delays to site delivery leading to a problem in respect of five year supply, there is a need to examine packages of sites only, i.e. the option of providing for additional supply at a single large site can be ruled-out as unreasonable. Furthermore, site packages should be geographically spread, which in practice means not concentrated at one single lower tier settlement, and not overly dependent on new infrastructure delivery.*
- *There is a need to accord with the spatial strategy (see para 5.2.9) as far as possible, which in practice means seeking to avoid additional supply at Green Belt sites around villages; however, in practice this is a challenge, given a need to balance competing objectives (e.g. whilst larger extensions to main settlements accord with the spatial strategy, they may also tend to be associated with a degree of delivery risk). This matter is explored further below.”*

The next step was then to examine distribution options, which involved giving consideration to each tier of the established spatial hierarchy in turn (as per the process in 2016 and 2017, see above). Ultimately one site was identified as firmly warranting additional allocation (Garlicks Arch; more specifically, it was determined appropriate to increase the yield of the existing allocation by 150 homes) and seven sites were identified as potentially suitable for additional allocation, comprising three sites at Tier 8 (Guildford or Godalming Urban Area) and four sites at Tier 10 (Green Belt around villages). Certain site combinations were deemed unreasonable, leading to seven reasonable spatial strategy alternatives as follows –

	No. of additional homes in years 1-5	Additional Tier 8 sites	Additional Tier 10 sites
1	550	Clandon Golf, Guildford Aaron’s Hill, Farncombe	-
2	550	Liddington Hall, Guildford Aaron’s Hill, Farncombe	-
3	555	Aaron’s Hill, Farncombe	Land at Hornhatch Farm, New Road, Chilworth Land east of Glaziers Lane, Flexford Land at Alderton’s Farm, Send Marsh Road, Send Marsh
4	585	Clandon Golf, Guildford	Land at Polesdon Lane & Send Marsh Road, Send Marsh Land at Hornhatch Farm, New Road, Chilworth Land east of Glaziers Lane, Flexford
5	585	Liddington Hall, Guildford	Land at Polesdon Lane & Send Marsh Road, Send Marsh Land at Hornhatch Farm, New Road, Chilworth Land east of Glaziers Lane, Flexford
6	605	Aaron’s Hill, Farncombe	Land at Polesdon Lane & Send Marsh Road, Send Marsh Land at Hornhatch Farm, New Road, Chilworth Land east of Glaziers Lane, Flexford Land at Alderton’s Farm, Send Marsh Road, Send Marsh
7	650	Clandon Golf, Guildford Liddington Hall, Guildford	-

Box 2.8: Conclusions of the 2018 appraisal of spatial strategy alternatives

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

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

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

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

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

Box 2.9: Council's response to spatial strategy alternatives appraisal 2017 (summarised)

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

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

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

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

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

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

2.7 Plan finalisation

2.7.1 The Inspector's final report on Guildford Local Plan was published by GBC on 28th March 2019, concluding on the modifications necessary in order to achieve soundness, and commenting on the merits of the plan in respect of a number of the issues that had been a focus of preceding SA, notably:

- Whether the housing requirement should be OAHN or a higher figure - *"[I]t is unnecessary to make a specific allowance in Guildford's housing requirement to help meet unmet need from Woking. That is because the likely residual amount of unmet need from Woking can be accommodated within the Guildford Borough Local Plan's headroom – the difference between the housing requirement of 562 dpa and the number of homes that can be delivered from all sources over the life of the plan. (paragraph 38)*
- Providing for a potential delivery/supply above the requirement - the Inspector makes the following initial point at paragraph 46: *"[T]he Council's calculated housing requirement of 562 dpa, or 10,678 dwellings over the life of the plan... is sound. It reflects the latest evidence and is based on sound analysis. The overall level of housing delivery, currently calculated at 14,602 homes, will ensure that an adequate 5 year supply of land will be maintained and will ensure that the plan is robust; it will deliver sufficient housing to help address the pressing issues of affordability and affordable housing need, and contribute towards addressing unmet housing need in the housing market area."*
- At paragraphs 83 to 85 the Inspector then answers in detail the question of *"Whether the difference between potential supply of 14,602 dwellings and the latest MM2 housing requirement of 10,678 implies that the plan should allocate fewer sites and release less Green Belt land"*. The Inspector finds that -

"The first point here is that the plan must be considered as a whole; it contains an integrated set of proposals that work together... the strategic allocations operate to deliver a range of benefits which cannot be achieved by smaller dispersed sites... The sites all work in concert to deliver a sound, integrated approach to the proper planning of the area.

Secondly, the plan needs to be robust and capable of meeting unexpected contingencies such as delivery failure or slippage on one or more sites. It needs to be borne in mind that the housing requirement is a minimum figure, not a target. A robust strategy is particularly relevant for Guildford where longer term housing delivery is largely by means of large strategic housing sites. There is also uncertainty about the timing of the A3 RIS scheme... the headroom provides some flexibility over timing and ensures that if a degree of slippage does occur, the Plan is not vulnerable...

Thirdly, the Plan needs to be effective over its life and have regard to potential changes in circumstances. To that end it contains a balance of short- and long-term sites... The permitted and commenced sites and smaller allocations deliver the 5 year supply... When delivery from these sites starts to diminish, that from the strategic sites builds up. But large strategic sites have long lead-in times and development periods... Circumstances may change, and new strategic sites cannot be brought forward quickly to meet revised housing requirements; they have to be planned well in advance. Therefore, by making the allocations now, the Council have aimed to future proof the Plan. This is in accordance with the NPPF which says that plans should have sufficient flexibility to adapt to rapid change...

- Also of note is paragraph 86, where the Inspector considers whether the quantity of development should be restricted having regard to the policies set out in footnote 9 of the NPPF (such as Green Belt, AONB and protected under the Habitats Directive):

“Subject to the proposed Green Belt alterations, the Plan is capable of meeting objectively assessed needs with adequate flexibility. The alterations to the Green Belt boundary would have relatively limited impacts on openness as discussed in Issues 10 and 11, and would not cause severe or widespread harm to the purposes of the Green Belt. The allocations at A25 Gosden Hill Farm and A26 Blackwell Farm would be planned urban extensions rather than sprawl. Site A25 together with the allocations at Send and Burnt Common/Send Marsh would be visually and physically separate, as discussed in Issue 7 and would not add to sprawl or coalescence. A35 Former Wisley airfield would include a substantial amount of previously developed land and is separate in character from its wider Green Belt surroundings. The other Green Belt sites would be adjacent to settlements and would have very localised effects on openness. There is therefore no justification for applying a restriction on the quantity of development. Considerations in respect of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Thames Basin Heaths Special Protection Area (SPA) do not alter this conclusion: see issue 7.”

- Finally, the Inspector deals with ‘overall spatial distribution’ across paragraphs 91 to 97, concluding as follows:

“The spatial strategy in the Plan has three considerable advantages. Firstly, it allocates the largest amounts of development to the most sustainable locations, or those which can be made sustainable; secondly, it achieves a satisfactory spatial balance in a variety of locations and types of site; and thirdly, the strategic sites will accommodate a significant amount of the Borough’s housing and employment needs whilst at the same time meeting their own social needs and contributing towards transport improvements that have wider benefits. The advantages of the last of these points is recognised by the Sustainability Appraisal and it justifies the inclusion of the larger sites including Gosden Hill Farm, Blackwell Farm and the former Wisley airfield.

Allocating more sites at the villages might allow for some earlier housing delivery but would risk eroding their character and would not enable the full range of social facilities and sustainable transport benefits that the large strategic sites can bring. Allocating additional land in the Ash and Tongham area would alter the spatial balance of the plan and risk creating a sprawl of development just beyond the Green Belt; it would also potentially exacerbate highway capacity problems...

The inclusion of these strategic sites makes for an effective plan that meets the sustainable development needs of the Borough. Their size facilitates the delivery of social, transport and other facilities that would be more difficult to achieve by spreading the same amount of development around on smaller sites. They serve housing, employment and social needs in different parts of the Borough, yet are well positioned in relation to Guildford. They are in locations where they do not significantly affect areas important for landscape and biodiversity. Transport issues are dealt with below...”

2.7.2

In respect of the Sustainability Appraisal process, the Inspector states at paragraph 219 that: *“Sustainability Appraisal has been carried out and is adequate. It was unnecessary to carry out a further sustainability appraisal in relation to MM2 since the level of housing provision was within the range of options tested by the SA and the housing sites were the same as those in the submitted Plan.”*

3 MEASURES DECIDED CONCERNING MONITORING

3.1.1 With regards to monitoring, the plan document states (Section 1):

“We need to assess whether this Local Plan is meeting its aims and objectives, and have appropriate mechanisms in place so that we can recognise if it is not and actions can be taken accordingly. [Hence] each policy in this document is accompanied by monitoring indicators. Where policies are failing to deliver against the strategic objectives of this plan, necessary actions will be identified in our Annual Monitoring Report. Amongst other things, the Annual Monitoring Report will show the number of homes and amount of employment and retail space that have been delivered (on an annual basis) against our objectively assessed need. We will review the Local Plan, if required... As part of a review, we will consider the proposed level of new homes and employment land...”

3.1.2 The SA Report Update (2017) commented on a number of indicators deemed to be of particular importance from an SA perspective, given appraisal findings - see Table 3.1.

Table 3.1: Monitoring indicators of particular importance, in light of appraisal findings

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

3.1.3 The Inspector’s Report then identified a need for a number of modifications in respect of monitoring indicators. Most notably:

- the monitoring indicators for development in the AONB and the countryside, ensuring that all planning decisions on non-allocated sites are monitored (rather than appeals only); and
- the monitoring indicator for Policy P4 (Flooding), ensuring that monitoring takes account of the specific flood risk zone (medium or high risk) involved.

4 CONCLUSIONS ON THE SA PROCESS

- 4.1.1 This SA Statement demonstrates that a robust SA process has been progressed alongside plan-making, with appraisal findings and consultation responses feeding in to decision-making at key junctures. Most importantly, in terms of compliance with both the SEA⁵ and Local Planning⁶ Regulations, the SA Report was published alongside the proposed submission version of the plan in 2016, and then an SA Report Update published in 2017, with both reports presenting the required information, namely the information required by Regulation 12 of the SEA Regulations. An SA Report Addendum was then published in 2018 in respect of the proposed modifications to the plan. These reports served to inform representations on the plan, and then served to inform plan finalisation.
- 4.1.2 This SA Statement is the final step in the SA process. Its aim is to explain the ‘story’ of the plan-making / SA process, and also present measures decided concerning monitoring. **Table 4.1** serves to demonstrate that this report presents the required information.

Table 4.1: Regulatory checklist

The SA Statement must...	How has this report presented the required information?
Summarise how environmental (and wider sustainability) considerations have been integrated into the plan	This report has sought to provide examples of key sustainability considerations that have been highlighted through appraisal and consultation, which in turn were taken into account, and have been integrated into the plan. First and foremost, the relative merits of competing site options and spatial strategy alternatives were appraised in terms of a range of sustainability issues/objectives, with a view to informing selection of the best performing sites / spatial strategy.
Summarise how the SA Report and consultation responses received, as part of the Draft Plan / SA Report consultation, have been taken into account when finalising the plan.	This statement seeks to explain an iterative process, particularly in respect of exploring reasonable alternatives. Reference is made to consultation responses received throughout Section 2, and it is naturally the case that all consultation responses were taken into account by the plan-makers at the subsequent plan-making stage, and by the SA consultation, both when refining understanding of the SA scope, and when establishing new / updated reasonable alternatives. Also, Section 2.7 seeks to demonstrate that appraisal findings and consultation responses received were taken into account by the Inspector when deciding on modifications / finalising the plan.
Summarise the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.	Section 2 explains how the Council explicitly responded to the alternatives appraisal ahead of the plan being finalised for consultation at each stage. The Inspector’s report equally sets out detailed reasons in support of his conclusion on plan soundness, with reference to reasonable alternatives.
Summarise the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan	See Section 3

⁵ Environmental Assessment of Plans and Programmes Regulations 2004

⁶ Town and Country Planning (Local Planning) (England) Regulations 2012