



# Draft Guildford borough Local Plan: strategy and sites

Interim Sustainability Appraisal  
Report: Non-Technical  
Summary

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## Introduction

URS has been commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Guildford Borough Local Plan: strategy and sites 2011-2031. SA is a mechanism for considering and communicating the likely effects of a draft plan, and reasonable alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Local Plan is a legal requirement.<sup>1</sup> This is the **non-technical summary** of the Interim SA Report.

The Local Plan is a local development plan document that will set out the Council's proposals for the future development of the borough up to 2031 through a suite of new planning policies. All local authorities are required to prepare a Local Plan with the objective of setting out the spatial implications of economic, social and environmental change. The plan will provide a policy framework that will ultimately provide the basis for a wide range of planning decisions in the future.

### **Structure of the Interim SA Report / this non-technical summary**

The Interim SA Report (and this non-technical summary) sets out to answer four questions:

What's the scope of the SA?

What has plan-making / SA involved up to this point?

What are the appraisal findings and recommendations at this current stage?

What are the next steps?

### **What's the scope of the Sustainability Appraisal?**

An important first step in the SA process requires establishing the 'scope', i.e. those sustainability issues which should be a focus of SA, and those that should not. In order to establish the scope there is a need to answer a series of questions including:

#### *What's the sustainability 'context'*

Answering this question primarily involves reviewing the Government's National Planning Policy Framework; however, it is also important to 'cast the net wider' and consider contextual messages established through other plans, policies, strategies and initiatives.

#### *What's the sustainability 'baseline'?*

Answering this question involves reviewing available data to establish an understanding of the current and likely future state of the environment and 'socio-economy' locally.

The following is a brief summary of some of the sustainability baseline characteristics described within the Interim SA Report. It is important to note that the following list is not comprehensive.

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<sup>1</sup> 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 SA Report must be published alongside the 'proposed submission' plan document. This is an early (not proposed submission) draft of the plan and hence an 'Interim' SA Report has been produced to aid consultation.

### ***Social baseline***

The borough's population has grown by 12,300 in 30 years. In the 2011 census the population totalled 137,200. Population projections for Guildford are for an increase of between 16.7% - 20.7% between 2011 and 2031; resulting in an estimated population of over 160,000 in 2035.

The borough has a higher proportion of people aged under-55 than the South East and England. The borough is expected to see a 36% increase in over-55s over the next 20 years.

Guildford is in the 10% least-deprived authorities in the country; however isolated pockets of relative deprivation exist around Westborough, Stoke, Ash Wharf, Friary and St Nicolas, Mellow and Worplesdon.

Health in the borough is generally favourable with a higher life expectancy than the national average; however there is a wide gap in life expectancy between the most and least deprived income groups.

Guildford borough has a large amount of open space and playing fields; however there is a deficit in the urban areas.

Housing affordability is an issue in the borough with average house prices higher than the regional and national averages. Housing affordability has decreased since 1997 with house prices costing over ten times the annual salary.

There is a deficit in affordable housing supply and the current completion rate is below the annual level required to address the deficit. There is a shortfall of 942 dwellings per annum across all tenures, of which 59% is for affordable housing. There is a particular requirement for 2 and 3 bed properties but also for specialist housing for older people and student housing.

### ***Economic baseline***

Guildford's economy is closely tied to that of London and the proximity of Heathrow and Gatwick Airports. However Guildford's current economic success comes at the price of congested roads, pressure on infrastructure and high house prices.

The high cost of housing prevents key and low paid workers from living in much of the borough. This will affect the ability of local businesses to employ these workers. Due to the above growth rates in employment are predicted to be lower than nearby comparator economies, with losses in manufacturing, construction, wholesale and education

Average (median) salary levels within Guildford are higher than those for the South East and the rest of Great Britain for both males and females.

Guildford performs favourably in terms of residents in employment compared to the South East and Great Britain; on average a smaller proportion of people are unemployed in Guildford. Concentrations of unemployment and low qualifications exist at Westborough, Stoke and Ash Wharf.

Educational attainment in the borough is higher than the national and South East average; however a shortage of school places is predicted, particularly in the Guildford Town area; however it is understood that this is currently being addressed.

Sections of the A3 trunk road through Guildford are operating significantly in excess of their theoretical

capacity, and so users experience recurrent traffic congestion, mainly during rush hour. Traffic congestion is experienced on the Local Road Network in Guildford town centre. This congestion affects bus route operations whilst also making cycling and walking less attractive. The majority of Guildford’s residents commute to work by driving a car or a van.

**Environmental baseline**

The borough contains several sites that are designated for their nature conservation interest; most notably the European-designated Thames Basin Heaths Special Protection Area (SPA).

47% of land in the borough is within the zone of influence of the Thames Basin Heaths SPA. If development is to occur in these areas then Suitable Alternative Natural Greenspace will need to be provided as compensatory open space to prevent adverse impacts.

The borough is rich in cultural heritage with 39 Conservation Areas, over 1,000 Listed Buildings, over 200 Locally Listed Buildings, eight Historic Gardens and 31 Scheduled Monuments.

The borough has a high quality landscape with the Surrey Hills Area of Outstanding Natural Beauty covering much of the district to the south of Guildford; with Areas of Great Landscape Value elsewhere in the borough.

Carbon dioxide emissions per capita are higher in the borough than Surrey and the rest of the country; although emissions per capita have been declining. Emissions from transport are the main source of carbon dioxide in the borough.

Guildford Borough has over 1000 properties that are at risk in a 1% annual probability river flood, with 590 in Guildford town itself. Flood events are set to become more common over time due to climate change.

**The SA ‘framework’**

Drawing on the findings of the context / baseline review, a list of 17 SA Objectives was identified. These objectives provide a methodological ‘framework’ for the SA. The column on the right shows the broad ‘topic’ that the issues and objectives have been assessed under within the Interim SA Report.

Objective	Issues	Topic
1. To provide sufficient housing of a suitable mix taking into account local housing need, affordability, deliverability, the needs of the economy, and travel patterns	1. High average house prices create affordability problems for local people, first time buyers and essential key workers.	Housing
	2. There is a deficit in affordable housing supply and the current completion rate is below the annual level required to address the deficit.	
	3. The need for accommodation for people with care and support needs is likely to increase, given the projected increases in population and the proportion of older people in the borough	

Objective	Issues	Topic
2. To facilitate improved health and well-being of the population, including enabling people to stay independent and reducing inequalities in health	1. Life expectancy in the borough compares favourably with the South East and the rest of the country. Social and economic impacts of longevity need to be fed into relevant policies and budgets.	Health
	2. Obesity in the county is increasing. Provision of adequate sports and leisure facilities to encourage the take up of more active lifestyles should be regarded as an important component of community infrastructure.	
3. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	1. 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. Low river flows will occur because of drier summers.	Climate
4. To create and maintain safer and more secure communities	1. Violent crime has increased substantially since 2001.	Crime and Safety
	2. Perception of crime is worse than actual occurrence.	
5. To reduce poverty and social exclusion for all sectors of the community	1. There are a significant number of adults with no qualifications.	Economy and Employment
6. To create and sustain vibrant communities	1. Catering for population growth in the short-term with its associated social, economic and environmental consequences. Population increases are likely to place additional pressure on house prices and availability.	Population
	2. The age structure of the borough will require continued monitoring as age shifts will have long term implications for health care needs, housing mix and other social services.	
	3. Any pockets of deprivation need to be addressed.	

Objective	Issues	Topic
7. To make the best use of previously developed land and existing buildings	1. The supply of previously developed land in the borough is likely to decline over time and therefore development of greenfield sites might be required.	Soil
	2. Reusing previously developed land (PDL) will reduce pressure on the undeveloped areas of the countryside.	Soil
8. To conserve and enhance biodiversity and the natural environment	1. Large areas of the borough are covered by biodiversity designations, including internationally important SPAs, nationally important SSSIs, SACs, SINCS and ancient woodland.	Biodiversity
	2. Development pressures, fuelled by high land and property prices, pose threats to landscape interests.	Landscape
	3. There is a need to provide opportunities for countryside recreation and access whilst respecting its landscape quality and avoiding conflict with other users.	
	4. Existing areas of high quality open space should be protected and enhanced to avoid changes to the character of built up areas and to reduce pressures on the countryside.	
9. To protect, enhance, and where appropriate make accessible, the archaeological and historic environments and cultural assets of Guildford, for the benefit of residents and visitors	1. There is a need to conserve the historic and cultural heritage for future generations as it is an essential part of what makes the borough a distinct place.	Cultural Heritage
10. To achieve a pattern of development which minimises journey lengths and encourages the use of sustainable	1. For those without a car, access to a range of facilities in rural areas is an issue.	Air / Transport and Accessibility
	2. There are currently no Air Quality Management Areas (AQMAs) in the borough.	



Objective	Issues	Topic
<p>forms of transport (walking, cycling, bus and rail). See comments earlier on para 2.6.104.</p>	<p>3. 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.</p> <p>4. Development in the borough has the potential to exacerbate congestion. This is likely to be the major source of emissions/air pollution within the borough.</p>	
<p>11. To minimise the use of best and most versatile agricultural land (BVAL) and encourage the remediation of contaminated land.</p>	<p>1. Contamination issues may arise on previously developed sites.</p>	<p>Soil</p>
<p>12. To reduce waste generation and achieve the sustainable management of waste</p>	<p>1. 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.</p>	<p>Waste</p>
<p>13. To maintain and improve the water quality of the borough’s rivers and groundwater, and to achieve sustainable water resources management</p>	<p>1. River quality is generally poor and should be improved</p>	<p>Water</p>
<p>14. To mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases</p>	<p>1. Government policy requires new development to promote sustainable construction, energy conservation and renewable energy. Renewable energy generation could pose environmental challenges.</p>	<p>Climate</p>

Objective	Issues	Topic
15. To maintain Guildford borough and Guildford town's competitive economic role	1. The high cost of housing prevents key and low level workers from living in much of the borough. This will affect the ability of local businesses to employ these workers.	Economy and Employment
16. To facilitate appropriate development opportunities to meet the changing needs of the economy	1. The high cost of living housing prevents key and low level workers from living in the borough. This will affect the ability of local businesses to employ these workers.	Economy and Employment
17. To enhance the borough's rural economy	1. The high cost of living housing prevents key and low level workers from living in the borough. This will affect the ability of local businesses to employ these workers.	Economy and Employment

## What has plan-making / SA involved up to this point?

It is a legislative requirement that every SA Report includes an explanation of how/why the preferred (i.e. draft plan) approach was selected/developed in-light of earlier appraisal of 'reasonable alternatives'. As such, an interim stage of SA (i.e. a stage prior to appraisal of the draft plan / preparation of the SA Report) must involve appraisal of reasonable alternatives.

Specifically, this section explains how preparation of the draft Plan has been informed by:

- Appraisal of alternatives for a range of policy issues; and
- Appraisal of site allocation options.

### Policy Issues

The Council published their Issues and Options Paper for consultation in October 2013<sup>2</sup> accompanied by an Initial SA Findings report undertaken in August 2013<sup>3</sup>.

For some of the policy issues addressed within the Issues and Options consultation document, the Council was able to present a 'preferred option' (i.e. there were no reasonable alternatives) for comment. For most issues, however, the Council presented alternatives (i.e. options) for consultation.

The 'outline reasons for selecting the preferred approach' text is shown for each of the 14 'policy issues' in the table below. Please note that, for brevity, this section excludes a summary of the reasonable alternatives and SA findings at the interim SA stage (however more information can be found in Section 3 of

<sup>2</sup> Guildford Borough Council (2013) *Local Plan Strategy and Sites Issues and Options* [online] available at: [http://www.guildford.gov.uk/media/15420/Local-Plan-Issues-and-Options-document/pdf/Guildford\\_borough\\_Local\\_Plan\\_Strategy\\_and\\_Sites\\_Issues\\_and\\_Options.pdf](http://www.guildford.gov.uk/media/15420/Local-Plan-Issues-and-Options-document/pdf/Guildford_borough_Local_Plan_Strategy_and_Sites_Issues_and_Options.pdf). Accessed 26/06/2014

<sup>3</sup> URS (2013) *Guildford Local Plan Strategy: Initial Sustainability Appraisal Findings* [online] available at: [http://www.guildford.gov.uk/media/15250/Initial-Sustainability-Appraisal-August-2013/pdf/Initial\\_SA\\_Aug\\_2013.pdf](http://www.guildford.gov.uk/media/15250/Initial-Sustainability-Appraisal-August-2013/pdf/Initial_SA_Aug_2013.pdf). Accessed 26/6/2014

the Interim SA Report).

Policy issue	Outline reasons for selecting the preferred approach
Housing Number	<p>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.</p>
Spatial Strategy	<p>The main reason for the Council’s choice in terms of spatial strategy is the availability of suitable and deliverable sites (as identified through the Strategic Housing Land Availability Assessment process). 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.</p> <p>The draft plan includes two greenfield extensions on the edges of Guildford town, which reflects Option D. 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 beyond the plan period i.e. would not be implemented during the plan period). It should be note that whilst land has been proposed to come out of the Green Belt, if could not come forward prior to a Local Plan Review taking place. Both of these sources were included in Option E.</p>
Housing Density	<p>Allowing residential densities to be considered on a case by case basis allows flexibility to seek the most efficient use of land whilst responding to the local character, context and distinctiveness. To seek higher densities regardless of the local area context and character could be to the detriment of the borough and character of the neighbourhoods.</p>
Affordable Housing site Size Threshold and proportion	<p>Affordable housing viability evidence from 2008 indicates that most developments in the borough will be viable making a larger contribution than is currently required. It was found that this would be likely to lead to significant positive benefits for socio-economic objectives including housing, health, the economy, encouraging use of sustainable modes of transport, creating sustainable communities, and reducing poverty and social exclusion. Keeping the proportion of affordable housing required to at least 35 per cent would fail to optimise affordable housing delivery from those sites that can viably contribute.</p>

Policy issue	Outline reasons for selecting the preferred approach
Rural Exception Sites	<p>Option A was chosen in order to achieve an increase in the number of rural exceptions homes in the borough to meet rural housing needs. It provides for a flexible approach, allowing for different sizes and locations depending on local circumstances.</p> <p>Option B is not included in draft policy 5 as including market housing in rural exception schemes may have the effect of driving up land values of Green Belt agricultural land around villages. The Council will consider allowing an element of market housing where it can be justified in order to rural needs in the village or Parish.</p>
Gypsies and Travellers	<p>The Draft Local Plan sets out the approach to traveller accommodation provision in Policy 2 and Policy 3 and it identifies sites for pitches and plots for travellers. This is based on evidence from the Traveller Accommodation Assessment, the Traveller Strategic Housing Land Availability Assessment and Volume 6 of the Green Belt and Countryside Study. The approach taken above accords with government guidance contained within Planning Policy for Traveller Sites. Where land is identified for this use that is currently in the Green Belt, the Draft Local Plan proposes ‘insetting’<sup>4</sup> from the Green Belt where appropriate, with the exception of rural exception sites where there is potential to meet the policy criteria.</p>
Student Housing	<p>The Draft Local Plan Issues and Options consultation responses showed that many local residents are concerned about the amount of students living in market housing which could be occupied by families. This needs to be balanced with the fact that students have a free choice over where they choose to live. An increase in student accommodation was sought to balance the housing needs of students with those of the general population and to minimise the pressure on existing housing stock. A figure of providing campus accommodation for 60 per cent of eligible students at the University of Surrey was sought as this was considered the highest viable figure. To request the provision of student accommodation at a higher percentage could see higher vacancy rates as students will continue to choose to live off campus within the local community.</p>
Supporting tourism, arts and cultural facilities	<p>A combination of Options A and B is represented by Policy 14 as these considered to be both evidenced and deliverable during the plan period. Options C and D are not represented in Policy 14 because we do not presently have evidence to justify the need for specific policy. Policy 14 is written in a way that does not prevent such aspirations for eco-tourism and as a location for films.</p>

<sup>4</sup> Insetting is where a village is excluded from the Green Belt boundary. Currently the villages in Guildford are washed over by the Green Belt and form part of it.

Policy issue	Outline reasons for selecting the preferred approach
Employment Space	<p>The Employment Land Assessment identified that there was an insufficient supply of employment land to meet the needs for the future in order to retain economic prosperity. As such, the economic strategy of the Local Plan maximises upon the potential for utilising existing vacant employment sites by intensifying development on strategic sites, but it also allocates new sites to account for the shortfall of space the borough faces in the future. The economic strength of Guildford Borough is a key consideration for the Local Plan and this is further supported through the NPPF and NPPG. The approach taken by the Local Plan ensures that there will be jobs for the future and that businesses aren't forced to leave the borough to areas with more readily available sites. No alternative scenario was rejected; however, a hybrid option was created. Failing to provide for economic growth would not be beneficial to the borough, businesses or the community. The approach taken places emphasis on the reuse and intensification of existing sites to limit the need for development on greenfield sites. However, by restricting employment development and the expansion of businesses on the ground would not serve the economy in a positive way. Therefore, the Local Plan seeks to balance the need for growth against environmental factors.</p>
Rural Economy	<p>Three options were set out in the Initial SA Report for addressing the rural economy: Option A: Support economic growth in rural area; Option B: Balance protecting agricultural land and supporting economic growth; and Option C: Encourage tourism related development in the rural areas to support the rural economy. Option A: 'Support economic growth in rural areas.' was the clearest preference in the Initial SA Report. Whilst there is no explicit policy to match these options, the Draft Local Plan indicates that it would be supported through the amalgamation onto other policies, specifically Policy 8: Surrey Hills Area of Outstanding Natural Beauty (AONB) and Policy 10: Green Belt and the countryside. Therefore all options were taken forward.</p>
Traffic and Congestion	<p>A bundle of all the options was selected because, in combination, a range of SA objectives can be facilitated. Option E 'Set aside more road space on the main approaches into Guildford town centre...' will require the agreement of Surrey County Council, as the statutory authority for the Local Road Network, and discussions are ongoing. The 'sustainable movement corridor' has been included in the Draft Infrastructure Schedule of the Draft Local Plan as Appendix B.</p>

Policy issue	Outline reasons for selecting the preferred approach
Green Open Space	Options B and C were chosen. Option B was chosen because some of these sites are in GBC ownership, which makes the process simpler. As work had already been done to deliver these sites, there would be little point in changing strategy at this stage. Option C was chosen because this is considered the only way to meet the full need for SANG. The GBC owned sites alone would not be able to deliver enough SANG land in total, and not in the right places (for example, there is a large deficit of SANG land in the West of the borough, and the GBC owned sites will not cover this area). As there are question marks over the delivery of the sites in the Thames Basin Heaths Avoidance Strategy that are owned by Surrey County Council, new SANGs were needed. 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	A combination of Options B and C were chosen as they reflected the strategic nature of the Strategy and Sites part of the Local Plan and together they provide a strategic framework for achieving a better standard of built environment and design in the borough. Option A was rejected as this option demonstrated a development management approach that will be explored in the emerging Delivering Development Part 2 Local Plan that will follow on after the Strategy and Sites Local Plan.
Climate Change	The government released statements following the end of the Housing Standards Review signalling that national policy would be changed to prevent the setting of technical standards at the local level. For water, the intention is for a single national standard of 125 litres per day applied through Building Regulations, with an optional local Building Regulation that allows for a tighter standard of 110 litres per day. Therefore, the option of setting a standard lower than 105 litres per day through the Local Plan was rejected as it is unlikely to be possible. Support for water efficiency was included in order to provide support for introducing the optional Building Regulation when it becomes available.

### Site Appraisal

The draft Local Plan allocates a number of sites for development. In order to arrive at the proposed approach the Council went through a number of stages. The Council first identified a ‘long-list’ of ‘reasonable’ options from a number of sources<sup>5</sup>. Detailed site appraisal then took place on these sites using Geographical Information Systems (GIS) analysis. These interim site appraisal findings then fed into the Council’s selection of a preferred approach.

Twenty-two site appraisal questions were developed to reflect the sustainability objectives identified through SA scoping as far as possible. These appraisal questions reflect the level of detail available at this stage of plan making (i.e. detailed proposals will come forward at a later date in the form of planning applications). For each question, answers were colour-coded from green (no constraints) to red (a notable constraint). An extract of the SA appraisal criteria<sup>6</sup> is shown below:

<sup>5</sup> Including the Strategic Housing Land Availability Assessment; Green Belt and Countryside Study; Employment Land Assessment and Draft Town Centre Area Action Plan.

<sup>6</sup> The full list of appraisal criteria and results for each site option are documented in the Interim SA Report.

SA Objective	Criteria	Source	Score and threshold
16. To facilitate appropriate development opportunities to meet the changing needs of the economy	Distance to a Key Employment Site	Guildford Green Belt and Countryside Study	Measured walking distance: is within a Desirable distance: <b>500m or less</b> is within an Acceptable distance: <b>501-1000m</b> is within the Preferred Maximum: <b>1001-2000m</b> exceeds the Preferred Maximum: <b>greater than 2000m</b>

Through this process 135 ‘reasonable’ site options were assessed; of which 106 sites were included in the Draft Local Plan. Appraisal findings for the preferred approach can be found in the next section ‘*What are the appraisal findings at the current stage?*’ A total of 20 housing sites, 6 employment sites, 1 education site, 1 new Green Belt site and 1 Park and Ride site were not allocated by the Council due to notable constraints such as:

- Distance to a town, district, local centre or village shop;
- Distance to a secondary school;
- Distance to a primary school;
- Flood risk;
- Distance to the Thames Basin Heaths SPA;
- Distance to a Special Site of Scientific Interest (SSSI);
- Distance to an ‘A’ Road;
- Green Belt; and
- Loss of Best and Most Versatile Agricultural Land.

## What are the appraisal findings at this current stage?

Part 3 of the SA Report Update answers the question ‘What are appraisal findings at this current stage?’ by presenting an appraisal of the draft Plan. The appraisal is presented under the 10 SA ‘topic’ headings established through scoping. Consideration is also given to the ‘in-combination’ effects of allocating sites for housing, employment, gypsy and travellers, recreation/community, education, allotments, cemeteries, SANGs and safeguarded sites. The table below presents a summary of appraisal findings.

Topic	Summary appraisal findings
Housing	<p>It is assumed that, given the basic principle of supply and demand (that increases in supply should reduce the price), that the figure of 652 dwellings per annum (higher than the current Local Plan and more than has been delivered historically) should result in some impact on housing affordability. Other factors (such as mortgage availability and Bank of England interest rates) are likely to be more significant considerations in affecting housing affordability so it is unlikely that the issue of housing affordability would be fully addressed. It is concluded that the effect on housing affordability should be <b>positive</b> but not significant.</p> <p>The plan is unlikely to meet the full affordable housing need, resulting in a shortfall. This is likely to reduce access to affordable housing resulting in <b>negative effects</b> on affordable housing supply.</p> <p>There is policy support in the plan which should help to meet the identified need for accommodation for people with care and support needs, resulting in <b>positive effects</b>.</p>
Population and health	<p>The Draft Local Plan policies will help improve housing and employment provision, promote high quality design, and enhance the sustainability of the borough’s housing stock. Specifically, Policy 3 through the provision of specialist housing and the provision of suitable homes (background text) should have the effect of ensuring new homes are suitably flexible. However it is unclear whether there is provision for retrofitting existing homes to make them more suitable. This is likely to result in a <b>positive effect</b>, but not significant given the uncertainty over the magnitude of change the policy would deliver. Policy 7 should result in an <b>indirect positive effect</b> on a key influence on the elderly – fuel poverty. By making new development more energy efficient there should be a lower demand on fuel consumption both in the winter for heating and in the summer for cooling.</p> <p>Provision of new leisure facilities should help to address childhood obesity however this will depend on other factors including diet and children actually using those facilities. Other policies seek to increase walking and cycling and deliver green and blue infrastructure networks which should increase the potential for increased exercise. This should result in <b>positive effects</b> for childhood obesity however there is a high level of uncertainty over the level of take up and other external factors.</p>
Economy and employment	<p>Given that the preferred quantum of housing is at the bottom end of identified housing need, it is not possible to say that the plan would address housing (un)affordability in a way that would result in economic benefits, for example attract people into the borough to work. There are likely to be <b>positive effects</b> but these would be slight.</p> <p>In terms of educational attainment and qualifications, there may be indirect <b>positive effects</b> as a result of linking housing to education (through better transport links) and providing high quality student accommodation, but these effects are likely to be slight.</p>



Topic	Summary appraisal findings
Transport and accessibility	<p>An integrated approach to transport as set out in the draft plan should help to provide better connectivity and access to community facilities, district and local centres. This connectivity should help lead to a relative reduction in car use and greater accessibility; which should lead to <b>positive effects</b>.</p> <p>Development at Send and Ash/Tongham is likely to lead to <b>negative effects</b> on air quality, noise, human health and other ‘topics’. Measures will need to be put in place to ensure that air quality objectives are not exceeded and Air Quality Management Areas are not designated.</p>
Crime and safety	<p>Improvements to perceptions of crime are supported by the design policies of the Draft Local Plan, which seek to enhance the quality of the built environment. The Draft Local Plan’s focus on improving community cohesion will also help improve perceptions of security through helping to improve the satisfaction of residents with their neighbourhood as a place to live. The improvements are likely to result in <b>positive effects</b> on this issue. With regard to violent crime, clearly design policies can have an effect however, there is not enough detail at this stage to say more definitively what effects these might have in Guildford.</p>
Cultural heritage and landscape	<p>The allocations put forward by the Draft Local Plan are likely to have inevitable effects on landscape and townscape character locally. However, the policy approaches put forward through the Draft Local Plan will help limit the magnitude of the effects of new development areas and, at a number of locations in the borough, support enhancements to landscape and townscape quality.</p> <p>The Draft Local Plan presents specific considerations for protecting landscape quality in the Surrey Hills AONB which will help support the integrity of this area designated for its landscape value.</p> <p>The Draft Local Plan will also have <b>positive effects</b> for the historic environment through setting out a range of provisions relating to the fabric and setting of cultural heritage assets. The transportation policy (Policy 18) also has the potential to have <b>indirect positive effect</b> on landscape and townscape quality and the quality of the public realm through promoting alternative modes of transport to the private car.</p> <p>However, the overall effect of these policies needs to be weighed against the likely effects of new development proposals in the borough taken forward by the Draft Local Plan.</p>
Climate	<p>The policies set out in the draft plan should serve to further reduce the effects of flooding than the policies set out in the National Planning Policy Framework, specifically the provision of green and blue infrastructure through Policy 19. This is likely to have positive effects, but not significant.</p> <p>In terms of mitigation for climate change (i.e. reducing emissions and increasing energy efficiency), the Draft Local Plan supports the development of decentralised and renewable energy and district heating/cooling systems. The effects of these policies are likely to be <b>positive</b> but not significant.</p>

Topic	Summary appraisal findings
Soil and water	<p>No significant positive or negative effects are likely as a result of the Draft Local Plan in relation to the soil and water topics. The availability of previously developed land is limited in the borough. As such the Draft Local Plan is likely to lead to an inevitable loss of greenfield land, including agricultural land. In terms of soil resources, the significance of these effects is however likely to be restrained by the limited presence of the best and most versatile agricultural land in the borough.</p> <p>Effects on water availability will be limited by the provision of high standards of water efficiency within new development areas. In terms of water quality, this will be supported by the Infrastructure Schedule’s provisions for wastewater treatment and surface water run-off.</p> <p>The green and blue infrastructure policy (Policy 19) will have <b>positive effects</b> on soil and water resources in the borough through limiting the loss of soil and supporting water quality and quantity through the regulation of surface water run-off.</p>
Biodiversity	<p>New development areas proposed through the Draft Local Plan have the potential to have some negative effects on designated sites, habitats and species without mitigation measures. However the provisions of the habitats directive and the provisions of the NPPF will help ensure that internationally and nationally designated sites are afforded appropriate levels of protection. The Habitats Regulations Assessment (HRA) for the Draft Local Plan has stated that there should be no significant adverse effects on the Thames Basin Heaths Special Protection Area.</p> <p>The borough’s biodiversity resource will be supported by the blue and green infrastructure policy, which will have <b>positive effects</b> on biodiversity through supporting ecological networks in the borough. However, in the absence of a green infrastructure strategy, there would be no coordinated strategic approach to green infrastructure. Therefore the positive effects stated would more likely to be significant if the policy is supported by a stated aim to produce a green infrastructure strategy for the borough, or alternatively support a sub-regional green infrastructure strategy.</p>
Waste	<p>Policy 7 will have <b>positive effects</b> in relation this topic through minimising waste from construction and promoting the reuse of materials. This will support the minimisation of waste produced through the implementation of the Local Plan and promote sustainable waste management.</p>

Topic	Summary appraisal findings
Site appraisal: Housing	<p>The appraisal included a particular focus on the five largest sites; however, all the sites have been through the site appraisal process. All five of the sites have issues for health and wellbeing through distance to healthcare, distance to town centres and distances to primary and secondary schools. For the sites to be sustainable policies will need to be in place to ensure access to facilities is addressed.</p> <p>Only one of the largest five sites is at high risk of flooding. There are 14 sites that lie in an area of flood risk which represents a significant constraint on site development and solutions will need to be found to address this. All major sites are fully or partly on previously developed land and none of the sites has a significant constraint in terms of biodiversity or cultural heritage. Only one site would lead to the loss of high quality agricultural land.</p> <p>No site is within 400m of the Thames Basin Heaths SPA although 40 are within 400m-5km band. The Habitats Regulations Assessment states that there should be no significant adverse effects on the SPA. One site is less than 400m from a Site of Special Scientific Interest and three sites (including one major site – Blackwell Farm) are within the Surrey Hills Area of Outstanding Natural Beauty.</p> <p>One major site intersects with a listed building and an area of high archaeological potential. Eleven further sites are constrained in terms of Areas of High Archaeological Potential and five sites intersect with listed buildings.</p> <p>Three sites are over 2km from an ‘A’ road and 32 sites are within 500m. Seventeen sites are poorly located for access to a railway station; including four of the five largest. Two of the sites are over 2km from Key Employment Sites.</p>
Site appraisal: Employment	<p>Only one employment site is not on Previously Developed Land. The most constrained site in terms of biodiversity is Bisley Camp as it intersects with the Thames Basin Heaths SPA, a Site of Special Scientific Interest and sites of local importance. All employment sites are outside the Surrey Hills Area of Outstanding Natural Beauty.</p> <p>North Street, Portsmouth Road Surface Car Park, Tongham Triangle and Bisley all are constrained in terms of cultural heritage. Four sites are over 2km from the nearest railway station. Two sites are on Grade 2 Agricultural Land which is some of the best land in the borough.</p>
Site appraisal: Gypsy and travellers	<p>The gypsy and traveller sites generally perform poorly for the ‘health and wellbeing’ criteria with all sites scoring a ‘red’ for at least one criterion. Three sites are in areas of flood risk and nine of the sites are not on previously developed land. Two sites are within the Surrey Hills Area of Outstanding Natural Beauty and one site intersects with a local nature designation. Most sites appear to be poorly served by public transport; most notably rail access. Three sites perform poorly in terms of access to a Key Employment Site.</p>

Topic	Summary appraisal findings
Site appraisal: Recreation / community	The recreation and community sites are generally not very constrained. One site is adjacent to a European biodiversity site and a Site of Special Scientific Interest. Wisley also intersects with a Registered/Historic Parks and Garden and a Listed Building. Both sites are considerably far away from a rail station.
Site appraisal: Education	The education sites are relatively unconstrained. Only one site is not on previously developed land. For biodiversity there are a couple of issues with two sites in both a Special Protection Area and a Site of Special Scientific Interest. One site is constrained as it intersects with a listed building and two sites have poor access to a rail station.
Site appraisal: Allotments	One allotment is not on previously developed land and two other sites have poor accessibility.
Site appraisal: Cemeteries	There are two sites allocated for cemeteries. One is on a Special Protection Area and Site of Special Scientific Interest and the other is next to a locally designated wildlife site. Both sites have poor access to a railway station.
Site appraisal: SANGs	None of the Suitable Alternative Natural Greenspaces (SANGs) are located on previously developed land. One site intersects with a Scheduled Monument, one intersects with an Area of High Archaeological Potential and one site intersects with a Listed Building. SANGs are designed to draw recreation and leisure users away from the Thames Basin Heaths. Given this, accessibility is important. Eleven sites are a significant distance from a railway station and three are a significant distance from an 'A' road.
Site appraisal: Safeguarded sites	The safeguarded sites are not intended to be brought forward during the plan period; however there is the potential for them to come forward during the plan period should another site become available. Generally speaking, the safeguarded sites do not perform well for 'health and wellbeing'. All sites bar one score red for at least one criterion, with one site performing poorly for four out of five criteria. Three sites are partially constrained in terms of flood risk. None of the sites are on previously developed land however all sites perform well in terms of biodiversity. Two sites intersect with listed buildings. Four of the six sites score poorly for access to a rail station.

## What are the next steps (including monitoring)?

This Part of the report explains next steps that will be taken as part of plan-making / SA.

Once the period for public representations has finished the main issues raised will be identified and summarised by the Council, who will then consider whether it is appropriate to amend the plan (and update this SA Report) prior to submitting it to government for Examination alongside a summary of representations received.

At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies that modifications to the Plan are necessary, these will be subjected to consultation. Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

At the next stage (Regulation 19) there is a need to present 'a description of the measures envisaged concerning monitoring'.

In undertaking the SA to date, there have been no significant effects identified, either positive or negative. There have however been a number of other effects identified that are not significant. With this in mind, the following should be potential areas for monitoring:

- Housing affordability ratio;
- Affordable housing need and shortfall;
- Standard of accommodation for people with care and support needs;
- Childhood obesity;
- Adults with no qualifications;
- Air quality;
- Violent crime; and
- Perception of crime.