

Sustainability Appraisal (SA) of the Guildford Borough Local Plan

SA Report Update

Non-technical Summary

June 2017

DOCUMENT DETAILS

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1	June 2017	Non-technical summary of the SA Report <u>Update</u> published alongside the 'Targeted Changes' consultation document	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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Introduction

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

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

The Local Plan is at an advanced stage of preparation, with the 'proposed submission' version having been published for consultation in June 2016, under Regulation 19 of the Local Planning Regulations. At the current time, 'targeted changes' to the proposed submission version are published for consultation.

An SA Report was published alongside the Proposed Submission Plan in 2016, and at the current time an SA Report update is published alongside the Targeted Changes consultation document, in order to inform the consultation, and subsequent plan-making work (see the discussion of 'next steps', below).

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

Structure of the SA Report Update / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
 - i.e. in the run-up to preparing the proposals that are published for consultation.
2. What are the appraisal findings at this current stage?
 - i.e. in relation to the proposals that are published for consultation.
3. What are the next steps?

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

What's the scope of the SA?

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

Sustainability issues and objectives (the SA framework)
Sustainability objectives

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

PLAN-MAKING / SA UP TO THIS POINT

An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

As such, Part 1 of the SA Report Update explains how work was undertaken to develop and appraise a ‘reasonable’ range of alternative approaches to site allocation, or ‘spatial strategy alternatives’, ahead of finalising Targeted Changes.

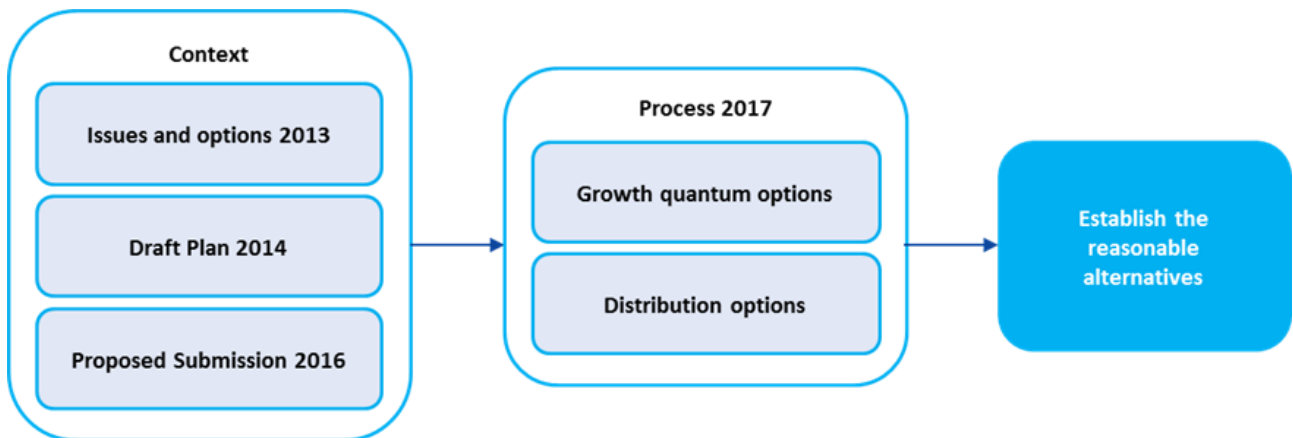
Specifically, Part 1 of the report -

- 1) explains the process of **establishing** the reasonable spatial strategy alternatives;
- 2) presents the outcomes of **appraising** the reasonable spatial strategy alternatives; and
- 3) explains reasons for **establishing** the preferred spatial strategy option, in light of the appraisal.

Establishing reasonable alternatives

The main report explains how reasonable alternatives were established subsequent to a lengthy process of gathering evidence and examining options. The process can be summarised in a flow diagram (see below).

Establishing the reasonable alternatives



The reasonable alternatives ultimately arrived at are presented in **two tables** below – one presenting the alternatives in detail, and the second presenting them in summary. The main report also presents the alternatives across a series of **maps**.

The reasonable spatial strategy alternatives 2017 (N.B. higher growth options are highlighted in red)

Location within the spatial hierarchy	'Given' or variable?	The reasonable spatial strategy alternatives							
		Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8
Tier 1 - Guildford town centre		1150	1150	1150	1150	1150	1150	1150	1150
Tier 2 - Guildford urban area		1368	1368	1368	1368	1368	1368	1368	1368
Tier 3 - Ash and Tongham urban area		79	79	79	79	79	79	79	79
Tier 4 - Within village built up area (BUA)		140	140	140	140	140	140	140	140
Tier 5 - 'Gap' sites	'Given'	245	245	245	245	245	245	245	245
Tier 6 - PDL in the Green Belt		199	199	199	199	199	199	199	199
Tier 8 - Wisley Airfield		2000	2000	2000	2000	2000	2000	2000	2000
Tier 7 - CBGB		1146	1146	1746	1146	1746	1146	1746	1746
		1500	1500	1500	1500	1500	1500	1500	1500
		1700	1700	1700	1700	1700	1700	1700	1700
		150	150	150	150	150	150	150	150
		0	0	0	1000	0	1000	1000	1000
		400	400	400	400	400	400	400	400
		355	355	355	355	355	355	355	355
		40	40	40	40	40	40	40	40
		0	100	0	0	100	100	0	100
		0	100	0	0	100	100	0	100
		0	200	0	0	200	200	0	200
		0	80	0	0	80	80	0	80
		625	625	625	625	625	625	625	625
		90	90	90	90	90	90	90	90
		2413	2413	2413	2413	2413	2413	2413	2413
	Windfall								
	Rural exceptions								
	Completions and commitments								
		13600	14080	14200	14600	14680	15080	15200	15680
	Total growth in homes provided for in the plan period								
	% buffer over objectively assessed housing need (OAHN)	9.4	13.3	14.3	17.5	18.1	21.4	22.3	26.2

The reasonable spatial strategy alternatives 2017 in summary

Option	Givens ¹	Variables	Quantum	Relationship to OAHN
1		Lower growth options	13,600	+ 9.4%
2		Higher growth option for variable 3.	14,080	+ 13.3%
3		Higher growth option for variable 1	14,200	+ 14.3%
4	~8,317	Higher growth option for variable 2	14,600	+ 17.5%
5		Higher growth option for variables 1 and 3	14,680	+ 18.1%
6		Higher growth option for variables 2 and 3	15,080	+ 21.4%
7		Higher growth option for variables 1 and 2	15,200	+ 22.3%
8		Higher growth option for all three variables	15,680	+ 26.2%

Where the variables are as follows -

- 1) Countryside beyond the Green Belt (CBGB) - 1,146 or 1,746 dwellings
- 2) Green Belt urban extensions to Guildford - 3,350 or 4,350 dwellings
- 3) Green Belt urban extensions to villages - 795 or 1,275 dwellings

¹ The 'givens' figure comprises housing completions and commitments (i.e. planning permissions) since the start of the plan period; an assumption for windfall sites (i.e. sites that gain planning permission despite not being allocated in the plan, on the basis that they are in accordance with plan policy); an assumption for rural exception sites (i.e. sites that gain planning permission despite not being allocated in the plan, on the basis that they will meet a specific identified housing need attributed to a rural community); and a single proposed approach to growth at the following locations –

- Guildford town centre
- Guildford urban area
- Ash and Tongham urban area
- Within village built up area (BUA)
- Within proposed village boundaries, outside BUA
- PDL in the Green Belt
- Wisley Airfield

Appraising reasonable alternatives

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

Summary alternatives appraisal findings

Topic	Rank of performance / categorisation of effects							
	Option 1 OAN + 9.4%	Option 2 OAN + 13.3%	Option 3 OAN + 14.3%	Option 4 OAN + 17.5%	Option 5 OAN + 18.1%	Option 6 OAN + 21.4%	Option 7 OAN + 22.3%	Option 8 OAN + 26.2%
Biodiversity	★1	2	2	3	3	6	6	7
Climate change	4	4	3	2	3	2	★1	★1
Communities	★1	2	2	★1	3	3	3	4
Economy	8	7	6	5	4	3	2	★1
Employment	2	5	5	★1	5	3	3	4
Flooding	★1	2	★1	★1	2	2	★1	2
Historic environment	★1	2	3	4	4	5	6	7
Housing	8	7	6	5	4	3	2	★1
Land	★1	2	3	4	5	6	7	8
Landscape	★1	2	3	4	5	6	7	8
Transport	★1	2	2	2	3	3	3	4
Water	★1	★1	2	★1	2	★1	2	2

N.B. It was not possible to differentiate the alternatives, or identify significant effects, in terms of the following topics: Health; Poverty; Brownfield; Rural; and Safety. As such, these rows are removed from the table.

Topic	Rank of performance / categorisation of effects							
	Option 1 OAN + ~10%	Option 2 OAN + ~14%	Option 3 OAN + ~15%	Option 4 OAN + ~18%	Option 5 OAN + ~19%	Option 6 OAN + ~22%	Option 7 OAN + ~23%	Option 8 OAN + ~27%

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.

Establishing the preferred option

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. The following text is provided by the Council -

- **Biodiversity** - The appraisal highlights the Council's preferred option, as a restrained approach to growth, as performing most favourably; however, the appraisal highlights the likelihood of 'significant negative effects' nonetheless. 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. The plan performs well from a perspective of supporting walking, cycling and public transport, in particular through maximising opportunities in Guildford town centre, supporting a Sustainable Movement Corridor and directing growth to locations with access to a train station (and indeed delivering two new stations), hence there will be the opportunity to reduce average per capita CO2 emissions from transport.
- **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, the Council believes that a positive strategy for economic growth is set to be put in place, and the Council notes M3 LEP's support for providing housing in-line with the SHMA assigned OAHN figure (as understood from M3 LEP's representation on the 2016 Proposed Submission Plan). Whilst additional housing in Guildford Borough might in theory support realisation of economic growth opportunities within the FEMA, in practice it is not clear that this would be the case, as 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). 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.
- **Land** - The appraisal highlights the Council's preferred option, as a restrained approach to growth, as performing most favourably; however, the appraisal highlights the likelihood of 'significant negative effects' nonetheless. 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** - The appraisal highlights the preferred option as performing well; nevertheless, it is worthwhile commenting here, given the sensitivities that exist locally. 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. Capacity has been reduced from 2,250 to 1,800 homes, and whilst the site still requires an access off the A31, the reduced capacity now enables the use of the existing access road, Down Place. This road, which runs through both AONB and AGLV, and will require upgrading; however, this can be achieved whilst mostly retaining and enhancing the historic tree cover present along its length.

- **Housing** - The preferred option performs well as it will put in place a strategy for meeting the borough's 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. It is far from clear that Guildford is relatively unconstrained / suited for growth above OAN in the sub-regional context.

This is the finding of the SA work, but it is also worth noting that the Council's work to consider safeguarding options has also led to the same conclusion. The Council has looked into safeguarding sites, in addition to allocations, in order to negate the need for a Green Belt review until 'well beyond the plan period' (in-line with Government guidance); however, no opportunities are apparent. Given that Government Guidance advocates safeguarding land 'between the urban area and the Green Belt', which in practice would mean safeguarding sites on the edge of the Guildford urban area, considerations include -

- Major constraints to the north (SPA) and south (AONB) would necessitate safeguarding land to the east and/or west, resulting in an oblong-shaped urban area.
 - There is inevitably a limit to the extent that the urban area can expand before it would begin to merge with surrounding villages.
 - Available land around the urban area is high sensitivity Green Belt.
- **Transport** - The appraisal highlights the preferred option as performing well; nevertheless, it is worthwhile commenting here, given the sensitivities that exist locally. 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. Whilst the modelling work has not been updated to reflect the 2017 preferred option, it has been subject to a high-level review, and the lower growth strategy should ensure that the conclusions of the 2016 modelling work still stand. Furthermore, plans for infrastructure delivery have been reviewed, revised and where necessary strengthened since 2016, notably through revised wording within Policy ID1 (Infrastructure and delivery), and Appendix C of the Infrastructure Schedule contains the updated key infrastructure requirements. For example, scheme LRN25, which relates to the Waverley Borough Council draft Local Plan site allocation at Dunsfold Aerodrome, has been added.

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. It is noted that modelling work in 2016 led to the conclusion: *"There are several instances of roads showing unexpected increases... The increase on Polesden Lane at Send Marsh appears to be due to the traffic calming measures put in place to complement the new A3 slips at Burntcommon. Given that stretches of it are narrow and only allow vehicles to pass in a single direction at one time, it is unlikely that such increases will materialise. But it may be that this road will need to be monitored if the slips are implemented and traffic calming introduced if required.*

APPRAISAL FINDINGS AT THIS STAGE

Part 2 of the SA Report presents an appraisal of the Proposed Submission Plan, as it stands at the current time, i.e. the Proposed Submission Plan 2016 plus Targeted Changes.

Appraisal findings are presented as a series of narratives under the 'SA framework' headings. The conclusion from each narrative is repeated here.

N.B. The main report also includes a commentary on Targeted Changes in isolation, under each of the SA framework headings. However, those commentaries are not repeated here, for brevity.

Biodiversity

The proposed spatial strategy gives rise to concerns. A lower growth strategy is not necessarily suggested, recognising that other areas in the sub-region are also constrained, but an alternative distribution strategy could possibly be foreseen whereby there is less impact on locally important sites (SNClS), and also less risk to the SPA (albeit it is recognised that HRA has established no likelihood of significant adverse effects).

A range of important policy measures are proposed, and it is apparent that a robust strategy is set to be implemented in respect of SANG delivery (i.e. there can be confidence in the quantity of SANG provision, as well as the quality and maintenance of that over time). Policy for specific sites has responded to biodiversity constraints; however, there is the potential to add further detail to policy requirements (and a recommendation is made to this effect, particularly in relation to the proposed strategic allocation at Wisley Airfield).

On balance, taking account of the proposed spatial strategy alongside avoidance and mitigation measures, **significant negative effects are not predicted**. It is noted that Natural England was content with the proposed strategy from 2016 (although Surrey Wildlife Trust and other parties did raise concerns), and the proposed targeted changes are not likely to change this position (see discussion below).

Climate change

The plan leads to a reasonably strong likelihood of reduced average per capita CO₂ emissions from the built environment, given a focus on strategic scale schemes and the policy requirements set to be put in place (e.g. district heating options should be explored at residential only developments over 300 dwellings in size), and the lack of site-specific detail is not thought to be a problem (i.e. opportunities can probably be fully realised at the planning application stage). The plan performs well; however, **significant positive effects are not predicted**, recognising that climate change mitigation is a global issue.

Communities

Assuming appropriate phasing of infrastructure delivery alongside housing growth (as required by Policy ID1), the plan should lead to a situation whereby development leads to 'sustainable' new communities and also wide ranging benefits to existing communities (e.g. in respect of secondary school provision). Having said this, it is recognised that some aspects of the strategy are less than ideal, and many uncertainties exist, including in respect of traffic congestion. **Significant positive effects are predicted**, but with some uncertainty.

Economy and employment

The plan performs well on the basis that identified opportunities are set to be capitalised upon, including growth of the Guildford knowledge-based sector. The 2016 appraisal concluded significant positive effects, and the 2016 plan was broadly supported by the Enterprise M3 Local Enterprise Partnership (LEP). The current plan reflects a lower growth strategy, but still a strategy of providing for the SHMA assigned OAHN figure and providing for the employment land target assigned by the ELNA. As such, **significant positive effects are predicted**.

Flooding

The spatial strategy reflects a sequential approach to avoiding flood risk wherever possible. Three sites in Guildford town centre will involve development within an area of flood risk; however, vulnerable uses (e.g. residential) will not be at risk, and, in all cases, the proposed use is needed and suited to the site, i.e. development will bring wider benefits. The plan performs well; however, **significant effects are not predicted**. Whilst the absence of a plan – i.e. the baseline situation - could mean greater risk of vulnerable uses coming forward in areas of flood risk, particularly Guildford town centre, it is not clear this would be the case.

Health

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

Historic environment

The spatial strategy will avoid direct impacts to sensitive village conservation areas (although there is some risk at Wisley, which abuts the Ockham Conservation Area), although the risk for indirect impacts as a result of increased traffic remains. Other areas/assets (e.g. Guildford town centre Conservation Area, and Guildford Cathedral) will likely be protected through site-specific policy (guiding design and layout), and there may be some opportunities for enhanced appreciation of the historic environment. Thematic policy is also of note here, in particular policy for Guildford town centre and that addressing the visitor/leisure experience. The plan performs well, and it is noted that Historic England stated their support for the Proposed Submission Plan in 2016; however, **significant effects are not predicted**.

Housing

The plan sets out to meet the objectively assessed housing need (OAHN) figure identified for the borough by the SHMA, and as such **significant positive effects** are predicted. However, the decision has been taken not to deliver a higher level of growth in order to address under-supply at the housing market area (HMA) scale (arising from Woking). There is also some uncertainty regarding the housing trajectory, and specifically the supply of housing in the early part of the plan period. Finally, in respect of the policy approach, it is clear that a tailored approach is set to be implemented in respect of affordable housing, student accommodation, specialist accommodation (for example, for older people), travellers and houses in multiple occupation.

Land

The plan will result in significant loss of best and most versatile agricultural land, hence **significant negative effects** are predicted, although it is noted that the plan seeks to maximise brownfield development.

Landscape

The plan will result in limited impacts to the nationally important AONB, the sub-regionally important AGLV and Green Belt identified as more sensitive by the Green Belt and Countryside Study, despite these constraints being widespread. Also, a notably proactive approach is being taken around the Ash and Tongham area, i.e. within the 2% of the borough that is currently Countryside Beyond the Green Belt (CBGB). On balance, this approach to the growth within the CBGB is supported from a landscape perspective, albeit it is recognised that a decision not to maximise growth here leads to increased pressure on the Green Belt.

Finally, it is noted that site-specific policy is set to respond to a number of issues and opportunities, most notably around Ash and Tongham (where masterplanning and layout will be of critical importance, if the separate village identity of Ash Green is to be retained) and at the two previously developed sites in the AONB that are proposed for redevelopment.

Given the extent to which landscape has been applied as a constraint, and recognising that the baseline situation could be one whereby development will come forward in an unplanned way, it is appropriate to conclude **significant positive effects**.

Poverty and social exclusion

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

Previously developed land

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

Rural economy

Perhaps the most notable effects will arise as a result of Policy E5 (Rural economy), which aims to encourage rural enterprise, to the extent to which it is possible through the planning system. It is not clear that the spatial strategy will have notable effects, although it is noted that Wisley Airfield (proposed 2,000 home mixed use development) is in a relatively rural location. **Significant effects are not predicted.**

Safety and security

Thematic policy and site-specific policy established through the plan will have a major influence on masterplanning, layout, landscaping and design, which in turn will have implications for safety and perceptions of safety. The plan performs well; however, **significant effects are not predicted.**

Transport

Whilst transport/traffic constraints are widespread across Guildford Borough, it is apparent that the spatial strategy has been developed in order to reflect variations in constraint and opportunity, most notably through focusing growth at locations along a Sustainable Movement Corridor in the urban area of Guildford, and at locations in proximity to a rail station. Policy commitments regarding the phasing of infrastructure are also of critical importance.

A lower growth strategy is proposed than was the case in 2016, when the Strategic Highways Assessment concluded: "The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the Proposed Submission Local Plan together with the key highway schemes, there will not be a severe impact on the local and strategic highway network..." As such, **significant negative effects are not predicted.** However, there could be a risk that the change in distribution leads to localised traffic over and above that identified through the 2016 modelling work.

Waste

The spatial strategy has limited or no implications for sustainable waste management. It should be possible to achieve good waste management as part of all development schemes, and Policy D2 sets out to ensure that opportunities are realised. The plan performs well; however, **significant effects are not predicted.**

Water quality and resources

On the basis of the evidence available it is difficult to envisage the spatial strategy having significant implications for the water environment / water resources, and it should be the case that the policy framework in place (including policy dedicated to the achievement of objectives for the River Wey catchment) will help to ensure the achievement of WFD objectives. **Significant effects are not predicted.**

SA conclusion at this current stage

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:²

- 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.

Also, with a view to improving the performance of the plan, the SA process has involved giving careful consideration to 'reasonable alternatives', most notably in relation to the spatial strategy (see discussion above).

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, above).

Conclusions on Targeted Changes

Targeted Changes have a range of implications, as discussed above under each of the sustainability topic headings; however, the effect of Targeted Changes is not to change any of the 'headline' conclusions reached in the 2016 SA Report. This is particularly because the proposal to meet objectively assessed needs is unaltered.

² It is a regulatory requirement that the SA Report must include recommendations, to be addressed subsequent to the consultation.

Next steps

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

Plan finalisation

Subsequent to publication, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be ‘sound’. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination.

At Examination a government appointed Planning Inspector will consider representations (in addition to the SA Report and other evidence) before determining whether the plan is sound (or requires modifications).

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

Monitoring

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

With regards to monitoring, the plan document states (Chapter 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...”

The table below lists a number of indicators that, it is suggested, are of particular importance from an SA perspective, given appraisal findings presented above.

Proposed 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 compared to the identified mix in the Strategic Housing Market Assessment	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 homes/businesses linked to a network.
Walking, cycling, bus and rail modal share for travel to work journey in Guildford borough	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 species of conservation importance.