



# Sustainability Appraisal of the Waverley Local Plan Part 1



Interim SA Report

September 2014

REVISION SCHEDULE					
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## INTRODUCTION

## 1 BACKGROUND

- 1.1.1 URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Waverley Local Plan Part 1. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Local Plan is a legal requirement.<sup>1</sup>

## 2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.<sup>2</sup>
- 2.1.2 The Regulations require that a report - which for the purposes of SA is known as **the 'SA Report'** – is published for consultation alongside the draft plan and then taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 Essentially, the SA Report must *'identify, describe and evaluate'* the likely significant effects of implementing *'the plan, and reasonable alternatives'*. More specifically, the SA Report must essentially answer **four questions**:
1. What's the scope of the SA?
  2. What has Plan-making / SA involved up to this point?
    - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration. 'Reasonable alternatives' must have been appraised.
  3. What are the appraisal findings at this current stage?
    - i.e. in relation to the draft plan.
  4. What happens next?

## 3 THIS INTERIM SA REPORT

- 3.1.1 At the current stage of plan-making the Council is not consulting on a complete Draft Plan. Rather, the Council is consulting on 'housing scenarios and other issues'. This Interim SA Report is produced (voluntarily) with the intention of informing the consultation and subsequent preparation of the Draft ('Proposed Submission') Plan.

### Structure of this Interim SA Report

- 3.1.2 Despite this being an 'Interim' SA Report (i.e. a document that does not need to provide the information legally required of the SA Report) it is nonetheless helpful to structure this report according to the four questions listed above.

<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 centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.

<sup>2</sup> Directive 2001/42/EC

## **PART 1: WHAT'S THE SCOPE OF THE SA?**



## 4 INTRODUCTION (TO PART 1)

4.1.1 In order to introduce the reader to the scope of the SA, this 'part' of the Report answers the following questions:

- What's the Plan seeking to achieve?
- What's the sustainability *context*?
- What's the sustainability *baseline*?
- What are the key issues and objectives that should be a focus of SA?

4.1.2 **Chapter 5** answers the first question by listing the objectives of Local Plan.

4.1.3 The other three scoping questions are answered in **Chapters 6 - 8**, with each question answered for the following nine sustainability 'topics':

- |                             |   |
|-----------------------------|---|
| • Biodiversity              | • Housing   |
| • Climate change mitigation | • Landscape   |
| • Community and well-being  | • Soils and other natural resources                   |
| • Economy                   | • Water, flood risk & other climate adaptation issues |
| • Heritage and townscape    |   |

4.1.4 The nine sustainability topics were identified in-light of those suggested by the SEA Regulations<sup>3</sup>, the list of sustainability objectives identified through scoping work undertaken for the Waverley Core Strategy<sup>4</sup>, and also initial understanding of the objectives of the Waverley Local Plan Part 1 (i.e. initial understanding of the 'plan scope').

## 4.2 Consultation on the scope

The Regulations require that: 'When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies'. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.<sup>5</sup> As such, a Scoping Report was published for consultation in March 2014. Comments received were taken into account and are reflected in an updated version of the Scoping Report, which is at: [www.waverley.gov.uk/newlocalplan](http://www.waverley.gov.uk/newlocalplan).

N.B. Stakeholders are also welcome to comment on the SA scope at the current time. Any comments received will be taken into account when undertaking SA work in the build-up to the Draft ('Proposed Submission') Plan / SA Report consultation.

<sup>3</sup> Schedule 2 suggests a focus on 'issues such as' biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, and landscape.

<sup>4</sup> Waverley Council were progressing a Core Strategy up until 2014, when the decision was made to cease work on a Core Strategy and instead progress a 'Local Plan'.

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

## 5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

- 5.1.1 Work to prepare the Local Plan Part 1 will build on the foundations laid by the withdrawn Core Strategy. The Core Strategy was withdrawn in October 2013, subsequent to a recommendation made by the Planning Inspectorate.
- 5.1.2 Once in place, the Local Plan Part 1 will establish a spatial strategy for growth and change in the Borough over the next 15 years, allocate strategic sites and establish the policies against which planning applications will be determined. A Local Plan Part 2 will be prepared subsequently, allocating non-strategic sites and supplementing thematic policy.
- 5.1.3 The Local Plan Part 1 will be in general conformity with the National Planning Policy Framework (NPPF), and in-line with planning legislation and regulations including the Duty to Co-operate introduced in the 2011 Localism Act. The Duty to Co-operate places a legal duty on the Council to engage constructively to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters. Neighbouring authorities, with whom Waverley has a duty to cooperate, include Guildford Borough Council, Mole Valley District Council, Horsham District Council, Chichester District Council, South Downs National Park, East Hampshire District Council, Hart District Council and Rushmoor Borough Council.
- 5.1.4 Plan objectives will be formally agreed subsequent to the current consultation. It is likely that, in many respects, objectives will be similar to those of the withdrawn Core Strategy, which were to:
1. Contribute to the achievement of sustainable development, having regard to the guiding principles in the UK Sustainable Development Strategy: "Securing the Future".
  2. Contribute to the delivery of sustainable communities, by directing most new development to the main settlements of Farnham, Godalming, Haslemere and Cranleigh, where there is the best available access to jobs, services and other facilities.
  3. Support the provision of new development in villages where it meets identified local needs or helps to sustain local facilities and to support the sustainable growth and expansion of rural businesses.
  4. Deliver planned development in areas of significant change, including planned development in Hindhead that meets the needs of residents, businesses and visitors, as a result of the changes brought about by the new A3 tunnel scheme.
  5. Ensure that cross boundary impacts arising from development or infrastructure provision are considered and addressed.
  6. Support measures that promote sustainable transport, including improvements to public transport and improved facilities for pedestrians and cyclists.
  7. Maintain and protect the Green Belt in accordance with national policy, including the presumption against inappropriate development in the Green Belt.
  8. Protect the countryside for its intrinsic character and beauty and as a recreational asset, including its visitor facilities, and, where appropriate, promote its continued recreational use.
  9. Support the delivery of additional homes in Waverley to meet identified needs.
  10. Deliver a balance of housing and employment growth that takes account of both the need for additional housing and the need to safeguard and, if necessary, enlarge the supply and mix of premises available to meet the needs of local businesses.



11. Ensure that adequate provision is made for new or improved social, physical and green infrastructure to meet the needs of the increased population and additional demands arising from employment related development.
12. Deliver an increase in the overall stock of affordable housing and to ensure that as far as possible the type and tenure of affordable housing meets identified local needs.
13. Support the delivery of a range of sizes and types of new homes, including homes and accommodation to meet the needs of specific users including older people and first time buyers.
14. Support the delivery of new and improved commercial premises in order to meet the needs of businesses in Waverley, both within the main settlements and in rural areas.
15. Support the vitality and viability of the centres of Farnham, Godalming, Haslemere and Cranleigh, taking account of the difference between each of the centres and the different roles that they play.
16. Ensure that provision is made to meet the leisure, recreation and cultural needs of the community.
17. Safeguard and enhance the rich historic heritage and the diverse and attractive landscapes and townscapes in Waverley, and ensure that new development takes proper account of the character and distinctiveness of the area in which it is located.
18. Ensure that the design, form and location of new developments contribute to the creation of sustainable communities that are attractive, safe and inclusive.
19. Protect and enhance Waverley's biodiversity, including its wildlife species and their habitats, both on designated sites and undesignated sites.
20. Reduce the emissions that contribute to climate change and minimise the risks resulting from the impact of climate change.
21. Ensure that new development is located and designed to manage and reduce its risk from flooding.

- 5.1.5 Understanding of plan objectives have evolved since 2013 in one respect in particular. Specifically, understanding of the critical importance of planning for **objectively assessed housing needs** has evolved in light of the Planning Inspectorate's preliminary conclusions on the Core Strategy, as well as Planning Inspectorate reports on various other Local Plans around the Country. A draft Strategic Housing Market Assessment (SHMA) has recently been produced, and it is essentially now an objective of the Local Plan to address its findings.

## 5.2 What's the plan not seeking to achieve?

- 5.2.1 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the development management process). The strategic nature of the plan is reflected in the scope of the SA.

## 6 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

### 6.1 Introduction

6.1.1 This chapter introduces key sustainability context messages in relation to broad problems / issues; and objectives. The source of context messages includes:

- The National Planning Policy Framework (NPPF), which constitutes the Government's view of what sustainable development in England means in practice for the planning system.
- Other Government reports; and
- Reports prepared by other (e.g. third sector) organisations.

6.1.2 A selection of context messages is presented below. A more comprehensive (and fully referenced) context review can be found within the SA Scoping Report. The points listed below are tailored to reflect the subject of appraisal/consultation at the current time.

### 6.2 Biodiversity

- The NPPF and other policy documents emphasise the need to protect important sites, plan for green infrastructure and plan for ecological networks and at 'landscape scales' taking account the anticipated effects of climate change. National policy reflects the commitment to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.
- Government retained policy NRM6 when revoking the South East Plan in March 2013. The policy requires new residential development which is likely to have a significant effect on the ecological integrity of Thames Basin Heaths SPA to demonstrate adequate mitigation. The Thames Basin Heaths Avoidance Strategy requires the development schemes provide or contribute towards Suitable Alternative Natural Greenspace (SANG) and a programme of strategic access management and monitoring.
- The Surrey Strategic Partnership Plan recognises importance of Surrey's landscape and habitats, not only given biodiversity considerations, but also given the need to attract tourism and support vibrant local economies. Similarly, the Government's Natural Environment White Paper (NEWP) emphasises the importance of a healthy natural environment to sustained economic growth, prospering communities and personal well-being.

### 6.3 Climate change mitigation

- In its 2007 strategy on climate change, the European Commission recommends a package of measures to limit global warming to 2° Celsius. On energy, the Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.
- In the UK the Climate Change Act 2008 has set legally binding targets on reducing greenhouse gas emissions in the UK by at least 80% by 2050 and 34% by 2020 against the 1990 baseline.
- The NPPF emphasises that the key role for planning in securing radical reductions in GHG, including in terms of meeting the targets set out in the Climate Change Act 2008. Plan-making should, for example, support efforts to -
  - Reduce transport emissions, by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport.
  - Deliver infrastructure such as low-carbon district heating networks.
  - Increase energy efficiency in the built environment.

## 6.4 Community & wellbeing

- A core planning principle is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'. The NPPF also emphasises the need to: facilitate social interaction and creating healthy, inclusive communities; promote retention and development of community services / facilities; ensure access to high quality open spaces and opportunities for sport and recreation; and promote vibrant town centres.
- Planning for good health is high on the agenda, in light of the 'Marmot Review' of health inequalities in England, which concluded that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities'. Planning for good health can compliment planning for biodiversity (green infrastructure) climate change mitigation (walking/cycling).
- As part of planning for good health, there is also a need to consider air quality. Planning decisions should ensure that any new development does not impact on identified Air Quality Management Areas (AQMAs) drawing on the local air quality action plan.

## 6.5 Economy

- The planning system can make a contribution to building a strong, responsive economy by 'ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure'. The NPPF also emphasises the need to:
  - Capitalise on 'inherent strengths', and meet the 'twin challenges of global competition and of a low carbon future'.
  - Support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.
  - Support competitive town centre environments, and only consider edge of town developments where they have good access and there will not be detrimental impact to town centre viability in the long term.
- The Enterprise M3 Local Enterprise Partnership (LEP) identifies key challenges to future growth, including: problems of unreliable transport connections by road and rail; house building for local communities not keeping pace with the needs of the economy; and a shortage of larger (25 hectare plus) sites.
- Surrey Future brings together Surrey's local authorities and business leaders to agree the investment priorities to support the county's economy. Surrey Future has identified the top transport infrastructure priorities for Surrey in order to help drive economic growth in Surrey and beyond. The A3 corridor is a priority, as are 23 schemes to tackle areas of congestion in town centres, at key junctions and within strategic corridors.

## 6.6 Heritage & townscape

- There is a need to set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk. Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- English Heritage's Heritage at Risk National Strategy sets out to 'protect and manage the historic environment, in order to reduce the overall number of heritage assets that are at risk or vulnerable of becoming so'. A target is the removal of a quarter of nationally designated heritage at risk assets from the baseline 2010 Register by April 2015.
- There is a need to look for opportunities within Conservation Areas, and within areas that comprise the setting of heritage assets, to enhance or better reveal their significance.

## 6.7 Housing

- The NPPF requires that authorities meet the full, objectively assessed need for market and affordable housing wherever possible. They should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The SHMA should identify the scale and mix of housing and the range of tenures (including affordable housing) that the local population is likely to need over the plan period.
- The NPPF recognises that larger developments are sometimes the best means of achieving supply of new homes. The Town and Country Planning Association advocate well planned new communities that enable economies of scale, and better use of infrastructure.
- Joseph Rowntree Foundation's International review of land supply finds that the Green Belt has successfully prevented urban sprawl – but at a price. Evidence from other countries suggests that it should be operated more flexibly, with boundaries revisited regularly.

## 6.8 Landscape

- The European Landscape Convention (ELC) came into force in the UK in March 2007. The ELC defines landscape as: "An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors." It recognises that the quality of all landscapes matters – not just those designated as 'best' or 'most valued'.
- The NPPF refers to the need to protect and enhance valued landscapes and identifies that major development should be avoided in designated areas, unless in the public interest.
- The Surrey Hills Area of Outstanding Natural Beauty (AONB) Management Plan identifies the following special qualities and key landscape features that are the basis for the Surrey Hills being designated a nationally important: Hills and Views; Woodland; Heathland; Commons; Chalk Grassland; Water (Rivers and Ponds); Agricultural land; Boundary Features; Parkland and Historic Landscape Features; Routeways (Country Lanes and Rights of Way); Settlements and Built Heritage; Tranquillity and Inspiration.

## 6.9 Soils & other natural resources

- The NPPF recognises the need to: Protect and enhance soils and associated watercourses; Prevent new or existing development from contributing to or being adversely affected by the presence of unacceptable levels of soil or water pollution or land instability; and Remediate 'despoiled, degraded, derelict, contaminated and unstable land', where appropriate.
- There is a need to encourage the effective use of land through the reuse of land which has been previously developed, provided that this is not of high environmental value. The NPPF requires an approach to housing density that reflects local circumstances.
- The NPPF emphasises the 'great importance' of Green Belts and encourages local authorities to plan positively to enhance beneficial use, with inappropriate development in these areas not to be approved 'except in very special circumstances'.
- Planning decisions should take sufficient account of soil quality, particularly where 'best and most versatile' agricultural land is involved.

## 6.10 Water, flood risk, and other climate change adaptation issues

- Take account of the effects of climate change in the long term, taking into account flood risk, coastal change, water supply constraints and changes to biodiversity and landscape. Planning authorities are encouraged to 'adopt proactive strategies' to adaptation.
- Within the Thames River Basin District, urban growth can have 'a wide range of impacts on virtually all aspects' of the water environment. Badly managed growth could cancel out positive achievements; however, development can also enable improvements to the water environment. Sustainable Drainage Systems (SuDS) are encouraged.

## 7 WHAT'S THE SUSTAINABILITY 'BASELINE'?

### 7.1 Introduction

7.1.1 The baseline review is about expanding on the consideration of problems/issues identified through context review so that they are locally specific. Once the baseline has been established it can be used as a 'benchmark' against which to assess effects (of alternatives and the draft plan).

7.1.2 A selection of baseline review messages is presented below. A more comprehensive (and fully referenced) review can be found within the SA Scoping Report. The points listed below are tailored to reflect the subject of appraisal/consultation at the current time.

### 7.2 Biodiversity

- There are significant biodiversity assets within and in close proximity to the Borough, including a number of European, nationally and locally designated sites.
- There are three Special Protection Areas (SPAs) designated under the European Birds Directive: Thursley, Hankley and Frensham Commons (also known as Wealden Heaths Phase I), part of Wealden Heaths Phase II and a small part of the Thames Basin Heaths SPA. Only 80 hectares of the Thames Basin Heaths SPA lies within Waverley, to the north of Farnham, but its zone of influence extends 5km from its boundary and therefore is a consideration across most of Farnham. Similarly, the zone of influence from the Wealden Heaths Phase II covers much of the central part of the Borough including areas around Farnham, Godalming and Haslemere. Waverley also contains all or part of some 15 Sites of Special Scientific Interest (SSSIs).
- Various Biodiversity Opportunity Areas intersect with the Borough, with locally designated or non-designated woodlands and hedgerows playing an important role in terms of 'connecting' important habitat patches. Surrey is the most wooded county in England.

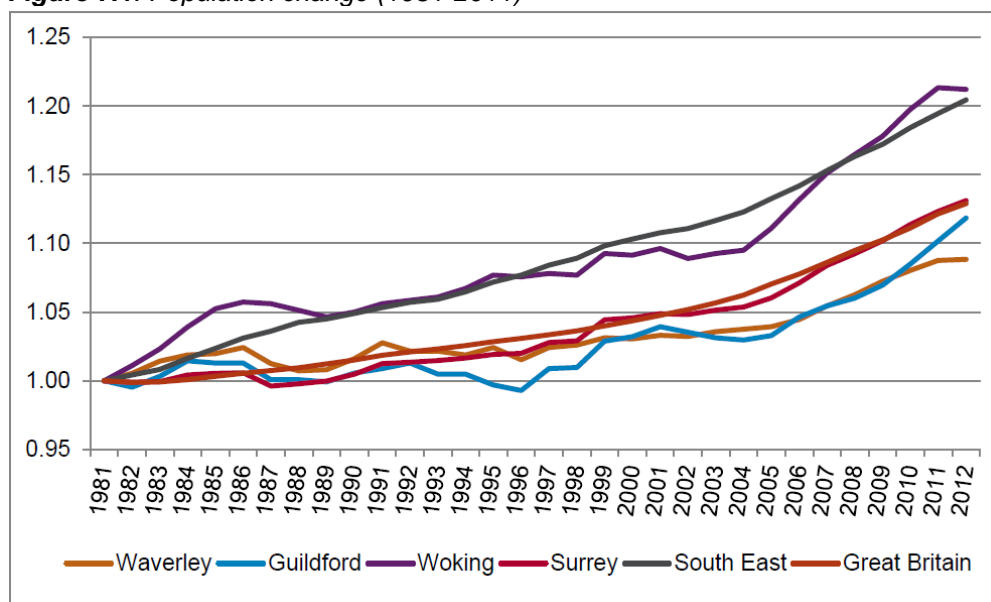
### 7.3 Climate change mitigation

- Carbon dioxide emissions per capita in Waverley are lower than those for Surrey and for England as a whole.
- Most emissions (44%) come from the domestic sector, while 34% of emissions result from transport. Significant levels of emissions from the transport sector reflect the rural nature of the Borough. There is on average 1.46 cars per household, and the majority of residents commute to work by car.
- Opportunities exist for increasing the amount of heat and power generated locally from renewable and low carbon sources. There are particular opportunities around the use of biomass as a fuel, given the amount of ancient woodland locally in need of management.

## 7.4 Community & wellbeing

- From **Figure 7.1**, it can be seen that Waverley (and to some extent Guildford) has seen relatively low historic growth in population, particularly since the early 1990s.

**Figure 7.1: Population change (1981-2011)<sup>6</sup>**

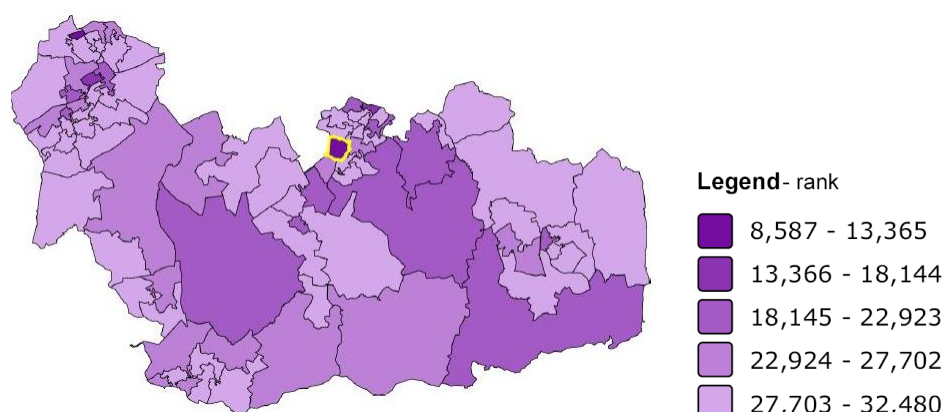


- There has been a marked decline in 20 to 35 year olds across Waverley over the past decade compared to comparator areas. This is some indication of the inability of households to form in this area due to issues with affordability.<sup>6</sup>
- Ethnic diversity in Waverley is limited, more so than wider Housing Market Area (particularly Woking) and the South East average.<sup>6</sup>
- Most people in Waverley enjoy good health, however: obesity among adults in Waverley is projected to increase significantly from 2015 to 2025, from 30,791 to 42,923; the population is ageing, with the population of Surrey aged 65+ expected to increase from 16.5% (2008) to 21.2% (2028); and there are some localised deficiencies in terms of healthcare provision. Access to services in rural areas can be dependent on infrequent bus services or private car.
- The Borough suffers from localised poor air quality due to traffic congestion, with AQMA designated at Farnham, Godalming and Hindhead.
- Whilst generally affluent, there are pockets of relative deprivation. **Figures 7.2 and 7.3** show that the majority of 'Lower Super Output Areas' (LSOAs) are within the least deprived 20% of LSOAs nationally. The most affluent LSOA ranks 32,480 out of 34,753 LSOAs nationally (where 1 = most deprived). Four LSOAs are within the 20-40% bracket, and hence are shaded darker purple within the Figures 7.2 and 7.3. The most deprived LSOA ranks 8,587 nationally. It is notable (see Figure 7.3) that three LSOAs – located to the north and south of Godalming, and to the north of Farnham – perform significantly worse than others (i.e. are relatively deprived).

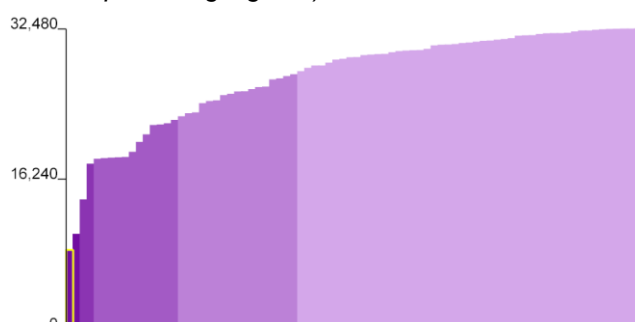
<sup>6</sup> Waverley & West Surrey Strategic Housing Market Assessment (GL Hearn, October 2013)



**Figure 7.2:** Map showing Index of Multiple Deprivation by Lower Super Output Area (with most deprived highlighted)<sup>7</sup>



**Figure 7.2:** Bar chart showing Index of Multiple Deprivation by Lower Super Output Area (with most deprived highlighted)<sup>7</sup>



## 7.5

### Economy

N.B. The majority of the following text is taken from the *Waverley & West Surrey Strategic Housing Market Assessment* (GL Hearn, October 2013).

- Skills levels in Waverley are even higher than the county levels. More than 40% of the population in the Borough has Level 4 qualifications or above whilst the proportion of residents with low or no qualifications (Level 1 or no qualifications) is around 25% compared with 28% across the wider county.
- Jobs density indicates the number of jobs per working age population within a particular area. Jobs density in Waverley is below the Surrey average, reflecting the great influence of London and to a lesser extent nearby Guildford on the Borough's labour market.
- It is useful to compare the incomes of full-time employed Waverley residents with those of people working in jobs located in the Borough. At around £26,200 the median income of Waverley "workers" is around £10,500 lower than the median income of Waverley "residents". This gap is around double that seen in Guildford and Woking and more than three times the gap seen in Surrey. This dynamic is a direct by-product of the outward commuting of the Borough's highly skilled residents to high level occupations (and incomes).
- Waverley recorded 58,730 workforce jobs in 2012, representing an increase of 9.6% from its 1997 level of 53,540. However, historic jobs growth in Waverley has been outpaced by growth across Surrey (14%) and the South East more generally (13%). Growth in Waverley has also lagged quite markedly behind that of the other areas within the Housing Market Area, with Guildford achieving 21% and Woking 19% over the same period.

<sup>7</sup> Index of Multiple Deprivation Dataset, available at: [www.neighbourhood.statistics.gov.uk](http://www.neighbourhood.statistics.gov.uk)

- Assuming no 'step change' in the Waverley economy (driven by planning and policy), projections indicate future employment growth in Waverley will continue to perform slightly behind the rest of Surrey but above the South East average. This appears realistic; however, the average annual growth of 1.04% per annum in the period to 2031 is slightly optimistic when compared to historic growth in the pre-recession decade (i.e. 1997 to 2007).
- A third of Waverley's jobs are to be found in Farnham. Godalming is the second largest employment hub, although of the town's economically active population only 24% both live and work in the town. Outside Farnham and Godalming employment is spread across the Borough with Haslemere providing about 3% of jobs.
- Tourism is an important contributor to the local economy, given the AONB. It is estimated that there are 2.33m day trips to Waverley every year, contributing £54m to the economy. Also, Haslemere provides an important gateway to the South Downs National Park.
- A recent report by Enterprise M3 – the Local Enterprise Partnership – see **Figure 7.4** – identifies the need to “*identify strategic sites for development of sustainable new communities in the longer term, to ensure an adequate pipeline of new housing provision in the Enterprise M3 into the longer term. This should focus on the Step Up Towns (Camberley, Aldershot, Andover, Whitehill and Bordon and Staines upon Thames) and Growth Towns (Basingstoke, Farnborough, Guildford and Woking) identified in the Strategic Economic Plan.*” Towns in Waverley are not referenced in the report (which is currently in draft form), indicating that the role for Waverley is more around meeting the needs of *local* business by ensuring that there is a flexible and good quality supply of suitable land and premises, particularly for small and medium size businesses, and also through providing housing needed for workers in the sub-region.<sup>8</sup>

**Figure 7.4:** The Enterprise M3 LEP area

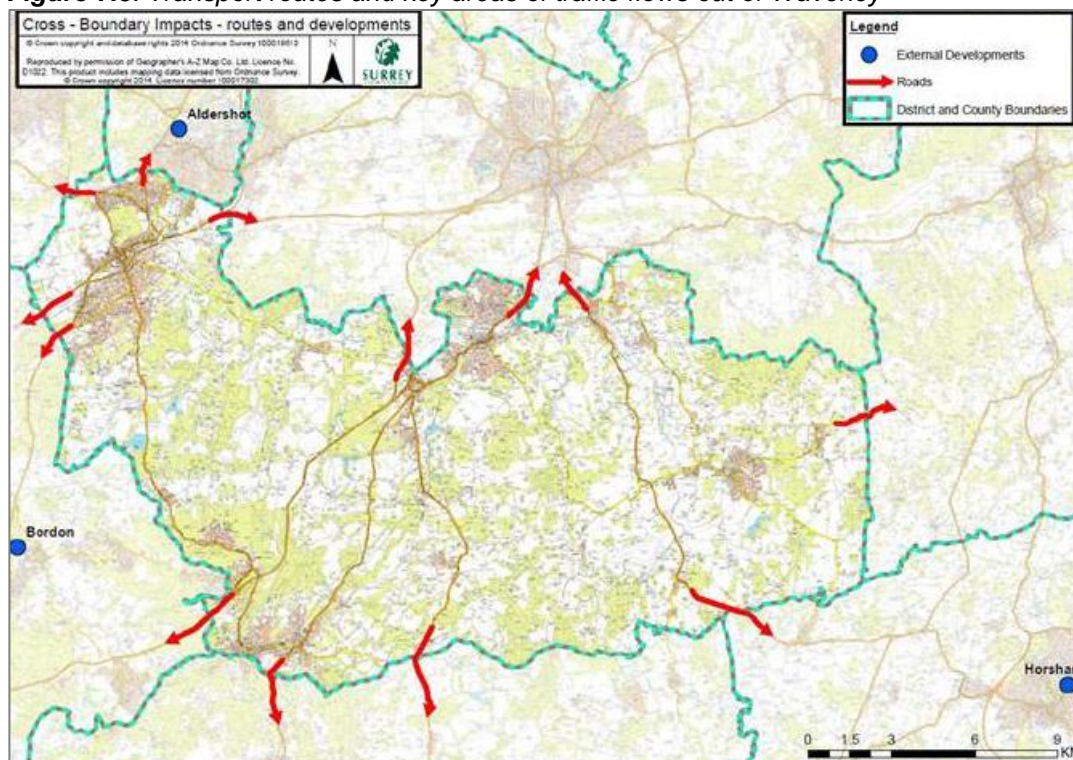


<sup>8</sup> Regeneris Consulting (2014) *Enterprise M3 Housing Evidence Study* [Draft version, August 2014]

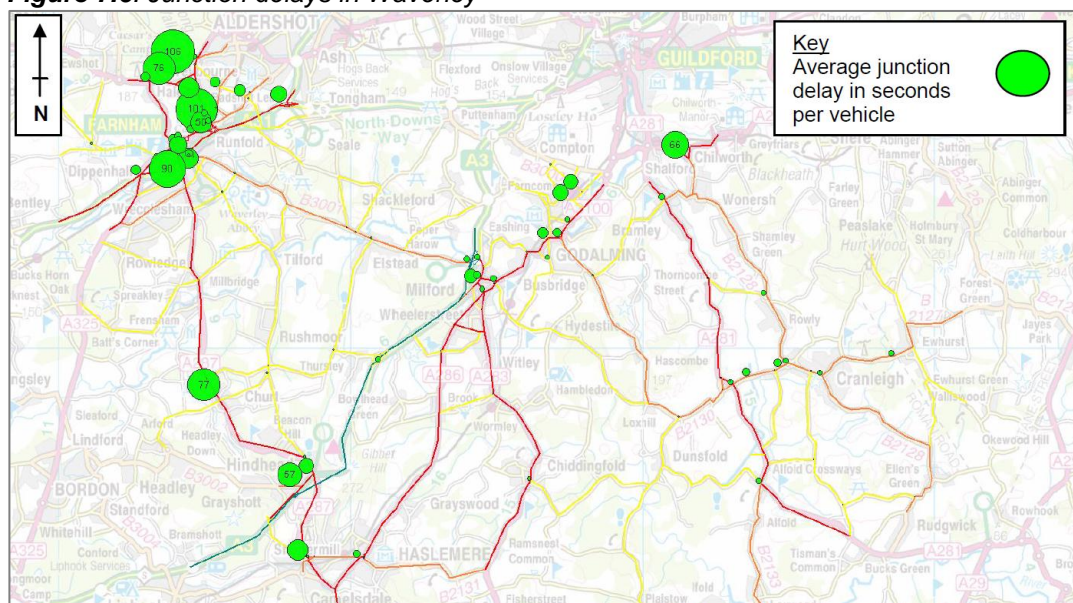


- The road network is fundamental to the economy of Waverley and the wider sub-region. **Figure 7.5** shows key transport routes, with arrows highlighting the key areas where traffic flows from Waverley to neighbouring authorities. **Figure 7.6** shows average junction delay (for the weekday average AM peak hour) under a 2031 'do minimum' scenario, i.e. a scenario that assumes minimal growth in Waverley, but assumes that planned growth in neighbouring authorities will occur. It can be seen that congestion is an issue at Farnham.

**Figure 7.5: Transport routes and key areas of traffic flows out of Waverley<sup>9</sup>**



**Figure 7.6: Junction delays in Waverley<sup>9</sup>**



<sup>9</sup> Surrey County Council (June, 2014) *Waverley Borough Local Plan Strategic Transport Assessment Report*

## 7.6 Heritage & townscape

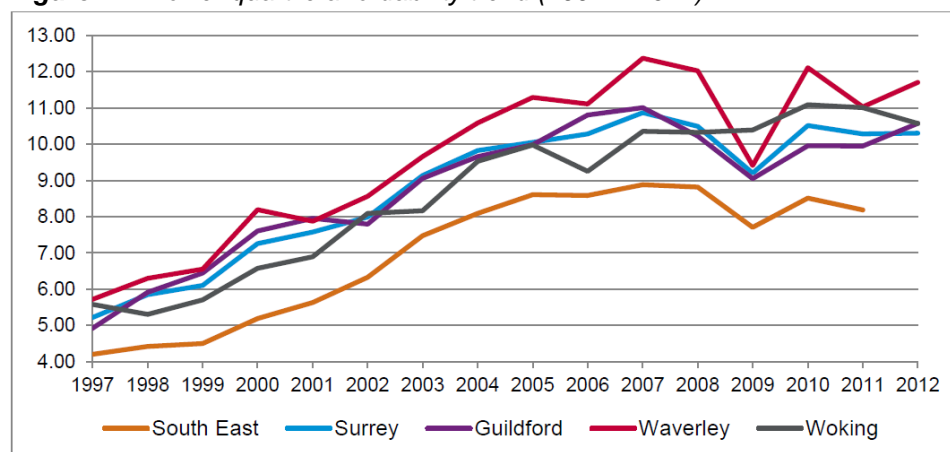
- Within the Borough there are 43 Conservation Areas, over 1,700 Listed Structures, 8 Historic Gardens, 23 Ancient Monuments (inc. Waverley Abbey) and 11 sites of archaeological importance.
- Focusing on Conservation Areas (CAs) associated with key towns and villages: at Farnham the CAs are in the town centre, in the south east part of the town and to the west in Wrecclesham; at Godalming the CAs are in the town centre, at the Lammas Lands, to the west of the centre and towards the northern and southern edges of the town: at Cranleigh the CA is mainly to the north of the village High Street and at Haslemere the CAs are in the town centre, and an area on the western side of the town. There are also CAs associated with many villages, including at Dunsfold and Alford (villages in close proximity to Dunsfold aerodrome) and Bramley (a village north of Dunsfold Aerodrome, along the A281).

## 7.7 Housing

N.B. The following text, tables and diagrams are taken from the *Waverley & West Surrey Strategic Housing Market Assessment* (GL Hearn, October 2013).

- Issues of affordability are notable across the HMA; however, they are particularly acute in Waverley both at **lower quartile and median incomes**. There is evidence that affordability is constraining and restricting household formation, particularly amongst the 20 to 35 age groups (i.e. first time buyers or smaller families). **Figure 7.7** shows that during the mid-2000s (in the heat of the market), Waverley's **lower quartile** affordability ratio rose at a sharper rate than comparator areas. Whilst this divergence lessened during the recession, it provides an indication that in a high demand market, Waverley experiences a comparatively more significant problem with affordability.

**Figure 7.7: Lower quartile affordability trend (1997 – 2012)**



### 7.7.1

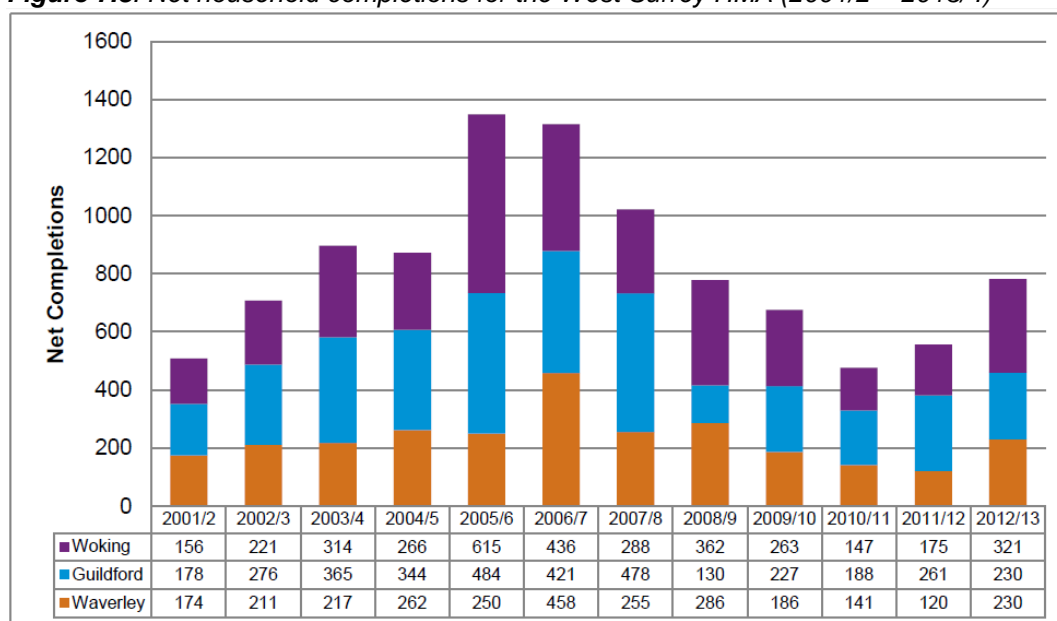
The **median income ratio** is even higher than the lower quartile ratio, indicating that affordability is an issue across the market in Waverley. As can be seen in **Table 7.1**, the opposite is true for comparator areas, i.e. affordability is an issue mainly for lower quartile income households.

**Table 7.1: Comparison of lower quartile and median affordability (2012)**

	Lower quartile ratio	Median ratio
Waverley	11.70	12.40
Guildford	10.57	9.84
Woking	10.57	9.91
Surrey	10.31	9.41
South East	8.19*	7.97

- 7.7.2 Data on house types suggests the Waverley market is strongly geared more towards established family type accommodation. The proportion of detached (42%) is significantly above the regional average (28%) and even the wider Housing Market Area (HMA) (36%). Whilst the proportion of semi-detached properties is broadly consistent with the regional and HMA average, when combined with detached properties these types represent almost 70% of the total stock. This potentially serves to indicate a comparative lack of suitable and accessible options for smaller (particularly newly forming) households in the Borough. An analysis of properties by number of bedrooms lends support to this conclusion.
- 7.7.3 Divergence between workplace base and residence based earnings in Waverley is highly significant, even by Surrey standards. The risk of those in local employment (and thus contributing to the local economy), lower income workers and first time buyers being marginalised from the housing market is therefore particularly acute in Waverley. This is somewhat borne out in the marked decline in the 20-35 age bracket seen in the Borough over the past decade. It is also worth noting that continued growth in higher value jobs in the Borough could exacerbate issues of affordability, particularly for those in newly created “population driven” jobs.
- 7.7.4 77% of households in the Borough have an excess of space for the number of residents, more than half of which fall within the highest category of under-occupation. Whilst high levels of under-occupation are apparent across the HMA, it is clearly more prevalent in Waverley. The “phenomenon” of under-occupation is particularly borne out of ageing demographics and reasonable affluence which particularly drive “empty nester” households. In Waverley, this is arguably made more acute by the dominance of larger properties and the relative lack of downsizing options. Given the demographic and socio-economic profile of Waverley, this issue is likely to continue to rise in future, reducing liquidity in the market for larger properties in the area. Whilst the encouragement of downsizing is an inexact science (and driven as much by attitude as stock availability), there may be an argument for increasing the supply of smaller units in these areas but with the product focussed on the types (houses rather than flats) and quality of units which are attractive to older households.
- 7.7.5 With regards to housing supply, **Figure 7.8** shows that the correlation between housebuilding and market conditions within the West Surrey HMA is very strong which is perhaps indicative of the influence that macro-economic conditions have on an areas such as this.

**Figure 7.8:** Net household completions for the West Surrey HMA (2001/2 – 2013/4)





## 7.8 Landscape

- Approximately 92% of the Borough is rural, with 61% (21,000 hectares)<sup>10</sup> falling within the Metropolitan Green Belt. High-level conclusions of the Green Belt Review<sup>10</sup> are as follows:
  - Given the overall strength of the Green Belt function across the Borough, identification of areas where the adjustment of Green Belt boundaries could be considered for extensive areas of contiguous development is challenging.
  - There are instances where small scale development could be placed without significant damage to the Green Belt, particularly given the generally heavily wooded character of the Borough which can often limit visual intrusion; however, damage is likely to occur cumulatively and the function of the Green Belt undermined over the longer term. Establishing long term boundaries for the Green Belt through the subdivision of segments is challenging, particularly in the absence of clear boundaries such as roads to help contain development and set long term development limits.
- Other points made within the Green Belt Review are as follows:
  - The heavily wooded landscape character means that views are often restricted to the short and middle distance creating a strong sense of visual enclosure and rural character, even within the vicinity of relatively (for this Borough) urbanised areas.
  - Aside from the main settlements, a sense of urbanisation is most keenly felt in the vicinity of the road corridors (principally the A3, A286, A283, A281 and A287) where in some locations ribbon development has occurred.
  - Green Belt has clearly helped to protect the basic settlement pattern across the Borough, maintaining the separation between the principal settlements and the surrounding network of villages and hamlets.
  - A role of Green Belt is to protect the context of the Borough's historic towns (notably Godalming and Haslemere in respect of the A3100, A283, A286 and A287) by maintaining the unbuilt character of key gateways.
- 80% of the countryside is designated as an Area of Outstanding Natural Beauty (AONB) and / or an Area of Great Landscape Value (AGLV)
  - The AONB presents a particular challenge in Haslemere, whilst in Farnham, Godalming and Cranleigh the AONB is less of a constraint. The AONB is to the south-eastern edge of Farnham, and exerts greatest influence in the routes out to the south/ south-east. At Godalming the AONB abuts the south eastern boundary of the town, whilst at Cranleigh, the AONB is 0.5 km to the north.
  - The Area of Great Landscape Value (AGLV) is a local (county-wide) landscape designation that overlaps with, and in some areas extends beyond, the AONB. This is particularly the case around the edge of Farnham and for land in the south-east corner of Waverley. The AGLV also abuts the south and west of Godalming, having the greatest influence on the southern fringe area of Holloway and the Busbridge area. As a local designation, the AGLV does not have as much weight as the AONB; however, it should be noted that Natural England is proposing to carry out a review of the boundary of the Surrey Hills AONB and this could result in some existing AGLV land being incorporated into the AONB.
- In addition to the AGLV, there are other local landscape designations affecting the countryside outside the settlement areas. It was recently recognised that the evidence-base underpinning these designations was limited, meaning that the weight that could be afforded to them was similarly limited. As such, a landscape study was commissioned, which identified that the majority of the land parcels falling within these designated areas *do* deserve a local designation. The areas of designated as locally important are:

<sup>10</sup> Draft Waverley Green Belt Review (Amec, 2014)



- Area of Strategic Visual Importance (ASVI) – this applies to some areas of around the main settlements. The purpose of the designation is to recognise the value of those areas of open countryside that penetrate into the urban area;
- Farnham/Aldershot Strategic Gap – this applies to the countryside that separates Farnham, Badshot Lea and Aldershot.
- Godalming Hillsides – this applies to land both within and on the edge of the settlement area of Godalming, including the wooded hillsides that enclose the town.
- Areas of Historic Landscape Value – this applies to Farnham Park (which is also a Historic Park and Garden) and Frensham Common.

## 7.9 Soils & other natural resources

- Although there are small pockets of Grade 2 agricultural land in the Borough, most is Grade 3 or 4. There is no land classified as Grade 1.
- The majority of identified contaminated sites are within the metropolitan centres. A large number of the identified sites are small to medium areas of previously in-filled land.
- The proportion of residential development on previously developed land has decreased over recent years, from 86% in 2003/04 to 58.5% in 2011/12; however, the decrease in part reflects the fact that the definition of PDL changed in June 2010. Under the new definition, private residential gardens are now excluded from land considered as within the curtilage of developed land.

## 7.10 Water, flood risk, and other climate change adaptation issues

- The EA has identified Waverley as falling within a wider area of “serious” water stress. In 2008 / 2009 average water consumption in Waverley was 160-170 litres per person per day; compared to national average of 150 litres. The situation is set to improve in the future, however, due to measures including increased use of meters.
- The primary risk of flooding in the Borough is river flooding from the River Wey and its tributaries. Areas within the Borough that are known to have flooding problems include Bramley, Chiddingfold, Cranleigh, Dunsfold, Farnham, Godalming and Haslemere. Area’s susceptible to flooding from surface water and highway drainage, including known locations in Waverley (e.g. Fishers’ Rowe Close in Bramley) are identified on Surrey CC’s ‘wet-spot’ database.

## 8 WHAT ARE THE KEY ISSUES AND OBJECTIVES THAT SHOULD BE A FOCUS?

### 8.1 Introduction

- 8.1.1 Drawing on the review of the sustainability context / baseline, this chapter presents a list of key sustainability issues and objectives that should be a particular focus of SA, i.e. should be used as a methodological framework for the appraisal of likely effects on the baseline.

### 8.2 The SA Framework

Sustainability issues	Sustainability objectives
<b>Biodiversity</b>	
<ul style="list-style-type: none"> <li>Large areas of the county are covered by biodiversity designations, including internationally important SACs and SPAs; these need to be protected and where possible enhanced.</li> <li>Outside of designated sites are areas of woodland, rivers and streams and other habitats that act as important stepping stones and corridors that contribute to connectivity at the landscape scale.</li> <li>Climate change will place pressures on biodiversity, and hence there is a need to plan positively for ecological networks.</li> </ul>	<ul style="list-style-type: none"> <li>Protect and enhance biodiversity, including through a focus on ensuring the continued health and functioning of designated protected sites and strategic ecological corridors with respect to priority species found in the Borough.</li> </ul>
<b>Climate change mitigation</b>	
<ul style="list-style-type: none"> <li>Significant carbon dioxide emissions from the built environment, particularly from housing</li> <li>Significant carbon dioxide emissions from dependence on car use</li> <li>Government policy encourages sustainable construction, energy conservation and renewable energy generation.</li> </ul>	<ul style="list-style-type: none"> <li>Reduce per capita carbon dioxide emissions <ul style="list-style-type: none"> <li>Support the increased capacity of renewable energy and/or low-carbon district heating networks</li> <li>Reduce the reliance on journeys by car, including through encouraging and supporting trips made by walking, cycling and public transport.</li> </ul> </li> </ul>
<b>Community and well-being</b>	
<ul style="list-style-type: none"> <li>Although the Borough is generally affluent, relative deprivation is experienced by sectors of the population and some communities.</li> <li>An ageing population will increase demands on health and social care resources.</li> <li>Cars are the most widely used form of transport. Heavy traffic on the roads results in localised congestion and air pollution; and relatively high levels of road injuries and deaths.</li> <li>Childhood obesity, although lower than the national average, remains a concern.</li> </ul>	<ul style="list-style-type: none"> <li>Reduce poverty and social exclusion</li> <li>Encourage healthy lifestyles, reduce inequalities in health and plan to meet emerging strategic health issues, not least those relating to the ageing population.</li> <li>Improve accessibility to services, facilities and amenities, including for residents of rural areas.</li> <li>Ensure access to education and skills development opportunities</li> </ul>
<b>Economy</b>	
<ul style="list-style-type: none"> <li>There is a high prevalence of out-commuting.</li> <li>The high cost of living prevents key and low paid workers from living in the Borough.</li> </ul>	<ul style="list-style-type: none"> <li>Support sustained economic growth to meet employment needs, including in rural areas</li> <li>Enhance the vitality of the Borough's centres</li> <li>Improve the match of skills to vacancies</li> </ul>

<ul style="list-style-type: none"> <li>• Congested roads and other infrastructure constraints may limit economic growth.</li> <li>• Tourism needs to be properly managed to ensure that increased visitors numbers and associated traffic use do not undermine this sector's growth and its contribution to the local economy.</li> </ul>	<ul style="list-style-type: none"> <li>• Retain well located commercial land</li> <li>• Encourage the development of a sustainable tourism sector, based on Waverley's natural and cultural assets</li> <li>• Secure investment in key infrastructure</li> </ul>
<b>Heritage and townscape</b>	
<ul style="list-style-type: none"> <li>• Townscape and cultural heritage is of central importance to local distinctiveness.</li> <li>• The Borough contains 43 Conservation Areas, over 1,700 Listed Structures, 8 Historic Gardens, 23 Ancient Monuments and 11 sites of archaeological importance.</li> </ul>	<ul style="list-style-type: none"> <li>• Conserve and enhance the historic environment, with a focus on designated assets and their settings</li> <li>• Maintain and enhance townscape including through a reduction in derelict or degraded land and a focus on high quality urban fringes.</li> </ul>
<b>Housing</b>	
<ul style="list-style-type: none"> <li>• High house prices create affordability problems, particularly for first time buyers and key workers.</li> <li>• The need for accommodation for people with care and support needs is likely to increase, given the significant projected growth in the over 65 population over the plan period.</li> <li>• Other groups with specialist accommodation needs include Gypsies and Travellers.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure everyone has the opportunity to live in a decent home</li> <li>• Increase the supply of affordable housing</li> <li>• Support provision of housing for those with specialist needs, including older people</li> </ul>
<b>Landscape</b>	
<ul style="list-style-type: none"> <li>• Much of the Borough is protected by an environmental designation with 61% Green Belt and 80% AONB / AGLV.</li> <li>• The existing protection already afforded to the natural environment within the Borough is likely to help preserve the landscape character; however, there is also likely to be potential for the 'erosion' of existing and valued character qualities due to development pressure.</li> </ul>	<ul style="list-style-type: none"> <li>• Conserve and enhance distinctive landscapes with particular consideration given to the nationally important AONBs and landscapes designated as being of more local importance.</li> <li>• The plan should consider the potential to avoid harm and seek enhancements to local landscapes (through Landscape Character Assessment and Landscape &amp; Visual Impact Assessment, where appropriate).</li> </ul>
<b>Soils and other natural resources</b>	
<ul style="list-style-type: none"> <li>• Residential development on PDL has decreased in recent years. It is likely that the proportion of development occurring on PDL will not increase without targeted intervention.</li> <li>• Contamination issues may arise on PDL.</li> </ul>	<ul style="list-style-type: none"> <li>• Make most efficient use of land, including through maximising use of PDL (including contaminated sites where remediation is possible).</li> </ul>
<b>Water, flood risk and other climate change adaptation issues</b>	
<ul style="list-style-type: none"> <li>• Waverley, like the rest of the South East of England, is expected to experience more extreme weather events, including droughts, heat-waves, storms and floods arising from torrential rain.</li> <li>• Water stress in the South East is likely to worsen as a result of climate change and increased demand relating to population growth.</li> </ul>	<ul style="list-style-type: none"> <li>• Encourage reduced per capita consumption of water and increased water efficiency.</li> <li>• Minimise the impact of development on flooding (fluvial, surface and groundwater) and avoid development in at risk areas.</li> <li>• Climate proof' urban areas (e.g. through shading and shelter in public spaces) and infrastructure</li> <li>• Prevent pollution to the water environment.</li> </ul>

## **PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?**

## 9 INTRODUCTION (TO PART 2)

- 9.1.1 The aim of this Part of the Report is to explain plan-making / SA work that has been undertaken up to this point, i.e. in the build-up to preparing the 'Potential housing scenarios and other issues for the Waverley Local Plan' consultation document.
- 9.1.2 Some information is presented for more or less background purposes, whilst other information is presented because issues remain 'on the table' at the current time. Part 3 of this Report, rather than this Part, is where readers will find information that is most relevant to the current consultation (i.e. readers will find an appraisal of the housing scenario alternatives presented within the consultation document); however, readers are also welcome to comment on the information presented within this Part of the Report.
- 9.1.3 Part 2 of this SA Report is structured as follows –
- Chapter 10 - Provides an overview of plan-making / SA work undertaken **between 2007 and 2013** in relation to the Waverley Core Strategy.
- This information is presented for more than simply 'background' purposes. Although the Core Strategy was withdrawn in 2013, preparation of the Local Plan is to a large extent about building upon the foundations laid through work on the Core Strategy.
- Chapter 11 - Explains the plan-making / SA work undertaken in **early 2014** in order to *develop alternative housing scenarios*, i.e. the alternatives that are a focus of consultation and appraisal (see Part 3) at the current time.
- The need to determine a broad strategy for housing growth is the key issue for the Local Plan, and so it is appropriate that detailed, systematic process was followed when developing alternatives.
  - Other plan issues that are a focus of consultation and appraisal at the current time – which relate to Green Belt, Gypsies and Travellers, areas of local landscape importance and planning for employment land – are not considered within this Part of the Report. The process of preparing the alternatives / options that are a focus of consultation and appraisal at the current time was less involved, and was not directly informed by SA.

## 10 OVERVIEW OF PLAN-MAKING / SA WORK UNDERTAKEN BETWEEN 2007 AND 2012

### 10.1 Introduction

- 10.1.1 The aim of this chapter is to recap on how SA and consultation, undertaken between 2007 and 2013, has fed-into plan-making and influenced the current situation, i.e. a situation whereby the Council is consulting on alternative housing scenarios as well as alternatives / options for a range of other plan issues.

### 10.2 Overview

- 10.2.1 Work to develop a Core Strategy began in 2007, with the first consultation held in 2009. Several further consultations were then held, before the Core Strategy was submitted to Government in 2013. The full list of consultations held is as follows:

- February 2009: Consultation on issues and options for the Core Strategy
- January 2010: Consultation on options for the location of new homes
- September 2010: Consultation on options for the number of new homes
- January 2011: Consultation on Core Strategy Preferred Options and Draft Policies
- February 2012: Consultation on Core Strategy *Revised* Preferred Options and Draft policies
- August 2012: Consultation on the Core Strategy: Pre-submission version.

- 10.2.2 Subsequent to submission, and the publication of the initial conclusions of the Government appointed Planning Inspector, the decision was taken to withdraw the Core Strategy (October 2013). The Council subsequently resolved to begin work on a Local Plan.

- 10.2.3 The decision to withdraw the Core Strategy was undertaken largely on the basis of an identified need to rethink the **spatial strategy**, i.e. the preferred approach to 'how much' and 'where' in relation to housing growth. A small number of other plan issues are also the focus of plan-making at the current, including **Gypsies and Traveller** accommodation needs. For **other plan issues**, it is fair to assume that the policies presented within the submitted Core Strategy, remain broadly sound at the current time, i.e. is justified on the basis of extensive consultation and appraisal. Having said this, there is clearly a need to maintain a 'watching brief' with regards to all policies.

### 10.3 Issues and options for the Core Strategy (Feb 2009)

- 10.3.1 Issues covered / questions posed by the consultation documents included:

- How many new homes should be planned for?
  - Where should new homes be built?
  - What should the site size threshold be for requiring a proportion of affordable housing, and what amount of affordable housing should be required on development sites?
  - Should the Council extend the rural exceptions policy to all villages, and should the Council try to identify and allocate rural exception sites?
  - Meeting the housing needs of particular groups (including Gypsies and travellers)
  - Protecting existing employment land / providing additional employment land
  - Using the AGLV and Strategic Gap designations to protect landscape
  - Housing density
  - Sustainable design and construction
- ... and many more besides.



10.3.2 An Interim SA Report was prepared alongside the consultation document, which considered the merits of the various options presented for each of the policy issues. There is no need to recap the conclusions of the Interim SA Report here, but the document is available to view on the Council's website.<sup>11</sup>

#### 10.4 Options for the location of new homes (Jan 2010)

10.4.1 The consultation document began with the statement: *"We are required by the South East Plan to provide for at least 5,000 new homes in Waverley in the period from 2006 to 2026. The challenge for us is deciding where these new homes should go and this is where we would like your help."* The document then went on to present advantages/disadvantages of five options:

- 1) Development within the main settlements of Farnham, (including Badshot Lea), Godalming, Haslemere and Cranleigh **with any shortfall being met by selected releases of land around these settlements**
- 2) Development within the main settlements of Farnham, (including Badshot Lea), Godalming, Haslemere and Cranleigh **with with any shortfall being met by selected releases of land around these settlements and within and potentially around Beacon Hill and Hindhead and the five largest villages of Bramley, Chiddingfold, Elstead, Milford and Witley**
- 3) Development within the main settlements of Farnham, (including Badshot Lea), Godalming, Haslemere and Cranleigh **with any shortfall being met by selected releases of land around these settlements and within and potentially around the villages generally**
- 4) Development within the main settlements of Farnham, (including Badshot Lea), Godalming, Haslemere and Cranleigh **with any shortfall being met by a single urban extension to one of the main settlements**
- 5) Development within the main settlements of Farnham, (including Badshot Lea), Godalming, Haslemere and Cranleigh **with any shortfall being met by a new freestanding settlement**

10.4.2 No Interim SA Report was published alongside the consultation document, but the SA framework was taken into account when preparing the discussion of advantages/disadvantages for each of the options. The consultation document is available on the Council's website.<sup>12</sup>

#### 10.5 Options for the number of new homes (Sept 2010)

10.5.1 The consultation document began with the statement: *"We need your views to decide on the number of new homes that it would be acceptable to build in Waverley in the coming years... The Coalition Government has removed nationally and regionally imposed home building targets. Instead local councils like Waverley are now allowed to work with their communities to further understand how many homes should be built in their area."* The document then went on to present the 'advantages and disadvantages' of three options:

<sup>11</sup> See [http://www.waverley.gov.uk/site/scripts/download\\_info.php?downloadID=574](http://www.waverley.gov.uk/site/scripts/download_info.php?downloadID=574)

<sup>12</sup> See [http://www.waverley.gov.uk/downloads/file/1605/housing\\_options\\_technical\\_background\\_document](http://www.waverley.gov.uk/downloads/file/1605/housing_options_technical_background_document).

- 1) A number based on the South East Plan: This is what we were working towards
- 2) A number based on an estimate of land available to build homes on: This is likely to mean **fewer** homes being built than if we continued with option 1
- 3) A number based on the need and demand for homes in Waverley: This is likely to mean **more** homes being built than in option 1

10.5.2 The consultation document presented a range of background information, including on:

- Population Projections/household formation
- Evidence of local housing need, including as established through the Strategic Housing Market Assessment (SHMA)
- Affordability and house prices
- The Government's overall ambitions for affordability across the housing market, including the need to improve affordability and increase housing supply
- Economic Factors
- Evidence of the availability of suitable land including as established through the Strategic Housing Land Availability Assessment (SHLAA)
- Estimates of supply from windfall sites
- Implications of Government policy changes around garden land and housing density
- Environmental designations
- Infrastructure capacity
- Aspirations of adjoining authorities

10.5.3 The consultation document is available on the council's website.<sup>13</sup>

## 10.6 Core Strategy Preferred Options and Draft Policies (Jan 2011)

10.6.1 The consultation document was badged 'a draft strategy', and included: a vision for Waverley in 2027; a number of key objectives; and 19 proposed policies. A helpful synopsis of the consultation document is available on the Council's website.<sup>14</sup>

10.6.2 The preferred spatial strategy at the time was as follows: *"Waverley's plan includes a proposal for at least 2,591 new homes in the Borough between now and 2027. This figure is based on a current assessment of suitable and available land within the settlement areas and other suitable brownfield land. The figure also includes some allowance for the future delivery of new homes based on past trends. Waverley's proposed home building figures are a reduction from the previous Government's top-down target."*

10.6.3 Draft policies were also presented under the following headings: Sustainable transport; Infrastructure and community facilities; Affordable housing on development sites; Rural exception sites; Housing type and size; Gypsies, Travellers and Travelling Showpeople; Sustainable employment development; Town centres; Local centres; Neighbourhood and village shops; Leisure, recreation and cultural facilities; Landscape character; Townscape and urban design and heritage; Biodiversity and geological conservation; Thames Basin Heaths Special Protection Area (SPA); Sustainable design and construction; Renewable energy development.

<sup>13</sup> See [http://www.waverley.gov.uk/downloads/file/1999/technical\\_paper\\_setting\\_a\\_local\\_housing\\_target](http://www.waverley.gov.uk/downloads/file/1999/technical_paper_setting_a_local_housing_target)

<sup>14</sup> See [http://www.waverley.gov.uk/downloads/file/2178/waverley\\_in\\_2027-consultation\\_jan-mar\\_2011\\_leaflet](http://www.waverley.gov.uk/downloads/file/2178/waverley_in_2027-consultation_jan-mar_2011_leaflet)

10.6.4 An Interim SA Report document was published alongside the consultation. The Report presented an appraisal of alternatives for 'how much' and 'where', as well as an appraisal of the draft strategy / policies, as presented within the consultation document.<sup>15</sup>

## 10.7 Core Strategy Revised Preferred Options and Draft policies (Feb 2012)

10.7.1 The summary leaflet published alongside the consultation document began with the statement: *"This is the second time that we have consulted on our proposed Core Strategy. We have taken account of the views we received in response to the last consultation, held in January 2011, and we have now reviewed the Core Strategy. We have also had to take account of new national planning policy. The Government wants the supply of new houses to increase and Waverley has had to respond to this by setting an increased new housing target of 230 per year. Waverley is committed to protecting the Borough's special environment, but we have had to make some changes to the Core Strategy that we believe are necessary to deliver more new homes. Waverley remains concerned that any new development must be matched by improvements in infrastructure."* Aside from the housing target, amendments made to the strategy / policies were as follows:<sup>16</sup>

- New sites for housing on the edge of Farnham, Godalming and Cranleigh to meet the housing target
- A revised policy to increase the supply of affordable housing in the villages
- A new policy to manage the risk of flooding
- A new policy supporting employment growth at Dunsfold Aerodrome
- A revised policy to make sure developments are more efficient in using energy and water

10.7.2 An Interim SA Report document was published alongside the consultation document, which presented an appraisal of the preferred strategy / policies. This Interim SA Report was prepared by URS, and so it was the case that a 'new take' was taken on the merits of the preferred approach at this time. URS firstly appraised a 'working draft' of the preferred approach and fed-back findings so that these could be taken on-board by the Council when finalising the consultation document (see Appendix 4 of the Interim SA Report for a discussion of the changes that were made in-light of the appraisal). URS then updated the appraisal for consultation, drawing a range of conclusions (see Chapter 5) including:<sup>17</sup>

- The Sustainable Transport policy is likely to offer significant benefits in the longer term as the policy is likely to encourage efficient patterns of movement.
- The Affordable Housing on Development Sites policy is likely to offer significant benefits, given the longer lead-in times for major developments
- The Amount and Location of Housing policy is likely to have a significant adverse effect in relation to risk of surface and groundwater flooding.
- The Biodiversity and Geological Conservation policy will likely offer significant benefits in the longer term.
- The Thames Basin Heaths Special Protection Area policy is concerned with the conservation of the ecological integrity of the SPA and will likely offer significant benefits in the long term.

<sup>15</sup> See [http://www.waverley.gov.uk/site/scripts/download\\_info.php?downloadID=574](http://www.waverley.gov.uk/site/scripts/download_info.php?downloadID=574)

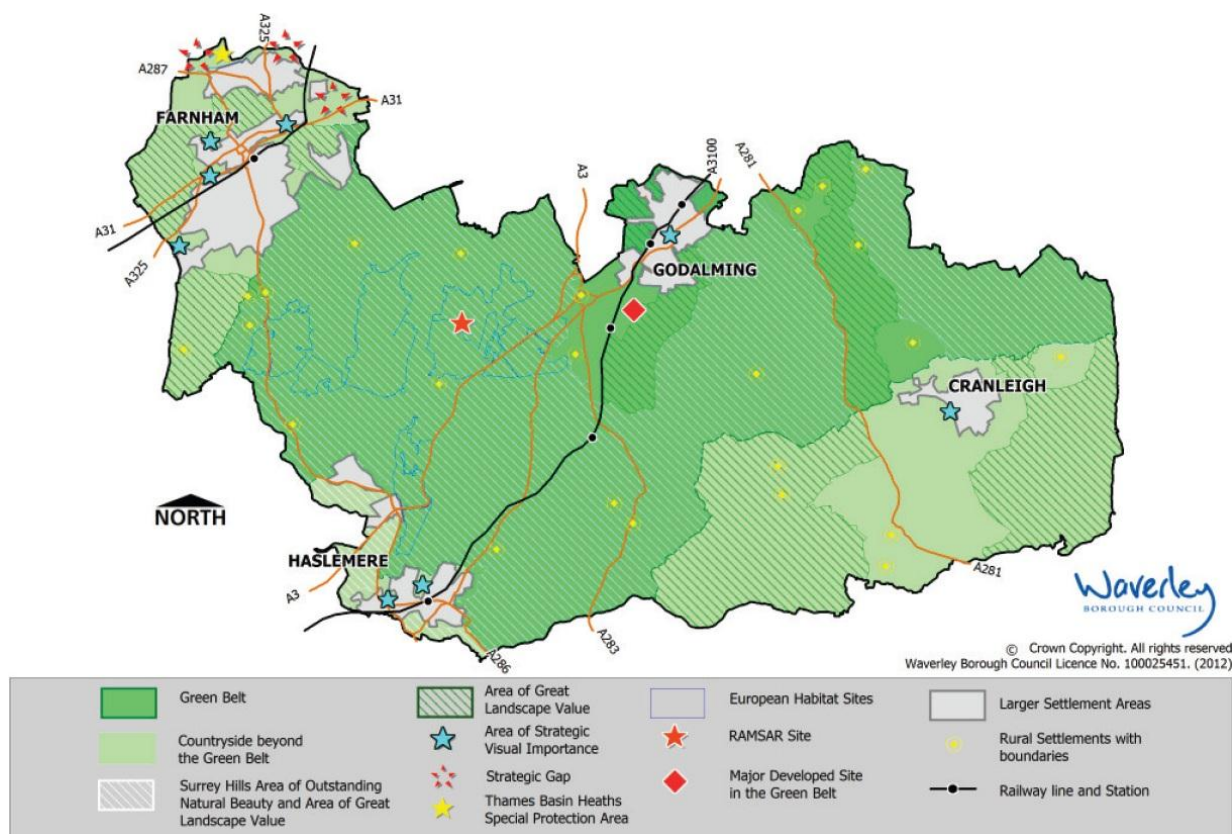
<sup>16</sup> See [http://www.waverley.gov.uk/downloads/file/2876/waverleys\\_future\\_building\\_consultation\\_leaflet](http://www.waverley.gov.uk/downloads/file/2876/waverleys_future_building_consultation_leaflet)

<sup>17</sup> See [http://www.waverley.gov.uk/site/scripts/download\\_info.php?downloadID=574](http://www.waverley.gov.uk/site/scripts/download_info.php?downloadID=574)

## 10.8 Core Strategy: Pre-submission version (Aug 2012)

- 10.8.1 Subsequent to the Feb 2012 consultation on Revised Preferred Options and Draft policies / the Interim SA Report the Council were in a position to prepare the 'Pre-submission' version of the Core Strategy, for publication in-line with Regulation 19 of the Local Planning Regulations. A Consultation Statement was published alongside in-order to explain the issues raised through past consultations, and how these had been addressed.<sup>18</sup>
- 10.8.2 The Core Strategy SA Report was published alongside the consultation document, in-line with the Regulations. Appraisal conclusions remained broadly the same as those presented within the February 2012 Interim SA Report, and can be seen in summary form in the Non-technical Summary published alongside the SA Report.<sup>19</sup>
- 10.8.3 In addition to presenting an appraisal of the preferred strategy / policies, the SA Report documented the full 'story' of plan-making / SA up to that point, with a focus on explaining how detailed consideration of alternatives had fed-into plan-making.<sup>20</sup>

**Figure 10.1: Overview of the preferred spatial strategy as it stood in August 2012**



<sup>18</sup> See [http://www.waverley.gov.uk/downloads/file/3213/core\\_strategy\\_consultation\\_statement\\_august\\_2012](http://www.waverley.gov.uk/downloads/file/3213/core_strategy_consultation_statement_august_2012)

<sup>19</sup> See [http://www.waverley.gov.uk/site/scripts/download\\_info.php?downloadID=574](http://www.waverley.gov.uk/site/scripts/download_info.php?downloadID=574)

<sup>20</sup> *Ibid.*

## 11 DEVELOPING ALTERNATIVE HOUSING SCENARIOS

### 11.1 Introduction

- 11.1.1 The need to develop a broad housing growth strategy for the Borough was identified in 2013 as the key issue to be addressed as part of Local Plan-making. As such, it was recognised that this issue should be addressed via appraisal of 'reasonable alternatives'.
- 11.1.2 This Chapter explains how the Council arrived at the alternative scenarios that are a focus of consultation and appraisal at the current time. In other words, the aim of this chapter is to demonstrate the 'reasonableness' of the alternatives. This information is provided in-light of the requirement to explain 'outline reasons for selecting the alternatives dealt with'.<sup>21</sup>
- 11.1.3 The information presented in this Chapter seeks to complement and supplement the information presented within the Consultation Document, which explains the thinking behind the alternative housing scenarios by first explaining the outcomes of the recent Strategic Housing Market Assessment (SHMA) and then considering capacity (for delivering housing) under the following headings: Capacity within settlements; Capacity on the edge of the main settlements; Villages; Rural brownfield land; and Dunsfold Aerodrome.
- 11.1.4 Specifically, this chapter explains how alternative housing scenarios were developed following:
- 1) Informal consideration of **alternative Borough-wide growth quantum**s
  - 2) Informal consideration of **strategic alternatives for each settlement**
  - 3) Detailed consideration (SA) of **site options**
  - 4) Detailed consideration (SA) of **initial alternative housing scenarios**
- 11.1.5 This work was undertaken in **spring 2014**. It is worth noting that the sequence of events was slightly complicated by the fact that (3) was a task that needed to be revisited numerous times as new information became available. Indeed, it remains the case that site options appraisal findings must be revisited in-light of new evidence as it emerges.

### 11.2 Informal consideration of alternative Borough-wide growth quantum

- 11.2.1 A key strategic priority for the Borough is the need to address objectively assessed housing need, which according to the draft Waverley and West Surrey Strategic Housing Market Assessment (October 2013) means delivering 470 dwellings per annum (i.e. 8,450 dwellings over the plan period, 2013-31). As such, it was identified that delivering **470dpa** is an option with clear merit that should feed into the development of alternative housing scenarios.
- 11.2.2 However, the need to address objectively assessed housing need is not the only strategic consideration. Another priority is to protect local environmental resources, including internationally important wildlife sites. In-light of this objective the conclusion was reached (in spring 2014) that delivering **fewer than 470dpa** was also an option. [N.B. Read further on – Section 11.6 – for an explanation of why this is no longer thought to be the case.]
- 11.2.3 Whether or not delivering **in excess of 470dpa** is a 'reasonable option' that warrants detailed consideration was debated in spring 2014. Waverley is a heavily constrained Borough - with extensive areas of nationally and internationally designated habitat, extensive landscapes designated as being of national importance, extensive areas of ancient woodland and a dispersed settlement pattern with rural settlements poorly connected by public transport – and it is probably not the case that Waverley is less constrained than neighbouring authorities.<sup>22</sup>

<sup>21</sup> See Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations

<sup>22</sup> Under the Duty to Cooperate, it can be necessary for authorities to accept additional housing if it the case that neighbouring authorities are more constrained (e.g. in terms of environmental assets) and hence less able to deliver the housing needed to meet objectively assessed needs within the sub-regional housing market area.



- 11.2.4 It is also the case that there are no economic growth considerations that override the objective to plan in line with environmental constraints ('limits'), i.e. it is not the case that a higher growth strategy would stimulate employment to the extent that out commuting is significantly reduced.
- 11.2.5 However, on balance it was considered (in spring 2014) appropriate to consider the implications of a higher growth option, in case Waverley is to be asked to accommodate unmet needs from elsewhere. This was considered a pragmatic step, given that the SHMA was not yet complete, and hence there was much uncertainty as to whether there will be a housing shortfall across the housing market area.
- 11.3 Informal consideration of strategic alternatives for each settlement**
- 11.3.1 During early meetings between the plan-making team and the SA team discussion was given over to the high level / 'top down' considerations that might drive the determination of a preferred strategy for each of the main settlements (as well as the strategy for more rural settlements, and at Dunsfold Aerodrome). It is useful to consider 'top-down drivers of change', although in reality it is the case for Waverley that the preferred approach will be driven primarily by 'bottom-up' (i.e. site specific) considerations.
- 11.3.2 Within **Table 11.2** each of the four main settlements is classified as having the potential for no growth, low growth, medium growth, high growth or very high growth.<sup>23</sup> More specifically, the Table poses the question –  
*What scales of growth are 'reasonable options' that might be explored further, through development/appraisal of alternative housing scenarios?*
- 11.3.3 It is important to stress that Table 11.2 does not present the final word. As discussed above, it is 'bottom-up' considerations that drive planning in Waverley, and it may yet transpire that such considerations – e.g. around the delivery of Suitable Alternative Natural Greenspace (SANG) or the viability of infrastructure upgrades – come to light and disprove or override the top-down conclusions reached in Table 11.2.

<sup>23</sup> 'Low growth' = 5 – 10% increase in dwelling stock; 'medium growth' = 11 – 15%; 'high growth' = 15 – 25%; and 'very high' = 25% plus



**Table 11.1** Broad alternatives for each main settlement

	A reasonable option?					Commentary
	No growth	Low growth	Medium growth	High growth	V high growth	
Farnham	No		Yes		No	<p>Given established objectives around meeting housing needs and focusing growth at main settlements, no/low growth is not a reasonable option at Farnham.</p> <p>From a socio-economic perspective there is capacity for high growth, and growth could benefit existing residents. Affordable housing need is focused here, and growth could enable delivery of community infrastructure, support the town centre and attract employers.</p> <p>Biodiversity constraints rule out a very high growth approach, given proximity to the Thames Basin Heaths SPA; and whilst it is appropriate to test a high growth option, the potential to achieve this is entirely dependent on the ability to deliver sufficient (SANGs).</p>
Godalming	No		Yes		No	<p>As with Farnham, no/low growth at Godalming is not an option, and there are potentially socio-economic benefits that could result from a high growth approach.</p> <p>However, the Green Belt Review has recently concluded that the Green Belt around the town does largely serve an important purpose, and hence there is very limited scope for growth, i.e. high growth is not a reasonable option. Parts of Godalming are also heavily constrained by the AONB.</p>
Haslemere	No		Yes		No	<p>Haslemere is heavily constrained by the AONB and National Park, and hence the question is whether the scale of growth (i.e. increase in dwelling stock) should be in the region of 9/10% (classified here as 'low' growth), or 11% (classified here as 'medium' growth).</p>
Cranleigh	No			Yes		<p>Cranleigh is <i>relatively</i> unconstrained environmentally, and so it is appropriate to consider 'very high' growth as an option. <u>However</u>, it is recognised that there no major socio-economic arguments in favour of this option. Cranleigh has more of a 'village feel' than is the case for the other main settlements, and it is the case that housing need is not focused in this part of the Borough. Also, recent speculative (i.e. non-plan led) applications for housing schemes have served to highlight concerns over infrastructure.</p>

	A reasonable option?					Commentary
	No growth	Low growth	Medium growth	High growth	V high growth	
Larger villages	No		Yes		No	<p>Affordability of housing in villages is an issue across the region, and hence 'no growth' is not a reasonable option.</p> <p>At larger villages - i.e. those with some shops and services - medium growth could, in some instances, support the vitality of village centres that might otherwise struggle in the future.</p> <p>Given heritage/landscape constraints, and the fact that car dependency will always be prevalent, a high growth approach is an unreasonable option for most villages.</p> <p>However, there may be arguments in favour of high growth at Milford and Witley, subject to further work on infrastructure and services. Both villages have a train station and are less constrained by landscape / Green Belt considerations.</p>
Small villages	No	Yes		No		Small villages with no services are appropriate for low growth only, given entrenched car dependency.
Dunsfold Aerodrome	Yes	No	Yes		No	<p>The site has been promoted for several years, and work has been undertaken to establish how opportunities could be realised / constraints addressed. However, 'no growth' at Dunsfold Aerodrome remains an option.</p> <p>If growth were to occur at the site, it would need to be of a scale that enables the funding of certain infrastructure upgrades, and hence a 'low growth' approach is not an option.</p> <p>Promoters are actively considering three levels of growth: 1,800 dwellings, 2,600 dwellings and 3,400 dwellings.</p> <p>A very high growth option has also been suggested, but promoters have not provided evidence to justify this as a reasonable option.</p>

## 11.4 Detailed SA of site options

### Introduction

11.4.1 Site options appraisal was the main focus of plan-making / SA work in early 2014, i.e. in the build-up to preparing the alternative housing scenarios that are the focus of consultation at the current time. Appraisal findings were revisited on numerous occasions as new information came to light, and indeed continue to be revisited.

11.4.2 Site options were appraised as part of a Strategic Housing Land Assessment (SHLAA) study led by the Council. URS worked with the Council to develop parts of the SHLAA methodology to ensure that sustainability considerations (i.e. issues and objectives identified through SA scoping) were fully reflected.

### Identifying a 'long list' of sites

11.4.3 It was recognised at an early stage that there was a need for the SHLAA to focus on site options outside of settlement boundaries only (i.e. 'rural' sites). Potential housing sites within settlements are generally considered to be suitable in principle as they are broadly consistent with existing planning policy.

11.4.4 The long list included all rural sites that have been promoted as potential housing land, many having put forward through 'call for sites' exercises instigated by the Council (the most recent being in January 2014). The long list of site options also included sites where planning permission has been refused and land in public sector ownership. The long list comprises over **260 sites**.

### Sifting out 'unreasonable' site options / identifying a shortlist of reasonable site options

11.4.5 After a verification exercise (to remove duplicate sites and those now with planning permission), the Council undertook a desktop exercise in order to 'sieve-out' unreasonable site options and hence make subsequent assessment more manageable. Sites removed at this stage were those that were -

- Less than 0.2 in size, as these cannot make a meaningful contribution;
- Completely within one of the Special Protection Areas or a high risk flood zone; or
- More than 300m (five minutes walking distance) from a town or village in one of the top three tiers of the Settlement Hierarchy.<sup>24</sup>

11.4.6 The first sieve removed about 80 sites, leaving **176 sites**. It should be noted that outside of the narrow criteria set out above, sites were not excluded at this stage due to having policy constraints, such as being within the Green Belt or within an Area of Outstanding Natural Beauty (AONB).

### Assessing reasonable site options

11.4.7 The next stage of the work involved assessing the remaining sites against a wide range of sustainability related criteria, including -

- Proximity to AONB;
- The extent to which it is at risk of flooding;
- Proximity to a Special Protection Area (SPA);
- Whether it is within the Green Belt; and
- Accessibility to different services.

<sup>24</sup> [http://www.waverley.gov.uk/downloads/download/802/waverley\\_settlement\\_hierarchy](http://www.waverley.gov.uk/downloads/download/802/waverley_settlement_hierarchy)

- 11.4.8 The analysis enabled a red, amber or green (RAG) score to be assigned for each site against each criterion. The criteria that were used (including the thresholds for the RAG assessment) are set out in **Appendix I**. The Appendix sets out to demonstrate that SA was 'integrated' into the development of the SHLAA criteria. The Appendix also presents a high level summary of results.
- 11.4.9 Simultaneously, the Council carried out a review of all Green Belt land to assess the extent to which it fulfils the five purposes set out in the NPPF, as well as a landscape review of the larger settlements.
- 11.4.10 The assessment against sustainability criteria, and the Green Belt/landscape reviews, then informed the next stage of the work: an assessment of the accessibility, suitability, availability and achievability of sites.
- The **suitability** of site options was guided by the existence of environmental constraints, including those considered as part of the sustainability assessment and Green Belt / landscape reviews.
  - Consistent with the high level nature of the rural sites assessment, matters such as **access** to the site and economic viability were not been assessed in detail. These will need to be considered in more detail in a future SHLAA to inform the Local Plan Part 2 (and emerging neighbourhood plans), which will allocate non-strategic sites.
  - Sites promoted in the 2014 call for sites by the landowner (or an agent acting on behalf of a landowner) are assumed to be **available**. Where sites were suggested in a previous call for sites, or were identified through some other means, the original promoter was contacted to check that they still had an intention to develop the land. Where site were suggested by a third party (for example a parish council), efforts were made to identify the landowner only where the site appeared to be a reasonable option for future development. As a result, 32 of the 176 sites assessed in detail were excluded from further consideration, leaving **144 sites**.
  - As most rural sites assessed are on greenfield land and the market for housing in Waverley is buoyant, these sites were assumed to be **achievable** and viable unless the existence of particular constraints (such as contamination or fragmented land ownership) is known about. Any such issues were recorded, but no sites were excluded on this basis.
- 11.4.11 The Council then used this information to assess the timescale and development potential of sites (estimated yield). Where a promoter has themselves suggested a yield, this figure was generally used. Where the promoter did not estimate a yield for their sites, the yield was based on a density calculation (30 dwellings per hectare and a 60% developable area).
- 11.4.12 Site surveys were only carried out when other desktop evidence was insufficient to enable officers to reach a view on the site's suitability. This is consistent with guidance, which states that surveys should be proportionate to the detail required for a robust appraisal.
- 11.4.13 The main output from this work is a series of proformas, one for each rural site that was subject to detailed assessment (i.e. each of the 'reasonable options' known to be available). Each proforma concludes by giving the site in question an indicative summary rating, based on an overall assessment of the site's potential:
- **Green** means the site is more likely to meet the criteria for allocation (either as a strategic site in Local Plan Part 1, or as an allocation in Part 2 or a neighbourhood plan).
  - **Amber** means the site may meet the criteria for allocation.
  - **Red** means the site is less likely to meet the criteria for allocation.
- 11.4.14 Of the 144 available sites that have been assessed in detail, the provisional view (i.e. the view prior to consultation) is that: 15 sites are assigned a **green** rating, 50 sites are assigned an **amber** rating, and 79 sites are assigned a **red** rating.

## 11.5 Detailed SA of initial alternative housing scenarios

### Developing the initial alternatives

- 11.5.1 In light of the three stages of work discussed above, the Council was able to select initial alternative housing scenarios for appraisal in spring 2014. The need to develop 'initial' alternatives reflected time pressures, i.e. the need to undertake early transport modelling, consultation with infrastructure providers, and assessment of the potential impacts on the SPAs and other European designated sites.
- 11.5.2 Work led to the development of four initial alternative housing scenarios. The alternatives varied both in terms of quantum ('how much') and distribution ('where').
- In terms of **quantum** - the alternatives varied between 355dpa and 551dpa, i.e. reflected the possibility of achieving a figure below or above that identified by the draft Strategic Housing Market Assessment (October 2013) as representing 'objectively assessed housing need'.
  - In terms of **distribution** - the main variables were Dunsfold Aerodrome (no development, 1,800 homes or 3,400 homes) and the level of growth at the four main settlements (with the total percentage increase in dwelling stock ranging between 14% and 23%).
    - For each settlement, alternative approaches considered reflected the analysis presented in Table 11.1 above (which presents a high level consideration of whether a town is potentially suitable for low, medium, high or 'very high' growth) with one exception. Whilst Table 11.1 explains that 'high growth' at Godalming is not a reasonable option (i.e. not an option that necessitates testing through appraisal of alternative housing scenarios), in the light of Green Belt considerations, this was not known at the time of developing the initial alternatives for testing, as the Green Belt Review had not been completed at that time.
- 11.5.3 Given the two broad variables (quantum and distribution) there were potentially many alternative housing scenarios that could have been identified / appraised; however, the number of alternatives was limited to four in order to prevent the appraisal becoming unwieldy. The initial alternatives are presented **Appendix II**.

### Appraising the initial alternatives

- 11.5.4 The initial alternatives were appraised by URS and findings fed back to the Council. Appraisal findings can be seen in **Appendix II**. The headline conclusion was as follows –

*The appraisal shows that a low growth approach performs well in terms of a number of environmental objectives, but poorly in terms of 'community and well-being' and 'housing'. It is not suggested that a low growth approach would result in significant opportunities missed in terms of 'economy' related objectives, although the need for housing to support employment growth in the sub-region is a consideration. Indeed it is suggested that low growth could perform well in terms of economic objectives as the effect would be to minimise increases in traffic congestion. If a high growth approach were to be followed – i.e. an approach that involves delivering housing at a level above the objectively assessed need figure – and growth were to be focused around the main settlements, there would likely be significant negative effects in terms of landscape and also biodiversity (on the assumption that sufficient mitigation through delivery of SANG would be difficult to achieve). Traffic congestion around the main settlements and on major routes would also be problematic*

**N.B.** The initial alternatives are not the intended focus of the consultation at the current time. Rather, the alternative housing scenarios that should be a focus of consultation at the current time are those (introduced in Section 11.6) that were developed *subsequent* to the appraisal of the initial alternatives.

## 11.6 Developing alternative housing scenarios

- 11.6.1 Subsequent to the appraisal of initial alternatives the Council recognised that there was a need to refine the alternatives for consultation. In particular, the Council recognised that the alternative housing scenarios that are the focus of consultation should all deliver 8,450 homes over the plan period, which equates to about **470 dwellings per annum (dpa)** over the 18 year plan period.
- 11.6.2 This is the figure that the draft **Strategic Housing Market Assessment (SHMA)** identifies as necessary in order to meet 'objectively assessed housing need'. At the current time, in light of the emphasis placed by the NPPF on seeking to meet objectively assessed housing needs, it would be inappropriate to actively consider a lower growth scenario. However, **there is the potential to revisit the growth quantum in the future**, if consultation and appraisal at the current time calls into question the sustainability of delivering 470 dpa.<sup>25</sup>
- 11.6.3 The alternative housing scenarios are introduced in **Table 11.2**. Points to note about the alternatives are as follows:
- The key variable is Dunsfold Aerodrome. Four alternative approaches are reflected across the scenarios, ranging from 'no development' to development of a 3,400 home scheme.
  - The alternatives reflect a view that no/low growth at Dunsfold Aerodrome will necessitate high growth at Cranleigh, and to a lesser extent Farnham. As can from **Figure 11.1** –
    - The proposed percentage increase in dwelling stock at Cranleigh ranges from 13% to 36%, according to the level of growth at Dunsfold Aerodrome.
    - At Farnham, the proposed percentage increase in dwelling stock ranges from 11% to 23%, according to the level of growth at Dunsfold Aerodrome.
    - By contrast, the proposed percentage increase in dwelling stock at Haslemere is almost constant across the alternatives (ranging between 10% and 11%); whilst the proposed increase in dwelling stock at Godalming is entirely constant (at 11%).
  - With regards to brownfield sites, both within the main settlements and within the villages, the alternatives reflect a single density assumption. The assumption reflects current understanding of the density of housing that is appropriate, on average, when redeveloping sites. There is little or no evidence to suggest that a higher or lower average density warrants consideration. However, the Council is seeking views on density assumptions through the current consultation.

<sup>25</sup> To reiterate, the 470 dpa figure is not 'set in stone' at the current time. Work will continue to assess whether this level of housing will enable sustainable development. This will include an assessment of the implications for infrastructure and an assessment on the impacts of European sites (given the realistic potential to achieve mitigation measures – and in particular Suitable Alternative Natural Greenspace). It is possible that as a result of this on-going work and consultation responses that the Council will conclude that no option that delivers 470 dpa is sustainable and that a different housing target should be pursued.

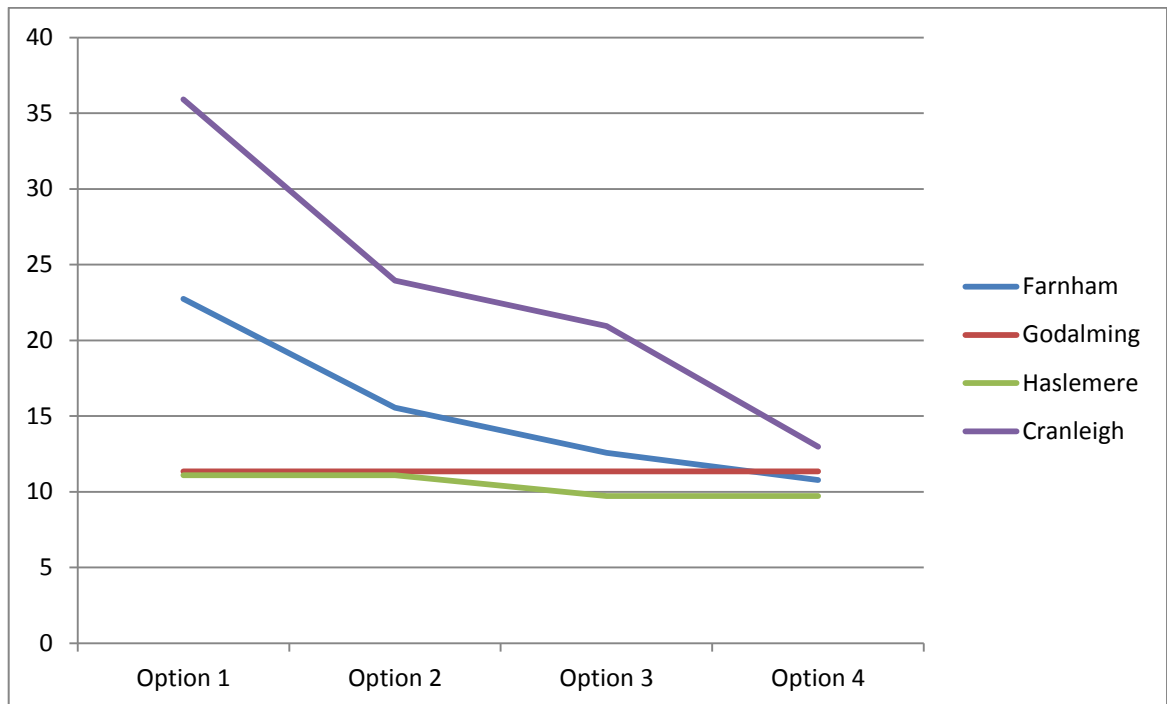
**Table 11.2: Alternative housing scenarios**

Scenario	Completions, permissions, SHLAA sites in settlements & windfalls	Homes on greenfield sites			Homes at Dunsfold Aerodrome	Total Homes	Annual Average
		At the four main settlements	At the 5 larger villages <sup>26</sup>	At villages with limited services			
1	Farnham - 1,100 Godalming - 950 Cranleigh - 350 Haslemere - 600 Villages - 400 <b>Total - 3,400</b>	Farnham - 2,700 Godalming - 100 Cranleigh - 1,450 Haslemere - 200 <b>Total - 4,450</b>	450	150	0	8,450	469
2	Farnham - 1,100 Godalming - 950 Cranleigh - 350 Haslemere - 600 Villages - 400 <b>Total - 3,400</b>	Farnham - 1,500 Godalming - 100 Cranleigh - 850 Haslemere - 200 <b>Total - 2,650</b>	450	150	1,800	8,450	469
3	Farnham - 1,100 Godalming - 950 Cranleigh - 350 Haslemere - 600 Villages - 400 <b>Total - 3,400</b>	Farnham - 1,000 Godalming - 100 Cranleigh - 700 Haslemere - 100 <b>Total - 1,900</b>	400	150	2,600	8,450	469
4	Farnham - 1,100 Godalming - 950 Cranleigh - 350 Haslemere - 600 Villages - 400 <b>Total - 3,400</b>	Farnham - 700 Godalming - 100 Cranleigh - 300 Haslemere - 100 <b>Total - 1,200</b>	300	150	3,400	8,450	469

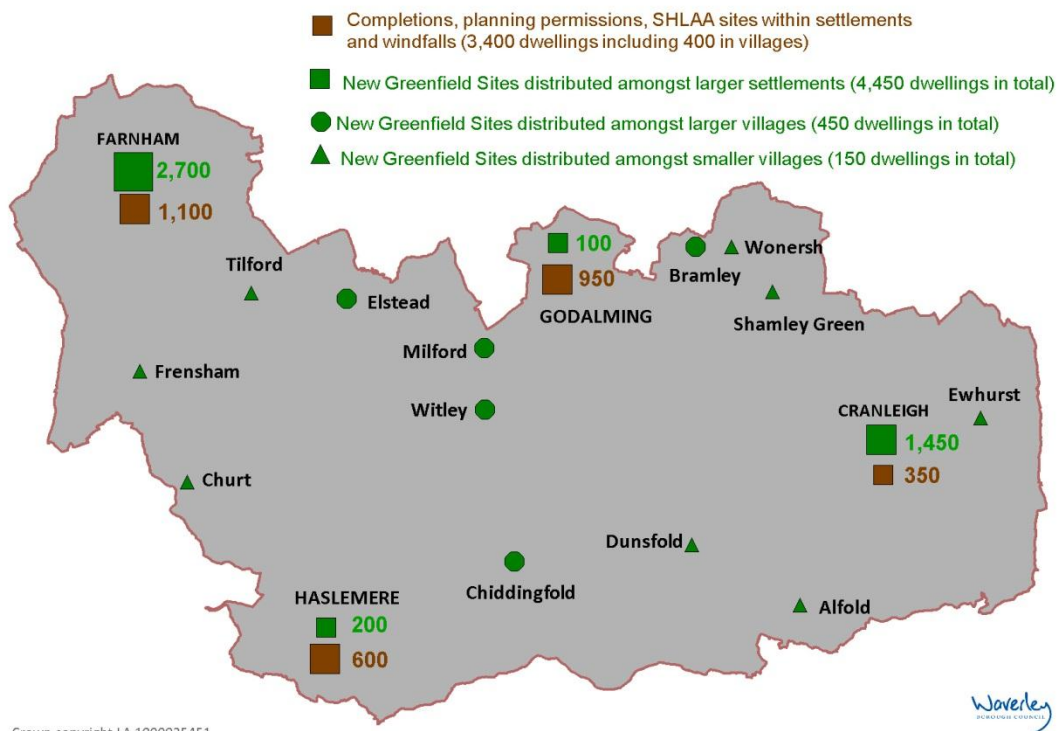
<sup>26</sup> Larger villages are Witley, Milford, Bramley, Chiddingfold and Elstead. Smaller villages are Alfold, Churt, Dunsfold, Ewhurst, Frensham, Shamley Green, Tilford and Womersley



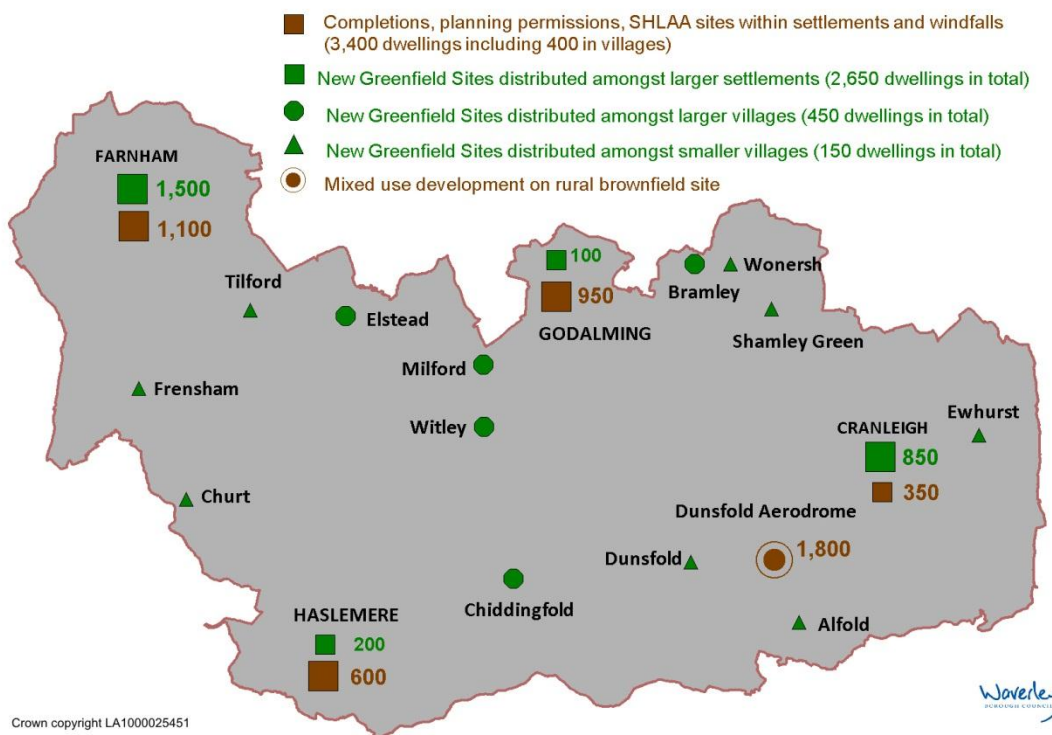
**Figure 11.1:** Chart showing the percentage increase in dwelling stock proposed at each of the main settlements under each of the alternatives



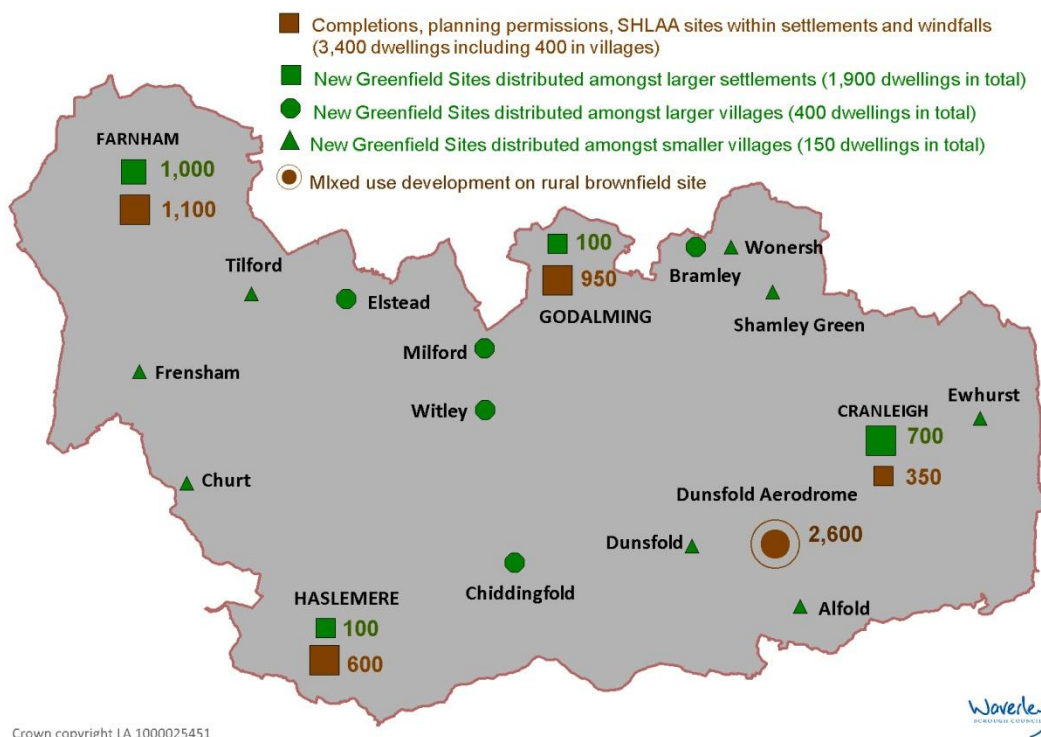
### Housing Scenario 1



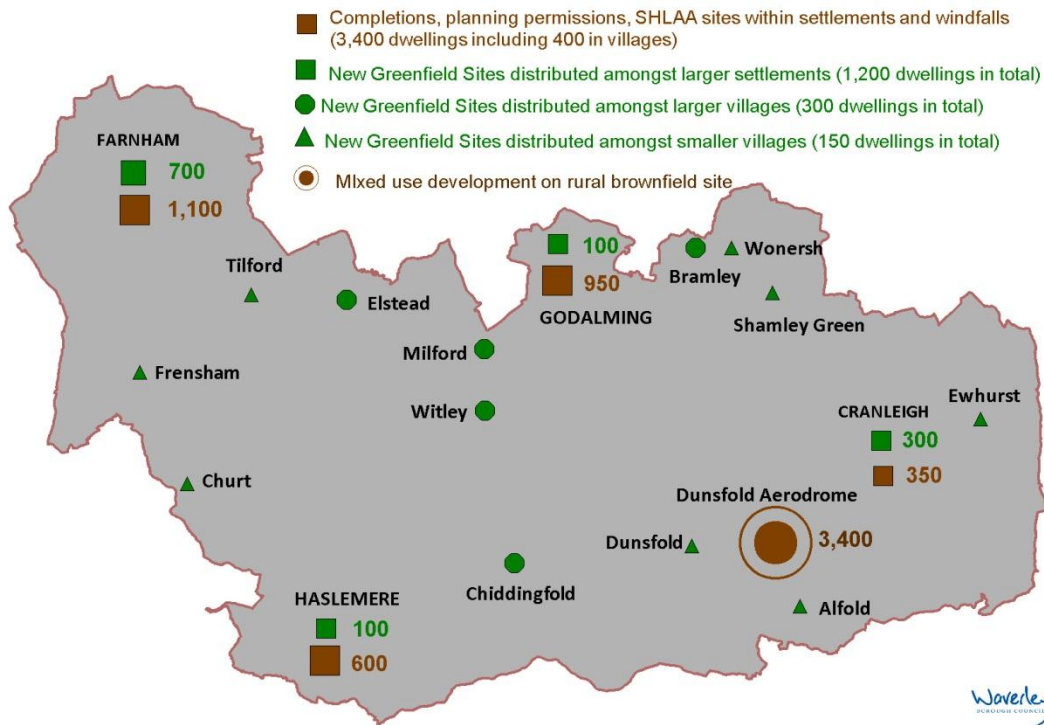
### Housing Scenario 2



### Housing Scenario 3



Housing Scenario 4



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## **PART 3: WHAT ARE THE SA FINDINGS AT THIS STAGE?**

## 12 INTRODUCTION (TO PART 3)

- 12.1.1 The **primarily aim** of this part of the Report is to present appraisal findings in relation to the alternative housing scenarios that are a focus of consultation at the current time. A **secondary aim** is to present appraisal findings in relation to the other plan issues that are addressed within the current consultation document, which relate to Green Belt, Gypsies and Travellers, areas of local landscape importance and planning for employment land.

## 13 APPRAISAL FINDINGS - ALTERNATIVE HOUSING SCENARIOS

### 13.1 Appraisal methodology

- 13.1.1 For each of the scenarios, the appraisal identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Part 1) as a methodological framework. To reiterate, the sustainability topics are as follows:

- Biodiversity
- Climate change mitigation
- Community and well-being
- Economy
- Heritage and townscape
- Housing
- Landscape
- Soils and other natural resources
- Water, flood risk & other climate adaptation issues

- 13.1.2 **Red** text / shading is used to indicate significant negative effects, whilst **green** text / shading is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how the scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text. In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

- 13.1.3 Effects are predicted taking into account the criteria presented within Regulations.<sup>27</sup> So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered (i.e. where the effects of the plan may combine with the effects of other on-going or planned activity that is outside the control of the Waverley Local Plan).

#### Key assumptions

- 13.1.4 Whilst the alternatives are site specific, the sites that are identified are somewhat indicative. There can be little certainty regarding the exact sites that will eventually be found to be suitable and deliverable. As such, the appraisal focuses primarily on 'strategic' characteristics of the alternatives, and gives limited consideration to site specific considerations.
- 13.1.5 On a related point, considerable assumptions have been made regarding what can be achieved through development in terms of the delivery of infrastructure and 'planning gain' more generally. **There is a general assumption made that large schemes will lead to funds being made available to mitigate many of the impacts associated with growth, deliver services / facilities that benefit residents and also deliver infrastructure that brings environmental benefits.** In practice, until detailed investigation is completed, there is considerable uncertainty about what can be achieved.

<sup>27</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

## 13.2 Appraisal findings

13.2.1 Table 13.1 presents appraisal findings in relation to the alternative housing scenarios that are the focus of appraisal at the current time. To reiterate, within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using red / green shading) and also rank the alternatives in order of preference.

**Table 13.1: Appraisal findings: Alternative housing scenarios**

<p>(1) 4,450 homes on greenfield sites at the four main settlements, with no development at Dunsfold Aerodrome</p> <p>(2) 2,650 homes on greenfield sites at the four main settlements, with 1,800 homes at Dunsfold Aerodrome</p> <p>(3) 1,900 homes on greenfield sites at the four main settlements, with 2,600 homes at Dunsfold Aerodrome</p> <p>(4) 1,200 homes on greenfield sites at the four main settlements, with 3,400 homes at Dunsfold Aerodrome</p> <p>N.B. all alternatives involve 8,450 homes in total</p>					
Topic	Discussion of <u>significant effects</u> and <u>rank of preference</u> more generally	Categorisation & rank			
		Scen1	Scen2	Scen3	Scen4
Biodiversity	<p>A key consideration is the potential for impacts to the following internationally important sites: Thames Basin Heaths SPA; Wealden Heaths SPA; and Thursley, Hankley and Frensham Commons SPA. Impacts have been considered through a standalone process of Habitats Regulations Assessment (HRA)<sup>28</sup>, but it is appropriate to recap findings here in addition to considering impacts to 'biodiversity more generally'.</p> <p>The HRA considers the amount of Suitable Alternative Natural Greenspace (SANG) that would be necessitated under each of the scenarios in order to avoid impacts to the Thames Basin Heaths SPA. The principle of using SANG in this way has been established through other plans in the vicinity of this SPA, although in practice the feasibility of extensive SANG provision and adequate ongoing management is uncertain.</p> <p>For the other two SPAs, where the principle of using SANG to avoid visitor pressure is not established, the HRA calculates the expected percentage increase in visitor pressure that would result from each scenario. These sites (as well as the Thames Basin Heaths) are sensitive to visitor pressure given ground-nesting bird species (Nightjar, Woodlark and Dartford warbler).</p> <p>On the basis of these two metrics, the conclusion of the HRA analysis is that (4) would result in the smallest increase in recreational pressure on the SPAs and would trigger the joint lowest provision of additional SANG regarding the Thames Basin Heaths SPA. (4) is therefore preferred from an HRA point of view as it poses the lowest risk to European site integrity.</p> <p>In HRA terms (1) is the least preferable scenario, although that is not to say that it would lead to significant effects to European sites. (1) would necessitate 56.8 ha additional SANG (as compared to 18.4 ha under 4) to avoid impacts to the Thames Basin Heaths SPA, and the deliverability of this is questionable.</p> <p>In terms of increase in visitor pressure to the other two SPAs, (1) would lead to a 3.4% increase (as compared to a 2.9 / 3% increase under 4). Work undertaken recently in relation to the East Hampshire Core Strategy has suggested that a 5% increase is 'significant'.</p> <p>The HRA conclusions reflect the fact that Dunsfold Aerodrome and Cranleigh are relatively distant from the SPAs, although the Aerodrome does just intersect the 9km buffer around the Thursley, Hankley and Frensham Commons SPA. (4) would involve directing 48% of growth to Dunsfold/Cranleigh, whereas (1) would involve directing 21% of growth to this part of the Borough.</p> <p>Leaving aside HRA considerations, however, it is possible to see that there is merit to avoiding large scale development at Dunsfold Aerodrome. Development here could lead to biodiversity impacts given that two SNCIs</p>	4	3	2	1

<sup>28</sup> URS – Habitats Regulations Assessment Analysis of Waverley Borough Council Housing Scenarios to 2031





Topic	Discussion of <u>significant effects</u> and <u>rank of preference</u> more generally	Categorisation & rank			
		Scen1	Scen2	Scen3	Scen4
	<p>intersect the edge of the site, others are located in close proximity and the Chiddingfold Forest SSSI is located 150m away at its nearest point.</p> <p><u>Overall</u>, it is clear that <b>(1)</b> is worst performing. The HRA does not conclude that significant effects are likely to the integrity of European sites on the assumption that suitable SANG can be delivered. Similarly, it is not appropriate for this SA to predict significant negative effects to biodiversity.</p> <p>This SA conclusion is reached taking into account the fact that development of greenfield sites around the main towns will lead to impacts on biodiversity 'more generally' (i.e. leaving aside HRA considerations). There could be some impacts to important habitat (including nationally and locally important sites), but there is little evidence to suggest that impacts will be significant.</p> <p>It is suggested that the best performing approach is <b>(4)</b>, as it would involve focusing the most growth at Dunsfold Park. Development at this location is less than ideal, but is certainly preferable in terms of minimising impacts to internationally important habitats. It is fair to assume that high quality 'green infrastructure' would be designed-in.</p>				
Climate change mitigation	<p>A key consideration here relates to the potential for each scenario to increase or decrease average per capita transport-related CO<sub>2</sub> emissions. Waverley residents currently have high average transport related CO<sub>2</sub> emissions given the rural nature of the Borough and resulting high car dependency.</p> <p>Another consideration relates to the potential to support renewable or low carbon energy infrastructure, and hence minimise CO<sub>2</sub> emissions from the built environment. In practice, this means supporting larger scale developments (of at least several hundred homes), as it is only where development is at scale that delivery of the necessary infrastructure is viable.</p> <p>It is helpful to firstly give consideration to <b>(4)</b>, which would involve high growth at Dunsfold Aerodrome (3,400 homes). This is an isolated location, and hence a high degree of <u>car dependency / need to travel long distances by car</u> can be expected. This conclusion holds true even once account is taken of: the potential for some people to live and work on-site; the likelihood that a high growth approach will enable delivery of a local centre and an enhanced bus service; the potential to support walking/cycling through design-measures; and the fact that residents of nearby rural communities will be able to make use of new services/facilities/employment opportunities etc.</p> <p>However, in terms of the potential to reduce per capita domestic carbon emissions through putting in place <u>renewable / low carbon energy infrastructure</u>, <b>(4)</b> performs very well. A development at this scale would, it is assumed, easily enable delivery of a combined heat and power station fuelled by biomass, with a network of piping to provide 'district heating'. There are likely to be considerable opportunities for heat/power generation from biomass locally, given demand for woodland management.</p> <p><b>(3)</b> would involve a smaller scale scheme at Dunsfold Aerodrome (2,600 homes), but a scheme that is nonetheless of a strategic scale. It can still be expected that a good degree of self-containment would be achieved – i.e. there will be the potential to deliver high quality community infrastructure and a range of employment opportunities - and that ambitious energy/carbon saving measures would be viable.</p> <p><b>(2)</b> would involve a relatively small-scale scheme at Dunsfold Aerodrome (1,800 homes). It could be argued that such an approach would have the benefit of ensuring fewer residents living within an isolated location; however, on balance it is suggested that a smaller scheme is not desirable from a climate change mitigation perspective. There would be considerably less potential for self-containment, and whilst development at this scale would still enable delivery of renewable / low carbon energy infrastructure, it is fair to assume that any such scheme would be less ambitious in terms of carbon savings. It is also possible to assume that there would be decreased likelihood of achieving ambitious sustainable design and construction</p>	★1	4	3	★1

Topic	Discussion of <u>significant effects</u> and <u>rank of preference</u> more generally	Categorisation & rank			
		Scen1	Scen2	Scen3	Scen4
	<p>measures (i.e. achievement of Code for Sustainable Homes Level 5 or 6).</p> <p>(1) would involve focusing development at the main settlements, with no development at Dunsfold Aerodrome. There would be good potential for new residents to access services/facilities and employment opportunities within the main settlements by walking, cycling and public transport; and it is also fair to assume that there could be greater uptake of 'sustainable travel' options amongst existing residents once infrastructure upgrades are in place. It is also assumed that a higher growth strategy around Farnham and Cranleigh will enable achievement of some economies of scale, and hence greater potential to integrate renewable / low carbon energy infrastructure; however, there is little to suggest that opportunities will be 'significant', i.e. of a similar scale to opportunities at Dunsfold Aerodrome.</p> <p><u>In conclusion</u>, it is suggested that (1) and (4) – i.e. the two scenarios that are at the extremes in terms of the balance of growth at the main settlements vs. Dunsfold Aerodrome – perform better than the two middle ground scenarios, i.e. the scenarios that balance growth between the aerodrome and the main settlements. High growth at the main settlements under (1) could possibly support a reduction in average per capita <i>transport</i> related emissions amongst Waverley residents, but this is unlikely. More likely is that the effect is to minimise a future increase. (4) would probably support a reduction in average per capita <i>built environment</i> emissions amongst Waverley residents, but it is not suggested that effects in terms of overall average per capita CO<sub>2</sub> will be 'significant'.</p> <p>A final consideration relates to the proportion of growth directed to the villages. (4) performs best out of the four scenarios in that 10% of growth would be directed to villages, whilst (1) performs joint worst in that villages would receive 12% of growth. Given that car dependency amongst residents of villages is fairly entrenched, growth at villages is to be avoided from a climate change mitigation perspective. This is a notable consideration, but not one that supports a conclusion that (4) is overall better performing than (1).</p>				
Community and well-being	<p>Key considerations include the potential for each scenario to:</p> <ul style="list-style-type: none"> <li>• Ensure access to community infrastructure and services (with capacity) for new and existing residents;</li> <li>• Contribute towards reductions in socio-economic inequality between communities; and</li> <li>• Support good health amongst those living in the Borough.</li> </ul> <p>Dealing firstly with the effect of development on access to community infrastructure / services, the result of an Infrastructure Providers Consultation conducted by the Council indicates few major constraints. Some issues are highlighted around GP surgery capacity, with the potential for capacity to be breached under (1) at Farnham and under (4) at Dunsfold; however, there would be good potential to mitigate effects, i.e. for development to fund enhanced capacity.<sup>29</sup> It is suggested that this would also be the case for other types of community infrastructure (e.g. 'early years' school places, which are at or near capacity at Farnham, Godalming, Milford and Witley).</p> <p>Although not clearly highlighted through the Infrastructure Providers Consultation, there are also concerns (highlighted by the WBC Development Management team tasked with considering the 'cumulative impacts' of the</p>	1	4	3	2

<sup>29</sup> The NHS England Local Area Team highlights the following in relation to Dunsfold Aerodrome: "The Dunsfold Park area is serviced by the Cranleigh and Chiddingfold practices. Cranleigh have recently been subject to a new build, integrating community services on site. It is anticipated that Cranleigh can absorb some of these patients. Chiddingfold has a purpose built practice in Chiddingfold and a small branch surgery in Dunsfold with no room for expansion. Patients would have to travel past the site in Dunsfold to access the Chiddingfold site which is more than 8 miles away. If [a high growth approach] was pursued, we do not feel that there would be the capacity at the Dunsfold Branch surgery to take on these patients. Given the close proximity of both Cranleigh and Chiddingfold Surgeries, we would not support a new GP contract in Dunsfold Park, but the two practices in the area could work with WBC to discuss development of new premises."

Topic	Discussion of <u>significant effects</u> and <u>rank of preference</u> more generally	Categorisation & rank			
		Scen1	Scen2	Scen3	Scen4
	<p>various speculative housing applications that have been received recently) regarding the potential for large scale growth at Cranleigh (most notable under Scenario 1) to put pressure on infrastructure capacity, including community infrastructure.</p> <p>Whilst Dunsfold Aerodrome is an isolated location, a 3,400 scheme <b>(4)</b> would support a sizeable new local centre, which would provide a range of services. It is also the case that there would be good potential to support a high quality bus service, which will be important to ensure that residents without access to a car are able to access higher order services/facilities etc. in Cranleigh/Godalming/Guildford/Horsham. However, at this stage there remains some uncertainty regarding precisely what could be achieved through a 3,400 home scheme, particularly given uncertainty around the need for costly transport infrastructure upgrades.</p> <p>A 2,600 scheme at Dunsfold Aerodrome <b>(3)</b> would also 'deliver', in terms of community infrastructure, to some extent, although it is notable that a scheme of 2,600 at the site was rejected at appeal in 2009 partly on infrastructure grounds. It is likely that a 1,800 scheme <b>(2)</b> would perform relatively poorly.</p> <p>A related consideration is 'access to services/facilities etc. for rural residents. There are identified issues associated with rural communities in the Borough, and associated with rural communities in neighbouring Horsham District, where there is a poor bus service. A new local centre at Dunsfold Aerodrome – likely to be of a high quality under <b>(3)</b> and <b>(4)</b> - could lead to notable benefits.</p> <p>In terms of addressing localised issues of relative <u>deprivation</u>, it is the case that <b>(1)</b> performs best; however, it is not clear that effects would be particularly notable. Areas of relative deprivation are to be found within localities on the outskirts of Farnham and Godalming, and hence (1) may lead to some benefits if it is the case that additional housing means that a major new employer is attracted to the area, or there is an enhancement in the capacity of community infrastructure / service provision locally.</p> <p>In terms of supporting good health, there are two important considerations. Firstly, there is a need to support and encourage walking/cycling, and secondly there is a need to avoid worsening existing issues of poor air quality in Farnham and Godalming. In terms of the former, it is difficult to be certain regarding the relative merits of the scenarios, however, it could be suggested that <b>(2)</b>, <b>(3)</b> and <b>(4)</b> perform well on the basis that a major new development at Dunsfold Aerodrome will enable the potential for well-planned green infrastructure and walking/cycling infrastructure. In terms of the latter, it is safe to assume that <b>(1)</b> is worst performing on the basis that high growth at Farnham will lead to worsened traffic congestion. Traffic at Cranleigh could also become an issue.</p> <p><u>In conclusion</u>, it is suggested that <b>(1)</b> and <b>(4)</b> – i.e. the two scenarios that are at the extremes in terms of the balance of growth at the main settlements vs. Dunsfold Aerodrome – perform better than the two middle ground scenarios, i.e. the scenarios that balance growth between the aerodrome and the main settlements. This conclusion reflects an overriding assumption that focusing growth leads to opportunities for the development sustainable communities, and minimising adverse effects of growth. It is not suggested that significant effects will result, however. On balance, it is suggested that uncertainties around Dunsfold Aerodrome (see above) mean that (1) is preferable to (4).</p> <p>A final consideration relates to the proportion of growth directed to the villages. (1) and (2) perform best out of the four scenarios in that 12% of growth would be directed to villages, whilst (4) performs worst in that villages would receive 10% of growth. There is a need to support growth at villages in order to maintain the vitality of village centres. This is a notable consideration, but not one that supports a conclusion that (1) is overall better performing than (4).</p>				

Topic	Discussion of <u>significant effects</u> and <u>rank of preference</u> more generally	Categorisation & rank			
		Scen1	Scen2	Scen3	Scen4
Economy	<p>An Employment Land Review (ELR) study has recently indicated that demand for additional employment land in the Borough in various sectors will grow. There is no indication, however, that demand for employment land is related to the housing growth strategy to any great extent, i.e. there is no indication that major opportunities exist to stimulate economic growth by following a particular (reasonable) housing growth strategy.</p> <p>A focus of appraisal, therefore, must be on the potential for housing growth strategy to <i>avoid hindering</i> economic growth. In particular, there is a need to appraise the alternatives in terms of their potential to avoid worsening <u>traffic congestion</u> on key routes through increased commuting.</p> <p>The traffic growth / congestion implications of the 'initial alternatives' (see appraisal under the 'Economy' heading in Appendix 2) were considered through Strategic Transport Assessment (STA) carried out by Surrey County Council. STA findings are relevant to the assessment of the four alternatives that are the focus of consultation and appraisal at the current time.</p> <p>A key message that emerged from the STA (see detailed discussion in Appendix 2) is that there is benefit to following a strategy that focuses growth at Dunsfold Aerodrome in the sense that increased traffic congestion around the towns will be avoided and <i>average</i> traffic congestion across the Borough will be minimised (and hence <i>average</i> traffic speed maximised). This is an important consideration from a perspective of wishing to support the local economy, and is reflected in the conclusion that <b>(4)</b> performs well. However, it is also important to consider that high growth at Dunsfold Aerodrome (4) would also lead to traffic impacts in the vicinity, including traffic that would impact on Cranleigh. Impact of traffic on the local road network was the main reason why the planning application for a new settlement at Dunsfold Aerodrome was previously rejected by the Secretary of State. There is the potential to mitigate impacts through infrastructure capacity upgrades, but feasibility/viability is uncertain at the current time.</p> <p><u>Further important considerations</u> are as follows:</p> <ul style="list-style-type: none"> <li>• A concern of businesses in this area is the high cost of housing and the issues this raises in terms of the recruitment and retention of staff. Whilst an increase in housing generally across the Borough should have a positive effect, these benefits may be less for any scenarios that focus development in the south east of the Borough, i.e. away from the main towns. The SHMA provides evidence of the need for affordable housing in different parts of Waverley, and the highest need is in Farnham.</li> <li>• Growth at Dunsfold Aerodrome will involve employment development. An approach that involves strengthening the role of the main settlements as employment hubs would be preferable, but it is not clear that any of the scenarios will have this effect to any significant extent.</li> </ul> <p><u>In conclusion</u>, there are clearly competing objectives, i.e. objectives that 'pull in different directions'. On the one hand, there is a desire to minimise traffic congestion, whilst on the other there is a need (as highlighted by emerging work by the M3 LEP) to deliver housing at locations in proximity to where businesses wish to locate. On balance, it is suggested that a Dunsfold Aerodrome led scenario <b>(4)</b> performs best, but there is uncertainty.</p>	2	3	2	
Heritage	<p>There is the potential for growth at the main settlements to put pressure on the integrity of historic cores / Conservation Areas, e.g. through increased traffic. This is a key consideration, and is reflected in the rankings assigned to the alternatives, however it is recognised that in practice growth can also bring with it investment in high streets that can support conservation of the historic environment and more general maintenance of historic character.</p> <p>High growth at Dunsfold Aerodrome <b>(4)</b> is shown to perform relatively well, although it is recognised that there is the potential for impacts to heritage assets. This is particularly the case as there could be pressure placed on the Conservation Areas at nearby Dunsfold and Alfold villages, and the</p>	4	3	2	

Topic	Discussion of <u>significant effects</u> and <u>rank of preference</u> more generally	Categorisation & rank			
		Scen1	Scen2	Scen3	Scen4
	<p>Conservation Area at Bramley to the north, which would be impacted by traffic passing along the A281.</p> <p>Another important consideration relates to the amount of growth directed to villages. On balance, it is appropriate to suggest that growth does have the potential to lead to negative impacts, although again it is recognised that this will often not be the case and indeed in some instances growth at villages can support the vitality/functioning of high streets and in this way lead to heritage benefits. <b>(4)</b> would involve less growth at the larger villages than the other three scenarios (300 dwellings in total, rather than 450) given the acceptance of a large scheme at Dunsfold Aerodrome.</p> <p>It is not suggested that any of the scenarios would be likely to lead to <i>significant</i> effects, although it is recognised that there is the possibility of significant negative effects to arise under any scenario if it is the case that nationally important assets are impacts, or historic character associated with a village, town or landscape area eroded to a significant extent.</p>				
Housing	<p>All alternatives would involve delivering 8,450 new homes, which equates to about 470 dwellings per annum over the 18 year plan period. This approach is in-line with the conclusions of the draft Strategic Housing Market Assessment (SHMA), and hence it can be concluded that this approach will ensure that 'objectively assessed housing needs' are addressed.</p> <p>There is evidence to suggest that affordable housing is greatest within the north and west of the Borough, and hence an approach that focuses growth at Cranleigh and Dunsfold Aerodrome is less than ideal. <b>(4)</b> would involve targeting 48% of new homes to these areas. It is also fair to say that focusing growth at Dunsfold Aerodrome would fail to meet needs associated with any of the main settlements. This is reflected in the suggestion that <b>(1)</b> performs better than <b>(2)</b> and <b>(3)</b>.</p> <p>In terms of ensuring a mix of market housing, meeting affordable housing needs and also providing specialist housing to meet the needs of the elderly and other specific groups, there is some basis to suggest that an approach that supports larger development schemes would perform better. This is a lesser consideration, however, and has not influenced the rankings.</p>	★ 1	2	3	4
Landscape	<p>It is helpful to deal firstly with <b>(1)</b>, which would involve focusing growth at the main settlements, with no development at Dunsfold Aerodrome. The scale of growth at Farnham, Haslemere and Cranleigh would be greater than under other scenarios, and there would also be higher growth at the villages.</p> <p>It would seem that at Farnham (greenfield land for 2,700 homes, a figure equating to 16% of the current dwelling stock) and Cranleigh (greenfield land for 1,450 homes, a figure equating to 29% of the current dwelling stock) there is the likelihood of significant changes to landscape character. At Haslemere, the scale of greenfield development under consideration is much more modest (greenfield land for 200 homes, a figure which equates to 3% of the current dwelling stock), but the landscape effect could also be significant given that the town is surrounded by the AONB.</p> <p>At Farnham there is the potential for landscape impacts given the presence of the AGLV, and more generally the fact that there will be a significant contribution to the urbanisation of the A31 corridor which links Farnham, Aldershot, Farnborough, Camberley and northward to Reading; however, the Landscape Study has found that parts of Farnham are less sensitive in landscape terms with more development potential. At Cranleigh, there are fewer obvious strategic considerations, but it is accepted that Cranleigh is a smaller settlement with a 'village feel' that would be put at risk by growth.</p> <p>Given the above considerations, there is the likelihood of <b>(1)</b> leading to <b>significant negative effects</b> on the landscape baseline.</p> <p>Differentiating between the merits of <b>(2)</b>, <b>(3)</b> and <b>(4)</b> primarily necessitates considering the landscape merits of development at Dunsfold Aerodrome vs. development around the main settlements. It is generally accepted that</p>	4	3	2	★ 1



Topic	Discussion of <u>significant effects</u> and <u>rank of preference</u> more generally	Categorisation & rank			
		Scen1	Scen2	Scen3	Scen4
	Dunsfold Aerodrome (a brownfield site) is not a sensitive location, relative to the settlement edges. Whilst the AGLV skirts the site (and intersects to a small extent), the AONB is located 1.2km north-west.				
Soils and other natural resources	<p>A primary consideration here relates to the loss of greenfield, agricultural land to development. In this respect, there are clearly benefits to focusing growth at Dunsfold Aerodrome as this is largely a brownfield site.</p> <p>It is appropriate to 'flag' the potential for <b>significant negative effects</b> to result from an approach that would focus growth on greenfield sites (1) and <b>vice versa</b>; however, that is not necessarily to suggest that there will be significant loss of 'best and most versatile' agricultural land. There is no grade 1 agricultural land in Waverley and only pockets of grade 2 land.</p>	4	3	2	1
Water, flood risk and other climate change adaptation issues	<p>A key consideration relates to water treatment infrastructure, i.e. the potential to locate growth in such a way as to ensure that capacity is not at risk of being breached (which can result in water pollution incidents).</p> <p>It is not clear that flood risk is a strategic issue locally, i.e. an issue that should drive consideration of alternative housing scenarios. Nor is it suggested that water use / efficiency considerations have a bearing on this appraisal.</p> <p>Both Southern Water and Thames Water have already been contacted with regards to the alternative housing scenarios.</p> <p>SW are of the view that <i>"Wastewater capacity should not be seen as a constraint to development... Necessary investment in strategic infrastructure can be delivered in parallel with development... The Local Plan should contain a general policy to co-ordinate the timing of development with the provision of infrastructure... We also look to the Local Plan to prevent development close to wastewater treatment facilities and not contain policies that would unduly restrict the delivery of essential infrastructure."</i></p> <p>TW go slightly further, highlighting that -</p> <ul style="list-style-type: none"> <li>In Farnham there are local capacity constraints in the sewerage network, but it is difficult to accurately identify the infrastructure upgrades needed at this stage.</li> <li>In Cranleigh/Dunsfold/Ewhurst/Hascombe/Rowly/Ewhurst Green/Alfold there are concerns about waste water services at Cranleigh Sewage Treatment Works (STW) and existing sewage treatment capacity is unlikely to be able to support anticipated demand.</li> </ul> <p>TW do not suggest that there will be any absolute constraints to growth, however, stating that: "In the event of an upgrade to TW assets being required, up to three years lead in time will be necessary." On this basis, it is not appropriate to distinguish between the merits of the alternatives. Water infrastructure upgrades are likely to be feasible, although whether they are viable is another question.</p> <p>N.B. TW has also commented on water supply, stating that: <i>"The supply area is a discrete zone and there are very limited options to bring water in from other areas. Based upon the information provided, TW do not anticipate any show-stoppers regarding water supply. However, more information on the phasing and timescales of the developments will allow us to understand whether the proposed level of growth has been accommodated for within the water resources management plan."</i></p>	N/a	N/a	N/a	N/a

**Table 13.2: Summary findings and conclusions**

(1) 4,450 homes on greenfield sites at main settlements, with no Dunsfold Aerodrome development (2) 2,650 homes on greenfield sites at the main settlements, with 1,800 homes at Dunsfold Aerodrome (3) 1,900 homes on greenfield sites at the main settlements, with 2,600 homes at Dunsfold Aerodrome (4) 1,200 homes on greenfield sites at the main settlements, with 3,400 homes at Dunsfold Aerodrome				
Topic	Categorisation & rank			
	Scenario 1	Scenario 2	Scenario 3	Scenario 4
Biodiversity	4	3	2	1
Climate change mitigation	1	4	3	1
Community and well-being	1	4	3	2
Economy	2	3	2	1
Heritage	4	3	2	1
Housing	1	2	3	4
Landscape	4	3	2	1
Soils and other natural resources	4	3	2	1
Water, flood risk and other climate change adaptation	N/a	N/a	N/a	N/a
<b>Summary and conclusions</b> <ul style="list-style-type: none"> <li>Starting with <b>biodiversity</b>, Scenario 4 is best performing primarily on the basis that growth would be directed away from the European designated sites. Scenario 1 performs least well, although it is not possible to conclude significant negative effects at this stage as work is ongoing to assess whether sufficient Suitable Alternative Natural Greenspace (SANG) can be delivered.</li> <li>With regard to <b>climate change mitigation</b>, the suggestion is that growth should either be focused at Dunsfold Aerodrome (Scenario 4) or at the main settlements (Scenario 1). It is suggested that a 'middle-ground' approach would perform least well, as there would be the likelihood of increases in per capita CO<sub>2</sub> emissions from transport, and missed opportunities in terms of minimising per capita CO<sub>2</sub> emissions from the built environment.</li> <li>A similar conclusion is reached for '<b>Community and well-being</b>', i.e. it is suggested that growth should be concentrated, whether that be at Dunsfold Aerodrome or around the main settlements. On balance, however, it is suggested that Scenario 1 is preferable to Scenario 4, given uncertainties around the potential to deliver necessary infrastructure at Dunsfold Aerodrome.</li> <li>The discussion under the '<b>Economy</b>' heading focuses to a large extent on traffic congestion issues. It is the case that Scenario 4 could help to avoid worsened traffic congestion around the main towns, although there would obviously be more localised issues in the vicinity of Dunsfold Aerodrome (plus there is a need to factor-in uncertainty around capacity upgrades). Another important issue, which serves to highlight weaknesses in Scenario 4 and the benefits of Scenario 1, is the need to deliver housing at locations where businesses wish to locate, which means delivering housing at the main settlements (particularly in the west of the Borough).</li> </ul>				

Topic	Categorisation & rank			
	Scenario 1	Scenario 2	Scenario 3	Scenario 4
<ul style="list-style-type: none"> <li>• <b>Heritage</b> is perhaps a less fundamental consideration (i.e. it would be possible to avoid / minimise impacts under any scenario), but on balance it is suggested that focusing growth at Dunsfold Aerodrome would be preferable to focusing growth at the main settlements (with consequent increases in traffic affecting historic centres). It is recognised that growth at Dunsfold Aerodrome would also lead to some impacts to Conservation Areas at nearby villages.</li> <li>• All alternatives would lead to <b>significant positive effects</b> in terms of <b>housing</b> on the basis that the 'objectively assessed housing need' figure for the Borough would be achieved. However, Scenario 4 performs least well given that housing need is primarily focused in the north and west of the Borough.</li> <li>• <b>Landscape</b> is a key consideration locally given the sensitivities that exist. Scenario 1 would likely lead to <b>significant negative effects</b>. Locally important landscapes would certainly be impacted, there would be an erosion of the historic settlement pattern in the Borough's north and west and the 'village feel' of Cranleigh would likely be lost.</li> <li>• <b>'Soil and other natural resources'</b> is perhaps a less fundamental consideration, but it is obviously the case that Scenario 1 would lead to <b>significant negative effects</b> as growth would be focused on greenfield land. Scenario 4, on the other hand, would lead to <b>significant positive effects</b> as growth would be focused to a large extent on previously developed land at Dunsfold Aerodrome.</li> <li>• <b>Water / flood</b> risk issues are not a relevant in that it is likely that effects can be avoided / minimised under any scenario.</li> </ul> <p>The appraisal serves to highlight that there are benefits to focusing growth, and that both of the approaches that might be taken (i.e. focusing growth at the main settlements, or focusing growth at Dunsfold Aerodrome) have pros and cons.</p> <p>It is important to reiterate at this point that <b>more work needs to be done</b> to assess the impacts of scenarios before the Council can decide on its preferred strategy. In particular work still needs to be done to decide whether the transport impacts identified in the Strategic Transport Assessment can be mitigated and if so how. There is also a need to complete discussions with other infrastructure and service providers. Finally there remains a need to draw a conclusion on the potential effects on European sites. As part of this, there is a need to complete on-going work that aims to identify the level of SANG that can be delivered around Farnham to mitigate the effects of housing growth.</p>				

## 14 APPRAISAL FINDINGS – OTHER PLAN ISSUES

### 14.1 Introduction

- 14.1.1 The aim of this chapter is to present brief, high-level appraisal ‘commentaries’ in relation to the other plan issues that are a focus of the consultation at the current time.

### 14.2 Green Belt

#### Background

- 14.2.1 As part of the evidence to support the Local Plan, a Green Belt Review has been undertaken. The Review concluded that the Waverley Green Belt is largely performing the function set out in the NPPF and that the scope to remove land from it is fairly limited. With regards to the **main settlements**, the Review identifies some areas around Godalming where there may be scope to remove land from the Green Belt, but no such areas were identified around Haslemere. The Review also considered various options for the **villages** in Waverley that are currently ‘washed over’ by the Green Belt designation.
- 14.2.2 In some cases those **villages** have a settlement boundary and, notwithstanding that they are in the Green Belt, Local Plan policies allow for some development to take place within the settlement. The NPPF provides policy guidance on how villages in the Green Belt should be treated. Where the open character of a village makes a contribution to the openness of the Green Belt those villages should remain within the Green Belt. Where this is not the case, the advice is that the village should be removed from the Green Belt and other means (such as conservation area or specific planning policies) should be used to protect the character of the village. The Green Belt Review has recommended that the Council consider removing the following villages from the Green Belt and that their settlement boundaries should also be reviewed: Chiddingfold, Elstead, Milford and Witley. In addition, the Review recommends keeping Bramley, Churt and Womersley in the Green Belt, but reviewing settlement boundaries:
- 14.2.3 The consultation document asks the question: *Do you agree that the potential changes to the Green Belt that have been recommended in the Waverley Green Belt Review are appropriate?*

#### Appraisal commentary

- 14.2.4 The appraisal of alternative housing scenarios presented above (Chapter 13) necessarily gives limited consideration to the implications for villages, on the basis that implications for any particular village are difficult to pin-down at this stage (and there is limited space for discussion in the appraisal table). However, it is appropriate here to give further consideration to the possible implications of the housing scenarios for villages, taking into account proposals to remove (‘inset’) some villages from the Green Belt and amend settlement boundaries.
- 14.2.5 Although the Green Belt review recommends that some villages are inset from the Green Belt (in accordance with guidance in the NPPF), in practice, the removal of the settlement from the Green Belt may not, in itself, result in significant change. This is because many of the villages in Waverley that are currently washed over by Green Belt designation already have a settlement boundary defined in the Local Plan. The significance of this is that Local Plan Policy RD1 (which applies to land within settlement boundaries, whether or not they are in the Green Belt) provides for development to take place if certain criteria are met. The potentially more significant issue is the change to the settlement boundary of the villages that are suggested for inset from the Green Belt, as this will increase the area where new development could potentially take place. The Green Belt Review recommends certain villages for inset and gives a broad indication of where changes could be made to settlement boundaries; and the analysis of promoted greenfield sites has taken into account the recommendations of the Green Belt Review. However, it does not follow that because the Green Belt boundary changes development within the entire area removed from the Green belt can take place.

- 14.2.6 It is currently intended that Local Plan Part 1 will identify which villages are to be inset from the Green Belt and broadly where the boundary changes are expected. Part 2 of the Local Plan will define the boundary precisely and also include any specific housing site allocations in the villages.
- 14.2.7 In developing the scenarios for housing location, which are the focus of the present consultation, the Council has taken into account the extent to which sites are likely to be available in areas where the Green Belt boundary is likely to change. In relation to this, Milford and Witley are the villages where there appears to be the greatest potential for additional development as there are sites being promoted for development by landowners/developers in locations where the Green Belt Review has recommended settlement boundary changes. It also happens to be the case that Milford and Witley both have train stations.
- 14.2.8 The Green Belt Review will not be the only factor in deciding whether land around villages could be suitable for development. For example, Elstead, Chiddingfold and parts of Milford and Witley are within the AONB.
- 14.2.9 In terms of the villages not proposed for inseting, the Green Belt Review explains the reasons. Whilst in these cases there may still be adjustments to the settlement boundary, it is not expected that changes in these villages will result in a significant increase in the amount of development coming forward in the future.



## 14.3 Gypsies, Travellers and Travelling Showpeople

### Background

- 14.3.1 The Traveller Accommodation Assessment (TAA) 2014 provides up-to-date evidence on the current and future need for accommodation for Gypsies, Travellers and Travelling Showpeople. This shows that there is no requirement for additional pitches within the period 2012 to 2017, taking account of vacancies and the additional pitches that will result from existing planning permissions. Beyond this, the study indicates a need for 37 pitches in the period from 2017 to 2027.
- 14.3.2 The Local Plan Part 1 will include the target for new pitches as well as a criteria-based policy setting out the approach to identifying specific sites. The identification of sites and their allocation will be dealt with through Part 2 of the Local Plan.
- 14.3.3 The proposed approach to identifying sites involves following a sequential approach:
1. Intensification of existing sites;
  2. Suitable extensions to existing sites; and
  3. Use of suitably located previously developed land.
- 14.3.4 Other criteria are also proposed, including criteria covering access, amenity, access to services, etc. It is also proposed that traveller sites in the Green Belt should only be supported in very exceptional circumstances.
- 14.3.5 The consultation document asks the question: *Do you agree that the proposed approach to identifying sites for Gypsies, Travellers and Travelling Showpeople is appropriate?*

### Appraisal commentary

- 14.3.6 The sequential approach proposed may well be best performing overall, when appraised in terms of sustainability issues/objectives that reflect the needs of both the settled and travelling community and also reflect environmental considerations; however, it is worthwhile noting that there could be some draw-backs to this sequential approach. Specifically, an approach that focuses first and foremost on 'intensification of existing sites and extensions to existing sites' could potentially run the risk of supporting the needs of particular groups (often family groups) within the travelling community, but not meeting wider need. This is an issue that is increasingly being recognised nationally, as the practice of accommodation needs assessment for Gypsies, Travellers and Travelling Showpeople improves. This issue may not be entirely relevant to Waverley, but it is something that may need further consideration prior to the plan being finalised.
- 14.3.7 It is also notable that the preferred approach is to encourage sites on previously developed land (as opposed to greenfield land) and rule out the provision of new sites in the Green Belt except in exceptional circumstances. Again, whilst this approach may well be justified – when considered against the SA framework – there could be some draw-backs. Specifically, it could be that this approach is not ideal in terms of meeting accommodation needs given the need for space on site (for business uses in particular) and suitable access arrangements (including wide turning circles).

## 14.4 Landscape designations

### Background

- 14.4.1 A number of areas of local landscape importance are identified in the Borough. The most extensive area is the Area of Great Landscape Value (AGLV).
- 14.4.2 Natural England is proposing to carry out a review of the boundary of the Surrey Hills AONB and this could result in some existing AGLV land being incorporated into the AONB. In the light of this, the Council propose to retain the existing AGLV designation until the AONB boundary review has been completed.
- 14.4.3 With regards to the other local landscape designations affecting the countryside outside the settlement areas, the Council has commissioned a Landscape Study to examine the justification for designating each of the parcels of land in question. The study has identified several areas of land that should not be covered by a local landscape designation.
- 14.4.4 The consultation document asks the questions:
- *Do you agree that the Council should retain its AGLV designation until after the review of the Surrey Hills AONB has been completed?*
  - *Do you agree that the Council should retain its existing local landscape designations (Areas of Strategic Visual Importance / Areas of Historic Landscape Value / Farnham Aldershot Strategic Gap / Godalming Hillsides)?*

### Appraisal commentary

- 14.4.5 There is obviously merit in understanding how the landscape sensitivity varies locally, so that this information can be to hand when considering housing growth scenarios / making decisions on site allocations / determining planning permissions and setting planning conditions.
- 14.4.6 The Landscape Study appears to confirm which areas are the most sensitive locally, outside of the AONB, and hence should be given a 'local designation' which amounts to a policy presumption of little or no capacity for development that would erode the existing character. This approach would appear to be sensible / appropriate, although another approach (which might aid clarity) would be to establish relative sensitivity / capacity for all landscape character areas in the Borough.

## 14.5 Employment land

### Background

- 14.5.1 The latest projections indicate that there will be an overall need for 10.1 hectares of employment land over the period 2013 to 2031. This assumes that the need for additional B1a/b and B8 land cannot be met by the likely surplus of Class B1c and B2 land (0.5 ha and 2.9 ha respectively) identified in the same period. If it can, then only 6.7 hectares of net additional employment land will be needed.
- 14.5.2 Consultation has also indicated a demand for premises for small and medium sized businesses and there is some concern that there may be a lack of flexibility from the Borough's existing premises to meet this need.
- 14.5.3 The consultation document asks the question: *Do you agree that it is important that the Local Plan protects existing employment land and identifies and allocates new land for employment uses?*

### Appraisal commentary

- 14.5.4 From an SA perspective, there is certainly merit in protecting existing employment land and allocating new land for employment uses. This reflects the fact that 'minimising commuting by car' is a key sustainability objective, albeit one that can only be achieved to a certain extent in Waverley. The Council will need to engage with the Local Enterprise Partnership ('Enterprise M3') to ensure that strategic opportunities for employment growth are being capitalised upon.

## **PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?**

## 16 INTRODUCTION (TO PART 4)

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

## 17 PLAN FINALISATION

- 17.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012.<sup>30</sup> The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report and responses to the current consultation.
- 17.1.2 **The SA Report** (as opposed to an Interim SA Report) will be published alongside the Proposed Submission Plan. It will provide all of the information required by the SEA Regulations 2004.
- 17.1.3 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 in-light of representations received the plan can still be deemed 'sound'. Assuming that this is the case, the Plan will be submitted for Examination. A statement setting out the main issues raised during the consultation on the Proposed Submission Plan will also be submitted, for consideration at Examination. The Council may also submit a schedule of proposed modifications to the plan. If this is the case, then the SA Report may be updated to reflect the plan as modified.
- 17.1.4 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 the need for modifications to the Plan these will be prepared and then subjected to consultation. An SA Report Addendum may be published alongside modifications.
- 17.1.5 Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must published that sets out (amongst other things) 'the measures decided concerning monitoring'.

<sup>30</sup> It is unlikely that further consultation will be necessary prior to preparing the Proposed Submission Plan; however, the possibility cannot be ruled-out. The Council will decide a course of action subsequent to the current consultation, and then will have to be prepared to adapt to an evolving situation.

## APPENDIX I: RURAL SITE OPTIONS APPRAISAL

As explained in Part 2, 144 reasonable site options outside of the existing urban areas were subjected to sustainability appraisal in order to inform the selection of alternative housing scenarios. This Appendix explains the methodological approach taken, and presents summary appraisal findings. More detailed appraisal findings are available upon request.

### Methodology

The large number of site options involved necessitated development of a bespoke methodology. It was not possible to simply apply the SA framework (i.e. the list of topics, issues and objectives) established through scoping. The framework, whilst suitable for appraising alternative / draft policy approaches, is not suited for appraising a large number of site options.

The site options methodology is essentially a list of 'criteria' developed to reflect the SA framework as closely as possible. The criteria are mainly location / distance related and hence it was possible to use Geographical Information Systems (GIS) software to quantify performance.

The criteria are listed in **Table A**, which also:

- Demonstrates the links between the criteria and the SA framework, and highlights the limitations in the methodology. Limitations are inevitable, given limited data availability. It is only possible to draw on data-sets that cover the entire district (at a useful spatial resolution) given that site options are spread Borough-wide and there is a need to ensure consistency of assessment, i.e. a 'level playing field'.
- Presents the Red/Amber/Green (RAG) thresholds that are applied as a tool to aid communication, i.e. 'at a glance' differentiation between options.

N.B. A draft version of this site options appraisal methodology was presented within the draft Scoping Report, which was published for consultation in March 2014. An explanation of how consultation responses have been taken on-board is presented within the final Scoping Report, which is available on the Council's website at [www.Waverley.gov.uk/newlocalplan](http://www.Waverley.gov.uk/newlocalplan).



**Table A** Site options appraisal methodology

Criteria	'RAG' thresholds	Discussion
Intersects with a flood zone?	<p><b>R</b> = &gt; 50% intersects with Flood risk zone 2 or 3</p> <p><b>A</b> = &lt; 50% intersects with Flood risk zone 2 or 3</p> <p><b>G</b> = Flood risk zone 1</p>	<p><b>Flood risk</b> is the key climate change adaptation issue for the Borough, and <b>good data</b> is available to inform site options appraisal.</p> <p>Surface water flooding can be less problematic than fluvial (river) flooding; however, it is important to consider surface water flood risk nonetheless.</p> <p>N.B. It is important to avoid development in flood zones; however, there is the potential to address flood risk at the development management stage, when a 'sequential approach' can be taken to ensure that uses are compatible with flood risk. There is also the potential to design-in Sustainable Drainage Systems (SuDS).</p>
Intersects with a surface water flood zone?	<p><b>R</b> = &gt; 50% intersects with 1 in 30 or 1 in 100 year risk</p> <p><b>A</b> = &lt; 50% intersects with 1 in 30 or 1 in 100 year risk; or &gt; 50% intersects with 1 in 1000 year risk</p> <p><b>G</b> = No surface water flood risk</p>	
Proximity to a Special Protection Area, Special Area of Conservation or Ramsar site?	<p><b>R</b> = &lt;400m</p> <p><b>A</b> = 400m - 5km</p> <p><b>G</b> = &gt;5km</p>	<p>Development on or in close proximity (given impacts associated with, for example, visitor pressure) could have negative effects on the <b>biodiversity</b> value of 'wildlife sites'. <b>Good data</b> is available to inform site options appraisal, although it might ideally be possible to draw on further data-sets.</p> <ul style="list-style-type: none"> <li>There are datasets showing the location of internationally and nationally designated sites. The RAG thresholds proposed reflect the need to protect sites in a manner appropriate to their importance, with internationally designated sites (SAC, SPA and</li> </ul>
Proximity to a Site of Special Scientific Interest (SSSI)?	<p><b>R</b> = &lt;200m</p> <p><b>A</b> = 200 – 800m</p> <p><b>G</b> = &gt;800m</p>	

Criteria	'RAG' thresholds	Discussion
Proximity to an ancient semi-natural woodland (ASNW), designated common land or local nature reserve?	<b>R</b> = Includes or is adjacent <b>A</b> = <50m <b>G</b> = >50m	<p>Ramsar sites) afforded the greatest importance. N.B. A separate process of Habitats Regulations Assessment is also being undertaken, to ensure no significant effects to the internationally designated sites.</p> <ul style="list-style-type: none"> <li>There is no up-to-date dataset showing the location of locally designated Sites of Nature Conservation Importance (SNCIs); however, there are data-sets showing the location of ancient semi-natural woodlands, designated common land and local nature reserves. Many of these sites will be designated SSSI, but where they are not they are likely to be designated as SNCI.</li> <li>Qualitative analysis can also take into account whether a site option intersects with a Biodiversity Opportunity Areas (BOAs). These are the regional priority areas of opportunity for restoration and creation of important habitats. BOAs are quite 'broad brush', but are the best data-set that is available in terms of identifying important areas of 'the wider landscape' outside of designated sites. They should be considered areas of opportunity, rather than constraint.</li> </ul>
Intersects with high quality agricultural land?	<b>R</b> = Grade 2 <b>A</b> = Grade 3 <b>G</b> = Does not intersect Grade 1, 2 or 3	<p><b>Good data</b> is available to inform the appraisal of site options in terms of the degree to which development would represent an <b>efficient use of land</b>.</p> <ul style="list-style-type: none"> <li>In terms of PDL, there will be a need to take note of any uncertainty regarding classification for a particular area of 'PDL'. Some areas of PDL are more 'previously developed' than others.</li> <li>Agricultural land is classified into five grades, with grade one being of the best quality. High quality agricultural land is a finite resource, in that it is difficult if not impossible to replace it.</li> <li>Environmental Stewardship is an agri-environment scheme which provides funding to farmers and other land managers in England who deliver effective environmental management on their land. ES land is likely to be of relatively high biodiversity value and 'well farmed' in general terms.</li> <li>Contamination is assumed to be a 'positive' on the basis that development of contaminated land could lead to remediation of land that would otherwise remain contaminated, posing a risk to human health and the environment (in particular the water environment). N.B. For any given site identified as potentially contaminated,</li> </ul>
Intersects with agricultural land under an Environmental Stewardship Scheme?	<b>R</b> = Organic Entry Level Stewardship or Higher Level Stewardship <b>A</b> = Entry Level Stewardship <b>G</b> = Does not intersect	
Intersects with potentially contaminated land?	<b>A</b> = Not contaminated <b>G</b> = Intersects	
Intersects with a site designated by the Surrey Minerals and Waste Plan?	<b>R</b> = Intersects or adjacent <b>A</b> = <100m <b>G</b> = >100m	

Criteria	'RAG' thresholds	Discussion
Intersects with a utility feature?	<b>A</b> = Intersects <b>G</b> = Does not intersect	<p>more detailed investigations would be required to identify whether contamination is in fact present on the ground.</p> <ul style="list-style-type: none"> <li>It is important to avoid 'sterilising' land that could be required in the future for minerals extraction or for a waste management use.</li> </ul>
Proximity to sensitive groundwater location	<b>R</b> = Located within Source Protection Zone 1 (SPZ 1) AND a principle aquifer <b>A</b> = Located within SPZ 2 (any aquifer) <b>G</b> = All other areas	<p>There is limited potential to be certain that any site option would lead to impacts to groundwater (as issues can generally be resolved at the planning application stage), but it is worthwhile querying the location of site options in relation to SPZs and primary aquifers nonetheless.</p>
Proximity to a Conservation Area?	<b>R</b> = Intersects <b>A</b> = <50m <b>G</b> = >50m	<p><b>Limited data</b> is available to inform the appraisal of site options in terms of potential impacts to <b>heritage</b> assets and the historic environment more generally. English Heritage are of the opinion that proximity of a development to a heritage asset is not a strong indicator of impact, given that the setting of a heritage asset can range from a few metres to a few hundred metres. English heritage would prefer to see potential impacts established through site visits.</p> <ul style="list-style-type: none"> <li>Conservation areas are locations where 'historic character' will be particularly strong. It is recognised that historic character will also vary considerably outside of Conservation Areas; however, no data-set is available to enable this to be taken into account.</li> <li>In terms of listed buildings, it is understood that some are 'listed by English Heritage', whilst others are listed by Waverley Borough Council. It is suggested that both types of listed building should be treated as equally important, in that there is a need to take into account the potential for development to negatively impact the 'setting' of the building.</li> <li>Furthermore, the Council has identified "buildings of local importance". These are less sensitive and hence it is suggested that it is not necessary to instances where development would impact on setting.</li> <li>Archaeological Assets are features that may hold evidence of past human activity worthy of investigation.</li> </ul>
Proximity to a Historic Park or Garden?	<b>R</b> = Intersects <b>A</b> = <50m <b>G</b> = >50m	
Proximity to a Scheduled Monument?	<b>R</b> = Intersects or is adjacent <b>A</b> = <50m <b>G</b> = >50m	
Proximity to a listed building?	<b>R</b> = Intersects or is adjacent <b>A</b> = <50m <b>G</b> = >50m	
Proximity to a building of local importance?	<b>R</b> = Intersects <b>A</b> = Adjacent <b>G</b> = Distant	

Criteria	'RAG' thresholds	Discussion
Proximity to an archaeological asset?	A = Intersects or is adjacent G = Distant	
Proximity to the South Downs National Park?	R = <50m A = 50 – 100m G = >100m	<p><b>Good data</b> is available to inform appraisal of site options in terms of impacts to <b>landscape</b> / landscape character. Points to note about the methodology are as follows:</p> <ul style="list-style-type: none"> <li>The AONB is of national importance.</li> <li>Areas of Great Landscape Value are the key locally designated landscape.</li> <li>Other locally designated landscapes are: Areas of Strategic Visual Importance, Godalming Hillside, the Farnham/Aldershot Strategic Gap and areas designated as 'Historic Landscape'.</li> <li>The NPPF emphasises the 'great importance' of Green Belt; however, there will be a need to review the Green Belt in Waverley. A detailed Green Belt Review has been undertaken with a view to identifying how the sensitivity of the Green Belt varies within the District.</li> </ul> <p>It is also the case that qualitative analysis can be undertaken, drawing on the Landscape study recently completed</p>
Proximity to the Area of Outstanding Natural Beauty (AONB)?	R = Intersects A = <50m G = >50m	
Intersects with an Area of Great Landscape Value (but not the AONB)?	A = Intersects G = Adjacent or distant	
Intersects with other local landscape designation (but not the AONB or AGLV)?	A = Intersects G = Adjacent or distant	
Intersects with the Green Belt?	R = Wholly intersects A = Partially intersects G = Outside	
Proximity to a higher order centre?	R = >1200m A = 600-1200m G = -600m	<p><b>Good data</b> is available to enable appraisal of site options in terms of their potential to contribute positively to the achievement of <b>socio-economic objectives</b>. Specific objectives that are reflected to some extent in the criteria relate to 'access to services and facilities', 'access to public transport', 'encouraging walking/cycling', avoiding exposure to air pollution' and 'supporting regeneration initiatives in areas suffering from relative deprivation'.</p> <p>N.B. Minimising the need to travel long distances, and supporting reduced car</p>
Proximity to a local centre?	R = >1200m A = 600-1200m G = -600m	

Criteria	'RAG' thresholds	Discussion
Proximity to a primary school?	<b>R</b> = >1200m <b>A</b> = 600-1200m <b>G</b> = -600m	<p>dependency, is also a 'plus' from a 'climate change mitigation' perspective. Specific points are as follows:</p> <ul style="list-style-type: none"> <li>It has not been possible to take into account whether development of a site might put strain on community infrastructure locally, nor has it been possible to take account of the potential for development to fund delivery of new community infrastructure.<sup>31</sup></li> <li>Proximity to a bus stop is important, particularly for residents who are less mobile (e.g. the elderly) or do not have access to a car. A traffic free national cycle route runs Guildford to Horsham, via Cranleigh, whilst an on-road route runs from Farnham to Guildford.</li> <li>In terms of PROW, it is not possible to assume that proximity is necessarily a significant 'plus point'; however, it is worthwhile highlighting where development of site option could potentially block a PROW. In practice, it is recognised that it will usually be possible for development to accommodate a PROW.</li> <li>Development in close proximity to an AQMA would likely lead to increased traffic congestion (and therefore air pollution) within the AQMA. Air quality within AQMAs is a public health issue.</li> <li>It is assumed that development in an area of relative deprivation is a 'plus' on the basis that development can bring with it investment that will in turn help to facilitate an increase in prosperity locally / reduce spatial inequalities in terms of relative deprivation.</li> </ul> <p>Other data-sets that might ideally be taken into account, with a view to appraising site options in terms of socio-economic objectives, include:</p> <ul style="list-style-type: none"> <li>Access to major centres of employment.</li> <li>Loss of employment land to non-employment uses</li> <li>Proximity to other facilities, including sports facilities and children's play space.</li> <li>Proximity to accessible natural greenspace.</li> <li>However, this criteria could be of little use given the rural nature of Waverley, and the fact that all of the site options that are to be a focus of appraisal are outside of settlement boundaries.</li> </ul>
Proximity to a secondary school?	<b>R</b> = >1200m <b>A</b> = 600-1200m <b>G</b> = -600m	
Proximity to a GPs/Health centres?	<b>R</b> = >1200m <b>A</b> = 600-1200m <b>G</b> = -600m	
Proximity to a bus stop?	<b>R</b> = > 600m <b>A</b> = 300-600m <b>G</b> = 0-300m	
Proximity to a train station?	<b>R</b> = >1200m <b>A</b> = 600-1200m <b>G</b> = -600m	
Proximity to a national cycle route?	<b>A</b> = 300-600m <b>G</b> = 0-300m	
Intersects with a public right of way (PROW)?	<b>A</b> = Intersects <b>G</b> = Does not intersect	
Proximity to an AQMA?	<b>R</b> = Within or adjacent an AQMA <b>A</b> = <1km from an AQMA <b>G</b> = >1km from an AQMA	

<sup>31</sup> For example, a development of 700 houses is likely to fund a 1fe primary school (210 pupil places). Larger developments are also more likely to be able to integrate low carbon energy infrastructure.

Criteria	‘RAG’ thresholds	Discussion
Is the site within an area that suffers from problems of health deprivation?	<b>R</b> = Site does not intersect with an ‘output area’ that is relatively deprived	
Is the site within an area of employment deprivation?	<b>A</b> = Any of the site intersects with an ‘output area’ that is relatively deprived i.e. in the 20-40% (2 <sup>nd</sup> quintile) most deprived in the district	
Is the site within an area that suffers from problems of overall deprivation?	<b>G</b> = Any of the site intersects with an ‘output area’ that is relatively deprived (i.e. in the 0-20% (1 <sup>st</sup> quintile) most deprived in the district	
The criteria listed above reflect most broad sustainability issues/objectives to some extent, although it is notable that:		
<ul style="list-style-type: none"><li>• There are no criteria that cover ‘water’ related issues (other than flood risk).<ul style="list-style-type: none"><li>– Water resource availability does not vary significantly within the Borough; and whilst water pollution issues (i.e. sensitivities) may vary spatially (including issues associated with the capacity of Waste Water Treatment Works), in the absence of an up-to-date Water Cycle Study there is no mapped data. The presence of a groundwater Source Protection Zone does not represent a major constraint for most (non-polluting) types of development.</li></ul></li><li>• Although there is detailed consideration to minimising the need to travel and supporting reduced car dependency, there are no criteria dedicated to ‘climate change mitigation’.<ul style="list-style-type: none"><li>– Some site options may well have inherently greater potential to incorporate on-site low carbon energy; however, there is insufficient evidence to enable analysis. The potential for development to support building integrated renewables - such as solar PV and solar heating - is not locationally dependent; and whilst terrain / aspect can have some bearing on the potential for solar gain, this is not a clear relationship that can be taken into account.</li></ul></li></ul>		



## Summary appraisal findings

Table B presents summary appraisal findings in relation to the 144 site options. More detailed appraisal findings are available upon request.<sup>32</sup>

**Table B** Summary appraisal findings: Site options

ID	Site Address	flood zone	surface water flood	International biodiversity.	SSSI	Ancient woodland etc.	Agricultural land	Env Stewardship land	Contaminated land	Minerals/waste site	Utility	Groundwater	Conservation area	Historic park	Scheduled monument	Listed building	Locally listed building	Archaeological asset	National Park	AONB	AGLV	Other landscape	Green Belt	Higher tier centre	Local centre	Primary school	Secondary school	GP / health centre	Bus stop	Train station	National cycle route	Public right of way	Air quality area	Health deprivation	Employment deprivation	Overall deprivation
8	Notcutts, Guildford Road																																			
10	Dunsfold Aerodrome/Park																																			
15	Land at Dunsfold Common Road																																			
16	Weyburn Works																																			
25	Land West of Badshot Lea																																			
26	Land at South East Badshot Lea																																			
27	Land to the East of Badshot Lea																																			
29	Coxbridge Farm, Alton Road																																			
30	10 Acre Walk, Clifton Close, Rowledge																																			
52	Thames Water, Borough Road																																			
78	Furze Lane, Farncombe																																			
79	Mills Yard, Bell Road																																			
153	Land at Clumps End, Clumps Road																																			
275	Land adj to Wildwood Golf Club, Horsham Road																																			
276	Land adj to Chilton Close, Alfold Crossways																																			
277	Land adj to Brockhurst Farm, Dunsfold Road																																			
283	Land north west of Ricardo Court																																			

<sup>32</sup> Specifically, a spreadsheet is available that shows the figures underpinning the RAG categorisation.

ID	Site Address	flood zone	surface water flood	international biodiversity.	SSSI	Ancient woodland etc.	Agricultural land	Env Stewardship land	Contaminated land	Minerals/waste site	Utility	Groundwater	Conservation area	Historic park	Scheduled monument	Listed building	Locally listed building	Archaeological asset	National Park	AONB	AGLV	Other landscape	Green Belt	Higher tier centre	Local centre	Primary school	Secondary school	GP / health centre	Bus stop	Train station	National cycle route	Public right of way	Air quality area	Health deprivation	Employment deprivation	Overall deprivation
286	Land north of Queens Mead (west of the A283)																																			
292	West Cranleigh Nurseries, Knowle Lane																																			
294	Land at Horsham Road, Cranleigh																																			
296	Ruffolds Farm, Guildford Road, Cranleigh																																			
299	Land at Shoppe Hill																																			
308	Land to the rear of The Croft																																			
332	Land at Waverley Lane, Farnham																																			
333	Land at 35 Frensham Vale, Lower Bourne																																			
343	Land at Stockwood Way, Hale (Parcel B)																																			
346	Land at Busbridge (south of Chestnut Way)																																			
351	Land adjacent Weydown Hatch, Weydown Road																																			
352	Land at Woolmer Hill, Woolmer Hill Road																																			
364	Land at Moushill Mead, Portsmouth Road																																			
365	Land at Hurst Gate, Portsmouth Road																																			
366	Land west of George Eliot Close,																																			
368	Land at Wheeler Street Nurseries, Wheeler Lane																																			
381	Land south of Badshot Lea																																			
392	Land at Linden Farm, Rosemary Lane																																			
393	Land at Gatesbury, The Meadows																																			
394	Land north of Wyphurst Road																																			
395	Land south and east of Littlemead Ind Estate																																			
398	Land south of Cranleigh Road																																			

ID	Site Address	flood zone	surface water flood	international biodiversity.	SSSI	Ancient woodland etc.	Agricultural land	Env Stewardship land	Contaminated land	Minerals/waste site	Utility	Groundwater	Conservation area	Historic park	Scheduled monument	Listed building	Locally listed building	Archaeological asset	National Park	AONB	AGLV	Other landscape	Green Belt	Higher tier centre	Local centre	Primary school	Secondary school	GP / health centre	Bus stop	Train station	National cycle route	Public right of way	Air quality area	Health deprivation	Employment deprivation	Overall deprivation
399	Land at Backward Point, Cranleigh Road																																			
400	Land to the north of Penlan, Cranleigh Road																																			
402	Land South of Field View Close, Chiddingfold																																			
436	Land at Preymead Ind Estate, Badshot Lea Rd																																			
438	Land west of Green Lane, Badshot Lea																																			
440	Land NE of Holtside, Lickfolds Rd, Rowledge																																			
441	Land at Folly Hill, Upper Hale																																			
443	Land at Franklyn Road																																			
448	Land to the rear of 10 & 11 Busdens Close																																			
449	Land at Manor Lodge																																			
450	Land opposite Milford Golf Club																																			
452	Land at Petworth Road																																			
461	Land behind 48 Wrecclesham Hill, Farnham																																			
464	Land at Frillingshurst Cottage, Prestwick Lane																																			
469	Land south side of Bramley																																			
470	Land at Chilton Close (rear of The Willows)																																			
471	Land rear of Stacey's Farm Cottage, Thursley Rd																																			
472	Alfold Garden Centre																																			
475	Land at St. Georges Road, Badshot Lea																																			
479	SSE Old Frensham Road, Farnham																																			
481	Land adjacent to Turners Mead, Chiddingfold																																			
497	Cranleigh Brickworks, Baynards, Rudgwick																																			

ID	Site Address	flood zone	surface water flood	international biodiversity.	SSSI	Ancient woodland etc.	Agricultural land	Env Stewardship land	Contaminated land	Minerals/waste site	Utility	Groundwater	Conservation area	Historic park	Scheduled monument	Listed building	Locally listed building	Archaeological asset	National Park	AONB	AGLV	Other landscape	Green Belt	Higher tier centre	Local centre	Primary school	Secondary school	GP / health centre	Bus stop	Train station	National cycle route	Public right of way	Air quality area	Health deprivation	Employment deprivation	Overall deprivation
545	Baker & Oates, Gardeners Hill Road, Farnham																																			
546	West of Switchback Lane, Rowledge																																			
557	Brownscombe House and Cottage, Hindhead Rd																																			
558	Ewhurst Brickworks, Horsham Road																																			
561	Land East of Petworth Road and South of Mill Ln																																			
563	Land East of Longdene House, Hedgehog Ln																																			
564	Century Farm, Green Lane, Badshot Lea																																			
568	Land at Redhill House, Tilford Road																																			
570	Land off B3000, Binscombe																																			
571	Land east of Binscombe																																			
572	Land to South West of Binscombe																																			
573	Land off Crondall Lane																																			
574	Land East of Loxwood Road																																			
577	Tanshire Park, Elstead Road, Peperharow																																			
590	1 Tongham Road, Farnham																																			
613	Sunray Farm, West Hill																																			
614	Land west of Loxwood Road																																			
615	Land east of Low Lane																																			
618	Land west of Petworth Road, Witley																																			
620	Land adjacent to Ruffold Farm																																			
621	Land at Little Plonks, Church Hill, Shamley Green																																			
622	The Nursery, Gosden Common																																			

ID	Site Address	flood zone	surface water flood	international biodiversity.	SSSI	Ancient woodland etc.	Agricultural land	Env Stewardship land	Contaminated land	Minerals/waste site	Utility	Groundwater	Conservation area	Historic park	Scheduled monument	Listed building	Locally listed building	Archaeological asset	National Park	AONB	AGLV	Other landscape	Green Belt	Higher tier centre	Local centre	Primary school	Secondary school	GP / health centre	Bus stop	Train station	National cycle route	Public right of way	Air quality area	Health deprivation	Employment deprivation	Overall deprivation
624	Moors Lane																																			
626	Land at Botany Hill, Tilford																																			
628	Kingfisher Farm, Sandy Lane																																			
630	Land along Midhurst Road																																			
632	Land adj Barrow Hills School																																			
633	Land at Cramhurst Lane																																			
635	Land adj to Willow House																																			
636	Land adj Oakwood																																			
637	Land at Clockhouse Lane																																			
638	Land at Combe Bury Cottage																																			
640	Land to the west of Bramley High Street																																			
641	Land at Roe Deer Farm, Portsmouth Road																																			
643	Land at Busdens Lane																																			
644	Land at Cedar House, Byworth Road																																			
651	Land west of Scizdons Climb																																			
652	Land off Chestnut Way																																			
653	Lower Paddock Gardeners Hill Road, Farnham																																			
654	Hill Fields, Gardeners Hill Road, Farnham																																			
655	Wrecclesham Farm, Echo Barn Ln, Farnham																																			
656	Wrecclesham Farm Nursery, Echo Barn Ln																																			
657	Land to the south of Monkton Lane, Farnham																																			
658	Alehouse Field, The Common, Dunsfold																																			

ID	Site Address	flood zone	surface water flood	international biodiversity.	SSSI	Ancient woodland etc.	Agricultural land	Env Stewardship land	Contaminated land	Minerals/waste site	Utility	Groundwater	Conservation area	Historic park	Scheduled monument	Listed building	Locally listed building	Archaeological asset	National Park	AONB	AGLV	Other landscape	Green Belt	Higher tier centre	Local centre	Primary school	Secondary school	GP / health centre	Bus stop	Train station	National cycle route	Public right of way	Air quality area	Health deprivation	Employment deprivation	Overall deprivation
659	Land at Northcote Farm, Shamley Green																																			
661	The Brambles, Mark Way, Godalming																																			
663	Land at Tongham Road, Runfold																																			
664	Land at Oak Tree Lane, Haslemere																																			
665	Land South of Wood Farm, Portsmouth Road																																			
666	Land at Sturt Road, Haslemere																																			
667	Land at Longdene House, Hedgehog Ln, H'mere																																			
671	Land rear of 12 Heathyfields Road, Farnham																																			
672	Land rear of Sandford, Petworth Road, Witley																																			
673	Brethrens Meeting Room, West Street, Farnham																																			
674	Land SE of Haslemere Water Works, Sturt Road																																			
675	Land at Frensham Vale Park																																			
680	Monkton Farm, Monkton Lane																																			
682	West Down, Portsmouth Road, Hindhead																																			
687	Alfold Farm Barn and Alfold Farm Bungalow																																			
688	Land at Bowles Farm, Horsham Road, Cranleigh																																			
689	Land off West Hill and Hill Crest, Elstead																																			
692	W of Sweeters Copse, Loxwood Rd, Alfold C'ways																																			
693	Land at Hale Road, Farnham																																			
694	Smokeyjacks, Horsham Road, Ewhurst																																			
695	Land at Red House Farm, Elstead																																			
696	Land South of Frensham Vale Road																																			



ID	Site Address	flood zone	surface water flood	international biodiversity.	SSSI	Ancient woodland etc.	Agricultural land	Env Stewardship land	Contaminated land	Minerals/waste site	Utility	Groundwater	Conservation area	Historic park	Scheduled monument	Listed building	Locally listed building	Archaeological asset	National Park	AONB	AGLV	Other landscape	Green Belt	Higher tier centre	Local centre	Primary school	Secondary school	GP / health centre	Bus stop	Train station	National cycle route	Public right of way	Air quality area	Health deprivation	Employment deprivation	Overall deprivation
701	Land at Lavender Lane, Farnham																																			
702	Hewitt Copse, Land S of Haslemere Road, Witley																																			
703	Land at Coneycroft, By-Pass Road, Milford																																			
711	Land behind Loxwood Rd, Springbok Estate, Alford																																			
712	Land at Highfold, Horsham Road, Cranleigh																																			
713	Garden Style, Wrecclesham Hill																																			
714	Land north of Haslemere Saw Mills, Sturt Road																																			
716	13 Upper Old Park Lane, Farnham																																			
717	Tilford Garage & Appleton, The Street, Tilford																																			
719	Land at Starcross Farm, Green Lane, Tilford																																			
720	Land S of Quernsmuir, 19 Sands Road, Farnham																																			
723	Land behind Hawthorn Fm, Rowledge																																			
726	Barcroft, Barhatch Road, Cranleigh																																			
727	Land rear of Three Styles Road, Farnham																																			
728	Land South of Brighton Road, Busbridge																																			
761	Land at Little Acres Nursery, Badshot Lea																																			
790	SSE Farnham Depot, Lower Weybourne Ln																																			

## APPENDIX II: INITIAL ALTERNATIVES APPRAISAL

### Introduction

Part 2 of this report explains how 'initial' alternative housing scenarios were developed and then subjected to appraisal prior to the Council developing the alternative housing scenarios that are a focus of consultation and appraisal at the current time. Whilst summary appraisal findings in relation to the initial alternatives are presented in Part 2, the aim of this Appendix is to present detailed appraisal findings.

**It is important to emphasise that it is not the Council's intention that these alternatives should be the focus of consultation at the current time.**

### The initial alternative housing scenarios

Scenario	Completions, SHLAA sites in settlements, permissions & windfalls	Homes on greenfield sites		Homes at Dunsfold Aerodrome	Total Homes	Annual Average
		At the four main settlements	At villages			
1	Farnham - 1,253 Godalming - 940 Cranleigh - 437 Haslemere - 604 Villages - 537 <b>Total - 3,771</b>	Farnham – 1,139 Godalming - 210 Cranleigh - 724 Haslemere - 20 <b>Total – 2,093</b>	530	0	6394	337
2	Farnham - 1,253 Godalming - 940 Cranleigh - 437 Haslemere - 604 Villages - 537 <b>Total - 3,771</b>	Farnham – 1,139 Godalming - 210 Cranleigh - 724 Haslemere - 20 <b>Total – 2,093</b>	675	1,800	8339	439
3	Farnham - 1,253 Godalming - 940 Cranleigh - 437 Haslemere - 604 Villages - 537 <b>Total - 3,771</b>	Farnham - 2660 Godalming - 994 Cranleigh – 1,599 Haslemere - 215 <b>Total – 5,468</b>	675	0	9914	522
4	Farnham - 1,253 Godalming - 940 Cranleigh - 437 Haslemere - 604 Villages - 537 <b>Total - 3,771</b>	Farnham – 1,139 Godalming - 210 Cranleigh - 724 Haslemere - 20 <b>Total – 2,093</b>	675	2,600	9139	481

Notes:

Includes 310 completions from 1/4/12-31/03/13.

Annual average is based on 19 year plan period 2012-31

## Methodology

The methodological approach taken to alternatives appraisal is explained in Part 3, above. To reiterate, within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using red / green shading) and also rank the alternatives in order of preference.

## Appraisal findings

### Appraisal findings: *Initial* alternative housing scenarios

- (1) 6,400 homes focused in and around the four main settlements. No Dunsfold Aerodrome development.
- (2) As (1), but with extra growth directed to villages, and a 1,800 home scheme at Dunsfold Aerodrome. 8,340 homes in total.
- (3) 9,910 homes focused in and around the four main settlements. No Dunsfold Aerodrome development.
- (4) As (2), but with a 2,600 home scheme at Dunsfold Aerodrome. 9,140 homes in total.

Topic	Discussion of <u>significant effects</u> (and <u>relative merits</u> in more general terms)	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
Biodiversity	<p>A key consideration is the potential for impacts to the following internationally important sites: Thames Basin Heaths SPA; Wealden Heaths SPA; and Thursley, Hankley and Frensham Commons SPA. Impacts have been considered through a standalone process of Habitats Regulations Assessment (HRA)<sup>33</sup>, but it is appropriate to recap findings here in addition to considering impacts to 'biodiversity more generally'.</p> <p>The HRA considers the amount of Suitable Alternative Natural Greenspace (SANG) that would be necessitated under each of the scenarios in order to avoid impacts to the Thames Basin Heaths SPA. The principle of using SANG in this way has been established through other plans in the vicinity of this SPA, although in practice the feasibility of extensive SANG provision and adequate ongoing management is uncertain.</p> <p>For the other two SPAs, where the principle of using SANG to avoid visitor pressure is not established, the HRA calculates the expected percentage increase in visitor pressure that would result from each scenario. These sites (as well as the Thames Basin Heaths) are sensitive to visitor pressure given ground-nesting bird species (Nightjar, Woodlark and Dartford warbler).</p> <p>Essentially, it is clear <b>(3)</b> does not perform well in terms of impacts to European sites as it is a high growth scenario that would focus a large amount of growth at Farnham, Godalming and Haslemere – i.e. the settlements that are in close proximity to the SPAs. The scale of growth directed to Farnham would be a particular issue, as there would be a risk of sufficient SANG not being delivered / managed appropriately over time. There could also be a risk of increase in visitor numbers to the other SPAs (and in particular Thursley, Hankley and Frensham Commons) exceeding the commonly agreed 5% threshold whereby a 'significant effect' can be assumed.</p> <p>Given major doubts around SANG provision, and the possibility of significant increases in visitor pressure, it is appropriate to conclude that <b>(3)</b> would lead to <b>significant negative effects</b>. This conclusion is reinforced by the fact that there would also be impacts to 'biodiversity more generally', i.e. impacts to habitat not designated as being of European importance.</p> <p><b>(1)</b> is a low growth scenario, and hence performs well, although it is not thought that opportunities (e.g. around green infrastructure provision) will arise and so it is not appropriate to conclude significant positive effects.</p> <p><b>(2) &amp; (4)</b> perform equally well in terms of impacts to the internationally important sites, given the assumption that a higher quantum of growth at Dunsfold Aerodrome <b>(4)</b> does not significantly increase risk.<sup>34</sup> Leaving aside</p>	★ 1	2	4	3

<sup>33</sup> HRA work – undertaken by URS –focused on the final versions of the housing scenarios (see Part 3 of this report), however there was also some work done in early 2014 relation to the initial scenarios.

<sup>34</sup> There is a degree of uncertainty with regards to this assumption. The HRA notes whilst part of the Dunsfold Aerodrome site lies within 9km of the Thursley, Hankley and Frensham Commons SPA, it should be possible to focus development outside of this zone,

Topic	Discussion of <u>significant effects</u> (and <u>relative merits</u> in more general terms)	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
	HRA considerations, however, it is possible to conclude that <b>(2)</b> - i.e. low growth at Dunsfold Aerodrome - is preferable. Development at here could lead to biodiversity impacts given that two SNCIs intersect the edge of the site, others are located in close proximity and the Chiddingfold Forest SSSI is located 150m away at its nearest point. <b>(4)</b> is not predicted to result in significant negative effects on the assumption that targeted habitat creation and enhancement will be delivered as part of the Dunsfold Aerodrome development.				
Climate change mitigation	<p>A key consideration here relates to the potential for each scenario to increase or decrease average per capita transport-related CO<sub>2</sub> emissions. Waverley residents currently have high average transport related CO<sub>2</sub> emissions given the rural nature of the Borough and resulting high car dependency.</p> <p>Another consideration relates to the potential to support renewable or low carbon energy infrastructure, and hence minimise CO<sub>2</sub> emissions from the built environment. In practice, this means supporting larger scale developments (of at least several hundred homes), as it is only where development is at scale that delivery of the infrastructure becomes viable.</p> <p>It is helpful to firstly give consideration to <b>(4)</b>, which would involve relatively high growth at Dunsfold Aerodrome (2,600 homes). This is an isolated location, and hence a high degree of <u>car dependency / need to travel long distances by car</u> can be expected. This conclusion holds true even once account is taken of: the potential for some people to live and work on-site; the likelihood that a high growth approach will enable delivery of a local centre and an enhanced bus service; the potential to support walking/cycling through design-measures; and the fact that residents of nearby rural communities will be able to make use of new services/facilities/employment opportunities etc.</p> <p>However, in terms of the potential to reduce per capita domestic carbon emissions through putting in place <u>renewable / low carbon energy infrastructure</u>, <b>(4)</b> performs very well. A development at this scale would, it is assumed, easily enable delivery of a combined heat and power station fuelled by biomass, with a network of piping to provide 'district heating'. There are likely to be considerable opportunities for heat/power generation from biomass locally, given demand for woodland management.</p> <p><b>(2)</b> would involve a relatively small-scale scheme at Dunsfold Aerodrome (1,800 homes). It could be argued that such an approach would have the benefit of ensuring fewer residents living within an isolated location; however, on balance it is suggested that a smaller scheme is not desirable from a climate change mitigation perspective. There would be considerably less potential for self-containment, and whilst development at this scale would still enable delivery of renewable / low carbon energy infrastructure, it is fair to assume that any such scheme would be less ambitious in terms of carbon savings. It is also possible to assume that there would be decreased likelihood of achieving ambitious sustainable design and construction measures (i.e. achievement of Code for Sustainable Homes Level 5 or 6).</p> <p><b>(1) &amp; (3)</b> would not involve development at Dunsfold Aerodrome. <b>(1)</b> is preferable to <b>(3)</b> on the basis that: A) there would be less growth overall, and it is the case that Waverley is a relatively rural authority, with high car dependency; and B) there would be less growth at villages (where car dependency is very high). Having said this, it is recognised that <b>(3)</b> could include several strategic sites on the edge of the largest settlements, which might lead to potential for renewable / low carbon energy infrastructure.</p> <p>In conclusion, it is suggested that <b>(1)</b> – low growth, with no development at Dunsfold Aerodrome - performs best. This is despite the fact that there would be the least potential for reducing per capita built environment CO<sub>2</sub></p>	★ 1	3	2	2

with the area within used as greenspace or non-residential development. This may or may not be possible, in practice, under a high growth strategy.

Topic	Discussion of <u>significant effects</u> (and <u>relative merits</u> in more general terms)	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
	emissions. It is suggested that <b>(2)</b> performs least well on the basis that, in addition to directing additional growth to villages (as per 3 and 4), it would involve a relatively small scheme at Dunsfold Aerodrome. There could be the potential for <b>(2)</b> to result in significant negative effects on the baseline (i.e. significant increases to average per capita CO <sub>2</sub> emissions for Waverley residents); however, this is highly uncertain.				
Community and well-being	<p>Key considerations include the potential for each scenario to:</p> <ul style="list-style-type: none"> <li>• Ensure access to community infrastructure and services (with capacity) for new and existing residents;</li> <li>• Contribute towards reductions in socio-economic inequality between communities; and</li> <li>• Support good health amongst those living in the Borough.</li> </ul> <p>Dealing firstly with the effect of development on access to community infrastructure / services, the result of an Infrastructure Providers Consultation conducted by the Council indicates few major constraints. Some issues are highlighted around GP surgery capacity, with the potential for capacity to be breached under <b>(3)</b> at Farnham and under <b>(4)</b> at Dunsfold; however, there would be good potential to mitigate effects, i.e. for development to fund enhanced capacity.<sup>35</sup> It is suggested that this would also be the case for other types of community infrastructure (e.g. 'early years' school places, which are at or near capacity at Farnham, Godalming, Milford and Witley).</p> <p>Although not clearly highlighted through the Infrastructure Providers Consultation, there are also concerns (highlighted by the WBC Development Management team tasked with considering the 'cumulative impacts' of the various speculative housing applications that have been received recently) regarding the potential for large scale growth at Cranleigh (most notable under Scenario 3) to put pressure on infrastructure capacity, including community infrastructure.</p> <p>Whilst Dunsfold Aerodrome is an isolated location, a 2,600 scheme <b>(4)</b> would support a new local centre, which would provide a range of services (albeit there remains uncertainty regarding precisely what can be achieved, given uncertainty around costly infrastructure upgrades that might be necessitated). It is also the case that there would be good potential to support a quality bus service, which will be important to ensure that residents without access to a car are able to access higher order services/facilities etc. in Cranleigh/Godalming/Guildford/Horsham. A 1,800 scheme <b>(2)</b> might not sufficiently 'deliver' in this respect.</p> <p>A related consideration is 'access to services/facilities etc. for rural residents. There are identified issues associated with rural communities in the Borough, and associated with rural communities in neighbouring Horsham District, where there is a poor bus service. A new local centre at Dunsfold Aerodrome – likely to be of a high quality under <b>(4)</b> - could lead to notable benefits.</p> <p>In terms of addressing localised issues of relative <u>deprivation</u>, it is the case that <b>(3)</b> performs best; however, it is not clear that effects would be particularly notable. Areas of relative deprivation are to be found within localities on the outskirts of Farnham and Godalming, and hence (3) may lead to some benefits if it is the case that additional housing means that a major new employer is attracted to the area, or there is an enhancement in the capacity of community infrastructure / service provision locally.</p>	2	2		

<sup>35</sup> The NHS England Local Area Team highlights the following in relation to Dunsfold Aerodrome: "The Dunsfold Park area is serviced by the Cranleigh and Chiddingfold practices. Cranleigh have recently been subject to a new build, integrating community services on site. It is anticipated that Cranleigh can absorb some of these patients. Chiddingfold has a purpose built practice in Chiddingfold and a small branch surgery in Dunsfold with no room for expansion. Patients would have to travel past the site in Dunsfold to access the Chiddingfold site which is more than 8 miles away. If [a high growth approach] was pursued, we do not feel that there would be the capacity at the Dunsfold Branch surgery to take on these patients. Given the close proximity of both Cranleigh and Chiddingfold Surgeries, we would not support a new GP contract in Dunsfold Park, but the two practices in the area could work with WBC to discuss development of new premises."

Topic	Discussion of <u>significant effects</u> (and <u>relative merits</u> in more general terms)	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
	<p>In terms of supporting good health, there are two important considerations. Firstly, there is a need to support and encourage walking/cycling, and secondly there is a need to avoid worsening existing issues of poor air quality in Farnham and Godalming. In terms of the former, it is difficult to be certain regarding the relative merits of the scenarios, however, it could be suggested that <b>(2)</b> and <b>(4)</b> perform well on the basis that a major new development at Dunsfold Aerodrome will enable the potential for well-planned green infrastructure and walking/cycling infrastructure. In terms of the latter, it is safe to assume that <b>(3)</b> is worst performing on the basis that high growth at Farnham will lead to worsened traffic congestion. Traffic at Cranleigh could also become an issue.</p> <p><u>In conclusion</u>, it is suggested that <b>(3)</b> and <b>(4)</b> – i.e. the two scenarios that are at the extremes in terms of the balance of growth at the main settlements vs. Dunsfold Aerodrome – perform better than the two middle ground scenarios, i.e. the scenarios that balance growth between the aerodrome and the main settlements. This conclusion reflects an overriding assumption that focusing growth leads to opportunities for the development sustainable communities, and minimising the adverse effects of growth. It is not suggested that significant effects will result, however.</p> <p>With regards to <b>(1)</b> and <b>(2)</b>, it is not clear which is preferable. A draw-back to (1) is that it is the only scenario that would involve a low growth approach at the villages (where there is a need to support the vitality of village centres). The major draw-back to (2) relates to the assumption that a 1,800 home scheme at Dunsfold Aerodrome would be less than optimal in terms of the infrastructure, including community infrastructure, that can be delivered. It is not clear that either scenario would lead to significant negative effects.</p>				
Economy	<p>An Employment Land Review (ELR) study has recently reported, which indicates demand for additional employment land in the Borough. There is no indication, however, that demand for employment land is driven by / related to the housing growth strategy to any great extent, i.e. there is no indication that opportunities exist to significantly stimulate economic growth locally (e.g. by attracting major new firms to the area) by following a high housing growth strategy across the Borough, or a high growth strategy at any main settlement in particular.</p> <p>A focus of appraisal, therefore, must be on the potential for housing growth strategy to <i>avoid hindering</i> economic growth. In particular, there is a need to appraise the alternatives in terms of their potential to avoid worsening <u>traffic congestion</u> on key routes.</p> <p>The traffic growth / congestion implications of the alternatives have been considered through Strategic Transport Assessment (STA) carried out by Surrey County Council. For each of the alternatives, the STA identifies the increase in 'vehicle kilometres' and 'vehicle hours' (during the AM peak), over and above a 'do minimum' scenario, that can be expected in 2031. There is not a direct relationship, indicating that average speeds of traffic will vary under each of the scenarios.</p> <p>A notable finding, with regards to impacts on average speed, is that <b>(3)</b> – i.e. a high growth strategy (522 dpa) with no growth directed to Dunsfold Aerodrome – performs poorly. It would result in a 2.5% decrease in average speed relative to the situation under a do minimum scenario. By contrast, <b>(4)</b> would lead to a 2% decrease, despite it also involving a relatively high growth approach (481 dpa). Similarly, the STA finds that decreases in average speed under <b>(1)</b> are not significantly less than under <b>(4)</b>, despite (1) involving significantly less growth. Under (1), which would involve 337 dpa, a decrease in average speed of 1.7% (over and above the do minimum scenario) is predicted by 2031. This reflects the fact that (1) would focus growth at the main settlements, with no growth focused at Dunsfold Aerodrome.</p> <p>The analysis shows that there is benefit to following a strategy that focuses growth at Dunsfold Aerodrome in the sense that increased traffic congestion</p>	★1	★1	2	★1



Topic	Discussion of <u>significant effects</u> (and <u>relative merits</u> in more general terms)	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
	<p>around the towns will be avoided and indeed average traffic congestion across the Borough will be minimised (and hence average traffic speed maximised). This is an important consideration from a perspective of wishing to support the local economy. The STA notes that there would be localised traffic impacts around Dunsfold and Cranleigh, but that the wider impact will be relatively low as it is the case that traffic would “disperse across the local highway network quickly”. This is an issue that requires further investigation, i.e. there is the need to investigate the impacts on traffic locally that would result from development at Dunsfold Aerodrome, and the potential to mitigate this through infrastructure upgrades.</p> <p>With regards to the A3 – which is the key trunk road - the STA finds that (3) and (4) would have the greatest impact (unsurprisingly, given that they are the higher growth scenarios), but that impacts would not be likely to be significant given that the A3 in Waverley has capacity.</p> <p>In light of the above discussion, it is clear that <b>(3)</b> performs poorly in terms of traffic congestion across Waverley. Further analysis that supports this conclusion is as follows:</p> <ul style="list-style-type: none"> <li>• Under (3) there would be congestion issues on seven A/B roads in Waverley, as well as one road in a neighbouring authority (the A325 Farnborough Road in Rushmoor Borough).</li> <li>• By comparison, under (1) and (2) there would be congestion issues on six A/B roads in Waverley, and whilst there would still be issues on the A325 Farnborough Road they would not be as pronounced.</li> </ul> <p>This might indicate the potential for significant negative effects; however, it is not considered appropriate to draw this conclusion, on balance. There are other important factors to consider, that have a bearing on economic growth locally. In particular, a major concern of businesses in the M3 LEP area is the high cost of housing and the issues this raises in terms of the recruitment and retention of staff. Growth at Farnham and Godalming could ensure a workforce to support growth at nearby towns.</p> <p>Solely giving consideration to predicted increased congestion / decreased in average traffic speed would suggest that <b>(4)</b> is then second worst performing. (4) performs just as badly as (3) in terms of the number of A/B roads that would see a breach of capacity (seven). With regards to the A325 Farnborough Road in Rushmoor Borough, (4) would see a capacity of 1.12, which compares to 1.15 under (3) and 1.06 under a do minimum scenario. However, there is also one other factor to consider namely that growth at Dunsfold Aerodrome will involve employment development. On this basis, (1), (2) and (4) are predicted to perform on a par.</p>				
Heritage	<p>There is the potential for growth at the main settlements to put pressure on the integrity of historic cores / Conservation Areas, e.g. through increased traffic. This is a key consideration, and on this basis it is suggested that <b>(3)</b> performs poorly, however it is recognised that in practice growth can also bring with it investment in high streets that can support conservation of the historic environment and more general maintenance of historic character.</p> <p>Growth at Dunsfold Aerodrome <b>(2)</b> and <b>(4)</b> is shown to perform relatively well, although it is recognised that there is the potential for impacts to heritage assets. This is particularly the case as there could be pressure placed on the Conservation Areas at nearby Dunsfold and Alfold villages, and the Conservation Area at Bramley to the north, which would be impacted by traffic passing along the A281.</p> <p>Another important consideration relates to the potential for impacts at the villages. On balance, it is appropriate to suggest that growth does have the potential to lead to negative impacts, although again it is recognised that this will often not be the case and indeed in some instances growth at villages can support the vitality/functioning of high streets and in this way lead to heritage benefits. <b>(1)</b> would involve less growth at the villages than the other three scenarios.</p>		2	4	3

Topic	Discussion of <u>significant effects</u> (and <u>relative merits</u> in more general terms)	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
	It is not suggested that any of the scenarios would be likely to lead to <i>significant</i> effects, although it is recognised that there is the possibility of significant negative effects to arise under any scenario if it is the case that nationally important assets are impacts, or historic character associated with a village, town or landscape area eroded to a significant extent.				
Housing	<p>(1) would lead to <b>significant negative effects</b> in terms of this objective on the basis that delivery of 337 new dwellings per annum (dpa) over the plan period would, according to the Strategic Housing Market Assessment (SHMA), fail to ensure that housing needs are addressed. The SHMA finds 'objectively assessed housing need' to necessitate delivery of 470 dpa. The SHMA established this figure subsequent to consideration of housing need across the wider housing market area, which comprises Waverley, Guildford and Woking. This is in-line with the NPPF, which states that authorities should meet <i>"the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with [principles of sustainable development]"</i>.</p> <p>Having said that (1) is worst performing, it is worth noting that the spatial distribution under this scenario does potentially have some merit in that only 18% of new homes would be directed to the south-east of the Borough. There is some evidence to suggest that affordable housing need is greatest to the north and west.</p> <p>(2), at 439dpa, also falls short of the 470dpa figure identified by the SHMA, leading to <b>significant negative effects</b>.</p> <p><b>Scenarios 3</b> (522dpa) and <b>4</b> (481dpa) would lead to <b>significant positive effects</b> on the baseline. Both figures are in excess of the 470dpa 'objectively assessed need' figure identified by the SHMA. The effect would be to reduce the risk of undersupply within the housing market area. In other words, even if it transpires that Woking and/or Guildford choose to follow a low growth approach, in light of constraints, objectively assessed housing need within the housing market area might still be met.</p> <p>It is noted that (4) would involve targeting 40% of new housing to Cranleigh and Dunsfold Aerodrome. By comparison, (3) would involve targeting 20% of new homes here. On this basis, the scenarios are assessed as performing equally well.</p>	3	2	1	1
Landscape	<p>It is helpful to deal firstly with (3), which would involve focusing growth at the main settlements, with no development at Dunsfold Aerodrome. The scale of growth at Farnham, Godalming, Haslemere and Cranleigh would be greater than under other scenarios. There is the likelihood of significant changes to landscape character at each of these settlements:</p> <ul style="list-style-type: none"> <li>• At Haslemere there is the nationally important AONB to consider.</li> <li>• At Farnham there is the potential for landscape impacts given the presence of the AGLV, and more generally the fact that there will be a significant contribution to the urbanisation of the A31 corridor which links Farnham, Aldershot, Farnborough, Camberley and northward to Reading; however, the Landscape Study has found that parts of Farnham are less sensitive in landscape terms with more development potential.</li> <li>• At Godalming there are locally important landscapes (including AGLV to the south).</li> <li>• At Cranleigh, there are fewer obvious strategic considerations, but it is accepted that Cranleigh is a smaller settlement with a 'village feel' that would be put at risk by growth.</li> </ul> <p>Given the above considerations, there is the likelihood of (3) leading to <b>significant negative effects</b> on the landscape baseline.</p> <p>(1) is a low growth scenario, and hence performs well.</p> <p>Differentiating between the merits of (2) and (4) primarily necessitates considering the landscape merits of development at Dunsfold Aerodrome vs.</p>	1	3	4	2

Topic	Discussion of <u>significant effects</u> (and <u>relative merits</u> in more general terms)	Rank of preference			
		Opt 1	Opt 2	Opt 3	Opt 4
	development around the main settlements. It is generally accepted that Dunsfold Aerodrome (a brownfield site) is not a sensitive location, relative to the settlement edges. Whilst the AGLV skirts the site (and intersects to a small extent), the AONB is located 1.2km north-west.				
Soils and other natural resources	<p>A primary consideration here relates to the loss of greenfield, agricultural land to development. In this respect, <b>(3)</b> clearly performs least well. It is appropriate to 'flag' the potential for <b>significant negative effects</b> to result from an approach that would focus high growth on greenfield sites; however, that is not necessarily to suggest that there will be significant loss of 'best and most versatile' agricultural land. There is no grade 1 agricultural land in Waverley and only pockets of grade 2 land.</p> <p><b>(1)</b> is a lower growth approach and hence performs well. <b>(2)</b> and <b>(4)</b> perform equally well on the basis that Dunsfold Aerodrome is a brownfield site.</p>	★ 1	2	3	2
Water, flood risk and other climate change adaptation issues	<p>A key consideration relates to water treatment infrastructure, i.e. the potential to locate growth in such a way as to ensure that capacity is not at risk of being breached (which can result in water pollution incidents).</p> <p>It is not clear that flood risk is a strategic issue locally, i.e. an issue that should drive consideration of alternative housing scenarios. Nor is it suggested that water use / efficiency considerations have a bearing on this appraisal.</p> <p>Both Southern Water and Thames Water have already been contacted with regards to the alternative housing scenarios.</p> <p>SW are of the view that <i>"Wastewater capacity should not be seen as a constraint to development... Necessary investment in strategic infrastructure can be delivered in parallel with development... The Local Plan should contain a general policy to co-ordinate the timing of development with the provision of infrastructure... We also look to the Local Plan to prevent development close to wastewater treatment facilities and not contain policies that would unduly restrict the delivery of essential infrastructure."</i></p> <p>TW go slightly further, highlighting that -</p> <ul style="list-style-type: none"> <li>In Farnham there are local capacity constraints in the sewerage network, but it is difficult to accurately identify the infrastructure upgrades needed at this stage.</li> <li>In Cranleigh/Dunsfold/Ewhurst/Hascombe/Rowly/Ewhurst Green/Alfold there are concerns about waste water services at Cranleigh Sewage Treatment Works (STW) and existing sewage treatment capacity is unlikely to be able to support anticipated demand.</li> </ul> <p>TW do not suggest that there will be any absolute constraints to growth, however, stating that: "In the event of an upgrade to TW assets being required, up to three years lead in time will be necessary." On this basis, it is not appropriate to distinguish between the merits of the alternatives. Water infrastructure upgrades are likely to be feasible, although whether they are viable is another question.</p> <p>N.B. TW has also commented on water supply, stating that: <i>"The supply area is a discrete zone and there are very limited options to bring water in from other areas. Based upon the information provided, TW do not anticipate any show-stoppers regarding water supply. However, more information on the phasing and timescales of the developments will allow us to understand whether the proposed level of growth has been accommodated for within the water resources management plan."</i></p>	N/a	N/a	N/a	N/a

### Summary findings

- (1) 6,400 homes focused in and around the four main settlements. No Dunsfold Aerodrome development.  
 (2) As (1), but with extra growth directed to villages, and a 1,800 home scheme at Dunsfold Aerodrome. 8,340 homes in total.  
 (3) 9,900 homes focused in and around the four main settlements. No Dunsfold Aerodrome development.  
 (4) As (2), but with a 2,600 home scheme at Dunsfold Aerodrome. 9,140 homes in total.

Topic	Rank of preference			
	Opt 1	Opt 2	Opt 3	Opt 4
Biodiversity	1	2	4	3
Climate change mitigation	1	3	2	2
Community and well-being	2	2	1	1
Economy	1	1	2	1
Heritage	1	2	4	3
Housing	3	2	1	1
Landscape	1	3	4	2
Soils and other natural resources	1	2	3	2
Water, flood risk and other climate change adaptation	N/a	N/a	N/a	N/a

### Summary and conclusions

- Starting with **biodiversity**, (1) is best performing primarily on the basis that it is a low growth approach. (3) would lead to **significant negative effects** as it is a high growth approach, and growth would be directed to the main settlements, which are in close proximity to European designated sites. There may be the potential to mitigate effects (through delivery of SANG) although at this scale of growth delivery is highly uncertain.
- With regard to **climate change mitigation**, the suggestion is that a low growth approach (1) is best performing given that Waverley is a relatively rural borough with high car dependency. It is suggested that focusing growth at Dunsfold Aerodrome (4) also performs well as there would be the potential to design-in low carbon energy infrastructure and achieve high energy efficiency standards. A downside to focusing growth at Dunsfold Aerodrome however (and the reason why option 4 is assumed to perform as well as option 3) is that residents would likely be highly dependent on the private car / would need to make long journeys by car (e.g. for employment).
- In terms of **'Community and well-being'** it is suggested that a high growth approach is best performing, and that growth should be concentrated, whether that be at Dunsfold Aerodrome or around the main settlements.
- The discussion under the **'Economy'** heading focuses to a large extent on traffic congestion issues. It is the case that focusing growth at Dunsfold Aerodrome could help to avoid worsened traffic congestion around the main settlements, although there would obviously be more localised issues (plus there is a

Topic	Rank of preference			
	Opt 1	Opt 2	Opt 3	Opt 4
<p>need to factor-in uncertainty around capacity upgrades). Another important issue, which serves to highlight the merit of focusing growth at main settlements, is the need to deliver housing at locations where businesses wish to locate, which means delivering housing at the main settlements (particularly in the west of the Borough).</p> <ul style="list-style-type: none"> <li>• In terms of <b>Heritage</b>, it is suggested that a low growth approach is best performing. If a high growth approach were to be pursued, then it is suggested that it would be preferable to focus growth at Dunsfold Park (as opposed to at the main settlements). It is recognised, however, that growth at Dunsfold Aerodrome would also lead to some impacts to Conservation Areas at nearby villages.</li> <li>• In terms of housing, (1) would lead to <b>significant negative effects</b> on the basis that objectively assessed housing needs (OAHN) would not be met. (2) would also fall short of the OAHN figure, which is 470 dpa. (3) and (4) would exceed the OAHN figure, and hence are predicted to result in <b>significant positive effects</b>.</li> <li>• <b>Landscape</b> is a key consideration locally given the sensitivities that exist. (3) would lead to <b>significant negative effects</b>. Locally important landscapes would certainly be impacted, there would be an erosion of the historic settlement pattern in the Borough's north and west and the 'vilage feel' of Cranleigh would be lost. (1) performs best on the basis that it is a low growth approach. (4) performs second best on the basis that Dunsfold Aerodrome is relatively unconstrained.</li> <li>• <b>'Soil and other natural resources'</b> is perhaps a less fundamental consideration, but it is obviously the case that (3) would lead to <b>significant negative effects</b> as a high growth approach would be followed, with growth focused on greenfield land. (1) is a low growth approach and hence performs well. Focusing growth at Dunsfold Aerodrome also performs well, as this is largely a previously developed site.</li> <li>• <b>Water / flood</b> risk issues are not a relevant in that it is likely that effects can be avoided / minimised under any scenario.</li> </ul> <p>The appraisal shows that a low growth approach performs well in terms of a number of environmental objectives, but poorly in terms of 'community and well-being' and 'housing'. It is <i>not</i> suggested that a low growth approach would result in significant opportunities missed in terms of 'economy' related objectives, although the need for housing to support employment growth in the sub-region is a consideration. Indeed it is suggested that low growth could perform well in terms of economic objectives as the effect would be to minimise increases in traffic congestion. If a high growth approach were to be followed – i.e. an approach that involves delivering housing at a level above the objectively assessed need figure – and growth were to be focused around the main settlements, there would likely be significant negative effects in terms of landscape and also biodiversity (on the assumption that sufficient mitigation through delivery of SANG would be difficult to achieve). Traffic congestion around the main settlements and on major routes would also be problematic.</p>				