

# **Sustainability Appraisal (SA) of the Guildford Borough Local Plan**

## **SA Report Addendum**

September 2018

N.B. Garlick's Arch can be seen in **Figure 5.3**, as a blue site with a red outline, indicating that it is both a 'submission allocation' and an 'additional housing site option'.

5.3.25 Finally, there is need to consider the **remaining omission sites**, as understood from Appendix C of the Land Availability Assessment (LAA; see pages 531 to 547). A large number of omission (or 'discounted') sites are listed in the LAA; however, the great majority can be ruled-out immediately, for clear and unambiguous reasons, including -

- all of the sites identified by the LAA as "Not identified [as a potential development area, PDA] in the Green Belt and Countryside Study [GBCS]"; and
- eight sites that, whilst identified as PDAs by the GBCS, are not being actively promoted for residential uses (which immediately calls into question their ability to deliver housing within the early part of the plan period).<sup>17</sup>

5.3.26 The remaining 16 sites are considered within **Box 5.2**, with supplementary information provided in **Box 5.3** (also note methodological discussion in Box 5.1, above). The sites are all shown as 'additional housing site options' in **Figure 5.2**.

*Box 5.2: Green Belt site options around villages (note methodological discussion in Box 5.1, above)*

As discussed above, there is a need to examine 16 village Green Belt omission sites in detail, with a view to identifying which should be taken forward for further examination (**Section 5.4**).

Sites are considered on a village-by-village basis, recognising that there is a desire to avoid geographical clustering of sites, which in turn serves to imply a need to take forward no more than one site per village.

#### **Chilworth**

There is one site - Land at Hornhatch Farm (80 homes) - which performs well relative to other village Green Belt sites discussed here. The potential for allocating the site was given close consideration as part of SA work completed in 2017, as reported within the SA Report Update (2017), and it was similarly identified that it should be examined further through additional housing scenarios. The site is being actively promoted, and could deliver in full within the first five years. It is considered further below, within **Section 5.4**.

#### **Fairlands**

There are two sites - Land to the west of Fairlands (270 homes); and Land at Hook Farm and Hunts Farm, Fairlands (225 homes) - of which one is considered sequentially less preferable. Specifically, the southern site is less preferable as access is proposed to be achieved from the east, which would involve crossing an area of common land, which in turn would necessitate a legal process giving rise to a risk of unforeseen delays to delivery.

The sequentially preferable site - Land to the west of Fairlands - consists of two PDAs identified in the GBCS, and is too large in its entirety (550 homes); however, discussions with the site promoter have served to confirm that there is the potential to deliver a smaller site, whilst still making use of strong, defensible Green Belt boundaries. A smaller 270 home site (one rather than two of the GBCS PDAs) has been identified that could deliver in full within the first five years. It is considered further below, within **Section 5.4**.

#### **Flexford**

There are four omission sites, of which one can be ruled-out immediately as sequentially least preferable. This is Land to east of The Paddocks (50 homes), which encompasses an SNCI. This was removed from the 2016 Proposed Submission Plan on the basis of a re-survey of the SNCI.

<sup>17</sup> Land to the south of West Horsley (being proposed for a relocated Raleigh School); Land to the east of Shere Road, West Horsley (not promoted through Reg 19); Land to the north east of Effingham (has planning permission); Land West of Ripley, Portsmouth Road, Ripley (not promoted through Reg 19); Land to the south east of Hunts Hill Farm, north of Normandy (not promoted through Reg 19); Greater expansion of Send (south west) (half the site is being promoted for employment uses); Greater expansion of Send (north) (only part being actively promoted, with the promoted sites discussed below as the two sites north and south of Tannery Lane); Papercourt Plot 'A' B D and E, Polesden Lane, Send (not promoted through Reg 19); and Land around Burnt Common warehouse, London Road, Send (allocated for industrial uses).

Of the remaining three, one can be identified as sequentially least preferable. This is Land to the south of Normandy and north of Flexford (280 homes), which comprises the southern part of a previously much larger site (namely that part which stands-out as benefiting from proximity to Wanborough railway station), that was a proposed strategic allocation in the 2016 Proposed Submission Plan. The site benefits from its proximity to the rail station; however, a primary issue with the site is that it is too large, and has no potential to be made smaller whilst making use of strong, defensible Green Belt boundaries. It would introduce a very different built form to Flexford, and would have a greater visual impact than the other sites discussed below. It is also the case that, as a larger site, there could be an element of delivery risk, noting that the sequential approach to spatial strategy would necessitate that any allocation at Flexford would need to be in addition to allocation of one of the three Tier 8 sites discussed above, which are all similarly large sites.

Of the two more preferable sites, on balance one can be identified as overall sequentially preferable, namely Land east of Glaziers Lane (105 homes). The potential for allocating the site was given close consideration as part of SA work completed in 2017, as reported within the SA Report Update (2017), and it was similarly identified that it should be examined further through additional housing scenarios. Relative to the other site (Land between Beech Lane and Westwood Lane; 100 homes) Land east of Glaziers Lane benefits from better proximity to the train station (it is almost adjacent). This is considered to be an overriding consideration, albeit the site would be visible from the railway station and Glaziers Lane, and is less preferable in Green Belt terms (the GBCS identifies the PDA within which Land East of Glaziers Lane falls as comprising 'red-rated' Green Belt, whilst Land between Beech Lane and Westwood Lane falls within an 'amber-rated' PDA). Land east of Glaziers Lane is considered further in **Section 5.4**.

### Normandy

Both omission sites - Land at north Wyke Farm (65 homes);<sup>18</sup> and Rear of Alfriston House, Guildford Road (10 homes) - perform relatively poorly on the basis that they are located at either end of Normandy, which is a small dispersed settlement (albeit with a primary school (adjacent to the Wyke Farm site) and GP surgery.<sup>19</sup> There is a regular bus service to Guildford/Aldershot, but the settlement does not benefit from a train station, unlike nearby Flexford. Also, Normandy is relatively close to the TBHSPA, albeit neither site is within 400m, such that there would be potential for effective avoidance/mitigation through SANG delivery.

### Send / Send Marsh

There are four omission sites in total, with two located close to one another to the west (Send), and the other two close to one another to the east (Send Marsh).

One of these sites can be ruled-out as sequentially least preferable. This is Land north of Tannery Lane (100 homes), which is in close proximity to the River Wey Navigation Conservation Area. The other sites (Land South of Tannery Lane, Send, 50 homes; Land at Polesdon Lane and Send Marsh Road, 50 homes; and Land at Alderton's Farm, Send Marsh Road, 120 homes) are more challenging to differentiate. All are considered further in **Section 5.4**.

### Shalford

There is one site - Land to the east of Shalford, Chinthurst Lane (175 homes) - which performs poorly relative to other village Green Belt sites discussed here. Whilst the site is within walking distance of Shalford railway station, and comprises 'amber-rated' Green Belt, it falls within the locally designated Area of Greater Landscape Value (AGLV) and the access road is considered unsuitable for this scale of development.

### West Horsley

Of the two omission sites, one can be ruled-out immediately as less preferable, namely Land to the south of West Horsley, Shere Road (55 homes). This site would represent an illogical extension to the settlement in built form terms, extending what is already a linear settlement beyond the logical barrier of the A246.

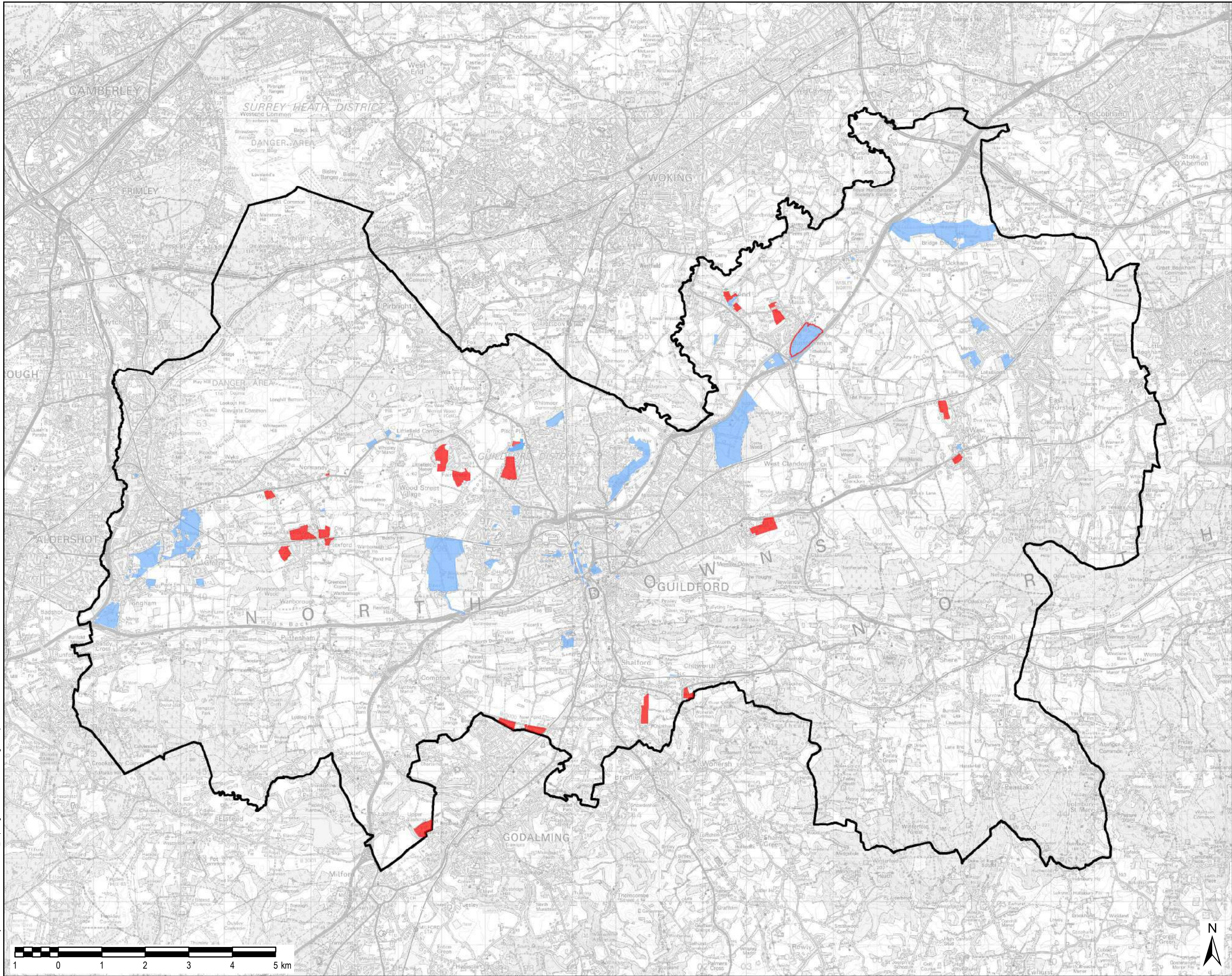
The remaining site - Land off Ripley Lane, Ripley Lane (185 homes) - performs better in built form terms, but is still problematic, in this respect, noting that the scheme would need to front onto Ripley Lane, which is an unmarked rural lane. It is also the case that there are limited services/facilities in West Horsley, with those in East Horsley (also Horsley Station) over 2km distant.

<sup>18</sup> An appeal for 78 units was dismissed on 16 August 2016, and the site has not since been promoted through the Local Plan process.

<sup>19</sup> N.B. the Glaziers Lane site at Flexford is as close to the GP surgery as the Wyke Farm site at Normandy.



File Name: Z:\Projects\Guildford SA 6053703502\_Maps\Figure 1 - Additional Housing Site Options.mxd



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

- LEGEND**
- Guildford Boundary
  - Additional Housing Site Options
  - Submission allocations (2017; N.B. not all housing)

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Purpose of Issue  
**FINAL**

Client  
**GUILDFORD BOROUGH COUNCIL**

Project Title  
**GUILDFORD  
LOCAL PLAN SA**

Drawing Title  
**ADDITIONAL HOUSING  
SITE OPTIONS**

Drawn SM	Checked MF	Approved MF	Date 06/09/2018
AECOM Internal Project No. 60537035		Scale @ A3 1:80,000	

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Drawing Number <b>FIGURE 5.2</b>	Rev
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## 5.4 Establishing the reasonable alternative additional housing scenarios

### Introduction

- 5.4.1 The discussion above leads to the identification of a number of sites that potentially warrant further examination through the appraisal of additional housing scenarios. The aim of this section is to consider different ways that the site options might be ‘packaged-up’ into scenarios.

### Scenarios involving maximum accordance with the spatial strategy

- 5.4.2 As a first port of call, there is a need to consider scenarios that would involve maximum accordance with the spatial strategy, which in practice means scenarios involving allocation of two of the three Tier 8 sites, with no need to place any reliance on Tier 10 sites.<sup>20</sup>
- 5.4.3 There are three combinations of two sites, and on balance it is considered that all three should be taken forward for examination as scenarios - see additional housing **Scenarios 1, 2 and 7** within Table 5.1, below.
- 5.4.4 The scenario involving the two larger sites - namely Clandon Golf and Liddington Hall - would involve providing for more homes than necessary (650 in the first five years, i.e. 100 too many); however, this scenario warrants appraisal nonetheless, recognising the sites in question benefit from being extensions to the Borough’s main settlement, namely Guildford.

### Scenarios necessitating village Green Belt sites

- 5.4.5 It is considered appropriate to also examine scenarios that would involve just one of the Tier 8 sites, delivered in combination with one or more Tier 10 sites. There is a deliverability argument for examining such scenarios, as scenarios 1, 2 and 7 discussed above all rely on a small number of larger sites, such that they are associated with a degree of delivery risk.
- 5.4.6 As discussed within Section 5.3, there are 16 village Green Belt omission sites feasibly in contention, but the majority can be ruled out as sequentially less preferable (noting that there is only a need to identify village Green Belt sites with a combined capacity of up to 300 homes). Sites are ruled out after having taken into account: constraints / site suitability (in comparison to one another, or in comparison to competing sites at the same settlement); settlement suitability; and delivery risk (taking account of geographical clustering). The outcome is the identification of the following sites as having greater potential -
- Land at Hornhatch Farm, Chilworth (80 homes)
  - Land to the west of Fairlands (270 homes; or reduced to 200)
  - Land east of Glaziers Lane, Flexford (105 homes)
  - Land South of Tannery Lane, Send (50 homes)
  - Land at Polesdon Lane and Send Marsh Road (50 homes)
  - Land at Alderton’s Farm, Send Marsh Road (120 homes)
- 5.4.7 There are three further considerations.

<sup>20</sup> Allocating all three is unreasonable as it would involve providing for 850 additional homes in the first five years, once account is also taken of the additional 50 homes to be delivered at Garlick’s Arch (a constant across all scenarios).

*Box 5.3: The Council's summary reasons for ruling-out certain sites prior to examination of scenarios*

In order to understand the 'outline reasons' for arriving at the reasonable additional housing scenarios there is a need to read Chapter 5 ('Selecting the reasonable alternatives') as a whole. As discussed, scenarios are arrived at following 'top down' and 'bottom up' consideration of issues and options.

However, it is recognised that the 'outline reasons' presented within Sections 5.3 and 5.4 will be of particular interest to many stakeholders, namely the reasons for ruling out specific site options despite these sites being actively promoted and having been identified as a PDA by the GBCS.

The analysis presented within Sections 5.3 and 5.4 is considered suitably proportionate (see Box 5.1); however, it is helpful to present further summary information here. The following table presents the Council's summary reasons for each of the sites in question -

Land north of Keens Lane, Guildford (50 homes)	The remainder of the PDA would need to be released from the Green Belt and left undeveloped, leading to inefficient release.
Land at New Pond Road, Farncombe (130 homes)	Wholly within the AONB.
Pond Farm, Furze Lane, Farncombe (90 homes)	
Land to the west of Fairlands (270 homes)	Would need to deliver in combination with one of the larger Tier 8 sites, leading to a heavy reliance on two sites to deliver the 550 home target; and the resulting scenario is sequentially less preferable to other scenarios involving a similar delivery risk (namely the scenarios involving two Tier 8 sites). In other words, scenarios involving a larger site at a village are not favoured, on delivery and settlement hierarchy grounds.
Land at Hook Farm and Hunts Farm, Fairlands (225 homes)	Access problems (with implications for delivery risk) and delivery risk (as per the site above).
Land to east of the Paddocks, Flexford (50 homes)	Comprises an SNCI.
Land south of Normandy / north of Flexford (280 homes)	Sequentially less preferable to an alternative site at Flexford (East of Glaziers Lane), noting delivery risk (as per the Fairland's sites, discussed above) and visual impact.
Land between Beech Lane and Westwood Lane, Flexford (100 homes)	Sequentially less preferable to an alternative site at Flexford, noting relative distance to Wanborough train station.
Land at north Wyke Farm, Normandy (65 homes)	Normandy is a small, dispersed rural settlement, less suited to growth than other villages; and Normandy is close to Flexford, where there is a sequentially preferable site that benefits from proximity to Wanborough train station.
Rear of Alfriston House, Guildford Road, Normandy (10 homes)	
Land North of Tannery Lane, Send (100 homes)	Would impact on the setting of the River Wey Conservation Area; also adjacent to a submission allocation.
Land South of Tannery Lane, Send (50 homes)	Adjacent to submission allocation; and sequentially less preferable to alternative nearby sites at Send Marsh.
Land to the east of Shalford, Chinthurst (175 homes)	Wholly within the AGLV; access road not suitable for development of this scale.
Land to the south of West Horsley, Shere Road (55 homes)	Built form / visual impacts; access to services/facilities.
Land off Ripley Lane, Ripley Lane, West Horsley (homes)	

Table 5.1: The (reasonable) additional housing scenarios

		Option 1 Clandon Golf Aaron's Hill	Option 2 Lidd'ton Hall Aaron's Hill	Option 3 Aaron's Hill Small sites	Option 4 Clandon Golf Small sites	Option 5 Lidd'ton Hall Small sites	Option 6 Aaron's Hill Small sites +	Option 7 Clandon Golf Lidd'ton Hall
<b>Constant</b>								
	Garlick's Arch*	50	50	50	50	50	50	50
<b>Variables</b>								
<b>Tier 8</b>	Clandon Golf, Guildford	300			300			300
	Liddington Hall, Guildford		300			300		300
	Aaron's Hill, Farncombe	200	200	200			200	
<b>Tier 10</b>	Land at Polesdon Lane & Send Marsh Road, Send Marsh				50	50	50	
	Land at Hornhatch Farm, New Road, Chilworth			80	80	80	80	
	Land east of Glaziers Lane, Flexford			105	105	105	105	
	Land at Alderton's Farm, Send Marsh Road, Send Marsh			120			120	
<b>Total additional homes (yrs 1 to 5)*</b>		<b>550</b>	<b>550</b>	<b>555</b>	<b>585</b>	<b>585</b>	<b>605</b>	<b>650</b>
<b>% over 550 home target</b>		<b>-</b>	<b>-</b>	<b>1%</b>	<b>6%</b>	<b>6%</b>	<b>10%</b>	<b>18%</b>

\* There is a need to reiterate two points. Firstly, these homes would be in addition to the land supply supported by the submission plan. Secondly, a further 100 additional homes are proposed at Garlick's Arch, but would be delivered in year 6.

## **7 DEVELOPING THE PREFERRED APPROACH**

### **7.1 Introduction**

- 7.1.1 The aim of this Chapter is to present the Council's response to the alternatives appraisal, i.e. the Council's 'outline reasons' for selecting its preferred approach (to additional housing allocations) in-light of alternatives.

### **7.2 The Council's outline reasons**

- 7.2.1 The following text was provided by the Council -

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

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

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

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

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

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



## 9 APPRAISAL OF PROPOSED MAIN MODIFICATIONS

### 9.1 Introduction

- 9.1.1 This section presents an appraisal of the ‘screened-in’ proposed modifications. Also, consideration is given to the effects of ‘the submitted plans plus proposed modifications’.
- 9.1.2 The appraisal is presented below under 17 topic headings (‘the SA framework’), with each topic-specific narrative split using three sub-headings.

### 9.2 Biodiversity

#### Proposed modifications

- 9.2.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, additional allocation of Aaron’s Hill, Godalming (200 homes) gives rise to a degree of concern due to the proximity of designated habitats, and in particular the Wealden Heath Special Protection Area (SPA); however, there is confidence in the ability to suitably avoid or mitigate impacts. Recent discussions have confirmed that the land-owner will make a nearby field available for a large (16.7 ha) Suitable Alternative Natural Greenspace (SANG). See further discussion of the SANG proposals/issues within Appendix I.
- 9.2.2 With regards to the three proposed additional smaller village extensions there are fewer concerns, although Alderton’s Farm, Send (120 homes) is notable for being within 400m of Papercourt Site of Special Scientific Interest (SSSI). **Also, Glaziers Lane, Flexford (105 homes) is within c.2km of the Thames Basin Heaths Special Protection Area (TBHSPA); however, there is sufficient SANG capacity at Russell Place Farm, to the west of Guildford.**
- 9.2.3 Finally, there is a need to consider the proposal to deliver an additional 150 homes within the Garlick’s Arch submission allocation (which is not a focus of discussion within Chapter 6 / Appendix I). The site includes two small patches of ancient woodland, and also a stream that forms part of the River Wey BOA; however, there is little reason to suggest that the area of green infrastructure delivered within the site will be reduced as a result of the proposal to deliver an additional 150 homes.
- 9.2.4 With regards to proposed site specific policy to guide delivery of the additional supply -
- **MM36** proposes a policy for Aaron’s Hill (A61), which requires a comprehensive approach to avoiding impacts to the SPA, and also requires: *“Comprehensive masterplanning of the site to ensure that development is successfully integrated with the adjoining development site within Waverley borough and the surrounding landscape context.”* The latter requirement could have positive implications for green infrastructure delivery.
  - **MM38** proposes modifications to the submission policy for Garlick’s Arch (A43), with the following additional policy requirement of note: *“Increased landscaped buffer/strategic planting with frontage development set back from the A3 with significant additional measures to mitigate the visual impact of development in this location.”* The increased land-take needed to deliver this landscaping, in combination with the additional 150 homes, could *feasibly* lead to increased pressure on the ancient woodland within the site.
  - **MM44, MM45 and MM46** propose policies for the other three proposed additional allocations, with no requirements proposed in respect of biodiversity, other than that any Alderton’s Farm scheme must avoid “unacceptable impact on trees and hedgerows”.
- 9.2.5 The following other proposed modifications have notable biodiversity implications -
- **MM12** (Policy P5: Thames Basin Heaths Special Protection Area) - clarifies that the requirement is to agree SANG provision *in consultation with* Natural England.

9.5.2 The following other proposed modifications have notable implications -

- **MM3** (Policy S3: Delivery of development and regeneration within Guildford Town Centre) - does not have an explicit focus on developing the economy/employment potential of the town centre, but is supportive of mixed-use developments, and more generally should provide a helpful framework to guide future planning within this key location.
- **MM14** (Policy E2: Location for new employment floorspace) - seeks to add a degree of flexibility, and in doing so support timely delivery of new employment development.
- **MM15** (Policy E3: Maintaining employment capacity and improving employment floorspace) deletes Guildford town centre from the list of Strategic Employment Sites; and supports the provision of ancillary uses *“that complement and positively enhance the functioning of the employment area will be supported.”*
- **MM16** (Policy E4: Surrey Research Park) - seeks to add a degree of flexibility, by removing the requirement for employment uses to be “science-related”. In practice, it is not considered that this leads to any risk of the Research Park’s science focused being diluted over time, recognising that the University is the land-owner.
- **MM39** (Policy A58: Land around Burnt Common warehouse, London Road, Send) - increases the quantum of new employment land to be delivered from 7,000 m<sup>2</sup> to 14,800m<sup>2</sup>. Furthermore, the supporting text explains that:

*“An initial masterplan for the site has shown that it has a total capacity for more than 14,800 sq m. However, the ELNA anticipates that approximately this amount will be required over the Plan period to 2034 to meet identified needs. The ELNA will be updated every three years and if updates show a higher need for industrial class floorspace, this site would be able to provide a larger amount either within or after the Plan period.”*

#### The submission plan plus proposed modifications

9.5.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

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

9.5.4 This conclusion broadly holds true for the submission plan plus proposed modifications, and if anything the effect of proposed modifications may be marginally beneficial, with employment policies E2-E3 now proposed to be slightly less restrictive, in terms of both the sequential approach to directing development to preferred locations and in allowing existing users more scope for expansion. The deletion of Guildford town centre from the list of Strategic Employment Sites in policy E1 to provide greater flexibility for mixed use redevelopment is of note; however, there are no concerns regarding the potential for the town centre to continue to thrive as an employment location, in particular given new proposed Policy S3.

## 9.6 Flooding

### Proposed modifications

9.6.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). **In short, there are limited implications, with the proposed additional village extension allocation at Glaziers Lane, Flexford (105 homes) most notable, in that there is a degree of surface water flood risk at the site’s eastern extent.**



The submission plan plus proposed modifications

- 9.13.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

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

- 9.13.4 This conclusion broadly holds true for the submission plan plus proposed modifications, albeit the effect of proposed modifications is negative, recognising that the proposed additional allocations are all greenfield.

## 9.14 Rural economy

Proposed modifications

- 9.14.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, there are limited implications. The three proposed village extension sites (also the proposal to deliver an additional 150 homes at the submission Garlick’s Arch site) might potentially contribute to the rural economy to some extent, with Flexford being notably the smallest and most rural of the villages proposed to receive additional growth; however, it is difficult to identify any particular opportunities. There are no existing facilities in Flexford, and so it is not possible to argue that development would help to secure the long term future of village facilities, and hence contribute to village vitality in this way.

- 9.14.2 The only other proposed modification with notable implications is **MM17** (Policy E5: Rural economy), which adds ‘open space’ to the list of services and community facilities that should be retained and developed, in order to support the rural economy.

The submission plan plus proposed modifications

- 9.14.3 The SA Report Update (2017) concluded the following in relation to the submission plan -

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

- 9.14.4 This conclusion broadly holds true for the submission plan plus proposed modifications.

## 9.15 Safety and security

Proposed modifications

- 9.15.1 **MM2** deals with proposed modifications to the spatial strategy (Policy S2), which have already been discussed above (Chapter 6 and Appendix I; see discussion of Option 3). In short, there are limited implications. The proposed additional homes will be delivered as part of new communities, rather than as part of urban regeneration schemes. Whilst it is fair to say that new communities will enhance the vitality of adjacent/nearby communities, it is not possible to draw conclusions in relation to safety/security.

- 9.15.2 No other proposed modifications have implications for the poverty and social inclusion.

*The (reasonable) additional housing scenarios*

		Option 1 Clandon Golf Aaron's Hill	Option 2 Lidd'ton Hall Aaron's Hill	Option 3 Aaron's Hill Small sites	Option 4 Clandon Golf Small sites	Option 5 Lidd'ton Hall Small sites	Option 6 Aaron's Hill Small sites +	Option 7 Clandon Golf Lidd'ton Hall
<b>Constant</b>								
	Garlick's Arch*	50	50	50	50	50	50	50
<b>Variables</b>								
Tier 8	Clandon Golf, Guildford	300			300			300
	Liddington Hall, Guildford		300			300		300
	Aaron's Hill, Farncombe	200	200	200			200	
Tier 10	Land at Polesdon Lane & Send Marsh Road, Send Marsh				50	50	50	
	Land at Hornhatch Farm, New Road, Chilworth			80	80	80	80	
	Land east of Glaziers Lane, Flexford			105	105	105	105	
	Land at Alderton's Farm, Send Marsh Road, Send Marsh			120			120	
<b>Total additional homes (yrs 1 to 5)*</b>		<b>550</b>	<b>550</b>	<b>555</b>	<b>585</b>	<b>585</b>	<b>605</b>	<b>650</b>
<b>% over 550 home target</b>		<b>-</b>	<b>-</b>	<b>1%</b>	<b>6%</b>	<b>6%</b>	<b>10%</b>	<b>18%</b>

\* There is a need to reiterate two points. Firstly, these homes would be in addition to the land supply supported by the submission plan. Secondly, a further 100 additional homes are proposed at Garlick's Arch, but would be delivered in year 6.



There are relatively few considerations in respect of the smaller village sites; however, there are a number of notable issues.

- The two Send Marsh sites (both allocated under Option 6) are in close proximity (<400m) to Papercourt Site of Special Scientific Interest (SSSI), which is an extensive complex of wetland habitats; however, it is noted that Papercourt Lake is home to a sailing club, and two of the other sites within the complex are managed as nature reserves by the Wildlife Trusts.
- Glaziers Lane, Flexford is within c.2km of the TBHSPA; however, there is sufficient SANG capacity at Russell Place Farm, to the west of Guildford. Also, the site has a stream at its eastern extent, which drains south to nearby Little Flexford SNCI, and falls within the Wanborough and Normandy Woods and Meadows BOA.
- Hornhatch Farm is adjacent to Wonnersh Common, which whilst not designated as an SNCI is designated common land, potentially indicating a degree of biodiversity value).

In **conclusion**, Option 4 (Clandon Golf + Small sites) performs best, including on the basis that it would lead to least concerns in respect of the SPA, and vice versa Option 2 (Liddington Hall + Aaron's Hill) performs worst. It is difficult to differentiate the other alternatives, and so they are judged to perform broadly on a par.

In respect of effect significance, taking the baseline situation as being one whereby submission allocations are found sound and adopted (i.e. focusing just on assessment of the proposal to allocate land for an additional 650 (550 + 100) homes), none of the scenarios would lead to significant effects. This reflects the relatively low quantum of homes involved, and the high likelihood that effective mitigation could be put in place, in particular through strategic and/or bespoke SANG.

Mitigate **climate change** through reducing emissions of greenhouse gases

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	1	1	3	4	4	4	2
Significant effects?	No						
Discussion	<p>There is no potential to differentiate the alternatives in respect of CO<sub>2</sub> emissions from the built environment, as none of the sites in question are of sufficient scale to deliver new low carbon infrastructure (e.g. combined heat and power generation).</p> <p>In respect of CO<sub>2</sub> emissions from transport, all of the <u>smaller/village sites</u> under consideration perform relatively poorly, given limited or no potential to access services / facilities by walking, cycling or public transport. The two Send Marsh sites perform particularly poorly, in this respect, as there is no train station nearby, access to a bus route is a c.800m walk to the south and services/facilities in Send (e.g. GP surgery) are over 1km distant. <b>Flexford is also notable in that it is a small village without even a primary school; however, it does benefit from a train station (and nearby Normandy does have a primary school and a GP surgery).</b></p> <p>The three <u>larger urban extension sites</u> perform notably better in comparison -</p> <ul style="list-style-type: none"> <li>• Clandon Golf is approximately 3km from Guildford town centre, but Merrow Local Centre is approximately 1km away. The site is adjacent to the Merrow Park &amp; Ride from where there are frequent bus services into Guildford town centre as well as advisory cycle lanes along the majority of Epsom Road between the town centre and the Park and Ride site, with opportunities for improvement.</li> <li>• Liddington Hall is also approximately 3km to the town centre, but is slightly closer to a local centre (800m to Worplesdon Road in Stoughton). The site falls between two A roads (to Aldershot and Woking), both of which are associated with regular bus services; bus stops would likely be within a 400m easy walking distance for most new residents. The new proposed railway station at Guildford West will be 1.5km from the site and the Hospital, Research Park and University are also within 2km of the site.</li> <li>• Aaron's Hill is within c.1km of Godalming train station and the town centre beyond, which provides a good range of shops, services and employment, albeit on a significantly smaller scale compared to Guildford town centre. Direct access will be via the Waverley Borough part of the site, and then along a public bridleway through a valley woodland, which is steep in parts and crosses the railway line. The proposal is to enhance public accessibility through the valley woodland - see discussion above, under 'Biodiversity' - and it is noted that the Preferred Options version of the Waverley Local Plan Part 2 (May 2018) proposes the following site-specific requirement: "Connections and improvements to the bridleway connecting Halfway Lane and New Way for pedestrians and cyclists, which preserve or enhance its historic character." There is a bus stop nearby with an hourly service (not Sundays), and a further two services per hour run along the Portsmouth Road (seven days a week), albeit the bus stops are at least 800m distant.</li> </ul> <p>In <b>conclusion</b>, dispersal of development amongst smaller village sites is not supported, and, on balance, Aaron's Hill is considered to be the preferable site amongst the three larger site options. This conclusion determines the alternatives ranking.</p> <p>With regard to effect significance, no significant effects are predicted. Climate change mitigation is a global issue, and hence it is not possible to conclude on the significance of local actions.</p>						



Reduce the risk of **flooding** and the resulting detriment to the public... the economy and the environment

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	=	=	=	=	=	=	=
Significant effects?	No						
Discussion	<p>Flood risk is a considerable constraint to growth, as established through a Level 1 Strategic Flood Risk Assessment (Level 1 SFRA). Flood risk in the Borough is primarily fluvial, with by far the largest floodplain being that associated with the River Wey, which passes through the centre of Guildford Town, although there is also some risk of flooding from other sources (surface water, groundwater, sewers and artificial sources).</p> <p>There are three issues of note -</p> <ul style="list-style-type: none"> <li>Land at Polesdon Lane &amp; Send Marsh Road, Send Marsh abuts an area of fluvial flood risk at its northern extent, albeit the extent of the flood risk zone is currently the subject of Environment Agency flood map challenge (i.e. the site promoters have submitted evidence to suggest that the flood risk zone is less extensive). The current promoted site purposely avoids the flood zone (as currently understood), with a larger site, encompassing the flood zone, having previously been promoted.</li> <li>Glaziers Lane at Flexford is associated with a degree of surface water flood risk at its eastern extent.</li> <li>Aaron's Hill is not subject to flood risk; however, the eastern extent of the site (which falls within Waverley Borough) does intersect the 'Flood Watch' zone that has been defined for Godalming town centre and the surrounding steep hillsides. The Flood Risk Assessment submitted as part of the planning application for the adjacent site (which falls within Waverley Borough, and is closer to Godalming town centre than the Guildford site) concludes the following: <i>"Discharge options have been considered in line with the Building Regulations Part H requirements. Soakaway tests have indicated that infiltration rates are poor in some parts of the site to utilise infiltration in isolation to drain surface water. Therefore a staged discharge approach is used in line with the recommendation based on Greenfield rates. However, based on best practice guidance, it is recommended not to restrict the lowest discharge rate beyond the rate required to achieve self cleaning velocity. Sustainable Drainage System (SuDS) features proposed for the site include infiltration basins, permeable paving and soakaways. Based on the findings of this assessment, the flood risk associated with the proposed development is considered low."</i><sup>30</sup></li> </ul> <p>In <b>conclusion</b>, it is not clear that any of the sites give rise to significant flood risk concerns, given the potential to avoid/mitigate effects at the planning application stage.</p>						

<sup>30</sup> <http://planning360.waverley.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=7003488>

Facilitate improved **health and well-being** of the population, including... reducing inequalities in health

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	=						
Significant effects?	No						
Discussion	<p>The sustainability objective here is to <i>“Facilitate improved health and well-being of the population, including enabling people to stay independent and reducing inequalities in health”</i>, an objective that overlaps considerably with a number of other sustainability objectives including those relating to ‘Communities’, ‘Housing’, ‘Poverty and social exclusion’ and ‘Transport’. Given the need to avoid overlap and repetition, there is no potential to differentiate the alternatives in terms of ‘health’. The following are issues, but do not enable differentiation -</p> <ol style="list-style-type: none"> <li><b>Access to a GP surgery</b> – All of the sites that are a focus of this appraisal (i.e. are a variable across the alternatives, and hence enable differentiation) would enable access to a GP surgery, and there is little potential to conclude on the ability of surgeries to accept additional patients or expand. For example, with regards to the smaller sites, there is GP surgery at Send (accessible from the Send Marsh sites), <b>Normandy (accessible from East of Glaziers Lane, Flexford)</b> and Wonnersh (accessible from Hornhatch Farm, Chilworth).</li> <li>Health deprivation – The Index of Multiple Deprivation (IMD) ‘Health and Disability’ domain dataset shows a number of locations under consideration here to be some areas of ‘relative health deprivation’, namely the Send/Ripley area, the Chilworth area and the Aaron’s Hill (Godalming) area; however, there is little potential to suggest implications for existing issues of health deprivation, either positive or negative.</li> <li>Active travel – It might be suggested that the larger sites on the edge main urban areas would support walking/cycling to reach employment, services, facilities etc, whilst sites at villages perform less well in this respect; however, there is little certainty. All sites would support access to high quality countryside and open space (note that Liddington Hall is crossed by public rights of way, as discussed above).</li> <li>Air quality – The Air Quality Review for the Local Plan concludes: <i>“... the findings of the air quality review suggest that the effect of the proposed Local Plan on annual mean NO2 concentrations will be negligible in the majority of the GBC administrative area. However, further detailed modelling would be advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors, specifically: A3, Ripley Bypass; Aldershot East; and the area around the A3/A31 junction at Onslow Village.”</i> There is little or no reason to suggest that the alternatives will have differential impacts on traffic at any of these locations.</li> </ol> <p>In <b>conclusion</b>, it is not possible to differentiate the alternatives, nor is it possible to conclude on effect significance (recognising the wide-ranging nature of health determinants).</p>						

Conserve and enhance landscape character

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	2	1	2	3	2	2	2
Significant effects?	No						
Discussion	<p>Landscape capacity/sensitivity was a key factor taken into account when establishing the additional housing scenarios, recognising that there is a need to avoid greenfield development within the AONB (which covers the southern half of the borough) and avoid loss of Green Belt (which covers 89 per cent of the borough), in particular Green Belt that is high sensitivity (i.e. contributes to the nationally established Green Belt purposes).<sup>32</sup> Also, there is land adjacent to the AONB that is currently designated as an Area of Great Landscape Value (AGLV), an important designation, including because of the ongoing AONB boundary review. Finally, there is a need to recognise that all landscapes within Guildford will have an identified character, with varying degrees of importance and sensitivity. A landscape character assessment (LCA) study does examine all landscape parcels in Guildford; however, this is undertaken at a broad scale, with no discussion of sites.</p> <p>Notable issues, taking the sites in rough order of preference (worst to best), are as follows -</p> <ul style="list-style-type: none"> <li>• Aaron's Hill (Godalming) falls within the AGLV and comprises red-rated Green Belt. The site is a large, open arable field, with extensive views across the site from Eashing Lane and the Foxes Way long distance path (bridleway), including longer distance views to the north, across the Wey Valley. However, views are already set to be impacted by the committed Waverley part of this cross-border site, and, with this being the case, the development may have some beneficial effects, in landscape terms. In particular, allocation might be considered a 'positive' in certain Green Belt terms, as it will ensure a robust, defensible Green Belt boundary, in the form of Halfway Lane. It is noted that the Landscape and Visual Impact Assessment (LVIA) recently submitted alongside the planning application for the Waverley part of the site concludes that the long term landscape effect of development would be beneficial, as <i>"Halfway Lane...could be used as a clear urban edge, and with appropriate landscape treatment would be softer than the current hard and intrusive urban edge."</i><sup>33</sup></li> <li>• Clandon Golf comprises red-rated Green Belt and AGLV; however, the LCA does not reference this golf course as a particular asset within the Merrow and Clandon Wooded Chalk Downs character area (whilst nearby Guildford Golf Course is referenced).</li> <li>• Hornhatch Farm (Chilworth) is adjacent to the AGLV, in close proximity to the AONB and comprising red-rated Green Belt.</li> <li>• East of Glaziers Lane (Flexford) is not associated with a designated landscape; however, it is red-rated Green Belt and development would introduce development in depth to the north of the railway line, where currently there is only frontage development.</li> <li>• Liddington Hall - comprises red-rated Green Belt, rising land and is crossed by footpaths; however, the site is seemingly well contained, with built form along most of the boundary.</li> </ul>						

<sup>32</sup> Green Belt is not technically a landscape designation. However, given that all Green Belt parcels have been classified according to sensitivity (i.e. a parcel is sensitive where it contributes to Green Belt purposes), it is helpful to take account of Green Belt sensitivity.

<sup>33</sup> <http://planning360.waverley.gov.uk/civica/Resource/Civica/Handler.ashx/Doc/pagestream?cd=inline&pdf=true&docno=7002232>



### Enhance the borough's rural economy

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	=						
Significant effects?	No						
Discussion	<p>The village extension sites might potentially contribute to the rural economy to some extent, with Flexford being notably the smallest and most rural of the villages under consideration; however, it is difficult to identify any particular opportunities. There are no existing facilities in Flexford, and so it is not possible to argue that development would help to secure the long term future of village facilities, and hence contribute to village vitality in this way. There is a GP and primary school in nearby Normandy, but there is nothing to indicate that these facilities are under pressure due to low demand. There has been nothing to indicate that the site might deliver any employment space (e.g. small-scale flexible office space), but this is perhaps an opportunity that could be explored through the planning application process.</p> <p>In <b>conclusion</b>, it is not possible to differentiate the alternatives with any certainty, and significant effects are not predicted.</p>						

### Create and maintain safer and more secure communities

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
	Clandon Golf Aaron's Hill	Lidd'ton Hall Aaron's Hill	Aaron's Hill Small sites	Clandon Golf Small sites	Lidd'ton Hall Small sites	Aaron's Hill Small sites +	Clandon Golf Lidd'ton Hall
Rank	=						
Significant effects?	No						
Discussion	<p>Of the site options that are a focus of this current appraisal, i.e. those that are a variable across the scenarios, all are concerned with creating new communities rather than redeveloping urban areas / regenerating existing communities. Whilst it is fair to say that new communities will enhance the vitality of adjacent/nearby communities, it is not possible to draw conclusions in relation to safety/security.</p> <p>Another issue locally is pedestrian, cyclist and road traffic; however, none of the sites in question are thought to be associated with any particular issues, in this respect.</p>						