WAVERLEY BOROUGH COUNCIL

LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY
PREFERRED OPTIONS AND DRAFT POLICIES

SUSTAINABILITY APPRAISAL REPORT
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1. Introduction - The Waverley Local Development Framework and Core Strategy

1.1 The Waverley Core Strategy is one of a number of documents that together will form the Local Development Framework (LDF) for the Borough. The LDF will set out the policies relating to the development and use of land in Waverley.

1.2 The Core Strategy sets out the overall strategy to guide and direct new development in the Borough for the period up to 2027.

2. The purpose of Sustainability Appraisal

2.1 Sustainability appraisal provides a structured approach to considering the sustainability credentials of a plan.

2.2 By considering the strategy and policy of the plan against a set of sustainability objectives it is possible to identify how the plan can best achieve development that balances the interests of the economy and community with those of the environment.

2.3 Sustainability appraisal has been undertaken at an early stage of plan making whereby different options for meeting development and community needs have been considered against sustainability objectives.

3. The Sustainability Appraisal process

3.1 Sustainability appraisal involves a series of tasks that establish a detailed understanding about the economic, social and environmental conditions of the Borough. In this way key sustainability objectives can be established.

3.2 Strategies, policies and site specific proposals can be considered against the sustainability objectives and within the context of the conditions of the Borough.

3.3 The stages of sustainability appraisal are:
   - Identify sustainability objectives
   - Compile a baseline of economic, social and environmental conditions of the Borough
   - Consider plan options against the objectives to inform preferences
   - Test the strategy and policies that are included in the final plan

3.4 The appraisal process has been led by Tom Sylger Jones, MRTPI. Tom is an independent planning consultant with specialist experience and knowledge of sustainable development.

3.5 This report has been prepared by Tom Sylger Jones to inform the process of producing the Local Development Framework for Waverley Borough.
4. The Sustainability objectives

4.1 A set of sustainability objectives has been developed through discussion with partner organisations. The 19 objectives provide the headings for the main part of this report and are set out below.

1 – Reduce poverty and social exclusion
2 – Improve the health of the population
3 – Improve the education and skills of the population
4 – Ensure everyone has the opportunity to live in a decent and affordable home
5 – Reduce crime, the fear of crime and antisocial activity
6 – Encourage community identity and participation
7 – Ensure high and stable levels of employment
8 – Improve accessibility to services, facilities and amenities
9 – Improve the satisfaction of people with their neighbourhood as a place to live
10 – Prevent and control pollution
11 – Maintain and enhance biodiversity and soil
12 – Maintain and enhance the quality of landscapes and townscapes
13 – Conserve and enhance the historic environment
14 – Reduce vulnerability to climate change, especially flooding
15 – Use energy, water and other natural resources efficiently and minimize carbon emissions so as to address the causes of climate change
16 – Encourage sustained economic growth
17 – Enhance the image of the Borough as a business location
18 – Encourage efficient patterns of movement
19 – Encourage development of a sustainable tourism sector

5. The Baseline

5.1 Information about the economic, social and environmental conditions of the Borough has been collated and is presented in Appendix 1. This information has been used to inform appraisal.

5.2 The baseline draws on the following documents:

- Surrey Strategic Partnership Plan
- Borough Spatial Portrait
- LDF evidence base

6. Appraisal of the Waverley Core Strategy

6.1 The Core Strategy Preferred Options and draft Policies has been informed by a series of appraisals.

6.2 Initially appraisal informed:

- The draft vision and objectives;
- the Issues and Options that were consulted on, through a series of Topic Papers, in 2009;
the housing options consulted on early in 2010; and
the recent consultation on the housing target.

6.3 Full details of the consideration of sustainability issues are provided in Appendix 2. This report provides an account of the key findings of the SA process.

Summary of the appraisal of the options for the level of housing growth

6.3 A key issue to be addressed through the Core Strategy is the level of growth in the Borough between now and 2027. The Council presented options in relation to the overall amount of housing to plan for both during the consultation on the Issues and Options Topic Papers in 2009 and again in a recent consultation, which specifically focussed on housing numbers. In the Topic Paper consultation the Council asked whether it should plan to deliver the 5,000 new homes required by the South East Plan, or whether it should actively plan to deliver more than 5,000 new homes. The justification for asking the question was presented by the South East Plan, which effectively allows local planning authorities to decide whether to plan to deliver more homes than the specific allocation in the plan.

6.4 Following the announcement of the Coalition Government’s intention to abolish regional spatial strategies, the council decided to consult with the local community and other key stakeholders to help decide what the local housing target for Waverley should be. That consultation took place in September/October 2010.

6.5 Three options were considered with respect to the level of housing growth for Waverley:

Option 1: a number based on the South East Plan. This would be in the region of 230 to 250 dwellings per year.

Option 2: a number based on an estimate of land available to build homes on land. This would be a capacity based approach informed by the SHLAA, together with some allowance for ‘windfall’ sites, and would be in the region of 150 to 200 dwellings per year.

Option 3: a number based on the need and demand for homes in Waverley. This would be informed by the Strategic Housing Market Assessment, which is informed by Housing Needs Assessment, projections for growth provided by the Office of National Statistics; and the Waverley Borough Council Housing Needs Register. The figure would be in the region of at least 300 dwellings per year.
6.6 A detailed account of the key issues arising for each option with respect to each of the sustainability objectives is provided in Appendix 2. The predicted impacts of each option against the sustainability objectives is set out in table 1 below, with a summary of the major issues following.

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6.7 The key finding of appraisal was that for Option 2 and Option 3 both positive and negative outcomes would be likely with respect to the broad sustainability objectives. For Option 1 no major adverse impacts have been identified. Uncertainty exists for all options since both positive and negative impacts may occur with respect to an individual SA objective; and it is sometimes difficult to be sure that an impact would occur without a clear indication of which specific geographic locations would be affected.

6.8 For Option 1 appraisal identified that this 'mid' level of growth would be likely to be predominantly delivered in areas near or within existing centres. This would result in good links to existing services, education opportunities and employment opportunities both within and outside the Borough.

6.9 A great degree of uncertainty exists with Option 1, however, since it is not at this time clear whether the development could be accommodated without adverse impacts with respect to biodiversity, landscape and heritage. Under this option it may be necessary to release greenfield sites and/or increase densities within settlements, with the resulting impact on landscapes and townscapes. There are also the questions of whether appropriate levels of provision of services could be maintained; whether a sufficient number of affordable homes would be available; and whether the subsequent pattern of development would support a move to more sustainable forms of transport. There is also the issue that if not enough housing is provided to meet need, then it could have an adverse impact from the need for employees to live outside the Borough and commute in.

6.10 If Option 1 were taken forward, therefore, the following issues would need to be addressed by the strategic choice of sites and by policy criteria:
• ensuring services and infrastructure are sufficient to support improved self sufficiency of settlements
• ensuring the location of development supports the ability to walk, cycle and take public transport to services and employment
• ensure that development is delivered in a manner that supports more sustainable forms of transport, low carbon energy and biodiversity
• impact on the Thames Basin Heaths SPA
• impact on designated and other important habitats
• avoiding impact with respect to flood risk
• maximising the provision of affordable housing
• impact on landscape and townscape

6.11 Appraisal found that the lower level of growth proposed by Option 2 would lead to benefits with respect to avoiding the worst impacts that would be associated with higher levels of growth on natural habitats, flood risk and protected landscapes. This option would be the least likely to require the release of greenfield sites and/or the need to increase densities within settlements, with the associated impacts on landscapes and townscapes.

6.12 The ability to maintain the quality of life for existing residents in terms of access to services, employment and the countryside would be a positive impact to an extent. This option would also be the least likely to require development in more remote locations. The main disadvantage of this option is that it would not meet all housing need. This could potentially lead to social exclusion. It could also have an adverse impact with respect to transport as more employees would need to live outside the Borough and commute in. It is noted that a positive entry has been made with respect to sustainable transport and this is on the basis that the lower level of growth would be most likely accommodated in existing settlements where access on foot, cycle and public transport is best. The potential problem with Option 2 in this respect would be the ability of the economy to draw on suitable pool of employees.

6.13 If Option 2 were taken forward the following issues would need to be addressed by the strategic choice of sites and by policy criteria:
• ensuring the location of development supports the ability to walk, cycle and take public transport to services and employment
• ensuring that development is delivered in a manner that supports more sustainable forms of transport, low carbon energy and biodiversity
• maximising the provision of affordable housing
• Impact on the Thames Basin Heaths SPA

6.14 Option 3 proposes the highest level of growth and appraisal found that this would be the most likely to deliver sufficient affordable homes. In doing so, however, this option would have the greatest negative impacts with respect to protected and other landscapes, townscape and heritage. The increased need to develop land in more remote locations could also result in unsustainable patterns of movement between residential areas and services and employment.

6.15 As with all options potentially adverse impacts could occur with respect to biodiversity and flood risk.
6.16 If Option 3 were taken forward the following issues would need to be addressed by the strategic choice of sites and by policy criteria as identified below. These are identical to the issues for Option 1, but the potential for adverse impacts would be more pronounced with the exception of affordable housing. In this respect provision would remain important, but the objective is likely to be more easily achievable.

- ensuring services and infrastructure are sufficient to support improved self-sufficiency of settlements
- ensuring the location of development supports the ability to walk, cycle and take public transport to services and employment
- ensure that development is delivered in a manner that supports more sustainable forms of transport, low carbon energy and biodiversity
- impact on the Thames Basin Heaths SPA
- impact on designated and other important habitats
- avoiding impact with respect to flood risk
- maximising the provision of affordable housing
- Impact on landscape and townscape

Summary of the appraisal of the strategic options for location of development

6.17 The five options that were considered all have development in the four main towns as the core focus, with any shortfall being accommodated through:

1. selected land releases around these settlements
2. 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. selected land releases around these settlements and within and potentially around villages
4. a single urban extension
5. a free standing settlement

6.18 A detailed account of the key issues arising for each option with respect to each of the sustainability objectives is provided in Appendix 2. The results of the sustainability appraisal of the strategic options for location of development are shown in Table 3 below, with a summary of the major issues following.

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The key finding of appraisal was that for Option 1, Option 2 and Option 3 more positive outcomes would be likely with respect to the broad sustainability objectives than with Options 4 and 5. For Option 1 no major adverse impacts have been identified. Uncertainty exists for all options since both positive and negative impacts may occur with respect to an individual SA objective. For Option 4 and Option 5 negative outcomes are predicted since they are most likely to require development in more remote locations, where access to services and facilities is not as good as locations based on existing settlements. Options 4 and 5 are also least likely to meet the wider social and economic needs across the Borough as a whole.

For Option 1 appraisal identified that the focus of growth in areas near or within existing centres would maximise accessibility to services, education opportunities and employment opportunities both within and outside the Borough; and provide a strong basis to consolidate and improve sustainable patterns of transport. However, it is recognised that this option would be less responsive to meeting the need for market housing in the villages.

It is considered that this option would also be most likely to consolidate and build on existing social cohesion and help maintain healthy, self sufficient communities. The potential benefits with respect to low carbon energy networks and climate change resilience are also strongly positive.

As with all options great degree of uncertainty exists with Option 1, however, since it is not at this time clear whether development could be accommodated without adverse impacts with respect to biodiversity, landscape and heritage.

Option 2 and Option 3 are considered likely to have similar impacts as predicted for Option 1. The benefits would be diluted to an extent, however, since there is less certainty that the locations for development would be the best locations to support sustainable patterns of transport. A positive element in this respect, however, is that individual village communities would have an opportunity to improve self sufficiency. In relation to Option 2, the additional settlements affected by this option are generally located in areas where the landscape is specially designated, increasing the risk of adverse impact on landscapes. In relation to options 1-3 the potential impact on the designated areas of biodiversity interest, particularly the Thames Basin Heaths SPA would need to be considered carefully. Similarly it would be necessary to carefully consider the potential impact of further growth on the identified Air Quality Management areas in Farnham, Hindhead and Godalming.

With respect to Option 4 and Option 5 there is a great degree of uncertainty since the precise location of development is unknown at this time. Whilst it may be possible to locate a new settlement or urban extension away from specially designated areas of landscape and biodiversity interest, the sheer scale of a new settlement or urban extension may itself impact on the landscape and biodiversity generally of the chosen location. It is true, however, that benefits could be delivered but this would depend on the nature and location of development.
6.25 The most substantially negative impact with respect to Option 5 is likely to be the isolated nature of development. Whilst it is recognised that public transport systems can be introduced, the opportunity to drive to services and employment outside the Borough would remain and could prove very difficult to limit to a level commensurate with sustainable patterns of transport. It is considered that for this issue and others, including access to local services, biodiversity benefits, low carbon communities and social cohesion, the strategic and site specific approach would need substantial mitigation measures to ensure a new settlement could meet sustainability objectives. The same is true for an urban extension, although the severity of potential negative impacts may not be so acute.

The appraisal of the Core Strategy Preferred Options and Draft Policies

6.26 Policies that direct and guide the location and form of development are essential to ensuring sustainability principles are followed. The following commentary has been informed by appraisal of the level of growth, appraisal of strategic options for the location of development and appraisal of issues and options (Topic Papers in 2007).

6.27 A detailed account of how these appraisals is provided in Appendix 2. A summary of the key issues for each policy is provided below.

Policy CS1: Location of Development

6.28 New development will be directed towards previously developed land within the built up areas of Farnham, Godalming, Haslemere and Cranleigh. These are the settlements in Waverley that are the most sustainable locations since they offer the best access to services and facilities by walking, cycling and public transport.

Policy CS2: The Amount and Location of Housing

6.29 The Council will make provision for at least 2,591 net additional homes in the period from 2010 to 2026. Appraisal has identified that this lower level of growth is more easily accommodated within existing settlements without compromising environmental interests such as greenspace and heritage. It is the least likely option to require the use of greenfield sites.

6.30 A potential adverse impact may be that housing need is not met within the Borough. Availability of affordable housing is also a factor in delivering sustainable economic development.

Policy CS3: Sustainable Transport

6.31 The Council will work in partnership with Surrey County Council, key stakeholders and transport providers to ensure that development helps
deliver a more sustainable pattern of movement and more sustainable modes of transport in the form of walking, cycling and public transport.

6.32 Recognising that congestion is a problem in Surrey, this is a key issue to delivering sustainable economy as well as addressing the causes of climate change.

6.33 Sustainable transport also supports social equality by enabling easier access for all.

**Policy CS4: Infrastructure and Community Facilities**

6.34 New development will be required to provide, or meet the reasonable cost of providing, the necessary community facilities, open space, transport infrastructure and other infrastructure requirements to meet the community needs arising from the proposal.

6.35 Appraisal has identified that this is essential for community cohesion, equal access and to help reduce the need to travel by car.

**Policy CS5: Affordable housing on Development Sites**

6.36 Establishes that on sites where new housing is acceptable in principle the Council will require a minimum provision of affordable housing, allowing for viability testing.

6.37 Appraisal has identified that the delivery of affordable housing is a key issue for sustaining the Borough economy since many employees are currently not able to afford market housing and are, consequently, forced to commute from areas outside Waverley where housing is cheaper.

**Policy CS6: Rural Exception Sites**

6.38 This policy makes provision for affordable housing to be delivered in rural areas where specific criteria can be met. The Council must be satisfied that there is a genuine local need for affordable housing which cannot be met in some other way. Development would be of a small scale on land that is within, adjoins or closely related to the existing rural settlement.

6.39 Appraisal identified that this policy was necessary to ensure that the needs of people living and working in rural areas can be met. It may also support the retention of services, which would enable people to maintain good access by walking and cycling.

6.40 The criteria specified will avoid harm to environmental assets.

6.41 Meeting other sustainability criteria such as new habitat, renewable energy and other green infrastructure measures will be important. The provisions of Policy CS18 and Policy CS19 are, therefore, key supplementary requirements to Policy CS6.
Policy CS7: Housing Type and Size

6.42 The Council will require proposals for new housing to make provision for a range of types and sizes of housing to meet the needs of the community, reflecting the most up to date evidence in the Strategic Housing market Assessment.

6.43 The ability to meet the specific needs of the Borough in this flexible manner will support sustainability objectives.

Policy CS8: Gypsies, Travellers and Travelling Showpeople

6.44 To meet any identified need for Gypsies, Travellers and Travelling Showpeople pitches within the Borough, sufficient sites will be allocated within the Land Allocations Development Plan Document (DPD). This supports meeting the wide range of accommodation needs, which is an important principle of sustainability.

Policy CS9: Sustainable Employment Development

6.45 Predicted economic growth will be supported through the provision of a flexible supply of employment land to meet the different needs of the economy. This will involve identifying suitably located industrial and commercial sites for protection against alternative uses in the Council's Development Management and Site Allocations Development Plan Document (DPD) and retaining other suitably located employment sites where appropriate.

6.46 Industrial and commercial development would also be encouraged as part of mixed use schemes including residential developments. The re-use and conversion of existing rural buildings would be encouraged outside settlements.

6.47 This approach will support a balanced economy that is able to grow in the main settlements and in more rural areas. Smart economic growth is encouraged through mixed development, although the provisions of Policy CS18 and CS19 will play an important role in ensuring sustainability credentials are maximised.

Policy CS10: Town Centres

6.48 Measures to improve the town centres within the Borough will be encouraged provided that they help them to adapt and reinforce their role in meeting needs, acting as the focus for a range of activities, including retailing, leisure, cultural, business and residential uses, and do not cause unacceptable levels of disturbance to the local community or damage the townscape character.
6.49 Appraisal indicates that this is a key policy to ensure services and facilities are accessible for the majority of the population using sustainable modes of transport.

Policy CS11: Local Centres

6.50 The retail role and function of the local centres of Farncombe, Bramley and Milford will be safeguarded and consolidated. Proposals that would harm or undermine the retail function of the centre of detract from its vitality and viability will not be permitted.

6.51 Proposals for the provision of small scale facilities that would support the vitality and viability of these centres will be supported.

6.52 Appraisal indicates that this is a key policy to ensure services and facilities are accessible for the majority of the population using sustainable modes of transport.

Policy CS12: Neighbourhood and Village Shops

6.53 The Council will resist the loss of shops and services that are deemed to be important to the community. The Council will respond positively to proposals for the conversion and extension of shops which are designed to improve their viability but do not result in their loss or change of use.

6.54 Appraisal indicates that this is a key policy to ensure services and facilities are accessible for the majority of the population using sustainable modes of transport.

Policy CS13: Leisure Recreation and Cultural Facilities

6.55 This policy seeks to protect leisure, recreation and cultural facilities from development/changes of use. The benefits to the health of the population and to biodiversity would be substantial.

6.56 The policy also promotes the provision of new green space within a network of green infrastructure. This is a key element in addressing climate change.

Policy CS14: Landscape Character

6.57 It will be a requirement of policy that new development must respect and where appropriate enhance the distinctive character of the landscape in which it is located.

6.58 The character and qualities of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Area of Great Landscape Value (AGLV) will be protected. The Farnham/Aldershot Strategic Gap will be protected by resisting inappropriate development.

6.59 The appearance of the Areas of Strategic Visual Importance will be maintained and enhanced. Proposals for new development within the ASVI
will be required to demonstrate that the development would not be inconsistent with this objective.

6.60 This policy provides a comprehensive level of protection to landscape, which is a key economic, social and environmental asset of the Borough. It does not preclude development where it is essential and sensitively designed and is, therefore, compatible with sustainability objectives.

Policy CS15: Townscape and Urban Design and the Heritage

6.61 The Council will ensure that the character and amenity of its towns and villages will be protected. This will be achieved through the use of assessment and high quality design.

6.62 The policy protects an important economic, social and environmental asset. It does not preclude development where it is essential and sensitively designed and is, therefore, compatible with sustainability objectives.

Policy CS16: Biodiversity and Geological Conservation

6.63 Biodiversity will be protected primarily by resisting inappropriate development on or near to designated habitats. On locally designated sites protection will include those habitats and species listed in the Surrey Biodiversity Action Plan (BAP).

6.64 New development will be encouraged to make a positive contribution to biodiversity in the Borough, through the creation of green spaces, where appropriate, and the creation of linkages between sites to create a local and regional biodiversity network of wildlife corridors and green infrastructure.

6.65 This is a key policy that will ensure the plan makes a strong contribution to this fundamental sustainability objective.

Policy CS17: Thames Basin Heaths Special Protection Area

6.66 New residential development which is likely to have a significant effect on the ecological integrity of Thames Basin Heaths Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Such measures must be agreed with Natural England.

6.67 Within the 400m "exclusion zone" of the SPA boundary, mitigation measures are unlikely to be capable of protecting the integrity of the SPA.

6.68 New residential development which the Council considers that either alone or in combination is likely to have a significant effect on the SPA beyond 400m and within 5km of the SPA boundary (in a straight line) must provide contributions towards the provision of Suitable Alternative Natural Greenspace (SANG) and the wider access management and monitoring of the SPA.
6.69 This is a key policy that will ensure the plan makes a strong contribution to this fundamental sustainability objective. By identifying appropriate avoidance/mitigation measures in the form of SANG and the access management and monitoring of the SPA, the policy balances the need for development with the need to protect biodiversity.

Policy CS18: Sustainable Design and Construction

6.70 The Council will seek to promote sustainable patterns of development and reduce the level of greenhouse gas emissions. Key measures will include energy efficiency, renewable energy, sustainable drainage systems and green infrastructure.

6.71 This is a key policy that helps to balance economic needs with environmental protection.

Policy CS19: Renewable Energy Development

6.72 Policy supports the development of renewable energy in principle but requires that installations be located and designed to minimise adverse impacts on landscape, wildlife, heritage assets and amenity.

6.73 This strongly supports sustainability since renewable energy can improve energy security and help address the causes of climate change. A more sustainable approach would be to seek to address fuel poverty through the provision of renewable energy as a priority.
Appendix 1: Baseline information
Sustainability Appraisal Objective 1: Reduce Poverty and Social Exclusion

The settlement hierarchy (2010) identifies that Farnham, Godalming, Haslemere and Cranleigh provide the greatest number and range of community services and facilities to meet the needs of the local community. Milford, Hindhead and Beacon Hill, Bramley, Witley, Elstead and Chiddingfold all have the good range of services expected in larger rural and/ or suburban villages. If some services are not available within those settlements, then they are available in that adjoining, and this is particularly the case with doctors surgeries. Alfold, Ewhurst, Churt, Shamley Green, Dunsfold, Grayswood, Tilford and Wormley have limited services. Other villages have very limited services.

The SA Scoping Report (2007) identifies that Godalming Central, Godalming Binscombe and Ockford have lower income and skills compared with other areas of Surrey; Godalming Binscombe and Farnham Upper Hale have employment deprivation relative to other parts of surrey; and Farnham Upper Hale relative health deprivation. The overall index places Farnham Upper Hale and Godalming Central and Ockford highest (most deprived) although this is relative to Surrey and should be considered in the context of the County having generally low deprivation scores. Isolated deprivation may, however, be more difficult to address. Whilst not yet complete, research to inform the Infrastructure Delivery Plan has not identified any significant concerns with respect to the provision of infrastructure in the Borough.

The Employment Land Review reports that the over-riding drive of other national, regional and local policies is that, in economically advantaged areas, existing or allocated employment land which is suitable for employment should be safeguarded for this purpose. It continues, stating that this approach will be particularly pertinent in Waverley (paragraph 2.6.2). The ELR does, however, identify at paragraph 2.6.4 a ‘lack of sound evidence regarding quantitative need for employment land and floorspace in the region’.

The Surrey Strategic Partnership Plan identifies that Waverley has the highest percentage of the over 65 population in Surrey and nearly one in ten of the population are estimated to be over 75. Waverley is a sought after place to live but this affluence can mask the areas of deprivation that do exist within the borough. Access to services can be a major issue in Waverley. Transport links are good to London, but not necessarily across the borough and some more rural villages are dependent on infrequent bus services and/or travel by private car.

The SHMA estimates that the number of overcrowded households in Waverley is relatively low at 1.1% (537 households) compared to a national average of 2.7% of households and a figure for the South East being 2.0%. A significant finding of the study is the relatively high proportion of council tenants in Waverly (40.2%) containing only older people. This may have implications for future supply of and demand for specialised social rented accommodation. Car ownership data suggests there is an average of 1.46 cars per household in the Borough, although there are large differences by tenure with owner-occupiers with a mortgage having 1.79 cars per household, compared with an average of only 0.72 in the Council rented sector. Around two-fifths of households in Waverley live in an area defined as rural. Rural households have higher average levels of income and savings and are more likely to have access to a car. However, rural households were more likely to state a problem with access to public transport. An estimated 1,595 households have been newly formed within the Borough over the past two years. Of these it is estimated that 294 per annum are unable to afford market housing without some form of subsidy.
Overall the SHMA estimates there will be a net increase in households of around 706 per annum (made up of 220 from natural change and 486 due to net in-migration).

**Sustainability Appraisal Objective 2: Improve the health of the population**

In the SA Scoping Report Farnham Upper Hale is reported to suffer health deprivation although this is relative to the whole of Surrey and should be considered in the context of the county having generally low deprivation scores. The key objectives of the Surrey NHS Transformation Plan 2010 to 2015 include reducing health inequalities through the provision of GP-led Health Centres. The draft Settlement Hierarchy indicates that in some rural areas there is a reliance on travel/public transport to access health facilities. The Cranleigh Healthcheck reported the need for further services in Cranleigh and for community and home based support, and transport to Royal Surrey Hospital.

Research to inform the Infrastructure Delivery Plan identifies that the provision of GPs in Waverley is mainly above the national benchmark of 1 per 1700 population with an average of 1 per 1481 population. There is a shortfall, however, in Haslemere. The provision of dental practitioners at 1 per 1487 population is also better than the benchmark standard of 1 per 2,000.

Most Surrey residents enjoy good health and have a relatively high average life expectancy. However, the Surrey Strategic Partnership Plan recognises that childhood obesity is a significant and growing challenge; 13.2% of Surrey’s children were obese in 2007/08 when weighed in last year of primary school, targets within the plan include the provision of things to do and places to go for children and young people, particularly the vulnerable and disadvantaged. It is estimated that nearly one in five adults in Surrey is obese and is therefore significantly more likely to experience chronic illness early in life and therefore unable to contribute towards the economy. The document identifies that the county’s outdoor recreational facilities are an important factor in encouraging healthy lifestyles, and that their preservation and enhancement must be carefully balanced with the need for development. Provision of adequate sports and leisure facilities to encourage the take up of more active lifestyles should be regarded as an important component of community infrastructure.

**Sustainability Appraisal Objective 3: Improve the education and skills of the population**

Surrey County Council anticipates a rising shortfall in Primary places in Waverley during the plan period. Additional places are likely to be required for children living in Cranleigh, Milford, Witley, Farnham, West Waverley and Haslemere and Hindhead. With respect to secondary schools, there is not likely to be a significant shortfall to 2018. Additional places may be required in Farnham whilst there may be an excess in Godalming.

The Surrey Strategic Partnership Plan reports that the County’s children and young people achieve some of the best educational outcomes in the country. In 2007, 78% of young people achieved 5 or more A*-C GCSE’s (or vocational equivalent). However, some groups such as looked after children, are underachieving, 3% of the county’s young people are not in education or employment despite Surrey having one of the strongest economies in the country and 2,400 young people had not achieved a level 2 qualification or its equivalent by the age of 19. While Surrey has
above national levels of qualifications, the picture is less favourable when compared internationally. Current initiatives to develop more vocational courses and qualifications are an important recognition that skills development needs to be relevant to a specific job rather than simply focus on attainment of formal qualifications.

Higher levels of unemployment are a particular concern for rural Surrey and the county’s more deprived areas. Currently 23.5% of the county’s adult working population are without a level 2 qualification (the minimum for employability). This is a particular challenge for Surrey’s knowledge based businesses. The Strategic Partnership Plan sets out a requirement to ensure that all young people have access to high quality education and that adults and young people can make the most of opportunities for further and higher education, training and employment.

**Sustainability Appraisal Objective 4: Ensure everyone has the opportunity to live in a decent and affordable home**

The Surrey Strategic Partnership Plan highlights that residential and economic development is vital to Surrey’s continued economic and social success. The plan reports that high house prices make Surrey unaffordable for key workers, lower earners, young people and migrant groups. These groups are an important source of key labour for lower skilled industries such as retail, farming and health/social care. High house prices make it difficult to attract much needed lower paid workers to Surrey, and many that do work in Surrey commute from cheaper areas outside the county. The greater provision of affordable homes (urban and rural) would enable them to live and work in Surrey and help reduce congestion. In addition there is insufficient provision of accommodation for people with care and support needs and this pressure will be increased by an aging population.

The West Surrey Strategic Housing Market Assessment reports that there is a net annual need for 515 new affordable homes. At paragraph 19.11 it is recognized that falling household size may well indicate that an increased proportion of this will be for smaller units. The ageing population brings with it some additional problems as the increase in older person households may well require some form of specialist housing to be provided. This segment of the population is typically more likely to have health and/or mobility issues which may well impact on the types of housing choices they are able to make. In the market sector it is suggested, however, (paragraph 19.16) that there is a notable shortage of two, three and four bedroom homes. The SHMA advises that all larger sites should contain a reasonable mix of different sizes of accommodation. This would also help meet the needs of black and minority ethnic groups, families, lone parents, older persons and other special needs.

At paragraph 19.22 the SHMA comments that high incomes and incidence of owner-occupation shows the much greater dominance of households in rural areas at the higher end of the financial capacity spectrum. However, the implications of this are that more affordable housing may be required to enable less well-off households out of town and thus contribute to the creation of ‘mixed and balanced’ communities. Infrastructure is a key consideration when formulating such policies to encourage mix in rural areas. In particular, it is noted in the SHMA that rural households were more likely to find accessing public transport problematic.

The Strategic Housing Market Assessment at paragraph 18.30 identifies that accessing public transport was more of a problem for rural households, which to an extent ties into the national concerns about service infrastructure in rural areas. The
Affordable Housing Viability Study concludes at paragraph 4.1.20 that 'there is no particular reason to suggest that the viability of smaller sites is, in general, any worse or better than larger sites'.

In general resident incomes in Waverley are around 60% higher than workplace incomes. The implications of this are that many people commute to higher paid jobs outside the HMA, whilst at the same time a number of people working in the HMA will not be able to afford to reside there (paragraph 19.14) there is a clear gap between prices and incomes for many households and the clear lack of ‘cheap’ housing to buy (19.15). The Affordable Housing Viability Study concludes, however, at paragraph 4.1.20 that ‘there is no particular reason to suggest that the viability of smaller sites is, in general, any worse or better than larger sites’.

The West Surrey Gypsy and Traveller Accommodation Needs Assessment (2006) recommends that pitches are provided in Waverley.

The Employment Land Review reports that the over-riding drive of other national, regional and local policies is that in economically advantaged areas, existing or allocated employment land which is suitable for employment should be safeguarded for this purpose. It continues, stating that this approach will be particularly pertinent in Waverley (paragraph 2.6.2). The ELR does, however, identify at paragraph 2.6.4 a ‘lack of sound evidence regarding quantitative need for employment land and floorspace in the region’.

**Sustainability Appraisal Objective 5: Reduce crime, the fear of crime and antisocial activity**

The Waverley Community Strategy (superceded by Surrey Sustainable Community Strategy) identifies criminal damage and anti social behaviour as key issues to tackle, taking an approach of targeting specific areas. Farnham Castle and Godalming Central and Ockford are identified as each accounting for 10% of the total. The Cranleigh healthcheck raises fear of crime as an issue despite a low crime rate.

The Surrey Strategic Partnership Plan states that crime levels are low and Surrey Police scores highly in public satisfaction. Surrey is considered to be a county of towns and villages with good and affordable infrastructure and facilities in relation to their size. The Safer and Stronger Communities Partnership supports the development of distinctive, confident, caring, creative, and safe communities in Surrey by building on these current strengths. Despite Surrey’s affluence there are pockets of deprivation in both urban and rural communities. The public’s most significant concerns include reducing low level crime and anti-social behavior and improving road safety. Waverley is a sought after place to live and records low levels of crime compared with the Surrey average. High house prices and levels of car ownership demonstrate the affluence of the area, but this affluence can mask the areas of deprivation that exist within the borough. The Safer Waverley Partnership proposed actions include recognition of the need to focus partnership activities in certain neighbourhoods in the Borough; particularly Sandy Hill and The Chantry in Farnham and Ockford Ridge/Aaron’s Hill and Binscome in Godalming to support and empower communities.
Sustainability Appraisal Objective 6: Encourage community identity and participation

The draft Settlement Hierarchy (2010) describes the main towns, villages and other settlements in the Borough. Each settlement has a distinct identity as well as operating within the hierarchy of settlements of the Borough and beyond. Community identity is an intangible concept comprising the people living in and using the services of an area; its services and infrastructure; its townscape; and its heritage.

The Surrey Strategic Partnership Plan reports that some of the county’s communities lack a sense of local belonging and self reliance, since many people work, shop and socialise elsewhere. In addition, whilst Surrey’s rural nature is a huge asset, it can also limit access and participation, particularly by children, young people, the elderly, and those with special needs. Shrinking public resources and the loss of local amenities such as post offices, shops and other facilities exacerbate the situation. The plan supports the promotion of cultural, sporting and community activities as actions which will continue to strengthen local communities.

Sustainability Appraisal Objective 7: Ensure high and stable levels of employment

The Surrey Strategic Partnership Plan reports that Surrey has high and stable employment rates compared with other areas of the UK and indeed it supports the economic success of the country. The county benefits from high levels of skills, a high rate of business start ups and a high percentage of businesses that are knowledge based in key sectors such as creative industries and pharmaceuticals. Surrey’s economy is closely tied to that of London and the proximity of Heathrow and Gatwick Airports. Surrey’s current economic success comes at the price of congested roads, lack of infrastructure and high house prices. These problems of success may limit future economic growth if Surrey were to become a less attractive place to live and do business, especially in light of increasing competition from other high performing European and global regions.

Higher levels of unemployment are a particular concern for rural Surrey and the county’s more deprived areas. The plan recognises that the economic development of Surrey’s rural communities are different; the challenge will be to encourage and support greater economic diversification, widen access to training, employment opportunities and ICT (in particular supporting the roll out of superfast broadband in both rural and urban areas), and improving the use of community facilities for training delivery.

The draft Settlement Hierarchy (2010) at paragraph 5.20 reports that around a third of Waverley’s jobs are to be found in Farnham. High levels of out commuting are common throughout the Borough. Even in Godalming, the location of the second largest number of jobs, it is reported that of the economically active population 24% both live and work in the town with some 61% commuting out. Outside Farnham and Godalming employment is spread across the Borough with Haslemere providing about 3%. The draft Settlement Hierarchy notes that Cranleigh has a large number of people who commute out of the village.

The West Surrey Strategic Housing Market Assessment, at paragraph 19.10, finds that the area is part of a relatively open economy, of which relatively long journeys to work are a feature. It concludes that the proximity of London means that attaining the 70% self-containment threshold is unrealistic.
**Sustainability Appraisal Objective 8: Improve accessibility to services, facilities and amenities**

A key objective of land use planning is to ensure a distribution of development that will ensure good access to jobs, education and services and that supports a reduced need to travel. The benefits of this sustainable approach to transport would include reduced congestion and lower emissions, including greenhouse gases.

The Surrey Safer and Stronger Communities Partnership’s vision is of a clean, green Surrey made up of confident, distinctive, strong and self-reliant communities. A county of towns and villages with good and affordable infrastructure and facilities in relation to their size, and efficient and appropriate transport facilities providing access to key services in areas where they are not available locally. The Surrey Strategic Partnership Plan recognizes that there is a need to take a more proactive approach to maximising the value that developments delivery and to encourage high standards of appropriately mixed developments, underpinned by the infrastructure that will promote strong communities. It is recognised that access to services can be a major issue in Waverley. The Plan identifies that there is a current undersupply of services for all vulnerable adult groups in the county.

The draft Settlement Hierarchy 2010 identifies that residents in Farnham, Godalming, Haslemere and Cranleigh enjoy the best access to services. In Milford, Hindhead and Beacon Hill, Bramley, Witley, Elstead and Chiddingfold residents have good access to services, but need to travel to other settlements for the full range. Services in Alfold, Ewhurst, Churt, Shamley Green, Dunsfold, Grayswood, Tilford and Wormley are reported to be limited, with the remaining settlements in the Borough having very limited services.

The Employment land Review 2010 reports, at Section 3.8, that 49.6% of Waverley residents commute out of the Borough for work and that a substantial number of workers commute to or from Guildford, East Hampshire and Rushmoor.

**Sustainability Appraisal Objective 9: Improve the satisfaction of people with their neighbourhood as a place to live**

The Waverley Borough Place Survey 2008 reports that 86% of residents are happy with their local area as a place to live. Positive points were identified as community cohesion (National Indicator 1), belonging (NI2), good health (NI 119), low levels of antisocial behaviour (NI 17, NI 37, NI 41, and NI 42) and fair treatment by local services (NI 140). Concerns emerged with respect to support to independent living of elderly people (NI 139), police and public services dealing with antisocial behaviour (NI21). Areas where residents wished to see improvement include road and pavement repairs, traffic, activities for teenagers, public transport and affordable housing.

The Surrey Strategic Partnership Plan identifies the need to work with local people to build stronger communities as a key challenge. The partnership will take an evidence based approach whereby the strengths and weaknesses of local communities across the county will be mapped. The focus until March 2011 will be to increase the proportion of people who feel they can influence decisions in their locality (NI 4), increase overall/general satisfaction with the area (NI 5) and to improve the environment for a thriving third Sector (NI 7).
Sustainability Appraisal Objective 10: Prevent and control pollution

In 2005 Waverley declared AQMAs at the following locations

- The Borough, Farnham
- Ockford Road/Flambard Way in Godalming
- A3 crossroads in Hindhead

In all three cases the AQMAs were declared as a result of monitoring carried out in 2003 showing that levels of Nitrogen Dioxide (NO₂) in these locations would exceed the annual mean standard permitted. It is considered that in the long term improvements to engine technology, including electric vehicles, will address this issue comprehensively.

Contamination issues may arise for individual sites. Whilst Cranleigh Brickworks is a site known to be contaminated, it is more likely that contamination would arise in the four main settlements due to the history of development. Performance against this objective is largely dependent on details of the specific site location, nature, form and design of any development.

The Surrey Strategic Partnership Plan reports that car availability in Surrey is 59% above the national average and that daily traffic flows on the county’ A roads are nearly twice the national average. Most journeys to work are by car, with only 13% of Surrey’s residents commuting on public transport. The plan recognises the need to invest in transport infrastructure, encourage more sustainable modes of travel and reduce unnecessary travel such that congestion can be reduced and benefits derived for the economy, environment and people’s health.

Sustainability Appraisal Objective 11: Maintain and enhance biodiversity and soil

Waverley is largely rural and over 30% of the area is wooded. The Surrey Strategic Partnership Plan recognises the importance of Surrey’s landscape and habitats. Not only because they support biodiversity but also attract tourism and other economic sectors. Much of Surrey’s land is protected, so the land available for development is limited. However, some areas would benefit from renewal where buildings are no longer suitable and do not provide a high quality environment for the user.

The Natura 2000 sites in Waverley are: The Thames Basin Heaths Special Protection Area made up of thirteen SSSIs one of which, the Bourley and Long Valley SSSI is partly in Waverley Borough; The Wealden Heaths Phase1, made up of Thursley and Hankley and Frensham Commons SSSI which is contained in Waverley Borough; the Wealden Heath Phase 2 Special Protection Area which is made up of four SSSIs one of which is the Devil’s Punch Bowl; and the Thursley, Hankley and Frensham Commons SSSI is part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation which is also a RAMSAR site. Of the 5067ha of SSSI, only 21% are in favourable or unfavourable and recovering. When compared with the target in PPS9 for 95% by 2010, urgent action is required on most sites. In addition there is a relatively large area of 9695ha of ancient woodland.
There is a particular issue of the potential impact on European sites: Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). For example, there is specific guidance on avoiding or mitigating the potential impact on the Thames Basin Heaths SPA, linked to the proximity of housing development to the SPA. Much of the Farnham area is within the zone of influence of the Thames Basin Heaths SPA. It is reasonable to assume at this stage, however, that appropriate mitigation measures will be possible to facilitate development in existing urban areas that lie within 5km of an SPA or SAC for Thames Basin Heaths. There may be a requirement to provide avoidance measures or to demonstrate no significant effect in other areas.

The Surrey Habitat action plans identify the creation of the following as important to biodiversity in the County: chalk grassland, marsh habitat, lowland heath, neutral and dry acid grassland, woodland, ancient woodland, wood pasture and parkland, heathland, urban biodiversity.

On the strategic level all the options could potentially have a negative impact on biodiversity. The significance of the impact and ability to mitigate will depend on the specific site location in relation to areas of ecological interest.

**Sustainability Appraisal Objective 12: Maintain and enhance the quality of landscapes and townscapes**

The Surrey Hills AONB (which is of national environmental importance) lies within the Borough and is a key landscape feature. The AGLV (Area of Great Landscape Value) is a County-wide environmental designation. The Borough also contains Local environmental designated landscapes e.g. the ASVI (Area of Strategic Visual Importance) and the Farnham/Aldershot Strategic Gap.

Within the developed area there are the various Areas of Special Environmental Quality (ASEQ) as well as the Low Density Residential Areas policy BE6. In addition there are 45 Conservation Areas and individual Listed Buildings. Areas of open space further enhance the urban area.

National planning policy requires the maintenance of the Green Belt and making the best use of previously developed land, open space and green space. “Surrey Design” (published by Surrey County Council in 2002) is an important guidance document aimed at ensuring that new development is of high quality and complimentary to the townscape, particularly Conservation Areas and Listed Buildings.

Depending on which broad option is preferred, there will need to be further work to assess specific locations taking account of all constraints. In terms of locations within settlements, impact is partly dependent on the broad location within the settlement and also the detailed location, amount, form and design. For all urban options development meeting design guidance should be capable of improving and enhancing the quality of an area.

**Sustainability Appraisal Objective 13: Conserve and enhance the historic environment**

Key elements of the historic environment of Waverley are 45 Conservation Areas and over 1600 individual Listed Buildings, with a further 17 Historic Parks and Gardens,
Sustainability Appraisal Report
Appendix 1

23 Ancient Monuments and 12 sites of archaeological importance. All new development would be required to ensure that heritage interests are protected.

Sites identified through the process of producing a Strategic Housing Land Availability Assessment include some locations within settlements that are within or close to heritage assets. Developing these sites would not necessarily adversely affect these interests, since this would be dependent on form and design.

**Sustainability Appraisal Objective 14: Reduce vulnerability to climate change, especially flooding**

Waverley is not subject to regular severe flooding, but it has Zone 2 and 3 flood areas along all the branches of the River Wey, amounting to 7% of the Borough area. Much of the flood risk in Waverley is fluvial relating to the main Rivers and their main tributaries. Flood risk also exists from Ordinary Watercourses, overland flow and in capacity in foul and surface water sewers and highway drainage.

The Environment Agency predicts that flood events are likely to become more common. Design guidance is set out in Surrey Design and the Code for Sustainable Homes, including the use of sustainable drainage, open space and measures to reduce the rate of run off will be essential to addressing this. In addition, buildings should also be designed to cope with extremes of temperature.

The Strategic Flood Risk Assessment was published in 2010 and identified that general flood risk is greatest from rivers and from surface water. River flooding affects parts of Bramley, Chiddingfold, Cranleigh, Farnham, Godalming and Haslemere. Surface water flooding affects parts if Badshot Lea, Bramley, Chiddingfold, Churt, Cranleigh, Ellen’s Green, Ewhurst, Farnham, Frensham, Godalming, Hambledon, Haslemere, Milford, Rowledge, Rushnoor, Shottermill, Upper Vale and Weybourne. Potential also exists for groundwater flooding in Upper Hale, Godalming, Elstead, Churt, Shottermill, Wormley, Witley, south of Busbridge and Cranleigh. A residual risk exists form reservoirs and the Wey and Arun Canal. The SFRA recommends that land use planning should take flood risk into account when considering development in these areas and where key transport routes are affected.

Initial consideration of the findings of the Strategic Housing Land Availability Assessment suggest, however, that sufficient sites would be available in and around the main urban areas to deliver the required housing without using land at risk of flooding.

The Surrey Strategic Partnership Plan recognises a need to encourage more developments that are not only aesthetically pleasing but also environmentally sustainable (incorporating design to withstand the predicted impacts of climate change).

**Sustainability Appraisal Objective 15: Use energy, water and other natural resources efficiently and minimise carbon emissions so as to address the causes of climate change**

A key principle of sustainable development is to manage resources more efficiently. Waste management is on a County wide basis. The Surrey Waste Plan recognises that waste has increased historically at a rate of 3% in general. A key objective is, therefore, to reduce the amount of waste produced; reuse materials; and increase
the level of recycling and composting. The South East has been identified as an area of serious water stress. The use of measures to reduce demand for clean water are fundamental to sustainable development in Waverley. The Climate Change 2008 Act and Energy Act 2008 set targets for the reduction of CO₂ emissions and the increase in the installation of renewable energy capacity.

Current statistics demonstrate that the south east has a higher environmental footprint than the national average. The Surrey Strategic Partnership Plan states that the carbon footprint of the south east region is approximately 14% above the national average. The partnership’s target is to reduce carbon dioxide emissions by 10% per capita over the next three years (NI 186). The county’s daily water consumption is 180 litres per person compared to a national average of 129 litres, and water companies in the south east expect household demand to increase by about 20% by 2030. In 2004, the average Surrey household waste generated 565.2kg of waste against a national average of 439.1kg. Initiatives to reduce the amount of residential waste going to landfill have had a positive impact; in 2001 only 17.9% of household waste was being recycled and composted, in 2008-09 this had increased to nearly 40%. The county has a target to achieve 60% by 2025 (NI 192) and there is an ambition to achieve zero growth in household waste (currently at 1% per annum) by 2025 at the latest. Surrey’s businesses produce over one million tonnes of waste every year.

Car availability in Surrey is 59% above the national average, and daily traffic flows on the county’s A roads are nearly twice the national average. However there is evidence that the rate of traffic growth is slowing compared to national averages; between 2006 to 2007 traffic on all roads in Surrey increased by only 0.3% compared to an increase of 1.3% nationally.

Potential impacts arise both from the location of development, which has implications for transport; the size/form of development, which has implications for the materials used; and the performance of the building/use. Planning is only part of the solution, however, since much is dependent on lifestyle choices. Some of the benefits of planning policy may also be relatively short term as there is a national target for all new homes being zero carbon, irrespective of location, by 2016.

The Surrey Local Transport Plan, at paragraph 2.4.48, considers that the key transport related issues are limiting traffic growth and improving engine technology.

**Sustainability Appraisal Objective 16: Encourage sustained economic growth**

The SA Scoping Report identifies the availability of labour, infrastructure and transport as three key elements in maintaining a sustainable economy. The Annual Monitoring Report identifies a high level of micro business’ in the Borough and that in Surrey it is second only to Reigate in terms of the number of business’.

The Employment Land Review concludes that the role of Waverley is predominantly as a rural location and that environmental quality is a further key element in maintaining a prosperous economy. It also stresses the importance of enhancing the vitality and viability of existing urban centres (paragraph 6.2).

The Employment Land Review estimates that during the life of the plan 46,000sqm of additional employment floorspace would be needed, of which 21,000sqm could be provided on existing sites. This assumes growth in housing at the level of option 1. It
may be necessary to revisit the evidence/assumptions in the ELR taking account of any change to the planned level of housing growth.

The Surrey Strategic Partnership Plan recognises that residential and economic development is vital to Surrey’s continued economic and social success. In particular there is a need for more affordable homes to retain and attract families and key workers. The current recession has had a negative impact on house building in Surrey, with housing development slowing considerably since late 2008. The impact of recession on the provision of housing and commercial development is expected to be felt for some time.

Around 250 global businesses, covering a broad range of sectors, are located in the county. Business location decisions are underpinned by access to a skilled workforce, good transport links and the proximity of clients and suppliers. Surrey has some 70,000 business and an estimated 60,000 (85%) of these are Small to Medium-size Enterprises (SMEs). Within Waverley the majority of businesses employ less than 10 people and many people commute out of the borough to places of work such as London. The Plan recognises the need to provide enough high quality employment land and a range of sites suitable for a broad range of commercial uses whilst maintaining Surrey’s high quality landscapes and countryside. Mixed use developments in appropriate locations are recognised as being useful in helping alleviate competing pressures on available land as well as helping to support more sustainable lifestyles by reducing the need to travel. To continue to attract business/inward investment the challenges of skills shortages, the retention of a skilled workforce and affordable housing must be addressed.

The SA Scoping Report identifies that companies in the Borough can experience problems in finding people to fill vacancies and may rely on employees commuting in to the Borough. Equally, the good transport links to London enables Waverley residents to travel to opportunities in London Boroughs. Matching skilled workers with local jobs is, therefore, a key issue in tackling local unemployment. The provision of affordable housing is an important element in helping house the required number of skilled workers in the Borough (see SA Objective 3).

**Sustainability Appraisal Objective 17: Enhance the image of the Borough as a business location**

The Annual Monitoring Report identifies a high level of micro business' in the Borough and that in Surrey, Waverley is second only to Reigate in terms of the number of business'.

The Employment Land Review concludes that the role of Waverley is predominantly as a rural location and that environmental quality is a further key element in maintaining a prosperous economy. It also stresses the importance of enhancing the vitality and viability of existing urban centres (paragraph 6.2).

**Sustainability Appraisal Objective 18: Encourage efficient patterns of movement**

The Surrey Strategic Partnership Plan identifies that the need to travel around the county in a quick and efficient manner is essential to economic success and that convenient transport depends on uncongested roads and good public transport
services. Therefore there may be a need to encourage more sustainable modes of travel and the reduction of unnecessary travel. The county’s towns and villages should have good and affordable infrastructure and facilities in relation to their size with efficient and appropriate transport facilities providing access to key services in areas where they are not available locally.

Access to services and facilities is best in the four main towns, with a number of smaller settlements enjoying good accessibility. Access to services and facilities is poor in some rural areas where residents often rely on the car. Pockets of deprivation may exist where households don’t have access to a car and this coincides with a poor level of public transport. The AMR indicates a high level of commuting both into and out of the Borough. Whilst access to rail services is good, this represents a substantial number of vehicle movements. A better match of local skills to local jobs would help improve this situation, although the lure of well paid jobs in London and Guildford would remain.

The objectives identified in the Surrey Local Transport Plan align with the national priorities of tackling congestion; delivering accessibility; safer roads and better air quality; and related quality of life issues. In the Borough the A3 at Hindhead has known congestion and an air quality issue with respect to emissions of NOx from vehicles. The Borough, Farnham and Ockford Road/Flambard Way in Godalming have also been designated Air Quality Management Areas for NOx. The SLTP2 also reports that the Godalming and Farncombe Community transport planning initiative has helped to develop further the concept of community travel plans, where transport planning activity units with other community participation exercises to deliver an agreed programme of transport improvements. Work being carried out includes measures to improve access for pedestrians to Godalming and Farncombe town centres and the addition of new cycle facilities in the area.

**Sustainability Appraisal Objective 19: Encourage development of a sustainable tourism sector**

Waverley is a beautiful borough. It is largely rural and over 30% of the area is wooded. 80% of the areas of countryside is designated as an Area of Outstanding Natural Beauty (AONB) and/or Great Landscape Value. It is estimated that there are around 2.33m day trips to Waverley every year, contributing £54m to the economy. Good infrastructure, access to services, heritage and a high quality natural and built environment are key elements in retaining tourism. The Surrey Strategic Partnership Plan recognises the need to develop the visitor economy sector, with a focus on visitor attractions and business stays.
Appendix 2: Appraisal
Levels of growth

Option 1  a number based on the South East Plan. This would be in the region of 230 to 250 dwellings per year

Option 2  a number based on an estimate of land available to build homes on. This would be informed by the SHLAA and in the region of 150 to 200 dwellings per year

Option 3  a number based on the need and demand for homes in Waverley. This would be informed by the Strategic Housing Market Assessment, which is informed by Housing Needs Assessment, projections for growth provided by the Office of National Statistics; and the Waverley Borough Council Housing Needs Register. The figure would be in the region of at least 300 dwellings per year.

Sustainability Appraisal Objective 1: Reduce Poverty and Social Exclusion

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<tbody>
<tr>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to services, facilities and employment. Sites around the villages could be released to meet local need.</td>
<td>?</td>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to services, facilities and employment. Sites around the villages could be released to meet local need.</td>
<td>?</td>
<td>Whilst positive in that all housing need would be met and largely in the four main settlements, that aspect of poverty is considered under SA Objective 4.</td>
<td>?</td>
</tr>
<tr>
<td>If the figure was not high enough to meet housing need this may result in people seeking accommodation outside the Borough, but not necessarily remotely from services and employment. This level of growth may require policy that ensures the provision of services and/or public transport with development.</td>
<td>?</td>
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### Sustainability Appraisal Objective 2: Improve the health of the population

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<tbody>
<tr>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to services, facilities and employment. Sites around the villages could be released to meet local need.</td>
<td>?</td>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to services, facilities and employment. Sites around the villages could be released to meet local need.</td>
<td>+</td>
<td>Whilst meeting housing need would support health objectives, it is likely that some development sites may be more remote from the main service centres.</td>
<td>?</td>
</tr>
<tr>
<td>If the figure was not high enough to meet housing need this may result in people seeking accommodation outside the Borough, but not necessarily remotely from services and employment. This level of growth may require policy that ensures the provision of services and/or public transport with development if an urban extension(s) were necessary.</td>
<td></td>
<td></td>
<td></td>
<td>This level of growth may require policy that ensures the provision of services and/or public transport with development. This would be particularly significant if a new free standing settlement were necessary to accommodate numbers of houses.</td>
<td></td>
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<tr>
<td>This level of growth may require a higher proportion of affordable housing to ensure that need is met; and that policy seeks to ensure that service provision is improved to match increased population.</td>
<td></td>
<td></td>
<td></td>
<td>For all options design should seek to maximise health benefits/opportunities.</td>
<td></td>
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<tr>
<td>For all options design should seek to maximise health benefits/opportunities.</td>
<td></td>
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### Sustainability Appraisal Objective 3: Improve the education and skills of the population

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<tbody>
<tr>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to education and employment in and outside the Borough. May require that policy seeks to ensure incremental provision to match increased population.</td>
<td>+</td>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to education and employment in and outside the Borough. May require that policy seeks to ensure incremental provision to match increased population.</td>
<td>+</td>
<td>It is likely that some development sites may be more remote from the main education centres inside and outside the Borough. If large development(s) were outside the main settlements this may require that policy seeks to ensure provision to match increased population.</td>
<td>?</td>
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</table>
Sustainability Appraisal Objective 4: Ensure everyone has the opportunity to live in a decent and affordable home

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<tbody>
<tr>
<td>May not meet all need. This level of growth may require a higher proportion of affordable housing to ensure that need is met. May also be necessary to direct some development to rural areas to meet need.</td>
<td>?</td>
<td>May not meet all need. This level of growth may require a higher proportion of affordable housing to ensure that need is met. May also be necessary to direct some development to rural areas to meet need.</td>
<td>-</td>
<td>Strongly positive option since all need could be met.</td>
<td>++</td>
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Sustainability Appraisal Objective 5: Reduce crime, the fear of crime and antisocial activity

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<tr>
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<tbody>
<tr>
<td>No option is likely to perform better than any other with respect to addressing crime and the fear of crime since it is largely a matter of the detailed form and design of development.</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to addressing crime and the fear of crime since it is largely a matter of the detailed form and design of development.</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to addressing crime and the fear of crime since it is largely a matter of the detailed form and design of development.</td>
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Sustainability Appraisal Objective 6: Encourage community identity and participation

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<tbody>
<tr>
<td>Would support existing communities, but more likely to require the creation of new communities either as urban extensions and/or free standing settlement(s). Likely to be more difficult to ensure strong community identity and participation in the short to medium term.</td>
<td>?</td>
<td>Would support existing communities.</td>
<td>+</td>
<td>More likely than other options to require the creation of new communities either as urban extensions and/or free standing settlement(s). Likely to be more difficult to ensure strong community identity and participation in the short to medium term.</td>
<td>?</td>
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Sustainability Appraisal Objective 7: Ensure high and stable levels of employment

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<tbody>
<tr>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to employment both within and outside the Borough. This level of growth may require a higher proportion of affordable housing to ensure that need is met.</td>
<td>+</td>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to employment both within and outside the Borough. This level of growth may require a higher proportion of affordable housing to ensure that need is met.</td>
<td>+</td>
<td>It is likely that some development sites may be more remote from the main employment centres within and outside the Borough. Employees in these locations may be less flexible.</td>
<td>?</td>
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</table>
Sustainability Appraisal Report
Appendix 2

Sustainability Appraisal Objective 8: Improve accessibility to services, facilities and amenities

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<thead>
<tr>
<th>Option 1</th>
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<tbody>
<tr>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to services, facilities and employment. Sites around the villages could be released to meet local need. May require that policy seeks to ensure incremental provision to match increased population.</td>
<td>?</td>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to services, facilities and employment. Sites around the villages could be released to meet local need. May require that policy seeks to ensure incremental provision to match increased population.</td>
<td>+</td>
<td>It is likely that some development sites may be more remote from the main service centres. If large development(s) were outside the main settlements this may require that policy seeks to ensure provision to match increased population.</td>
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Sustainability Appraisal Objective 9: Improve the satisfaction of people with their neighbourhood as a place to live

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<tbody>
<tr>
<td>No option is likely to perform better than any other with respect to addressing the quality of a neighbourhood since it is largely a matter of the detailed nature, form and design of development. It will also depend on the overall amount and concentration of development and linked issues such as the availability of infrastructure and services to support any increase in population arising from new housing development.</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to addressing the quality of a neighbourhood since it is largely a matter of the detailed nature, form and design of development. It will also depend on the overall amount and concentration of development and linked issues such as the availability of infrastructure and services to support any increase in population arising from new housing development.</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to addressing the quality of a neighbourhood since it is largely a matter of the detailed nature, form and design of development. It will also depend on the overall amount and concentration of development and linked issues such as the availability of infrastructure and services to support any increase in population arising from new housing development.</td>
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Sustainability Appraisal Objective 10: Prevent and control pollution

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<tbody>
<tr>
<td>An inherently positive element is that development is more likely to be accommodated where best access to services, facilities and public transport exists. This would bring the related benefit of lessening the need to travel by car and lessen the attendant pollution from vehicles.</td>
<td>?</td>
<td>An inherently positive element is that development is more likely to be accommodated where best access to services, facilities and public transport exists. This would bring the related benefit of lessening the need to travel by car and lessen the attendant pollution from vehicles.</td>
<td>?</td>
<td>This option is most likely to require sites with higher densities and sites in previously undeveloped areas and, possibly, remote from the main service centres. Whilst impact would partly depend on what services are provided to support the development</td>
<td>-</td>
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</table>
There is an increased likelihood, however, of the need to develop at a higher density, which could lead to increased traffic congestion and/or the need to use greenfield sites. Some development sites may be more remote from the main service centres. May require that policy seeks to ensure incremental provision to match increased population.

A balance is needed to ensure that congestion does not increase to such an extent that it exacerbates the existing problems in the Air Quality Management Areas and that other areas do not experience a decline in air quality. This issue will rely on sustainable transport, but will partly be resolved by engine technology.

Sustainability Appraisal Objective 11: Maintain and enhance biodiversity and soil

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<tbody>
<tr>
<td>Much of the Farnham area lies within the zone of influence of the Thames Basin Heaths SPA. Sub regional guidance on avoiding or mitigating the potential impact on the Thames Basin Heaths SPA would need to be met for all options. The specific impact on biodiversity will be dependent on which sites come forward.</td>
<td>?</td>
<td>Much of the Farnham area lies within the zone of influence of the Thames Basin Heaths SPA. Sub regional guidance on avoiding or mitigating the potential impact on the Thames Basin Heaths SPA would need to be met for all options. The specific impact on biodiversity will be dependent on which sites come forward.</td>
<td>?</td>
<td>Much of the Farnham area lies within the zone of influence of the Thames Basin Heaths SPA. Sub regional guidance on avoiding or mitigating the potential impact on the Thames Basin Heaths SPA would need to be met for all options. The specific impact on biodiversity will be dependent on which sites come forward.</td>
<td>?</td>
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Sustainability Appraisal Objective 12: Maintain and enhance the quality of landscapes and townscales

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<tbody>
<tr>
<td>More likely than Option 2 to require high density development and/or the use of greenfield sites. Not only would this put designated locations, including the AONB, at risk, but also areas of outside settlements that</td>
<td>?</td>
<td>The level of growth would be based on capacity within settlements. Development management criteria would be required to clarify how development can be brought forward that</td>
<td>++</td>
<td>Most likely to require high density development and/or the use of greenfield sites. Not only would this put designated locations, including the AONB, at risk, but also areas of outside settlements</td>
<td>-</td>
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</tbody>
</table>
are designated as countryside in the Local Plan. A higher target could add further pressure within settlements for higher density development. This could have an adverse impact on townscape character.

would enhance local character.

that are designated as countryside in the Local Plan. A higher target could add further pressure within settlements for higher density development. This could have an adverse impact on townscape character.

Sustainability Appraisal Objective 13: Conserve and enhance the historic environment

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<tbody>
<tr>
<td>For all options a strong policy will be required to ensure development is compatible with heritage interests.</td>
<td>?</td>
<td>For all options a strong policy will be required to ensure development is compatible with heritage interests.</td>
<td>?</td>
<td>For all options a strong policy will be required to ensure development is compatible with heritage interests.</td>
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Sustainability Appraisal Objective 14: Reduce vulnerability to climate change, especially flooding

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<tbody>
<tr>
<td>For all options a strong policy will be required to ensure development is compatible with flood risk. A higher level of growth is more likely to lead to incompatibility with flood risk objectives.</td>
<td>?</td>
<td>For all options a strong policy will be required to ensure development is compatible with flood risk. A higher level of growth is more likely to lead to incompatibility with flood risk objectives.</td>
<td>?</td>
<td>For all options a strong policy will be required to ensure development is compatible with flood risk. A higher level of growth is more likely to lead to incompatibility with flood risk objectives.</td>
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Sustainability Appraisal Objective 15: Use energy, water and other natural resources efficiently and minimise carbon emissions so as to address the causes of climate change

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<tbody>
<tr>
<td>Some development would be likely to be accommodated in the four main settlements. This would be compatible with good access to services, facilities and public transport, thus lessening the need to travel by car and minimising energy use and associated emissions. Offers potential for community energy and improved energy efficiency in existing and new buildings due to the mix and concentration of uses. Increased likelihood that Greenfield sites would be required. Not only would</td>
<td>?</td>
<td>Most development could be accommodated in the four main settlements. This would be compatible with good access to services, facilities and public transport, thus lessening the need to travel by car and minimising energy use and associated emissions. Offers potential for community energy and improved energy efficiency in existing and new buildings due to the mix and concentration of uses.</td>
<td>+</td>
<td>Some development would be likely to be accommodated in the four main settlements. This would be compatible with good access to services, facilities and public transport, thus lessening the need to travel by car and minimising energy use and associated emissions. Offers potential for community energy and improved energy efficiency in existing and new buildings due to the mix and concentration of uses. Increased likelihood that Greenfield sites would be required. Not only would</td>
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Sustainability Appraisal Objective 16: Encourage sustained economic growth

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<tbody>
<tr>
<td>More likely than Option 2 to meet the need for key worker housing. This level of growth may require a higher proportion of affordable housing to ensure that need is met. May also be necessary to direct some development to rural areas to meet need.</td>
<td>?</td>
<td>This level of growth risks not providing sufficient housing numbers to accommodate key workers. This could prevent the economy from being able to source reliable local employees. May require a higher proportion of affordable housing to ensure that need is met. May also be necessary to direct some development to rural areas to meet need. A lack of affordable housing in the Borough may lead to increased commuting. One of the main issues would be the provision of key worker and other affordable housing.</td>
<td>-</td>
<td>The most likely option to provide sufficient numbers of housing for key workers. Increased likelihood that a Greenfield site would be required outside the main centres. The location is more likely to be remote from the transport hubs which could necessitate additional travel for workers and service providers, adding further congested to the highway network (see baseline for SA Objective 18).</td>
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Sustainability Appraisal Objective 17: Enhance the image of the Borough as a business location

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</thead>
<tbody>
<tr>
<td>No option is likely to perform better than any other with respect to the image of the Borough since it is largely a matter of the detailed form and design of development. The importance of design guidance is noted for policy appraisal.</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to the image of the Borough since it is largely a matter of the detailed form and design of development. The importance of design guidance is noted for policy appraisal.</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to the image of the Borough since it is largely a matter of the detailed form and design of development. The importance of design guidance is noted for policy appraisal.</td>
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Sustainability Appraisal Objective 18: Encourage efficient patterns of movement

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<tbody>
<tr>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to services, facilities and employment. Sites around the villages could be released to meet local need. If more remote sites were needed access to</td>
<td>?</td>
<td>Positive in that the four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would provide the focus for development, thus maximising accessibility to services, facilities and employment. Sites around the villages could be released to meet local need. If the figure was not high enough to meet housing</td>
<td>?</td>
<td>The level of growth would require more dense development or would require the use of Greenfield sites. Greater density could lead to congestion unless there was commensurate investment in public transport. If more remote sites were needed access to services, facilities and</td>
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services, facilities and employment may be poor. This may lead to an increased need to travel by private car.

If the figure was not high enough to meet housing need this may result in people seeking accommodation outside the Borough, but not necessarily remotely from services and employment.

This level of growth may require a higher proportion of affordable housing to ensure that need is met; and that policy seeks to ensure that service provision/public transport is improved to match increased population. May also be necessary to direct some development to rural areas to meet need.

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<tr>
<td>need this may result in people seeking accommodation outside the Borough, but not necessarily remotely from services and employment.</td>
<td>employment may be poor. This may lead to an increased need to travel by private car.</td>
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Sustainability Appraisal Objective 19: Encourage development of a sustainable tourism sector

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</thead>
<tbody>
<tr>
<td>A proportion of the development would be likely to be within the main settlements. The potential for additional workers to live in the Borough may support the tourism industry.</td>
<td>?</td>
<td>A focus on development in existing urban areas and near to most facilities and heritage interests is likely to maximise the opportunities for employers, workers and visitors. A lack of affordable housing in the Borough may lead to increased in commuting. One of the main issues would be the provision of key worker and other affordable housing.</td>
<td>?</td>
<td>A proportion of the development would be likely to be within the main settlements. The potential for additional workers to live in the Borough may support the tourism industry.</td>
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</table>
Issues and Options (Topic Papers February 2009)

Background and methodology

The consultation Sustainability Appraisal Report issued with the Topic Papers provided an account of the key sustainability issues associated with options presented in the Core Strategy Consultation papers:

1. Appraisal of Core Strategy Objectives

An appraisal of Core Strategy Objectives has been undertaken and this has identified the inherent tensions that exist between the objectives of protecting biodiversity, landscape and amenity whilst delivering the required housing, employment land, infrastructure and facilities.

This exercise also provides an initial impression of some of the more detailed issues that need to be considered and addressed.

2. Key Issues for Sustainability Appraisal

The issues and priorities to be addressed in Sustainability Appraisal are being informed by various documents that will comprise the evidence base; by consultation responses to date; and by other factors such as relevant national, regional and local planning policies.

The Sustainability Appraisal Scoping Report considers environmental, social and economic data and identifies key issues across the Borough. The Hierarchy of Settlements supplements this by providing background information about the suitability for development of specific towns and villages in the Borough and can be considered part of this evidence base. As a further exercise in setting the context for sustainability appraisal, the application of the principles of the hierarchy has been appraised.

It is considered that the application of a hierarchy of settlements is likely to maximise accessibility to services, facilities and employment for the most densely populated areas of the Borough. This would facilitate addressing deprivation where most acute, namely Godalming Central, Godalming Binscombe and Ockford, which have lower income and skills compared with other areas of Surrey. There is a risk, however, that social exclusion in more remote and smaller settlements may not be addressed.

It is likely that the approach would generally avoid harm to the most sensitive habitats, although flood risk and avoiding impacts on the SPA may limit development opportunities. With a focus on existing urban areas, conflict may be more common with respect to heritage interests and more flexibility may be necessary with respect to tourism and the rural economy.
3. Town and Country Topic Paper

Housing Issue TC1 – How many new homes should we plan for?

The amount of housing in either option provides an opportunity to address deprivation in Godalming Central, Godalming Binscombe and Ockford, which have lower income and skills compared with other areas of Surrey and to address health issues. Similarly, either option could be used to address issues in more remote and smaller settlements. The scope would be greater, however, with Option TC1b.

Both options provide an opportunity to improve public transport across the Borough, strengthen rural communities and meet affordable housing need. Again, Option B offers greater potential.

The greater amount of housing proposed in TC1b is, however, more likely to result in a conflict of interest with respect to environmental constraints. For both options strong and clear policy criteria are necessary to protect biodiversity and soils, ensure enhancement of habitats, protect landscapes and townscapes, Conservation Areas, individual Listed Buildings and areas of open space in the urban area, Historic Parks and Gardens, Ancient Monuments, sites of archaeological importance, and areas of highest risk of flooding.

Housing Issue TC2 – Where should new homes be built?

Development within towns and villages only (Option TC2a) would be likely to avoid impacts on the most sensitive landscapes and habitats and maximise accessibility to services, facilities and employment for the most densely populated areas of the Borough.

This would facilitate addressing deprivation where most acute, namely Godalming Central, Godalming Binscombe and Ockford, which have lower income and skills compared with other areas of Surrey. There is a risk, however, that social exclusion in more remote and smaller settlements may not be addressed; and that the issues of flood risk and avoiding impacts on the SPA may limit development opportunities. There may also be fewer opportunities to consolidate and stimulate the rural economy. A degree of flexibility could be introduced in this respect, possibly including sustainable tourism that would further objectives of the AONB Management Plan.

With a greater amount of development in existing urban areas and, possibly, the need for higher densities, conflict is also likely with respect to heritage interests and the wider townscape and local character. The extent of impact may be controlled by robust policies on layout and density and by character assessment.

Option TC2b (some development on the edge of larger settlements) would have similar attributes and impacts with respect to sustainability, but may offer opportunities to avoid conflict with environmental constraints including flood risk, important habitats, Conservation Areas, individual Listed Buildings and areas of open space, Historic Parks and Gardens, Ancient Monuments and sites of archaeological importance. Whilst conflict with landscape designations could be avoided, pressure may exist to develop on valuable landscapes with no designation. Option TC2b would be, therefore, highly compatible with the options that promote a character assessment approach to protecting the landscape.

Option TC2c (some development on the edge of settlements of any size) could lead to adverse impacts on the landscape if not strictly controlled in terms of the volume of housing allowed. Too much development in rural areas, particularly smaller settlements, may also have detrimental impacts in terms of accessibility to services and,
consequently, lead to congestion, air pollution and unsustainable transport patterns. If

Option TC2c were to retain the overall focus on the higher order settlements, but allow
exceptions where this could improve the sustainability attributes of the Core Strategy.
Exceptions criteria to be met could include:

- known social inclusion issues
- known health issues
- improving access to key services and education in the rural area
- meeting affordable housing need
- avoiding harm to important habitats, Conservation Areas, individual Listed
  Buildings, areas of open space, Historic Parks and Gardens, Ancient Monuments
  and sites of archaeological importance avoiding flood risk

A new settlement (TC1d) would need to be equivalent to at least the whole South East
Plan target for the Borough in order to be self sufficient. Whilst this could potentially
prove sustainable in the long term within its own context, in the short and medium term
residents in the new settlement may need to travel further for services. The overall long
term impact on the Borough is likely to be negative since a development of 5 to 10 000
properties in a new settlement would leave little scope to improve or consolidate the
services in existing communities and the need to travel by car is likely to increase. A new
settlement is likely, therefore, to lead to social isolation, poor access to services and
facilities, including education. Option TC2d would require substantial investment in public
services and public transport to try and address these issues.

A new settlement could address specific issues in the vicinity and, due to the large
volume of housing, offers a potentially cost effective way to meet the need for affordable
housing. A new settlement could also provide a catalyst for employment, although the
negative effect on existing employment/business could be more substantial than the
benefit, particularly in the short to medium term.

A new settlement could prove a sustainable choice if it worked to consolidate existing
settlement patterns, particularly if it could make a substantial contribution to sustainable
transport. It would also need to offer a better option in terms of impact on the Surrey Hills
AONB, Farnham/Aldershot Strategic Gap, and the AGLV; reducing pressure on
Conservation Areas, character areas, individual Listed Buildings, areas of open space,
Historic Parks and Gardens, Ancient Monuments and sites of archaeological importance;
and flood risk. It is likely, however, to be difficult to find a site that did not affect one of
these interests. Irrespective of designations, a new settlement would have a substantial
impact on the landscape in which it were set.

There are substantial concerns in terms of the impacts of a new settlement, but there are
potential benefits. In addition to all the criteria for benefits being met, a new settlement is
only likely to perform well in sustainability terms if good accessibility and compatibility
with existing social and economic patterns can be demonstrated and that the highest
level possible of the Code for Sustainable Homes could be achieved.

**Housing Issue TC3 – Should the Council include an allowance for ‘windfall sites’ in its
overall housing strategy?**

Whilst a planned approach is more likely to avoid harm and deliver planned and co-
ordinated benefits, not allowing windfalls may increase the likelihood that greenfield sites
may be required to meet development needs.

Conversely, windfalls (Option TC3a) offer less scope to deliver planned and co-ordinated
benefits, although some sites may be more compatible with avoiding harm to landscape
and to the most important habitats. If the option were taken forward, criteria could include measures and contributions that would:

- Address social inclusion issues
- Address health issues
- Improve access to key services and education
- Meet affordable housing need
- Avoid harm to important habitats, Conservation Areas, individual Listed Buildings, areas of open space, Historic Parks and Gardens, Ancient Monuments and sites of archaeological importance
- Avoid flood risk
- Meet Level 4 of the Code for Sustainable Homes now and Level 5 and Level 6 by specified dates

There may be merit in allowing some windfall when these and other specific criteria can be met.

**Housing Issue 4 – Should the Council seek to control the amount of unplanned housing that comes forward?**

A planned approach to allowing windfall sites (TC4b) would be more likely to deliver planned and co-ordinated benefits than no control over the release of unplanned windfalls (TC4a). If Option TC4b were taken forward policy criteria could be included that would ensure the protection of green space including garden land; require the avoidance of impacts on important habitats and a high level of benefits to biodiversity; avoidance of impacts on landscape and design appropriate to the character of the area/the historic environment; meeting the sequential test of PPS25, if necessary, and achieving a higher than normal level of the Code for Sustainable Homes; good access and a travel plan.

The strategy could link to policy with respect to contributions to infrastructure and affordable housing. In this way, the strategy would enable sites that are meet sustainability criteria could come forward.

**Community Needs Issue TC5 – How can the Local Development Framework support the delivery of infrastructure and services?**

The Town and Country Topic Paper presents no options. Appraisal has considered what criteria and issues might be relevant. In addition to the comments below it is recognised that evidence will be required to identify priorities and that priorities may vary across the Borough.

The provision of adequate infrastructure is essential to investment and sustained economic growth. Policy would, however, need to be flexible to ensure that in requiring contributions from developers there would be no adverse impact on the provision of housing and affordable housing or commercial development as a result of the cost implications.

Requiring improvements to and provision of transport, foul water, sewerage, energy and waste collection infrastructure are essential elements of sustainable development, preventing pollution and addressing the causes and consequences of climate change. More specifically, SUDS should be required where viable. The impact of renewable energy technologies could be significant in terms of impact on the landscape and heritage. It may be beneficial to produce an energy strategy to clarify the criteria and circumstances where particular technologies would be appropriate. Requiring the provision of green space and recreation services/facilities would support health objectives.

The Community Strategy for Surrey requires particular strengthening of the provision for
young, vulnerable and disadvantaged, strengthening of the provision for adequate health care in the home and would also be supported by requiring an improvement in the skills match between residents and available employment. The latter would support sustained economic growth, reduced need to travel and community cohesion. Improving communications technology may be particularly important in rural areas.

4. Living and Working Topic Paper

Housing Issue H1 – What should the site size threshold be for requiring a proportion of affordable housing?

Current thresholds (Option H1A) are not delivering sufficient affordable housing and this can lead to unsuitable housing in terms of price and location, including the need to locate outside the Borough and commute in, to the detriment of social inclusion, health and the availability of labour.

Whilst the majority of affordable housing is being provided in the most accessible locations, communities in smaller settlements may be less balanced due to the need for younger people to move away. The Spatial Portrait indicates that the Borough has a relatively old population, making this an important issue.

Lowering the threshold (Option H1B) is likely to increase total provision, but viability of small developments may become an issue. The flexibility offered by Option C in removing the threshold and applying a sliding scale of contributions is the most likely to maximise the volume of affordable housing delivered. Policy would be most effective if exceptions where abnormal costs affect viability were identified and appropriate contributions/delivery negotiated.

Housing Issue H2 – Should the Council increase the amount of affordable housing required on development sites?

• Option A: Keep the existing percentage set out in the adopted Waverley Borough Local Plan 2002 required on sites; or
• Option B: Increase the percentage required on sites from that set out in the adopted Waverley Borough Local Plan 2002

Current percentages (Option H2A) are not delivering sufficient affordable housing and this can lead to unsuitable housing as is identified in Housing Issue 1, above. Lowering the percentage (Option H2B) is likely to increase total provision, but as with thresholds viability of small developments may become an issue.

Housing Issue H3 – How do we ensure that the tenure of affordable housing provided meets needs?

The provision of social rented housing can support accessibility to services, employment and the particular community in which it is located. Negotiating on a case by case basis (Option H3A) may lead to a level of provision based on economic interests. Whilst viability is a legitimate objective, pursuing this ahead of need may not deliver sufficient social rented housing. Conversely, a policy target led by need (Option H3B) would be based on a level of provision identified in the Housing Market Assessment. Such a policy could include a degree of flexibility to avoid pursuing targets that were not appropriate in a particular context or if tenure needs changed over time. Flexibility could be included to avoid problems where a particular mix at any location was not viable.
Housing Issue H4 – Should the Council try to identify and allocate rural exception sites?

Meeting the need for affordable housing in the larger settlements can support access to key services and the community. It would seem appropriate, therefore, that such an approach were supplemented by an exceptions policy to ensure provision in rural areas. In the current plan, criteria are stipulated whereby housing could be provided in rural areas (Option H4A), although exception sites have not been allocated. This has delivered a number of affordable housing schemes around the Borough in a reactive rather than pro-active way. It is possible that allocating sites (Option H4B) could assist with delivery, although allocating sites in advance may not necessarily lead to the site coming forward.

The policy could be qualified by a mechanism that only allocates sites that are committed to be developed in a certain time period. Strong and clear criteria would also be required to ensure measures are implemented to support access by public transport, walking and cycling to services, recreation and employment. The Spatial Portrait identifies accessibility to supermarkets as a particular issue. Scope may exist to improve this through farm shops in rural areas. It may also be justified to require specific benefits to biodiversity and the historic environment and requiring a higher level of the Code for Sustainable Homes.

Housing Issue H5 – Should the Council extend the rural exceptions policy to all villages?

The existing policy of allowing exceptions where there is a defined settlement boundary (Option H5A) supports the provision of affordable housing in rural areas, although not all need is being met. Allowing affordable housing as an exception in smaller settlements (Option H5B) would only increase the supply of affordable housing by a small amount, but may be significant in terms of supporting that community. Strong and clear criteria would be required, however, to ensure the best access to services, recreation and employment possible. It may also be justified to require specific benefits to biodiversity and the historic environment and requiring a higher level of the Code for Sustainable Homes.

Housing Issue H6 – How do we ensure that the type and mix of housing meets demand?

Prescribing the mix (Option H6A) allows people on all budgets an opportunity to live in the most appropriate locations to access services and facilities they need including health and formal and informal recreation. A mixed community may support cultural and economic diversity and be more vibrant throughout the day and may be more socially stimulating.

A mix based on the Housing Market Assessment would be most appropriate where the SHMA is up to date. Such a policy would need to include a degree of flexibility to ensure targets reflected the market. Furthermore, in some locations different property mixes may be more or less suited to climate change issues, particularly flooding; landscape, heritage and conservation interests. A standard mix across the Borough may not, therefore, be appropriate.

An approach based on site by site negotiations (Option H6B) is more likely to be based on viability rather than meeting social objectives of PPS3 and the market preference for a more zoned approach may hold greater influence. This could limit the level to which the community is integrated and prevent people on all budgets from having an opportunity to live in the most appropriate locations to access services and facilities they need.

Viability is a legitimate objective, however, that is more responsive to changes in demand and it may be that the best approach would be a hybrid approach that ensures that the
key principles are met and that accessibility objectives can be achieved whilst ensuring development comes forward by allowing a degree of flexibility.

**Housing Issue H7 – How do we meet the housing needs of particular groups?**

Whilst the existing approach of encouraging the provision of special needs homes in suitable locations but not setting a target (Option H7B) supports meeting housing need, not all needs are being met. A more proactive approach (Option H7A) of specifying targets and identifying sites where need can be met would not only support this specific objective, but also provide strong support to ensure people with special needs have good accessibility to services, employment and recreation. A mix of housing size and types based on the Housing Market Assessment would be most likely to meet need where the SHMA is up to date. Need may, however, vary geographically over time and the most effective policy would include a mechanism to ensure that objectives and targets were up to date.

**Housing Issue H8 – How should the Council identify and allocate new sites to meet the requirement for Gypsy, Traveller and Travelling Showpeople Pitches?**

The Living and Working Topic Paper identifies factors that could be considered when assessing where new sites for Gypsies, Travellers and Travelling Showpeople should be located. All the factors identified are considered to be appropriate. Appraisal indicates that policy should include strong and clear criteria for site selection, layout and design to ensure good access to services, recreation and employment and to ensure that there is no harm to landscape, biodiversity and the historic environment. It may be appropriate to include factors from categories in the Code for Sustainable Homes, particularly to address climate change and to seek benefits to biodiversity.

**Employment Issue E1 – How do we protect existing employment land?**

The Living and Working Topic Paper identifies criteria for determining the suitability of industrial and commercial sites under Policy IC2 and IC3 of the adopted Waverley Borough Local Plan 2002.

Criterion 1 (no adverse impact on local environment or residents) supports a healthy and high quality residential environment. A balance needs to be achieved, however, between proximity of appropriate uses and avoiding harm to amenity and this is partly addressed by Criterion 2 (close to source of labour). It is noted that tension could exist between these two criteria and this emphasises the importance of more detailed guidance with respect to the nature of different uses and nuisance.

Locating businesses near customers and ancillary uses (criterion 3) supports a reduced need to travel/transport goods and, since it entails an element of zoning uses may help avoid/limit nuisance. A further potential benefit associated with criterion 3 is that centres of excellence may emerge and these could be linked to pooled educational resources. Maximum benefits could be achieved if development were linked to improving the skills match (Smart Economic Growth).

Criterion 4 (good access to transport network) and criterion 5 (public transport, walking and cycling) supports reduced emissions and energy use. The benefits of good access to markets may stimulate inward investment.
Employment Issue E2 – What approach should the Council take in relation to additional land and buildings for industrial and commercial use?

Using previously developed land (1) and locating within the main settlements (2) supports social inclusion and reducing poverty by ensuring employment land is available where it is accessible. To strengthen the sustainability attributes policy criteria could require travel plans and that an appropriate level of BREEAM could be achieved. Development could improve a neighbourhood, but it may be necessary to include criteria to ensure that the nature of the use, layout and design would enhance the character. Criteria may also be necessary to ensure:

- remediation would be undertaken and that this would reduce pollution;
- appropriate survey and protection of species found on the site; and
- that development met the PPS25 sequential test if necessary

The strategy would need to be such to ensure that an appropriate balance can be achieved between retaining existing and providing new employment land and ensuring the South East Plan target for housing can be met.

Providing employment land where it is accessible to residential areas and other services and facilities (6) and where it is accessible by public transport (7) would strongly support sustained economic growth and would require the same criteria as identified above to be set out in policy.

Similar impacts and issues are relevant where expansion and redevelopment of existing employment sites occurs (3) and in identifying new sites (4). Where new sites are considered outside the existing urban areas, criteria may be necessary to ensure there would be no adverse impacts on important habitats, the landscape and that the nature of the use, layout and design would enhance the historic environment.

In rural settlements (5) accessibility to employment opportunities could improve and consolidate existing services, but the scale should be appropriate to avoid drawing in too much car traffic. In this instance, travel plans should be a requirement for all development and consideration could be given to the associated provision of associated affordable housing. Consideration could also be given to improving the skills match within the settlement since there would be no guarantee that the residents would be appropriately qualified for the available employment.

Employment Issue E3 – How do we deal with the reuse of buildings in the countryside?

Existing policy (Option E3a) allows development in rural areas, which responds to the market. This is often likely to be for housing or employment and may include the provision or consolidation of key services, facilities and amenities. Development may not necessarily, however, always be in the interests of the whole community and it may be appropriate to ensure that the opportunity to provide affordable housing is considered and to include criteria concerning accessibility by different modes and avoiding pollution in all its forms (water, air, noise and light). Where reuse is for employment consideration could be given to improving the skills match within the settlement and linking the provision of affordable housing.

Option E3b would allow development in rural areas, which could respond to, identified need, but prioritise employment use. This could include the provision or consolidation of key services, facilities and amenities and sustainable tourism. Consideration could be given to improving the skills match within the settlement and linking the provision of affordable housing.

If Option E3b were taken forward, policy could identify priorities but retain a degree of flexibility to recognise that circumstances vary across the Borough and change over time.
Currently, priorities identified in the Sustainability Scoping Report include access to housing and the provision of facilities for young people in rural areas.

Whichever policy is adopted, the protection of rural landscapes will be an essential criterion and the important contribution of small firms and tourism to a diverse, adaptable and strong rural economy should be recognised.

Employment Issue E4 – What should the Council’s approach be in relation to the location and scale of any new employment in rural areas?

The Living and Working Topic Paper presents a list of criteria that could be applied to test proposed employment development in rural areas. Appraisal has also been used to identify criteria that may be relevant when considering development in rural areas such that the findings can be compared with the list that is presented in the Topic Paper. It is considered that the provision of employment land in rural areas is important on the basis that it would improve accessibility to employment opportunities and that the services provided/consolidated would support well being in the settlement in question. Appraisal has identified, however, that care should be taken to avoid drawing in too much car traffic. In this respect, criteria used to judge developments could include consideration of associated affordable housing provision, improving the skills match at the location and requiring travel plans. The following criteria may also be appropriate:

- the provision of green space alongside employment development
- compatibility with or enhancing the character of the area
- avoid a significant change in the character of traffic
- address pollution in all its forms (water, air, noise and light)
- avoid adverse impacts on important habitats
- appropriate survey and protection of species found on the site
- avoid adverse impacts on landscape
- the nature of the use, layout and design to enhance the townscape/historic environment
- avoid flood risk
- achieve an appropriate level of BREEAM
- use previously developed land as a priority
- support opportunities for sustainable tourism

Town Centres and Shopping Issue TCR1 – How do we maintain and enhance the vitality and viability of Farnham, Godalming, Haslemere/Weyhill and Cranleigh?

Option TCR1a proposes to maintain the current reactive approach of seeking to enhance and maintain vitality as opportunities arise. Provision would respond to the market to provide employment opportunities and the provision or consolidation of key services, facilities and amenities. Development proposals may not necessarily always be in the interests of the whole community, however, and it may be appropriate to stipulate criteria that would ensure good accessibility by different modes; a travel plan; avoiding pollution in all its forms (water, air, noise and light); protecting and enhancing landscape, heritage and biodiversity; meeting the PPS25 sequential test if necessary; and that an appropriate level of BREEAM could be achieved. Criteria requiring design that reduces opportunities for crime would also be important.

These general criteria would also apply for Option TCR1b (identify sites on a sequential basis), although this strategy is likely to facilitate provision in the most accessible locations, which would support addressing poverty, health and social exclusion on a Borough wide level. This may not, however, address isolated pockets of deprivation where there is poor access by public transport and low car ownership. Reviewing
boundaries of existing retail centres and identifying suitable land for development (Option TCR1c) would have similar attributes, but seeks to more closely meet identified need.

This would require regularly updated survey and assessment of each centre. Protecting existing services and facilities (Option TCR1d) would support community identity and meet need in the most accessible locations. This may not address isolated pockets of deprivation, however, and a proactive policy to supplement this strategy could be considered.

Leisure, Recreation and Tourism Issue 1 – How can the Core Strategy support the maintenance and delivery of leisure and recreation facilities and opportunities for the local community?

The Living and Working Topic Paper presents no options. Appraisal has considered what criteria and issues might be relevant when considering the leisure and recreation facilities and opportunities for the local community. The importance of these activities and opportunities is strongly emphasised with respect to supporting social inclusion, health and reducing poverty and reduce the need to travel to other centres.

Retaining and enhancing leisure services, recreation facilities and green space not only supports social inclusion, health objectives and reducing the need to travel, but it is compatible with the aims of sustained economic growth and may stimulate investment. Further sustainability benefits could be realised if the strategy and policy were to identify areas with deficiencies and identify the means to address them. As well as providing recreation opportunities, green spaces could integrate biodiversity benefits, enhance heritage assets, measures to address flooding, resource efficiency measures such as community composting (on a small scale) and allotments, and could be a key element of sustainable tourism.

Policy should seek to maximise the contribution made to the vitality of a centre/village and to support community identity. Projects can support heritage interests and help retain the existing character. The impact on the causes and consequences of climate change would need to be neutral or beneficial. To this end support could be offered for retrofitting energy efficiency and renewable energy and/or requiring these measures to be incorporated into new development and operations. Opportunities to improve the self sufficiency of communities include community energy projects.

Leisure, Recreation and Tourism Issue 2 – How can the Core Strategy support Waverley’s role as a destination for visitors?

The Living and Working Topic Paper presents no options. Appraisal has considered what criteria and issues might be relevant when considering the role of Waverley as a visitor destination.

Tourism services and facilities provide employment and could include leisure, recreation and green space. It can support the retention of key services and provide a catalyst for community identity and participation. High quality landscape and townscapes, heritage and biodiversity are valuable resources to tourism and policy criteria would be necessary to avoid harm and secure benefits. The provision and enhancement of services and facilities should not create any nuisance or capacity problems such as parking provision.

Travel by any means other than cycling or walking is a major contributing factor to greenhouse emissions as is consumption of goods and services by tourists. Sustainable tourism could be encouraged which seeks to minimise emissions by linking with public transport and local produce. Support could also be given to retrofitting tourist
accommodation with respect to energy efficiency, water efficiency and waste separation capability as well as the installation of renewable energy. Tourism can play a major role in education in this respect and in establishing skills in the Area of outstanding Natural Beauty that would support the AONB Management Plan.

5. Environment, Biodiversity and Climate Change Topic Paper

Environment (AGLV) Issue 1 – How to protect the landscape from adverse change?

Retaining the AGLV designation until the AONB boundary review is completed (Option A) would provide continuity and certainty with respect to how planning policy protects the landscape and the historic environment where it is an integral part of the landscape. Certainty and familiarity may support business investment and strengthen community identity in the short term. Equally, the inflexibility of a ‘blanket’ approach may unnecessarily frustrate innovation in the areas of addressing rural economic needs and addressing climate change.

The process of character assessment (Option B) may lead to uncertainty in the short term with respect to how planning policy protects the landscape and the historic environment. Interim policy guidance may be necessary to ensure development proposals are the subject of rigorous landscape assessment. In the long term, policy decisions may be better informed in terms of the actual landscape value of land and allow flexibility to develop areas which do not contribute to landscape value. The process of character assessment could engage local communities in asserting/reconnecting with their identity.

The application of renewable energy technologies, particularly wind power, in important landscape areas would benefit from a comprehensive assessment. This would be compatible with either option, although a landscape character assessment approach may offer greater flexibility to address the causes and consequences of climate change.

Similarly, character assessment may offer greater flexibility to address the needs of business, although strict controls and rigorous assessment would be required to avoid incremental degradation.

Environment (Strategic Gap) Issue 2 – How to protect the landscape from adverse change?

Retaining the designations (Option A) would provide continuity and certainty with respect to how planning policy protects the landscape and the historic environment where it is an integral part of the landscape. Certainty and familiarity may provide stronger protection from development and strengthen community identity, particularly Farnham and Aldershot. This may also support business investment. Areas of Strategic Visual Importance may protect accessible green space.

The retention of the designations may limit opportunities for renewable energy technologies, particularly wind power.

The process of character assessment (Option B) may lead to uncertainty with respect to how planning policy protects the landscape in the short term. Interim policy guidance may be necessary to ensure development proposals are the subject of rigorous landscape assessment. In the long term, policy decisions may be better informed in terms of the actual landscape value of land and allow flexibility to develop areas which do not
contribute to landscape value. The application of renewable energy technologies, particularly wind power, in important landscape areas would benefit from a comprehensive assessment.

The process of character assessment could engage local communities in asserting/reconnecting with their identity. Conversely, where the designation is made purely to avoid coalescence and landscape value is poor, land may be exposed to greater risk from development. Policy criteria could include rigorous assessment requirements supported by design guidance. Similarly, character assessment may offer greater flexibility to address the needs of business, although strict controls and rigorous assessment would be required to avoid incremental degradation.

Environment (Housing Density) Issue 3 – How to protect the character of towns and villages?

High density mixed use development could be allowed with either option, a key element to meeting housing need and sustained economic growth. The absence of clear and robust control on densities, however, in Option A (rely on PPS3) implies a slightly higher risk of inappropriate development with respect to landscape, townscape and heritage. Setting density ranges across the Borough (Option B) would provide greater certainty that adverse impacts in this respect could be avoided. The weakness of Option B may lie in its inflexibility to accommodate specific, localised circumstances. Both options would rely heavily on the provisions of the Code for Sustainable Homes with respect to delivering development that is adaptable to climate change, limits environmental impacts and maximises benefits in terms of green space and biodiversity.

Environment (Local Character) Issue 4 – How to protect the character of towns and villages?

The majority of development in the Borough is within towns and villages. Current policy (Option A) seeks to avoid harm to local character based on the protection of well established character areas. Continuing this policy would protect those areas from inappropriate development in the context of the need to identify sites for 5000 houses. Whilst this would ensure densities, layout and design appropriate for the identified character areas, it would not protect other areas with character that have not been designated. Equally, the inflexibility of the policy may prevent the use of higher densities where there is good accessibility to services and facilities.

Identifying new character areas (Option B) would protect local character more strongly, but the restrictive element on development would be more significant. This may lead to additional pressure for development in areas not designated and/or a greater need to identify greenfield sites for housing. For either Option A or B, the provisions of the Code for Sustainable Homes can require high standards of design that support environmental objectives.

The nature of the impacts in Option C (a character assessment approach) would depend on the methodology used for and manner in which character assessment is applied. A flexible approach that encourages innovation could ensure densities are appropriate for the location but allow higher densities at the most accessible locations. Design, layout and density could draw on the provisions of PPS3, information on the existing character areas and village design statements and include consideration of heritage, biodiversity and climate change. Policy could also require implementation of the Code for Sustainable Homes and BREEAM at a high level. A less flexible approach to character assessment could lead to significant restriction on development in urban areas, limiting the ability to
consolidate sustainable transport patterns and could increase the need for greenfield sites. Either policy could be supplemented by Area Action Plans could be prepared for areas where significant change is likely.

**Environment Issue 5 – How to protect heritage?**

The Environment, Biodiversity and Climate Change Topic Paper identifies the need to reflect draft South East Plan Policy BE6, which requires the Local Development Framework for Waverley to support the protection and enhancement of the historic environment. The Spatial Portrait for Waverley notes that the Borough has a rich heritage with 45 Conservation Areas and over 1600 listed buildings. The requirement to accommodate 5000 new residential properties by 2026 combined with a target of 60% of housing to be built on previously developed land (pdl) means that there is likely to be pressure for change in urban areas and this could result in adverse impacts on the historic environment. Where development is on greenfield sites, the need to protect or otherwise address the existence of archaeological remains may emerge.

Heritage is a substantial element in the combination of factors that comprise the local character that makes Waverley a desirable place to live and work. It is important to the economy in this respect and in the role it plays in supporting tourism. In engaging with heritage in this way, a balance would need to be found between improving and promoting accessibility to the historic environment and avoiding harm to vulnerable assets. It may be the case, however, that the funds attracted through commercial exploitation can be used to address the causes of a heritage asset being at risk from damage or loss. Appraisal has also identified potential conflict with heritage interests through the need to address the causes and consequences of climate change. Currently, it is common for the design solutions to be at odds with heritage interests. An example is photovoltaic cells on roofs to generate electricity. It is noted that the availability of alternative products is continually improving and in this instance ‘slate look’ photovoltaic tiles are now available.

The combination of research, guidance and information by local government to support architects and builders would most effectively be achieved through joint working across authority boundaries.

In addition, the need to avoid areas of flood risk combined with a national policy target of building 60% of homes on pdl together with a need to maximise the number of homes built in locations with good access to public transport and services, means that other sustainability objectives will require high density development. Where these locations coincide with important areas of character, it will be the role of character assessment to determine whether and how this is appropriate given the need to protect and enhance heritage.

**Biodiversity Issue 1 – How to protect biodiversity?**

The Topic Paper does not present any options. Appraisal has considered what criteria and issues might be relevant with respect to biodiversity.

A clear strategy supported by policies and criteria are necessary to avoid adverse impacts on important habitats and to ensure appropriate survey and protection of species. Links between access to green space and contact with the natural environment can be strengthened to the benefit of health and community identity, although a balance needs to be found between access to natural green space and harm to habitats. Protecting and enhancing habitats and biodiversity is also a key element of sustained economic growth. Employment in conservation services linked to AONB objectives could be substantial, particularly if linked to education and tourism. Greenspace can play a role in reducing pollution through the application of SUDS.
The protection and enhancement of greenspace can play a role in reducing the risk of flooding through the application of SUDS, setting a context for heritage buildings and protecting important landscapes and townscape. The role of the Code for Sustainable Homes could be central to resource efficiency alongside achieving biodiversity benefits by employing methods such as green roofs.

**Climate Change Issue 1 – How should the Core Strategy deal with sustainable design and construction?**

**Energy Efficiency**

The improvement to energy efficiency affected by implementation of Part L Building Regulations (Option A) would help to address fuel poverty in new homes and reduce energy based emissions in the global context. It is not likely, however, that this would achieve the Climate Change Act 2008 target of 80% reduction in CO₂ emissions by 2050.

Not addressing climate change fully is also likely to adversely affect GDP growth. In the long term, problems may arise as buildings become less suitable.

Whilst this option may entail lower building costs in Waverley Borough compared to other areas in the short term, not fully addressing climate change may be interpreted negatively by potential investors.

Bringing forward the Building a Greener Future programme (Option B) would encourage design that would improve energy efficiency in new buildings. This option would help reduce emissions of CO₂ in the global sense and help address fuel poverty by reducing the lifetime energy costs of the building. It is not likely, however, to be sufficient to properly address the causes and consequences of climate change.

Setting a specific level of the Code for Sustainable Homes or BREEAM (Option C) would ensure design that would not only address energy efficiency fully, but also improve health and well being; water management; and provision for cycling, waste and biodiversity. BREEAM and the Building Regulations are currently the relevant standards for commercial buildings. Policy could be worded flexibly such that the commercial equivalent of the Code for Sustainable Homes can be adopted once published.

Whilst sustainable design can reduce the running costs of a building and reduce overall costs, there may be an adverse impact on viability and this may squeeze the availability of funds for contributions.

The identification and implementation of design solutions may involve community participation and reinforce community identity. In addition, sustainable design can often draw on traditional techniques. The development of local expertise in sustainable design will help maintain current levels of employment for local craft and tradesmen. In the long term, not addressing climate change is likely to result in significant dissatisfaction.

The design requirements of the Code for Sustainable Homes emphasises the importance of using locally sourced materials and can act as a catalyst for locally distinctive architecture and enhance the image of the Borough. Policy criteria may be necessary, however, to clarify the need to enhance heritage. A further issue is that this may lead to additional pressure to open/expand quarrying for some materials.

Community energy schemes could act as a catalyst to strengthening community identity and participation provide a cost effective energy solution for commercial development.
The potential to address fuel poverty and security is substantial. Irrespective of the option taken forward in the Core Strategy policy would only apply to newly built properties. Given the South East Plan target of 5000 homes to be built by 2026, the stock of properties not meeting these higher standards would represent nearly 90% of the total. This would be equally true of commercial buildings. Consideration should be given to how retrofitting of older properties can be encouraged and supported.

Water Minimisation

In the long term, the availability of water may become a significant deprivation issue. The ability of a property to continue to support (residential and non residential) those using it will be increasingly important. The availability of water may become an important factor influencing investment choices.

Option A would improve water and energy efficiency. The water companies report that Waverley is, however, in an area of severe water stress and it is likely that not addressing this fully would adversely affect health and GDP. Option B provides for a more substantial improvement, but a more comprehensive approach may be necessary. Option C would address concern about the availability of water in the long term and make a significant contribution to reducing the amount of energy required to deliver water to properties.

Climate Change Issue 2 – How should the Core Strategy deal address the need for renewable energy and low carbon technologies?

The lower level of provision proposed in Option A would contribute to stability in energy supply and cost and reduce short term building costs. The long term interests of business may not, however, be fully served through this level of provision. Furthermore, it is unlikely that this level of development would make a significant contribution to meeting the target of the Climate Change Act 2008 of reducing CO₂ emissions to 80% of 1990 emissions by 2050. Option B would make a more substantial contribution, but is not likely to ensure sufficient capacity. A more sustainable version of Option B would be to steadily increase the required percentage, as in Option C. Option C would support the long term interests of business, but a flexible approach may be necessary to enable viability issues to be addressed where they arise.

For all three options maximum benefits would be possible if it were expressed that projects would take priority where they:

- address fuel poverty
- link to AONB objectives through biomass energy (sustainable woodland management, education, local skills and tourism)
- strengthen community identity and participation
- compatible with climate change predictions

Option C would provide the greatest scope to integrate these interests and maximise benefits.

A comprehensive assessment of the application of renewable energy technologies in the Borough could be undertaken to inform a strategy. This would include landscape character assessment since avoiding harm to the landscape and heritage would be important.
Climate Change Issue 3 – Energy Savings calculations

This has not been appraised since it is essentially about the technical approach to calculations rather than a strategic or policy issue.

Climate Change Issue 4 – How should the Core Strategy ensure that developments adapt to the consequences of climate change?

The combination of PPS25 and the Code for Sustainable Homes provides a strong basis for addressing the issues, such that development would be directed away from areas liable to flood and design would be used to address reducing the rate of run off from properties, improving water efficiency and improving passive heating and cooling. Policy should be worded flexibly such that the commercial equivalent of the Code for Sustainable Homes can be adopted once published. Guidance with respect to adapting heritage buildings would be useful. This could be prepared at a Sub Regional, Regional or National level.

Policy can emphasise the importance of ensuring key services are accessible to communities during severe weather events. Again, directing development away from areas liable to flood as identified in the Strategic Flood Risk Assessment would be a fundamental principle.

Policy can emphasise the importance of passive heating and cooling in buildings and public areas, provide a focus on addressing fuel poverty, and require development proposals to improve links between habitats to facilitate migration and adaptation. Where landscape and habitat management are part of a proposal, this could be linked to education and skills appropriate to addressing climate change. Climate change projects could be linked to AONB objectives, education and tourism. Community based solutions can act as a catalyst to strengthening community identity and participation.
Strategic options for location of development

| Sustainability Appraisal Objective 1: Reduce Poverty and Social Exclusion |
|---|---|---|---|---|---|---|---|
| Option 1 Score | Option 2 Score | Option 3 Score | Option 4 Score | Option 5 Score |
| The overall impact is likely to be positive since Option A is likely to maximise accessibility to services and facilities for the most densely populated areas of the Borough. There is a risk, however, that social exclusion in more remote areas may not be addressed. | The overall impact of Option 2 is likely to be positive. The four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would still be the focus for development. However, if sites around the smaller settlements listed in this Option were to be released then it may lessen the amount of development in and around the main settlements, lessening some of the benefits of locating new housing close to the largest concentrations of population. Conversely, by allowing development in and possibly around these second tier settlements, may assist in addressing social exclusion issues in these areas. | The overall impact of Option 3 is likely to be positive. The four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would still be the focus for development. However, if sites around the villages generally were to be released then it may lessen the amount of development in and around the main settlements, lessening some of the benefits of locating new housing close to the largest concentrations of population. Conversely, allowing development in and possibly around the villages generally, may assist in addressing social exclusion issues in these areas. | If any potential shortfall were met through a single urban extension, it could help to address these matters in the chosen settlement, but would be less responsive to these needs in the other main settlements and the villages. The benefits identified in Option 1 would still apply, but to a lesser extent. | 0 | If any potential shortfall were met through a new freestanding settlement, it would be less responsive to these needs existing settlements across the Borough. The benefits identified in Option 1 would still apply, but to a lesser extent. | 0/- |

IMD suggests that the areas where deprivation needs to be addressed are locations in Godalming, Ockford and Farnham.

Tom Sylger Jones, MRTPI. Independent consultant.
### Sustainability Appraisal Objective 2: Improve the health of the population

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<tr>
<th>Option 1</th>
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<tr>
<td>The overall impact is likely to be positive since likely to maximise accessibility to services and facilities for the most densely populated areas of the Borough. There is a risk, however, that health issues in more remote areas may not be addressed.</td>
<td>+</td>
<td>The overall impact is likely to be positive. The four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would still be the focus for development. However, if sites around the smaller settlements listed in this Option were to be released then it may lessen the amount of development in and around the main settlements, lessening some of the benefits of locating new housing close to the largest concentrations of population. Conversely, by allowing development in and possibly around these second tier settlements, may assist in supporting health and recreation facilities in these areas. There is a risk, however, that health and recreation needs in the smaller villages and more remote areas may not be addressed.</td>
<td>+</td>
<td>The overall impact is likely to be positive. The four main settlements (Farnham, Godalming, Haslemere and Cranleigh) would still be the focus for development. However, if sites around the villages were to be released then it may lessen the amount of development in and around the main settlements, lessening some of the benefits of locating new housing close to the largest concentrations of population. Conversely, allowing development in and possibly around the villages generally may assist in supporting health and recreation facilities in these areas.</td>
<td>+</td>
<td>If any surplus were met through a single urban extension, it would be essential that such development is supported by sufficient new or improved health and recreation facilities to meet the needs of the new population. Without this there would be a negative impact. May lessen the amount of development in and around the main settlements, lessening some of the benefits of locating new housing close to the largest concentrations of population. Likely to be limited opportunity to improve access to health services in rural areas.</td>
<td>-</td>
<td>If any surplus were to be met through a new freestanding settlement, it would be essential that it has good access to necessary health and recreation facilities to meet the needs of the new population. Without this there would be a negative impact. May lessen the amount of development in and around the main settlements, lessening some of the benefits of locating new housing close to the largest concentrations of population. Likely to be limited opportunity to improve access to health services in rural areas.</td>
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### Sustainability Appraisal Objective 3: Improve the education and skills of the population

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<tr>
<td>Unlikely that any of these broad options performs better in relation to improving the education and skills of the population. Ultimately it will depend on the extent to which local education infrastructure can respond to local increases in population.</td>
<td>0</td>
<td>Unlikely that any of these broad options performs better in relation to improving the education and skills of the population. Ultimately it will depend on the extent to which local education infrastructure can respond to local increases in population.</td>
<td>0</td>
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<td>Unlikely that any of these broad options performs better in relation to improving the education and skills of the population. Ultimately it will depend on the extent to which local education infrastructure can respond to local increases in population.</td>
<td>0</td>
<td>Unlikely that any of these broad options performs better in relation to improving the education and skills of the population. Ultimately it will depend on the extent to which local education infrastructure can respond to local increases in population.</td>
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This would be particularly important if a large proportion of the new housing were to go into a single location as proposed by this Option. There is potential for a negative impact unless education infrastructure is able to respond to this increased demand in the area where the urban extension is located. The option would be more sustainable if major investment in public transport could support not only a new settlement, but also

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Tom Sylger Jones, MRTPI. Independent consultant.
**Sustainability Appraisal Objective 4: Ensure everyone has the opportunity to live in a decent and affordable home**

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<th>Option 1</th>
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<tr>
<td>Overall impact positive. Focus on the main settlements provides the opportunity to match supply to local need. The need in the villages for subsidised affordable housing would still be capable of being met through retention of a policy for rural exception sites. However, this option would limit the scope to meet the demand for market housing outside the main settlements.</td>
<td>+</td>
<td>Overall impact positive. Focus on the main settlements provides the opportunity to match supply to local need. The need in the villages for subsidised affordable housing would still be capable of being met through retention of a policy for rural exception sites. This option provides a greater opportunity than Option 1 to address the demand for market housing in the second tier settlements covered by Option 2. However, this option would limit the scope to meet the demand for market housing in the smaller villages and more remote parts of the Borough.</td>
<td>+</td>
<td>Overall impact positive. Focus on the main settlements provides the opportunity to match supply to local need. This option provides an ‘all-or-nothing’ option or there could be a need to provide more housing than needed – both in the interests of achieving all sustainability objectives. This would lead to the strategy being less responsive than Options 1 – 3 to housing need/demand across the Borough.</td>
<td>+</td>
<td>How this Option performs would depend on how large the urban extension is and where it is located. There would still be a proportion of the development taking place within the main settlements and there would still be an allowance for rural exception schemes to meet the affordable housing needs within villages. An urban extension could need to be an ‘all-or-nothing’ option or there could be a need to provide more housing than needed – both in the interests of achieving all sustainability objectives. This would lead to the strategy being less responsive than Options 1 – 3 to housing need/demand across the Borough.</td>
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Tom Sylger Jones, MRTPI. Independent consultant.
**Sustainability Appraisal Objective 5: Reduce crime, the fear of crime and antisocial activity**

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<th>Option 4</th>
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<tr>
<td>No option is likely to perform better than any other with respect to addressing crime and the fear of crime since it is largely a matter of the detailed form and design of development.</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to addressing crime and the fear of crime since it is largely a matter of the detailed form and design of development.</td>
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<td>No option is likely to perform better than any other with respect to addressing crime and the fear of crime since it is largely a matter of the detailed form and design of development.</td>
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<td>No option is likely to perform better than any other with respect to addressing crime and the fear of crime since it is largely a matter of the detailed form and design of development.</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to addressing crime and the fear of crime since it is largely a matter of the detailed form and design of development.</td>
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**Sustainability Appraisal Objective 6: Encourage community identity and participation**

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<tr>
<td>Each option has the potential to have a positive impact but this depends on the details of which sites or locations are identified for development and how that is integrated into the area, including the related infrastructure requirements</td>
<td>?</td>
<td>Each option has the potential to have a positive impact but this depends on the details of which sites or locations are identified for development and how that is integrated into the area, including the related infrastructure requirements</td>
<td>?</td>
<td>Each option has the potential to have a positive impact but this depends on the details of which sites or locations are identified for development and how that is integrated into the area, including the related infrastructure requirements</td>
<td>?</td>
<td>Each option has the potential to have a positive impact but this depends on the details of which sites or locations are identified for development and how that is integrated into the area, including the related infrastructure requirements. An Option, like Option 4, which places a large amount of new housing in one place would require very careful planning to ensure that required infrastructure and services are provided for the new residents. There is the potential that a</td>
<td>?</td>
<td>Each option has the potential to have a positive impact but this depends on the details of which sites or locations are identified for development and how that is integrated into the area, including the related infrastructure requirements. An Option, like Option 5, which places a large amount of new housing in one place would require very careful planning to ensure that required infrastructure and services are provided for the new residents. There is the potential that a</td>
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planned urban extension would create a new neighbourhood and give the opportunity for a new identity. This could be positive. However, existing residents in the area may well perceive that a large development in one place would place a strain on infrastructure and services, such as the local road infrastructure.

Impact on the local road network was one of the reasons why the proposed new settlement at Dunsfold Park was not allowed on appeal.

### Sustainability Appraisal Objective 7: Ensure high and stable levels of employment

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<th>Option 1</th>
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<tbody>
<tr>
<td>Overall impact positive. Opportunity to locate new housing close to the main centres of employment. Less scope to locate market housing in areas that support the rural economy. Good access to rail to commute to London.</td>
<td>++</td>
<td>Overall impact positive. If development is allowed within and around the second tier settlements covered by this option then it would not perform as well as option 1 in terms of concentrating new housing closest to the main areas of employment. However, there is the opportunity to provide market housing in these villages which may support the provision and retention of local employment opportunities. Less</td>
<td>+</td>
<td>Overall impact positive. If development is allowed within and around the villages generally then it would not perform as well as options 1 and 2 in terms of concentrating new housing closest to the main areas of employment. However, there is the opportunity to provide market housing in the villages, which may support the provision and retention of local employment opportunities.</td>
<td>+</td>
<td>If a proportion of the new housing were to continue to be within the main settlements then it should also be closest to the main areas of employment. The urban extension could, however, contain a significant proportion of the housing required. The extent to which this would be supported by employment opportunities would depend on the location.</td>
<td>+</td>
<td>If a proportion of the new housing were to continue to be within the main areas of employment. A new freestanding settlement could, however, contain a significant proportion of the housing required. The extent to which this would be supported by employment opportunities would depend on the location. The proposal for a new</td>
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Sustainability Appraisal Objective 8: Improve accessibility to services, facilities and amenities

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<tr>
<td>Option 1 is likely to have the most positive impact as it would maximise accessibility to services and facilities for new residents. Limiting development in and around villages holds the risk that it may make it less easy to sustain local services.</td>
<td>++</td>
<td>Unlikely to be as positive as Option 1 with respect to access to the most comprehensive services since it would allow more development beyond the four main settlements. However, allowing some development in and around these second tier settlements could help to encourage and sustain local services. As with Option 1 there is a risk that this option would limit opportunities to sustain local services in the smaller villages.</td>
<td>+</td>
<td>Unlikely to be as positive as Option 1 or Option 2 with respect to access to the most comprehensive services since it would allow more development beyond the four main settlements and the greatest proportion of development in the less accessible settlements with fewer services and facilities. Conversely, by allowing some market housing in and around the villages, it could help to encourage and sustain local services. However, this may be very difficult to evidence in terms of quantifying the level of development</td>
<td>+</td>
<td>An urban extension may be of sufficient size to support some limited services and infrastructure, but there would be an issue about access to a wider range of services. This would depend, in part, on where an urban extension is located and how accessible it is to this wider range of services. As housing development would be limited to within the main settlements and the single urban extension, it would not allow for much development in the villages. The impact</td>
<td>?</td>
<td>Depending on its size, a new freestanding settlement may be able to support some services and infrastructure, as was the case with the proposed freestanding settlement at Dunsfold Park. However, there would be an issue about access to a wider range of services. With a new settlement of the size proposed at Dunsfold Park, there would still be the need for residents to travel to access jobs, education, health facilities, recreation facilities. Notwithstanding what provision is made to improve rural public</td>
<td>-</td>
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Sustainability Appraisal Report
Appendix 2

needed to support local services.

would be adverse where villages needed development to support the retention of local services.

transport, the likelihood would be that many of these trips would have to be made by car.

Furthermore, as housing development would mainly be limited to within the main settlements and the new freestanding settlement, it would not allow for much development in the villages. This would have a further negative impact where villages needed development to support the retention of local services.

**Sustainability Appraisal Objective 9: Improve the satisfaction of people with their neighbourhood as a place to live**

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<tr>
<td>No option is likely to perform better than any other with respect to addressing the quality of a neighbourhood since it is largely a matter of the detailed nature, form and design of development. It will also depend on the overall amount and concentration of development and linked issues such as the availability of infrastructure and services to support any increase in population arising from new housing development.</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to addressing the quality of a neighbourhood since it is largely a matter of the detailed nature, form and design of development. It will also depend on the overall amount and concentration of development and linked issues such as the availability of infrastructure and services to support any increase in population arising from new housing</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to addressing the quality of a neighbourhood since it is largely a matter of the detailed nature, form and design of development. It will also depend on the overall amount and concentration of development and linked issues such as the availability of infrastructure and services to support any increase in population arising from new housing</td>
<td>0</td>
<td>Each option has the potential to have a positive impact but this depends on the details of which sites or locations are identified for development and how that is integrated into the area, including the related infrastructure requirements. An Option, like Option 4, which places a large amount of new housing in one place would require very careful planning to ensure that required infrastructure and</td>
<td>?</td>
<td>Each option has the potential to have a positive impact but this depends on the details of which sites or locations are identified for development and how that is integrated into the area, including the related infrastructure requirements. An Option, like Option 5, which places a large amount of new housing in one place would require very careful planning to ensure that required infrastructure and</td>
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</table>
Tom Sylger Jones, MRTPI. Independent consultant.

Impact on the local road network was one of the reasons why the proposed new settlement at Dunsfold Park was not allowed on appeal.

<table>
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<tr>
<th>Sustainability Appraisal Objective 10: Prevent and control pollution</th>
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<td>Option 1</td>
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<tr>
<td>An inherently positive element in that it is likely to maximise access to services, facilities and public transport, with the related benefit of lessening the need to travel by car and lessen the attendant pollution from vehicles. A balance is needed, however, as one of the related benefits of lessening congestion does not increase to such an extent</td>
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that it exacerbates the existing problems in the Air Quality Management Areas and that other areas do not experience a decline in air quality. This issue will rely on sustainable transport, but will partly be resolved by engine technology.

residents to have to travel by car to access some key services, with the attendant pollution from vehicles. result in the need for new residents to have to travel by car to access some key services, with the attendant pollution from vehicles. the impact would be negative. improved public transport, there would still be the likelihood that residents would travel by car to access a wider range of services. If this were the case then the impact would be negative.

Sustainability Appraisal Objective 11: Maintain and enhance biodiversity and soil

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<tr>
<td>Whilst development in the four main settlements would be least likely to significantly affect biodiversity in general terms, much of the Farnham area lies within the zone of influence of the Thames Basin Heaths SPA. Sub regional guidance on avoiding or mitigating the potential impact on the Thames Basin Heaths SPA would need to be met.</td>
<td>?</td>
<td>Whilst development in the four main settlements would be least likely to significantly affect biodiversity in general terms, much of the Farnham area lies within the zone of influence of the Thames Basin Heaths SPA. Option 2 may provide opportunities to avoid the areas of Farnham closest to the SPA. Sub regional guidance on avoiding or mitigating the potential impact on the Thames Basin Heaths SPA would need to be met.</td>
<td>?</td>
<td>Whilst development in the four main settlements would be least likely to significantly affect biodiversity in general terms, much of the Farnham area lies within the zone of influence of the Thames Basin Heaths SPA. Option 3 may provide greater opportunities to avoid the areas of Farnham closest to the SPA. Conversely, the locations in smaller settlements may have locally important biodiversity. Sub regional guidance on avoiding or mitigating the potential impact on the Thames Basin Heaths SPA would need to be met.</td>
<td>?</td>
<td>Providing a large proportion of the required housing in a single urban extension may provide scope to develop in a location that avoids impact on protected habitats, notably the SPA. However, the scale of development in one location may impact on local biodiversity.</td>
<td>?</td>
<td>Providing a large proportion of the required housing in a new settlement may provide scope to develop in a location that avoids impact on protected habitats, notably the SPA. Depending on the location, the scale of development required for a new settlement could impact on local biodiversity.</td>
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## Sustainability Appraisal Objective 12: Maintain and enhance the quality of landscapes and townscape

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<tr>
<td>Less likely to require the use of sensitive greenfield land such as the AONB. Benefits can be delivered through well designed regeneration.</td>
<td>?</td>
<td>Option 2 could allow for greenfield releases around locations including Beacon Hill, Hindhead, Bramley, Chiddingfold, Elstead, Milford and Witley. Most of these are quite tightly constrained by landscape designations such as AONB and AGLV, so there is a greater risk of development coming into conflict with these designations.</td>
<td>?</td>
<td>Option 3 could allow for greenfield releases around villages generally. How it performs against this SA Objective would ultimately depend on which settlements were identified, where the site were to be located and how much development is allowed. However, it could perform less well than other options as it may be more difficult in the smaller settlements to find suitable sites than minimise the impact on the landscape.</td>
<td>?</td>
<td>With a single urban extension it may be possible to identify a location that is not affected by the main landscape designations (AONB and AGLV). However, even if the chosen location is not subject to these specific constraints, the size of an urban extension could have a damaging impact on the local landscape. In terms of locations within settlements, impact is partly dependent on the broad location within the settlement and also the detailed location, amount, form and design.</td>
<td>?</td>
<td>With a new freestanding settlement it may be possible to identify a location that is not affected by the main landscape designations (AONB and AGLV). However, even if the chosen location is not subject to these specific constraints, the size of a freestanding settlement could have a damaging impact on the local landscape. In the specific case of Dunsfold Park, the nature of the site and its current and former uses meant that the Secretary of State concluded that that particular proposal would not have an adverse visual impact on the landscape. In terms of locations within settlements, impact is partly dependent on the broad location within the settlement and also the detailed location, amount, form and design.</td>
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### Sustainability Appraisal Objective 13: Conserve and enhance the historic environment

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<tr>
<td>1</td>
<td></td>
<td>Impact will be dependent on the specific location of development relative to heritage assets and the detailed design and form of development.</td>
<td>2</td>
<td></td>
<td>Impact will be dependent on the specific location of development relative to heritage assets and the detailed design and form of development.</td>
<td>3</td>
<td></td>
<td>Impact will be dependent on the specific location of development relative to heritage assets and the detailed design and form of development.</td>
<td>4</td>
<td></td>
<td>As a proportion of the new housing would be within the main settlements there is the potential for impact on the historic landscape. However, this would depend on which locations are chosen. As the urban extension would contain a significant proportion of the required housing, it may offer more scope to control the amount of development within settlements, compared to Options 1 – 3. The direct impact would depend on the location for the urban extension.</td>
</tr>
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</table>

### Sustainability Appraisal Objective 14: Reduce vulnerability to climate change, especially flooding

<table>
<thead>
<tr>
<th>Option</th>
<th>Score</th>
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<th>Option</th>
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<th>Impact</th>
<th>Option</th>
<th>Score</th>
<th>Impact</th>
<th>Option</th>
<th>Score</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Some of the areas with highest risk of flooding are in the main urban areas. The initial findings of the SHLAA suggests, however, that sufficient sites exist to avoid increased flood risk.</td>
<td>2</td>
<td></td>
<td>Some of the areas with highest risk of flooding are in the main urban areas. The initial findings of the SHLAA suggests, however, that sufficient sites exist to avoid increased flood risk.</td>
<td>3</td>
<td></td>
<td>Some of the areas with highest risk of flooding are in the main urban areas. The initial findings of the SHLAA suggests, however, that sufficient sites exist to avoid increased flood risk.</td>
<td>4</td>
<td></td>
<td>Option 4 may offer an opportunity to avoid higher flood risk, but vulnerability to flooding may be higher away from existing service centres.</td>
</tr>
</tbody>
</table>
Option 1 provides a strong focus on the most accessible areas. This may be the most appropriate development strategy to ensure services, infrastructure and facilities are effective during severe weather events.

Option 2 may offer more opportunities to avoid higher flood risk, but vulnerability to flooding may be higher away from the key service centres.

Option 3 may offer more opportunities to avoid higher flood risk, but vulnerability to flooding may be higher away from the key service centres.

### Sustainability Appraisal Objective 15: Use energy, water and other natural resources efficiently and minimise carbon emissions so as to address the causes of climate change

<table>
<thead>
<tr>
<th>Option 1</th>
<th>Score</th>
<th>Option 2</th>
<th>Score</th>
<th>Option 3</th>
<th>Score</th>
<th>Option 4</th>
<th>Score</th>
<th>Option 5</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Option 1 would maximise access to services, facilities and public transport, thus lessening the need to travel by car and minimising carbon emissions. Option 1 offers potential for community energy and improved energy efficiency in existing and new buildings due to the mix and concentration of uses. Retrofitting old properties would be a substantial benefit if it could be achieved. The potential for utilising low carbon or renewable energy sources is good.</td>
<td>+</td>
<td>Option 2 would ensure good access to services, facilities and public transport, thus lessening the need to travel by car and minimising carbon emissions. Option 2 offers potential for community energy and improved energy efficiency in existing and new buildings due to the mix and concentration of uses. Retrofitting old properties would be a substantial benefit if it could be achieved. The potential for utilising low carbon or renewable energy sources is good.</td>
<td>+</td>
<td>Option 3 would retain the benefits of Option 1 and Option 2 with respect to access to services, facilities and public transport, thus lessening the need to travel by car and minimising carbon emissions. The benefits may be slightly diminished in principle, although the potential exists for substantial benefits by improving sustainable transport to and from less accessible villages. Option 3 offers potential</td>
<td>+</td>
<td>It is assumed that an urban extension would be required to be well located to access services and would be delivered with the highest standards of energy efficiency and the highest level of renewable energy provision. Since there is no specific location, it is not possible to form a definitive judgement at this stage.</td>
<td>?</td>
<td>It is assumed that a new freestanding settlement could not be located where good access to services and facilities already exists. Whilst a new freestanding settlement may be of sufficient size to support some local facilities, there would still be the need to travel to access employment and the wider range of services. In the Dunsfold Park case, the Secretary of State concluded that even with the new facilities and the public transport improvements, there would still be a significant number of car trips generated with the</td>
<td>?</td>
</tr>
</tbody>
</table>
for community energy and improved energy efficiency in existing and new buildings due to the mix and concentration of uses. Retrofitting old properties would be a substantial benefit if it could be achieved. The potential for utilising low carbon or renewable energy sources is good.

attendant CO₂ emissions.

A new settlement would be required to be delivered with the highest standards of energy efficiency and the highest level of renewable energy provision. This was one of the perceived benefits of the eco-village proposed at Dunsfold Park.

This is not, however, considered to be an element that should identify a new settlement as a better option in this category, however. Firstly, there is a target of moving to all new homes being zero carbon, irrespective of location, by 2016 and secondly, the benefits of sustainable energy infrastructure in existing urban areas can be equally good for new development and also offer an opportunity to retrofit older properties.
### Sustainability Appraisal Objective 16: Encourage sustained economic growth

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<th>Option 1</th>
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<tbody>
<tr>
<td>Option 1 offers potential efficiencies in respect of the co-ordination of services/ancillary services, facilities, infrastructure and accessibility for employees. Conversely, sustainable economic growth may require a more buoyant rural economy and there is a risk that an over-concentration of opportunities in the higher order settlements may hinder this.</td>
<td>+</td>
<td>Option 2 would perform well, but not as well as Option 1 in terms of the potential efficiencies in respect of the co-ordination of services/ancillary services, facilities, infrastructure and accessibility for employees. Conversely, sustainable economic growth may require a more buoyant rural economy and there is a risk that an over-concentration of opportunities in the higher order settlements may hinder this.</td>
<td>+</td>
<td>Option 3 would perform less well than Options 1 and 2 in terms of the potential efficiencies in respect of the co-ordination of services/ancillary services, facilities, infrastructure and accessibility for employees. Conversely, sustainable economic growth may require a more buoyant rural economy and in this respect Option 3 may, therefore, perform better. The extent to which new rural housing could support local business would be a key factor.</td>
<td>+</td>
<td>Option 4 would involve a proportion of the development continuing to take place within the main settlements, with the potential efficiencies in respect of the co-ordination of services/ancillary services, facilities, infrastructure and accessibility for employees. Conversely, sustainable economic growth may require a more buoyant rural economy and there is a risk that an over-concentration of opportunities in the higher order settlements may hinder this. The findings of the ELR suggests that an urban extension could be detrimental to the economy on the basis that it would not support the vitality and viability of existing settlements. An urban extension could support the development of new jobs as well as housing, however.</td>
<td>?</td>
<td>As a proportion of the new housing is to continue to be within the main settlements then it should also be closest to the main areas of employment. The new freestanding settlement would, however, contain a significant proportion of the housing required. The extent to which this would be supported by employment opportunities would depend on the location. The proposed new settlement at Dunsfold Park would be integrated with employment opportunities. Whilst this would be a positive element, the findings of the ELR suggests that a new settlement would be detrimental to the economy on the basis that it would not support the vitality and viability of existing settlements. This is likely to be a short to medium term negative impact. The longer term benefit would depend on the location and nature of development and would be likely to require substantial measures to address the potential for</td>
<td>-</td>
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### Sustainability Appraisal Objective 17: Enhance the image of the Borough as a business location

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<thead>
<tr>
<th>Option 1</th>
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<th>Option 2</th>
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<th>Option 3</th>
<th>Score</th>
<th>Option 4</th>
<th>Score</th>
<th>Option 5</th>
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</thead>
<tbody>
<tr>
<td>No option is likely to perform better than any other with respect to the image of the Borough since it is largely a matter of the detailed form and design of development. The importance of design guidance is noted for policy appraisal.</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to the image of the Borough since it is largely a matter of the detailed form and design of development. The importance of design guidance is noted for policy appraisal.</td>
<td>0</td>
<td>No option is likely to perform better than any other with respect to the image of the Borough since it is largely a matter of the detailed form and design of development. The importance of design guidance is noted for policy appraisal.</td>
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<td>0</td>
<td>No option is likely to perform better than any other with respect to the image of the Borough since it is largely a matter of the detailed form and design of development. The importance of design guidance is noted for policy appraisal.</td>
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### Sustainability Appraisal Objective 18: Encourage efficient patterns of movement

<table>
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<th>Option 1</th>
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<th>Score</th>
<th>Option 3</th>
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<th>Option 4</th>
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</thead>
<tbody>
<tr>
<td>Option 1 provides the best opportunity to reduce the need to travel since the four main settlements provide the best access to services and facilities in more remote areas.</td>
<td>+</td>
<td>Option 2 would perform less well than Option 1 in terms a strategy based on focusing development in the most accessible locations. Option 2 would, however, help sustain local facilities in second tier settlements and may</td>
<td>+</td>
<td>Option 3 would perform less well than Option 1 or Option 2 in terms a strategy based on focusing development in the most accessible locations. Option 3 would, however, help sustain local facilities in</td>
<td>+</td>
<td>As with Option 2 and Option 3 a positive element is the fact that a proportion of the new housing would continue to be provided within the main settlements where there is best access to jobs, education and</td>
<td>-</td>
<td>As with the other options, a positive element would exist if a proportion of the new housing were to be provided within the main settlements where there is best access to jobs, education and services. Depending on its size, a</td>
<td>-</td>
</tr>
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</table>
There is a risk, however, that over concentration of development in one area could exacerbate congestion. This could be a problem in Hindhead, Farnham and Godalming.

Second tier settlements and may provide a solution should issues concerning congestion arise in Option 1.

Services. An urban extension may be of sufficient size to support some limited services and infrastructure, but there would be an issue about access to a wider range of services. This would depend, in part, on where an urban extension is located and how accessible it is to this wider range of services. However, there is a potential negative impact if the residents of the urban extension had to travel by car in order to access jobs, education and services. If housing development were to be limited to within the main settlements and the single urban extension, it would not allow for much development in the villages. This would have a negative impact in instances where development in the villages was needed to support the retention of local services.

New freestanding settlement may be able to support some services and infrastructure, as was the case with the proposed freestanding settlement at Dunsfold Park. However, there would be an issue about access to a wider range of services. With a new settlement of the size proposed at Dunsfold Park, there would still be the need for residents to travel to access jobs, education, health facilities and recreation facilities. Notwithstanding what provision is made to improve rural public transport, the likelihood would be that many of these trips would have to be made by car.

Furthermore, as housing development would mainly be limited to within the main settlements and the new freestanding settlement, it would not allow for much development in the villages. This would have a further negative impact where development in the villages was needed to support the retention of local services.
### Sustainability Appraisal Objective 19: Encourage development of a sustainable tourism sector

<table>
<thead>
<tr>
<th>Option 1</th>
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<th>Option 3</th>
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<th>Option 4</th>
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<th>Option 5</th>
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</thead>
<tbody>
<tr>
<td>Option 1 entails a strategy based on focusing development in the most accessible locations. Whilst this would be likely to maximise the opportunities for the largest number of people, more flexibility may be necessary with respect to tourism.</td>
<td>+</td>
<td>Option 2 performs less well than Option 1 in terms of maximising accessibility to a full range of facilities and maximising opportunities for the largest number of people. However, it could perform better if it were demonstrated that some new facilities in the second tier settlements helped to sustain the rural tourism sector.</td>
<td>+</td>
<td>Option 3 performs less well than Options 1 and 2 in terms of maximising accessibility to a full range of facilities and maximising opportunities for the largest number of people. However, it could perform better if it were demonstrated that some new facilities in the villages would help to sustain the rural tourism sector.</td>
<td>+</td>
<td>In this Option, a proportion of the development would be likely to be within the main settlements. Could provide support to tourism in the area where provided, but may not respond to the wider needs of the Borough.</td>
<td>?</td>
<td>In this Option, a proportion of the development would be likely to be within the main settlements. Could provide support to tourism in the area where provided, but may not respond to the wider needs of the Borough.</td>
<td>?</td>
</tr>
</tbody>
</table>