

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	July 2016	Note on 'appraisal of reasonable alternatives - headline findings' presented to elected Councillors	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

KEY FINDINGS OF THE DRAFT SUSTAINABILITY APPRAISAL UNDERTAKEN FOR THE LOCAL PLAN

To provide some context, this document is being provided so that it can be demonstrated, at the examination, that members made a decision on the Local Plan that was informed by the Sustainability Appraisal findings. It should be noted that the Sustainability Appraisal findings support the Spatial Strategy in the Plan.

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Introduction

AECOM has been leading on a process of Sustainability Appraisal (SA) in support of the emerging Waverley Local Plan. An Interim SA Report was published for consultation alongside the 2014 'Scenarios' consultation document, and the SA Report will be published alongside the Proposed Submission Plan later this year (in-line with regulatory requirements). Central to the SA process is development, appraisal and consultation on 'reasonable alternatives', which in the context of a plan such as the Waverley Local Plan means 'spatial strategy alternatives'.

This brief note aims to introduce elected Councillors to the spatial strategy alternatives and present 'headline' appraisal findings. More information on the alternatives (i.e. an explanation of how they were arrived at, and ultimately an explanation of their 'reasonableness'), and detailed appraisal findings, will be presented within the SA Report.

The reasonable alternatives are presented within the table overleaf. In order to understand the alternatives there is a need begin with Option 4 - the Council's preferred option - and then 'work outwards', as there is a symmetry:

- Under **Option 4** the Council makes provision for c.9,900 homes over the plan period (519 dwellings per annum), the objectively assessed need (OAN), with 2,600 homes at Dunsfold Aerodrome and a strategy for greenfield expansion at each of the settlements that broadly reflects the capacity of available and suitable sites, as established by the Land Availability Assessment (LAA).
- Options 3 and 5 involve providing for 800 additional homes at greenfield sites, thereby either enabling the Council to deliver a smaller (1,800 home) scheme at Dunsfold Aerodrome (and still provide for OAN - see **Option 3**), or provide for a level of growth 800 homes above¹ OAN (with 2,600 homes at Dunsfold Aerodrome - see **Option 5**). The 800 homes would be distributed across 'LAA' sites at Milford, and 'non-LAA' sites at Farnham, Cranleigh and Haslemere.
- Options 2 and 6 are similar to Options 3 and 5, in that they would involve 800 additional homes at greenfield sites, thereby either enabling the Council to deliver a smaller (1,800 home) scheme at Dunsfold Aerodrome (and still provide for OAN - see **Option 2**), or provide for a level of growth 800 homes above¹ OAN (with 2,600 homes at Dunsfold Aerodrome - see **Option 6**). The difference is in respect of how the 800 additional homes are distributed. Under these scenarios Green Belt and AONB constraints are applied fully, which means a need to focus entirely at Farnham and Cranleigh.
- Options 1 and 7 would involve a much higher number of additional homes at greenfield locations, thereby enabling the Council to either deliver no housing development at Dunsfold Aerodrome (and still provide for OAN - see **Option 1**), or provide for a level of growth well above² OAN (with 2,600 homes at Dunsfold Aerodrome - see **Option 7**). Only one broad distribution for the additional homes can be envisaged, which would involve significant extensions into AONB and sensitive Green Belt.³

With regards to precisely how 'non-LAA' sites would be distributed (where necessary, i.e. for options other than Option 4), there can be no certainty; however, for the purposes of appraisal it is appropriate to make certain assumptions. For example (and perhaps most notably), for the purposes of appraisal there is an assumption that 'the first place to look' in the Farnham area is to Badshot Lea, where there is the possibility of delivering a strategic scale scheme.

¹ There will be unmet housing needs within the West Surrey Housing Market Area (HMA), given undersupply in Woking; hence a need to consider the option of providing for unmet needs. Options 5 and 6 would involve providing for up to 25% of Woking's unmet needs.

² Option 7 would involve providing for up to 70% of Woking's unmet needs.

³ Option 1 would involve 2,600 homes at non-LAA sites, whilst Option 7 would involve 2,200. This is reasonable, as providing 'OAN plus 2,600' would involve Waverley Borough planning to meet up to 83% of Woking's unmet needs; a figure that is unreasonably high (given that Guildford Borough is as well placed, if not better placed, than Waverley to provide for Woking's unmet needs).

The reasonable spatial strategy alternatives

N.B. Greyed-out cells show the 'constants'

	Option 1 OAN; nil at DA; all LAA sites at Milford/Witley; 2,500 at 'non-LAA' sites including sites constrained by GB and AONB		Option 2 OAN; 1,800 at DA; 800 at 'non-LAA' sites with GB and AONB constraints fully applied		Option 3 OAN; 1,800 at DA; all LAA sites at Milford/Witley; 700 at 'non-LAA' sites with GB and landscape constraints <u>less</u> fully applied		Option 4 OAN; 2,600 at DA		Option 5 OAN + 800; 2,600 at DA; all LAA sites at Milford/Witley; 700 at 'non-LAA' sites with GB and landscape constraints <u>less</u> fully applied		Option 6 OAN + 800; 2,600 at DA; 800 at 'non-LAA' sites with GB and landscape constraints fully applied		Option 7 OAN + 2,200; 2,600 at DA; all LAA sites at Milford/Witley; 2,100 at 'non-LAA' sites including sites constrained by GB and AONB	
	LAA	Non-LAA	LAA	Non-LAA	LAA	Non-LAA	LAA	Non-LAA	LAA	Non-LAA	LAA	Non-LAA	LAA	Non-LAA
Farnham	900	900	900	650	900	500	900	0	900	500	900	650	900	800
Godalming	50	500	50	0	50	0	50	0	50	0	50	0	50	400
Haslemere	70	500	70	0	70	50	70	0	70	50	70	0	70	400
Cranleigh	500	600	500	150	500	150	500	0	500	150	500	150	500	500
Milford/Witley	420	0	320	0	420	0	320	0	420	0	320	0	420	0
Other large villages	320	0	320	0	320	0	320	0	320	0	320	0	320	0
Small villages	140	0	140	0	140	0	140	0	140	0	140	0	140	0
Dunsfold Aerodrome	0		1800		1800		2600		2600		2600		2600	
Completions/ permissions/ windfall/ urban LAA sites ⁴	5000		5000		5000		5000		5000		5000		5000	
Total new homes over the plan period	9,900		9,900		9,900		9,900		10,700		10,700		12,100	

"OAN" = Objectively Assessed Need; "DA" = Dunsfold Aerodrome; "GB" = Green Belt; "AONB" = Area of Outstanding Natural Beauty;

"LAA" sites are those identified as suitable by the Land Availability Assessment. Conversely, "Non-LAA" sites are those identified as unsuitable by the Land Availability Assessment.

⁴ Completions/permissions are distributed as follows: Farnham 953; Godalming 786; Haslemere 360; Cranleigh 820; Milford/Witley 42; Other large villages 100; Small villages 245. Urban LAA sites are distributed as follows: Farnham 198; Godalming 160; Haslemere 210; Cranleigh 118; Milford/Witley 22.

Summary alternatives appraisal findings

The SA Report will present detailed appraisal findings, i.e. will present an appraisal of the alternatives against the appraisal 'framework' established through scoping⁵, formally ranking the performance of the alternatives in terms of each element of the framework and also concluding on 'significant effects'. The aim of the bullet points below is to present concise 'headline messages' only. Headline messages are as follows -

- The first point to note is that the 'bookend' options (**Options 1 and 7**) perform poorly in terms of a number of objectives, notably those relating to Biodiversity, Community and wellbeing, Heritage and Landscape objectives. In each case, this is on the basis that Waverley settlements are not well suited (in the sub-regional context) to supporting extensive growth.
- The second point to note is that **Option 4** (2,600 homes at Dunsfold Aerodrome; least growth at settlements) performs well in terms of the same objectives. Maximising development at Dunsfold Aerodrome is supported in terms of these objectives, and in particular in terms of 'Landscape'. However, there is some uncertainty in respect of 'Community and wellbeing' (is the site too isolated?) and 'Heritage' (will traffic impact significantly on surrounding historic villages?).
- There is also an argument that **Option 4** is best performing in terms of '**Economy**'; however, on balance it is determined that **Options 5 to 7** (which would involve supporting a higher growth quantum) perform equally as well. Whilst Option 4 is in-line with the Waverley Economic Strategy, a higher growth strategy is in-line with the wider objective of delivering housing to maximise employment growth opportunities within the sub-regional Functional Economic Area (FEMA). Option 1 also arguably has merit as there is a need for employee accommodation in close proximity to where the job opportunities are focused - i.e. at the main settlements, and to the north and west of the borough - however, there would be very little potential to deliver new employment land without Dunsfold Aerodrome.
- Higher growth options are also supported in terms of '**Housing**', recognising that Woking is set to provide for less than is necessary to meet OAN, thereby leading to unmet housing needs within the HMA. However, all options would result in 'significant positive effects' on the basis that Waverley's OAN target would be met (assuming delivery of sites as planned), and it may be that Woking's unmet needs can be met by Guildford (and/or an authority outside the HMA). Option 1 also arguably has merit as there is a need for housing in close proximity to where the needs arise - i.e. at main settlements. By contrast, Dunsfold Aerodrome (upon which there would be a particular reliance under Option 4) is relatively isolated, albeit there will be the opportunity to deliver specialist accommodation.
- Higher growth options are also judged to perform well in terms of '**Climate change**', simply because there would be a relative focus on larger, 'strategic-scale' schemes that would potentially deliver low carbon infrastructure, thereby helping to minimise per capita CO₂ emissions (from the built environment).
- With regards to '**Transport**', there is much uncertainty. One argument is that growth focused at existing settlements should be supported given the potential to travel by non-car modes; however, there is equally a need to minimise worsened traffic at existing hotspots, e.g. in-and-around Farnham.
- With regards to '**Water**', nil growth at Dunsfold Aerodrome could necessitate growth in the Badshot Lea area, where flood risk is an issue; whilst growth at Dunsfold Aerodrome leads to some uncertainties in respect of water supply and waste water treatment. As such, it is difficult to differentiate the alternatives.
- Finally, having established that the 'book-end' options perform poorly in terms of a range of objectives, and that Option 4 equally performs well in terms of a range of objectives, there is a need to consider **Options 2, 3, 5 and 6**; all of which would involve supporting c.800 homes at greenfield sites, over and above those supported under Option 4. The primary point to make is that Options 3 and 5 - which would involve distributing the 800 homes with less of a focus at Farnham - perform poorly in terms of 'Landscape' and (to a lesser degree) 'Biodiversity' given the need to support sensitive sites at Milford and Haslemere. However, diverting some growth from Farnham to Milford and Haslemere does have merit from transport perspective, and would also help to ensure certainty regarding delivery of sufficient Suitable Alternative Natural Greenspace (SANG) at Farnham (to mitigate recreations impacts to the Thames Basin Heaths).

⁵ See the SA Scoping Report at: http://www.waverley.gov.uk/info/1004/planning_policy/1739/sustainability_appraisal. The SA scope was also introduced within the 2014 Interim SA Report, and some work to update the SA scope has been undertaken since 2014. Notably, the decision has been taken to increase the focus on issues/objectives relating to 'transport and traffic'.