

**Sustainability Appraisal Report
of the
Spelthorne Development Plan -
Core Strategy and Policies DPD
and Allocations DPD**

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List of Abbreviations

LDF	Local Development Framework
LDD	Local Development Document
DPD	Development Plan Document
SPD	Supplementary Planning Document
LDS	Local Development Scheme
SCI	Statement of Community Involvement
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
PPP	Plans, Policies and Programmes
PPG	Planning Policy Guidance
PPS	Planning Policy Statements
IRF	Integrated Regional Framework
IMD	Index of Multiple Deprivation

PART I

PURPOSE AND CONTEXT OF SUSTAINABILITY APPRAISAL (Stage A)

1. Purpose of this Document

- 1.1 This document is a Sustainability Appraisal Report (SAR) which sets out the background to and the findings of the sustainability appraisal of the Core Strategy and Policies DPD and the Allocations DPD. These are the first two Development Plan Documents (DPDs) of the Spelthorne Development Plan.
- 1.2 The SAR is published to provide information to the public and other consultees; and to demonstrate how the requirements and advice of the Strategic Environmental Assessment Directive and the Guidance on the Sustainability Appraisal of Local Development Frameworks (ODPM November 2005) have been met.
- 1.3 This SAR describes the culmination of a process which has included the production of a Sustainability Appraisal Scoping Report, published in March 2005, and the subsequent appraisal of the options and allocations which were the subject of consultation from September to October 2005. This SAR is a revision of the Sustainability Appraisal Report which was produced in March 2006 for the consultation on the Preferred Options DPDs.
- 1.4 The SAR comprises four parts. Part I considers background information which is common to both DPDs, the 'Scoping' stage (Stage A of Sustainability Appraisal); Parts IIa and IIb detail the findings of appraisal of the Core Strategy and Policies DPD and Allocations DPD respectively (Stage B); Part III which recommends issues which should be monitored as part of the Annual Monitoring Report for the Development Plan (Stage E); and Part IV which provides an account of the procedure of sustainability appraisal¹.
- 1.5 SA Guidance advises that the key aim of a Development Plan Document (DPD) and the basis for appraisal should be an improvement on the situation which would exist if there were no DPD. Accordingly, the SAR describes how the process of appraisal has identified likely impacts of a range of options and how these findings have helped in deciding which strategy to take forward, which policies and allocations to include in the DPDs; and how the emphasis of policies can seek to maximise benefits and avoid adverse impacts.
- 1.6 The role of SA is to identify the implications of a DPD, but not necessarily to justify decisions. Should a DPD take forward an option or proposal that may not be the most sustainable, the implications of the favoured approach could be seen in the SAR. This would include a commentary concerning recommendations for mitigating any adverse impacts or improving related benefits.
- 1.7 Some policies have been carried forward from the adopted Spelthorne Local Plan as 'saved policies'. Although these policies are not formally part of the DPD they have been considered in the process of sustainability appraisal in order to ensure consistency with the overall strategic approach of the plan. The consideration of policies is set out in Section 4 of this SAR.

¹ Stages set out in DCLG Guidance on Sustainability Appraisal. Stage C is the production of the Sustainability Appraisal Report and Stage D is the consultation process.

The Spelthorne Development Plan

- 1.8 The Spelthorne Development Plan will comprise the Core Strategy and Policies DPD and the Allocations DPD. The Development Plan will be the new plan governing future development in the Borough, replacing the Spelthorne Borough Local Plan that was adopted in 2001.

Core Strategy and Policies DPD

- 1.9 The Core Strategy and Policies DPD sets out a spatial vision for the Borough for the period 2006 to 2026, the objectives and the strategic policies to deliver the vision, and the detailed policies which are intended to ensure development takes place in a manner which is consistent with the approach of the strategic policies.
- 1.10 The strategic policies set the overall direction of the Spelthorne Development Plan. They show how the planning vision and objectives will be implemented and establish a framework within which detailed policies and allocations can be developed. The strategy includes a policy for each of the following seven topics:
- Location of development
 - Housing provision
 - Economy and employment land provision
 - Town centres and retail development
 - Meeting community needs
 - Maintaining and improving the local environment
 - Climate change and transport
- 1.11 Detailed policies build on each of the seven strategic policies, identifying restrictions and criteria against which development proposals will be judged. The full detail of each policy is set out in the Core Strategy and Policies DPD.

Allocations DPD

- 1.12 The Allocations DPD identifies specific sites for uses which would help meet the development needs of Spelthorne.

2. Background legislation, process and consultation

- 2.1 The Planning and Compulsory Purchase Act 2004 requires individual Local Development Documents that form the LDF to be the subject of sustainability appraisal (SA) as part of the process of ensuring that they will contribute to sustainable development. Planning Policy Statement 12: Local Development Frameworks clarifies that SA can incorporate the requirements for a Strategic Environmental Assessment (SEA). SEA is required by Article 13.3 of European Directive 2001/42/EC (SEA Directive).

SEA Requirement

WHERE THIS SUSTAINABILITY APPRAISAL REPORT PROVIDES INFORMATION PURSUANT TO MEETING THE REQUIREMENTS OF THE SEA REGULATIONS, A TEXT BOX LIKE THIS WILL BE USED TO SIGNPOST THAT INFORMATION.

- 2.2 Appraisal documents have been prepared by an independent consultant working with members of the LDF team. In this way, the appraisal has been integrated within the plan making process whilst maintaining an element of independence.
- 2.3 The preparation of the two DPDs has comprised four main stages that are described below. These are distinct from, but informed by the SA Stages described at paragraph 1.4, above. Figure 1, page 8 identifies how the DPD production stages and the corresponding SA stages are progressed together.

DPD Stage 1: Pre-production

- 2.4 This stage involves survey and evidence gathering, including consultation on the scope of the SA (Stage A of the SA). Important social, environmental and economic interests are identified from which a set of Sustainability Objectives are established. These are distinct from the objectives of the plan, though they may in some cases overlap with them.

DPD Stage 2: Production

- 2.5 SA is progressed in tandem with the production of the DPD and with continuous community involvement. The first formal action in the production of the DPD is consultation on the issues and options, supported by an SA Progress Report² (Stage B of the SA). The SA Progress Report describes the likely impacts of options and helps to identify which perform best in terms of sustainability criteria as well as measures to address likely significant impacts should any option be taken forward.
- 2.6 Comments received are considered alongside other emerging issues and Preferred Options are identified. The Preferred Options are then the subject of a six-week period of formal public participation. A Sustainability Appraisal Report (SAR) is made available at this time and details the likely impacts of the Core Strategy and Policies being proposed (Stage C of the SAR). Measures to avoid adverse impacts and maximise benefits are suggested and the requirements for monitoring are proposed. Consultation comments are again considered and, finally a DPD prepared and submitted to the Secretary of State together with an amended SAR (Stage D of the SA).

DPD Stage 3: Examination

- 2.7 An Independent Examination considers whether the DPD is “sound”, that is, whether it has followed the required process and is based on robust evidence. The amended

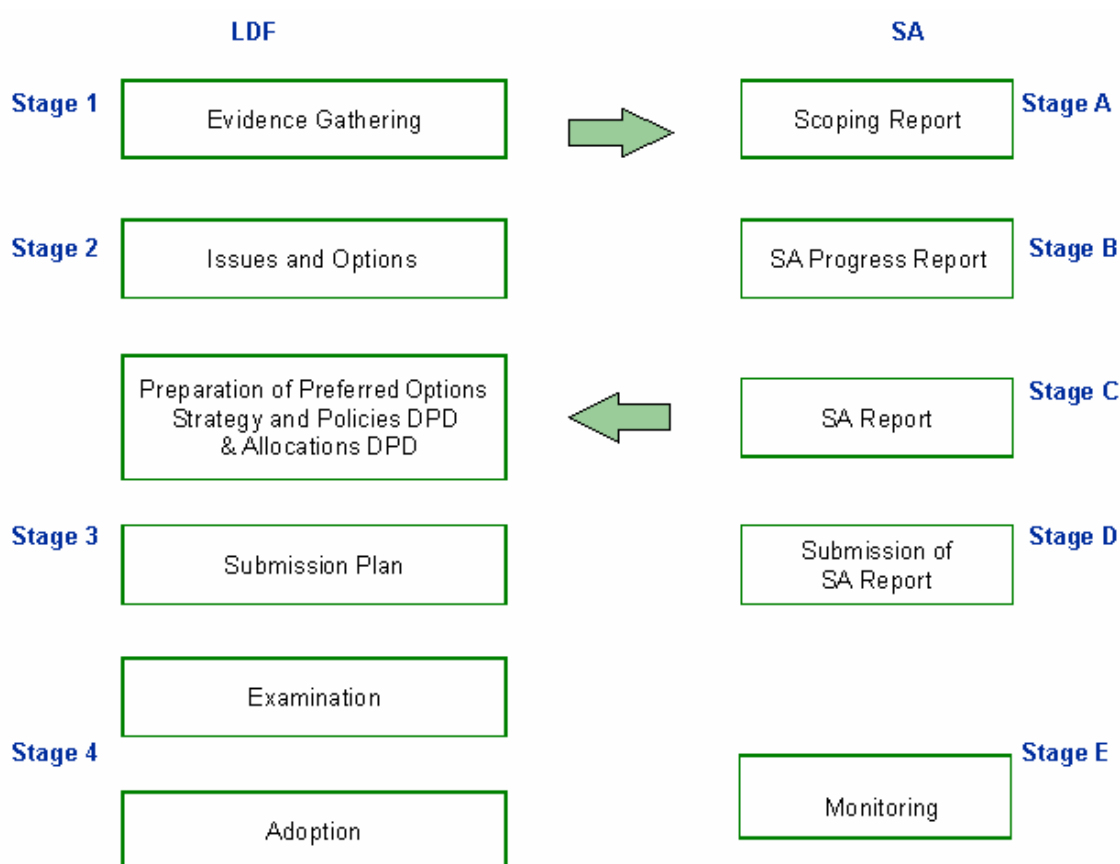
² Production of a an interim or Progress Report is no longer required under the final SA Guidance published by ODPM in November 2005

SAR is made available to the Examination Inspector and others who may wish to comment on the document.

DPD Stage 4: Adoption

- 2.8 A binding report will be produced by the Inspector after the Examination and adoption of the DPD follows. The implementation of the DPD will be monitored (Stage E of the SAR)

Figure 1 Flow diagram to Illustrate LDF and SA Process



Appropriate Assessment

- 2.9 Articles 6(3) and 6(4) of the Habitats Directive set out the decision-making tests for plans or projects affecting Natura 2000 sites (SPAs and SACs) such that any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.

- 2.10 Government Guidance³ was published in August 2006 in the form of a consultation document and further advice⁴, prepared by a number of consultants became available in September 2006. Spelthorne Borough Council has subsequently worked with Natural England and adjoining Local Planning Authorities to assess the potential effects of the emerging DPDs on a number of nearby Natura 2000 sites.
- 2.11 It has not been possible to fully integrate the appropriate assessment process into all the stages of the SA but consideration was given to all policies or allocations which might result in development within 3km of the boundary of an SPA/SAC, and consideration was given to the potential for significant effects on the integrity of any site. This in turn has helped inform a detailed “screening opinion” which has been recorded in a separate document (Appropriate Assessment – Draft Screening Opinion SBC April 2007). This has involved consideration of all the Natura 2000 sites within 15km of the Borough against the effects of the DPDs.
- 2.12 The key considerations were the significance of the effects of pollution, particularly from motor vehicles, on habitats and on water quality, together with effects from increasing levels of development, urbanization and recreational impacts. The Screening Opinion concludes that neither the Core Strategy and Policies DPD nor the Allocations DPD would have a significant effect on any SPA or SAC.

Consultation

SEA Requirement

Articles 5.4 and 6.3 of the SEA Directive require that the authorities which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.

- 2.13 Formal consultation has been undertaken with the environmental consultation bodies, community groups and social and economic bodies for the following documents:
- Scoping Report, March and April 2005
 - Sustainability Appraisal Progress Report, September 2005
 - Sustainability Appraisal Report, March 2006
- 2.14 Following initial consultation on DPD issues and options (SA Progress Report), the Council sought to improve the SA Framework by rephrasing and reorganising some of the SA Objectives. This also provided an opportunity to update objectives and indicators to reflect recent government documents, notably Securing the Future (the UK’s Sustainable Development Strategy 2005, Cm 6467) and PPS1, Delivering Sustainable Development (ODPM 2005).

³ ‘Planning for the Protection of European Sites’ Appropriate Assessment. DCLG August 2006

⁴ ‘Appropriate Assessment of Plans’, Scott Wilson, Levett Therivel, Treweek Environmental Consultants and Land Use Consultants, October 2006.

2.15 Details of the process of consultation are set out in Section 7 and the consideration of consultation responses is reported in Appendix 8.

Non Technical Summary of SA

2.16 A Non Technical Summary which describes the key findings of the Sustainability Appraisal of the Core Strategy and Policies DPD and the Allocations DPD is available as a separate document to this SAR.

Quality assurance

2.17 A Quality Assurance checklist has been used to identify where and how the SAR meets the requirements of the SEA Directive and SA Guidance. The consideration of the SAR against the checklist is set out in Part IV, Section 7.

3. The context and objectives for SA

The SA framework

- 3.1 The SA Framework comprises a set of Sustainability Objectives. The framework provides the basis for checking whether the objectives of a DPD are likely to contribute to sustainability.
- 3.2 An SA Framework was presented in the Scoping Report in March 2007. Following consultation, the SA Framework was revised. Consultation Bodies (Natural England⁵, English Heritage, and the Environment Agency) together with Surrey County Council were formally advised of the amendments and asked to verify that the SA Framework was fit for its purpose. Further details on consultation are provided in Appendix 8 of this SAR. The SA Framework has also been tested for internal compatibility to help identify areas where conflict may occur and whether there are opportunities to maximise benefits. The full details of the compatibility test are set out in Appendix 1.
- 3.3 For each SA Objective, a set of decision aiding questions has been established such that a greater degree of consistency can be achieved in appraisal. Appraisal has involved considering DPD objectives and policies against the framework. The findings are recorded in matrices (Appendices 2, 3, 4 and 5).

Table 1. SA Framework

Number	Objective	Decision aiding questions. Does the policy or proposal support:
1	Provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford	Provision of housing to meet RSS requirement? Provision of sufficient affordable housing? Reduction of households on the housing register? Reduction of unfit homes?

⁵ The original Consultation Bodies included English Nature and the Countryside Commission which were subsequently reorganized to form Natural England.

Number	Objective	Decision aiding questions. Does the policy or proposal support:
2	Facilitate the improved health and well being of the whole population	Reducing death rates from circulatory disease, cancer and suicide? Reducing the percentage of people whose health is classed as not good? Provision of Health Services and Extra Care Housing?
3	Reduce poverty and promote social inclusion	Reducing the score for Indices of Multiple Deprivation? Reducing the proportion of children under 16 living in income deprived households?
4	Create and maintain safer and more secure communities	Reducing the number of recorded offences (domestic violence, violence against the person, sexual offences, robbery, burglary, theft of motor vehicle, theft from motor vehicle, number of drug offences)? Reducing the percentage of people that live in fear of crime? Reducing number pedestrian/cyclists killed/seriously injured?
5	Minimise the harm from flooding	Reducing the number of properties at risk from flooding? Increase in properties linked to sustainable drainage systems?
6	Make the best use of previously developed land and existing buildings	Delivery of at least 60% of dwellings built on previously developed land? Delivery of an average of at least 30 dwellings per hectare?
7	Reduce land contamination and safeguard soil quality and quantity	Reduction of contaminated land? Maintaining area of grade 1, 2 and 3a agricultural land?
8	Ensure air quality continues to improve and pollution is reduced	Improvement in air quality (particularly NO ₂ and PM10)? Reducing the number of properties affected by poor air quality?
9	Minimise noise pollution	Reducing the number of residential properties affected by noise Increasing the total length of quiet road surfacing
10	Conserve and enhance biodiversity within the plan area	Maintaining the integrity of the South West London Waterbodies SPA? Maintaining or improving the extent and condition of land designated as a Site of Special Scientific Interest (SSSI)? Maintaining or improving the extent and condition of key habitats for which Biodiversity Action Plans have been established? Maintaining or improving the area and condition of Sites of Nature Conservation Importance (SNCIs) and Local Nature Reserves (LNRs)?
11	Protect and enhance the natural, archaeological and historic environments	Protecting listed buildings, ancient monuments and conservation areas? Achieving Accessible Natural Greenspace Standards? Archaeological assessment and/or mitigation?
12	Improve accessibility and reduce road congestion and the need to travel	Reducing the amount of traffic? Increasing travel to work/school by foot, cycle or public transport? Provision for disabled access to all transport options?
13	Maintain high levels of employment and economic activity	Reducing the percentage of economically active people who are unemployed? Increasing the number of VAT registrations?
14	Provide for appropriate commercial development opportunities to meet the needs of the economy	Retention of well located employment sites? Maintaining or increasing the total quantity of commercial floorspace? Maintaining or increasing the total quantity of retail floorspace?

Number	Objective	Decision aiding questions. Does the policy or proposal support:
15	Support economic growth which is inclusive and sustainable	Improving the level of qualification? Reducing proportion of adults (16-60) with poor literacy and numeracy skills? Balancing the employment ratio (in to out commuting)?
16	Achieve sustainable production and use of resources	Existing allotment sites and improving occupancy? Increasing number of businesses and people producing food? Reducing the amount of waste disposed of in landfill? Reducing waste collected per capita? Increasing reuse and recycling demolition waste? Reducing household per capita consumption of water? Increasing greywater/rainwater harvesting? Minimising light pollution? Reducing energy use per capita? Homes meeting Code for Sustainable Homes Level 3? Commercial buildings meeting BREEAM Excellent? Buildings incorporating CHP heating?
17	Maintain and improve the water quality of the region's rivers and groundwater	Increasing the percentage of rivers in the plan area whose biological quality is rated as good? Increasing the percentage of rivers in the plan area whose chemical quality is rated as good
18	Increase the production and use of renewable energy/fuels	Increasing the installed capacity for energy production from renewable sources?

Relevant policies, plans and programmes, and sustainable development objectives

SEA Requirement:

The Environmental Report should provide information on:

- the relationship of the plan or programme with other relevant plans and programmes (Annex I(a))
- the environmental protection objectives, established at international, [European] Community or [national] level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation (Annex I (e))

3.4 The relationship between the DPD and other policies, plans, programmes and sustainability objectives at international, national, regional and local level has been an integral part of appraisal. Relevant matters from other plans were first considered in the Scoping Report and have helped set the context and detail of the SA Framework. In this way and with advice and verification from the Consultation Bodies, the key requirements and good practice set out in other plans have been taken into account in appraising policies and proposals. Appendix 6 sets out a list of the other plans and programmes which are relevant and have influenced the scope and context for appraisal. Where other plans have had a significant influence on the findings of the SA, this has been referred to in the account of sustainability issues below.

Social, economic and environmental baseline characteristics

SEA Requirement

The Environmental Report should provide information on:

- relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme and the environmental characteristics of the areas likely to be significantly affected (Annex I (b), (c))
- any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC (Annex I (d))

- 3.5 A baseline of the social, environmental and economic conditions in Spelthorne has been established through the Scoping Report. The baseline comprises data for specific indicators which have been selected to provide information relevant to each of the 18 SA Objectives. This background data is provided in Appendix 7.
- 3.6 Baseline information provides a basis for taking an objective view on the likely impact of policies on each SA Objective. Since the baseline also provides comparative data for conditions in other areas and information about trends, a judgement can also be made concerning the significance of such an impact. The key issues emerging are discussed below.
- 3.7 A number of background reports have been produced since the Scoping Report was published. The reports cover air quality, transport, the SPA, flood risk, the economy, housing and flood risk and information from them supplements the following consideration of sustainability issues. Expertise continues to develop and further assessments will be made available. It is considered appropriate, therefore, to review the information available as part of the ongoing process of monitoring the Spelthorne Development Plan. This would include replacing or amending indicators.

Sustainability issues

SEA Requirement

Article 5.1 of the SEA Directive requires that an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.

Information to be provided in the Environmental Report includes an outline of the reasons for selecting the alternatives dealt with (Annex I (h))

- 3.8 Key issues for the Core Strategy and Policies DPD have emerged through a consideration of baseline information, of the requirements of other plans and through extensive consultation on a Scoping Report and an initial Sustainability Appraisal

Report. These are set out below under the headings of the 18 SA Objectives. In this way it will be clear which issues have been taken into consideration when making appraisal judgements. Reference is made to other plans where they have influenced the issue discussed and to specific indicators where they provide the basis for an opinion. Comments made during consultation are also included.

SAO1: Provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford

- 3.9 The Draft South East Plan 2006 to 2026, March 2006 (the draft SEP) considers that the affordability of housing, particularly for key workers, is a significant issue in the South East Region⁶. Baseline data (Appendix 7) confirmed this to be the position in the Borough, indicating that house prices are high relative to wages. The Housing Market Assessment (January 2007) which draws on the 2006 Housing Needs Survey, approximates that an average of 72 households are added to the Housing Register every year and reports that Affordable Housing will be required to meet this increase.
- 3.10 The population forecast to 2026 is for little change in absolute numbers. Whilst a gradual decline (3% over the period 2006 to 2026) is predicted, there is likely to be an increase in the over 50s population with a significant increase in the over 85s. Housing to meet the needs of the elderly is considered, therefore, to be a significant issue. The number of economically active is projected to fall, although the population would remain steady to 2021 after which the decrease would be about 1700 in five years.
- 3.11 Planning Policy Statement 3, Housing has been issued since preparation of the DPD began. In addition to affordable housing and meeting the needs of the elderly, PPS3 emphasises the importance of quality of design. The Code for Sustainable Homes has also been issued, further emphasising the importance of materials, layout and sustainable design features, a subject discussed in more detail under SA Objective 16 and SA Objective 18.

SAO2: Facilitate the improved health and well being of the whole population

- 3.12 It is reported in the draft SEP SAR that the health of people in the South East Region is relatively good and not, therefore, a significant issue for regional policy. The vision of the Spelthorne Community Plan (2005 - 2015) is to 'make Spelthorne a safe, healthy, inclusive, prosperous and sustainable community'. The key objectives include improving health, building community relationships and improving services for the ageing population.
- 3.13 Baseline data suggests that localised poor air quality⁷ and the rising population of elderly people are issues which need to be addressed in. In addition, the predicted effects of climate change, such as an increase in the incidence of severe weather events, may have an affect on health. The nature of the predictions is discussed in more detail under SA Objective 5, SA Objective 16 and SA Objective 18.

SAO3: Reduce poverty and promote social inclusion

- 3.14 Whilst employment, vibrant communities and cultural activities are all considered to be strengths of the South East Region, it is reported in the draft SEP SAR that pockets of

⁶ Section 4 of the draft South East Plan Sustainability Appraisal Report

⁷ Detailed Air Quality Assessment for Spelthorne, 26th April 2006 (CERC)

poverty and social exclusion exist. At the Borough level, IMD data suggests that some areas around Stanwell, Staines, Ashford and Sunbury Common suffer from deprivation that has an adverse impact on quality of life. The main issues of relevance to SAO3 are poor employment levels, low levels of education and skills and crime and disorder.

- 3.15 In addition, the Open Space, Sport and Recreation Study, September 2005 shows that whilst Spelthorne is well provided for in terms of the total amount of open space as well as specialised types of provision, such as Staines Moor and the River Thames there are localised problems and issues in certain areas. An important issue that the Spelthorne Development Plan should seek to address is the quantity, quality and accessibility of amenity green space across the Borough.
- 3.16 The Spelthorne Community Plan identifies building community relationships and increasing basic skill levels as further key challenges for the Borough. PPS6 requires development plans to promote social inclusion, ensuring that communities have access to a range of main town centre uses, and that deficiencies in provision in areas with poor access to facilities are remedied.

SAO4: Create and maintain safer and more secure communities

- 3.17 The reduction of crime, addressing the fear of crime and improving safety are key objectives of the planning system, although the draft SEP SAR does not consider these to be significant issues at the regional level. Baseline data in Appendix 7 confirms that the incidence of crime is not significant at the Borough level, although the related issues of good quality design and social inclusion are matters which will be considered under SA Objectives 3 and 16 respectively, and can address the fear of crime.
- 3.18 The vision of the Spelthorne Community Plan (2005 to 2015) identifies building community relationships as a key challenge and PPS6² considers promoting social inclusion and high quality design to provide attractive and safe environments to be key objectives.

SAO5: Minimise the harm from flooding

- 3.19 Water management and flooding have emerged as significant issues in the draft SEP SAR and climate change predictions indicate a likely increase in the occurrence of flooding events as more rain is predicted to fall in shorter, more intense periods. For Spelthorne this will require management of flood risk areas to mitigate the impact, including avoidance of inappropriate development in the floodplain and control of run-off from hard surfaces in urban areas; particularly considering that a significant area of Spelthorne lies in the floodplains of the Rivers Thames, Colne (and related river system) and Ash. Flood defences are limited.
- 3.20 PPS25⁸ has been issued since preparation of the DPD commenced, emphasising the key role of planning in water management and stressing the importance of recognising the likely impacts of climate change. PPS1 Companion Guide on Climate Change (consultation document⁹) considers that securing sustainable drainage systems (SUDS), the potential contribution of water harvesting from impermeable surfaces and accommodating waste water recycling are important and inter-related issues.

⁸ Planning Policy Statement 25, Development and Flood Risk, December 2006

⁹ Planning Policy Statement: Planning and Climate Change Supplement to PPS1, December 2006

- 3.21 A Strategic Flood Risk Assessment was undertaken by consultants with advice from the Environment Agency. The methodology was based on the advice in the draft PPS25 (December 2005) An agreed document was finalised in December 2006 and its findings have been summarised in the document 'Spelthorne Strategic Flood Risk Assessment Part II'.
- 3.22 The SFRA shows that 23.2% of the Borough (and 14.1% of its existing urban area) is at risk in a 1 in 100 year flood event (Zone 3) and 48% of the Borough is at risk in a 1 in 1000 year flood event (Zone 2). The 1 in 1000 flood risk area is broadly equivalent to the 1 in 100 + 20% for climate change and the maximum of the two outlines is taken to define flood Zone 2. The 1:100 year flood risk area affects over 5,600 residential properties and large employment areas including about half of Staines town centre.
- 3.23 SFRA Part II interprets the full SFRA in the context of the Spelthorne Development Plan and considers the sequential approach to locating new development to avoid flood risk. Parts of the main centres in the Borough do not meet the requirements of the sequential test, but relocation of key services and functions away from the major centres is unrealistic. In addition, the positive contribution which these centres make to other sustainability objectives such as accessibility and using previously developed land suggest that it would be appropriate to consider some locations to be taken forward in the Allocations DPD on the basis of the exceptions test. Land in areas at higher flood risk – 1:20 (referred to in PPS25 as 'functional flood plain' or Zone 3b) would not, however, be appropriate for further consideration since these are areas of generally fast flowing floodwater where there are particular risks to people and property.

SAO6: Make the best use of previously developed land and existing buildings

- 3.24 The SAR of the draft SEP identifies the use of previously developed land (pdl) as a key issue for the Region. PPS3¹⁰ requires at least 60% of new housing to be on pdl and sets a minimum density of 30 dwellings per hectare. Evidence from annual monitoring indicates that Spelthorne is achieving almost 100% of development on pdl and can achieve higher densities.

SAO7: Reduce land contamination and safeguard soil quality and quantity

- 3.25 National policy aims to minimise the loss of farmland, particularly the best and most versatile land (grades 1, 2 and 3a) with PPS7¹¹ requiring this to be taken into account alongside other sustainability considerations. Combining this objective with the issues identified under SA Objective 6, there is a strong emphasis on reusing land in existing urban centres. For Spelthorne this would inherently mean using land which may be contaminated from a previous use. Given the requirements and provisions in PPS23¹² surveys for contaminated land would be needed prior to development proposals being taken forward and appropriate remediation measures implemented where necessary.

SAO8: Ensure air quality continues to improve and pollution is reduced

- 3.26 The draft SEP reports that air quality in the Region has improved over recent decades, but that locations exist with poor air quality largely due to emissions from transport,

¹⁰ Planning Policy Statement 3, Housing, 2006

¹¹ Planning Policy Statement 7: Sustainable Development in Rural Areas, 2004

¹² Planning Policy Statement 23, Planning and Pollution Control, 2004

trans-boundary pollution and high ozone levels. It is recommended that spatial planning can help to address the causes of poor air quality through influencing movement, mode and management of transport. Planning can also help guide the location of development away from areas of poor air quality.

- 3.27 The whole of the Borough is designated as an Air Quality Management Area primarily due to levels of nitrogen dioxide (NO₂) and particulates (PM10) from traffic. The Air Quality Assessment reports that there are particular concentrations of pollution from NO₂ in parts of Staines and around the Sunbury Cross junction at Sunbury and other parts of the A308. The level of particulates is a concern adjoining the M25 and Heathrow Airport.
- 3.28 The Council's Air Quality Management Action Plan, Community Plan and the County Council's Local Transport Plan already have policies and actions to encourage alternatives to car use to help combat the air pollution problem and the DPD will need to contribute to these where it can. The Spelthorne Community Plan (2005 to 2015) identifies the reduction of pollution and improving health as two of the key challenges for the Borough. This would include a reduction in climate change emissions.

SAO9: Minimise noise pollution

- 3.29 In the north of the Borough there are areas suffering high levels of noise associated with Heathrow Airport (within the 66Leq contour); in particular at Stanwell Moor and the northern part of Stanwell. Housing development is restricted in this area to one for one replacement only. The M25 and M3 are also major sources of noise.
- 3.30 PPG24¹³ requires plans to include provision to locate noise-sensitive developments away from existing sources of significant noise (or programmed development) and that potentially noisy developments are located in areas where noise will not be such an important consideration or where its impact can be minimised.

SAO10: Conserve and enhance biodiversity within the plan area

- 3.31 PPS1 requires that in preparing development plans, planning authorities should seek to enhance as well as protect biodiversity, natural habitats, the historic environment and landscape and townscape character. The delivery of urban open space which incorporates measures to improve biodiversity and landscape would deliver multiple benefits.
- 3.32 PPS9 stresses the importance of biodiversity in policy and development decisions and emphasises the importance of the hierarchy of sites from international to local level and the need to protect all such sites. Additionally in its consultation response Natural England confirmed the importance of access to natural and semi natural green space.
- 3.33 A major part of the South West London Waterbodies Special Protection Area is located within the Borough and the effect of the plan and allocations on the integrity of the SPA will require careful consideration through the process of "Appropriate Assessment".

¹³ Planning Policy Guidance 24, Planning and Noise, September 1994

SAO11: Protect and enhance the natural, archaeological and historic environments

3.34 In their response to consultation on the scope of sustainability appraisal (Scoping Report 2005), English Heritage advises that a wide definition of the historic environment should be used which includes not only those areas and buildings with statutory protection, but also those which are locally distinctive, valued and important; and that the historic environment is more than a cultural or environmental asset, it is an important driver for economic regeneration, helps to build social cohesion and provide a better quality of life for all. The draft RSS SAR considers that protection and enhancement of the historic environment is a significant issue for the Region and the Countryside Agency has advised that landscape character and quality are related issues (see also SA Objective 3).

SAO12: Improve accessibility and reduce road congestion and the need to travel

3.35 Traffic congestion is a major problem and Surrey County Council (SCC) has set limits to growth in the Local Transport Plan. A high level, strategic assessment, using methodology agreed with the Highways Agency and SCC, is reported in a Transport Statement (January 2007) and concludes that with 3020 new dwellings in the period up to 2026, the greatest impact would be associated with housing. Given the requirements of forecast population, it is likely that the majority of new homes will be small units, many of which will be extra care sheltered housing. Furthermore, it is likely that 60% of development will continue to be on small employment sites and existing residential areas. On this basis that the Transport Statement predicts the potential for a small net drop in traffic from residential development.

3.36 It is concluded for employment sites that transport policies will restrain any growth through limiting parking and encouraging use of public and other shared transport. The impact of the proposed extension of the Elmsleigh Centre is not considered to be significant since, with predominantly retail uses, it is unlikely there would be a noticeable impact on the morning peak traffic.

3.37 Improving accessibility by alternatives to the car would also deliver benefits to air quality, the economy and social inclusion and forms a key contribution of the planning strategy to addressing the causes of climate change. On this final matter, PPS1 requires development plans to ensure full consideration is given to creating and securing opportunities for sustainable transport in line with PPG13¹⁴ including through the preparation and submission of travel plans; providing for safe walking and cycling, and where appropriate secure cycle parking and changing facilities; and an appropriate approach to the provision and management of car parking. The Spelthorne Community Plan also identifies sustainable transport objectives as significant issues to be addressed.

3.38 In their response to consultation on the Scoping Report 2005 the Highways Agency advises that alternatives to the car, such as public transport, cycling and walking, reducing congestion and encouraging schools and businesses to draw up green travel plans are top priorities.

¹⁴ Planning Policy Guidance 13: Transport, March 1994

SAO13: Maintain high levels of employment and economic activity

- 3.39 Employment, economic growth and competitiveness, and tourism are issues which the draft RSS SAR concludes are not significant issues relevant to regional strategic planning in terms of sustainability appraisal. High levels of employment in the Borough suggest this is also the case at the local level. The vision of the Spelthorne Community Plan (2005 – 2015) is, however, to ‘make Spelthorne a safe, healthy, inclusive, prosperous and sustainable community’. The issue for planning is considered to be ensuring economic strength is maintained in the long term and this is best addressed under SA Objective 14, below.

SAO14: Provide for appropriate commercial development opportunities to meet the needs of the economy

- 3.40 The latest forecasts show a small rise in the resident workforce of 430 to 2016. With increased commuting to opportunities at Terminal 5, Heathrow, it is anticipated that the resident workforce seeking employment in the Borough would fall by about 700 by 2016. With a predicted rise in employment opportunities of 4,600 to 2016 and a further 3,300 by 2026, the excess demand for labour would be in the region of 5,300. Any significant growth in jobs in the Borough at 2016 would need to be filled by either more people living in the area or more in commuting. This indicates that the position of full employment could withstand a small reduction in the number of jobs supported by existing commercial premises. The requirement for a more skilled and flexible workforce, however, indicates a need to improve skills.
- 3.41 The draft SEP considers that the long term provision of well located commercial premises is important to sustainability. Five larger employment sites and the centres of Staines, Ashford, Shepperton and Sunbury Cross are consequently recommended to be retained as employment areas. Where smaller employment sites are less well located, such as within existing residential areas, a change of use to housing would be sustainable.
- 3.42 The buoyancy of the market for housing and the low level of interest in new employment development have led to pressure to change the use of existing employment land and a market preference for housing on new development land, should it become available. To ensure that the local economy remains strong, it is important to consider the potential impact in terms of ensuring adequate supply of employment land in the long term.

SAO15: Support economic growth which is inclusive and sustainable

- 3.43 Whilst the draft RSS SAR concludes that education and skills are not significant problems to be addressed by regional spatial planning, it is considered that at the Borough level the improvement of skills is part of the solution to address wider social issues. The vision of the Spelthorne Community Plan (2005 - 2015) is to ‘make Spelthorne a safe, healthy, inclusive, prosperous and sustainable community’ and identifies building community relationships and increase basic skill levels as key challenges for the Borough. It is considered that the issue is best addressed under SA Objective 3, above.
- 3.44 Thames Water has commented on the importance that development is planned and phased to consider the impact on water supplies and wastewater treatment, and has

confirmed that there are no general infrastructure capacity issues in Spelthorne or at treatment works for the scale of development proposed.

SAO16: Achieve sustainable production and use of resources

- 3.45 The SAR of the draft South East Plan identifies resource consumption, climate change, waste management and water management as significant issues and that key measures would include securing sustainable drainage systems, water harvesting from impermeable surfaces and encouraging layouts which accommodate waste water recycling; requiring provision for sustainable waste management. Policy CC4 of the Draft South East Plan identifies specific sustainable design features and techniques.
- 3.46 The Code for Sustainable Homes has been introduced since preparation of the Plan began, consolidating the aims and role of BREEAM standards for commercial buildings. New building will be encouraged to meet these, and other higher standards yet to be adopted at the national level, throughout the life of the Plan. In addition to the general objectives described above, building design will be required which can withstand severe weather events such as strong winds, heavy rain and floods, and drought; both physically as a structure and functionally as a comfortable place of work or home.

SAO17: Maintain and improve the water quality of the region's rivers and groundwater

- 3.47 Baseline data in Appendix 7 indicates that the biological and chemical condition of water courses in Spelthorne is not an issue which is significant in terms of the context of sustainability appraisal.
- 3.48 A positive contribution is required to improving water quality, however, and the Climate Change Companion Guide to PPS1 specifically identifies consideration of provision to secure sustainable drainage systems, water harvesting from impermeable surfaces and encouraging layouts that accommodate waste water recycling.
- 3.49 In their response to consultation on the scope of sustainability appraisal the Environment Agency identifies taking opportunities to deliver benefits for recreation and tourism opportunities, and meeting the provisions of EU Directives on water quality, specifically EU Freshwater Fisheries Directive & EU Urban Waste Water Treatment Directive as important.

SAO18: Increase the production and use of renewable energy/fuels

- 3.50 This SA Objective is effectively a sub set of SA Objective 16, although the importance of its specific role in tackling fuel poverty and addressing the causes and consequences of climate change mark it out as a significant matter in its own right. , Planning and Climate Change (Supplement to PPS1) emphasises the role of a Design and Access Statement in demonstrating how proposed development will comply with and improve upon the target carbon emission rate applicable through Building Regulations; and in particular, the contribution to be secured through decentralised energy supply systems including on-site renewable sources. It will be necessary for the DPD to create the circumstances whereby renewable energy and energy efficiency can be delivered and establish how planning conditions or planning obligations will be used to secure the longer-term management and maintenance of those aspects of a development.

Testing the SA Framework for Internal Compatibility and Testing DPD Objectives for Internal Compatibility

- 3.51 The original SA Objectives were tested against each of the other SA Objectives and the original DPD Objectives were similarly tested against themselves to identify whether any internal compatibility issues existed. A key outcome of testing was the reorganisation of the SA Objectives (Table 1) and an addition of one DPD Objective. These actions also addressed some issues which were raised during consultation on the Scoping Report (see Appendix 8).
- 3.52 Internal testing of the DPD Objectives revealed an inherent conflict between physical development and the natural environment. This is epitomised by the desire to restrict development in the green belt, near or in important habitats and areas prone to flood. The potentially adverse impact of more housing and commercial development on traffic generation and, consequently, air quality underlined the importance of seeking to address transport as a priority. The locational strategy emerged as key to this issue.
- 3.53 The revised DPD Objectives were not tested for internal compatibility since the only amendment was to add the objective of minimising noise impact, making 21 objectives in total. It is considered that this would be compatible with any of the other DPD Objectives. In addition, the plan making process had begun to identify options for delivering the DPD Objectives and it was these options which required testing. The findings of the original appraisal of the DPD Objectives are summarised in tables set out in Appendix 1. The revised SA Objectives were retested and the findings of this test are also set out in Appendix 1.
- 3.54 When comparing the original SA Objectives against each other it was clear that strong potential existed for mutual benefits. Notable examples include that by reducing road congestion, air quality would improve; and that enhancing biodiversity and preserving the historic, built and natural environment would support each other. Potential conflict was identified, however, and this was predominantly due to the requirement to provide more housing in a Borough with environmental constraints of flooding, Green Belt and open space, and nature conservation. The complexity of relationships between objectives is demonstrated, however, by the possibility that SA Objective 6, 'to make the best use of previously developed land' could in some circumstances be detrimental to interests of preserving biodiversity, improving air quality, avoiding flood risk and protecting the historic environment. It is noted that a key role of appraisal would be identifying mitigation and where benefits could be delivered. Notable examples include taking advantage of a concentration of activity in the existing centres to improve public transport; and setting out clear design criteria to address matters such as noise attenuation and planning for biodiversity.
- 3.55 The most significant change to the SA Objectives was to merge education issues with economic indicators to form an objective that considers 'smart growth'. This new SA Objective includes the national objective of high employment, but also addresses the local circumstances whereby the economy would benefit from a more skilled local workforce. This could address the local match of skills to jobs, which may also help to reduce the levels of commuting both in and out of the Borough. Smart growth would also use innovation and technology to tackle issues such as traffic congestion and avoid adverse impacts on the environment.

- 3.56 The need to address the causes and consequences of climate change was found to be common to all SA Objectives. A specific SA Objective was not, therefore, considered necessary.
- 3.57 Testing the revised SA Objectives identified that the fundamental incompatibility between preserving resources and delivering physical development (housing and commercial property) remains and that a key role of appraisal would be to identify how policy could seek to resolve this where possible. It is considered that the revised SA Objectives provide greater clarity to ensure that the key issues are considered fully in appraisal of options.

PART IIa

PREDICTED IMPACTS OF THE CORE STRATEGY AND POLICIES DPD (Stage B)

4. Developing and refining options and assessing effects

SEA Requirement

Article 5.1 of the SEA Directive requires that an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.

Information to be provided in the Environmental Report includes an outline of the reasons for selecting the alternatives dealt with (Annex I (h))

Predict impacts of the Core Strategy and Policies DPD

- 4.1 Judgements have been made with respect to the likely effects of policies in terms of the 18 SA Objectives and this section of the SAR presents the predicted social, environmental and economic impacts under headings of the seven Strategic Policies.
- 4.2 Appraisal has not just been undertaken for the policies proposed in the submission DPD, but has involved a four stage process whereby the findings of appraisal have been taken into account by the policy making team when making decisions concerning which options to take forward; and in drafting the strategic and detailed policies:
- Appraisal of DPD Objectives
 - Appraisal of Options for delivering the DPD Objectives
 - Appraisal of the seven strategic policies proposed in the Preferred Options DPD
 - Consideration of how well the detailed policies support the objectives of sustainable development
- 4.3 The full detail of appraisal from each stage has been recorded in a set of matrices which are provided as Appendices 1, 2, 3 and 4. In forming judgements, reference has been made to the baseline information and key issues described in Section 3, above. Predictions are described in terms of their magnitude, their geographical scale, the time period over which they will occur, whether they are permanent or temporary, positive or negative, probable or improbable, frequent or rare, and whether or not there are secondary, cumulative and/or synergistic effects. The focus is on likely significant impacts of the DPD and this section also provides an account of the difference that the policies in this DPD are predicted to make.

Testing revised DPD Objectives against the SA Framework

- 4.4 In testing the revised DPD Objectives against the SA Objectives it was found that the conflict remained with reconciling the need for development with the need to enhance biodiversity, improve design, and deliver infrastructure needs as well as incorporating good sustainable development principles.

- 4.5 As with testing the SA Objectives, addressing the transport consequences of the locational strategy is a clear priority and it was considered that smart growth, whereby land would be redeveloped for the most appropriate use or mix of uses and seek to maximise the benefits of the local circumstances, would make a positive contribution.
- 4.6 One DPD Objective has been added since initial testing and that is to minimise the impact of noise on local communities and the environment. Whilst this was not identified as a significant issue through appraisal, the objective is considered to support the improvement of health and well being for all.

Appraisal of strategic options considered

SEA Requirement

The environmental report shall include information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, and its stage in the decision-making process (Article 5.2)

Information to be provided in the Environmental Report includes:

- a) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects (Annex I (f) and footnote)
- b) an outline of the reasons for selecting the alternatives dealt with (Annex I (h))
- c) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme (Annex I (g))

- 4.7 The options identified for delivery of the DPD Objectives have been tested against the SA Framework and the findings of this appraisal are set out in Appendix 2. The following commentary summarises the sustainability considerations which have helped inform the preferred options for the core strategy and policies that are proposed in the DPD as well as the reasons for rejecting other options.

Strategic Policy SP1, Location of development (supplemented by detailed policies L01 and LO2)

Options considered

- 4.8 Strategic Policy SP1 takes forward Option 1a rather than allowing development in the Green Belt (Option 1b) since the latter would be likely to place development at locations less conducive to sustainable transport, result in an unacceptable loss of open land outside settlements and introduce light and noise pollution where it is not currently an issue. On the basis of the evidence presented in the Strategic Flood Risk Assessment the DPD takes forward a strategy that is a combination of Option 2a (no housing in any area liable to flood) and Option 2b (employment uses in flood areas

where this does not increase risk) whereby limited exceptions to development in flood risk areas are allowed. Policy seeks to deliver betterment by allowing redevelopment in some urban areas liable to flood.

- 4.9 The emphasis of the strategy is for locations that support the objectives of sustainable transport (a mixture of Options 3c, 10a, 11a, 12 and 13). Option 12b which promotes locations most accessible to car users, regardless of accessibility by other modes, is not taken forward since this would be likely to increase car use and add to congestion problems.

Amendments made to the DPD and other sustainability considerations arising at the Preferred Options Stage (Regulation 26 Consultation)

- 4.10 Detailed mapping of fluvial flooding, as provided by the Environment Agency, was used at the Regulation 26 stage and a strategy was proposed to address flooding. The amended Strategic Policy SP1 for the submission DPD provides clearer guidance and criteria, however, since a comprehensive Strategic Flood Risk Assessment (SFRA) has been completed. The key consideration is that housing should not be located in the Flood Risk Area Zone 3 unless it can be demonstrated that land is not available in Zones 1 or 2. In such circumstances following the application of the sequential test, exceptions would need to be expressed in terms of economic and social benefits as well as other environmental benefits. The role of Staines as a second tier Sub Regional Centre is one such consideration which has led to policy expressing the need to focus on the delivery of betterment through redevelopment but for non-residential uses. Taking the strategy forward into the Allocations DPD, each site allocation will need to detail conformity with the sequential test of PPS25 and, where sites are proposed in Zone 3, details of how the exceptions test can be met should be provided.
- 4.11 A more detailed Transport Statement has also been completed and this confirms that the strategy is appropriate and capable of delivering reduced congestion within the context of improved public transport.
- 4.12 The SAR commented on the need for stronger policy for sustainable design. Strategic Policy SP7 and CC1 now refer to the recently issued Code for Sustainable Homes, including specific reference to addressing flood risk and delivering renewable energy; and it is not considered necessary to make reference in Strategic Policy SP1.

Strategic Policy SP2, Housing Provision (supplemented by detailed policies H01, H02, H03, H04, H05, H06 and H07)

Options considered

- 4.13 A location specific approach to density (Option 8d) is favoured against Options 8b and 8c since it provides clarity and certainty and densities appropriate to their location.
- 4.14 Evidence from the Council's Housing Needs Assessment suggests that any reduction in the current target of 40% of all housing to be in the affordable category, would reduce the extent to which the needs of people who cannot afford market housing remain unmet and Option 4a, increase the overall proportion of affordable housing to 50% is favoured ahead of a reduction (Option 4b) or retaining the current level of 40% overall requirement for affordable housing (Option 4c). For the same reasons, a lowering of the threshold above which the provision of affordable housing is required, is taken forward as Policy HO3 (Option 5a) rather than retaining the current level of 15

units (Option 5b), and seeking contributions for housing from employment development (Option 6a) is favoured ahead of not doing so.

- 4.15 The current market preference is for the provision of smaller properties. Option 8d is taken forward such that densities will be matched to the location, but with a minimum of 35 dwellings per hectare. Option 8a, encourage higher densities, is not a specific requirement but will be sought where appropriate. The concern is not to result in a shortage of larger properties in the long term. Options 8b and 8c are also rejected since higher densities are likely to be necessary to avoid the use of greenfield sites in the long term.
- 4.16 Contributions to infrastructure will be required on a need assessment basis (Option 9b). A standard contribution from all development is not taken forward since it may adversely affect viability of proposals and may not be proportionate to the impact. Equally, no contribution (Option 9c) is rejected since this would not be likely to deliver adequate infrastructure.
- 4.17 The Economy and Employment Land Study reports that the Borough is likely to be able to maintain full employment in the long term through reuse of sites that are well located. Whilst Strategic Policy SP3 seeks to retain the best employment land it is considered, that smaller poorly located employment sites can make a significant contribution to housing land requirements (Option 3a)

Amendments made to the DPD and other sustainability considerations arising at the Preferred Options Stage (Regulation 26 Consultation)

- 4.18 The SAR commented that greater certainty with respect to achieving required densities would strengthen the DPD in terms of meeting the overall average density required by the draft SEP as well as ensuring appropriate design which delivers environmental improvements. Policy HO7 retains an approach of defining four density scenarios. It is considered that the approach is likely to deliver the required density, but monitoring would be necessary to allow assessment of the balance between high density and the provision of open space.
- 4.19 The combination of a reduced threshold for affordable housing provision and a requirement for a higher proportion of development to be affordable housing may have an adverse impact on viability. In order to secure additional affordable housing valuation advice from consultants suggests that seeking financial contributions from developments of fewer than ten houses may be appropriate, subject to individual circumstance.

Strategic Policy SP3, Economy and Employment Land Provision (supplemented by detailed policies, EM1 and EM2)

Options considered

- 4.20 The Economy and Employment Land Study reports that the Borough is likely to be able to maintain full employment in the long term through reuse of sites that are well located. Accordingly, Strategic Policy SP3 seeks to retain the best employment land (Option 3c) and permit other sites to be redeveloped for housing. The option of no further loss to housing (Option 3b) is rejected. The commercial property market is currently relatively weak compared to the housing market and there is evidence of demand to redevelop good quality employment sites for housing. Without intervention

to retain sites in employment use there is a risk that the stock of good quality well located sites will be eroded to the long term detriment of the local economy. Option 3a (uncontrolled loss of employment land) is therefore also rejected.

Amendments made to the DPD and other sustainability considerations arising at the Preferred Options Stage (Regulation 26 Consultation)

- 4.21 Initial appraisal found that the Core Strategy and Policies DPD relied on the provision of housing to address the shortage of skilled workers in the short and long term. Text has been added to Strategic Policy SP3 identifying the specific intention to support initiatives to improve skills of local workers, although it is recognised that this will be achieved by working with other agencies led by Surrey County Council. The onus will be on initiatives outside the remit of the DPD.
- 4.22 It has also become apparent that the loss of employment areas, which provide services at a neighbourhood level, may have an adverse impact on accessibility and traffic congestion. Accordingly Strategic Policy SP3, supported by SP4, has been strengthened to ensure this matter is addressed when considering development proposals.
- 4.23 Appraisal also highlighted the role which redevelopment of employment sites for mixed use could play in delivering renewable energy. The issue is now covered more fully in Strategic Policy SP7 and CC1 which refer to renewable energy and the general application of sustainable design and technologies.

Strategic Policy 4, Town Centres (supplemented by detailed policies TC1, TC2, TC3, TC4, TC5)

Options considered

- 4.24 The locational strategy established through Strategic Policy SP1 seeks to focus development in urban areas and relies heavily on retail development in Staines Town Centre. Option 10a is consequently taken forward in preference to no further growth in Staines town centre (Option 10b). The Retail Study shows there is scope to improve shopping provision further and there is land available that could be developed for shopping and related town centre uses without infringing flooding constraints. The study shows there is no market demand to expand other centres.
- 4.25 Spelthorne shoppers already have access to a range of out of centre food and non food stores. Since out of centre stores are less likely to be accessible by public transport than town centres and consequently more reliant on the car, Option C, the provision of more out of centre retailing is rejected. Option 11a, no redevelopment at Ashford, Shepperton and Sunbury Cross is also rejected in favour of a policy which allows small scale change (Option 11b). This approach supports local provision of services and is considered to potentially consolidate the role of other centres. The certainty with which this prediction is made is not high, however, and the accessibility to services in the whole Borough will be a key area for monitoring.

Amendments made to the DPD and other sustainability considerations arising at the Preferred Options Stage (Regulation 26 Consultation)

- 4.26 Detailed mapping of fluvial flooding, as provided by the Environment Agency, was used at the Regulation 26 stage and a strategy was proposed to address flooding. The

amended Strategic Policy SP1 for the submission DPD provides clearer guidance and criteria, however, since a comprehensive Strategic Flood Risk Assessment (SFRA) has been completed. The key consideration is that housing should not be located in the Flood Risk Area Zone 3a unless it can be demonstrated that the risks can be overcome. In such circumstances exceptions would need to be expressed in terms of economic and social benefits as well as other environmental benefits. The role of Staines as a second tier Sub Regional Centre is one such consideration that has led to policy expressing the need to focus on the delivery of betterment through redevelopment but for non-residential uses. Taking the strategy forward into the Allocations DPD, it is considered that on the basis of the role of the town centre meeting the exceptions test, a policy of delivery of betterment through redevelopment rather than relocation of services and other functions would be appropriate.

- 4.27 Following initial appraisal, text has been added making reference to the role of Clare Road, Stanwell and Lower Sunbury', which is considered to strengthen the protection of neighbourhood service provision, a key objective of the DPD.
- 4.28 Some respondents to the Options consultation opposed further growth and for many this is linked to concerns about traffic congestion. It will be important to ensure that further growth is linked to promotion of alternatives to reliance on the car. Understanding the role and interaction of all centres in the Borough will benefit from monitoring travel patterns and accessibility needs

Strategic Policy SP5, Community (supplemented by detailed policies CO1, CO2 and CO3)

Options considered

- 4.29 A combination of Option 9a and 9b (assessed infrastructure and service contributions for all development) is taken forward, supplemented by a modified version of Option 16b and Option 16c, whereby contributions can be used for open space provision where appropriate (Option 16b and Option 16c proposed always requiring a contribution to open space). Option 9c and Option 16d (not requiring contributions) have been rejected since this approach would not be likely to meet the need for new services, facilities or open space and may even result in a deterioration of current standards. By protecting existing facilities, Strategic Policy SP5 provides a degree of mitigation in taking forward Option 11b.

Amendments made to the DPD and other sustainability considerations arising at the Preferred Options Stage (Regulation 26 Consultation)

- 4.30 Appraisal raises the concern that the requirement for contributions may have an adverse impact on viability.
- 4.31 Strategic Policy SP5 has been strengthened through the addition of text requiring the retention or replacement of existing services and facilities that meet a local need. Monitoring should help build evidence regarding how needs arise cumulatively and where needs are greatest to support delivery of the policy objective in the long term.
- 4.32 Thames Water has commented, in response to the consultation on the Scoping Report, on the importance that development is planned and phased to consider the impact on water supplies and wastewater treatment. The specific issue relating to the water

environment is noted under SA Objective 17, but the general issue concerning infrastructure keeping pace with development is not considered to be significant in sustainability appraisal terms.

- 4.33 In their response to consultation on the scope of sustainability appraisal the Environment Agency identifies taking opportunities to deliver benefits for recreation and tourism opportunities, and meeting the provisions of EU Directives on water quality, specifically EU Freshwater Fisheries Directive & EU Urban Waste Water Treatment Directive as important.

Strategic Policy SP6, Maintaining and Improving the Environment (supplemented by detailed policies EN1 to EN 22)

Options considered

- 4.34 The options tested have been limited since the role of the strategic and detailed policies is to set out environmental criteria and parameters that cannot be effectively tested through 'options'. Strategic Policy SP6 includes elements of Option 1a (green belt protection), Option 16a and Option 16b (open space provision and protection) and Option 18 (design standards). Option 16d, no requirement to provide open space, has been rejected since it raises long term concern with respect to health and well being, social inclusion and the ability to enhance biodiversity.
- 4.35 Option 15a and option 17 propose a direct approach to identify specific areas for environmental improvement. Again, these have been rejected in preference for a more general and reactive approach. Appraisal considers, however, that a greater contribution would be made to sustainability if specific areas were targeted for landscape improvement and open space provision and that this could be addressed through the Allocations DPD.
- 4.36 The detailed policies address issues that have emerged through the appraisal of other options, such as the need to limit noise and light pollution, and measures which are required by other plans. Whilst this is true of all the Strategic Policies, it is particularly relevant for SP6 since there are more environmental policies than any other. The manner in which general policies address issues emerging is described in the following section.

Amendments made to the DPD and other sustainability considerations arising at the Preferred Options Stage (Regulation 26 Consultation)

- 4.37 The contribution of the Policy to sustainability has been enhanced by adding a reference to sustainable development. In addition, Policy CC1 (under Strategic Policy SP7) refers to the recently issued Code for Sustainable Homes, including specific reference to addressing flood risk and delivering renewable energy.
- 4.38 Given the findings of the Open Space Study and the importance of protecting biodiversity interests, it is noted that development proposals should seek to identify opportunities for delivering environmental benefits.

Strategic Policy SP7, Climate Change and Transport (supplemented by detailed policies CC1, CC2, CC3 and CC4)

Options considered

4.39 Strategic Policy SP7 is influenced by Option 12a and Option 13 (sustainable transport), and Option 14 (safeguarding the Airtrack route). Locating development on the basis of accessibility for car users, regardless of accessibility by other modes (Option 12b) is not taken forward since this is considered likely to exacerbate traffic congestion in the short and long term. Encouragement for renewable energy takes forward Option 19.

Amendments made to the DPD and other sustainability considerations arising at the Preferred Options Stage (Regulation 26 Consultation)

4.40 The SAR commented on the need for stronger policy for sustainable design. Strategic Policy SP7 and Policy CC1 now refer to the recently issued Code for Sustainable Homes, including specific reference to addressing flood risk and delivering renewable energy.

4.41 Appraisal considered that some flexibility could be necessary in requiring measures to reduce the need to travel by car to ensure the costs to any individual developer are not too onerous. Reservations are also expressed with respect to potential adverse impacts on the environment and through disruption to the functioning of Staines Town Centre from the Airtrack proposal.

Table 2. Summary of Rejected Options

Strategy	Issues
Promotion of development in the Green Belt (Option 1b)	Likely to place development at locations less conducive to sustainable transport, result in an unacceptable loss of open space outside settlements and introduce light and noise pollution where it is not currently an issue
Promotion of development in areas liable to flood (Option 2b)	The preferred strategy allows for limited exceptions where the proposal is for redevelopment in otherwise sustainable locations and a flood risk assessment demonstrates both that it would not worsen the risk of flooding and that there is a safe means of escape to locations outside the flood plain.
Not to safeguard employment land (Option 3a)	The commercial property market is currently relatively weak compared to the housing market and there is evidence of demand to redevelop good quality employment sites for housing. Without intervention to retain sites in employment use the stock of good quality well-located sites risks being eroded to the long term detriment of the local economy.
To safeguard all remaining employment land (Option 3b)	Some employment sites are relatively small and poorly located within residential areas. The loss of such sites would have little impact on the overall supply of employment floorspace, but does offer a potentially significant source of supply for new housing, together with local environmental benefits. A selective approach that allows for the loss of poorer sites is therefore preferred.

Reduce or retain the overall requirement for affordable housing (Option 4b and 4c)	Any reduction in the current target of 40% of all housing to be in the affordable category would not address the extent to which the needs of people who cannot afford market housing remain unmet.
Maintain the affordable housing threshold (Option 5b)	If current trends continue, lack of affordable housing is likely to limit opportunities for improving well being and adversely effect the economy. Lowering the threshold is preferred since it is likely to deliver more affordable housing.
Do not seek a contribution for affordable housing from commercial development (Option 6b)	If current trends continue, lack of affordable housing is likely to limit opportunities for improving well being and adversely effect the economy. The preferred policy of seeking a contribution recognises the current difficulty experienced in recruitment.
Prioritise the provision of smaller properties (Option 7a)	This is currently the market preference.
No control over housing density (8b)	In the medium to long term over provision of smaller units could result in a shortage of larger properties.
Discourage high density (8c)	Higher densities are likely to be necessary to avoid the use of greenfield sites in the long term.
No infrastructure contribution (9c)	The starting point for the DPD is to require some level of infrastructure and Option 9c would be likely to result in a deterioration of current standards.
Provide for no further growth in Staines town centre (Option 10b)	Staines is the most accessible location and the main town centre serving the Borough. The Retail Study shows there is scope to improve shopping provision further and there is land available that could be developed for shopping and related town centre uses without infringing flooding constraints. The study shows there is no market demand to expand other centres in the Borough and expanding in out of centre locations would be unacceptable in policy terms.
No loss of shops in smaller centres (Option 11a)	The favoured option for town and other centres is to allow change commensurate with the existing role.
Provide for more out of centre retailing (Option 11c)	Out of centre stores are likely to be less accessible by public transport than town centres and consequently more reliant on the car, adding to road traffic in the Borough. Promoting out of centre development would be contrary to Government guidance, which aims to focus retail development on town centres.

Locate development where it is most accessible to car users, regardless of accessibility by other modes (Option 12b)	Funds are not available for major road building and instead the Surrey Local Transport Plan seeks to encourage greater use of alternative modes of travel. If development is located where it is only accessible by car it will add to car use and add to congestion problems.
Developer contributions for environmental improvements (Option 15a)	Rejected in preference for the more general approach.
No requirement for open space (Option 16d)	Requiring no provision of open space is rejected in favour of an approach where contributions can be for open space where appropriate.
Focus efforts on improving the environment in more deprived areas of the Borough. (Option 17)	This option is not taken forward in the Core Strategy and Policies DPD, but the proposed site allocations will address some issues.

Predicted impacts of DPD Policies

Strategic Policy SP1, Location of development (and supporting policies)

- 4.42 Strategic Policy SP1 establishes a focus for new residential, employment and retail development within existing urban centres. In combination with Strategic Policy SP6 and Strategic Policy SP7 the strategy seeks to make effective use of existing urban land and protect greenfield land whilst keeping within flooding constraints. The Policy also stresses the importance of maintaining and improving the quality of the environment, although the emphasis of the strategy in this respect is defined in Strategic Policy SP6.
- 4.43 It is considered that the housing allocation of 151 units per year can be met within the context of this locational strategy from supply identified in the HLAA (Housing Land Availability Assessment). Policy HO1 expresses the intention to allocate sufficient land for housing development to meet identified needs. Specific sites will be identified in the Allocations DPD. Sites will not be identified for gypsies and travellers and for travelling show people, but Policy HO5 and Policy HO6 set out criteria for judging proposals and it is considered that the corresponding impacts will be similar to any other housing proposals.
- 4.44 A key objective of the spatial strategy will be to direct development to locations where there would be no impact on the integrity of the South West London Waterbodies Special Protection Area (SPA).
- 4.45 A Strategic Flood Risk Assessment (SFRA) has been completed since the Preferred Options DPD was published and the emphasis of Strategic Policy SP1 has been amended to stress the importance of avoiding unacceptable flood risks.
- 4.46 The technical detail of the SFRA indicates that the 1:100 flood risk area covers 20% of the Borough and the 1:1000, taking into account climate change predictions, 49%. It is considered that a hard line will be required with respect to the 1:20 'functional flood

plain' where water in more serious flood events will be faster flowing. SFRA Part 2 demonstrates that relocation of existing urban development is, however, unrealistic. Instead, measures to alleviate flooding are recommended and the approach of using redevelopment to secure betterment is proposed. Strategic Policy SP7 and the supporting DC policies consider the matter further and the Allocations DPD will use assessment of flood risk information for individual sites.

- 4.47 The Transport Statement finds that with an additional 3020 dwellings to 2026, the greatest impact on traffic would be associated with housing. Given the population projections, it is likely that the majority of homes will be small units, many of which will be extra care sheltered housing. Furthermore, it is likely that 60% of development will continue to be on small employment sites and existing residential areas. It is on this basis that the Statement predicts a potential small drop in the existing level of traffic across the Borough. The locational strategy advocated by Strategic Policy SP1 will support maximising benefits by ensuring that major traffic generating development is directed to places which are accessible by a choice of travel modes. The strategy not only supports the delivery of sustainable transport objectives, but also social inclusion and access to services and employment opportunities. Strategic Policy SP1 is supported by Strategic Policy SP7 in the aim of improving public transport and by requiring travel plans to encourage non car based travel.
- 4.48 The Air Quality Strategy Action Plan for Spelthorne identifies several locations along the M25, M3, A30 and at Heathrow where NO₂ limits are predicted to be exceeded in 2010 due to vehicle and aircraft emissions. The locational strategy supports a reduction in emissions through its impact on traffic and transport modes. Policy EN17 and Policy CC1 seek to ensure air quality improves, including a reduction in CO₂ emissions.
- 4.49 On the basis of a consideration of the issues identified from paragraph 3.8 onwards and the findings of appraisal discussed above, it is recommended that the condition of the SPA, traffic volume and patterns, air quality and flooding issues are monitored.

Strategic Policy SP2, Housing Provision (and supporting policies)

- 4.50 Strategic Policy SP2 clarifies the intention to meet the regional housing allocation for Spelthorne and to ensure that, within the overall total, the differing housing needs of all sections of the community are met, including 40% affordable housing. This strategy supports improving health, building community relationships and, combined with Strategic Policy SP1, improving accessibility and provision of services for all the community.
- 4.51 The Core Strategy and Policies DPD seeks to achieve the affordable housing target through negotiating 50% affordable housing on schemes of ten or more dwellings (Policy HO3), encouraging Registered Social Landlords (RSL) to bring forward sites above and below the threshold for 100% affordable housing, and requiring a financial contribution from employment development. The contribution to be made by the employment development sector is uncertain. It is reported in the Housing Market Assessment that since many developments to date have fallen below the threshold, a shortfall of affordable housing is possible.
- 4.52 Valuation Advice from consultants (set out in 'Provision of Affordable Housing' April 2007) suggests that seeking financial contributions from developments of fewer than ten houses may be appropriate without affecting viability. This measure, combined

with increasing the number of 'preferred partners' (RSLs) and clarifying the circumstances whereby employment development would be required to make a contribution (Policy HO3 c) should assist the delivery of higher levels of affordable housing. This uncertainty confirms this issue as a key matter for monitoring.

- 4.53 The Housing Land Availability Assessment identifies large housing sites already in the draft Allocations DPD as well as other large sites which have recently emerged. It also projects the continuing supply of small sites and conversions. The assessment concludes that the South East Plan requirement of 151 units per annum to 2026 can be met. Policy HO2 identifies contingency measures for dealing with a shortfall in housing provision during the life of the Plan should this occur, satisfying the requirements of PPS3 by identifying options for delivering housing beyond a fifteen year strategy.
- 4.54 Policy HO1 sets out how site allocations will identify sufficient land for housing development to meet identified needs. It seeks to balance this with an acceptable loss of employment land, retaining the best employment land for that use and seeking best use of previously developed land. By encouraging mixed use it specifically addresses concern that the loss of employment land to housing may be detrimental to long term economic sustainability.
- 4.55 Policy HO4 seeks to maximise the contribution to sustainability by identifying the specific needs that will be met through housing. Policy HO5 and Policy HO6 set out criteria for identifying sites for gypsies and travellers and for travelling show people. A Gypsy and Traveller Accommodation Assessment has recently been carried for North Surrey authorities the implications of which will need to be considered.
- 4.56 PPS3 and the draft SEP require at least 60% of new housing to be on previously developed land (pdl) and sets a minimum density of 30 dwellings per hectare. The overall strategy for using existing urban areas is likely to deliver the pdl target. Policy HO7 sets out expected densities in different location in the Borough. Annual monitoring of average density achieved in the Borough will help ensure the overall target is met.
- 4.57 The impact of development on social and environmental interests is considered under Strategic Policy SP6 and Strategic Policy SP7, below.

Strategic Policy SP3, Economy and Employment Land Provision (and supporting policies)

- 4.58 The Economy and Employment Land Study indicates that the position of full employment could withstand a small reduction in the number of jobs which are supported by existing commercial premises. A requirement for a more skilled and flexible workforce within this context has been identified, however. Accordingly, Strategic Policy SP3 seeks to maintain the level of employment and meet needs for land by supporting the renewal and improvement of employment floorspace and supporting initiatives to improve skills. Policy EM 1 and Policy EM2 reinforce this position, requiring retention and reuse of the best employment land for that purpose. The importance of maintaining a strong economy in the long term indicates, however, that the level of employment and availability of appropriately skilled workers is monitored.
- 4.59 Strategic Policy SP1 directs development to the most accessible locations, particularly Staines, supporting good accessibility to employment opportunities and existing and

new services for all residents. In setting out the context for delivering housing, Policy HO1 includes provision to retain the best employment land to prevent an unacceptable loss of employment land. By encouraging mixed use it specifically addresses concern that the loss of employment land to housing may be detrimental to long term economic sustainability.

- 4.60 The Transport Statement finds that with an additional 3020 dwellings to 2016, the greatest impact on traffic would be associated with housing and predicts a net drop in traffic of 20% across the Borough. The locational strategy advocated by Strategic Policy SP1 will support maximising benefits by ensuring that major traffic generating development is directed to places which are accessible by a choice of travel modes. The intensification of use at the best located employment sites is not considered likely to have an adverse impact since it would consolidate the ability to deliver the transport strategy set out in Strategic Policy SP7.
- 4.61 The SFRA Part 2 demonstrates that relocation of existing urban development is unrealistic. Again, intensification of use at the best located employment sites is considered likely to support the approach of securing betterment through redevelopment. Strategic Policy SP7 and the supporting DC policies consider the matter further and the Allocations DPD will use assessment of flood risk information for individual sites. The potential consequences of flood events, however, indicate the importance of monitoring the delivery of betterment with respect to flood risk.

Strategic Policy SP4, Town Centres (and supporting policies)

- 4.62 By directing new retail development to existing centres, Strategic Policy SP4 seeks to ensure need is met in areas that are accessible. The Policy also refers to the importance of protecting the functions of neighbourhood centres such as Clare Road, Stanwell and Lower Sunbury. In doing so, this supports social inclusion and the objective of reducing the need to travel for services in the long term. The importance of good accessibility to services for all indicates the need for monitoring.
- 4.63 Detailed policies expand on the strategy and consolidate the aims of Strategic Policy SP1 by protecting the function of Staines Town Centre as the major centre for retail and service uses (Policy TC1 and TC2); by protecting the retail and service function of specific centres, allowing for small scale redevelopment (Policy TC3), and isolated shops (Policy TC4); and setting a sequential test such that sites outside Staines and the other main centres will be preferred for retail and service development (Policy TC5). Outside these areas, policy requires clear demonstration that the location has good accessibility and allocations are within environmental constraints.
- 4.64 Maximising benefits and mitigating any adverse impacts at any individual location as well as the cumulative impact of the spatial distribution of development is a matter for Strategic Policy SP6, Strategic Policy SP7 and detailed policies. Meeting BREEAM standards for commercial buildings is an essential requirement to ensure a step change in delivering sustainable design.

Strategic Policy SP5, Community (and supporting policies)

- 4.65 Strategic Policy SP5 seeks to ensure community services are provided to meet needs. This is a key element in improving health, building community relationships and improving services for the elderly for the long term; and supports the strategy set out in Strategic Policy SP4.

- 4.66 Development Policy CO1 consolidates the overall spatial strategy by directing development to locations with good access to facilities and seeking to ensure new development delivers adequate services. Policy CO3 requires that infrastructure is put in place to support new development or that a contribution is made towards the cost of provision.
- 4.67 Policy CO2 seeks to ensure delivery of open space, a policy which will help address both poor environmental quality in and the deficiency in quantity, quality and accessibility of amenity green space across the Borough as identified in the Open Space, Sport and Recreation Study. This issue is picked up further under Strategic Policy SP6 and it is recommended that area specific development plans also seek to deliver environmental benefits.
- 4.68 The importance of good accessibility to services and open space, and for infrastructure to support the community and economy indicates the need for monitoring.

Strategic Policy SP6, Environment (and supporting policies)

- 4.69 The focus of Strategic Policy SP6 is to safeguard existing historic and natural assets and seek improvements to areas of poor quality environment, including measures to improve air quality. A requirement for new development is that it makes a positive contribution to the environment.
- 4.70 Appraisal has identified two linked issues for Spelthorne in that areas exist where landscape quality has an adverse impact on the quality of life of people living in the area and accessibility to open space is not even across the Borough. Strategic Policy SP6, part a) protects existing open space and SP6 d) requires high quality design. Whilst it is considered that this will support the objectives of promoting social inclusion and an attractive and safe environment to be key objectives; it is noted that an important objective of area specific development plans will be to seek opportunities to deliver environmental benefits including accessible open space.
- 4.71 Detailed Policies consolidate Strategic Policy SP6 and provide the framework for securing benefits and avoiding or mitigating adverse impacts by identifying environmental parameters and providing specific criteria against which to judge development proposals.
- 4.72 Detailed Policies EN1 to EN22 offer protection to a range of environmental interests as listed above. This set of policies provides a reasonable level of certainty that significant adverse impacts would not occur on the environment. However, to ensure the plan delivers these objectives, and on the basis of a consideration of the significant issues identified it is considered appropriate to monitor whether adverse impacts are prevented and whether any benefits are achieved. The specific matters to be monitored are proposed in Part III, Section 6.

Strategic Policy SP7, Climate Change and Transport (and supporting policies)

- 4.73 Strategic Policy SP7 consolidates a locational strategy that seeks to address the causes and reduce the impact of climate change through influencing the location of development to reduce the need to travel by car whilst avoiding flood risk. Sustainable resource use is promoted through requiring consideration of energy efficiency, renewable energy and waste management for any new development. Detailed policies provide further detail, with Policy CC1 requiring at least 10% of new energy

requirements by renewable sources alongside improvement in energy efficiency. Meeting the standards set in the Code for Sustainable Homes and through BREEAM is an essential requirement to ensure a step change in delivering sustainable design that will require monitoring. Equally, the level of CO₂ emissions is a significant matter that should be monitored.

- 4.74 Policy CC2, Policy CC3 and Policy CC4 set out the details for a sustainable transport strategy, consolidating Strategic Policy SP1 by requiring major traffic generating development is located where alternative modes of transport are accessible and to secure improvements through travel plans, and including a requirement to ensure transport infrastructure is capable of accommodating the travel requirements of new development safely and a restraint based policy for parking provision.

PART IIb

PREDICTED IMPACTS OF THE ALLOCATIONS DPD (Stage B)

5. Developing and refining options and assessing effects

SEA Requirement

Article 5.1 of the SEA Directive requires that an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.

Information to be provided in the Environmental Report includes an outline of the reasons for selecting the alternatives dealt with (Annex I (h))

- 5.1 Appraisal has involved predicting the likely social, environmental and economic impacts of the Allocations DPD with respect to a range of options for delivering the Plan objectives. The findings of appraisal have been taken into account by the policy making team when making decisions concerning which sites to take forward.
- 5.2 The 'options' comprise a list of sites that have each been considered in the context of the SA Framework. The full findings of this appraisal are recorded in matrices which are provided as Appendix 5. Predictions are described in terms of their magnitude, their geographical scale, the time period over which they will occur, whether they are permanent or temporary, positive or negative, probable or improbable, frequent or rare, and whether or not there are secondary, cumulative and/or synergistic effects. The focus is on likely significant impacts of the DPD.

Sites considered

- 5.3 A total of 27 sites have been considered for inclusion in the DPD. Of these 10 have been identified by private interests and the remainder have been identified by Spelthorne Borough Council. All sites have been considered against the same sustainability criteria.
1. Land south of Running Horse public house and east of Vicarage Road, Sunbury
 2. Land at the north end of Horton Road, Stanwell Moor
 3. Cricket Ground, Woodthorpe Road, Ashford
 4. Land west of Short Lane, Stanwell
 5. Notcutts, Staines Road, Laleham
 6. Land off Croysdale Avenue, Sunbury
 7. Manor Farm, Charlton
 8. Former tennis courts, Land off The Ridings, Sunbury
 9. London Irish RFC, Sunbury
 10. Ash House & Mimosa Court, Littleton Road, Ashford
 11. Former Rodd Engineering Works, Govett Avenue, Shepperton
 12. 28-44 Feltham Road, Ashford
 13. 158-166 Feltham Road, Ashford
 14. Land adjoining Feltham Hill Road and Poplar Road, Ashford
 15. Works adjoining Harrow Road, Ashford
 16. Car Park, Bridge Street

17. Land adjoining the Elmsleigh Centre
18. Council Offices Knowle Green Staines
19. Steel Works and Builders Merchants Gresham Road, Staines
20. Builders Merchants Moor Lane, Staines
21. Riverside Works Fordbridge Road, Sunbury
22. Land south of Southern Perimeter Road and east of Stanwell Moor Road, Stanwell (whole site)
23. Land south of southern Perimeter Road and east of Stanwell Moor Road, Stanwell (eastern part of site only)
24. Land south of Bedfont Road, Stanwell
25. Merit Point Hanworth Road, Sunbury (former Celotex site)
26. Land at Wheatsheaf Lane, Staines (Public Open Space)
27. Land to the west of Edward Way (Public Open Space)

Strategic Considerations

- 5.4 To facilitate the consideration of individual sites, the approach to, and position with respect to, a number of strategic issues has been established. This has involved the production of separate reports:
- Strategic Flood Risk Assessment
 - Transport Statement
 - Appropriate Assessment (Screening Opinion) for the South West London Waterbodies Special Protection Area (SPA)
 - Detailed Air Quality Assessment for Spelthorne, 26 April 2006 (CERC)
- 5.5 Detailed mapping of fluvial flooding, as provided by the Environment Agency, was used during the early stages of DPD production to assist in identifying potential flooding constraints on new development. The strategy that was proposed to address flooding has been further developed using the findings of the Strategic Flood Risk Assessment (SFRA). The key considerations are that each site allocation will need to conform with the sequential test of PPS25 if it is to be taken forward, such that sites in Zone 1 are preferred ahead of Zone 2; and that housing can not be proposed in the Flood Risk Area Zone 3b. Where conformity with the sequential test cannot be demonstrated, but exceptional circumstances exist and it can be demonstrated that the risks can be overcome, the economic and social benefits as well as other environmental benefits would need to be clearly expressed. The Environment Agency has advised in greater detail with respect to assessment of flood risk for the town centre sites, Govett Avenue and Fordbridge Road areas.
- 5.6 The Transport Statement identifies congestion as a problem and in particular that the M25 and A3116 will be operating above their design capacity in 2026. The Allocations DPD is, however, only considered likely to have a limited impact on existing travel patterns. Whilst traffic originating in the Borough or coming to the Borough can be influenced by local policies to encourage and facilitate non-car use, there would be little impact on traffic originating outside the area and not having a destination within the Borough. It is concluded that the plans will not of themselves have any adverse impact on the operation or safety of the trunk road network passing through Spelthorne when compared to the no-plan situation or cause detriment in terms of air quality.

- 5.7 The Air Quality Assessment reports that annual average NO₂ target concentrations were exceeded during 2005 along major roads, but predicts that the incidence of exceedance will reduce by 2010. The average annual average target concentrations for PM10 are, however, predicted to be exceeded for the whole of the Borough in 2010.
- 5.8 The series of plans set out in Appendix E to the Transport Statement demonstrate a relatively high level of accessibility to public transport from most of the urban areas of the Borough. The study specifically shows there will be lower trip generation rates where employment sites are redeveloped for housing and that measures can be implemented to reduce traffic associated with residential development. Sites that offer the best opportunities to consolidate these benefits are, therefore, favoured. Strategic Policy SP6, Policy CC2, Policy CC3 and Policy CC4 will play an important role in ensuring each site maximises the benefits to this objective.
- 5.9 During the early stages of the production of both the Core Strategy and Policies DPD and the Allocations DPD consideration has been given to the potential for significant impact on the integrity of an SPA or SAC. For individual sites, a note was made where an SPA lay within 3km. Published guidance¹⁵ has assisted the process of considering the need for appropriate assessment. A detailed screening opinion has been published separately.
- 5.10 The Screening Opinion concludes that there are not likely to be significant impacts on any SPA or SAC within 15km of the boundary of the Borough. Consideration of the impact on biodiversity at the regional and local level has been required for all sites.
- 5.11 Some sites have not been taken forward in the Allocations DPD on the basis that they are located in the Green Belt. The SAR considers their 'greenfield' nature to mark them as less sustainable rather than the policy principle of only allowing development in the Green Belt in exceptional circumstances. This is on the basis that there is more likely to be a loss of habitat and less likely to support sustainable transport.
- 5.12 In addition to the considerations above, the Economy and Employment Land Study has found that there is no need for new areas to be designated for employment use and that the loss of some employment sites which are not well located, based on accessibility, amenity, business needs and market demand criteria, would be sustainable.
- 5.13 For all sites survey would be required to ascertain any need for contaminated ground remediation prior to development, whether there is any archaeological interest and whether important habitats or species are present.

¹⁵ Planning for the Protection of European Sites: Appropriate Assessment - Guidance for Regional Spatial Strategies and Local Development Documents, August 2006; and Appropriate Assessment of Plans, Scott Wilson, Levett-Therivel Sustainability Consultants, Treweek Environmental Consultants and Land Use Consultants. September 2006

Sites taken forward in the Allocations DPD

Allocation A1: 28-44 Feltham Road, Ashford (P/001/H)

- 5.14 This site of 0.47ha lies in Flood Risk Area Zone 1 and is proposed for residential development of approximately 23 dwellings. It is currently occupied by workshops and yards and bounded predominantly by housing. It is not considered to be well located for employment use.
- 5.15 The site would be developed between 2011 and 2016, which allows flexibility in the timing of the development to help existing businesses to relocate. Residential development would enable the impact of commercial activity on the surrounding residential area to be reduced.
- 5.16 Schools, open space, a post office and a health centre lie within 10 minutes walking distance and public transport is available to Ashford Hospital. Whilst the site is not close to other key services, the Transport Statement predicts there is likely to be a net decrease in overall traffic movements if the site is redeveloped for housing.
- 5.17 The site lies within an Area of High Archaeological Potential. A desk top survey would be required to determine whether any further investigation was necessary prior to development.

Allocation A2: 158-166 Feltham Road, Ashford (P/002/H)

- 5.18 This site of 1.3ha lies in Flood Risk Area Zone 1 and is currently in warehousing use. A housing density of approximately 50dph is proposed and it is considered that the site could be developed for a mixture of approximately 60 flats and houses.
- 5.19 There are substantial buildings on the site at present and it is bounded on three sides by residential properties and is not considered to be a well-located employment site. Residential development would enable the impact of commercial activity on the surrounding residential area to be reduced.
- 5.20 Schools, open space, a post office and a health centre lie within 10 minutes walking distance and public transport is available to Ashford Hospital. Whilst the site is not close to other key services, the Transport Statement predicts there is likely to be a net decrease in overall traffic movements if the site is redeveloped for housing.

Allocation A3: Land Adjoining Feltham Hill Road and Poplar Road, Ashford (P/011/H)

- 5.21 This site of 1.47ha lies in Flood Risk Area Zone 1 and is in warehousing use. Almost entirely vacant, it is proposed that the site be developed for a mixture of approximately 70 flats and houses at a density of approximately 50 dwellings per hectare. The site is bounded on three sides by houses and access is through a primarily residential area and it is not considered to be a well-located for employment use. Residential development would enable the impact of commercial activity on the surrounding residential area to be reduced.
- 5.22 Accessibility to services by public transport and on foot is good and the Transport Statement predicts there is likely to be a net decrease in overall traffic movements if the site is redeveloped for housing.

[Allocation A4: Works Adjoining Harrow Road, Ashford \(P/031/H\)](#)

- 5.23 This site of 0.58ha lies in Flood Risk Area Zone 1 has a short frontage to the A30 and it is proposed that the site be developed for a residential development of approximately 36 dwellings at a density of approximately 60 dwellings per hectare. It is not considered a good location for employment development due to the proximity of housing in Harrow Road.
- 5.24 The site would be developed between 2011 and 2016, which allows flexibility in the timing of the development to help existing businesses to relocate. Residential development would enable the impact of commercial activity on the surrounding residential area to be reduced and could help improve an area with a relatively low average IMD score.
- 5.25 The site is adjacent to an SNCI and a wetland area which is relevant to the wider use of the SPA by birds. There is no public access to the latter. It is considered that assuming normal pollution control measure is implemented, there is not likely to be any mechanism for effect on the SPA. Conversely, development could facilitate the delivery of BAP targets.
- 5.26 Access to key services is reasonably good with public transport links to Ashford Hospital. Delivering a more sustainable transport strategy will, however, be a key area for consideration given the proximity to a poor air quality hot spot. The Transport Statement predicts that traffic movements would be likely to remain the same but are already very low.

[Allocation A5: Steel Works and Builders Merchants, Gresham Road, Staines \(P/028/H\)](#)

- 5.27 This site of 01.37ha lies predominantly in Flood Risk Area Zone 1, but partly in Zone 2 and adjacent to an area within Zone 3a. It is proposed that the site is developed for 100 flats at a density of just over 70 dwellings per hectare. Currently a yard occupied by steel stockholders together with a builder's merchant, redevelopment would enable the impact of commercial activity on the surrounding residential area to be reduced. The site is unlikely to be available until the second half of the plan period.
- 5.28 Access to public transport is excellent and primary and Secondary schools can be accessed on foot. The Transport Statement predicts there is likely to be a net decrease in overall traffic movements if the site is redeveloped for housing.
- 5.29 If taken forward as an allocation, conformity with the sequential test of PPS25 would need to be demonstrated and Flood Risk Assessment would be required to ascertain any need for mitigation prior to development.
- 5.30 Benefits could be delivered through the creation of new habitats to help meet BAP targets.

[Allocation A6: Rodd Estate and the Lodge, Govett Avenue, Shepperton \(P/008/H\)](#)

- 5.31 This site of 1.7ha lies within Flood Risk Area Zone 2 and Zone 3a and is currently occupied by vacant industrial units. It is proposed that the site be developed for approximately 85 dwellings at a density of 51 dwellings per hectare.

- 5.32 Close to Shepperton town centre and railway station, the site enjoys good bus and rail links. The Transport Statement predicts there is likely to be a net decrease in overall traffic movements if the site is redeveloped for housing. In addition, development for residential use could improve the amenity of the area and deliver open space.
- 5.33 Given the level of flood risk in the area, if taken forward as an allocation, conformity with the exceptions test of PPS25 on the basis of the contribution to role of Shepperton Town Centre. A Flood Risk Assessment would be required to identify appropriate mitigation prior to development and whether betterment can be delivered.

[Allocation A7: Builders Merchant, Moor Lane, Staines \(P/005/H\)](#)

- 5.34 This 0.57ha site lies in Flood Risk Area Zone 2 and adjacent to an area in Zone 3b. It is proposed for approximately 30 dwellings and forms the remaining part of an existing housing proposal in the Local Plan. It lies within a residential area and is not considered to be a well located for employment use. It is unlikely to become available in the short term.
- 5.35 Residential development would enable the impact of commercial activity on the surrounding residential area to be reduced and new habitats could be created to help meet BAP targets. The Transport Statement predicts there is likely to be a net decrease in overall traffic movements if the site is redeveloped for housing.
- 5.36 If taken forward as an allocation, conformity with the sequential test of PPS25 would need to be demonstrated and Flood Risk Assessment would be required to ascertain any need for mitigation prior to development and whether betterment is appropriate given the proximity to Zone 3b.

[Allocation A8: Riverside Works, Fordbridge Road, Sunbury \(P/026/H\)](#)

- 5.37 This 1.57ha site fronts the River Thames. It lies in Flood Risk Area Zone 2 and adjacent to an area in Zone 3b and is currently used for a mix of offices and car parking. A development of approximately 50 dwellings is proposed at a density close to the minimum of 35 dwellings per hectare.
- 5.38 The site enjoys reasonable access to public transport although key services are not easily accessible on foot. The Transport Statement predicts there is likely to be a net decrease in overall traffic movements if the site is redeveloped for housing compared with the potential movements associated with the existing commercial use.
- 5.39 Residential development would be more in keeping with the location and provides the opportunity to improve the setting of the River Thames. New wildlife habitats could be created to help meet BAP targets
- 5.40 If taken forward as an allocation, conformity with the sequential test of PPS25 would need to be demonstrated and a Flood Risk Assessment would be required to ascertain any need for mitigation prior to development and whether betterment is appropriate given the proximity to Zone 3b.

Allocation A9: Bridge Street Car Park, Staines (P/004/H)

- 5.41 This 0.71ha site lies within Flood Risk Area Zone 3a. It is proposed to develop approximately 75 dwellings, including retention of an element of public car parking beneath.
- 5.42 Access to the Town Centre and public transport is possible on foot and cycle and the Transport Statement predicts there is likely to be a net decrease in overall traffic movements if the site is redeveloped for housing.
- 5.43 Redevelopment would provide an opportunity to create a high quality development that makes the most of this visually important site, offering the potential to enhance both the town centre and the setting of the River Thames.
- 5.44 Given the level of flood risk in the area, if taken forward as an allocation, conformity with the exceptions test of PPS25 on the basis of the contribution to role of Staines Town Centre. A Flood Risk Assessment would be required to identify appropriate mitigation prior to development and whether betterment can be delivered.

Allocation A10: The Elmsleigh Centre and adjoining land, Staines (P/030/H)

- 5.45 Retail and residential development is proposed to take place at the western and southern parts of this site in an area totalling of 6.62ha. Phase 3 is programmed for 2008 to 11 and comprises redevelopment and extension to the Elmsleigh Centre to provide approximately 2,500 sq m of retail floorspace, at least 30 flats and improvements to the bus station; and Phase 4 is programmed for 2011 to 14, entailing an extension of the Elmsleigh Centre to the west to provide a comprehensive development including at least 18,000 sq m of retail floorspace, a mix of related non retail uses, approximately 65 flats, additional parking and revised access and servicing arrangements.
- 5.46 The site lies in a highly accessible location. The Elmsleigh Centre is by far the biggest proposal, but, because a large part of it is a retail use, which is not open to shoppers in the am peak, trips are relatively low at 109 movements. Of the 109 movements 49 would arise anyway on the wider highway network, as retail provision would otherwise be made elsewhere.
- 5.47 The 2004 Spelthorne Retail Study shows there is scope for further retail development in Staines to meet forecast growth in retail expenditure on non-food items and the scale of the allocation is consistent with the findings of the study.
- 5.48 Given the level of flood risk in the area, if taken forward as an allocation, conformity with the exceptions test of PPS25 on the basis of the contribution to role of Shepperton Town Centre. A Flood Risk Assessment would be required to identify appropriate mitigation prior to development and whether betterment can be delivered.

Allocation A11: Land to the West of Edward Way, Ashford (P/019/O)

- 5.49 This site of 1ha is in the Green Belt and fronts the A30 with residential development along the eastern boundary. The proposal is to create public open space with possible children's play area. The scheme will provide open space for residential areas within north Ashford with inadequate provision at present.

5.50 The proposal would maintain and provide an opportunity to enhance the biodiversity of the site.

Sites not allocated

5.51 All sites have been considered against all SA Objectives and the findings are detailed in Appendix 5. The Table below summarises the issues which relate to why the following sites are not recommended for inclusion as allocations in the DPD in terms of the predicted impacts on sustainability.

Table 3 Sites not Allocated

Site	Issues
Vicarage Road, Sunbury (P/016/H)	Whilst the site is in Flood Risk Area Zone 1, it is a greenfield site (Green Belt) with relatively poor access to services. Part of the site is former landfill for inert waste.
Horton Road, Stanwell Moor (P/012/H)	The site is not close to key services and lies within an air quality management area (AQMA) due to exceedance of the NO ₂ target level. It is also within the airport LEQ 72 contour and the Flood Risk Area Zone 2.
Woodthorpe Road, Ashford (P/007/H)	Whilst there would be reasonably good access to services, it is a greenfield site (Green Belt) within Flood Risk Area Zone 2.
Short Lane, Stanwell (P/020/H)	Whilst there would be reasonably good access to services, it is a greenfield site (Green Belt) and close to area identified as exceeding the NO ₂ target level in 2005 and is predicted to remain so in 2010. There is High Archaeological Potential on the site and a detailed investigation and assessment are likely to be necessary.
Staines Road, Laleham (P/025/H)	Whilst there would be reasonably good access to services, it is a greenfield site (Green Belt) and within Flood Risk Area Zone 2. An employment use would also be displaced.
Croysdale Avenue, Sunbury (P/014/H)	Whilst there would be reasonably good access to services, it is a greenfield site (Green Belt).
Manor Farm, Charlton (P/023/H)	Whilst the site is in Flood Risk Area Zone 1, it is a greenfield site (Green Belt) with relatively poor access to services. Employment use would be displaced.
The Ridings, Sunbury (P/009/H)	Whilst part of the site is previously developed land, the proposal would involve the loss of open space. In addition, the site is near an area identified as exceeding the NO ₂ target level in 2005 and is predicted to remain so in 2010.

London Irish RFC, Sunbury (P/021/H)	Whilst part of the site is previously developed land, the proposal would involve the loss of open space. In addition, the site is near an area identified as exceeding the NO ₂ target level in 2005 and is predicted to remain so in 2010.
Littleton Road, Ashford (P/003/H)	The site is relatively poorly located for access to key services and residents lies near hot spot exceeding the NO ₂ target level in 2005 and is predicted to remain so in 2010. An employment use would be displaced.
Knowle Green, Staines (P/006/H)	The site will not become available during the Plan period.
Stanwell Moor Road, Stanwell (whole site) (P/017/C)	The site is not previously developed land and lies close to an area identified as exceeding the NO ₂ target level in 2005 and is predicted to remain so in 2010. It is adjacent to the Staines Moor SSSI and SPA and is partly designated as an SNCI. Stanwell Place grounds have been identified as possibly of local interest.
Stanwell Moor Road, Stanwell (eastern part of site only) (P/018/C)	The site is not previously developed land and lies close to an area identified as exceeding the NO ₂ target level in 2005 and is predicted to remain so in 2010. It is adjacent to the Staines Moor SSSI and SPA and is partly designated as an SNCI. Stanwell Place grounds have been identified as possibly of local interest.
Bedfont Road, Stanwell (P/015/C)	Loss of greenfield land and close to area identified as exceeding the NO ₂ target level in 2005 and is predicted to remain so in 2010. Noise may require mitigation measures.
Merit Point, Hanworth Road, Sunbury (P/024/M)	Whilst previously developed land, accesses to key services is relatively poor and concern exists regarding traffic generation. The site is adjacent to an area identified as exceeding the NO ₂ target level in 2005 and is predicted to remain so in 2010.
Wheatsheaf Lane, Staines (P/013/O)	Strong local objections to the proposal during consultation process
Safeguarding for the Airtrack corridor (P/027/T)	Sufficient level of safeguarding proposed in Core Strategy and Policies DPD

Part III
MONITORING (Stage E)

6. Recommendations for monitoring the significant effects of implementing the DPDs

Monitoring and responding to adverse effects

SEA Requirement

Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, *inter alia*, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action (Article 10.1)

The Environmental Report shall include a description of the measures envisaged concerning monitoring (Annex I (i))

- 6.1 The aim of monitoring will be to ensure information is provided which can be used to highlight significant effects and specific performance issues, leading to more informed decision-making on future plans. Monitoring will also consider whether new or better information is available to fill gaps in data and provide a link to project level EIA.
- 6.2 An implementation and Monitoring Framework is proposed in the Core Strategy and Policies DPD and will involve quantifying, as often as necessary, both beneficial and adverse significant sustainability effects of implementing the plan and seek to identify impacts which differ from those which were predicted, or were unforeseen due to changes of circumstances. This will enable the Council to identify, on an annual basis, whether any impacts are occurring which require remedial action.
- 6.3 In addition to the issues identified in the Core Strategy and Policies DPD it is recommended that the following issues are monitored or, where data is not available, that the Council seeks to develop a means to improve monitoring:
 - In conjunction with Natural England, the Condition of the SPA
 - Availability of appropriately skilled workers
 - Meeting BREEAM standards
 - Meeting the standards in the Code for Sustainable Homes
 - CO₂ emissions
 - Whether areas exist with low IMD scores
 - Meeting BAP targets
- 6.4 The findings of the appraisal of individual sites would provide a good basis for screening the need for environmental impact assessment. Where EIA is deemed necessary, the same information could be used to scope the content of an Environmental Statement.

Part IV

Technical and procedural information

7. Technical and procedural information

Consultation documents

The documents referred to below are available at: www.spelthorne.gov.uk

- Scoping Report (March to April 2005)
- DPD Sustainability Appraisal Progress Report (September to October 2005)
- Sustainability Appraisal Report for Preferred Options (May to June 2006)
- Sustainability Appraisal Report for Submission DPD (this document)
- Consultation Responses
- Consultation Statement
- List of consultees

Screening of DPDs that have no significant effects

It is considered that all the Core Strategy and Policies DPD is likely to have significant impacts on the Environment (either positive or negative). The Sustainability Appraisal Report incorporates an Environmental Assessment under the Environmental Assessment of Plans and Programmes Regulations 2004.

Screening for the need for Appropriate Assessment

Separate report.

SEA Regulations

To meet the requirements of the SEA Regulations and Directive (Environmental Assessment under the Environmental Assessment of Plans and Programmes Regulations 2004.), the SAR should address all the issues listed below.

The relationship of the plan or programme with other relevant plans and programmes (Annex I(a) SEA Directive)	Section 3 and Appendix 6
The environmental protection objectives, established at international, European Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation (Annex I (e) SEA Directive)	The consideration of the requirements of other plans and programmes and consultation has ensured these issues are incorporated into the SA Framework where appropriate.
Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme and the environmental characteristics of the areas likely to be significantly affected (Annex I (b) SEA Directive)	Section 3 and Appendix 7
Any existing environmental problems which are relevant to the plan or programme including	Section 3
Articles 5.4 and 6.3 of the SEA Directive require that the authorities which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report (Article 6(2) SEA Directive).	General comments throughout SAR and Appendix 8 and Separate Report on Consultation, April 2007

<p>The opinions expressed in responses to consultation and the results of any transboundary consultations shall be taken into account during the preparation of the plan or programme and before its adoption (Article 8 SEA Directive)</p>	<p style="text-align: center;">General comments throughout SAR and Appendix 8 and separate Report on Consultation, April 2007</p>
<p>Article 9 (1) of the SEA Directive requires the public are informed and the plan made available when adopted, together with a consultation statement explaining the reasons for options chosen.</p>	
<p>Article 5.1 of the SEA Directive requires that an environmental report shall be prepared in which the following are identified, described and evaluated:</p> <ul style="list-style-type: none"> ▪ the likely significant effects on the environment of implementing the plan or programme ▪ reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme 	<p style="text-align: center;">Section 4 and Section 5 and Appendices 1 to 5</p>
<p>Information to be provided in the Environmental Report includes an outline of the reasons for selecting the alternatives dealt with (Annex I (h) SEA Directive)</p>	
<p>The Environmental Report shall include a description of the measures envisaged concerning monitoring the significant environmental effects of the implementation of plans and programmes in order, <i>inter alia</i>, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action (Annex I (i) SEA Directive and Article 10.1 SEA Directive)</p>	<p style="text-align: center;">Section 6</p>
<p style="text-align: center;">A paper copy of all or some of the documents referred to above can be requested by contacting the Council.</p>	

SA Guidance

The following checklist identifies where the details of the completion of each of the tasks recommended in the SA Guidance can be found.

Stage A: Setting context and objectives, establishing the baseline and deciding on the scope

A1 Identifying relevant policies, plans and programmes, and sustainable development objectives	Section 3 and Appendix 6
A2 Collecting baseline information	Section 3, Appendix 7 and individual background reports: Transport Statement, Appropriate Assessment, Strategic Flood Risk Assessment and Economy and Employment Land Study
A3 Identifying sustainability issues and problems	Section 3
A4 Developing the SA framework	Section 3
A5 Consulting on the scope of the SA	General comments in SAR, Appendix 8 and separate Report on Consultation, April 2007

Commentary

Characteristics of areas likely to be significantly affected are described including, where practicable, areas wider than the physical boundary of the plan area where it is likely to be affected by the plan. Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained. Difficulties such as deficiencies in information or methods are explained. Technical, procedural and other difficulties encountered are discussed; and assumptions and uncertainties are made explicit.

Stage B: Developing and refining options and assessing effects

B1 Testing the DPD objectives against the SA framework	Section 4, Section 5 & Appendix 2
B2 Developing the DPD options	Section 4, Section 5 & Appendix 3
B3 Predicting the effects of the DPD	Section 4, Section 5 & Appendices 4 and 5
B4 Evaluating the effects the DPD	Section 4, Section 5 & Appendices 4 and 5
B5 Considering ways of mitigating adverse effects and maximising beneficial effects	Section 4, Section 5 & Appendices 4 and 5
B6 Proposing measures to monitor the significant effects of implementing the DPD	Section 6

Commentary

Realistic alternatives are considered for key issues, and the reasons for choosing them are documented. Alternatives include 'do nothing' and/or 'business as usual' scenarios wherever relevant.

Likely significant social, environmental and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant. Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed. Likely secondary, cumulative and synergistic effects are identified where practicable. Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds.

Stage C: The Sustainability Appraisal Report

Is the purpose and objectives of the Plan clear?	Section 1
Are SA objectives clearly set out and linked to indicators and targets where appropriate?	Section 3 and Appendix 7
Is the SAR clear and concise in its layout and presentation?	Yes
Does the SAR use simple, clear language and avoids or explains technical terms?	Yes
Does the SAR use maps and other illustrations where appropriate?	Maps and illustrations in DPD
Does the SAR explain the methodology used?	Yes
Does the SAR explain who was consulted and what methods of consultation were used?	Yes
Does the SAR identify sources of information, including expert judgement and matters of opinion?	Yes
Does the SAR include a non-technical summary?	Yes

Stage D: Consulting on DPD and Sustainability Appraisal Report

D1 Public participation on the SA Report and the Preferred Options	Appendix 8 and separate Report on Consultation, April 2007
D2 Assessing significant changes	Section 4 and Section 5
D3 Making decisions and providing information	Section 4 and Section 5

Independent Examination

The DPDs and SARs submitted to the Secretary of State will be the subject of an Independent Examination. Any issues arising with respect to sustainability appraisal will be reported and this will include an agreed monitoring schedule.

Stage E: Monitoring the significant effects of implementing the DPD

E1 Finalising aims and methods for monitoring	Section 7
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E2 Responding to adverse effects	Section 4, Section 5, Section 6 and Section 7
<p><u>Commentary</u></p> <p>Monitoring will be reported annually where appropriate and this will contribute to facilitating that any unforeseen significant adverse impacts can be addressed.</p>	