

Bracknell Forest Council

Draft Sustainability Appraisal (SA)

(Incorporating Strategic Environmental Assessment)

of the

Draft Bracknell Forest Local Plan

Appendix 6 – SA of Development Management Policies

January 2018

Bracknell Forest Council

www.bracknell-forest.gov.uk

This appendix sets out the SA of Development Management policies. The SA Objectives were used as the basis of the appraisal. The following symbols show the compatibility with the SA Objectives:

✓ Positive
✓ × Positive / negative
× Negative
0 Neutral
? Uncertain

LP10 Presumption in Favour of Sustainable Development

The Presumption in Favour of Sustainable Development policy sets out the presumption in line with paragraph 14 of the NPPF.

Alternatives considered (identified within I&O and consulted on):

1. No sustainable development principles. Each policy in the BFLP would be based upon national policy not specific borough conditions.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>×</p> <p>In the event of a 'no policy' position, applications will be granted unless 'Any adverse impacts of granting permission could significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'. In this event, greenhouse gas emissions are unlikely to be considered to 'outweigh the benefits' of development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>The policy is consistent with the NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather	<p>✓ ×</p> <p>In the event of a 'no policy' position, the</p>	<p>✓ ×</p> <p>The policy is consistent with the</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>presumption does not apply where there is a risk of flooding. This is positive for sites directly affected, however may not lead to appropriate land management to reduce flood risk elsewhere.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓ x</p> <p>In the event of a 'no policy' position, the presumption does not apply to SACs, SPAs, or SSSIs. This is positive for such sites; however other locations may not demonstrate 'Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The policy is consistent with the NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓ x</p> <p>In the event of a 'no policy' position, the presumption does not apply to designated heritage assets. This is positive for such sites; however other locations may not demonstrate 'Any adverse impacts of granting permission would significantly and</p>	<p>✓ x</p> <p>The policy is consistent with the NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Term: Short, medium and long term</p>	
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	<p>x</p> <p>In the event of a 'no policy' position, applications will be granted unless 'Any adverse impacts of granting permission could significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'. In this event, pollution may not be considered to 'outweigh the benefits' of development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The policy is consistent with the NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	<p>x</p> <p>In the event of a 'no policy' position, applications will be granted unless 'Any adverse impacts of granting permission</p>	<p>x</p> <p>The policy is consistent with the NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>could significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'. In this event, resource use is unlikely to be considered to 'outweigh the benefits' of development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	<p>x</p> <p>In the event of a 'no policy' position, applications will be granted unless 'Any adverse impacts of granting permission could significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'. In this event, energy is unlikely to be considered to 'outweigh the benefits' of development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The policy is consistent with the NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of	<p>✓</p> <p>The presumption is likely to favour economic development (that may otherwise not be found suitable).</p> <p>Likelihood of effect: Likely</p>	<p>✓</p> <p>The policy is consistent with the NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	the area.	Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	Temporary/permanent: Permanent Term: Short, medium and long term	
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	✓ The presumption is likely to favour housing development (that may otherwise not be found suitable). Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	✓ The policy is consistent with the NPPF, hence similar effect. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
12	To protect and enhance human health and wellbeing	✓ x In the event of a 'no policy' position, applications will be granted unless 'Any adverse impacts of granting permission could significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'. Whilst development with direct effect on human health is unlikely to be granted, measures that promote a healthy lifestyle are unlikely to be given as much weight in	✓ x The policy is consistent with the NPPF, hence similar effect. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>decision making.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>		
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>x</p> <p>In the event of a 'no policy' position, applications will be granted unless 'Any adverse impacts of granting permission could significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'. In this event, creating and sustaining vibrant communities may not be considered to 'outweigh the benefits' of development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The policy is consistent with the NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
16	To provide accessible essential services, facilities and infrastructure.	<p>✓ x</p> <p>In the event of a 'no policy' position, applications will be granted unless 'Any adverse impacts of granting permission could significantly and demonstrably</p>	<p>✓ x</p> <p>The policy is consistent with the NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'. Access to services, facilities and infrastructure may not be considered to 'outweigh the benefits' of development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓ x</p> <p>In the event of a 'no policy' position, applications will be granted unless 'Any adverse impacts of granting permission could significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole'. Travel choice, accessibility and reducing the need to travel may not be considered to 'outweigh the benefits' of development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The policy is consistent with the NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development	<p>✓ x</p> <p>In the event of a 'no policy' position, applications will be granted unless 'Any adverse impacts of granting permission could significantly and demonstrably outweigh the benefits, when assessed</p>	<p>✓ x</p> <p>The policy is consistent with the NPPF, hence similar effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	needs.	<p>against the policies in the National Planning Policy Framework taken as a whole'. Sustainable land use, design and layout may not be considered to 'outweigh the benefits' of development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Temporary/permanent: Permanent Term: Short, medium and long term</p>	

Summary:

The Presumption in Favour of Sustainable Development reflects the NPPF and is required to be included within the plan. The policy has particular effect in the event of a 'no policy' position (e.g. if housing need is deemed not be met in the short term). This strand of national policy results in less certain, potentially negative, effects locally. The supporting text for the policy states that 'The economic, environmental and social benefits for Bracknell Forest will be maximised taking into account the principles set out in Policy LP1 and the more detailed policies and guidance which amplify them including any related Supplementary Planning Documents and other material evidence'. This mitigates the effect of national policy as far as is considered possible.

LP11 Protection of Countryside

During the drafting of this policy, it has moved from being of a strategic nature, through to a development management focus.

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓</p> <p>Likely secondary positive effect through protection of the countryside.</p> <p>Likelihood of effect: Likely</p> <p>Spatial scale: Countryside and adjoining areas</p> <p>Temporary/permanent: Permanent</p> <p>Term: Short, medium and long term</p>	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓</p> <p>The policy will protect areas of countryside for their intrinsic character and beauty. Development proposals will be permitted in certain circumstances only (e.g. large scale housing development is not permitted outside of the Local Plan allocation process where settlement boundaries area reviewed</p>	<p>✓ x</p> <p>Whist the NPPF requires the intrinsic character and beauty of the countryside to be protected, development management guidance is not provided to guide proposals in the countryside.</p> <p>Likelihood of effect: Likely</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>and redefined to provide strong and defensible boundaries).</p> <p>Enhancement is not mentioned, however this is covered in the Landscape Character and Strategic Gaps policy.</p> <p>Likelihood of effect: Likely Spatial scale: Countryside and adjoining areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Spatial scale: Countryside and adjoining areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	<p>✓</p> <p>Potential positive effect by preventing of light pollution through protection of the countryside.</p> <p>Likelihood of effect: Likely Spatial scale: Countryside and adjoining areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	support the delivery of renewable and low carbon energy			
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓</p> <p>The policy will support agriculture, forestry and other rural established businesses.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Where a genuine business need exists, the policy follows national policy. The proposed policy provides more detail about what is permitted.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	<p>✓</p> <p>The policy will support agriculture, forestry and other rural established businesses.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The policy expands on the national policy in relation to settlement boundaries, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>Whilst the policy limits development within the countryside for the majority of people, it also supports local housing need for rural workers. However the Local Plan process has allocated sufficient land to meet</p>	<p>✓ x</p> <p>The policy expands on the national policy in relation to settlement boundaries, identifying how it is to be applied locally.</p>	<p>✓</p> <p>Response: The Local Plan has allocated sufficient land to meet development needs. This policy seeks to protect areas of countryside from</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>development needs.</p> <p><u>Recommendation:</u></p> <p>Ensure that the policy is not overly restrictive in preventing new development.</p> <p>Likelihood of effect: Likely Spatial scale: Countryside Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Likelihood of effect: Likely Spatial scale: Countryside Temporary/permanent: Permanent Term: Short, medium and long term</p>	inappropriate development for their own sake.
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policy supports the maintenance of defined settlement boundaries which will protect open areas, in turn which can benefit human health.</p> <p>Likelihood of effect: Likely Spatial scale: Countryside and adjoining area Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The policy expands on the national policy in relation to settlement boundaries, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Countryside and adjoining areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>✓</p> <p>The policy will help to maintain individual settlements, and keep their distinctive</p>	<p>✓ x</p> <p>The policy expands on the national policy in relation to settlement boundaries, identifying</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>characteristics.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>The policy protects the countryside from development unless it meets specific requirements. This will keep development mainly focussed in new and existing settlement areas where supporting infrastructure is typically available.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The policy expands on the national policy in relation to settlement boundaries, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The restriction of development outside defined settlement boundaries focusses development to other areas where travel choice and accessibility is typically greater.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The policy expands on the national policy in relation to settlement boundaries, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
			term	
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>The restriction of development outside defined settlement boundaries focusses development to other areas, improving the efficiency in land use, including the use of previously developed land. The policy provides further local detail as to the replacement of buildings and re-use of buildings.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The policy expands on the national policy in relation to settlement boundaries, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

Summary:

The policy expands on the national policy in relation to the protection of settlement boundaries, identifying how it is to be applied locally. As such, the effect of the alternative 'no policy' approach would be more potentially negative. The policy seeks to protect defined settlement boundaries which will protect the areas of green space in the Borough, whilst maintaining development in areas where supporting infrastructure is already provided or can be provided. It should be noted that this policy may restrict delivery of housing in the Borough, however the Local Plan process has allocated sufficient land to meet development needs.

LP12 Landscape Character and Strategic Gaps

Alternatives considered (identified within I&O and consulted on):

2. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓</p> <p>Likely secondary positive effect through protection of the countryside.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓ x</p> <p>The policy applies to land in both the countryside and the Green Belt. It requires development proposals to protect and enhance the intrinsic value and quality of the landscape character area within which it is situated, including the setting of settlements.</p> <p>Within strategic gaps, whilst development is not wholly prevented, it is limited to</p>	<p>x</p> <p>The NPPF requires the protection and enhancement of valued landscapes, which is more limited in scope. No protection is offered for strategic gaps.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent</p>	<p>✓</p> <p>Planning response:</p> <p>1. Agreed, policy scope extended: <i>'The policy also applies to the settlement where conspicuous from these countryside or Green Belt areas where proposals may harm countryside or Green Belt</i></p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>maintain the gap function and an acceptable physical and visual separation of settlements, including with those outside the borough.</p> <p>Comments:</p> <ol style="list-style-type: none"> 1. Introductory text limits the application of this policy to the countryside and Green Belt only. This offers no policy requirements for the effect of developments within the settlement on the surrounding landscape character. This may apply particularly to developments within settlements that that are: edge of settlement developments; for very tall buildings that could potentially have a visual effect across a broad area; and to elevated sites. 2. Clause (iv) add in '<u>prevent, reduce and</u>' 3. Within the supporting text, add in a requirement to consider the cumulative effect of developments within strategic gaps: 'Development proposals in strategic gaps should demonstrate how the Landscape Character Assessment has been taken into consideration and that valued landscape functions relating to the separation of settlements will not be compromised, <u>including on a cumulative basis.</u>' 4. Would it be appropriate to add in a further paragraph on how 	<p>Term: Short, medium and long term</p>	<p><i>landscape character. This may be proposals at the edge of settlements, elevated sites, tall buildings for example</i> .</p> <ol style="list-style-type: none"> 2. Suggested text added. 3. Suggested text added. 4. Given we don't have any submitted neighbourhood plans with local gaps, at this stage we do not need to add any text. Further, if NPs do add these, they would need to be in conformity with the local plan and clearly defined/ explained in order to meet the basic conditions; and the NP would form part of the development plan once made.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>landscape gaps identified within Neighbourhood Plans will be taken into account? Is it appropriate to do this if Neighbourhood Plans could effectively identify them anywhere over the plan period?</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>		
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and	<p>✓ x</p> <p>Protection and enhancement of landscape character and strategic gaps has the</p>	<p>✓ x</p> <p>Where a genuine business need exists, the policy follows national</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>potential to conflict with economic growth, regeneration and economy. These details are covered in more detail in other policy areas.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>policy. The proposed policy provides more detail about what is permitted.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	<p>✓ x</p> <p>Protection and enhancement of landscape character and strategic gaps has the potential to conflict with education.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The policy expands on the national policy in relation to landscape character and strategic gaps, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>The policy controls development in relation to the landscape character and strategic gaps. This may restrict the delivery of new housing, however offers the potential to maintain the quality of the areas surrounding existing and new housing.</p> <p><u>Recommendation:</u> Ensure that the policy is not overly</p>	<p>✓ x</p> <p>The policy expands on the national policy in relation to landscape character and strategic gaps, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent</p>	<p>✓</p> <p>Response: The Local Plan has allocated sufficient land to meet development needs. This policy seeks to protect the identity of settlements and to ensure that any development is appropriate to the character of the landscape.</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		restrictive in preventing new development. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	Term: Short, medium and long term	
12	To protect and enhance human health and wellbeing	✓ The policy supports the maintenance of defined settlement boundaries which will protect open areas, in turn which can benefit human health. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✓ x The national policy offers less protection to open areas, which can benefit human health. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	✓ The strategic gaps will help to maintain individual settlements, and keep their distinctive characteristics. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent	✓ x The national policy offers less protection to the maintenance of individual settlements and their distinctive characteristics. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent:	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Term: Short, medium and long term	Permanent Term: Short, medium and long term	
16	To provide accessible essential services, facilities and infrastructure.	✓ The policy controls development in relation to the landscape character and strategic gaps. This will help to keep development mainly focussed in new and existing settlement areas where supporting infrastructure is typically available. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✓ x The policy expands on the national policy in relation to landscape character and strategic gaps, identifying how it is to be applied locally. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	✓ The policy controls development in relation to the landscape character and strategic gaps. This will help to keep development mainly focussed in new and existing settlement areas where travel choice and accessibility is typically greater. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✓ x The policy expands on the national policy in relation to landscape character and strategic gaps, identifying how it is to be applied locally. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
18	To encourage sustainable development by improving	✓	✓ x	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	<p>efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.</p>	<p>The policy controls development in relation to the landscape character and strategic gaps. This will help to keep development mainly focussed in new and existing settlement areas, improving the efficiency in land use, including the use of previously developed land.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>The policy expands on the national policy in relation to landscape character and strategic gaps, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	

Summary:

The policy expands on the national policy in relation to the protection and enhancement of landscape character, including the setting of settlements. It introduces strategic gaps and supports development within them only where it would not adversely affect the gap's function and not unacceptably reduce the separation of settlements. This protection would not exist if national policy was relied on. It should be noted that this policy may restrict delivery of housing in the Borough, however the Local Plan process has allocated sufficient land to meet development needs.

LP13 Rural Workers Dwellings and LP14 Occupancy Conditions

Alternatives considered (identified within I&O and consulted on):

3. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policies support the protection of rural areas, providing the opportunity for local food production and reduced food miles.</p> <p>Likelihood of effect: Possible Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>National policy also supports the protection of rural areas, providing the opportunity for local food production and reduced food miles.</p> <p>Likelihood of effect: Possible Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The policies support the protection of rural areas as undeveloped land, aiding adaptation to climate change by providing a cooling effect to urban areas, flood protection and water catchment (through natural landscapes absorbing water) and carbon storage (by plants and soils).</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, with a negative effect.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
3	To conserve and enhance the diversity of wildlife, habitats	<p>✓</p> <p>The policies limit development in rural areas,</p>	<p>×</p> <p>The policy expands on the national</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	and geology	indirectly preventing the loss of wildlife, habitats and geological features. Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term	policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, with a negative effect. Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term	
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	✓ The policies limit development in rural areas, thus protecting the characteristic landscape of the Borough. Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term	x The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, with a negative effect. Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓</p> <p>The policies support genuine rural businesses which can demonstrate accommodation needs on-site or in the immediate vicinity.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Where a genuine business need exists, the policy follows national policy; as such there would be no change in effect.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	sustainable growth of the local economy.			
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>Whilst the policies limit development within rural areas for the majority of people, it also supports local housing need for rural workers and the Local Plan process has allocated sufficient land to meet development needs.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, increasing the supply of housing.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policies support the maintenance of rural areas as open areas, offering the potential for tranquillity, recreation etc which can enhance human health and wellbeing.</p> <p>Likelihood of effect: Possible Spatial scale: Rural areas and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, with a negative effect to the wider population.</p> <p>Likelihood of effect: Possible Spatial scale: Rural areas and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
			term	
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	0	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>The limitation of development in rural areas focusses development to other areas where essential services, facilities and infrastructure is typically provided.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made. Given these would be likely to be small in scale, they are unlikely to be accompanied by improvements to services, facilities and infrastructure – a negative effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten	<p>✓</p> <p>The limitation of development in rural areas focusses development to other areas where travel choice and</p>	<p>×</p> <p>The policy expands on the national policy in relation to rural workers,</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	the length and duration of journeys	<p>accessibility is typically greater.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made. Given these would be likely to be small in scale, they are unlikely to be accompanied by improvements to travel choice and accessibility – a negative effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>The limitation of development in rural areas focusses development to other areas, improving the efficiency in land use, including the use of previously developed land. The policy provides further local detail as to the replacement of buildings and re-use of buildings.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p> <p>Suggested amendments:</p> <ol style="list-style-type: none"> 1. Clarify where the policy applies (countryside, Green Belt). 2. Clarify/define terms used in document e.g. rural workers, agricultural, forestry, equestrian, horticultural are used 	<p>×</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, with a negative effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Policy amended:</p> <ol style="list-style-type: none"> 1. Completed. 2. The term 'rural worker' is used consistently throughout 3. 'recently' has now been defined in the supporting text. 4. Policy now states that evidence required for criteria (i) to (vii)

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		interchangeably. 3. Consider defining 'recently' disposed of within the supporting text. 4. Clarify which tests evidence are required for.		

Summary:

The policies expand on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made. As such, the effect of the alternative 'no policy' approach would be more potentially negative. The policies offers strong positive effects in relation to climate adaptation, wildlife and habitats, landscape, economy and employment, human health and wellbeing, accessible services, travel choice and land use. In line with national policy, these significant benefits are to the detriment of the ability to meet housing need; however the Local Plan process has allocated sufficient land to meet development needs.

LP14 Occupancy Conditions

Alternatives considered (identified within I&O and consulted on):

4. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policies support the protection of rural areas, providing the opportunity for local food production and reduced food miles.</p> <p>Likelihood of effect: Possible Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>National policy also supports the protection of rural areas, providing the opportunity for local food production and reduced food miles.</p> <p>Likelihood of effect: Possible Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The policies support the protection of rural areas as undeveloped land, aiding adaptation to climate change by providing a cooling effect to urban areas, flood protection and water catchment (through natural landscapes absorbing water) and carbon storage (by plants and soils).</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, with a negative effect.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓</p> <p>The policies limit development in rural areas, indirectly preventing the loss of wildlife, habitats and</p>	<p>×</p> <p>The policy expands on the national policy in relation to rural workers,</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>geological features.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, with a negative effect.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓</p> <p>The policies limit development in rural areas, thus protecting the characteristic landscape of the Borough.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, with a negative effect.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	pollution and improve the quality of air, water and contaminated land			
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓</p> <p>The policies support genuine rural businesses which can demonstrate accommodation needs on-site or in the immediate vicinity.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Where a genuine business need exists, the policy follows national policy; as such there would be no change in effect.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>Whilst the policies limit development within rural areas for the majority of people, it also supports local housing need for rural workers and the Local Plan process has allocated sufficient land to meet development needs.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, increasing the supply of housing.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policies support the maintenance of rural areas as open areas, offering the potential for tranquillity, recreation etc which can enhance human health and wellbeing.</p> <p>Likelihood of effect: Possible Spatial scale: Rural areas and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, with a negative effect to the wider population.</p> <p>Likelihood of effect: Possible Spatial scale: Rural areas and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	0	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>The limitation of development in rural areas focusses development to other areas where essential services, facilities and infrastructure is typically provided.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made. Given these would be likely to be small in scale, they are unlikely to be accompanied by improvements to services, facilities and infrastructure – a negative effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of	<p>✓</p> <p>The limitation of development in rural areas focusses development to other areas where travel choice and accessibility is typically greater.</p>	<p>×</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	journeys	<p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>locally. Without this local detail, many more applications for rural workers dwellings would be made. Given these would be likely to be small in scale, they are unlikely to be accompanied by improvements to travel choice and accessibility – a negative effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>The limitation of development in rural areas focusses development to other areas, improving the efficiency in land use, including the use of previously developed land. The policy provides further local detail as to the replacement of buildings and re-use of buildings.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p> <p>Suggested amendments:</p> <ol style="list-style-type: none"> 5. Clarify where the policy applies (countryside, Green Belt). 6. Clarify/define terms used in document e.g. rural workers, agricultural, forestry, equestrian, horticultural are used interchangeably. 	<p>×</p> <p>The policy expands on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made, with a negative effect.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Policy amended:</p> <ol style="list-style-type: none"> 5. Completed. 6. The term 'rural worker' is used consistently throughout 7. 'recently' has now been defined in the supporting text. 8. Policy now states that evidence required for criteria (i) to (vii)

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		7. Consider defining 'recently' disposed of within the supporting text. 8. Clarify which tests evidence are required for.		

Summary:

The policies expand on the national policy in relation to rural workers, identifying how it is to be applied locally. Without this local detail, many more applications for rural workers dwellings would be made. As such, the effect of the alternative 'no policy' approach would be more potentially negative. The policies offers strong positive effects in relation to climate adaptation, wildlife and habitats, landscape, economy and employment, human health and wellbeing, accessible services, travel choice and land use. In line with national policy, these significant benefits are to the detriment of the ability to meet housing need; however the Local Plan process has allocated sufficient land to meet development needs.

LP15 Equestrian Uses

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policy prioritises use of existing buildings over new facilities, offering the potential for reduced emission of greenhouse gases through construction.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short</p>	<p>✓*</p> <p>Whilst re-use of buildings will reduce construction emissions, any new building is likely to be more energy efficient. Therefore the effect without this policy is uncertain.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The policy supports developments which are appropriate in terms of siting, whilst this isn't specific to issues such as flood risk, other policies within the plan will apply.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Without the policy there are other policies in the BFLP which will protect these issues.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
3	To conserve and enhance the diversity of wildlife, habitats and	<p>✓</p> <p>The policy requires development not to</p>	<p>✓</p> <p>Without the policy there are other</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	geology	<p>cause harm to a site of nature conservation that cannot be satisfactorily mitigated; in addition other policies within the plan will apply.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>policies in the BFLP which will protect these issues.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓</p> <p>The policy requires development not to cause harm to landscape or historic value that cannot be satisfactorily mitigated; in addition other policies within the plan will apply.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Without the policy there are other policies in the BFLP which will protect these issues.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	<p>✓</p> <p>The policy requires development not to have a detrimental effect on the amenity of neighbouring properties or the local area through unacceptable activity, noise, smell, light pollution, overlooking, traffic or other general disturbance.</p> <p>Likelihood of effect: Likely</p>	<p>✓</p> <p>Without the policy there are other policies in the BFLP which will protect these issues.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	Term: Short, medium and long term	
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	✓ The policy supports equestrian uses within the countryside area which can be an important part of the rural economy. Support for commercial equestrian facilities within the green belt requires a robust business case to demonstrate very exceptional circumstances (in line with national policy). Likelihood of effect: Likely Spatial scale: Countryside areas Temporary/permanent: Permanent Term: Short, medium and long term	✓ With no policy in place, the policy Green Belt will cover this issue. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	✓ The policy supports equestrian uses which can indirectly provide access to education and skills. Likelihood of effect: Possible Spatial scale: Borough wide	✓ Without the policy there are other policies in the BFLP which will cover these issues. Likelihood of effect: Likely Spatial scale: Borough	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Temporary/permanent: Permanent Term: Short, medium and long term	Temporary/permanent: Permanent Term: Short, medium and long term	
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	✓ The policy supports equine based development where it will not have a detrimental effect on neighbouring properties. Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✓ Without the policy there are other policies in the BFLP which will protect these issues. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	N/A
12	To protect and enhance human health and wellbeing	✓ The policy supports appropriate equine developments; recreational activities can enhance human health and wellbeing. Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✓ Without the policy there are other policies in the BFLP which will protect these issues. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>✓</p> <p>The policy supports appropriate equine developments which can help to create and sustain vibrant, locally distinctive and socially cohesive communities.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Without the policy there are other policies in the BFLP which will protect these issues.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>The policy supports well located proposals which are well connected to the existing bridleway network.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>With no policy in place, the requirement for proposals to be well connected to the existing bridleway network would be omitted and proposals could be poorly located.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The policy supports proposals which will not have adverse effects on the road or highway safety of the area and are well connected to the existing bridleway network.</p>	<p>✓ ✗</p> <p>Without the policy there are other policies in the BFLP which will protect these issues, however, this policy will specifically ensure equestrian uses are situated in locations where access to busy</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	roads by horses is not necessary. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	✓ The policy supports the re-use of existing buildings, development of a size and scale for its intended use in relation to the associated fields and demonstration of adequate land within the overall site to support the proper care of the horses. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✗ With no policy in place, the requirement for proposals to demonstrate that there is adequate land within the overall site to allow for the proper care of horses would be omitted. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A

Summary:

The inclusion of a policy specific to equestrian developments clarifies the policy position in relation to equestrian facilities, particularly in conjunction with the Green Belt policy. It allows specific requirements for the provision of adequate land within overall sites to allow proper care of horses, proposals being well located to the existing bridleway network, not having adverse effects on the road or highway safety of the area.

LP16 Green Belt

Alternatives considered (identified within I&O and consulted on):

5. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policy supports the protection of the Green Belt, providing the opportunity for local food production and reduced food miles.</p> <p>Likelihood of effect: Possible Spatial scale: Green Belt and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>National policy also supports the protection of the Green Belt, providing the opportunity for local food production and reduced food miles.</p> <p>Likelihood of effect: Possible Spatial scale: Green Belt and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The policy supports the protection of the Green Belt as undeveloped land, aiding adaptation to climate change by providing a cooling effect to urban areas, flood protection and water catchment (through natural landscapes absorbing water) and carbon storage (by plants and soils). The large continuous nature of the Green Belt provides the opportunity for wildlife corridors across large areas, offering the potential for species migration in response to climate change. The effectiveness of the Green Belt in providing climate</p>	<p>✗</p> <p>The policy expands on the national policy in relation to the Green Belt, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Green Belt and wider catchments Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
		<p>adaptation is partly dependent on other land management policies and measures.</p> <p>Likelihood of effect: Likely Spatial scale: Green Belt and wider catchments Temporary/permanent: Permanent Term: Short, medium and long term</p>		
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓</p> <p>The policy limits development in the Green Belt, indirectly preventing the loss of wildlife, habitats and geological features. The large continuous nature of the Green Belt provides excellent opportunities for a network of linked habitats.</p> <p>Likelihood of effect: Likely Spatial scale: Green Belt and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>The policy expands on the national policy in relation to the Green Belt, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Green Belt and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓</p> <p>The policy limits development in the Green Belt, thus protecting the characteristic landscape of the Borough. Where the policy deviates from national policy, it advocates replacement of a building where the alternative siting demonstrably improves the openness of the Green Belt.</p> <p>Likelihood of effect: Likely Spatial scale: Green Belt and surrounding area</p>	<p>✗</p> <p>The policy expands on the national policy in relation to the Green Belt, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Green Belt and surrounding area Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
		Temporary/permanent: Permanent Term: Short, medium and long term	term	
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓ x</p> <p>The policy limits economic growth within the Green Belt, in line with national policy. Any such development would need to provide evidence of 'very special circumstances'.</p> <p>Syngenta is dealt with in a separate policy.</p> <p>Likelihood of effect: Likely Spatial scale: Green Belt Temporary/permanent: Permanent</p>	<p>x</p> <p>The policy expands on the national policy in relation to the Green Belt, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Rural areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
		Term: Short, medium and long term		
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	<p>✘</p> <p>The policy limits development within the Green Belt, in line with national policy. Any such development would need to provide evidence of 'very special circumstances'.</p> <p>Likelihood of effect: Likely Spatial scale: Local to Green Belt Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✘</p> <p>The policy limits development within the Green Belt, in line with national policy. Any such development would need to provide evidence of 'very special circumstances'.</p> <p>Likelihood of effect: Likely Spatial scale: Local to Green Belt Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✘</p> <p>The policy limits development within the Green Belt, in line with national policy. Any such development would need to provide evidence of 'very special circumstances'. However the Local Plan process has allocated sufficient land to meet development needs.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✘</p> <p>The policy expands on the national policy in relation to the Green Belt, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policy supports the maintenance of</p>	<p>✘</p> <p>The policy expands on the</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
		<p>the Green Belt as open areas, offering the potential for tranquillity, recreation etc which can enhance human health and wellbeing.</p> <p>Likelihood of effect: Possible Spatial scale: Green Belt and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>national policy in relation to the Green Belt, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Possible Spatial scale: Green Belt and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>?</p> <p>Limitation of development in the Green Belt may restrain the development of community facilities; however may also allow existing communities to be retained.</p> <p>Likelihood of effect: Possible Spatial scale: Green Belt Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>?</p> <p>Limitation of development in the Green Belt may restrain the development of community facilities; however may also allow existing communities to be retained.</p> <p>Likelihood of effect: Possible Spatial scale: Green Belt Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
16	To provide accessible essential	✓	✓	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
	services, facilities and infrastructure.	<p>The limitation of development in the Green Belt focusses development to other areas where essential services, facilities and infrastructure is typically provided.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>The limitation of development in the Green Belt focusses development to other areas where essential services, facilities and infrastructure is typically provided.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The limitation of development in the Green Belt focusses development to other areas where travel choice and accessibility is typically greater. National policy permits 'local transport infrastructure which can demonstrate a requirement for a Green Belt location', thus providing the ability to improve travel choice and accessibility and shorted the length and duration of journeys where the location can be justified.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>The limitation of development in the Green Belt focusses development to other areas where travel choice and accessibility is typically greater. National policy permits 'local transport infrastructure which can demonstrate a requirement for a Green Belt location', thus providing the ability to improve travel choice and accessibility and shorted the length and duration of journeys where the location can be justified.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>The limitation of development in the Green Belt focusses development to other areas, improving the efficiency in land use, including the use of previously developed land. The policy provides further local detail as to the replacement of buildings and re-use of buildings. It also defines five villages in which limited infilling is permitted; this represent a reduction of three villages from the previous policy and a reduction in the types of development permitted within these villages, offering greater protection to the Green Belt.</p> <p>Suggested text changes:</p> <ol style="list-style-type: none"> 1. Amend wording of introduction to be clear that the policy applies in addition to the national policy. 2. Clarify wording of introduction in relation to permitted development rights. 3. Amend wording to clarify that 'development' rather than 'new buildings' will be considered inappropriate. <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The limitation of development in the Green Belt focusses development to other areas, improving the efficiency in land use, including the use of previously developed land.</p> <p>However, the additional details provided in the policy regarding green belt villages is not provided in national policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<ol style="list-style-type: none"> 1. Change made. 2. Change made. 3. The terms 'new buildings' and 'developments' are used appropriately within the policy.

Summary:

The policy follows and expands upon national policy in relation to local circumstances. As such, the effect of the alternative 'no policy' approach would be more uncertain and potentially negative. The policy offers strong positive effects in relation to climate adaptation, wildlife and habitats, landscape and historic, human health and wellbeing, accessible services, travel choice and land use. In line with national policy, these significant benefits are potentially to the detriment of future economic growth in the Green Belt and the ability to meet housing need; however the Local Plan process has allocated sufficient land to meet development needs.

LP17 Developed Site in the Green Belt: Jealott's Hill International Research Centre

This policy was introduced at the Draft BFLP stage, it was not proposed at the Issues and Options stage.

Alternatives considered:

1. No policy. Assess each application on a case by case basis, using national guidance and policy LP16 Green Belt.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policy supports the protection of the Green Belt, providing the opportunity for local food production and reduced food miles.</p> <p>Likelihood of effect: Possible Spatial scale: Green Belt and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>National policy also supports the protection of the Green Belt, providing the opportunity for local food production and reduced food miles.</p> <p>Likelihood of effect: Possible Spatial scale: Green Belt and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The policy supports the protection of the Green Belt as undeveloped land, aiding adaptation to climate change by providing a cooling effect to urban areas, flood protection and water catchment (through natural landscapes absorbing water) and carbon storage (by plants and soils). The large continuous nature of the Green Belt provides the opportunity for wildlife corridors across large areas, offering the potential for species migration in response to climate change. The effectiveness of</p>	<p>✗</p> <p>The policy expands on the national policy in relation to the Green Belt, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Syngenta and wider catchments Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
		<p>the Green Belt in providing climate adaptation is partly dependent on other land management policies and measures.</p> <p>Likelihood of effect: Likely Spatial scale: Syngenta and wider catchments Temporary/permanent: Permanent Term: Short, medium and long term</p>		
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓</p> <p>The policy limits development in the Green Belt, indirectly preventing the loss of wildlife, habitats and geological features. The large continuous nature of the Green Belt provides excellent opportunities for a network of linked habitats.</p> <p>Likelihood of effect: Likely Spatial scale: Syngenta and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>The policy expands on the national policy in relation to the Green Belt, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Syngenta and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓ ✗</p> <p>The policy limits development in the Green Belt, thus protecting the characteristic landscape of the Borough. Where the policy deviates from national policy, it advocates replacement of a building where the alternative siting does not have a greater impact on the openness and undeveloped character of the Green Belt.</p> <p>Recommendation: <i>Partial or complete redevelopment</i></p>	<p>✗</p> <p>The policy expands on the national policy in relation to the Green Belt, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Syngenta and surrounding area Temporary/permanent: Permanent Term: Short, medium and long</p>	<p>✓</p> <p>Text amended to '<i>Partial or complete redevelopment proposals will be permitted provided that they would :</i></p> <ol style="list-style-type: none"> i. <i>not lead to an over intensification of the site;</i> and ii. <i>result in environmental improvement to the site'</i>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
		<p><i>proposals should also</i> – reconsider wording to strengthen policy.</p> <p>Likelihood of effect: Likely Spatial scale: Syngenta and surrounding area Temporary/permanent: Permanent Term: Short, medium and long term</p>	term	
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓</p> <p>The policy supports infilling and/or partial or complete redevelopment within the existing building envelope under certain conditions, along with partial or complete redevelopment proposals. It recognises that there may need to be redevelopment</p>	<p>×</p> <p>The policy expands on the national policy in relation to the Green Belt, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
		<p>of the Jealott's Hill site to meet changing business needs which could give the opportunity for the maintenance or enhancement of employment.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Temporary/permanent: Permanent Term: Short, medium and long term</p>	
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	<p>x</p> <p>The policy limits development within the Green Belt, in line with national policy. Any such development would need to provide evidence of 'very special circumstances'.</p> <p>Likelihood of effect: Likely Spatial scale: Local to Syngenta Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The policy limits development within the Green Belt, in line with national policy. Any such development would need to provide evidence of 'very special circumstances'.</p> <p>Likelihood of effect: Likely Spatial scale: Local to Syngenta Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>x</p> <p>The policy limits development within the Green Belt, in line with national policy. Any such development would need to provide evidence of 'very special circumstances'. However the Local Plan process has allocated sufficient land to meet development needs.</p> <p>Likelihood of effect: Likely</p>	<p>x</p> <p>The policy expands on the national policy in relation to the Green Belt, identifying how it is to be applied locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
		Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	Term: Short, medium and long term	
12	To protect and enhance human health and wellbeing	✓ The policy supports the maintenance of the Green Belt as open areas, offering the potential for tranquillity, recreation etc which can enhance human health and wellbeing. Likelihood of effect: Possible Spatial scale: Local to Syngenta Temporary/permanent: Permanent Term: Short, medium and long term	✖ The policy expands on the national policy in relation to the Green Belt, identifying how it is to be applied locally. Likelihood of effect: Possible Spatial scale: Local to Syngenta Temporary/permanent: Permanent Term: Short, medium and long term	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	?/✓ Limitation of development in the Green Belt may restrain the development of community facilities; however may also allow existing communities to be retained.	? Limitation of development in the Green Belt may restrain the development of community facilities; however may also	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
		<p>✓</p> <p>The Syngenta site currently houses a community Landshare (allotment); this is not included within the mapped built envelope of the Jealott's Hill Research Centre and as such is protected by Green Belt policy. This is positive.</p> <p>Likelihood of effect: Possible Spatial scale: Local to Syngenta/Borough wide Temporary/permanent: Permanent Term: short, medium and long term</p>	<p>allow existing communities to be retained.</p> <p>National policy provides less clarity to the position of the community Landshare.</p> <p>Likelihood of effect: Possible Spatial scale: Local to Syngenta/Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>The limitation of development in the Green Belt focusses development to other areas where essential services, facilities and infrastructure is typically provided.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>The limitation of development in the Green Belt focusses development to other areas where essential services, facilities and infrastructure is typically provided.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The limitation of development in the Green Belt focusses development to other areas where travel choice and accessibility is typically greater. National policy permits</p>	<p>✓</p> <p>The limitation of development in the Green Belt focusses development to other areas where travel choice and</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendations
		<p>'local transport infrastructure which can demonstrate a requirement for a Green Belt location', thus providing the ability to improve travel choice and accessibility and shorted the length and duration of journeys where the location can be justified.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>accessibility is typically greater. National policy permits 'local transport infrastructure which can demonstrate a requirement for a Green Belt location', thus providing the ability to improve travel choice and accessibility and shorted the length and duration of journeys where the location can be justified.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
18	<p>To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.</p>	<p>✓</p> <p>The limitation of development in the Green Belt focusses development to other areas, improving the efficiency in land use, including the use of previously developed land.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The limitation of development in the Green Belt focusses development to other areas, improving the efficiency in land use, including the use of previously developed land.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	

Summary:

The policy follows and expands upon national and local Green Belt policy in relation to the Syngenta site in the Green Belt. As such, the effect of the alternative 'no policy' approach would be more uncertain and potentially negative. The policy offers clarity in relation to the Syngenta site, a key employment site. The policy supports infilling and/or partial or complete redevelopment within the existing building envelope under certain conditions, along with partial or complete redevelopment proposals. It recognises that there may need to be redevelopment of the Jealott's Hill site to meet changing business needs which could give the opportunity for environmental improvements to the site and the maintenance or enhancement of employment. Any proposals for development beyond the defined built envelope would need to be justified by very special circumstances. There are strong positive effects in relation to climate adaptation, wildlife and habitats, landscape and historic, economy and employment, human health and wellbeing, accessible services, travel choice and land use. In line with national policy, these significant benefits are potentially to the detriment of the ability to meet housing need; however the Local Plan process has allocated sufficient land to meet development needs.

LP18 Design

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policy supports the good design to promote energy efficiency, solar orientation and retention of existing ecology.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Without a specific focus on both design and ecology the benefits may not be fully effective</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓ ✗</p> <p>The policy promotes the retention of ecology, and provision for drainage and solar orientation.</p> <p>Lack of recognition of overheating in the policy, suggest including this.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Without a need to focus on overheating, there is no national policy in this area. Wider design builds upon the NPPF</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Planning response: The adopted Design SPD includes reference to sustainable construction and the Sustainable Resource SPD is in place. It is considered that overheating would be captured when looking at solar orientation and design i.e. the siting and design of buildings to make the best of the sun's energy and there will be a range of design solutions to help avoid overheating. It is likely that alternative approaches will be looked at in the revision to the existing SPD.</p> <p>SA response: The risk of</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
				<p>overheating in homes is increasing and current methods of construction are having an effect on this. Whilst the resolution is in good design (e.g. solar orientation, materials used in construction, breathability, movement of hot air), it is considered that this is an important enough issue to be covered in the Design Policy, to ensure it actually happens.</p> <p>Conclusion: ✓ A specific reference to designing buildings to prevent overheating is now included in the Design Policy. This has positive effects on the SA Objective.</p>
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓ The policy promotes the prevention and enhancement of habitats and wildlife. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x The policy promotes the retention of existing ecology building on from the national policy. Without this, many existing areas may be removed and replaced with lower grade landscape. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent:</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
			Permanent Term: Short, medium and long term	
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	✓ The policy seeks to retain, enhance and develop local character. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	x The policy expands national policy in relation to existing and new characteristics. Without this policy, development particularly in rural areas may not be in keeping with the local character and landscape. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	✓ The policy includes well designed facilities for the collection and recycling of materials. Alignment with the Sustainable Construction policy Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	x Without this policy, a lack of waste facilities can cause a visual impact and greater potential for inappropriate waste management through misuse. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water	✓ The policy seeks to manage the form and	x Builds upon the national policy.	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	and contaminated land	<p>scale of development to minimise light and noise pollution.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	<p>✓</p> <p>The policy supports good design and having regard to solar orientation, opportunities for energy efficiency and design to prevent over-heating.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>Without a specific focus on solar orientation, opportunities for energy efficiency and design to prevent over-heating the benefits may not be fully effective.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓</p> <p>The principles of the policy support the delivery of high quality, well designed homes.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Builds upon the national policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policy promotes usable open space and amenity together with accessibility through and from the site.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>The policy expands on the national policy and its local application. Without this detail, development may not have regard to this area having a negative impact.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
13	To reduce poverty and social exclusion	<p>✓</p> <p>Good design has an ability to reduce poverty and social inclusion. The policy</p>	<p>✗</p> <p>The policy expands on the national policy and its local</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>requires design not to prejudice the wider area and would link to wider policies in this area.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>application. Without this detail, development may not have regard to this area having a negative impact.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
14	To reduce and prevent crime and the fear of crime	<p>✓</p> <p>The policy promotes the need for safe communities and preventative measures such as well lit spaces and natural surveillance.</p> <p>Suggestion: Consider referring to guidance like Secured by Design to strengthen policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>The policy expands on the national policy and its local application. Without this detail, development may not have regard to this area having a negative impact.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>It was considered not appropriate to include a reference to a specific standard when designing out crime etc -- parts of Secured by Design conflict with good urban design. Whilst urban design promotes connectivity for walking; this conflicts with crime prevention as some connectivity provides escape routes for criminals. The best guidance is considered to be found in the NPPF and Bracknell Forest's own guidance.</p>
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>✓</p> <p>The policy promotes the need for safe communities and local character together with an integrated design and layout.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide</p>	<p>✗</p> <p>The policy expands on the national policy and its local application. Without this detail, development may not have regard to this area having a negative</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Temporary/permanent: Permanent Term: Short, medium and long term	impact. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	
16	To provide accessible essential services, facilities and infrastructure.	✓ The policy promotes accessibility of the space, interconnectivity with wider areas and will link to other policies in this area Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✗ The policy expands on the national policy and its local application. Without this detail, development may not have regard to this area having a negative impact. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	✓ The policy prioritises efficient use of land, layout and form. Reference to previously developed land is not included. Likelihood of effect: Likely Spatial scale: Borough wide	✗ The policy expands on the national policy and its local application. Without this detail, development may not have regard to this area having a negative impact.	

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Temporary/permanent: Permanent Term: Short, medium and long term	Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	

Summary:

The policy expands on the national policy in relation to design, identifying how it is to be applied locally. Without this local detail, many poor quality applications would be submitted. As such, the effect of the alternative 'no policy' approach has more potential to be negative. The policy offers positive effects in relation to climate adaptation, wildlife and habitats, human health and wellbeing, social inclusion, crime prevention, social communities, travel choice and land use. Inclusion of a requirement to design buildings to prevent overheating is considered to be positive.

LP19 Tall Buildings

The policy was not identified at Issues and Options stage; the need for the policy was in part the result of the SA process.

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policy requires tall buildings to be sustainably located, which reduces the need to travel and increases choice of travel.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Without a specific requirement, large developments could be poorly located.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓ ✗</p> <p>The policy considers the general amenity, the street scene, the surrounding scale and urban form, the longer strategic views to and from the wider area, and the visual</p>	<p>✗</p> <p>The policy expands national guidance in relation to landscape and townscape to ensure</p>	<p>✓</p> <p>Wording clarified to ensure borough wide application. Details of key views into Bracknell Town Centre are</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>interest of the skyline in important views. These are key benefits of creating the policy. Supporting text confirms the erosion of the quality of the setting of historic features and assets will not be acceptable.</p> <p>Suggest: Clarify wording to ensure policy applies across the borough, not just in the Bracknell town centre.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>application to tall buildings.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>included in the supporting text. This is positive and provides guidance for assessments.</p>
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	<p>x✓</p> <p>These topics are covered within other Local Plan policies. Light pollution is covered in the Pollution and Hazards policy; however the potential for light pollution from tall buildings (contributing to sky glow) is not specifically covered.</p> <p>Recommend addressing the potential for light pollution from tall buildings within the Local Plan.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent</p>	<p>x</p> <p>The policy expands national guidance in relation to light pollution from tall buildings; without the policy, the effects would be potentially more negative.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Recommendation accepted. Text added to the supporting text requiring the submission of a lighting strategy with an aim of reducing light spill from tall buildings.</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Term: Short, medium and long term		
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓</p> <p>A small proportion of the homes allocated for development within the plan, are likely to be tall buildings. The policy sets out requirements for these buildings, to ensure the appropriateness of the location and help deliver high quality, well designed and</p>	<p>✗</p> <p>The policy expands national guidance in relation to tall buildings. Whilst other policies within the plan will cover these issues to an extent, there would be a lack of specific measures for</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>affordable homes. Supporting text sets out adaptability, suitability and quality requirements for dwellings,</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>tall buildings.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policy requires amenity space and good design, which aid human health and wellbeing.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>The policy expands on the national guidance and its local application. Without this detail, development may not consider amenity space, having a negative impact.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
13	To reduce poverty and social exclusion	<p>✓</p> <p>Good design has an ability to reduce poverty and social inclusion.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>The policy expands on the national guidance and its local application resulting in less certain effects.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
14	To reduce and prevent crime and the fear of crime	<p>✓</p> <p>The policy promotes highly visible and legible entrances and activity within the streetscene; these help reduce crime and the fear of crime.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✘</p> <p>The policy expands on the national guidance and its local application. Without this detail, development may not consider this aspect, potentially having a negative impact.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>✓</p> <p>Locating tall buildings sustainably, and the provision of amenity space increase the potential to create and sustain cohesive communities.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✘</p> <p>The policy expands on the national guidance and its local application. Without this detail, development may not rconsider this aspect, potentially having a negative impact.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>The policy requires tall buildings to be located sustainably; hence services facilities and infrastructure are likely to be available.</p>	<p>✘</p> <p>The policy expands on the national guidance and its local application. Without this detail, development may not be located</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>sustainably, reducing the accessibility and availability of services, facilities and infrastructure.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The policy requires tall buildings to be located sustainably; typically this will ensure travel choice, reduced travel need.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>The policy expands on the national guidance and its local application. Without this detail, development may not be located sustainably, reducing travel choice and increasing travel need.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>Tall buildings provide efficient use of land. The policy considers design requirements for tall buildings. Locating them sustainably can lead to making use of previously developed land.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide</p>	<p>×</p> <p>The policy expands on the national guidance and its local application. Without this detail, the effect is potentially negative.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Temporary/permanent: Permanent Term: Short, medium and long term	Term: Short, medium and long term	

Summary:

The policy expands on the national guidance in relation to tall buildings. Given the likely number of high rise buildings (and dwellings) coming forward, the addition of this policy is considered positive. The policy supports sustainably located, well designed, tall buildings that take into account the wider landscape, as well as the local townscape and street scene. Without this local detail, many poor quality applications would be submitted. As such, the effect of the alternative 'no policy' approach has more potential to be negative.

LP20 Internal Residential Space Standards

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0	0	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>The policy applies minimum space standards which may affect the number of dwellings that can be provided within a development site. However, a reduced number of dwellings may result in a positive effect occurring on the quality of dwellings constructed.</p> <p>Likelihood of effect: Likely</p>	<p>x</p> <p>The local policy is required to implement the Governments technical standard. Without the local policy, the minimum standards could not be enforced.</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term		
12	To protect and enhance human health and wellbeing	✓ The policy provides minimum living standards, incorporating storage, which will have a positive impact upon wellbeing. Likelihood of effect: Possible Spatial scale: borough wide Temporary/permanent: Permanent Term: Short, medium and long term	× The local policy is required to implement the Governments technical standard. Without the local policy, the minimum standards could not be enforced.	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	0	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓ x</p> <p>Minimum internal space standards will have the impact of potentially reducing the number of dwellings that can be provided, but will improve the quality of the dwelling for occupants. Overall there is a net benefit.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The local policy is required to implement the Governments technical standard. Without the local policy, the minimum standards could not be enforced.</p>	N/A

Summary:

In order to implement the Government's technical standards a Local Plan policy must be in place. This policy is supported by local evidence on the size of recent developments, the views of residents and has been tested through the BFLP Viability Study.

LP21 Protection of Existing Housing Stock

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓</p> <p>The policy has a positive effect on the historic environment as it allows a change of use from residential where it is the only viable way of maintaining the asset.</p> <p>Likelihood of effect: Possible Spatial scale: Heritage Assets Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Without the policy the existing housing stock would not be protected and it would be easier to change the use of a heritage asset. The policy is more positive as it includes protecting heritage assets.</p> <p>Likelihood of effect: Possible Spatial scale: Heritage Assets Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓ x</p> <p>Although the policy prevents the loss of existing housing and could be considered quite restrictive to the economy and regeneration, the criteria include exceptions including delivering overriding public benefits that outweigh the loss of housing. Therefore, in certain cases a change of use could be successfully promoted.</p> <p>Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Without the policy it is possible that more housing may be changed to alternative uses which could benefit the local economy, however, if the demand for housing in the Borough is not met then this is not meeting the needs of the area.</p> <p>Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>Whilst the policy protects existing housing from being redeveloped, it is not possible to specify that all existing housing is high quality, well designed and affordable.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Without the policy the existing housing stock is not protected, which may lead to applications for change of use. In the long term, this may have a cumulative negative effect on being able to meet housing targets.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policy aims to ensure that existing housing is not lost unnecessarily, helping to protect the home of existing residents.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Without the policy it would be easier for existing housing (some of which may be occupied) to be changed to a different use or be redeveloped, not necessarily for a net gain in housing.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent:</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
			Permanent Term: Short, medium and long term	
13	To reduce poverty and social exclusion	✓ This policy will help protect the homes people may already live in from being redeveloped. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	x Without this policy it is more likely that people may need to find alternative accommodation if permission is granted for a non-residential use. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	N/A
14	To reduce and prevent crime and the fear of crime	0		N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	✓ Protecting the homes that people live in is important, particularly where there is a lack of land to meet the housing need in the Borough. However, this policy does not preclude the opportunity to redevelop existing housing to provide new housing, potentially to create a new community. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	x Without this policy it is more likely that applications to redevelop existing housing may be approved, which may not provide additional housing, and which may negatively affect community cohesion. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>Protecting existing housing as there is a shortage of land to meet a growing need is positive. Where existing housing is redeveloped to provide additional housing, this is also considered to be positive.</p> <p>Consider:</p> <p>The 4th bullet point in the policy '<i>A change of residential use is the only demonstrated viable way of ensuring the protection of a heritage asset</i>' could be misinterpreted and lead to less protection for housing. Consider amending the wording to prevent an applicant only demonstrating the option they wish to promote.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Without this policy it is more likely that people may need to find alternative accommodation if permission is granted for a non-residential use.</p> <p>Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Policy has been amended.</p>

Summary:

The policy aims to protect the existing housing stock in the Borough which has positive effects on several of the SA Objectives. In many cases it will protect homes from changing use or being redeveloped for alternative uses. The exceptions for this include redevelopment as part of a larger scheme with a greater number of dwellings, which can also

LP22 Housing for Older People

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policy requires sustainable location of specialist housing for older people.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>National policy doesn't require sustainable location of specialist housing for older people, so is more negative than with the policy in place.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓</p> <p>The policy requires no adverse impact on the character and appearance of the surrounding area.</p> <p>Likelihood of effect: Likely</p>	<p>✓ ✗</p> <p>Whilst national policy covers this issue to an extent, the local policy provides further clarity.</p> <p>Likelihood of effect: Likely</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	✓ The policy refers to housing for people aged 65 plus years. Some of these will still be working and therefore the ability to adapt homes and build new homes that meet the needs of older people in sustainable locations is positive. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent	✗ The specific needs of the borough's increasing older population may not be met. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Term: Short, medium and long term		
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>The policy will help to deliver homes for the identified need of Older People in the borough which is positive. However, the methods by which this housing will be allocated is not clear.</p> <p>Recommendation:</p> <p>Consider setting a requirement for new housing developments to incorporate a percentage of homes suitable for Older People.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The needs of Older People in the borough may not be considered in new developments.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Covered by Housing Mix policy</p>
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policy supports the provision of housing for Older People which has a positive effect on protecting human health and wellbeing, providing the need in the borough is actually met, both in market and affordable terms.</p>	<p>x</p> <p>The needs of Older People in the borough may not be considered in new developments.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent:</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	Permanent Term: Short, medium and long term	
13	To reduce poverty and social exclusion	✓ x The policy has a positive effect on this SA Objective as it will help to ensure that Older People are not excluded. However, the methods by which this housing will be allocated is not clear. Recommendation: Consider setting a requirement for new housing developments to incorporate a percentage of homes suitable for Older People. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	x Without the policy Older People are more likely to require additional care as their health requirements mean they are unable to live in their existing home. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	✓ Covered by Housing Mix policy
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	✓ x The effect on this SA Objective is positive if Older People accommodation is situated in areas with good linkages and infrastructure as set out in the policy. However, the methods by which this housing will be allocated is not clear. Recommendation:	x The needs of Older People may not be considered in developments, resulting in less social cohesion. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent:	✓ Covered by Housing Mix policy

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>Consider setting a requirement for new housing developments to incorporate a percentage of homes suitable for Older People.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Permanent Term: Short, medium and long term</p>	
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The policy requires sustainable location of specialist housing for older people with access to essential everyday services including transport, shops, community and health facilities or as part of a larger strategic allocation where the development would form part of a lifetime neighbourhood.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>National policy doesn't require sustainable location of specialist housing for older people, so is more negative than with the policy in place.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development	<p>✓ ×</p> <p>The effect on this SA Objective is positive if Older People accommodation is situated in areas with good linkages and infrastructure as set out in the policy. However, the methods by which this housing will be</p>	<p>×</p> <p>The needs of Older People may not be considered in developments.</p> <p>Likelihood of effect: Likely Spatial scale: Borough</p>	<p>✓</p> <p>Covered by Housing Mix policy</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	needs.	<p>allocated is not clear.</p> <p>Recommendation: Consider setting a requirement for new housing developments to incorporate a percentage of homes suitable for Older People.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Temporary/permanent: Permanent Term: Short, medium and long term</p>	

Summary:

The policy sets out the requirements for specialist housing for older people such as sheltered housing, extra care or registered care. Locational requirements are considered. The policy provides many positive effects when compared against the SA Objectives as the population of Older People is predicted to significantly increase during the plan period (by 90% over the next 20 years). Dwellings to meet the needs of older people and those with long term health and physical difficulties are outside the scope of this policy; they will be provided using the housing mix policy.

LP23 Self Build and Custom Built Housing

Alternatives considered (identified within I&O and consulted on):

2. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0	0	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓</p> <p>Self build will more likely promote local jobs improving the local economy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Without the policy insufficient numbers of self build plots would become available having a negative impact on this area.</p>	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ ✗</p> <p>The policy promotes local housing to meet local needs. However, the policy does not provide any guidance on where development proposals should locate the dwelling plots.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide</p>	<p>✗</p> <p>The policy provides development plots for self build. Without this local policy, these plots would not be made available.</p>	<p>✓</p> <p>New bullet point included in policy stating that location of plots to be agreed with Council.</p> <p>If developers allocate unsuitable areas then they will not have satisfied the policy</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Temporary/permanent: Permanent Term: Short, medium and long term Suggested amendment: <ul style="list-style-type: none"> Clarify where plots should be located so that developers do not allocate unsuitable plots which can later be developed by themselves if not used for self-build. 		requirement.
12	To protect and enhance human health and wellbeing	0	0	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	✓ The policy promotes self build to support locally distinctive and self reliant communities. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	× The policy provides development plots for self build. Without this local policy, these plots would not be made available.	N/A
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	accessibility, reduce the need for travel by car and shorten the length and duration of journeys			
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>The policy promotes the effective use of land to provide a distinctive local environment.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The policy provides development plots for self build. Without this local policy, these plots would not be made available.</p>	N/A

Summary:

The policy promotes the self-build and custom housebuilding, applied locally. Without this local policy, the required plots within developments would not be made available. As such, the effect of the alternative 'no policy' approach would be negative. The policy offers strong positive effects in relation to efficiency of land use, meeting local housing needs and sustaining locally cohesive communities.

LP24 Affordable Housing

Alternatives considered (identified within I&O and consulted on):

3. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0	0	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓</p> <p>The policy supports sustainable, economic development since it provides for the delivery of a range of housing to meet local needs, creating stability enabling people to live and work in the Borough and contribute to the local economy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Without a policy which links to the objectively assessed need the level of affordable housing could be subject to challenge. As a consequence, it is likely that less affordable housing will be provided which would be of less benefit' to the borough.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	<p>✓</p> <p>The policy will provide homes and stability to people unable to currently afford to buy a market home. This will enable people living in the homes to access the education and other training services offered in the borough.</p> <p>Likelihood of effect: Likely</p>	<p>x</p> <p>Without the policy it would be not possible to ensure the wide choice of high quality homes, including affordable housing as required by the NPPF. This would be of less benefit to the borough as it is likely that less affordable</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	housing will be provided. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>This is one of the policies that are specifically aimed at meeting this SA Objective. The levels of affordable housing recommended would help provide much needed housing in the borough.</p> <p>1. The wording of the actual policy seems very flexible. Suggest including priority to providing affordable housing on-site before considering accepting financial contributions. Space for housing in the borough is limited and it may therefore be more difficult to subsequently find alternative suitable sites resulting in a delay in the delivery of affordable housing. The supporting text states that viability testing and its independent review will be paid by the developer. Consider including this in the policy. Since the policy was originally reviewed the text has been amended. The policy now states that the 'Council will seek the provision of up to 35% of net new homes....'</p> <p>2. Consider omitting 'up to' from the policy. There is flexibility in the latter part of the</p>	<p>x</p> <p>Without a policy which links to the objectively assessed need the level of affordable housing could be subject to challenge. As a consequence, it is likely that less affordable housing will be provided which would be of less benefit' to the borough.</p> <p>Likelihood of effect: Very Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>1. The Council are currently reviewing their housing strategy, including looking at different delivery mechanisms. For example, they may want some commuted sums for delivery of housing on sites elsewhere. As such, this point is better dealt with in the SPD. The delivery of affordable housing will be further detailed in the new Housing Strategy and also a 'Housing Implementation' SPD. Delivery of AH will be tested as part of the whole plan viability which will include an assessment of the % threshold; the housing mix (including wheelchair accessible housing) and the implications of self build /</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>policy to reduce this, if 35% can be proven to be unviable.</p> <p>Likelihood of effect: Very Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>		<p>custom build. If the developer wanted to depart from delivery of affordable housing then a full viability assessment / justification would be required.</p> <p>2. 'up to' has been deleted. Whilst improvements have been made to the policy; the need for viability testing of the whole plan, and the potential for viability assessment by Developers, results in the potential for less affordable housing being delivered. As such the assessment remains ✓ x</p>
12	To protect and enhance human health and wellbeing	<p>✓ x</p> <p>The policy will provide much needed affordable housing in the borough which will benefit human health and wellbeing. The success of this policy when compared against the SA Objective will be dependent upon how much affordable housing is actually delivered as it is subject to viability testing.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Without the policy it is likely that less affordable housing will be delivered, which has a less positive effect on SA Objective 12.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Refer to SA11, item 1 above.</p>
13	To reduce poverty and social	<p>✓ x</p>	<p>✓ x</p>	<p>✓ x</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	exclusion	<p>Delivery of much needed affordable housing will have a positive effect on reducing poverty and social inclusion. Where more affordable housing is delivered this is more positive. A reduced effect will be experienced where viability testing has reduced or removed the requirement to provide affordable housing. Social exclusion may still occur depending upon how the affordable housing is actually built. The Housing Mix policy covers this issue.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Reliance on the NPPF is likely to result in less positive effects on this SA Objective, as less affordable housing may be delivered.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	Refer to SA11, item 1 above.
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>✓ x</p> <p>The success of this policy against the SA Objective will depend upon how this policy is actually implemented, and the amount of affordable housing that is actually delivered and in which areas.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent (Temporary for fear of crime) Term: Short, medium and long term</p>	<p>✓ x</p> <p>Similar effects to the 'with policy option'.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent (Temporary for fear of crime) Term: Short, medium and long term</p>	Refer to SA11, item 1 above.
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓ x</p> <p>Delivery of much needed affordable housing will have a positive effect on encouraging sustainable development. Where more affordable housing is delivered this is more positive. A reduced effect will be experienced where viability testing has reduced or removed the requirement to provide affordable housing. Social exclusion may still occur depending upon how the affordable housing is actually built. The Housing Mix covers this issue.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Without a policy which links to the objectively assessed need the level of affordable housing could be subject to challenge. As a consequence, it is likely that less affordable housing will be provided which would be of less benefit' to the borough.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Refer to SA11, item 1 above.</p>

Summary:

The policy sets out to meet to the need affordable housing in the borough during the plan period. This will provide a wide range of people who are currently unable to access housing in the borough to either rent or purchase their own home. This is very positive, providing the viability testing does not significantly reduce the amount actually delivered, or that developers end up paying financial sums for affordable housing to be provided elsewhere, which leads to a delay in delivery due to a shortage of suitable land. Whilst improvements have been made to the policy; the need for viability testing of the whole plan, and the potential for viability assessment by Developers, results in the potential for less affordable housing being delivered. As such the assessment remains ✓ x for this aspect of the policy.

LP25 Housing Mix – Tenure, Size and Accessibility

Alternatives considered (identified within I&O and consulted on):

4. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0	0	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓ x</p> <p>The policy should deliver the mix of housing as identified in the SHMA which is positive which in turn would provide opportunities for people living in both market and affordable housing to have stability in work. Flexibility is provided to help ensure that an individual site's specific opportunities and constraints can be taken into account.</p> <p>Suggest tightening wording of policy to help ensure delivery of required housing mix.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Without the housing mix fewer affordable homes may be constructed.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Refer to response under SA11, item 1 below.</p>
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	<p>✓ x</p> <p>The policy should deliver the mix of housing as identified in the SHMA which is positive which in turn would provide opportunities for people living in both market and affordable housing to have stability in education and work. Flexibility is provided to help ensure that an individual site's</p>	<p>x</p> <p>Without the housing mix fewer affordable homes may be constructed.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent</p>	<p>✓</p> <p>Refer to response under SA11, item 1 below.</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>specific opportunities and constraints can be taken into account.</p> <p>Suggest tightening wording of policy to help ensure delivery of required housing mix which will benefit the economy by providing much needed homes for teachers, nurses etc.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Term: Short, medium and long term</p>	
11	<p>To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home</p>	<p>✓ x</p> <p>The policy should deliver the mix of housing as identified in the SHMA which is positive which in turn would provide opportunities for people living in both market and affordable housing to have stability in education and work. Flexibility is provided to help ensure that an individual site's specific opportunities and constraints can be taken into account. The policy allows variation from the policy through 'the most up to date evidence on local housing needs'; the evidence may be updated through the lifetime of the plan.</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 1. Suggest tightening wording of policy to help ensure delivery of required housing mix. 2. Include in the policy that mix for sheltered housing etc will be dealt with separately. 	<p>x</p> <p>Without the housing mix fewer affordable homes may be constructed.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>1. Tighten policy wording: Planning response: 'and tenures' has been added into the policy. It now reads "<i>will be expected to provide a mix of dwellings <u>and tenures</u></i>". Further detail will be provided in the new Housing Strategy and also a 'wider housing SPD'. SA response: The text amendment is more positive. The Housing Strategy, SPD documents and the viability assessment are not part of the policies currently being assessed; it is not possible to assess the effect of them</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>3. Need to know percentage of homes provided in accordance with Part M(3) Category 3. Is this need based? If not, what is it based on?</p> <p>4. Will Part M cover accommodation for people with dementia who are younger than the 65 years limit in the Older Persons policy?</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>		<p>against the SA Objectives. Whilst this is not of significant concern for the overall housing mix, concern remains that viability assessment may limit the provision of dwellings suitable for wheelchair users.</p> <p>Affordable housing is considered within the SA of the Affordable Housing policy.</p> <p>2. The plan should be read as a whole, all applicable policies are not referred to throughout the document as this would be extensive.</p> <p>3. Text amended '<i>On developments of 20 or more dwellings, at least 5 % of dwellings will be constructed in accordance with the requirements of Part M(3) Category 3 - Wheelchair user dwellings of the Building Regulations 2010 (Approved Document 'M' – Access to and use of Buildings – dwellings 2015) and any subsequent updates.</i>' This is based on information on moderate severe disabilities for ages 18+ which demonstrate an existing need and a growing need going forward.</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
				<p>4. The policy has been renamed 'Housing for Older People'; it uses general terms - it does not specify an age limit. Whilst the supporting text refers to data for those aged 65 and over, it does not impose this limit on the policy.</p> <p>Given the potential to provide fewer dwellings for wheelchair users through viability assessment, the assessment remains as ✓ x for this element (and ✓ for all other elements).</p>
12	To protect and enhance human health and wellbeing	<p>✓ x</p> <p>The policy should deliver the mix of housing as identified in the SHMA which is positive which in turn would benefit human health and wellbeing. Flexibility is provided to help ensure that an individual site's specific opportunities and constraints can be taken into account.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Suggest tightening wording of policy to help ensure delivery of required housing mix. 2. Need to know percentage of homes provided in accordance with Part M(3) Category 3. Is this need based? <p>Likelihood of effect: Likely</p>	<p>x</p> <p>Without the housing mix fewer affordable homes may be constructed.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <ol style="list-style-type: none"> 1. Refer to response under SA11, item 1 above. Given the potential to provide fewer dwellings for wheelchair users, the assessment remains as ✓ x for this element. 2. Refer to response under SA11, item 3 above.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term		
13	To reduce poverty and social exclusion	✓ x The policy should deliver the mix of housing as identified in the SHMA which is positive which in turn would provide the opportunities to reduce poverty and social exclusion. Flexibility is provided to help ensure that an individual site's specific opportunities and constraints can be taken into account. Suggest tightening wording of policy to help ensure delivery of required housing mix. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	x Without the housing mix fewer affordable homes may be constructed. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	✓ Refer to response under SA11, item 1 above.
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	✓ x The policy should deliver the mix of housing as identified in the SHMA which is positive in creating vibrant and locally distinct communities. The degree by which the new communities are socially cohesive will partly depend upon how the affordable and market housing is set out in a scheme. Consider wording in policy to control how market and affordable housing is	x Without the housing mix fewer affordable homes may be constructed. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	✓ x Consider wording in policy to control how market and affordable housing is integrated

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		integrated. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term		
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	✓ x The policy should deliver the mix of housing as identified in the SHMA which is positive in producing sustainable developments. Flexibility is provided to help ensure that an individual site's specific opportunities and constraints can be taken into account. Suggest tightening wording of policy to help ensure delivery of required housing mix. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	x Without the housing mix fewer affordable homes may be constructed. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	✓ Refer to response under SA11, item 1 above.

Summary:

This policy sets out the need for a housing mix (tenure, size and accessibility) for new housing developments; the mix is set out in supporting text. The percentages are based on those from the SHMA and represent the identified need in the borough. Development of new housing to meet this need is positive,

and the flexibility provided by the final four bullet points within the policy could allow sites to be developed with a different housing mix where this makes a site viable. This can be a positive effect on several of the SA Objectives. Further detail will be provided in the new Housing Strategy and also a wider housing SPD, and tested through viability assessment. Since these documents are not part of the policies currently being assessed; it is not possible to assess the effect of them against the SA Objectives. Whilst this is not of significant concern for the overall housing mix, concern remains that viability assessment may limit the provision of dwellings suitable for wheelchair users. Given the potential to provide fewer dwellings for wheelchair users, the assessment remains as ✓✖ for this element (and ✓ for all other elements considered within SA11). Affordable housing is considered within the SA of the Affordable Housing policy. The integration of affordable and market housing on a site is not covered in this policy, however, this can affect social cohesion and therefore some of the SA Objectives. Increased positive effects may be achieved by covering this issue.

LP26 Travelling Populations

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	? This policy and the flood risk policy do not directly refer to the applicability of flood risk to GTAA sites; as such the effect is uncertain. Recommend clarity is provided.	0	✓ Response: Text has been added to the supporting text of the Travelling Populations policy to include consideration to potential flood risk and use of SuDS. The supporting text to the Flood Risk policy has been amended to clarify that sites for travelling populations should not be located in areas of high flood risk. This is positive.
3	To conserve and enhance the diversity of wildlife, habitats and geology	✓ x The policy requires that any adverse impacts on the natural environment can be mitigated. This may not include 'enhancement' as required by SA Objective 3. However, the Biodiversity policy LP36 states that proposals should enhance biodiversity by designing-in provisions for wildlife. Consider including 'and enhancement sought' into (iii) so that other natural	✓ x The NPPF and other policies proposed in the BFLP are likely to offer similar protection to these assets as that in the current policy (Travelling Populations) Likelihood of effect: Likely Spatial scale: Borough-wide Temporary/permanent: Temporary or permanent, depending upon specific effect	✓ Response: Agreed, 'and improvement sought' has been added to clause iii.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>environment issues are covered.</p> <p>Likelihood of effect: Likely Spatial scale: Borough-wide Temporary/permanent: Temporary or permanent, depending upon specific effect Term: Short, medium or long term</p>	<p>Term: Short, medium or long term</p>	
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓ x</p> <p>The policy requires that adverse impacts on historic assets and the natural environment be mitigated. This is different from enhancement as required by SA Objective 4. Consider including 'and enhancement sought' into section (iii).</p> <p>Likelihood of effect: Possible depending upon how this policy and LP35 (heritage) are implemented Spatial scale: Local / Neighbourhood Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Similar effects without the policy, as LP35 relating to heritage would be used.</p> <p>Likelihood of effect: Possible depending on how LP35 (heritage) is implemented Spatial scale: Local / Neighbourhood Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Response: Agreed, 'and improvement sought' has been added to clause iii.</p>
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	<p>✓ x</p> <p>By allocating specific areas for Gypsies and Travellers, and meeting their identified need this should reduce risk of unlawful occupation of land and waste creation often associated with it. Consider including reference to waste collection facilities in (vi)</p> <p>Likelihood of effect: Likely</p>	<p>x</p> <p>Sites would still need to be provided for Gypsies and Travellers, however, without specific allocations and a specific policy promoting this it may take longer to deliver, leaving a longer amount of time with an unmet need in the borough.</p> <p>Likelihood of effect: Likely</p>	<p>✓</p> <p>Response: Agreed, 'and waste collection' has been added to clause vi.</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Spatial scale: Borough Temporary/permanent: Permanent/Temporary Term: Short, medium and long term	Spatial scale: Borough Temporary/permanent: Permanent/Temporary Term: Short, medium and long term	
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	✓ x Section (iii) covers mitigating adverse effects on the natural environment. The Pollution and Hazards Policy covers minimising and reducing pollutants, and mitigating adverse effects. Improvement in quality of air, water and contaminated land is not specifically sought. Consider adding 'improvement sought' into the Pollution and Hazards policy and this Travelling Population. Likelihood of effect: Likely Spatial scale: In areas where Traveller pitches proposed Temporary/permanent: Permanent Term: Short, medium and long term	✓ Similar effects would occur without the policy as other BFLP policies specifically control these issues. These are LP43 and LP44. Likelihood of effect: Likely Spatial scale: In areas where Traveller pitches proposed Temporary/permanent: Permanent Term: Short, medium and long term	✓ Response: Agreed 'and improvement sought' has been added to clause iii of this policy and the Pollution and Hazards policy.
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that	✓	x	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>The policy provides pitch provision for the identified need in Gypsy and Traveller accommodation. Once settled, these families should contribute to the local economy, particularly as the policy requires integration between travelling and settled communities.</p> <p>Likelihood of effect: Likely Spatial scale: Potentially borough-wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Although accommodation for travelling communities will need to be provided, without the specific policy identifying potential areas and the policy text which requires integration between travelling and settled communities the potential positive effects from travelling communities inputting to the local economy may take longer to occur.</p> <p>Likelihood of effect: Likely Spatial scale: Potentially borough-wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	<p>✓</p> <p>Policy provides pitch provision for the identified needs of Gypsy and Traveller populations. This will enable children of these families to access stable education, and also benefit adults who will benefit from various training schemes, apprenticeships and career development / job finding advice.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Similar effects as with the Policy, except that the benefits of improved access to education and being able to contribute to the local economy may be delayed whilst the process of finding sites and getting them approved is undertaken.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>?</p> <p>This policy commits to meet the identified need for providing space for accommodation in the Gypsy and Traveller communities. However, 'the Council is still considering the results of the recent GTAA and strategy to be taken. Sites are not currently allocated to meet this need'.</p> <p>Recommendation:</p> <p>Clarify the strategy to be taken to meet need.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Without the policy the accommodation need for travelling communities will still need to be met, however, it may take longer to go through the process of identifying suitable sites once the BFLP is completed.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>?</p> <p>Response: GTAA was only finalised in October 2017, at the time of preparing this version of the plan, the Council is still considering how to meet need. This may be through safeguarding authorised sites; extending existing sites; and engaging with adjoining Authorities regarding the need for transit accommodation.</p>
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>Providing this policy is correctly applied the effect on this SA Objective will be positive as both the existing and new communities will be successfully integrated.</p> <p>Likelihood of effect: Likely Spatial scale: New Traveller sites and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Without the policy there may not be a requirement for new and existing communities to be successfully integrated.</p> <p>Likelihood of effect: Likely Spatial scale: New Traveller sites and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
13	To reduce poverty and social exclusion	<p>✓</p> <p>The policy will provide space to accommodate the identified need of</p>	<p>✓ x</p> <p>Without the policy there may not be a requirement for new and</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>Gypsies and Travellers in the borough, and successfully integrate new and existing communities.</p> <p>Likelihood of effect: Likely Spatial scale: New Traveller sites and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>existing communities to be successfully integrated.</p> <p>Likelihood of effect: Likely Spatial scale: New Traveller sites and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	
14	To reduce and prevent crime and the fear of crime	<p>✓ x</p> <p>By providing land for the identified Gypsy and Traveller need in the borough (in particular a transit site), the risk of damage to private and council owned land through trespassing and illegal occupation of land should reduce. This is not currently provided within the policy but will be part of a strategic solution. This would particularly be the case if a Transit site was provided, but this will be part of a strategic solution. The policy also identifies the need to successfully integrate new and existing communities which should reduce the fear of crime.</p> <p>Likelihood of effect: Likely Spatial scale: Traveller settlements and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Without the policy, the fear of crime between the Travelling Community and settled community may increase if the new communities are not successfully integrated into the area.</p> <p>Likelihood of effect: Likely Spatial scale: Traveller settlements and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>✓</p> <p>Applications for Gypsy and Traveller sites will be determined in line with the policy,</p>	<p>x</p> <p>The need for Traveller accommodation in the borough</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>thereby the potential to create a vibrant and locally distinctive community will exist. Providing this community is successfully integrated with existing settled communities it is likely to be socially cohesive.</p> <p>Likelihood of effect: Likely Spatial scale: Local Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>will still need to be met. Without the policy there is a higher risk that the existing settled community and Traveller community are not socially cohesive.</p> <p>Likelihood of effect: Likely Spatial scale: Local Temporary/permanent: Permanent Term: Short, medium and long term</p>	
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>The policy requires good access to local services and safe access to sustainable transport options and the highway.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Other policies in the BFLP (for example, the transport policies) require good access to local services and safe access to sustainable transport options and the highway in any new development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>Although the policy states that the pitches should have good access to local services and safe access to the highway, and sustainable transport options, it does not specifically improve travel choice. Careful</p>	<p>✓</p> <p>The Transport policies will address these issues.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent:</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>positioning of the sites will help to reduce need for car travel and shorten length of journeys. The Transport policies will address these issues.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Permanent Term: Short, medium and long term</p>	
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	0	0	

Summary:

This policy will help to meet the identified need for accommodation in the Travelling Community. When considered along with other relevant policies in the BFLP (for example, those relating to pollution, heritage and transport) the policy has generally positive effects on the Sustainability Objectives. The effects on the SA Objectives are more positive with the policy than without it. This is mainly related to the need to ensure new and existing communities are well-integrated.

Economic Development policies: LP27 Employment Areas; LP28 Employment Development outside Employment Areas; LP29 Smaller Businesses

Note: this assessment is based solely on the policy text – not on specific site allocations.

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>On the whole, the suite of policies direct employment development towards defined employment areas and town centres where sustainable modes of transport are more likely to be available. Outside of these areas, BIDS uses within mixed use developments are supported. Large employment sites must demonstrate a sequential approach to location and transport implications. Preventing the loss of employment land to other uses, will support the maintenance of a local employment base.</p> <p>The causes of climate change from economic uses directly (rather than relating to their siting), is covered by the relevant DM policies.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Without the policies, there would be less emphasis on suitably locating BIDS developments. National policy would be relied upon.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding,	<p>0</p> <p>Covered by the relevant DM policies.</p>	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	heat wave, drought and storm damage.			
3	To conserve and enhance the diversity of wildlife, habitats and geology	0 Covered by the relevant DM policies.	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0 Covered by the relevant DM policies.	0	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0 Covered by the relevant DM policies.	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	<p>✓</p> <p>Outside defined employment areas, business, industry, distribution and storage uses (BIDS) development will be supported where it does not have unacceptable adverse impacts on nearby residents, other businesses or other uses including impacts caused by transport movements, noise, fumes, hours of operation and lighting. Requirements for small businesses are limited to not resulting in unacceptable harm to highway safety or residential amenity.</p> <p>Whilst these requirements are relatively limited, further controls are in place through the relevant DM policies. As such the</p>	<p>×</p> <p>Under permitted development, the Council has much less control over the effects of developments.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>overall effect is considered positive.</p> <p>Recommend the following:</p> <ol style="list-style-type: none"> LP28 - Recommend replacing the word 'fumes' with the wider ranging 'emissions'. LP29 - Small and start-up businesses could potentially be, for example, noisy or polluting. Recommend strengthening the requirements. <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>		<ol style="list-style-type: none"> Change accepted. Change not considered necessary – outside of employment areas, policy LP28 will apply so there is no need to repeats its contents in LP29.
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	<p>0</p> <p>Covered by the relevant DM policies.</p>	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	<p>0</p> <p>Covered by the relevant DM policies.</p>	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓</p> <p>Development (or conversion) within defined Employment Areas for non-BIDS uses is resisted through the policy (and Article 4 directions). Proposals for the loss of smaller business units will not normally be permitted.</p> <p>The policies support BIDS uses within defined Employment areas; BIDS uses outside of defined Employment Areas under certain circumstances; and smaller</p>	<p>✗</p> <p>Without the policies (and Article 4 Directions), permitted development rights would exist permitting the large scale conversion of offices and light industrial buildings to housing. The Council would be less able to plan for the plan period. National guidance would be relied upon.</p> <p>Likelihood of effect: Likely</p>	<ol style="list-style-type: none"> Whilst it would be possible to be more specific about the need for BIDS floorspace (based on the Central Berkshire EDNA), it would not assist policy formulation as evidence suggests a lack of market interest in providing for local needs within Bracknell Forest.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>businesses, including ancillary services. Recommend the following:</p> <ol style="list-style-type: none"> 1. Overall approach - The economic development policies do not identify the level of need within the borough. Can they/should they be identified? 2. LP27/LP28 - Clarify terminology used to define employment areas to ensure policy applied across appropriate areas. 3. LP29 - Recommend defining 'ancillary services' and reviewing requirements for them (as per the current policy). <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>There is also far greater uncertainty over the forecasts (compared to housing need) due to changes in working styles, and the structure of businesses. The approach is therefore one of seeking to protect sites within defined employment areas (also supported through the Article 4 Direction), assess the scope to regenerate and intensify the use of defined employment areas and consider the scope for employment growth to be accommodated in larger employment centres in the Central Berkshire FEMA.</p> <ol style="list-style-type: none"> 2. Change complete. 3. Change not considered appropriate – the wording of the policies provides flexibility to ensure that the changing needs of business and those that are starting up, can be accommodated in line with the NPPF. Furthermore para 22 of

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
				the NPPF makes it clear that Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose, having regard to market signals.
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	<p>✓ Employment developments outside of Employment Areas are supported where they support improvements to the education and skills and initiatives to use local labour.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	0	
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✗ The policies (including support from the Article 4 Direction) will enable the Council to exercise a degree of control over the loss of existing BIDS sites to non BIDS uses including housing – limiting the number of dwellings.</p> <p>✓ This will enable the Council to deliver more sustainable neighbourhoods and help provide housing in more suitable environments where there is likely to be less tension between uses that are not</p>	<p>✓ Without the policies (and Article 4 Directions), permitted development rights would allow conversion of existing offices and light industrial buildings to housing – increasing the number of dwellings.</p> <p>✗ Under permitted development, the Council has much less control over the quality, design and affordability of dwellings; this has</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>always compatible. This should have a positive effect on the design and quality of housing.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>negative effects.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policies (including support from the Article 4 Direction) will enable the Council to exercise a degree of control over the loss of existing BIDS sites to non BIDS uses, providing the opportunity to consider the quality and design of homes, potentially enhancing wellbeing of residents.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Under permitted development, the Council has much less control over the quality and design of homes, potentially reducing wellbeing of residents.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
13	To reduce poverty and social exclusion	<p>✓</p> <p>The support for retaining and providing employment land uses to meet the identified need in the borough should have a positive effect through offering a range of employment opportunities and thereby helping to reduce poverty and social exclusion.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Reliance on national policy is likely to result in loss of local employment opportunities.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>✓</p> <p>The policies support the development of suitably sited BIDS land uses, increasing the likelihood of creating and maintaining sustainable communities.</p> <p>Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>The policies support the delivery of the identified economic need in suitable locations, allowing more accurate planning for the provision of accessible services, facilities and infrastructure.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The Council are less able to accurately plan for sustainable developments if the economic development need has not been identified.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>Through the identification of sites to help meet economic development needs in the borough the Council are then able to steer development to the most suitable locations for it, to ensure sustainable communities are developed.</p>	<p>x</p> <p>The Council are less able to accurately plan for sustainable developments if the economic development need has not been identified.</p> <p>Likelihood of effect: Likely</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	✓ Through the identification of sites to help meet economic development needs in the borough the Council are then able to steer development to the most suitable locations for it, to ensure sustainable communities are developed. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✗ The Council are less able to accurately plan for sustainable developments if the economic development need has not been identified. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	

Summary:

This suite of policies sets out the approach to helping to meet the needs for BIDS uses in the borough over the plan period. This has positive effects on several of the SA Objectives, as the Council can plan for meeting the need within the defined employment areas, and outside of these where appropriate. The policy allows flexibility to meet need: there is a degree of uncertainty as to the market appetite for the need identified in the Central Berkshire EDNA and as such the policy does not specify the level of need. The policies protect against loss of existing BIDS uses to non BIDS uses including housing through permitted development rights.

LP30 Bracknell Town Centre Policy

The policy was not proposed at the Issues and Options stage.

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0 (Dealt with in other BFLP policies)	0	
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0 (Dealt with in other BFLP policies)	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0 (Dealt with in other BFLP policies)	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓</p> <p>The policy requires the creation of a high quality, distinctive environment; that retains and enhances the setting of buildings of historic importance.</p> <p>Likelihood of effect: Likely Spatial scale: Bracknell town centre, extending to wider area Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Whilst these topics are covered within other parts of the plan, the policy is more specific in terms of the environment. As such the no policy alternative is less positive.</p> <p>Likelihood of effect: Likely Spatial scale: Bracknell town centre, extending to wider area Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0 (Dealt with in other BFLP policies)	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0 (Dealt with in other BFLP policies)	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0 (Dealt with in other BFLP policies)	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0 (Dealt with in other BFLP policies)	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	✓ The policy supports and protects the recently regenerated town centre, and the regeneration of remaining areas, to help make it a thriving place for people in the Borough and surrounding areas. Likelihood of effect: Likely Spatial scale: Bracknell town centre, extending to wider area Temporary/permanent: Permanent Term: Short, medium and long term	× Without this policy there is the potential for current economic land uses to be replaced. Likelihood of effect: Likely Spatial scale: Bracknell town centre, extending to wider area Temporary/permanent: Permanent Term: Short, medium and long term	N/A
10	Develop opportunities for	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.			
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓</p> <p>Whilst this policy potentially restricts housing being developed as a change of retail use in specific areas; it promotes housing as part of a mix of uses. Other policies will help to ensure the quality and mix of the homes.</p> <p>Likelihood of effect: Likely Spatial scale: Bracknell town centre Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Without this policy there is the potential for more housing to be developed in retail areas.</p> <p>Likelihood of effect: Likely Spatial scale: Bracknell town centre Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
12	To protect and enhance human health and wellbeing	0	0	N/A
13	To reduce poverty and social exclusion	<p>✓</p> <p>The policy supports a thriving retail centre; mixed uses in the town centre; Bracknell's role as a transport hub for the Borough; provision of infrastructure including non-car modes of transport. These provide an opportunity to reduce social exclusion.</p> <p>Likelihood of effect: Possible Spatial scale: Bracknell town centre,</p>	<p>x</p> <p>Without the policy, the retail centre is at greater risk of loss which can impact social exclusion.</p> <p>Likelihood of effect: Possible Spatial scale: Bracknell town centre, extending to wider area Temporary/permanent: Permanent</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		extending to wider area Temporary/permanent: Permanent Term: Short, medium and long term	Term: Short, medium and long term	
14	To reduce and prevent crime and the fear of crime	✓ Policy supports the creation of a high quality well design environment and public realm that helps reduce crime and the fear of crime. Likelihood of effect: Likely Spatial scale: Bracknell town centre, extending to wider area Temporary/permanent: Permanent Term: Short, medium and long term	✓ Crime and the fear of crime are also dealt with in the Design policy. Likelihood of effect: Likely Spatial scale: Bracknell town centre, extending to wider area Temporary/permanent: Permanent Term: Short, medium and long term	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	✓ The policy supports a diverse, vital, viable centre; a mix of uses; with necessary infrastructure. These all help support cohesive communities. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	✗ Without the policy there would be less protection and direction for the town centre potentially affecting social cohesion. Likelihood of effect: Possible Spatial scale: Borough and wider areas Temporary/permanent: Permanent Term: Short, medium and long term	N/A
16	To provide accessible essential services, facilities and infrastructure.	✓ The policy supports a mix of uses; the town's role as a transport hub; and the provision of necessary infrastructure	✓ ✗ Without the policy there would be less protection for retail areas, leaving them more open to a	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>including non-car modes of transport.</p> <p>Likelihood of effect: Likely Spatial scale: Borough and wider area Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>change of use that may not benefit the local community, and may result in increased travelling.</p> <p>Likelihood of effect: Likely Spatial scale: Borough and wider areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The policy supports a mix of uses; the town's role as a transport hub; and the provision of necessary infrastructure including non-car modes of transport. By protecting the Primary Shopping Area, retail frontages are more likely to remain active, supporting local people to meet their needs locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Without the policy there would be less protection for retail areas, leaving them more open to a change of use that may not benefit the local community, and may result in increased travelling.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>The recently regenerated town centre is protected within the policy; whilst supporting the regeneration of remaining areas of the town centre, including a mix of uses where they do not harm the Primary Shopping Area.</p>	<p>✗</p> <p>Without the policy there would be less protection for the regenerated town centre, leaving it more open to a change of use that may not benefit the local community, and may result in</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	increased travelling. Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	

Summary:

The policy protects the recently regenerated Northern Retail Quarter of the town centre, whilst supporting regeneration of the remaining areas. It encourages a diversity of uses which contribute to making the centre vibrant.

LP31 Out of Centre Development

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0	0	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A

	SA Objective	Appraisal of policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓</p> <p>The policy supports the new Lexicon retail scheme and other neighbourhood centres to help ensure that the Lexicon is given chance to establish.</p> <p>Likelihood of effect: Likely Spatial scale: Borough and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Without the policy the higher NPPF threshold for retail impact assessments to be carried out will be applied (2,500 sqm instead of 1,000 sqm). This will not offer such protection to the new Lexicon scheme and existing centres.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the	0	0	N/A

	SA Objective	Appraisal of policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	opportunity to live in a high quality, well designed and affordable home			
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policy supports the existing town and neighbourhood centres, helping to ensure local retail needs can be met close to home, whilst supporting the redeveloped Lexicon scheme in Bracknell town centre.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>With the higher NPPF threshold it is possible that new or existing retail centres could be developed between 1,000 sqm and 2,500 sqm without requiring a retail impact assessment to be undertaken. Whilst this has the potential to offer residents a greater and more local retail offer, there is also the potential for any schemes to undermine the success of the Lexicon scheme which could have negative effects on health and wellbeing if the town centre becomes underused.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
13	To reduce poverty and social exclusion	<p>✓</p> <p>Thriving town and neighbourhood have the potential to help reduce poverty (provision of employment and services) and also provide areas all residents can benefit from.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide and</p>	<p>✓ x</p> <p>If the success of existing centres is compromised by new or enlarged schemes, the effect of which have not been thoroughly assessed, existing centres may struggle to survive and become</p>	N/A

	SA Objective	Appraisal of policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>surrounding areas</p> <p>Temporary/permanent: Permanent</p> <p>Term: Short, medium and long term</p>	<p>less desirable and safe places.</p> <p>Likelihood of effect: Likely</p> <p>Spatial scale: Borough wide</p> <p>Temporary/permanent: Permanent</p> <p>Term: Short, medium and long term</p>	
14	To reduce and prevent crime and the fear of crime	<p>✓</p> <p>Thriving town and neighbourhood centres will help to reduce and prevent crime.</p> <p>Likelihood of effect: Likely</p> <p>Spatial scale: Borough wide</p> <p>Temporary/permanent: Permanent</p> <p>Term: Short, medium and long term</p>	<p>×</p> <p>If high vacancy rates occur in town and neighbourhood centres due to newly competing centres, the risk and fear of crime may increase.</p> <p>Likelihood of effect: Likely</p> <p>Spatial scale: Borough wide</p> <p>Temporary/permanent: Permanent</p> <p>Term: Short, medium and long term</p>	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>✓</p> <p>Thriving town and neighbourhood centres will help to create locally distinctive and socially cohesive communities.</p> <p>Likelihood of effect: Likely</p> <p>Spatial scale: Borough wide</p> <p>Temporary/permanent: Permanent</p> <p>Term: Short, medium and long term</p>	<p>×</p> <p>If high vacancy rates occur in town and neighbourhood centres due to newly competing centres, less vibrant and socially cohesive communities may be created.</p> <p>Likelihood of effect: Likely</p> <p>Spatial scale: Borough wide</p> <p>Temporary/permanent: Permanent</p> <p>Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>Thriving town and neighbourhood centres will provide accessible services for all the community and enable other facilities and infrastructure to be designed accordingly.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>If high vacancy rates occur in town and neighbourhood centres due to newly competing centres, local communities may have to travel further for services and other facilities.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>Through concentrating retail development in identified areas, the necessary infrastructure can be designed accordingly. Larger retail schemes would need to have travel choice and accessibility considered at the planning stage.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Without the policy, applications for retail schemes between 1,000 sqm and 2,500 sqm would still need to be accompanied by a transport assessment, however, if existing centres are consequently less viable, residents may end up travelling further to access services.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
18	To encourage sustainable development by improving efficiency in land use, design and	<p>✓</p> <p>The policy supports existing retail centre,</p>	<p>✗</p> <p>New retail development would</p>	N/A

	SA Objective	Appraisal of policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	layout. This includes making best use of previously developed land in meeting future development needs.	<p>and seeks to protect them, especially the newly redeveloped Lexicon.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>require a retail assessment to be undertaken from 1,000 sqm instead of the higher NPPF 2,500 sqm. This should help to protect existing retail land uses which have been used in the West Berkshire Authorities Retail and Commercial Leisure Assessment 2016.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	

Summary:

The policy reduces the threshold at which a retail assessment will be required from the national 2,500 sqm to 1,000 sqm. This is primarily to protect the newly redeveloped Lexicon scheme in Bracknell town centre, and enable it to become established. The Lexicon scheme has been assumed to be successful in the West Berkshire Authorities Retail and Commercial Leisure Assessment 2016, therefore this policy will help to ensure this happens, and new retail developments do not result in it becoming less viable. This policy not only has positive effects on the retail related SA Objective, but also those relating to sustainable development, crime, community cohesiveness and travel choice.

LP32 Change of Use within Defined Retail Areas

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0 (Dealt with in other BFLP policies)	0	
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0 (Dealt with in other BFLP policies)	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0 (Dealt with in other BFLP policies)	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0 (Dealt with in other BFLP policies)	0	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0 (Dealt with in other BFLP policies)	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0 (Dealt with in other BFLP policies)	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0 (Dealt with in other BFLP policies)	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0 (Dealt with in other BFLP policies)	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	✓ The policy supports and protects the recently regenerated town centre and other retail centres to help make them thriving places for people in the Borough and surrounding areas. Likelihood of effect: Likely Spatial scale: Borough and wider areas Temporary/permanent: Permanent Term: Short, medium and long term	✗ Without this policy there is the potential for current economic land uses to be replaced. Likelihood of effect: Likely Spatial scale: Borough, and wider areas Temporary/permanent: Permanent Term: Short, medium and long term	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	✓ Whilst this policy potentially restricts housing being developed as a change of retail use in specific areas; it promotes housing in vacant upper floors. Other	✓ Without this policy there is the potential for more housing to be developed in retail areas.	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>policies will help to ensure the quality and mix of the homes.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Likelihood of effect: Likely Spatial scale: Borough and wider areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	
12	To protect and enhance human health and wellbeing	0	0	N/A
13	To reduce poverty and social exclusion	<p>✓</p> <p>The policy supports thriving retail centres across the borough; ensuring greater accessibility to the whole population, potentially reducing social exclusion.</p> <p>Likelihood of effect: Likely Spatial scale: Retail centres and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>Without the policy, the retail centres are at greater risk of loss which can impact social exclusion.</p> <p>Likelihood of effect: Possible Spatial scale: Retail centres and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
14	To reduce and prevent crime and the fear of crime	0 (Dealt with in other BFLP policies)	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>✓</p> <p>By identifying Primary and Secondary Retail Frontages and specifying the criteria</p>	<p>×</p> <p>Without the policy there would be less protection for retail areas,</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>to be used in assessing a proposed change of use, retail frontages are more likely to remain active, supporting local people to meet their needs locally, and help to sustain socially cohesive communities. Non-retail development can still be permitted where it meets the viability and feasibility requirements.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>leaving them more open to a change of use that may not benefit the local community, and may result in increased travelling.</p> <p>Likelihood of effect: Likely Spatial scale: Borough and wider areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>By identifying Primary and Secondary Retail Frontages and specifying the criteria to be used in assessing a proposed change of use, retail frontages are more likely to remain active, supporting local people to meet their needs locally. Non-retail development can still be permitted where it meets the viability and feasibility requirements.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Without the policy there would be less protection for retail areas, leaving them more open to a change of use that may not benefit the local community, and may result in increased travelling</p> <p>Likelihood of effect: Likely Spatial scale: Borough and wider areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>By identifying Primary and Secondary Retail Frontages and specifying the criteria to be used in assessing a proposed change of use, retail frontages are more likely to remain active, supporting local people to</p>	<p>✗</p> <p>Without the policy there would be less protection for retail areas, leaving them more open to a change of use that may not benefit the local community, and</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>meet their needs locally. Non-retail development can still be permitted where it meets the viability and feasibility requirements.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>may result in increased travelling.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>By identifying Primary and Secondary Retail Frontages and specifying the criteria to be used in assessing a proposed change of use, retail frontages are more likely to remain active, supporting local people to meet their needs locally. Although this is more restrictive, non-retail development can still be permitted where it meets the viability and feasibility requirements.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>Without the policy there would be less protection for retail areas, leaving them more open to a change of use that may not benefit the local community, and may result in increased travelling.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

Summary:

The policy protects the various retail centres across the borough, including the regenerated Bracknell town centre, with the aim of retaining active frontages in specified areas. This has the benefit of retaining retail provision in local areas to help minimise the amount of travelling residents need to undertake to service their daily and longer term needs. Alternative uses can be permitted where viability and feasibility can be demonstrated, including lack of harm on existing retail area. It should be noted that existing permitted development rights could allow some of the uses in the retail areas to be changed without requiring planning permission, so the policy may not be able to be implemented exactly as intended.

LP33 Advertisements and Shop Fronts

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓</p> <p>The policy requires advertisements to have no adverse impact on visual amenity and amenity of the historic environment; new shop fronts are permitted where important architectural or historic features on the existing building are restored and / or retained and not concealed.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>×</p> <p>The policy expands national policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
5	To address the waste hierarchy by: minimising waste as a priority,	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	reuse, then by recycling, composting or energy recovery			
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	<p>✓</p> <p>The policy seeks to manage lighting from new or altered shop fronts; supporting text guides on illuminated advertisements.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Builds upon the national policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	support the sustainable growth of the local economy.			
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	0	0	N/A
12	To protect and enhance human health and wellbeing	0	0	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	<p>✓</p> <p>The policy requires advertisements to have no adverse impact on public safety.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>The policy expands on the national policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	0	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	accessibility, reduce the need for travel by car and shorten the length and duration of journeys			
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	0	0	N/A

Summary:

The policy expands on the national policy in relation to advertisements and shop fronts. It includes consideration of the historic environment and lighting. As such, the effect of the alternative 'no policy' approach would be more potentially negative.

LP34 Protection of Community Facilities and Services

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0	0	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	<p>✓</p> <p>Policy supports the retention, maintenance, improvement of existing facilities (including commercial facilities), and the provision of new facilities and services.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>National policy is less specific in its requirements, reducing the level of protection.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	<p>✓</p> <p>Policy supports the retention, maintenance and improvement of existing education and other facilities (such as community centres) which are often used for more informal or hands-on education and skills, as well as the provision of new facilities.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>National policy is less specific in its requirements, reducing the level of protection.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
11	To meet local housing needs by	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home			
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>Policy supports the retention, maintenance, improvement and provision of new healthcare facilities and chemists, as well as a wide range of facilities and services which support health and wellbeing.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>National policy is less specific in its requirements, reducing the level of protection.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
13	To reduce poverty and social exclusion	<p>✓</p> <p>The protection of community facilities and services aids in preventing social exclusion.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>National policy is less specific in its requirements, reducing the level of protection.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially	<p>✓</p> <p>The protection of community facilities and</p>	<p>x</p> <p>National policy is less specific in</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	cohesive communities	<p>services aids in sustaining vibrant socially cohesive communities.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>its requirements, reducing the level of protection.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>Policy supports the retention, maintenance, improvement and provision of new services and facilities.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>National policy is less specific in its requirements, reducing the level of protection.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The protection of services and facilities reduces the need to travel, which is positive.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>National policy is less specific in its requirements, reducing the level of protection.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
18	To encourage sustainable development by improving efficiency in land use, design and	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	layout. This includes making best use of previously developed land in meeting future development needs.			

Summary:

This policy protects community facilities and services, requiring the retention and maintenance of existing facilities and services; the improvement of the quality and capacity of existing facilities and services; and the provision of new facilities and services. It covers a wide range of facilities and services. It scores positively against many of the SA objectives.

LP35 Protection and Enhancement of the Historic Environment

Alternatives considered (identified within I&O and consulted on):

2. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓ x</p> <p>The level of protection offered to non-designated heritage assets is significantly less than designated assets. Enhancement of such assets is only included for assets identified by the local planning authority (including local listing), and through the supporting text. The section of the policy for non-designated heritage assets does not support their enhancement. The SA Objective does not distinguish between significance of heritage asset.</p> <p>1. Consider re-wording the section on non-designated heritage assets to increase</p>	<p>✓</p> <p>Similar protection without the policy – NPPF covers protection of heritage.</p> <p>Likelihood of effect: Likely</p> <p>Spatial scale: Heritage assets and their setting</p> <p>Temporary/permanent: Permanent</p> <p>Term: Short, medium and long term</p>	<p>✓</p> <p>1. Local listing does not afford any legal protection – buildings (excluding a dwelling house or building next to a dwelling house where prior approval would be required) can still be altered or demolished unless subject to a Building Preservation Notice (BPN). Listed building consent is not required for works to a locally listed building, and</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>level of protection it affords them.</p> <p>2. The policy states:</p> <p><i>“Non-designated heritage assets and their settings including locally, regionally or nationally significant historic buildings, archaeological remains or historic landscapes will be protected from harm.”</i></p> <p>Consider whether possible to get nationally significant non-designated historic buildings.</p> <p>3. The policy states that”<i>unjustifiably harm the significance of non-designated heritage assets and/or settings will not normally be permitted.</i>”</p> <p>Consider removing word “unjustifiably”.</p> <p>Likelihood of effect: Likely Spatial scale: Heritage assets and their setting Temporary/permanent: Permanent Term: Short, medium and long term</p>		<p>permitted development rights continue to apply. As such it would not be effective to require enhancement specifically to non-designated heritage assets. Enhancement is required through other parts of the policy and supporting text.</p> <p>2. The policy has been amended to state “Non-designated heritage assets and their settings including buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, will be protected from harm.”</p> <p>3. The wording in C. Non Designated Heritage Assets has been amended to read “Development proposals that harm the significance of non-designated heritage assets and/or their settings will not normally be permitted”. The policy no longer says “unjustifiably harm”. This is an improvement as increases the protection to non-designated heritage</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
				assets. The description of non-designated heritage assets is now clearer.
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	✓ Flexibility is provided in the policy for the potential for harm to non-heritage assets to be justified, usually where there is public interest. This can have positive effects on the SA Objective as economic growth and regeneration could be justified in areas where a degree of harm occurs to a heritage asset. Likelihood of effect: Potential	✓ National policy requires consideration of the significance of the asset and the impact of a development proposal on the significance i.e. the more important the asset, the greater the weight to be attached to the conservation of the asset. The effect of the policy without the	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>Spatial scale: Mainly in areas with non-designated Heritage assets Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>policy is similar to having the policy. Likelihood of effect: Potential Spatial scale: Mainly in areas with non-designated Heritage assets Temporary/permanent: Permanent Term: Short, medium and long term</p>	
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ By reducing the protection afforded to non-designated heritage assets, it may be able to justify increased housing numbers, for example, which would have positive effects on this policy. Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ Similar effects would be expected as national policy covers this issue too. National policy requires consideration of the significance of the asset and the impact of a development proposal on the significance i.e. the more important the asset, the greater the weight to be attached to the conservation of the asset. The effect of the policy without the policy is similar to having the policy. Likelihood of effect: Possible Spatial scale: Borough</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
			Temporary/permanent: Permanent Term: Short, medium and long term	
12	To protect and enhance human health and wellbeing	0	0	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	0	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	✓ Potentially positive effects as although designated heritage assets are offered high protection, harm to non-designated heritage assets may be justified. This may be of benefit when designing sustainable developments in terms of land use, design and layout.	✓ Similar effects would be expected as national policy covers this issue. National policy requires consideration of the significance of the asset and the impact of a development proposal on the significance i.e. the more	

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>important the asset, the greater the weight to be attached to the conservation of the asset. The effect of the policy without the policy is similar to having the policy</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	

Summary:

The policy expands on the national policy in relation to heritage assets. Strong protection is provided to designated heritage assets. A lower level of protection is offered to non-designated heritage assets, however changes to such assets can fall outside of the planning system.

LP36 Biodiversity

Alternatives considered (identified within I&O and consulted on):

3. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policy supports the protection and enhancement of biodiversity. Where this is areas of green space, it will absorb carbon dioxide, a greenhouse gas.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>National and international policy also supports the protection of biodiversity, however, this policy sets out more details about how this is to be achieved.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The policy supports the retention, protection and enhancement of biodiversity features, some of which will help manage the effects of extreme weather events in these areas, and also in the areas in close proximity.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>National and international policy also supports the protection of biodiversity, however, this policy sets out more details about how this is to be achieved. Where areas of green space are lost, there could be less areas available to absorb some of the effects of extreme weather events.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent:</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
			Permanent Term: Short, medium and long term	
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓ x</p> <p>The policy aims to conserve and enhance biodiversity features where possible.</p> <p>Consider the following amendments to increase positive effects:</p> <ol style="list-style-type: none"> 1) i) Add 'Provide an adequate level of <u>suitable</u> ecological survey information and assessment...' 2) The current river corridor policy is not going to be deleted and not directly replaced. i) Add 'veteran trees, <u>watercourses</u>, protected species...' 3) Add 'Development proposals on or affecting ecological features, non-designated sites or wildlife corridors (<u>including river corridors</u>) will only be permitted...' 4) Add to the end of the Policy 'The Council will secure effective avoidance, mitigation and compensation through the imposition of planning conditions or planning obligations as appropriate, including monitoring for the effectiveness of these measures'. 5) Amend supporting text as follows: Where the impact on the ecological feature cannot be avoided or 	<p>x</p> <p>The policy expands on the national policy in relation to the protection and enhancement of biodiversity.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <ol style="list-style-type: none"> 1) Agreed – the word 'suitable' was added to i). 2) Agreed – the word 'watercourses' was added to i). 3) Agreed – the words 'including river corridors' was added. 4) Agreed – the words 'The Council will secure effective avoidance, mitigation and compensation through the imposition of planning conditions or planning obligations as appropriate, including monitoring for the effectiveness of these measures' were added. 5) Agreed – Added to the supporting text 'Where the impact on the ecological feature cannot be avoided or sufficiently mitigated or there are residual adverse effects after mitigation, as a last resort, the level of impact to be compensated should be calculated using such a metric'. 6) Agreed – amended supporting text as suggested. 7) Agreed – added 'opportunities should be taken to link biodiversity across the wider landscape'. 8) Not agreed – no changes made. Although the primary aim of SANGs are to divert visitors from the SPA, biodiversity

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>sufficiently mitigated or there are residual adverse effects after mitigation, as a last resort, the level of impact to be compensated should be calculated using such a metric.</p> <p>6) Amend supporting text as follows: The Berkshire Biodiversity Strategy identifies priority areas of greatest opportunity.</p> <p>7) End of supporting text - BOAs have a role in linking of biodiversity across the wider landscape, so should the biodiversity network issues be stressed here?</p> <p>8) One of the consultees raised that SANGs should be for recreation only and not biodiversity enhancements. Need some clarity in the policy if the compensation can be delivered in SANGs. Does this vary with the type of habitat required? There is an argument that the two shouldn't be combined, or perhaps not where large amounts of compensation are required? Stringent monitoring would be required to see the effectiveness.</p> <p>9) In some instances, habitats are degraded or removed ahead of planning applications being submitted – add the following to address this issue 'Where the biodiversity of sites has been intentionally removed or degraded (including through neglect), the Council will view the biodiversity value of sites to be as it would likely to have been had the removal or</p>		<p>enhancements are carried out on sites that are to become SANG and these enhancements are managed over time with SANG contributions. Compensation measures could be carried out on existing SANGs if it was shown this was appropriate. SANGs are however well funded for 125 years of management – it might be that there is no opportunity for compensation to be delivered on SANGs – this would need to be established on a case by case basis. No policy amendments are needed at this stage.</p> <p>9) Agreed. Policy wording added and the following text has been added to the supporting text: 'Biodiversity that has been intentionally removed or degraded could include degradation of heathland by doing nothing (and not allowing access for surveys), removal of woodlands prior to submitting planning applications and situations where previous mitigation has not been effective. Areas of plantation that have existed for years on what was originally heathland may however be excluded'.</p> <p>10) Agreed. Added the following to the supporting text: 'Wildlife corridors or ecological networks are important for linking habitats and allowing the movement of species across the landscape. They can include rivers, streams, railways, hedgerows, road verges, trees, incidental pieces of open space and residential gardens.'</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>degradation (including through neglect) not have occurred; effective avoidance, mitigation, compensation and monitoring requirements will be established on this basis'.</p> <p>10) Hedgerows are not currently given much focus, and existing policies EN1 and EN2 will be deleted. They should be covered by this general biodiversity policy. The GI review identifies them as important features linking habitats. Recommend adding 'hedgerows' to the sentence below in the supporting text: 'Wildlife corridors or ecological networks are important for linking habitats and allowing the movement of species across the landscape. They can include rivers, streams, railways, <u>hedgerows</u>, road verges, trees, incidental pieces of open space and residential gardens'.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>		
4	To protect and enhance the Borough's characteristic landscape and its historic environment in	<p>✓</p> <p>This policy will cover some aspects of the Borough's landscape and offer protection to these in accordance with the criteria included in the policy.</p> <p>Likelihood of effect: Likely</p>	<p>✗</p> <p>Without the policy some biodiversity features will be offered less protection. For example, important trees and</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	urban and rural areas	Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	their settings. . Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	efficiency and support the delivery of renewable and low carbon energy			
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by	✓* The policy aims to protect and enhance	* The policy expands on the	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	biodiversity. Development is still possible, however, measures to avoid, mitigate or compensate for any adverse effects will be sought. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	national policy in relation to biodiversity, and details how development can be permitted. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	
12	To protect and enhance human health and wellbeing	✓ The policy supports biodiversity and the protection and enhancement of it. The effects of this is positive for human health and wellbeing. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	✗ Without the policy there could be fewer biodiversity features, which could have a negative effect on human wellbeing, not just plants and animals. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	the fear of crime			
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	0	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future	<p>✓</p> <p>The policy protects biodiversity features from development and seeks enhancement, unless the criteria set out can be met (avoid, mitigate, compensate for negative effects). This should have positive effects when designing developments, as existing biodiversity features can be incorporated into layouts. However, in some cases it could be argued that protection of biodiversity actually hinders effective land use. The</p>	<p>✘</p> <p>The policy expands on the national policy in relation to biodiversity.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	development needs.	<p>policy has criteria to help avoid this scenario occurring.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>		

Summary:

The policy expands on the national policy in relation to biodiversity, including its protection and enhancement. The policy has largely positive effects on the SA Objectives, including on the provision of new homes, although some may consider it to be restrictive. Development can be permitted where the criteria is met, and negative effects on features of biodiversity avoided, mitigated or compensated.

LP37 Designated Nature Conservation and Geological Sites

Alternatives considered (identified within I&O and consulted on):

4. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policy supports the protection of designated conservation sites which absorb carbon dioxide, a greenhouse gas.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>National and international policy also supports the protection of designated nature conservation sites, although this policy is more specific in offering protection to local level sites.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The policy supports the retention, protection and enhancement of designated conservation sites, which will help manage the effects of extreme weather events in these areas, and also in the areas in close proximity.</p> <p>Likelihood of effect: Likely Spatial scale: Nature Conservation Sites and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Areas important for nature conservation may be reduced in size, potentially resulting in less green space able to absorb some of the effects of extreme weather events.</p> <p>Likelihood of effect: Likely Spatial scale: Nature Conservation Sites and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓ x</p> <p>The policy offers different protection to three levels of designated nature conservation and geological sites. Enhancement is included.</p>	<p>x</p> <p>The policy expands on the national policy in relation to how development on or close to designated conservation</p>	<p>✓</p> <p>1) Agreed – change made in the introduction to the</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>Consider following amendments to increase positive effects:</p> <ol style="list-style-type: none"> 1) Add cross reference to the GI policy and SPA policy 2) iii) Given the demand for housing, can stronger wording be used? 3) At the end of the policy, add 'including monitoring for the effectiveness of these measures'. 4) At the end of the supporting text add in appropriate text on monitoring effectiveness of avoidance, mitigation and compensation. <p>Likelihood of effect: Likely Spatial scale: Designated Nature Conservation Sites Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>sites be treated.</p> <p>Likelihood of effect: Likely Spatial scale: Designated Nature Conservation Areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>policy.</p> <p>2) No change made. This reflects the wording in the NPPF.</p> <p>3) Agreed – change made. Added 'including monitoring for the effectiveness of these measures' at the end of the policy.</p> <p>4) Agreed - added 'The developer will be required to submit monitoring data to the Council to show the effectiveness of any planning obligations and conditions'.</p>
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓</p> <p>The policy offers protection to the designated conservation sites, which cover a large percentage of the Borough.</p> <p>Likelihood of effect: Likely Spatial scale: Designated Conservation Sites and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>The policy expands on the national policy in relation to protection of designated conservation sites.</p> <p>Likelihood of effect: Likely Spatial scale: Designated Conservation Sites and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
5	To address the waste	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery			
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	<p>✓</p> <p>Designated nature conservation sites and geological sites are offered varying levels of protection depending upon their status (international, national, local).</p> <p>Likelihood of effect: Likely Spatial scale: Designated conservation sites Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>The policy expands on the national policy in relation to protection of designated conservation sites.</p> <p>Likelihood of effect: Likely Spatial scale: Designated Conservation Sites and surrounding areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.			
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>The policy offers different levels of protection to international, national and locally designated sites. Providing the criteria for each is met, development is not precluded in, or close to, these areas. Housing is more difficult to get approval for in, and around, the SPA areas, to protect the ground nesting bird species.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The policy expands on the national policy in relation to designated conservation sites, and when development will and will not be permitted.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policy supports the protection of designated nature conservation sites which is positive for human health and wellbeing.</p>	<p>x</p> <p>Without the policy there could be fewer areas of designated conservation, many of which are open to the public to utilise for recreational purposes.</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	0	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future	✓ The policy protects designated conservation areas from development, unless specific criteria can be met. As such a large percentage of the Borough is covered with designated conservation sites, a side effect of this policy will be to improve efficiency in	× The policy expands on the national policy in relation to designated conservation sites. Likelihood of effect: Likely	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	development needs.	land use, design and layout to maximise areas of land that can be developed. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	

Summary:

The policy expands on the national policy in relation to the protection of three different levels of designated nature conservation and geological sites. Criteria have been set which protect these areas from adverse effects, whilst potentially permitting development on local level designated sites where effects can be adequately mitigated. Due to the large amount of the Borough covered with designated conservation sites there will inevitably be an effect on the ability to deliver housing on or close to some of these areas.

LP38 Green Infrastructure

A Green Infrastructure Policy was not included within the Issues and Options consultation. The SA identified this omission and recommended a policy be developed. Alternatives considered:

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policy supports the provision of public access networks, providing the opportunity for reduced greenhouse gas emissions through reduced reliance on cars.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Without a specific focus on public access networks, provision of public access may occur, however it is likely to be sporadic and less effective.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The policy supports the protection, enhancement and creation of the Green Infrastructure network, aiding adaptation to climate change by providing a cooling effect to urban areas, flood protection and water catchment (through natural landscapes absorbing water), carbon storage (by plants and soils), and the opportunity for wildlife corridors, offering the potential for species migration in response to climate change.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide</p>	<p>✗</p> <p>Without a specific focus on public access networks, provision of public access may occur, however it is likely to be sporadic and less effective.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Temporary/permanent: Permanent Term: Short, medium and long term		
3	To conserve and enhance the diversity of wildlife, habitats and geology	✓ The policy supports a network of linked habitats, providing corridors and stepping stones for wildlife to move through the landscape, increasing their resilience. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✗ Without the policy the opportunity to improve wildlife corridors is reduced. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	✓ The policy supports the protection, enhancement and creation of the Green Infrastructure network, protecting and enhancing the Borough's characteristic landscape. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✗ Although other policies in the BFLP also cover these issues, it is considered that without the GI policy opportunities to enhance the landscape are reduced. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	pollution and improve the quality of air, water and contaminated land			
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	<p>✓</p> <p>The definition of Green Infrastructure includes productive land; ensuring it is considered within development proposals through the provisions to protect, enhance and create Green Infrastructure.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Although other policies in the BFLP also cover these issues, it is considered that the GI policy will promote better use and also the creation of productive land.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A
10	Develop opportunities for everyone to access a good education and to	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	acquire the skills and knowledge to find work and support the sustainable growth of the local economy.			
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>The policy supports the protection, enhancement and creation of the Green Infrastructure network, which may potentially provide a small reduction in the developable area, reducing the number of homes. However in many instances, provision will be possible through good design within open space, SANG, etc required through other policies. Green Infrastructure provides an opportunity to increase the quality of developments.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Although the amount of housing created is not likely to be reduced without this policy, it is possible that housing will be developed that does not maximise opportunities to enhance the green infrastructure network, thereby reducing the positive effects on this SA Objective.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policy supports the protection, enhancement and creation of the Green Infrastructure network, offering good potential to increase public access, open areas, offering the potential for tranquillity, recreation etc which can enhance human health and</p>	<p>x</p> <p>Without the policy, opportunities to link up often very disconnected areas in the Borough may be missed.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		wellbeing. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	Term: Short, medium and long term	
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	✓ The policy supports the protection, enhancement and creation of the Green Infrastructure network, offering good potential to increase public access, open areas, offering the potential for tranquillity, recreation etc which enhance local distinctiveness and offer the potential for increased social cohesion. Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✗ Without the policy, opportunities to link up often very disconnected areas in the Borough may be missed. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
16	To provide accessible essential services, facilities and infrastructure.	✓ The policy supports the provision of public access networks, providing the opportunity for improved access to essential service, facilities and infrastructure.	✗ Without the policy, opportunities to link up often very disconnected areas in the Borough may be missed. Likelihood of effect: Likely	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The policy supports the provision of public access networks, improving travel choice and accessibility and reducing the need for travel by car.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Without the policy, opportunities to link up often very disconnected areas in the Borough may be missed.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>The policy supports the protection, enhancement and creation of the Green Infrastructure network, taking into account the wider network. This offers the opportunity to improve the layout and design of sites, making the best use of land.</p> <p>Suggested text changes:</p> <ol style="list-style-type: none"> 1. Provide greater introduction to establish what green infrastructure is. 2. Clarify the definition of Green Infrastructure throughout the document to provide clarity and consistency with the Green 	<p>✗</p> <p>The policy clarifies and builds upon the national position in relation to green infrastructure. Without a local policy on green infrastructure, there is potential for it to be overlooked within developments. Most significantly, without the proposed Green Infrastructure Strategy, the wider local <u>network</u> features are less likely to be identified protected and enhanced. As such, the effect of the alternative 'no policy' approach would be more uncertain and potentially negative.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent</p>	<p>✓</p> <p>A Green Infrastructure policy was not originally proposed for inclusion within the Plan; its creation is positive.</p> <ol style="list-style-type: none"> 1. Complete 2. Complete 3. Complete 4. Complete 5. Complete 6. Complete 7. Complete 8. Complete

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>Infrastructure Review; as a minimum add corridors to the definition.</p> <ol style="list-style-type: none"> 3. Clarify financial contributions should only be used within the mitigation hierarchy. 4. Green Infrastructure assets can become multifunctional both when designing new assets and when enhancing existing assets 5. Add into the supporting text the functions that GI can provide 6. Add into the supporting text the opportunities GI can provide 7. Add into the supporting text the link with biodiversity offsetting and OSPV 8. Add into the supporting text a link to, and summary of the findings of the GI review, for context <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Term: Short, medium and long term</p>	

Summary:

The policy follows and expands upon national policy in relation to local circumstances. As such, the effect of the alternative 'no policy' approach (as was originally envisaged) would be more uncertain and likely to be negative. The policy offers strong positive effects in relation to climate adaptation, wildlife and habitats, landscape, human health and wellbeing, accessible services, travel choice and land use. There is potential for the GI requirements to result in a small reduction in the developable area, reducing the number of homes. However in many instances, provision will be possible through good design within open space and SANG provisions (for example) which are already required. Green Infrastructure provides an opportunity to increase the quality of developments for both existing and new residents as well as visitors and employees.

LP39 Thames Basin Heaths Special Protection Area

Alternatives considered (identified within I&O and consulted on):

2. Retain policy CS14 and continue to rely on the retained policy NRM6 from the revoked South East Plan (i.e. do nothing); or
3. Rely solely only on NRM6.

The Preferred Option largely reflects the current policy position (at the time of preparation) based on the retained policy NRM6 and CS14 and associated guidance. Retained policy NRM6 could be revoked by others at any time; this is outside of the control of the Council and would create a policy vacuum in which the Council would not be able to grant planning permissions for housing across large areas of the borough.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>Mitigating the effect of development on the SPA will ensure the protection of SANG land in perpetuity. Indirectly, this will provide a carbon sink (vegetation) in perpetuity, helping to address the causes of climate change.</p> <p>Likelihood of effect: Likely Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓/!</p> <p>Mitigating the effect of development on the SPA will ensure the protection of SANG land in perpetuity. Indirectly, this will provide a carbon sink (vegetation) in perpetuity, helping to address the causes of climate change. This secondary benefit would be at risk of not being achieved if an alternative approach were adopted.</p> <p>Likelihood of effect: Uncertain Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The provision of SANG in perpetuity is likely to aid the adaption to climate change; the extent of the effect will depend on implementation. For example, well connected SANG may allow species movement; land management is likely to allow better infiltration of rainfall to help manage flood risk.</p>	<p>✓/!</p> <p>The provision of SANG in perpetuity is likely to aid the adaption to climate change; the extent of the effect will depend on implementation. For example, well connected SANG may allow species movement; land management is likely to allow better infiltration of rainfall to help manage flood risk. These secondary benefits would be at risk of not being</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change
		<p>Likelihood of effect: Likely Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>achieved if an alternative approach were adopted.</p> <p>Likelihood of effect: Uncertain Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓</p> <p>The preferred policy will have very positive impacts on biodiversity and the protection of a large area of heathland habitat and associated bird species.</p> <p>Clarification is sought on some of the wording within the policy:</p> <ol style="list-style-type: none"> 1. Paras 1 and 2: amend wording 'significant <i>adverse</i> effect' 2. Zone of influence, c: clarify the final sentence to identify what standard will be required within the 5 - 7 km distance. 3. SANG Standards: clause 3.3.3 of the SPA SPD (as at March 2017) requires the provision of SANG in addition to open space requirements. This has not been included in the policy. 4. SANG Standards: clause 3.3.4 of the SPA SPD (as at March 2017) requires the provision of SANG prior to occupation of dwellings. It has only been included within the policy for the 400m-5km zone and for small developments. Without this clause the policy could be 	<p>✗</p> <p>The preferred option, on the whole, brings together the policies currently contained in CS14 and NRM6 and some of the associated guidance.</p> <p>Revoking of NRM6 by others would leave the borough in a policy vacuum in relation to the TBH SPA. It could potentially result in the loss of SANG for not only new developments, but existing SANGs relating to previous developments as well, resulting in harm to the Thames Basin Heaths which are of European importance. Retaining policy CS14 would address this policy vacuum to some extent, however the Core Strategy pre-dates the South East Plan and as such CS14 is not as detailed as NRM6. Neither of the existing policies specifically provides for developments between 5 and 7 kilometres from the SPA boundary; nor do they require developer contributions toward the SAMM Project (for wardening, education and monitoring of effectiveness).</p> <p>Likelihood of effect: Uncertain Spatial scale: TBH affected areas Temporary/permanent: Permanent</p>	<ol style="list-style-type: none"> 1. Change accepted 2. Issue considered, found not to be appropriate. The issue was discussed with Natural England (NE) who has confirmed the standard to be applied is determined on a case by case basis. NE is in agreement that the SPA Policy should not specify exact standards for this zone, however it could be picked up in any subsequent associated guidance, such as a new TBH SPA Supplementary Planning Document (if this were to be developed). 3. The potential to combine SANG requirements with open space provision requirements are currently being discussed in more detail as part of the Play, Open Space and Sports policy. 4. Change accepted. 'Mitigation

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change
		weakened for certain developments. Likelihood of effect: Likely Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term	Term: Short, medium and long term	measures will be delivered prior to occupation and in perpetuity' has now been included for the 5 – 7 km zone.
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	✓ The requirement to provide SANG in perpetuity offers the potential to contribute to a high-quality landscape at a number of sites dispersed across the borough. Likelihood of effect: Likely Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term	✓/! The requirement to provide SANG in perpetuity offers the potential to contribute to a high-quality landscape at a number of sites dispersed across the borough. This secondary benefit would be at risk of not being achieved if an alternative approach were adopted. Likelihood of effect: Uncertain Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	✓ * Mitigating the effect of development on the SPA will facilitate the development of housing in the borough, ultimately increasing emissions to air, land and water. However, SANGs will indirectly	✓/!*/! Mitigating the effect of development on the SPA will facilitate the development of housing in the borough, ultimately increasing emissions to air, land and water. However, SANGs will indirectly	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change
		<p>allow land to provide environmental absorption capacity to help mitigate such impacts.</p> <p>Likelihood of effect: Possible Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>allow land to provide environmental absorption capacity to help mitigate such impacts. However there is a large element of uncertainty if an alternative approach were adopted.</p> <p>Likelihood of effect: Uncertain Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	<p>✓</p> <p>The policy has a secondary positive effect of safeguarding mineral resources beneath the ground.</p> <p>Likelihood of effect: Possible Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓/!</p> <p>The policy has a secondary positive effect of safeguarding mineral resources beneath the ground. This secondary benefit would be at risk of not being achieved if an alternative approach were adopted.</p> <p>Likelihood of effect: Uncertain Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change
	a successful, competitive, and balanced local economy that meets the needs of the area.			
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>The policy and associated Appropriate Assessment facilitate the development of housing, whilst maintaining the integrity of the SPA. There is however a cost implication for developers, which could impact on the affordability of housing and provision of other facilities or infrastructure.</p> <p>Likelihood of effect: Likely Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Revoking of NRM6 by others would leave the borough in a policy vacuum in relation to the TBH SPA. Under the current legislative requirements, this would prevent the Council granting planning permissions for housing, leading to a shortfall in housing.</p> <p>Likelihood of effect: Uncertain Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The requirement to provide SANG offers potential for enhanced human health and well-being through provision of accessible green space, often close to communities.</p>	<p>✓/?</p> <p>The requirement to provide SANG offers potential for enhanced human health and well-being through provision of accessible green space, often close to communities. This secondary benefit would be at risk of</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change
		Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	not being achieved if an alternative approach were adopted. Likelihood of effect: Uncertain Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	✓ The requirement to provide SANG offers the potential for vibrant, locally distinctive and socially cohesive communities. The likelihood of this being achieved increases in larger developments where bespoke SANG is required. Likelihood of effect: Possible Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term	✓/? The requirement to provide SANG offers the potential for vibrant, locally distinctive and socially cohesive communities. The likelihood of this being achieved increases in larger developments where bespoke SANG is required. This secondary benefit would be at risk of not being achieved if an alternative approach were adopted. Likelihood of effect: Uncertain Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term	N/A
16	To provide accessible essential services, facilities and infrastructure.	✓ The requirement to provide SANG offers improved access to recreational facilities which are likely to be accessed -by residents across the borough.	✓/? The requirement to provide SANG offers improved access to recreational facilities which are likely to be accessed -by residents across the borough. This secondary benefit would be at risk of not	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change
		<p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>being achieved if an alternative approach were adopted.</p> <p>Likelihood of effect: Uncertain Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The policy requires developments of 10 net dwellings or more to be within the catchment of a SANG, thus reducing the need for travel and reducing the distance of journeys. Depending on implementation, SANGs also offer the potential to provide non-motorised accessible routes, potentially increasing accessibility and travel choice.</p> <p>Likelihood of effect: Likely Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓/?</p> <p>The policy requires developments of 10 net dwellings or more to be within the catchment of a SANG, thus reducing the need for travel and reducing the distance of journeys. Depending on implementation, SANGs also offer the potential to provide non-motorised accessible routes, potentially increasing accessibility and travel choice. This secondary benefit would be at risk of not being achieved if an alternative approach were adopted.</p> <p>Likelihood of effect: Uncertain Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future	<p>✓</p> <p>The requirement to provide SANG will provide publically accessible open space, aiding tranquillity and fitting with the 'forest' nature of the borough.</p> <p>Likelihood of effect: Likely Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓/?</p> <p>The requirement to provide SANG will provide publically accessible open space, aiding tranquillity and fitting with the 'forest' nature of the borough. This secondary benefit would be at risk of not being achieved if an alternative approach were adopted.</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change
	development needs.		Likelihood of effect: Uncertain Spatial scale: TBH affected areas Temporary/permanent: Permanent Term: Short, medium and long term	

Summary:

The preferred policy reflects the current policy position, with some improvements and clarifications. It will have very positive impacts on biodiversity and the protection of a large area of heathland habitat and associated bird species which are of European importance. Secondary benefits will also be achieved in relation to the causes of climate change, climate adaptation, landscape, minerals, health and wellbeing, communities, facilities, travel and land use. There are, however, cost implications which may reduce housing affordability. The alternative approaches risk the Council not being able to grant planning permissions for housing across a large proportion of the borough; and potentially losing the protection of the heathland and the secondary benefits associated with existing developments if SANG is not protected in perpetuity. This situation would not be permitted as the SPA is protected at European level.

LP40 Flood Risk

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The policy requires development to follow the sequential test accounting for all forms of flooding. Reference to SFRA to ensure local risks are taken into account.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The policy ensures the local flood risk identified in the Level 1 SFRA is accounted for in developments. National policy focusses on fluvial flooding, rather than all sources of flooding which are more significant locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0	0	N/A
5	To address the waste hierarchy	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery			
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by	✓ x	x	✓

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>The policy requires all forms of flooding to be taken into account, improving the quality of homes.</p> <p>Recommendation: Clarify position of traveller sites within the policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>National policy focusses on fluvial flooding, rather than all sources of flooding which are more significant locally. This may result in lower quality homes.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Text added:</p> <p>The above policy and Policy 41: SuDS should be read in conjunction with Policy 26: Travelling Populations. National policy sets out that sites for travelling populations should not be located in areas at high risk of flooding (including functional floodplains), given the particular vulnerability of caravans.</p>
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The impact on flooding has a significant effect on health and wellbeing of residents. Flood risk is taken into account through the policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>The policy ensures the local flood risk identified in the Level 1 SFRA is accounted for in developments. National policy focusses on fluvial flooding, rather than all sources of flooding which are more significant locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	0	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	<p>✓ x</p> <p>Clarity is needed as to the extent of the policy in relation to infrastructure.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	0	<p>✓</p> <p>Clarity is needed as to the extent of the policy in relation to infrastructure</p>
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>The use of the sequential test will help to promote development and land use, whilst also ensuring flood risk is accounted for.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>The policy ensures the local flood risk identified in the Level 1 SFRA is accounted for in developments. National policy focusses on fluvial flooding, rather than all sources of flooding which are more significant locally.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

Summary:

The policy expands on the national policy in relation to flood risk, using the SFRA to define how it is to be applied locally helping to guide where development can take place. The effect of the alternative 'no policy' approach would be more negative, with development not accounting for flood risk from all sources of flooding.

LP41 Sustainable Drainage Systems

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	0	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The policy provides a requirement to mitigate the flood risk impacts on the lifetime of a development. Inclusion of on-going maintenance secured by legal agreement is welcome.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>The known flood risk in the borough will limit potential development. This policy seeks to provide means to mitigate impacts and open development and will make a positive impact.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓ ✗</p> <p>SuDS provision has an alignment with habitat management with existing water run-off in fluvial areas likely to host a variety of wildlife. Inclusion of SuDS may impact upon this habitat and will need to be carefully managed. Reference to Green Infrastructure and SANGS is made.</p> <p>Consideration: Include a threshold below which inclusion of this requirement is not necessary.</p>	<p>✗</p> <p>The known flood risk in the borough will limit potential development. This policy seeks to provide means to mitigate impacts and open development and will make a positive impact on habitats if carefully managed.</p> <p>Likelihood of effect: Likely Spatial scale: Fluvial locations Temporary/permanent:</p>	<p>✓</p> <p>Major Development thresholds have been introduced into the policy. The effects are now considered to be positive.</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Likelihood of effect: Likely Spatial scale: Fluvial locations Temporary/permanent: Permanent Term: Short, medium and long term	Permanent Term: Short, medium and long term	
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0	0	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	✓ x The policy seeks to improve water quality in accordance with the Thames River Basin Management Plan. There is little information in the supporting text to detail what solutions would be acceptable. The provision of SuDS can contribute to improve surface water and groundwater quality. Consideration: 1) Inclusion of additional text in the Supporting text to define what would be acceptable as a 'sufficient water quality improvement'. 2) Include a threshold below which inclusion of this requirement is not necessary.	x The known flood risk in the borough will limit potential development. This policy seeks to provide means to mitigate impacts and open development and will make a positive impact on water quality. Likelihood of effect: Likely Spatial scale: Fluvial locations Temporary/permanent: Permanent Term: Short, medium and long term	✓ 1) Supporting text provides more information and states that it needs to be sufficient to mitigate the impact of the development, and aim towards greenfield runoff rates. 2) Major development thresholds have been introduced in the policy. This policy now has positive effects on the SA Objective.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term		
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and	✓ Careful management of flood risk areas will open significant land to additional development, potentially identified as more	* The known flood risk in the borough will limit potential development. This policy seeks to	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	affordable home	affordable given the location. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	provide means to mitigate impacts and open development and will make a positive impact on meeting local housing needs. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	
12	To protect and enhance human health and wellbeing	✓ The impact on flooding has a significant effect on health and wellbeing of residents. Means to reduce this in developments during the life through well managed SuDS activities are included in the policy. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	* The known flood risk in the borough will limit potential development. This policy seeks to provide means to mitigate impacts and open development and will make a positive impact on health and wellbeing of residents affected by flooding. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	cohesive communities			
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>Careful management of flood risk areas will open significant land to additional development, potentially identified as more affordable given the location.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>The known flood risk in the borough will limit potential development. This policy seeks to provide means to mitigate impacts and open development and will make a positive impact on meeting local housing needs.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

Summary:

The policy provides the local context to enable development in flood risk areas through the use of effective SuDS technologies and approaches. It requires all new development in areas at risk of flooding to give priority to the use of SuDS and all major developments to incorporate SuDS unless it can be demonstrated that provision on site is inappropriate. Without this policy, development would be more limited and may take place without the correct mitigation measures. The policy is positive and provides a requirement for on-going maintenance secured by legal agreement over the lifetime of the development.

LP42 Addressing Climate Change through Renewable Energy and Sustainable Construction

Alternatives considered (identified within I&O and consulted on):

4. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓ x</p> <p>The policy promotes the inclusion of low carbon and renewable energy provision to reduce energy and CO2. By applying 'at least' BREEAM very good in the policy, it provides the opportunity to build on the minimum standards set out in Part L. However, the tight definition around technologies to achieve 'very good' does not account for improvements in fabric above Part L. The BREEAM very good rating is an industry standard and provides little additional benefit.</p> <p><u>Recommendations:</u></p> <ol style="list-style-type: none"> 1. Consideration should be given to the inclusion of a % target in the first bullet when requesting a proportion of energy from decentralised low carbon or renewable sources. 2. Either the BREEAM rating should be increased, or the policy requirement for a BREEAM rating removed or replaced. BREEAM can apply to both residential and non-residential and covers a range of issues, such as energy, water use, pollution, etc. that produce an overall BREEAM Level. An alternative is Passivhaus, which focuses on energy performance / 	<p>x</p> <p>The policy will seek to reduce energy and CO2 emissions. Without the policy, there would be no scope to encourage the use of appropriate technologies.</p> <p>Likelihood of effect: Likely</p> <p>Spatial scale: Borough wide</p> <p>Temporary/permanent: Permanent</p> <p>Term: Short, medium and long term</p>	<ol style="list-style-type: none"> 1. Planning response: an evidence base would be needed to request a specific percentage. <p>SA response: The Zero Carbon Hub provides an evidence base supporting a minimum of 10% renewable energy or decentralised low carbon, showing that it is cost effective to incorporate.</p> <p>Planning response: The Zero Carbon Hub ceased operation in March 2016, following the Government's decision not to take zero carbon housing forward. From what remains on their website, justification for the 10% is not apparent. NPPG (Renewable and Low Carbon Energy paragraph 3) states that when drawing up a Local Plan, LPAs should first consider what the potential is for renewable and low carbon energy generation. In doing so there</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>efficiency and also covers overheating issues. Whilst Passivhaus applies to both residential and non-residential developments, it is appreciated that Government guidance does not allow any mandatory improvement on Building Regulations for residential schemes. Passivhaus could, however, be requested for non-residential schemes. Consider requesting BREEAM 'excellent' for commercial (if not pursuing Passivhaus). The BRE have produced information about the minimal impact of achieving 'excellent' and the cost/benefits of this.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>		<p>are issues to consider. It states that whilst LPAs should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver.</p> <p>As the NPPG does not provide a quota/site threshold for securing renewable / low carbon development and we do not have recent evidence. The current Sustainable Resources SPD was produced in 2008 and supports the Core Strategy. This suggests a new study is required.</p> <p>2. Planning response: Building Regulations set out the minimum performance with regards to energy efficiency. The policy has been amended to make it clear that 'at least BREEAM very good or equivalent standard' is required. The supporting text now states 'Building Regulations set out the minimum performance required with regards to</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
				<p>energy performance, efficiency and target emission rates. The application of BREEAM provides the opportunity to build on these mandatory standards'. Application of more stringent standards is generally limited by government policy; with legal considerations required. The need for more stringent requirements for residential schemes would need to be established and viability demonstrated. For non-residential schemes, the viability of increased standards, and attractiveness of the borough for businesses, must be considered.</p> <p>SA response: Overall ✓* assessment remains due to the need for further evidence.</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓</p> <p>The inclusion of a water efficiency level for residential development is necessary given the water stress rating of the area. This more stringent requirement is supported by evidence within the Water Cycle Study. The policy includes requirements on sustainable construction and water efficiency to promote adaptation.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✘</p> <p>No policy would seriously impact upon water provision in the Borough.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>✓ x</p> <p>For non-residential development, water efficiency is covered within the overall BREAAAM assessment, although this also covers a wide range of other sustainability issues.</p> <p>The policy does not address wider adaptation to climate change.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 1. Consider adding into the policy requirement for assessment of how the development will cope with potential future adaptation requirements based on the UK Climate Infrastructure Programme (CIP). 2. Refer also to comments (and response) above relating to BREEAM under SA1. <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>		<ol style="list-style-type: none"> 1. Planning response: Looking at future adaptations is a positive step but we would be setting out a “guestimate” of what the future requirements might be. The supporting text to the policy notes the Permitted Development rights that exist for energy saving or renewable additions to existing development. The CIP website contains useful guidance on a number of areas including sustainable construction, flood risk and retro fitting, etc. We have the option to refer to this type of guidance in any updates to SPDs that we produce. On a broader level, the Council’s “Climate Change Action Plan” (2016 update) also sets out useful actions that can be taken forward. 2. Refer also to comments (and response) above relating to BREEAM under SA1. <p>SA response: Overall ✓ x assessment remains due to the need for further evidence and a new SPD is not yet available to assess.</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0	0	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	<p>✓</p> <p>The policy promotes the inclusion of low carbon and renewable energy provision to reduce energy and CO2. It also requires the more stringent water efficiency standard within this water stressed area; the application of BREEAM provides an opportunity to seek a complementary approach to water resources for non-residential developments.</p>	<p>✗</p> <p>The policy will seek to reduce energy and CO2 emissions and water stress. Without the policy, there would be no scope to encourage the use of appropriate technologies.</p>	

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>✓ x</p> <p>However the policy could go further to include a target of 10% minimum renewable sources or decentralised low carbon to increase its positive effect on this SA Objective.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	See discussion above under SA1.
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	<p>✓ x</p> <p>Refer to comments above under SA1.</p>	<p>x</p> <p>The policy will seek to reduce energy and CO2 emissions. Without the policy, there would be no scope to encourage the use of appropriate technologies.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	Refer to response above under SA1.
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	balanced local economy that meets the needs of the area.			
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	0	0	N/A
12	To protect and enhance human health and wellbeing	0	0	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	0	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>The Policy provides for development to meet a proportion of energy from decentralised or renewable sources. Supporting text identifies that new housing or commercial development provides the opportunity to integrate within the design process a proportion of the proposed development's energy requirements from these sources. Potentially this offers efficiency in land use, design and layout.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>The policy builds on national guidance.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

Summary:

The policy expands on the national policy in relation renewable energy and sustainable construction. National Policy allows for water efficiency and energy/ carbon targets to be set at a local level. Without this application – a no policy approach – the impact would affect water provision and climate change targets. The provision of a BREEAM very good rating is industry standard and provides little additional benefit. Consideration to raising the policy should be given.

LP43 Pollution and Hazards

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The policy promotes the reduction of pollutants and emissions including from vehicles. This will be through both reducing the need to travel and also enabling shorter journey times.</p> <p>Likelihood of effect: Possible Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Air pollution is a contributory impact on climate change. The policy seeks to reduce the level of pollution arising from new development, which will provide a positive impact</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓</p> <p>The policy will reduce the impacts on wildlife and habitats from noise, light pollution and air pollution. In particular, impacts on sensitive location require an assessment.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide</p>	<p>✗</p> <p>Pollution impact has a negative impact on wildlife and habitats. Specific local reference to noise and air quality impacts are necessary to provide the required mitigation.</p> <p>Likelihood of effect: Likely</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Temporary/permanent: Permanent Term: Short, medium and long term	Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	✓ The policy will reduce the impacts on the Borough's character from noise, light pollution and air pollution. In particular, impacts on sensitive location require an assessment. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	x Pollution impact has a negative impact on the landscape. Specific local reference to noise and air quality impacts are necessary to provide the required mitigation. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	✓ x The policy will reduce the impacts from noise, light pollution and air pollution. In particular, impacts on sensitive location require an assessment. Contaminated land is dealt with under a separate policy. Whilst water pollution and quality will be included within the generic terms of the policy wording, the supporting text is silent on water pollution and water quality.	x Pollution impact has a negative impact on development. Specific local reference to noise and air quality impacts are necessary to provide the required mitigation.	✓ Response: Water quality information added to the supporting text; and development proposals should seek to improve the quality of controlled waters, with examples of how this may be applied.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>Recommend adding specific reference to water quality to the supporting text, particularly given the requirements of the Water Framework Directive.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>		
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓</p> <p>The policy will reduce the impacts on housing development from noise, light pollution and air pollution.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Pollution impact has a negative impact on the provision of quality housing. Specific local references to noise and air quality impacts are necessary to provide the required mitigation.</p>	N/A
12	To protect and enhance human health and wellbeing	<p>✓ ✗</p> <p>The policy will reduce the impacts on human health and wellbeing from noise, light pollution and air pollution. In particular, lighting and noise pollution impacts are considered.</p> <p>This SA Objective may be adversely effected by a comment in the supporting text of the policy that states it may only be appropriate to consider the impact of the final use for vibration impacts (rather than the construction phase too). Consider removing this as vibration should be considered in both phases.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Pollution impact has a negative impact on human health and wellbeing. Specific local references to noise and air quality impacts are necessary to provide the required mitigation.</p>	<p>✓</p> <p>Agreed: this sentence has now been removed and the following added 'Applicants may be required to submit a working method statement compliant with BS 5228-1:1997 – Noise and vibration control on construction and open sites'.</p>
13	To reduce poverty and social exclusion	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	0	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The policy will reduce the impact from air pollution related to travel. Key air pollution zones are highlighted.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Pollution impact has a negative impact on development. Specific local references to noise and air quality impacts are necessary to provide the required mitigation.</p>	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>The reduction of pollution impacts will help to mitigate against the impacts on human health and habitats in particular.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Pollution impact has a negative impact on development. Specific local reference to environmental impacts have been noted to provide the required mitigation</p>	N/A

Summary:

The policy applies the local environmental pollution impacts covering artificial light, noise, air and water pollution and its impacts to habitats and human health. Without this local detail, applications for developments would be made without regard to pollution mitigation within sensitive areas. As such, the effect of the alternative 'no policy' approach would be potentially negative. In line with national policy, these significant benefits could potentially be to the detriment of the ability to meet housing need; however developments are more likely to be sustainable

LP44 Development of Land Potentially affected by Contamination

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>Potential positive effect to greenhouse gas emissions through remediation of contaminated sites.</p> <p>Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	0	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓</p> <p>Mainly positive effects, although 'enhancement' of wildlife, habitats and geology is not mentioned. However, other policies (such as Biodiversity) do cover enhancement, and would be relevant.</p> <p>Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Other policies offer sites protection from contamination.</p> <p>Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
4	To protect and enhance the Borough's characteristic	✓	×	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	landscape and its historic environment in urban and rural areas	<p>Positive effects as it is enabling development on previously developed land, helping to reduce pressure to develop greenfield land and alter the landscape.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Without the policy, land which is contaminated may not be remediated and redeveloped. Potentially increasing need to develop of greenfield sites.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	<p>✓ x</p> <p>Mainly positive effects as any contamination will need to be remediated to a level suitable for the end use and to ensure sensitive receptors are not affected.</p> <ol style="list-style-type: none"> Specify the name of the 'Pollution and Hazards' policy in the introduction. Source Protection Zone (SPZ) – mention in policy as sensitive receptor. Potential conflict – policy refers to 'no harm' initially followed by lesser protection in 'no unacceptable harm or adverse impacts to the environment'. Tighten wording. Clarify meaning of sentence 'development proposals will not be supported where it would lead to future 	<p>✓ x</p> <p>Although other policies will address some of these issues under some scenarios (e.g. protection of important wildlife sites), the proposed policy offers stronger protection.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <ol style="list-style-type: none"> Agreed - Completed. Agreed - Footnote added within the policy and SPZ added as potential receptor. Wording amended to state 'will be supported where it can be demonstrated that they will not expose people, the natural environment, property, water bodies or other receptors to levels of potential contamination which give rise to unacceptable risks or harm to health or other

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>contamination of land'.</p> <p>5. 'for the purposes of landfill sites, 'near a site' is within 250m.' Shouldn't it depend upon what is identified and whether there is a potential source/pathway linkage?</p> <p>6. 'If potential contamination is found, a Phase 2 assessment will be required.' Clarify wording.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>		<p>adverse impacts'.</p> <p>Further SA comment: Consider removing the word 'unacceptable' as changes meaning and emphasis of policy slightly, and could offer less protection from contamination.</p> <p>Planning response: The UK contaminated land regime adopts a risk based approach as risk exists at many levels; as such it is appropriate to leave in the word 'unacceptable'.</p> <p>SA response: Agreed.</p> <p>4. Amended to 'development proposals will not be supported where they would spread existing contamination, or cause contamination of land'.</p> <p>5. Text amended to 'for the purposes of this policy, 'near a site' is usually within 250m, but may be dependent upon the potential contamination identified.'</p> <p>6. Amended to 'If the potential for contamination is identified a Phase 2 assessment will also need to accompany the planning</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
				application'.
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>Positive – enabling previously used land to be redeveloped, and provides requirements for human health to be protected.</p> <p>Consider increasing protection through tightening word 'unacceptable'?</p> <p>Likelihood of effect: Likely</p>	<p>✓ x</p> <p>Requirements regarding remediation of contaminated land are contained in alternative legislation.</p> <p>Likelihood of effect: Likely</p> <p>Spatial scale: Borough</p> <p>Temporary/permanent:</p>	<p>✓</p> <p>See discussion under SA6, item 3 above.</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	Permanent Term: Short, medium and long term	
12	To protect and enhance human health and wellbeing	✓ x Generally positive effects as areas of contaminated land will be remediated, reducing potential risks to human health. Consider tightening word 'unacceptable' and also include potential to 'enhance' human health. Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	✓ x Similar effects to those with the policy. Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	✓ See discussion under SA6, item 3 above. Regarding the potential to include 'enhance' human health: a change of policy wording is not considered necessary as identifying, assessing and reducing the risk to human health from contamination will inherently result in enhanced human health.
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	✓ Enabling previously used sites to be redeveloped and reused, more positive than sites remaining derelict and underused Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	✓ Similar effects as there is an emphasis at national level to redevelop sites which have previously been used. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent:	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
			Permanent Term: Short, medium and long term	
16	To provide accessible essential services, facilities and infrastructure.	0	0	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	0	0	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>Positive effects as the process by which potentially contaminated land is identified and subsequently treated is set out in the policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The process by which potentially contaminated land should be identified would not be clearly set out – reliance on national guidance.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	

Summary:

The policy expands upon national guidance regarding identification and remediation of contaminated land, thus enabling previously developed sites to be redeveloped. This created strong positive effects when compared to several of the SA Objectives and should help to facilitate more sustainable development

Transport Policies: LP45 Strategic Transport Principles; LP46 Assessing, Minimising and Mitigating the Transport Impacts of Development; LP47 Transport Infrastructure Provision; and LP48 Travel Plans.

The suite of transport policies were assessed as a whole. Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The suite of policies support sustainable modes of transport, improved travel choice, transport solutions that reduce greenhouse gases, accessible public transport etc. Together these measures reduce the need to travel and the emission of greenhouse gases from travel.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Whilst bespoke policies on climate change, spatial strategy etc are part of the LP, the effect would be less positive without specific transport policies, particularly given the significance of transport in terms of greenhouse gas emissions.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓ x</p> <p>Flood risk from 'development proposals' (which will include transport development proposals) are covered within the Flood Risk policy. This includes all sources of flooding.</p> <p>Suggest clarifying that flood risk will not be increased in other areas as a result of transportation developments.</p>	0	<p>✓</p> <p>Supporting text for Flood Risk policy now reads:</p> <p>The design of individual buildings and the overall design of a development site can do much to reduce the risk of flooding and make the development safe for its users over the lifetime of the building, flood resistant/resilient and not</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
				increase flood risk overall. This includes not increasing flood risk off site and elsewhere, for example, not impacting adversely on the road network and other forms of transport infrastructure.
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>x</p> <p>Increased development will ultimately result in increased emissions to air through transport, with the potential effects to ecology, in particular within the SPA and SAC. Whilst the suite of transport policies work to reduce the overall effect, increased emissions are inevitable. The policy remains silent on air quality.</p> <p>Recommendation: Address potential air quality effect from increased travel, either within this suite of policies, or those relating to pollution of the SPA and SAC.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Legislation requires Habitat Regulations Assessment in relation to the SPA and SAC; this can include the effects of air quality. Other areas of biodiversity value receive less protection. National planning guidance establishes requirements for consideration of air quality within planning applications.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Amendment made to the Pollution and Hazards Policy. The supporting text now includes: 'Pollution that affects air quality can also impact upon biodiversity and protected habitats, such as Special Protection Areas and Special Areas of Conservation. A precautionary approach will be taken to such areas to ensure they are not subject to adverse harm. Applicants will be required to undertake air quality modelling and assessment where necessary to address the effects on human health and biodiversity. This will be provided or funded by the applicant.'</p> <p>This is considered appropriate.</p> <p>This topic area is currently</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
				developing following the recent High Court judgement regarding Wealden District Council.
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	0 Covered under the term 'development proposals' within the Landscape Character and Strategic Gaps policy.	0	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	<p>x</p> <p>Increased development will ultimately result in increased emissions to air through transport, with the potential effects to ecology and human health. Whilst the suite of transport policies work to reduce the overall effect, increased emissions are inevitable. The policy remains silent on air quality. The policies require development proposals to assess, minimise and mitigate adverse transport impacts; indirectly this reduces the potential effect on air quality (and subsequently human health and biodiversity).</p> <p>Recommendation: Address potential air quality effect from increased travel, either within this suite of</p>	<p>✓ x</p> <p>National policy sets requirements on local authorities relating to air quality; national planning guidance establishes requirements for consideration of air quality within planning applications.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Amendment made to the Pollution and Hazards Policy. The supporting text now includes: 'Applicants will be required to undertake air quality modelling and assessment where necessary to address the effects on human health and biodiversity. This will be provided or funded by the applicant.'</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>policies, or those relating to pollution.</p> <p>Other forms of pollution are dealt with in the Pollution and Hazards policy, and the Development of Land Potentially Affected by Contamination policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>		
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	<p>✓</p> <p>The transport policies support developments that reduce the need to travel; and offer a choice of modes of travel with minimal reliance on the private car. These measures, collectively with other requirements of the LP, are likely to reduce the use of natural resources (on a per capita basis).</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓*</p> <p>Whilst bespoke policies on climate change, spatial strategy etc are part of the LP, the effect would be less positive without specific transport policies, particularly given the significance of transport in terms of resource use.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment	<p>✓</p> <p>Support for sustainable modes of transport,</p>	<p>✓</p> <p>Bespoke Policies on these issues</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	and efficient transport network, aid economic activity. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	are included in the BFLP. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	✓ Support for sustainable modes of transport, and efficient transport network, aid access to education. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	✓ Bespoke Policies on these issues are included in the BFLP. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	0	0	N/A
12	To protect and enhance human health and wellbeing	✗ Increased development will ultimately result in increased emissions to air through transport, with the potential effects to human health. Whilst the suite of transport policies work to reduce the overall effect, increased emissions are inevitable. The policy remains silent on air quality.	✓ ✗ National policy sets requirements on local authorities relating to air quality; national planning guidance establishes requirements for consideration of air quality within planning applications.	✓ Amendment made to the Pollution and Hazards Policy. The supporting text now includes: 'Applicants will be required to undertake air quality modelling and assessment where necessary

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>Recommendation: Address potential air quality effect from increased travel, either within this suite of policies, or those relating to pollution.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	to address the effects on human health and biodiversity. This will be provided or funded by the applicant.'
13	To reduce poverty and social exclusion	<p>✓</p> <p>The transport policies support developments that reduce the need to travel; and offer a choice of modes of travel with minimal reliance on the private car. These measures, collectively with other requirements of the LP, are likely to reduce poverty and social exclusion.</p> <p>Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>Collectively, other policies within the plan support a reduction in poverty and social exclusion. However this may be less positive than with the suite of transport policies in place.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
14	To reduce and prevent crime and the fear of crime	<p>0</p> <p>Covered within Design policy.</p>	0	N/A
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>✓</p> <p>The transport policies support developments that reduce the need to</p>	<p>✓*</p> <p>Without the policy in place, the</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>travel; and offer a choice of modes of travel with minimal reliance on the private car. These measures, collectively with other requirements of the LP, are likely to create and sustain vibrant and locally distinctive and socially cohesive communities.</p> <p>Likelihood of effect: Possible Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>effect is likely to be less positive.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>The transport policies support developments that reduce the need to travel; and offer a choice of modes of travel with minimal reliance on the private car. These measures, collectively with other requirements of the LP, are likely to provide accessible essential services, facilities and infrastructure.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>Without the policy in place, the effect is likely to be less positive.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The transport policies support developments that reduce the need to travel; and offer a choice of modes of travel with minimal reliance on the private car.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide</p>	<p>✓ x</p> <p>Effects of national policy locally are less certain.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long</p>	

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Temporary/permanent: Permanent Term: Short, medium and long term	term	
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	✓ The transport policies includes for safeguarding routes/land necessary to provide infrastructure for highway capacity or increased transport choice. By supporting reduced travel need and increased transport choice, more sustainable locations for development are supported. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✗ Without the safeguarding of routes/land, infrastructure may not be able to be provided resulting in less sustainable development. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	

Summary:

The suite of transport policies supports developments that reduce the need to travel; offer a choice of modes of travel with minimal reliance on the private car; and assess, minimise and mitigate adverse transport impacts. Increased development will ultimately result in increased emissions to air, with potential effects to biodiversity and human health (air quality assessments are considered within the Pollution and Hazards policy). Whilst the suite of transport policies work to reduce the effect, increased emissions to atmosphere overall are inevitable.

LP49 Parking

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓ x</p> <p>The policy supports the provision of parking for vehicles, cycles and electric vehicle charging facilities in line with current standards (set out in the Parking SPD); justification is required for not meeting the standards, including the provision of sustainable transport modes. Whilst the provision of cycle parking and (to some extent) electric vehicle charging points help reduce emissions of greenhouse gases, provision of parking to a relatively high standard, may encourage further use of vehicles.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The Parking SPD sets out the standards for parking within developments. Similar affect to policy position.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	0	0	N/A
3	To conserve and enhance the diversity of wildlife, habitats and geology	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓ x</p> <p>Potential exists for parking standards to result in the over-dominance of car parking to the detriment of the street scene, including the ability to include meaningful landscaping. However, the standards do require effective parking solutions to be considered at the design stage.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The Parking SPD sets out the standards for parking within developments. Similar affect to policy position.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water and contaminated land	0	0	N/A
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.			
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	<p>✓ x</p> <p>Parking standards have the potential to require more land, thus lowering densities of development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ x</p> <p>The Parking SPD sets out the standards for parking within developments. Similar affect to policy position.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
12	To protect and enhance human health and wellbeing	0	0	N/A
13	To reduce poverty and social exclusion	0	0	N/A
14	To reduce and prevent crime and the fear of crime	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	0	0	N/A
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>The parking policy supports the provision of parking infrastructure, both within developments and in town centres.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>The Parking SPD sets out the standards for parking within developments. Similar affect to policy position.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>The policy support vehicle parking, cycle parking, disabled parking facilities and electric vehicle charging facilities. Vehicle parking standards may be relaxed where sustainable modes of transport are available.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>The Parking SPD sets out the standards for parking within developments. Similar affect to policy position.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land	<p>✓*</p> <p>Having a parking policy requires effective parking solutions to be considered at the design stage; however they may result in</p>	<p>✓*</p> <p>The Parking SPD sets out the standards for parking within developments. Similar affect to</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	in meeting future development needs.	<p>more land being required for development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>policy position.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	

Summary:

The parking policy continues to implement the existing Parking SPD. There is a natural conflict between the promotion of sustainable modes of transport, and the need to recognise that cars still play a vital role in many people's lives. The policy requires parking to be considered at the design stage (which is positive); however there are potential conflicts with the amount of land required for parking and its effect on the street scene.

LP50 Play, Open Space and Sports Provision

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The provision of green open space will have a positive effect on this SA objective.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>The effect of several other policies will also have a benefit effect on this SA Objective, potentially the Climate Change policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓ x</p> <p>The provision of green open space will increase capacity for surface water infiltration. Construction of areas of hardstanding, sports pitches, paths etc, should be able to withstand extremes of heat.</p> <p>Recommendation: consider including reference to ensuring new facilities can withstand extremes of heat and other predictable side-effects of climate change.</p> <p>Likelihood of effect: Likely Spatial scale: Open Spaces Temporary/permanent: Permanent</p>	<p>x</p> <p>Potentially negative as less open space may be created, resulting in less areas available to help minimise flood risk.</p> <p>Likelihood of effect: Likely Spatial scale: Open Spaces Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>The following text was added to the supporting text: In addition to its primary function, open space also contributes to cooling the urban environment. Any facilities provided on OSPV should also be designed to withstand extremes in weather conditions or heat and other foreseeable effects of climate change.</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Term: Short, medium and long term		
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓</p> <p>The provision of enhanced or new passive open space of public value will provide improved or increased amount of wildlife and habitat.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Potentially negative as less passive open space of public value may be created, resulting in less habitat or opportunities to encourage wildlife</p> <p>Likelihood of effect: Likely Spatial scale: Open Spaces Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓</p> <p>The provision of open space and areas of play is positive as they provide for example, more green spaces for people to enjoy which adds to the existing legacy of the new Town.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Potentially negative as less open space may be created, resulting in greater effect on landscape.</p> <p>Likelihood of effect: Likely Spatial scale: Open Spaces Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and	?	<p>✓</p> <p>The Pollution Policy would seek to</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	improve the quality of air, water and contaminated land	<p>There is the potential for light and noise to be created from use of open spaces, especially sports pitches. This would be covered by the Pollution Policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>avoid adverse effects on this SA Objective.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
11	To meet local housing needs by ensuring that everyone has the opportunity to live in a high quality, well designed and affordable home	0	0	N/A
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policy supports the provision of all types of open space and sports facilities in accordance with the need generated by a development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Less open space, sports facilities and play spaces may be created. Less potential for increased connectivity may be realised too.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
13	To reduce poverty and social exclusion	<p>✓</p> <p>The provision of open space and play areas will be available for use by all.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Less open space, sports facilities and play spaces may be created. Less potential for increased connectivity may be realised too.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
14	To reduce and prevent crime and the fear of crime	<p>✓✗</p> <p>Consider including requirement to create safe and secure environments in the design</p>	0	<p>✓</p> <p>The following text was added to the supporting text: OSPV</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		<p>of spaces and infrastructure.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>		<p>should also be designed create safe and secure environments such as ensuring they are lit (where appropriate) and allow good surveillance. These matters should be considered in tandem with other policies in the Local Plan.</p>
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	<p>✓</p> <p>Provision of open space, play and sports facilities is considered to be positive.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Less open space, sports facilities and play spaces may be created. Less potential for increased connectivity may be realised too.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
16	To provide accessible essential services, facilities and infrastructure.	<p>✓</p> <p>The delivery of open space, play and sports provision will have a positive effect on this SA Objective. Improving connectivity between sites is also considered to be positive.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Less open space, sports facilities and play spaces may be created. Less potential for increased connectivity may be realised too.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
17	To improve travel choice and accessibility, reduce the need for travel by car and shorten the length and duration of journeys	<p>✓</p> <p>Improved connectivity between sites should help reduce the need to drive to open spaces and other facilities which is positive.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Less open space, sports facilities and play spaces may be created in sustainable, easily accessible locations. Less potential for increased connectivity may be realised too.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>Improving connectivity between sites is positive as is provision of accessible open space.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Less potential for increased connectivity between sites, and less accessible open space.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A

Summary:

The policy requires that all development contribute towards open space, play areas and sports provision, where appropriate and where there is a need. Overall it is considered that this policy has positive effects on the SA Objectives. The creation of accessible linkages between open spaces is also positive.

LP51 Standards for Open Space of Public Value

Alternatives considered (identified within I&O and consulted on):

1. No policy. Assess each application on a case by case basis, using national guidance.

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
1	To address the causes of climate change through reducing emissions of greenhouse gases	<p>✓</p> <p>The provision of green open space will have a positive effect on this SA objective.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>The effect of several other policies will also have a benefit effect on this SA Objective, particularly the Climate Change policy.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
2	Adapt to climate change by preparing for extreme weather events, including avoiding and managing the risk of flooding, heat wave, drought and storm damage.	<p>✓ x</p> <p>The provision of green open space will increase capacity for surface water infiltration. Construction of areas of hardstanding, sports pitches, paths etc, should be able to withstand extremes of heat.</p> <p>Recommendation: consider including reference to ensuring new facilities can withstand extremes of heat and other predictable side-effects of climate change.</p> <p>Likelihood of effect: Likely Spatial scale: Open Spaces Temporary/permanent: Permanent</p>	<p>✓ x</p> <p>Government policy and other policies in the BFLP will cover some of these issues.</p> <p>Likelihood of effect: Likely Spatial scale: Open Spaces Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓</p> <p>The following text was added to the supporting text of POSS Policy 1: In addition to its primary function, open space also contributes to cooling the urban environment. Any facilities provided on OSPV should also be designed to withstand extremes in weather conditions or heat and other foreseeable effects of climate change.</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Term: Short, medium and long term		
3	To conserve and enhance the diversity of wildlife, habitats and geology	<p>✓</p> <p>The provision of passive open space of public value at 2.3 hectares per 1000 person will result in either more new provision or enhanced existing provision which can form habitats, wildlife corridors and other benefits.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Less open space may be created. Less potential for wildlife.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
4	To protect and enhance the Borough's characteristic landscape and its historic environment in urban and rural areas	<p>✓</p> <p>The provision of open space and areas of play is positive, although specific reference to landscape and historic environment is not included.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✓ ✗</p> <p>Government policy and other policies in the BFLP will cover some of these issues.</p> <p>Likelihood of effect: Likely Spatial scale: Open Spaces Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
5	To address the waste hierarchy by: minimising waste as a priority, reuse, then by recycling, composting or energy recovery	0	0	N/A
6	Minimise air, water, soil / ground, noise and light pollution and improve the quality of air, water	<p>?</p> <p>There is the potential for light and noise to be created from use of open spaces,</p>	<p>✓</p> <p>The Pollution Policy would seek to avoid adverse effects on this SA</p>	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	and contaminated land	especially sports pitches. This would be covered by the Pollution Policy. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	Objective. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	
7	Ensure appropriate, efficient, reliable and careful use and supply of energy, water, minerals, food and other natural resources.	0	0	N/A
8	To increase energy efficiency and support the delivery of renewable and low carbon energy	0	0	N/A
9	Facilitate sustainable economic growth and regeneration that provides employment opportunities for everyone and supports a successful, competitive, and balanced local economy that meets the needs of the area.	0	0	N/A
10	Develop opportunities for everyone to access a good education and to acquire the skills and knowledge to find work and support the sustainable growth of the local economy.	0	0	N/A
11	To meet local housing needs by ensuring that everyone has the	0	0	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	opportunity to live in a high quality, well designed and affordable home			
12	To protect and enhance human health and wellbeing	<p>✓</p> <p>The policy supports the provision of all types of open space and sports facilities in accordance with the need generated by a development.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Less open space, sports facilities and play spaces may be created. Less potential for increased connectivity may be realised too.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
13	To reduce poverty and social exclusion	<p>✓</p> <p>The provision of open space and play areas will be available for use by all.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>x</p> <p>Less open space, sports facilities and play spaces may be created. Less potential for increased connectivity may be realised too.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	N/A
14	To reduce and prevent crime and the fear of crime	<p>✓ x</p> <p>Consider including requirement to create safe and secure environments in the design of spaces and infrastructure.</p> <p>Likelihood of effect: Likely</p>	0	<p>✓</p> <p>The following text was added to the supporting text of POSS Policy 1: OSPV should also be designed create safe and secure environments</p>

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
		Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term		such as ensuring they are lit (where appropriate) and allow good surveillance. These matters should be considered in tandem with other policies in the Local Plan.
15	To create and sustain vibrant, locally distinctive and socially cohesive communities	✓ Provision of open space, play and sports facilities is considered to be positive. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✗ Less open space, sports facilities and play spaces may be created. Less potential for increased connectivity may be realised too. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	N/A
16	To provide accessible essential services, facilities and infrastructure.	✓ The delivery of open space, play and sports provision will have a positive effect on this SA Objective. Improving connectivity between sites is also considered to be positive. Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term	✗ Less open space, sports facilities and play spaces may be created. Less potential for increased connectivity may be realised too. Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term	N/A
17	To improve travel choice and accessibility, reduce the need for	✓ Improved connectivity between sites should	✗ Less open space, sports facilities	N/A

	SA Objective	Appraisal of Policy	Appraisal of No Policy Alternative	Response to proposed change / Recommendation
	travel by car and shorten the length and duration of journeys	<p>help reduce the need to drive to open spaces and other facilities which is positive. Adhering to the distance requirements in the supporting text should enable people to walk to nearest open spaces.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>and play spaces may be created in sustainable, easily accessible locations. Less potential for increased connectivity may be realised too.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	
18	To encourage sustainable development by improving efficiency in land use, design and layout. This includes making best use of previously developed land in meeting future development needs.	<p>✓</p> <p>By allowing <u>certain</u> SANG land to count as open space there is increased efficiency in land use as open space will not need to be provided twice as part of a development. Improving connectivity between sites is also positive.</p> <p>Likelihood of effect: Likely Spatial scale: Borough wide Temporary/permanent: Permanent Term: Short, medium and long term</p>	<p>✗</p> <p>Land may be required for Open Space and also for SANG which has the potential to require more space. If land cannot be utilised as both (it will not be possible in all cases), additional land may be required which can actually reduce overall sustainability of development if other infrastructure cannot be built. Less potential for increased connectivity between sites too.</p> <p>Likelihood of effect: Likely Spatial scale: Borough Temporary/permanent: Permanent Term: Short, medium and long term</p>	

Summary:

The policy requires that all development contribute towards open space, play areas and sports provision, where appropriate and where there is a need. Overall it is considered that this policy has positive effects on the SA Objectives. The creation of accessible linkages between open spaces is also positive.