
Shaping Elmbridge A New Local Plan



Sustainability appraisal for the draft local plan

June 2022



Elmbridge
Borough Council
... bridging the communities ...

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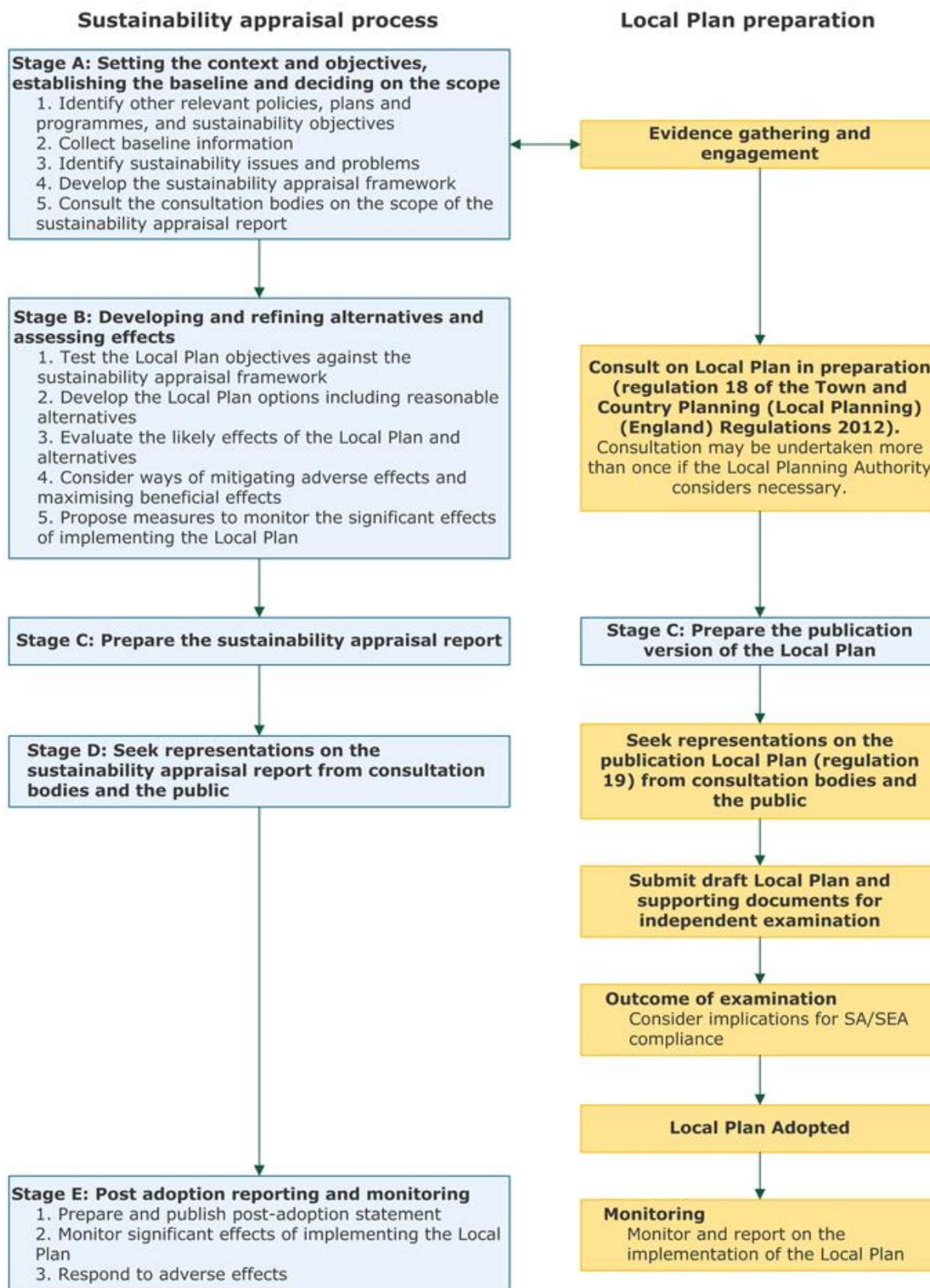
1. Introduction

Requirement for the Sustainability Appraisal (SA)

- 1.1 The role of the Sustainability Appraisal (SA) is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.2 Planning authorities are required to carry out a Strategic Environmental Assessment (SEA) in accordance with the requirements of a European Directive (2001/42/EC). This was enshrined in national law by the Planning and Compulsory Purchase Act 2004, which introduced a requirement to carry out Sustainability Appraisal (SA) for local plans. Sustainability Appraisal fully incorporates the European SEA requirements but expands it to also take account of social and economic matters. Thus, the requirements of the SEA Directive also apply to the wider remit of the Sustainability Appraisal.
- 1.3 The Sustainability Appraisal process is intended to be an integral part of preparing a Local Plan, rather than an adjunct to it. It helps planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans, and thus contributes to sound plan making. Sustainability Appraisal should inform the evaluation of alternatives and provide a key means to demonstrate the appropriateness of a plan given reasonable alternatives. It also suggests changes to the plan vision, objectives and policies ('mitigation') to make them more sustainable.
- 1.4 Therefore, Sustainability Appraisal is more than a simple checking exercise. It is a key part of the process of evaluating plans and proposals as they emerge. Planning practice guidance¹ on sustainability appraisal sets out the process in a number of stages, as follows:

¹ Planning Practice Guidance. Flowchart: Sustainability appraisal process. Paragraph: 013
Reference ID: 11-013-20140306

Figure 1: The Sustainability Appraisal and Plan Making Process



Elmbridge plan making stage is currently between stage C and D of the SA process.

What Plan Making and SA stages have happened so far?

- 1.5 Work on the new Local Plan commenced in 2014 with the formal decision to prepare a new Local Plan made by Cabinet in September 2016. Since the first issues and options stage, two more regulation 18 consultations have taken place as well as the development of a variety of evidence base documents to inform the Local Plan. Table 1 highlights the key stages in plan making and the SA process taken but the findings including reasonable alternatives will be discussed in section B2 of the report.

Table 1: Plan Making and SA Stages Timeline

Date	Local Plan Preparation	SA Steps	SA Outputs
December 2016- February 2017	Regulation 18 Strategic Options Consultation	Sustainability Appraisal Scoping Report and Initial Assessment of 3 options including the preferred option 2. Appendix 5 appraises the issues.	Option 2 was considered the most sustainable option overall but did score some minor negative environmental results.
August - September 2019	Regulation 18 Options Consultation	Sustainability Appraisal of 5 options with no preferred option.	Option 5 was considered the most sustainable option.
January - March 2020	Regulation 18 Creating our vision, objectives and the direction for development management policies 2020.	Sustainability Appraisal for the 5 objectives and 3 policy themes.	The borough's vision and objectives were considered positive in the main with limited minor negatives and some unknowns due to their general nature.
August 2020	2020 Scoping Report (Review of 2016 Scoping Report)	Updated findings in the Sustainability Appraisal Scoping Report and Initial Assessment .	Other plans and programmes were updated, baseline information was collected, and key priorities were updated to inform the draft Local Plan policies.

- 1.6 Tasks A1 to A5 from figure 1 were carried out initially in 2016 in developing the Sustainability Appraisal Scoping Report. As the above table shows, the scoping report has been reviewed and updated in 2020. The two-year delay in local plan making and the SA process was due to the number of changes to national policy and guidance that occurred throughout the preparation of the draft Local Plan. This included the Housing White Paper: Fixing our Broken Housing Market (February 2017), Planning for the Right Homes in

the Right Places (September 2017) and Proposed changes to the National Planning Policy Framework (NPPF) (March 2018 and February 2019). As a result, the council had to consider and respond to national consultations in terms of how each may affect the emerging spatial strategy and other plan policies.

- 1.7 The Sustainability Appraisals set out in the above table have been prepared by planning policy officers responsible for producing the local plan. This was considered appropriate, as the consideration of environmental, social and economic outcomes is the central element to deciding on the policy approach and the suitability of each site. As a result, the SA process has significantly influenced the content of the Local Plan.
- 1.8 That said, the SA still requires an element of independent evaluation and validation. Therefore, the 2016 scoping report and initial assessment included an external peer review with officers from Mole Valley District Council and Reigate and Banstead Borough Council. The 2020 scoping report and the draft local plan SA was peer reviewed by sustainability consultants Levett- Therivel to ensure the documents' compliance with the Environmental Assessment of Plans and Programmes Regulation 2004 (the SEA Regulations) and the planning and Compulsory Purchase Act 2004. A formal peer review note is presented at appendix 1.

Components of the Local Plan and what the SA is assessing.

- 1.9 The Local Plan replaces the current Core Strategy 2011 and Development Management Plan 2015 and combines these separate documents into one Local Plan that sets out how Elmbridge will develop up to 2037.
- 1.10 The Local Plan includes the vision and principles, spatial strategy for development and detailed policies to help implement the strategy. The Local Plan identifies key sites, allocates land for a range of uses and guides applicants on a range of policies. Table 2 shows the table of contents for the draft Local Plan.

Table 2: Table of contents for the Draft Local Plan

Spatial Strategy	SS1- Responding to the climate emergency
	SS2- Sustainable place-making
	SS3- Scale and location of growth
Principle 1: Tackling climate change	CC1- Energy efficiency, renewable and low carbon energy CC2- Minimising waste and promoting a circular economy CC3- Sustainable design standards CC4- Sustainable transport CC5- Managing flood risk

Principle 2: Protecting and enhancing our environment	ENV1- Green and Blue Infrastructure ENV2- Landscape, trees and woodlands ENV3- Local Green Spaces ENV4- Development in the Green Belt ENV5-Thames Basin Heaths Special Protection Area ENV6- Protecting, enhancing and recovering biodiversity ENV7- Environment Quality ENV8- Air quality ENV9- Urban Design Quality ENV10- Heritage Assets ENV11- Strategic Views
Principle 3: Delivering homes	HOU1- Housing Delivery HOU2- Optimisation of sites HOU3- Housing mix HOU4- Affordable housing HOU5- Housing technical standards HOU6- Specialist accommodation HOU7- Gypsy, Roma, Traveller and Travelling Showpeople accommodation HOU8- Self and custom build housing
Principle 4: Growing a prosperous economy	ECO1- Supporting the economy ECO2- Strategic Employment Land ECO3-Supporting our town, district and local centres ECO4- Promoting visitor attractions and arts and cultural venues ECO5- Equestrian-related development
Principle 5: Proving infrastructure and connectivity.	INF1- Infrastructure Delivery INF2- Social and community infrastructure INF3- Health and wellbeing of communities INF4- Play and informal recreation space INF5- Communications INF6- Rivers
Site Allocations	Urban site allocations: 199 sites

What does this report contain?

1.11 This SA report assesses the policies and sites set out in the draft Local Plan as shown above. These policies work at a range of levels from strategic to detailed policies and site allocations.

- 1.12 It covers Stages B, C and D of the SA process. Stage A is summarised in this report with the full assessment available to view in the updated Sustainability Appraisal Scoping Report 2020. Stage E cannot be undertaken before the Local Plan is adopted.
- 1.13 This report first assesses the draft principles of the Local Plan against the 16 sustainability objectives. This is undertaken in detail at appendix 2 and relates to stage B1 of the SA process.
- 1.14 The appraisal then moves onto assessing each policy in the draft Local Plan against the sustainability objectives. Each policy or site is assessed in turn, in order of how they appear in the draft plan. The detailed SA appraisals for the strategic and detailed policies are presented at appendix 3. The detailed SAs for the 199 urban sites are featured in the LAA 2022 and a summary table of the results is presented at appendix 4.

Limitations

- 1.15 Sustainability Appraisal is an extremely valuable exercise in terms of balancing various effects against each other and continues to be of great use drawing up plans and policies. However, it does not represent the whole of the analysis needed. Even where one option scores most positively in terms of sustainability, it may not be appropriate for other reasons.
- 1.16 One factor which SA can overlook is the likelihood of implementation. Some of these options may have much less certainty of delivery than others and this needs to be considered in drawing up a plan which is realistic and achievable. These considerations will be looked at in background evidence for the local plan and deliverability has been investigated in terms of sites which is set out in the land availability assessment.
- 1.17 Care also needs to be taken not to treat the SA as a quantitative exercise. It is not simply a matter of how many ticks are in the appraisal. On some sites, one positive effect may outweigh several negative effects and vice versa. Again, the background evidence will explain why such decisions have been made.

2. Stage A: Scoping summary

- 2.1 A scoping report brings together a collection of evidence in the plan-making process. It acts as a base for future assessment and monitoring of effects and informs the identification of reasonable alternatives. This was undertaken early in the plan making process in 2016 but has since been updated in 2020 to better reflect the current situation and inform the regulation 19 stage of plan making.
- 2.2 The scoping report comprises the following key tasks:
- A1: Identifying other relevant plans, programmes and sustainability objectives.
 - A2: Collecting baseline information.
 - A3: Identifying sustainability issues and problems.
 - A4: Developing the SA framework which will be used to test policy and allocation options in the plan.
 - A5: Consulting on the scope of the SA.
- 2.3 This section of the report summaries the findings of the 2020 scoping report. It also provides any updates to the scoping report since 2020 such as changes to policy and key baseline information.

Stage A1: Identifying and updating other plans, policies and programmes that may influence the content of the documents

- 2.4 This section of the report sets out all the current plans, policies and programmes that are relevant to the key SA themes and Local Plan. Although there have been many new plans, programmes and policies there has also been many plans deleted as they are no longer available or in use. New plans of particular relevance to the emerging Local Plan include:
- The Environment Act particularly the requirement for new developments to provide biodiversity net gain
 - National design guide- to guide new design supplementary planning guidance
 - Elmbridge Economic Strategy - although this is likely to change following the 2020 global pandemic.
 - Elmbridge's Carbon Footprint report 2020.
 - Housing, Homelessness and Rough Sleeping Strategy 2020-2024
- 2.5 Since the scoping report was updated last year, the National Planning Policy Framework was revised on 20 July 2021. The updated NPPF places greater emphasis on beauty, place-making, the environment, sustainable development and underlines the importance of local design codes.

- 2.6 It is also important to consider the strategic plans of neighbouring authorities as well as other key transport improvement schemes and county wide economic projects. Throughout local plan preparation and evidence base collecting, the council has worked actively and constructively with its neighbouring local authorities to understand their strategies for growth as well as large projects affecting their areas. Neighbouring local authorities planned housing and economic growth as well as the provision of infrastructure to support this are the key areas that are likely to affect sustainability conditions in Elmbridge.
- 2.7 Anticipated increases in road use from neighbouring authority's growth is the most significant area of concern. All Surrey local authorities work with the transport authority Surrey County Council (SCC) to ensure the existing local road network can accommodate the planned housing and economic growth in each area; or, if mitigation is required, how and when this will be delivered. Independent transport evidence alongside SCC Local Transport Strategy will help to identify whether the planned growth would impact on the local road network.
- 2.8 This section also features wider projects that are due to happen anyway like the Highways England M25 Junction 10 improvements, Surrey 2050 Place Ambition and the River Thames Scheme. All the projects discussed would all have positive impacts on the plan.

Stage A2: Gathering and updating relevant baseline information to inform the documents.

- 2.9 This section of the scoping report updates the baseline data collected and included in the previous 2016 Scoping Report. It produces a concise list of baseline data focusing on key indicators, so that this can be kept up to date to demonstrate important local sustainability issues.
- 2.10 The results of this comparison are that many of the indicators have stayed the same since 2016. Some have improved and some have worsened. The following list show those indicators that are significantly below target and are a priority for action.
- Affordable housing completions
 - New accommodation for Gypsies, Travellers and Travelling Showpeople
 - Number of vacant dwellings
 - Number of long-term vacant dwellings
 - Travel time to nearest hospital
 - Number of properties at risk from flooding
 - Water abstraction status
 - Amount of household waste
- 2.11 The following section (Stage A3) discusses these findings in more detail. It is also important to discuss the likely evolution of these sustainability issues

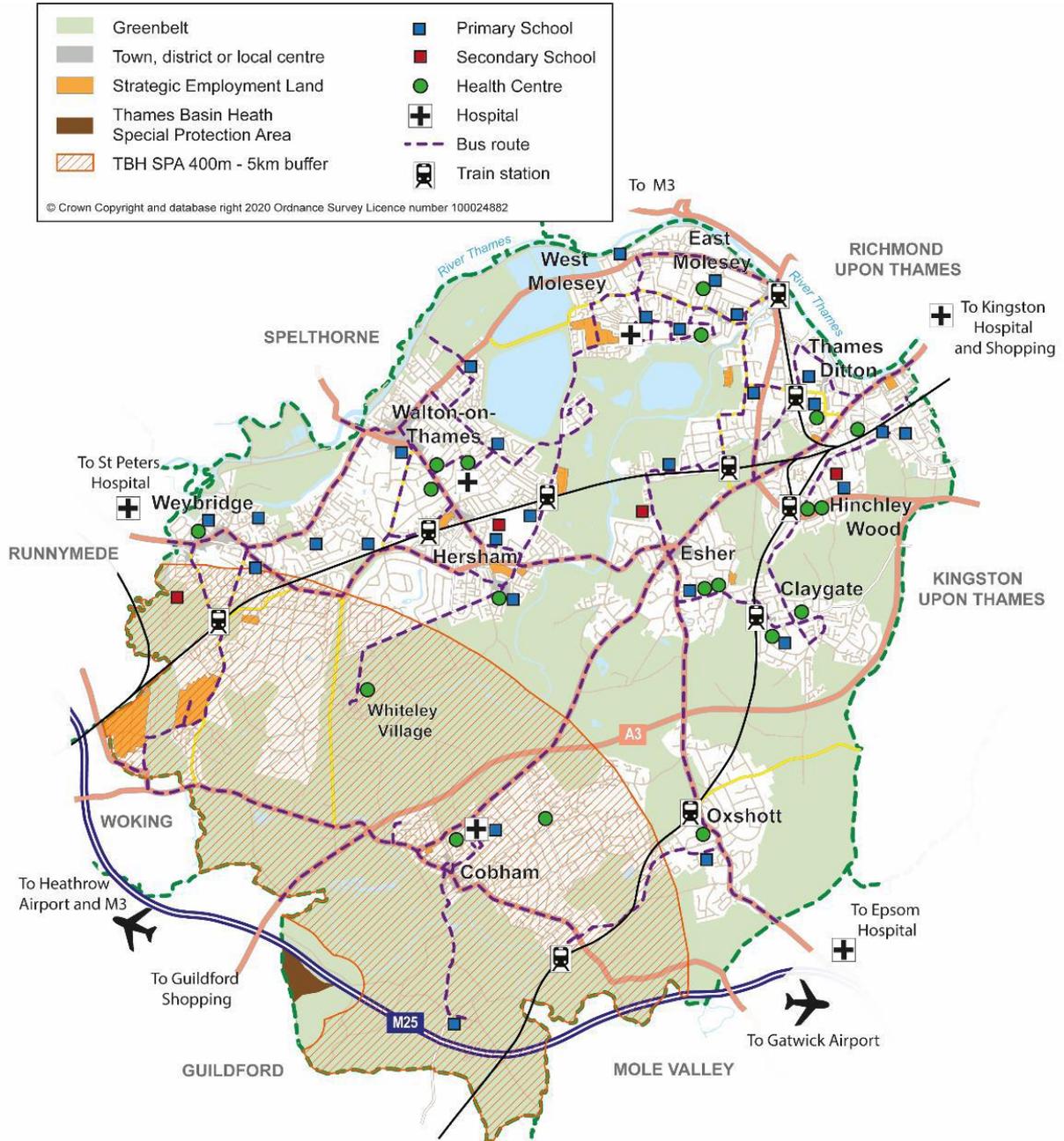
without a plan and the next section uses the above baseline data to help identify these.

Stage A3: Identifying and updating social, environmental and economic issues and problems that need to be addressed.

2.12 This section identifies the key sustainability issues in the borough using the updated baseline data detailed in stage A2. Key spatial characteristics are mapped and include:

- Linear transport links to London and Guildford (A3 and two rail lines)
- Road links (M25 and M3) to Heathrow and Gatwick international airports
- 58% of the borough is Green Belt
- The Thames Basin Heath Special Protection area is located to the south west of the borough.
- The River Thames forms the north boundary.
- Elmbridge shares its border with two London authorities, Royal Borough of Kingston upon Thames and the London Borough of Richmond upon Thames.
- Three NHS hospitals located outside the borough serve residents.
- Rail stations are not located in the borough's town or distinct centres.
- Two regional shopping centres (Kingston and Guildford) are located outside the borough.

Map 1: Key spatial characteristics in Elmbridge borough



2.13 This stage then goes on to present and analyse the data findings for the key sustainability themes. Specific maps relating to the theme help to provide the spatial dimension. The commentary discusses past trends and what sustainability aspects are expected to get better or worse. It also looks at

what would happen without a plan, what schemes will happen anyway and the predicated results of these changes.

- 2.14 Summaries of the findings and the key issues facing the borough that will require action have been set out in the following key sustainability themes:

Access and Equality

- Lack of affordable housing and increasing house prices.
- Gypsy, Roma and Traveller pitches not being provided.
- Amount of vacant homes in the borough impacting housing provision.
- Increasing older population with social and health care needs.
- Pockets of deprivation with barriers to services and homes, crime and income deprivation affecting children.
- Limited accessibility to health and education facilities

- 2.15 Without a plan, affordable housing delivery would get significantly worse as market homes dominate. This also would have an impact on the size of housing with four-bedroom detached dwellings being built as already witnessed in the past. House prices will rise, and the borough will continue its trend of being too expensive and inaccessible for low incomes families. Key workers such as teachers, police officers and social care workers would not be able to afford to live in the borough. This could result in a shortage of key workers, people moving away from the borough, inward commuting for work and in the worst-case scenario create a rise in homelessness.

Air, light and noise

- Planned growth, from the emerging Local Plan alongside neighbouring local planning authorities plans, could put pressure on the local road network which could continue the past trend of air pollution and congestion.
- New electric vehicles and associated electric charging infrastructure may in fact reduce air pollution.
- Increased work from home changes could also help to reduce air pollution.

Biodiversity, flora and fauna

- Condition of local biodiversity and the boroughs SSSIs is below target.
- Recreational pressure, atmospheric pollution, water quality and resources and loss of functionally linked land on the Thames Basin Heaths SPA; South West London Water Bodies SPA / Ramsar and neighbouring authorities SACs are issues that need to be addressed.

- 2.16 A small part of the borough overlaps with the Thames Basin Heaths Special Protection Area (TBHSPA) and most of the borough is within 7km of the TBHSPA. The TBHSPA forms part of a Europe-wide network of sites of international importance for nature conservation. It supports important populations of three vulnerable and rare ground-nesting species of birds: the

Dartford Warbler, Nightjar and Woodlark. The council has a responsibility (under The Conservation of Habitats and Species Regulations 2017, as amended) to ensure that development within the borough does not adversely affect the integrity of the TBHSPA. Disturbance from people and their pets using the TBHSPA for recreational purposes has a negative impact on the breeding success of these ground-nesting birds.

2.17 The population of wild birds and local biodiversity has seen a change to its status since 2016 and is now below target. Without a local plan policy on providing biodiversity net gains in development schemes, this could get worse.

2.18 Since the 2020 scoping report, work has progressed on a mitigation and avoidance strategy. It has become apparent that the borough's remaining existing SANG capacity is running out and could be exhausted in 11 to 15 years depending of the plans final housing target.

Climate Change

- Climate Emergency declared in 2019- borough has large ecological footprint.
- Increasing number of homes at risk of flooding.

2.19 The baseline data clearly demonstrates that flood risk areas are increasing, and this includes many more of the borough's properties in just four years. This has gone significantly below target and is a priority for action. Without a local flood risk policy this could have detrimental impacts on property and people living in Elmbridge.

Cultural heritage and historic environment

2.20 Statutory listed buildings, conservation areas at risk and scheduled ancient monuments at risk have stayed below target for the last four years. With planned housing growth in the borough's town and village centres, where the majority of heritage assets are located, a local plan policy that aims to enhance the borough's cultural heritage and historic environment is important to prevent this worsening. Without a plan, cultural heritage and the historic environment may not be protected or enhanced as new developments are prioritised.

The Economy

- Pressure on employment land use for housing.
- Online shopping an ongoing trend that will impact on the role of the borough's local shopping centres.
- The 2020 global pandemic will have a major impact on the local economy.

2.21 Without a plan, the borough's strategic employment land could be lost to residential development which would reduce the local economy. People would need to travel outside the borough for work which could impact on pollution from car use. Town, district and local centres could also lose their

vitality and viability as more buildings are converted to residential. Travelling outside the borough to access retail and leisure uses could also add to the road network volume.

Health and well-being

- Assess to green infrastructure, in particular public parks and children's play provision is needed in the borough.
- 2.22 A local plan policy will allow important green infrastructure such as play space and local parks to be provided as part of new development schemes making sure everyone has access to green space for both physical and mental health benefits. Without a site allocation policy and local plan policy on play spaces, these could be overlooked as developers maximise land for housing development.

Landscape

- The percentage of dwellings built on previously developed land in the urban area is declining which puts development pressure to build on the Green Belt.
- 2.23 Development on Green Belt land presents sustainability issues such as soil erosion, biodiversity losses and flooding. Without a local plan and specific environmental policies, it would be difficult to mitigate and lessen these potential negative effects.

Natural Resources

- Area of serious water stress
 - Amount of household waste being produced.
 - Previously developed land declining and housing densities low.
- 2.24 The likely evolution of this situation without a plan could result in less urban land and increasing pressure to develop the Green Belt, which has social and environmental impacts.
- 2.25 Elmbridge Borough is identified by the Environment Agency as falling within one of the designated 'Areas of serious water stress' and planned growth (in addition to other pressures) is forecast to lead to an increasing supply demand deficit, according to the two main water suppliers in the borough; Affinity Water (AWS) and Thames Water (TWUL). Both AWS and TWUL have highlighted several potential solutions to ensure sufficient water supply for the plan period and these will help to mitigate the impacts of development. Without a local plan, this could be more difficult to implement these mitigation strategies early at the development proposal stage.

A4: Developing a framework for appraising the documents to identify the key sustainability effects.

2.26 The SA framework was reviewed and updated jointly by the East Surrey authorities in April 2015. As a result, 16 SA objectives were agreed, and these are set out in Figure 2. Since the 2016 scoping report, the objectives have been reviewed but remain the same.

Figure 2: East Surrey Authorities Agreed Sustainability Objectives

1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.
2. To facilitate the improved health and wellbeing of the whole population.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.
5. To make the best use of previously developed land and existing buildings.
6. To support economic growth, which is inclusive, innovative and sustainable.
7. To provide for employment opportunities to meet the needs of the local economy.
8. To reduce greenhouse gas emissions and move to a low carbon economy.
9. To use natural resources prudently
10. To adapt to the changing climate.
11. To reduce flood risk.
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.
13. To reduce land contamination and safeguard soil quality and quantity.
14. To ensure air quality continues to improve and noise and light pollution are reduced.
15. To protect and enhance landscape character.
16. To conserve and enhance biodiversity.

2.27 Table 3 sets out the scoring mechanism used for the appraisals. These are represented through symbols ranging from significant (major) to minor positive and negative impacts. Commentary is included in the appraisals to explain the reasoning for the score. The sustainability framework decision aiding questions are available at appendix 3 of the scoping report 2020 and help to explain the reasoning for the score.

Sustainability Appraisal Scoring Mechanism

Table 3: Sustainability Appraisal Scoring Mechanism

	Description	Symbol
Significant positive impact	Significant positive change towards sustainability	++
Minor positive impact	Minor positive change towards sustainability	+
Neutral	The option contributes neither positively nor negatively towards the SA Objective	0
Minor negative impact	Minor negative change towards sustainability	-
Significant negative impact	Significant negative change towards sustainability	--
Uncertain	It is unclear whether there is the potential for a negative or positive effect on the SA Objective	?

A5: Consulting on the scope.

2.28 It is a statutory requirement that the scoping report be sent to the three Environmental Consultation Bodies, the Environment Agency, Natural England and Historic England. An e-mail informing them of the review and providing the draft scoping report was sent on the 3 July 2020 for a six-week period ending on 17 August 2020. All three consultation bodies responded to the draft and provided comments, which are available to view in the scoping report appendix 5 and 6.

2.29 Historic England stated that they were content that the scoping review for the Elmbridge Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets. A link to generic guidance on how Historic England will be involved in each SA stage was provided.

- 2.30 Natural England consultation response includes a number of plans and strategies to be included in stage A1 of the scoping report. It suggests that certain designations are taken into account when creating future site allocations and that the results of the Habitats Regulation Assessment should inform the SA. They also suggest the use of Defra's Biodiversity Metric 2 for measuring and recording net gains.
- 2.31 The Environment Agency provide a detailed response to the scoping report. Advice is offered on the next stage of SA (stage B), particularly that reasonable alternatives and monitoring will need to be explained. How cumulative minor development will impact on flood risk, air quality and other environmental impacts will need assessing.

3. Stage B: Developing and refining the alternatives

- 3.1 Stage B of the sustainability appraisal process tests the local plan objectives, alternatives, policies and sites against the SA framework. This section will go through every task in stage B of the sustainability appraisal process and explains how the policies in the draft Local Plan have evolved.
- 3.2 It is important to note at the very beginning on this chapter that only reasonable alternatives are tested. A ‘no policy’ alternative, which many other Local Planning Authorities test, is not considered reasonable for the strategic policies, detailed policies and sites allocations. This is because having no policy will not meet the objectives of the plan. There is a requirement to seek to address housing need in the borough as well as tackle climate change, protect the environment, encourage economic growth and deliver infrastructure. These issues have been highlighted as requiring action in the Scoping Report 2020 and therefore a ‘no policy’ or ‘do nothing’ alternative is not reasonable and is not tested.
- 3.3 Alternatives have been tested for the strategic policies as these provide policy options for the borough’s significant issues such as the broad spatial approach, the delivery of development, tackling climate change and place making. Specific issues were tested with alternatives in the 2016 Spatial Options consultation and these have previously informed many of the detailed policies. Only when these have been updated or specific alternatives were suggested at the regulation 18 consultations, has an alternative been tested.
- 3.4 Many detailed policies do not have alternatives because these are providing the policy detail for the strategic policy that has already been subject to reasonable alternatives to achieve the objectives of the plan. There are no alternatives for the site allocations as no other site uses have been suggested.

B1: Test the Local Plan objectives against the sustainability appraisal framework

- 3.5 To tackle the key priorities for action explained in the 2020 scoping report review and summarised in paragraph 2.10, the draft Local Plan vision is as follows:

By 2037, Elmbridge will be more resilient to the impacts of climate change. The Council accepts its responsibility to make a resilient environment, to reduce carbon

emissions and to deliver positive outcomes for future generations. The Council will positively lead on a commitment to ensure every decision is made with the achievement of low carbon and net zero in mind, with delivering sustainable growth and the use of renewables as standard.

The Council will renew, enhance and protect green and blue spaces across the borough, with better connectivity for the benefit of both people and wildlife. Residents will benefit from improved air quality, minimised noise, flood risk and other polluting impacts, and a reduction in carbon and water demands by minimising detrimental impacts from development.

Building on the success of our existing communities, the built environment will be well designed, beautiful and will offer high quality public realms, contributing to the uniqueness of each settlement.

Excellent design will safeguard the built, historic and natural environment for the health and wellbeing of existing residents and future generations.

Residents, existing and new, will have the choice of a range of housing types that meet their needs. Our town, district and local centres will act as social, arts and commercial hubs, nurturing communities and businesses and allowing our culture and economy to flourish. There will be high quality digital connectivity enabling flexibility in the evolving patterns of working.

Good growth will be supported by the delivery of the right infrastructure in the right place, at the right time. Innovative solutions will be used to improve transport interchanges, to manage the highway network for all users, and foster a shift in travel behaviour towards more people walking and cycling, particularly for short journeys.

3.6 The vision has been informed by comments received from all three regulation 18 consultations but particularly the vision consultation in 2020. For this consultation, the public and stakeholders were asked to help form a shared vision. A list of ambitions was presented, and the consultation question asked if people agreed with these and whether anything else could be added to the vision. The feedback received from respondents has been important to the content of the above vision. Please see the [consultation statement](#) for further information. Additionally, Members of the Local Plan working group have also participated in its production during the drafting the Local Plan for regulation 19.

3.7 To address the key issues facing Elmbridge and to achieve the vision, the new Local Plan will need to make clear what are the key objectives that new development and growth will need to focus on delivering. The following five objectives were consulted upon in the vision regulation 18 consultation in January 2020.

- 1. Deliver sustainable development and vibrant places that are excellently designed to achieve a better quality of life, a prosperous economy and a healthy built and natural environment for the benefit of existing residents and future generations.**

2. To adapt to, and mitigate, the effects of climate change; to reduce carbon dioxide emissions, minimise energy use; improve air quality and protect and enhance our natural environment.
3. To provide the environment and opportunities to foster a prosperous economy with modern, flexible and well-connected workspaces where industries and businesses can thrive. Where our locally distinctive centres offer a vibrant place to live, work and socialise, continuing to be the heart of our communities.
4. To deliver quality homes for all to create inclusive communities, promoting healthy lifestyles and positively contribute to the physical and mental health and wellbeing of those that live, work and visit the borough.
5. Ensure the delivery of the right infrastructure in the right place and at the right time to support growth.

3.8 Please note that these objectives are now referred to as principles, but they still have the same aim which is to flow from the critical issues identified and support the delivery of the vision.

Table 4: Overview of SA results for the 5 objectives

	1. Homes	2. Health	3. Heritage	4. Accessibility	5. Previously Developed Land	6. Economic growth	7. Employment	8. Energy	9. Natural Resources	10. Climate Change	11. Flood Risk	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
Objective 1	0	+	?	+	?	0	0	0	?	0	0	0	?	0	?	?
Objective 2	-	+	?	+	?	0	?/-	++	?	++	+	0	?	++	?	?
Objective 3	? /-	+	?	++	?	++	++	++	?	?/-	?/-	-	?	?/-	?	?
Objective 4	++	++	?	+	?	0	?/-	?/-	?	?/-	?/-	-	?	?/-	?	?
Objective 5	+	+	?	+	?	+	+	?	?	?	?	-	?	?/-	?	?

3.9 Objective 1 includes many neutral results that contribute neither positively or negatively towards many of the environmental, economic and social SA objectives. This is due to the broad nature of this first policy objective. There is also a number of unknown results due to the limited information. This is common across all five objectives. The objective did score two minor positive results in terms of facilitating the improved health and well-being of the whole population and accessibility to services.

- 3.10 Objective 2 has potential significant positive impacts across many of the environmental SA objectives particularly SA 8, 10 and 14. Minor negative impacts could affect SA objective 1 and 7 as adapting and mitigating the effects of climate change could affect economic and housing growth.
- 3.11 Objective 3 would have potential significant positive effects across the economic SA objectives particularly SA objective 6 and 7. Again, the objective scores many minor negative impacts across the social and environmental SA objectives as economic growth competes with those aims.
- 3.12 Objective 4 will have potential significant positive effects across the social objectives especially SA objectives 1 and 2 but this has potential negative impacts on many of the environmental SA objectives as housing growth could impact on environmental objectives.
- 3.13 Objective 5 generally has potential positive impacts across the social economic and some environmental objectives. However, depending on the infrastructure proposed this could also result in minor negative impacts to the environment. The Environment Agency has suggested re wording the objective to “ensure the delivery of the right infrastructure in the right place and at the right time to support growth, people and the environment”. This would help to address this uncertainty and achieve the environmental SA objectives.
- 3.14 These objectives, which are now referred to as principles, were developed to take account of the results of the SA and consultation feedback. The council was also keen that the vision and principles must tackle the climate change emergency particularly in light of the discussions from COP26 in November 2021. There are now five redrafted objectives, now principles, in the draft plan that will aim to deliver the vision and form the themes for the detailed policies. These are:

Principle 1: Tackling Climate Change

To adapt to, and mitigate, the effects of climate change; to reduce carbon dioxide emissions, minimise energy use; improve air quality and protect and enhance our natural environment.

To improve the borough’s resilience to climate change.

Principle 2: Protecting and enhancing the quality of the environment

Promoting cleaner and greener living, in order to conserve and enhance biodiversity, whilst creating a sustainable environment to live, work and spend our leisure time.

Ensuring strong protection of the Green Belt from inappropriate development and protecting and enhancing green and blue spaces to improve biodiversity, connectivity and access.

Preserving and enhancing our recognised heritage assets. Ensuring they continue to be conserved in a manner appropriate to their significance.

Principle 3: Delivering homes

Improving housing choice and delivering well-designed high-quality homes that we need in a highly sustainable way.

Creating, strong and thriving communities.

Principle 4: Growing a prosperous economy

Providing the environment and opportunities to foster a prosperous economy with modern, flexible and well-connected workspaces where industries and businesses can thrive.

Supporting our town and village centres and managing their transition into distinctive places of socialisation, community support, events and culture which are less dependent on a retail offer.

Principle 5: Providing infrastructure and connectivity

Reducing reliance on the car, reducing issues of air quality and congestion and supporting modal shift in the way people live and access local services, workspaces and facilities.

Coordinating the delivery of the right infrastructure in the right place and at the right time for the benefit of residents, businesses, visitors and biodiversity and the natural environment.

- 3.15 The SAs for the five principles (appendix 2) have not included SA objective 5 'To make the best use of previously developed land' and SA Objective 7 'To provide for employment opportunities to meet the needs of the local economy' because these principles are high level and not intended to be detailed.

Table 5: Overview of SA results for the 5 principles.

SA Objectives	1. Homes	2. Health	3. Heritage	4. Accessibility	7. Economic growth	8. Energy	9. Natural Resources	10. Climate Change	11. Flood Risk	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
Principle 1	0	+	0	0	0	+	+	++	+	+	+	+	+	+
Principle 2	0	++	++	++	+	+	+	++	+	+	+	+	++	++
Principle 3	++	++	0	0	0	+	0	+	0	0	0	0	0	0
Principle 4	0	+	+	+	++	+	0	+	0	0	0	+	0	0
Principle 5	+	++	0	++	+	++	0	+	+	+	+	++	0	+

3.16 The summary table of the results show that there are now no negative impacts. This is because the principles are more inclusive of the economic, social and environmental benefits that can be achieved alongside the core principle itself. For example, principle 3 ‘Delivering homes’ now states that development must be delivered ‘in a highly sustainable way’ and hence adds the general improvement to any negative environmental impacts expected from the additional growth into the principle.

3.17 The nature of the principles is that they are high level and do not contain the mitigation detail. This does make it more difficult to assess the likely effects, but the overall aim of each principle is to balance the social, economic and environmental impacts. The detailed policies will help to explain how this can be achieved.

3.18 The draft plan’s five principles are all positive in their aims, but there are those that have scored positive impacts across all or nearly all SA objectives. These are SA objectives 2, 8 and 10 (facilitating the improved health and well-being of the whole population, the reduction of greenhouse gases and adapting to climate change). These are three key sustainability issues highlighted in the scoping report as priority actions that Elmbridge must tackle. Therefore, it is considered that these principles will help to steer future development in the borough that is socially, economically and environmentally sustainable.

3.19 The annual monitoring report will require indicators to ensure that these principles are being achieved on an annual basis.

B2: Develop the Local Plan options including reasonable alternatives.

- 3.20 This section of the report explains how the reasonable alternatives, also known as options, have been developed and appraised and how the results are informing the spatial strategy for the draft Local Plan. It is not just the results of the sustainability appraisals that informs this decision, but the evidence base documents, viability evidence and consultation feedback.
- 3.21 This analysis focusses on the spatial strategy particularly in relation to meeting the borough's housing needs. It also includes alternatives for the strategic policies (climate change and sustainable place-making) and the detailed policy on biodiversity as a result of feedback from the regulation 18 consultations.

Level of housing need in Elmbridge

- 3.22 To support the Government's commitment to significantly boost the delivery of new homes and ensure a sufficient supply of housing land, the council is required to determine the minimum number of homes needed locally and to set out in the Local Plan how this will be delivered.
- 3.23 In 2016, a joint Strategic Housing Market Assessment found that 9,480 new homes would be needed by 2035 (474 homes per year over 20 years)². The first regulation 18 consultation (the Strategic Options) presented 3 options for meeting this need. At this early stage in plan making, the exact sites and housing numbers for each option were not presented.
- 3.24 In 2018, the Government introduced a standard method for calculating housing need, which all local authorities are expected to use. This is based on Office of National Statistics population projections from 2014. Using this method, Elmbridge Borough needs to deliver 623 new homes per year over 15 years. The standard methodology calculation was updated in 2020 and now equates to 641 dwellings per annum, i.e. **9,615 homes** over the 15-year plan period.
- 3.25 The Office of National Statistic's population projections of 2016 and 2018 both result in a lower housing need figure. However, the National Policy Planning Framework (NPPF) of 2021 states that local authorities should continue to use the 2014 projections unless exceptional circumstances apply. The Local Housing Market Assessment 2020³ confirmed that there are no exceptional circumstances for diverging from the requirement in the NPPF. It was considered that a longer period of time was required to assess

² [Kingston and North Surrey Strategic Housing Market Assessment \(SHMA\) 2016.](#)

³ [Local Housing Market Assessment, 2020.](#)

whether the lower housing projections was a long-term trend. Additionally, the divergence in the projections was not considered locally specific and uncommon across local authorities or uncommon in term of the scale of consequences⁴. Therefore, the increased number of 641 dwellings per annum is used as a basis for the emerging Local Plan.

- 3.26 Housing need refers not only to the numbers of dwellings needed, but also to the type, size and tenure of housing needed for existing and future populations. This includes affordable housing, smaller homes, and specialist accommodation such as pitches for Gypsies and Travellers. The next section explains how the different options for meeting this housing need have been developed and the iterative process that has taken place.

Possible locations for housing in Elmbridge

- 3.27 The analysis of where the necessary housing could be located in the borough has been informed by an [Urban Capacity Study 2018](#) and [Land Availability Assessments of 2018, 2021 and 2022](#). The studies concluded that there are very few, if any, large sites in the urban area that can accommodate the mix of homes needed, and particularly specialist accommodation. It was therefore considered necessary to assess Green Belt land (around existing settlements) as a possible location for housing in Elmbridge.
- 3.28 A [Green Belt Boundary Review](#) was conducted on behalf of the Council by Ove Arup and Partners (Arup) in 2016 and considered how the Green Belt performs against the purposes set out within the NPPF⁵. One of the outputs of this work was the identification of a series of Local Areas that were judged to perform weakly against the purposes of designation. This information was used to consider areas of land which may be suitable for release from the Green Belt subject to more detailed assessment and consideration of exceptional circumstances (if such an approach was deemed necessary to meet identified development needs).
- 3.29 Some alternatives for meeting housing need were considered early in local plan preparation, but were felt to be unreasonable and were not analysed further:

- Continuing with the adopted Core Strategy would not provide for the number of homes needed and would not comply with national policy;
- A new town in the southern part of the borough would severely encroach on the Green Belt and would have implications for adjacent local authorities; and

⁴ Please see the topic paper 'Establishing the Housing Need' for more information.

⁵ These purposes are set out in the National Planning Policy Framework (para. 138) and are: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- The use of strategic employment land for housing would be detrimental to the local economy and could increase commuting distances.

The justification for these decisions is detailed further in the 2016 [Alternative Development Options](#) paper.

Regulation 18 Round 1: The Strategic Options (2016)

- 3.30 The first Regulation 18 public consultation '[The Strategic Options consultation](#)' 2016 presented the following three Strategic Options, that were considered reasonable for a new spatial strategy. It assumed that 474 homes/year would need to be delivered. The options took into account the Green Belt Boundary Review evidence 2016 and the fact that some parts of the borough's Green Belt are 'weaker' than others in terms of meeting the five purposes of the Green Belt.
- 3.31 In total thirteen Local Areas were deemed to perform weakly and were subsequently evaluated for their development potential. An assessment of the [absolute constraints](#) affecting these Local Areas, and their capacity to accommodate strategic-scale development, identified three potential Key Strategic Areas- these are the three sites presented for strategic option 2.

Strategic Option 1 would maintain existing Green Belt boundaries and deliver all development by concentrating development within the urban area by:

- Significantly increasing densities on all sites in the urban areas; and
- Identifying open spaces such as allotments and playing fields for redevelopment and relocating these uses within the existing Green Belt; and
- Using the Duty to Co-operate to enquire as to whether other authorities have the potential to meet some of our need.

Strategic Option 2 would as far as possible meet development needs whilst maintaining development at appropriate densities in the urban area by:

- Increasing densities on sites in the urban area only where it is considered appropriate and would not impact significantly on character;
- Amending Green Belt boundaries where:
 - the designation is at its weakest;
 - the areas are in sustainable locations; and
 - the areas are not, or are only partially, affected by absolute constraints.
 Three 'key strategic areas' were identified where opportunities for accommodating development needs would be explored taking into account site constraints, land ownership, the need to support sustainable development, and compliance with other planning policies; and
- Using the Duty to Co-operate to enquire as to whether other authorities have the potential to meet some of our need.

Strategic Option 3 would deliver development needs of the Borough in full and explore opportunities to meet needs of other Boroughs and Districts in the Housing Market Area by:

- Increasing densities on sites in the urban area only where would be considered appropriate and would not impact on character; and

- Allocating sites in the Green Belt for the rest of the needed housing, regardless of the strength of the Green Belt.

3.32 All of the options included a 'brownfield first' approach and would increase densities on sites in the urban area. However, options 2 and 3 also included changing Green Belt boundaries to meet need and provide a mix of housing. Apart from the three strategic areas in the Green Belt, no sites were mapped. As a result, sustainability appraisals were not carried out for individual sites to test sustainability of sites themselves. Table 6 shows the results of the 2016 Strategic Options SA. The detailed sustainability appraisals for each option is available to view in section 7 of the [Sustainability Appraisal Scoping Report and Initial Assessment 2016](#).

Table 6: SA of 2016 Strategic Options

	Strategic Option 1: Intensify urban area	Strategic Option 2: Optimise urban area and 3 areas of Green Belt release	Strategic Option 3: Optimise urban area and large Green Belt release
Homes	-	+	++
Health	0	++	+
Heritage	--	+	-
Accessibility	0	+	--
PDL	+	+	+
Economic growth	+	+	+
Employment	--	?	?
Energy Use	--	-	--
Natural Resources	-	-	--
Climate Change	-	+	+
Flooding	--	-	-
Water	?	?	?
Land	+	?	--
Pollution	--	-	--
Landscape	-	+	--
Biodiversity	-	+	--

3.33 Although Strategic Option 1 scored positively in terms of making best use of previously developed land, reducing land contamination and supporting sustainable economic growth, it resulted in five major and five minor negative environmental impacts. This was particularly relevant to the historic environment, flooding and pollution due to development being maximised in the borough's town and village settings. Even though this option would meet the housing need figure in full, it would not necessarily be able to provide the full range of housing types needed: the lack of large sites that could accommodate affordable housing, specialist housing, small family homes

and Gypsy and Traveller pitches would be limited in the urban area and therefore a minor negative impact was expected for homes.

- 3.34 Strategic Option 2 aimed to meet the housing need, including types of homes. It included three key strategic areas in the Green Belt that were large enough to provide for a mix of housing, therefore a minor positive impact was expected for housing. Although it did score four minor negatives in terms of the environment, it was expected to have positive social and economic impacts which meant that this option was considered the most sustainable overall.
- 3.35 Strategic Option 3 had the most significant negative impacts due to the distribution of development across the whole of the borough including urban and Green Belt land. However, significant positive impacts were expected for homes as this option would deliver all the need and be able to deliver affordable housing, small family homes and traveller pitches.
- 3.36 Having considered the evidence base and the sustainability of the options above, Option 2 was the council's preferred option. It was considered to balance the Government's ambition to increase the levels of development in the borough whilst recognising that there are constraints on the amount of developable land which could prevent meeting development needs in full.

Consultation feedback on the Strategic Options

- 3.37 However, many respondents opposed any alterations to the Green Belt boundaries for the purpose of meeting development needs. They argued that the exceptional circumstances⁶ needed to justify the release of land from the Green Belt did not exist; that releasing Green Belt now would lead to pressure to do so again in the future; that the council had not worked hard enough to find sites in the urban areas; and that building should take place at higher densities within the urban areas. However, respondents who lived in the borough's urban areas opposed their further intensification.
- 3.38 Respondents suggested several additional alternatives:
- Undertaking further work to identify surplus land in neighbouring local authorities to meet Elmbridge's housing needs. Further discussions with the neighbouring local authorities concluded that they would not be able to provide housing land for Elmbridge's future growth;
 - Building a new town or village. This had already been rejected due to its impact on the Green Belt;
 - Doing nothing and maintaining the council's existing strategy and housing target. This had already been rejected because it would not meet the borough's housing need⁷.

⁶ The National Planning Policy Framework (para. 140) states that "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans"

⁷ [Alternative Development Options](#) paper 2016.

- 3.39 Respondents also commented that the three ‘Key Strategic Areas’ of Option 2, identified through the Green Belt Boundary Review 2016, were too large and that further work should be undertaken to determine whether smaller local areas could be released.
- 3.40 In response to these suggestions, the council commissioned independent consultants to undertake an Urban Capacity Study to assist the Land Availability Assessment 2018 in identifying sites that could boost the borough’s land supply. Consultants also undertook a fine-grained review of the Green Belt to identify smaller sub-areas that could be assessed against the Green Belt purposes⁸.

Regulation 18 Round 2: The Options Consultation (2019)

- 3.41 Based on the consultation responses as well as updated evidence on land supply and the (then-correct) housing need figure of 623 homes per year (total 9,345 homes), five options were developed for how the Local Plan could respond to the challenge of housing need. Box 1 summarises the assumptions underlying the options. A second regulation 18 public consultation presenting the revised options was opened in August 2019. This included an [indicative map](#) of possible housing sites, and the number of dwellings that each site could be expected to provide. Each option was based around groups of specific housing sites. No preferred option was put forward.

	Option/ Alternative	No. homes
<p>Option 1. Intensify urban area:</p> <p>Existing option from 2016 consultation</p>	<p>Option 1 would deliver all the new homes by:</p> <ul style="list-style-type: none"> • Significantly increasing densities⁹ on all sites across the urban area. • Identifying open spaces, such as allotments and playing fields for redevelopment and relocating these uses within the existing Green Belt. 	<p>9,345</p> <p>623 per annum</p> <p>See Map 1</p>
<p>Option 2. Optimise urban area and 3 areas of Green Belt release</p> <p>Existing</p>	<p>Option 2 would not meet housing need in full but would deliver new homes by:</p> <ul style="list-style-type: none"> • Optimising densities¹⁰ and ensuring effective use of land across the urban area, and that new homes are of the right type to meet local needs. • Creating areas for new homes by removing land from the Green Belt where it is: <ul style="list-style-type: none"> • weakly performing the purpose(s) of Green Belt policy; and 	<p>6,800</p> <p>453 per annum</p> <p>See Map 2</p>

⁸ [Green Belt Boundary Review Subdivision Report](#), 2018

⁹ **Intensification** would be seeking to maximise the number of homes a development site could accommodate with little regard for the existing character of the area across the borough.

¹⁰ **Optimisation** would be seeking to get the best out of each development site to ensure that schemes for new homes use land efficiently. This includes ensuring that new homes are of the right mix in terms of size and tenure and that the design and scale of new development respects the individual character of an area.

option from 2016 consultation	<ul style="list-style-type: none"> • in a sustainable location for new homes; and • not, or only partially, affected by absolute constraints which prevent development coming forward. <p>• Using the Duty to Co-operate to see if other authorities can meet some of Elmbridge's need.</p>	
<p>Option 3. Optimise urban area and large Green Belt release</p> <p>Existing option from 2016 consultation</p>	<p>Option 3 would deliver all the new homes needed for Elmbridge Borough, and would be able to help neighbouring authorities to meet their housing need by:</p> <ul style="list-style-type: none"> • Optimising densities and ensuring effective use of land across the urban area, and that new homes are of the right type to meet local needs. • Creating areas for new homes by removing land from the Green Belt where it is: <ul style="list-style-type: none"> • weakly performing, or not essential for the Green Belt policy to work properly; and • being put forward for development by the landowner regardless of strength or importance; and • not, or only partially, affected by absolute constraints which prevent development coming forward. 	<p>16,300</p> <p>1087 per annum</p> <p>See Map 3</p>
<p>Option 4. Optimise urban area</p> <p>New option</p>	<p>Option 4 would not meet housing need but would deliver new homes by:</p> <ul style="list-style-type: none"> • Optimising densities and ensuring effective use of land across the urban area and that new homes are of the right type to meet local needs. • Using the Duty to Co-operate to see if other authorities can meet some of Elmbridge's need. 	<p>5,300</p> <p>353 per annum</p> <p>See Map 4</p>
<p>Option 5. Optimise urban area and small areas of Green Belt release</p> <p>New option</p>	<p>Option 5 would deliver all the new homes needed by;</p> <ul style="list-style-type: none"> • Optimising densities and ensuring effective use of land across the urban area and that new homes are of the right type to meet local needs. • Creating areas for new homes by removing smaller sub-divided parcels of land from the Green Belt where it is: <ul style="list-style-type: none"> • weakly performing, or not essential for the Green Belt policy to work properly; and • not, or only partially, affected by absolute constraints which prevent development coming forward 	<p>9,400</p> <p>627 per annum</p> <p>See Map 5</p>

Box 1: Indicators to test significant effects of implementing plan policies.

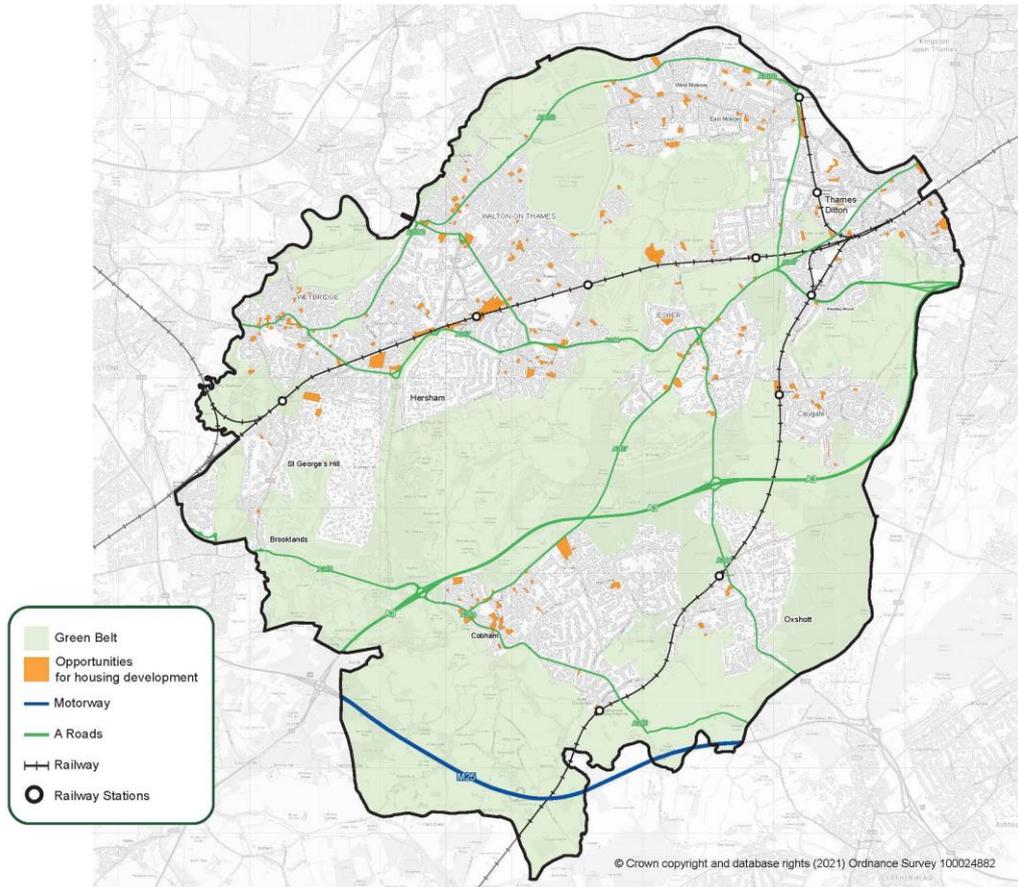
All five options included sites under construction and sites with planning permission (minus 10% to reflect possible non-implementation) at a base date of 30 September 2018. They all used the [Land Availability Assessment \(LAA\) 2018](#)

sites for the urban area totals, minus 15% for possible non-implementation. No windfall allowance was applied to the figures.

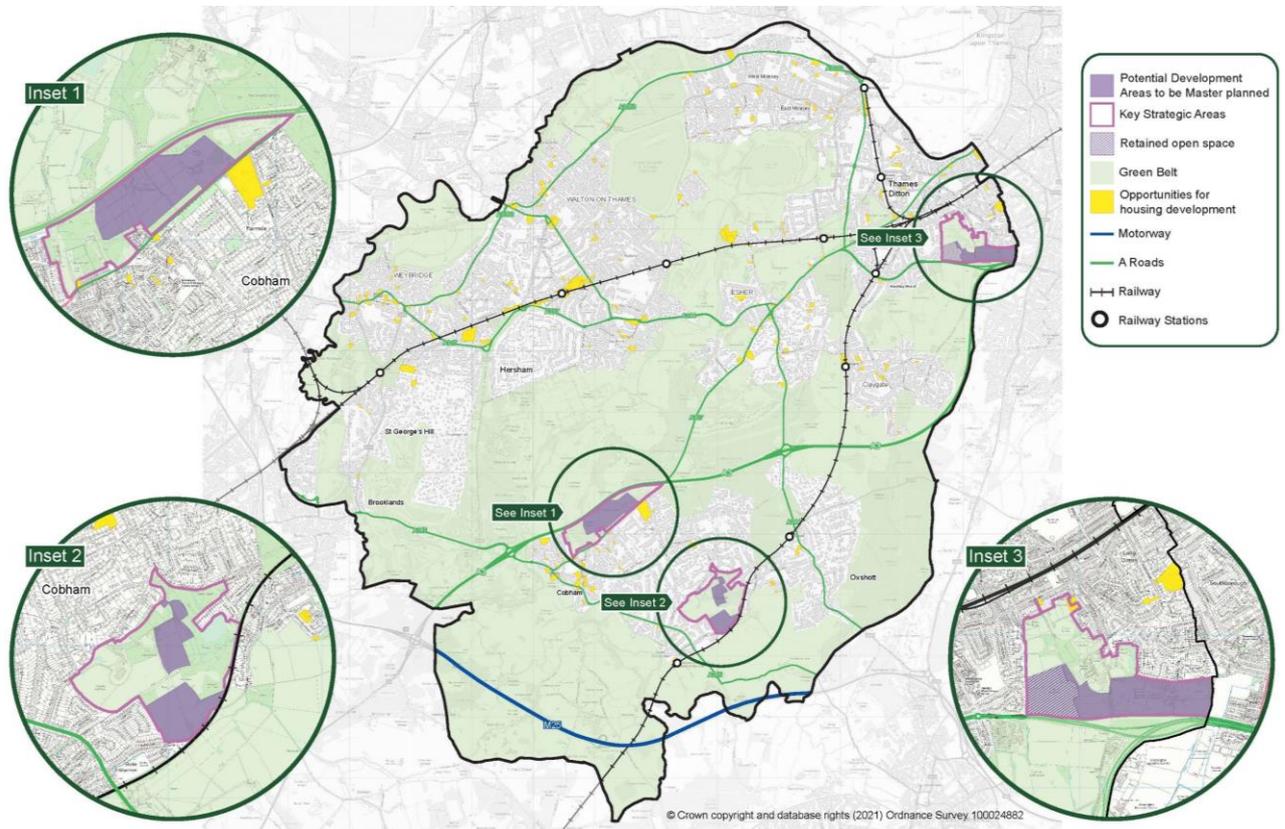
- Option 1 applied a blanket density of 85 dwellings per hectare to all LAA sites to estimate the density increase. This resulted in a total of 9,345.
- Option 2 used the urban sites from the LAA 2018 and units from the 3 key strategic areas, minus 10% for non-implementation. This resulted in a total of 6,800.
- Option 3 used the urban sites from the LAA 2018 and all Green Belt parcels from the evidence base documents and sites promoted, minus 15% for non-implementation. This resulted in a total of 16,300.
- Option 4 used just the urban sites from the LAA 2018. This resulted in a total of 5,300.
- Option 5 used urban sites from the LAA 2018 and 32 Green Belt sites that were considered available and deliverable at that time, minus 15% for non-implementation. This resulted in a total of 9,400.

3.42 The following maps show the exact location of the development for each of the 5 options. The urban sites presented at option 1 are shown in a deep yellow colour to indicate the intensification of sites with a blanket density of 85dph. The lighter yellow colour of the urban sites detailed in option 2, 3, 4 and 5 indicate that these sites will be optimised.

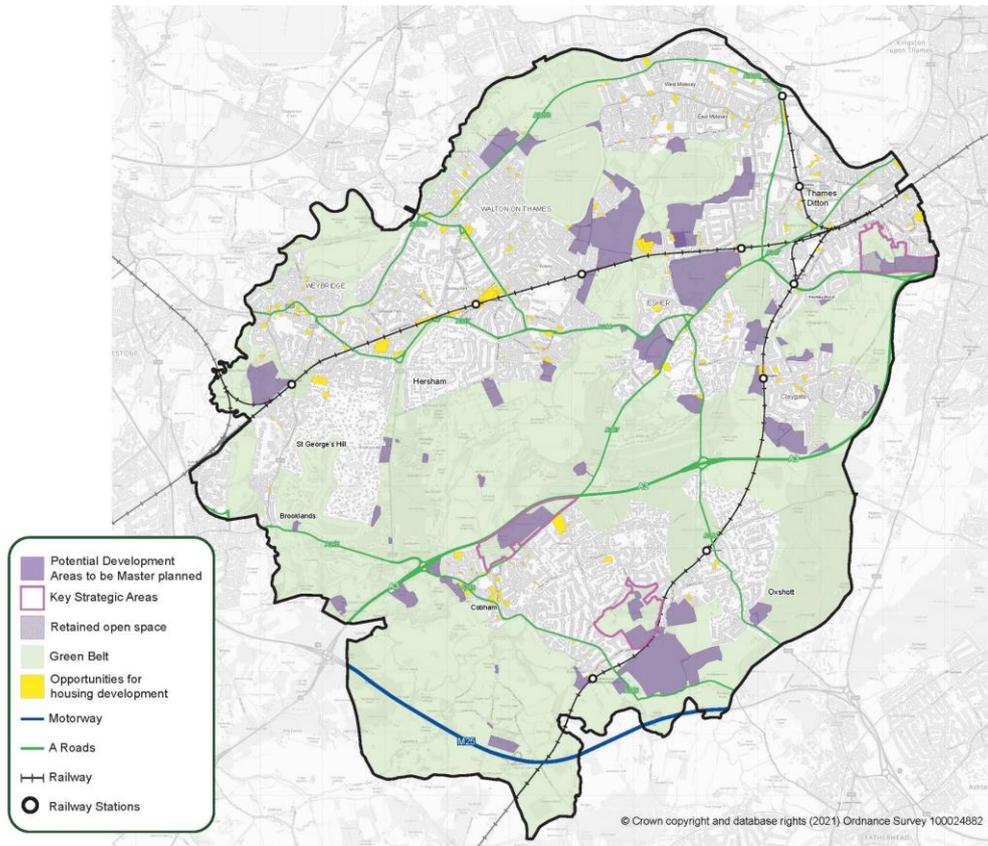
Map 2: Option 1 - Intensify urban area



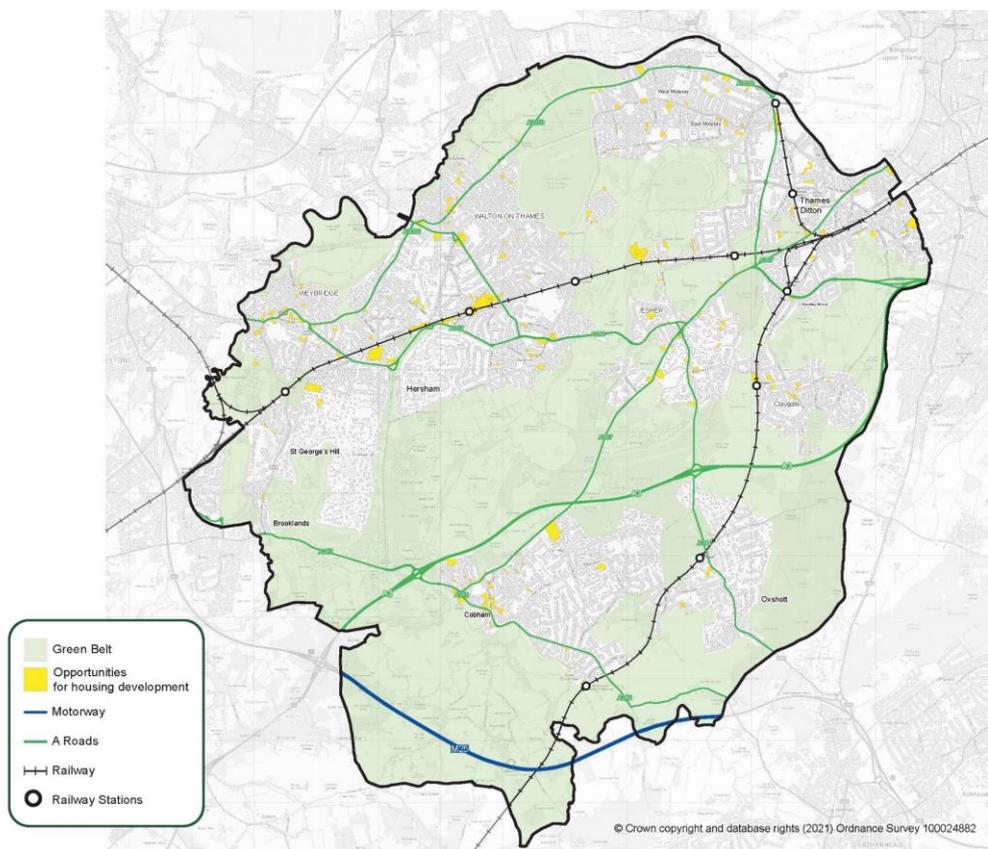
Map 3: Option 2 - Optimise urban area and 3 areas of Green Belt release



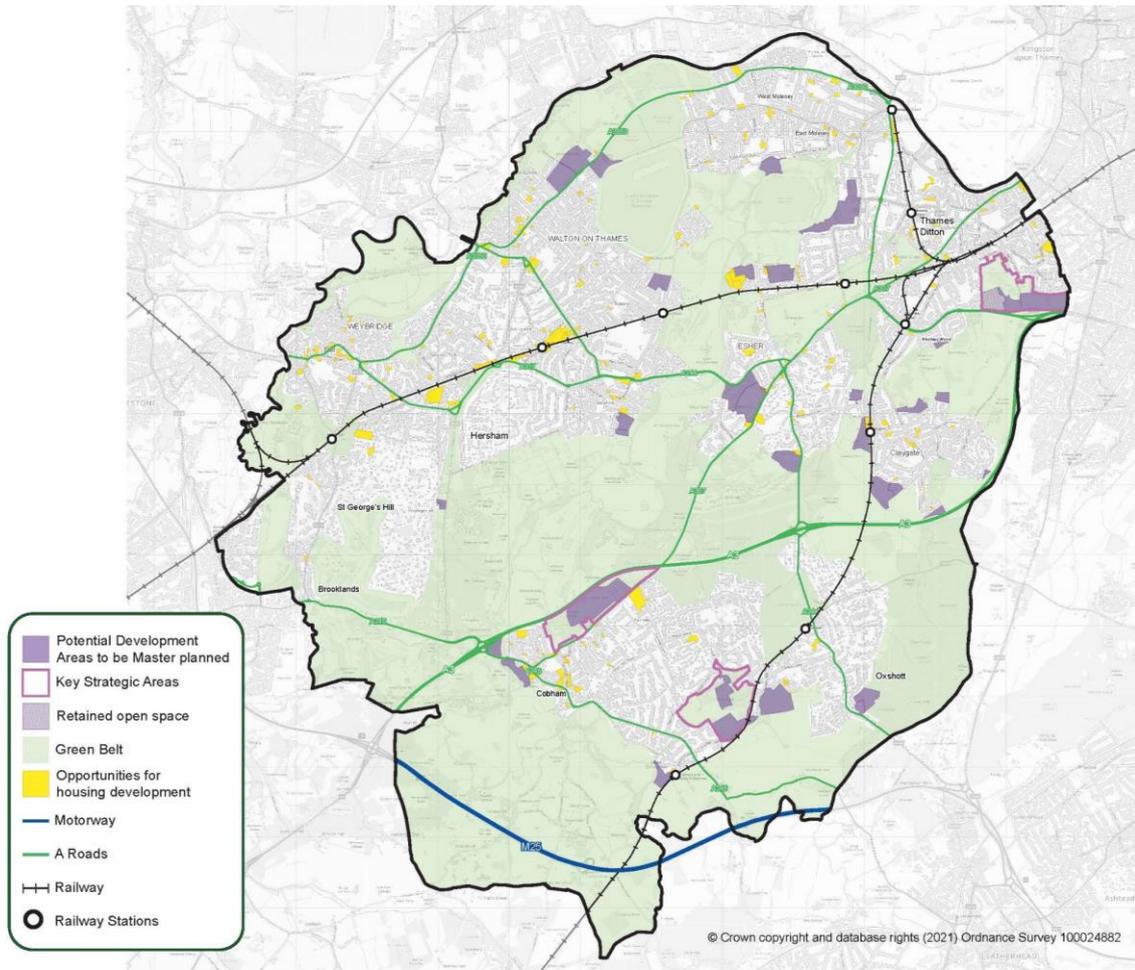
Map 4: Option 3 - Optimise urban area and large Green Belt release



Map 5: Option 4 - Optimise urban area



Map 6: Option 5/ Optimise urban area and small areas of Green Belt release



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3.43 Table 7 shows the results of the SA for the options consultation 2019. The detailed sustainability appraisals for each option are available to view in appendix 2 of the [Options SA](#).

Table 7: SA of 2019 Options

SA Objective	Option 1: Intensify urban area 9,345 homes	Option 2: Optimise urban area and 3 areas of Green Belt release 6,800 homes	Option 3: Optimise urban area and large Green Belt release 16,300 homes	Option 4: Optimise urban area 5,300 homes	Option 5: Optimise urban area and small areas of Green Belt release 9,400 homes
1. Homes	-	-	++	-	++
2. Health	0	+	+	?	++
3. Heritage	--	+	-	0	+
4. Accessibility	0	+	--	+	+
5. PDL	+	+	+	+	+
6. Economic growth	+	+	+	+	+
7. Employment	--	?	?	-	+
8. Energy Use	--	-	--	-	--
9. Natural Resources	-	-	--	-	-
10. Climate Change	-	+	+	-	+
11. Flooding	--	-	-	--	-
12. Water	?	?	?	?	?
13. Land	+	?	--	+	?
14. Pollution	--	-	--	-	-
15. Landscape	-	+	--	++	+
16. Biodiversity	-	+	--	+	-
Overall sustainability	-	+	--	+	+

3.44 Two SA objectives scores for the 2016 Strategic Options consultation differ from the 2019 SA results. This is because the Strategic Options consultation did not specify sites and number of homes. In 2016 it was considered that Option 2 would aim to meet housing need of 474 per annum, but by 2019 the housing need figure had changed to 623 per annum. Numbers and locations had also now been mapped and showed that Option 2 would not meet housing need in full. Additionally, it was considered difficult to provide custom homes and traveller pitches on the three key strategic Green Belt sites, hence Option 2 now scores a minor negative impact for the homes SA objective.

- 3.45 SA objective 2 (To facilitate the improved health and wellbeing of the whole population) also received a different result in the 2019 reappraisal. The commentary for both 2016 and 2019 is very similar, but because Option 2 would not meet the housing need in full and traveller pitches cannot be delivered for this option, the impact on health and wellbeing scores a minor positive rather than a significant positive result.

SA Results across the 5 options in 2019

- 3.46 Option 1 would deliver all the 9345 new homes within the urban area. However, it would require development to be built at high densities (85 dwelling per hectare) and could lead to high-rise housing developments. Even then, negative impacts are expected for housing as this option has few sites that could deliver affordable housing and smaller family homes. The option would protect the Green Belt but would change the character of the urban area, not only due to its high density building but also due to the use of urban green spaces and their relocation to the Green Belt.
- 3.47 Option 2 would not meet the borough's housing need in full, and so is not 'reasonable' according to the government's standard method for calculating housing need. However, by amending the Green Belt boundary, larger sites would be available for the delivery of affordable housing and smaller family houses. The option does mean some loss of the Green Belt land and would rely on other Local Planning Authorities to meet residual needs.
- 3.48 Option 3 would meet development needs in full by amending the Green Belt boundaries. Whilst the option would deliver a significant amount of affordable housing, it would fundamentally alter the character of the borough's towns and villages through coalescence, urban sprawl and encroachment of new development into the countryside. It has the most significant negative impacts of all the options presented: this is largely due to the impact of distributing development widely across the Borough.
- 3.49 Option 4 has a significant positive impact on protecting and enhancing the landscape character of the borough and has other minor positive impacts on the environment in terms of reducing the need to travel, making best use of previously developed land, reducing land contamination and conserving biodiversity. However, it does have a significant negative impact on flood risk and minor negative impacts on meeting housing need, reducing greenhouse gases, using natural resources, improving water quality and adapting to climate change.
- 3.50 Option 5 scores significant positive impacts in terms of meeting the local housing need in full, which in turn facilitates the improved health and wellbeing of the whole population. It scores minor positive results across six environmental objectives and all economic objectives. However, it receives significant negative impacts in terms of energy use and scores minor negative results for the use of natural resources, reducing flood risk, air quality/ pollution and conserving biodiversity.

Consultation feedback on the options

- 3.51 In terms of option 1, respondents considered that increasing the population in the urban area would put less pressure on the road network and would help to support local shops and centres. Others commented it was best for their area because it protected the Green Belt but delivered all the homes needed. Some said that high rise development was acceptable, loss of Green Belt would not be. Only 2% of respondents felt this option best suited their area.
- 3.52 Option 2 was viewed as a 'compromise' that would reach 'the best balance' delivering sustainable development on the Green Belt rather than 'squeezing' of additional development into centres. It was also an approach that would preserve current urban areas and distribute development across the borough. Only 2% of respondents felt this option best suited their area.
- 3.53 Those that thought option 3 was best for their area commented that it would distribute development over the borough, build needed new homes with space for gardens and off-road parking and space for future growth. Only 1% of respondents felt this option best suited their area.
- 3.54 The greatest support from participating respondents (85%) was for option 4 (urban optimisation), primarily as it proposed the lowest number of homes with no loss of open space or Green Belt land. Many commented this was option had the least impact for their area.
- 3.55 Respondents viewed option 5 as a 'compromise' and would lead to the 'least urbanising effect'. Some commented that it would result in a better use of urban areas but that some Green Belt should be used to build the new homes required. The option would also retain strategic gaps between settlements. Similar to comments made for options 2 and 3, option 5 would lead to a fairer distribution of new development and would protect urban areas of the borough from over development. 5% of respondents felt this option best suited their area.
- 3.56 In summary, only option 4 has community support but it does not meet the housing need. Option 5 will allow for SANG provision, but it includes 33 Green Belt parcels which the community does not support. Other comments suggested a combination of options, not meeting the housing figure, and that growth should happen elsewhere. None of these were considered reasonable as the council has an obligation to meet the borough's housing need not just the quantum but the types of homes needed for future generations. Additionally, option 5 already represents a combination of the options.

Status of options in late 2021

- 3.57 By mid-2021, the housing need figure had increased to 641 dwellings/year, or 9,615 over the plan period. This meant that options 1 and 5, which previously had met housing need, no longer did. Only option 3 would meet housing need in full.

- 3.58 From the very beginning of the development of the Local Plan, and throughout all regulation 18 consultations, the council has actively engaged with neighbouring authorities and those within the wider South East region, to see whether any other Local Planning Authorities could meet any of Elmbridge's potential unmet housing need. Since then, it has become apparent that due to their own constraints including Green Belt, AONB or current plan position, no local authority has the spare capacity to meet Elmbridge's unmet housing need. Therefore, options 2 and 4 are no longer reasonable.
- 3.59 Much of the residential development featured in all 5 options is likely to be located within 7km of the Thames Basin Heaths SPA (see para 2.16). The new residential units located in this area would, if not mitigated, increase the recreational pressure on the TBHSPA to the detriment of the habitat. The agreed mitigation is provision of Suitable Accessible Natural Greenspace (SANG), which attracts informal recreation users away from the TBHSPA, thereby reducing the recreational pressure. The [Habitats Regulation Assessment](#) 2019 that was undertaken for the Options consultation provided the SANG calculations for the 5 options. The results are shown in Table 8.
- 3.60 Table 8 shows that none of the options meets all of the following most significant criteria:
- Meets housing need in full
 - Does not need neighbouring authorities to help meeting Elmbridge's housing need
 - Does not require Green Belt release
 - Provides a site large enough for Suitable Accessible Natural Greenspace
 - Has public support

Table 8: Decision-making criteria for 2019 options

Criterion (most significant criteria in bold)	Option 1	Option 2	Option 3	Option 4	Option 5
Meets housing need (623 per year, total 9345)	Yes	No	Yes	No	Yes
Meets housing need (641 per year, total 9615)	No	No	Yes	No	No
Number of new homes	9,345	6,800	16,300	5,300	9,400
Can help neighbouring authorities to meet their housing needs	No	No	Yes	No	No
Does not need neighbouring authorities to help meet Elmbridge's housing need	Yes	No	Yes	No	Yes
Does not require Green Belt release	Yes	No	No	Yes	No
Amount of Green Belt release – ha (%)	0 (0%)	188 (3%)	2,920 (53%)	0 (0%)	366 (7%)

Green Belt boundaries remain fit for purpose	Yes	Yes	No	Yes	Yes
Overall sustainable (from Table 7)	No	Yes	No	Yes	Yes
Suitable accessible natural greenspace (SANG) requirement – ha from 2019 Habitats Regulation Assessment	14.7ha	30.7ha	118.3ha	14.9ha	37.1ha
Provides a site large enough for suitable accessible natural greenspace (SANG)	No	No	Yes	No	Yes
Does not require high densities, i.e. doubling current density rates	No	Yes	Yes	Yes	Yes
Optimises development sites	No	Yes	Yes	Yes	Yes
Does not require relocating open space into Green Belt	No	Yes	Yes	Yes	Yes
Includes larger sites	No	Yes	Yes	No	Yes
Community support from 2019 options consultation	No- 2%	No- 2%	No- 1%	Yes- 85%	No- 5%

New Options 2021

- 3.61 Further work on the land availability assessment (LAA) and sites was completed in 2021. The findings of the 2021 LAA resulted in a new total estimated capacity of housing units. This includes units under construction, site with planning permission minus a 10% non-implementation discount and the LAA sites with a 15% non-implementation discount applied which totals 6,988 units. Unlike the 2019 Options consultation, a windfall allowance¹¹ of 1007 units is also included. This results in a deficit of 2627 units. Taking account of the above limitations across all the options, three new options (4A, 5A and 6) have been developed and will help to inform the draft Local Plan strategy.
- 3.62 An additional option was also considered at this stage which consisted of reallocating Strategic Employment Land (SEL) for residential use. This option was previously regarded as unreasonable in 2016 as it was considered a valuable use which was contributing to the local economy and protected by current planning policy. Further evidence work has been carried out and the [2020 Local Market Appraisal](#) provided updated information about the demand for large office buildings as well as the need for warehousing and distribution uses. Although the report concluded that larger office units were not in as much demand and some were already being converted under permitted development rights, it was considered too early to consider reallocating SEL. For that reason, this option is still considered unreasonable in 2021 and will not be included in the following three options.

¹¹ Windfalls are sites that deliver 1 to 4 net dwellings. Historic delivery rates demonstrate that windfall development does consistently form a significant part of the housing land supply in the borough and is likely to continue to do so. There is also little sign of this reducing and figures have stayed consistent for the last ten years. The LAA includes a chapter explaining the evidence for the use of windfalls.

Option 4A

- 3.63 As explained above, Option 4 is no longer reasonable due to its reliance on neighbouring authorities to meet residual need. However, 85% of respondents from the 2019 Option consultation supported Option 4 as it would optimise densities, ensure effective use of the urban area and maintain existing Green Belt boundaries. Therefore, it is considered necessary to change this policy option based on Option 4. Further work on land availability and the inclusion of a windfall allowance (see paragraph 3.60) increased the percentage of housing need that could be delivered on urban land to 73% for Option 4a. There is strong political and community support for this option.
- 3.64 Although it does not meet housing need in full, it could be considered in compliance with national policy. Paragraph 11 of the NPPF states that housing needs should be met unless ‘the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area’. Green Belt is considered one of those assets (at footnote 7 of the NPPF) and a constraint to meeting this need in the borough.

Option 5A

- 3.65 It was important to undertake further work on the Green Belt sites for option 5 and make sure that the final sites selected were the most sustainable. To help determine which of the 33 sites in Option 5 are the least sustainable and so should be removed, all 33 sites were appraised using the scoring system described at appendix 5. Table 9 shows the SA results for all 33 sites and highlights the 12 sites that are now considered suitable for new option 5a. The detailed SAs are included in each site proforma in the Green Belt site selection evidence. Map 6 shows the location of 12 chosen sites, which are considered the most sustainable Green Belt sites with access to public transport and the potential to walk /cycle to local shops and services.

Table 9: SA of Green Belt sites in Option 5 (sites considered to be most sustainable, and so included in Option 5A, are shown in blue)

Sites	1.Homes	3.Heritage	4. Accessibility	5.Previously Developed Land	6. Economic Growth	7. Employment	11. Flooding	12.Water	13. Land	14.Pollution	15.Landscape	16.Biodiversity
GB1- Land NE of Waterside Drive, Walton	++	0	0	--	0	0	0	+	0	+	0	-
GB2- Land S of Ruxley Crescent, Claygate	+	0	-	--	+	0	0	+	-	0	-	--
GB3- Pains Hill Farm, Cobham	+	0	-	0	+	+	0	+	++	0	--	-
GB4- Land S of Randolph Close, Stoke D'Abernon	+	0	-	--	+	0	--	+	-	+	--	--
GB5- Esher Rugby Club, Walton	++	0	+	0	+	0	-	+	++	+	-	-
GB7- Land S of Arbrook House, Esher	++	-	0	0	+	0	0	-	++	+	--	-
GB17- Land NE of Horrington Farm, Claygate	+	0	0	0	+	0	0	+	-	-	--	-
GB18- Land N of Island Barn Reservoir	++	0	0	--	0	0	-	0	++	0	0	-
GB19- Land E of Danes Way, Oxshott	++	0	-	--	+	0	0	+	++	+	--	--
GB20- Hillview Nursery, Seven Hills Road, Walton	0	0	-	++	+	+	0	+	++	+	--	+
GB21- Land at Imber Court	++	0	0	0	+	0	0	+	++	+	0	-
GB23 – Land S of Waterside Drive, Walton	++	0	+	0	+	0	0	+	0	+	0	-
GB24- Land S of Esher Sewage Works, Esher	++	0	0	0	0	0	-	0	++	+	0	-
GB25- Land N of A309, Woodstock Lane N, Long Ditton	++	0	--	0	-	?	0	0	+	-	-	-
GB26- Land south of Holroyd Road, Claygate	+	0	-	--	+	0	0	+	-	0	--	--
GB27- Land E of Telegraph Ln, Claygate	+	0	0	--	+	0	-	+	+	+	-	--
GB29- Land W of Slough Farm	++	0	0	--	+	0	-	0	++	+	-	--
GB31- Land N of Woodlark Farm, Hersham	+	0	+	--	++	0	0	+	++	+	0	--
GB33- Land S of Hillcrest Gardens, Esher	+	0	0	--	+	0	0	+	++	+	--	--
GB35- Land E of Claygate House	+	0	+	0	+	0	-	+	++	+	0	-
GB41- Land NW of	++	0	0	--	0	0	0	+	++	0	-	-

Sites	1.Homes	3.Heritage	4. Accessibility	5.Previously Developed Land	6. Economic Growth	7. Employment	11. Flooding	12.Water	13. Land	14.Pollution	15.Landscape	16.Biodiversity
Queen Eliz. II reservoir, Walton												
GB42- Land NW of Anvil Lane, Cobham	+	-	0	--	+	0	--	+	++	+	-	--
GB46- Land E of Blundel Lane & S of Waverley Rd	++	0	-	--	0	0	0	+	-	+	-	--
GB48- Land W of Stoke D'Abernon train station	0	-	-	0	0	0	--	+	-	+	-	-
GB49- Land S of Lammas Lane	++	0	0	0	++	0	0	0	++	+	0	-
GB50- Land at Arran Way, Esher	++	?	+	--	+	-	-	0	++	+	0	--
GB51- Land at Hersham Golf Course	++	0	+	0	+	?	-	+	--	+	--	-
GB58- Horrington Farm, Claygate	++	-	-	0	+	0	0	+	++	+	--	-
GB62- Land at and S of Burhill School, Hersham	+	0	++	0	++	0	0	+	++	+	0	-
GB63- Loseberry Farm, Claygate	++	0	+	0	+	0	0	+	+	+	--	-
GB64- Land at Moore Place Golf Course, Esher	++	-	0	0	+	0	0	+	++	+	0	-
GB65- Land at Chippings Farm & Fairmile, Cobham	++	-	0	--	0	?	0	+	--	0	-	-
GB67- Land W of Blundel Lane, Cobham	++	0	-	--	0	0	0	+	-	+	--	-

The following sites were also added to the list because information became available about the sites' availability during the 2019 consultation.

Sites	1.Homes	3.Heritage	4. Accessibility	5.PDL	6.Economic Growth	7.Employment	11. Flooding	12.Water	13. Land	14. Pollution	15. Landscape	16.Biodiversity
Café Rouge and land to north, Esher	+	-	+	--	+	0	0	+	++	+	--	--
Weylands Old Treatment Works ¹²	0	0	0	0	++	+	0	0	++	+	0	-

¹² The site has been identified within the Surrey Waste Local Plan 2019-2033 as a way of meeting an identified shortfall in waste management capacity in the County. Subject to other considerations, exceptional circumstances exist to enable the site's release from the Green Belt.

Map 7: Map to show 33 sites under option 5 and 12 site locations for option 5a.

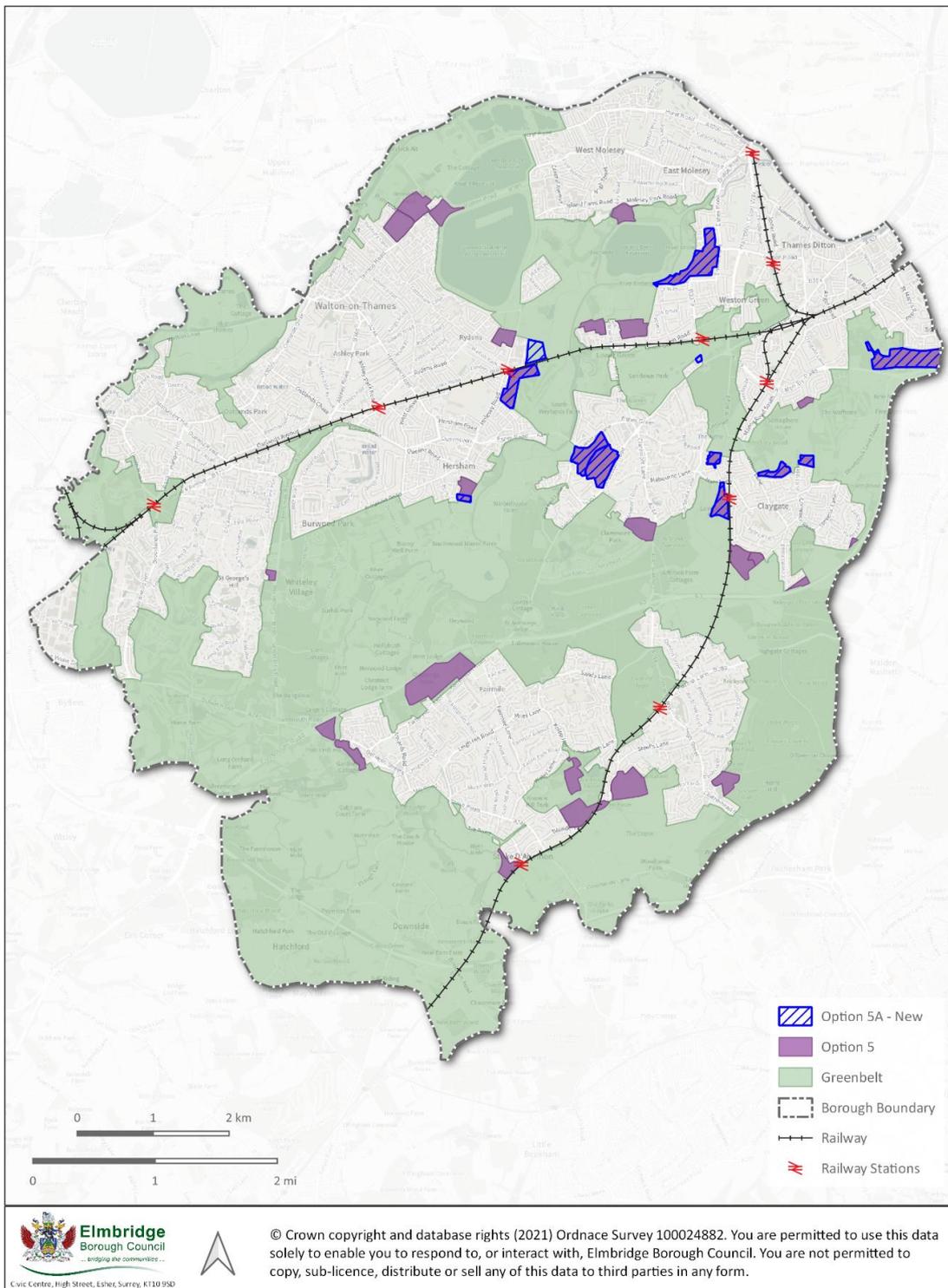


Table 10: SA results for Option 5a sites

Sites	1.Homes	3.Heritage	4. Accessibility	5.Previously Developed Land	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14.Pollution	15.Landscape	16.Biodiversity
GB21- Land at Imber Court	++	0	0	0	+	0	0	+	++	+	0	-
GB25- Land N of A309, Woodst. Ln N, Long Ditton	++	0	--	0	-	?	0	0	+	-	-	-
GB27- Land E of Telegraph Ln, Claygate	+	0	0	--	+	0	-	+	+	+	-	--
GB29- Land W of Slough Farm	++	0	0	--	+	0	-	0	++	+	-	--
GB31- Land N of Woodlark Farm, Hersham	+	0	+	--	++	0	0	+	++	+	0	--
GB35- Land E of Claygate House	+	0	+	0	+	0	-	+	++	+	0	-
GB49- Land S of Lammas Lane	++	0	0	0	++	0	0	0	++	+	0	-
GB51-Land at Hersham Golf Course	++	0	+	0	+	?	-	+	--	+	--	-
GB63- Loseberry Farm, Claygate	++	0	+	0	+	0	0	+	+	+	--	-
GB64- Land at Moore Place Golf Course, Esher	++	-	0	0	+	0	0	+	++	+	0	-
GB55- Café Rouge and land to north, Esher	+	-	+	--	+	0	0	+	++	+	--	--
Weylands Old Treatment Works, Walton	0	0	0	0	++	+	0	0	++	+	0	-
Total of sites	++	0	0	-	++	0	-?	+	++	+	-	--

3.66 These sites form the basis for a new Option 5a, which is appraised at Table 11.

Option 6

3.67 This option includes all the sites in the LAA 2021 but increases densities for those urban sites located in the town and village centres as well as any sites close to the borough's railway stations. This is in accordance with paragraph 130 of the NPPF which aims to ensure significant development is focused on locations which are or can be made sustainable. It is quite different from the former option 1 to intensify the urban area because it does not include land swapping of urban greenspace and does not use a blanket density across all

urban sites. The evidence supporting this option has found that 9619 dwellings can be delivered.

Table 11: SA of options 4a, 5a and 6.

SA Objective	Option 4a: Urban area only Using sites from LAA 2021 with non-implementation discount applied 6988 homes	Option 5a: Urban area and 12 small parcels of G/B Using sites from LAA 2021 with non-implementation discount applied and 12 sites from the Green Belt. 9328 homes	Option 6: Urban area and intensify development around town and village centres and train stations. 9689 homes
1. Homes	--	+	-
2. Health	+	+	+
3. Heritage	?	?	?
4. Accessibility	+	+	++
5. Previously developed land	+	+	++
6. Economic growth	?	?	?
7. Employment	-	-	-
8. Energy Use	-	-	-
9. Natural Resources	-	-	-
10. Climate Change	-	+	-
11. Flooding	-	-	-
12. Water	-	-	-
13. Land	+	-	+
14. Pollution	-	-	-
15. Landscape	++	-	++
16. Biodiversity	+	-	+

3.68 Option 4a meets 73% of the housing need and will deliver housing on smaller sites in the urban area. This will result in a significant negative impact for the homes SA objective as this option will not meet the housing need or the mix required. Although development in the urban area will facilitate flexible working practices and encourage mixed use development, the demand for land will also impact employment uses which could impact employment opportunities. There are several minor negative impacts

expected for the environmental SA objectives that relate to the increase in growth however focussing development in the urban area will protect and enhance landscape character and biodiversity.

- 3.69 Option 5a is 19 dwellings short of meeting the housing need but larger Green Belt sites allow for a mix of housing to be delivered and most importantly the affordable housing need to be met and the undersupply. This results in a minor positive score for the homes SA objective. It scores a minor negative result for employment opportunities as no land is being allocated to provide employment opportunities. Minor negative impacts are expected for many other environmental SA objectives as development on greenfield sites would impact land quantity, landscape and biodiversity. However, the size of sites released from the Green Belt would allow for larger climate change alleviation schemes, biodiversity net gains and green infrastructure provision.
- 3.70 As option 6 contains the same urban sites as option 4a, the results of the SA are similar. However, major positive impacts are expected for the accessibility SA objective as development will be intensified in the most sustainable urban areas, which would reduce future occupants need to travel, encourage sustainable transport options and improve accessibility to key services and facilities. Even though this option would meet housing need in full, the size of urban sites means that flats will dominate, and this would not provide the mix of housing required. Therefore, a minor negative impact for the homes SA objective is expected for this option.
- 3.71 All three options score an unknown result for the heritage SA objective as it is unknown whether any of the future development proposals will enhance historic assets at this early stage. Unknown scores are also given to SA objective 6: Economic growth as all three-options support economic growth but do not allocate land due to the uncertainty in the market for premises.

Further revisions 2022

- 3.72 On 23 March 2022, the Local Housing Need (LHN) figures changed. Derived from the Government's standard method, a need of 647 dwellings per annum in Elmbridge was identified. This calculation of housing need uses the household projections for the period 2022 – 2032 (from the 2014 projections) and applies the affordability ratio. This has an impact on the 3 options and their ability to meet the LHN.
- 3.73 In addition to changes to the LHN, the land availability assessment has also been updated with some sites being removed, some granted planning permission, and some added which affects the housing numbers in the draft Local Plan. Therefore, Table 11 has been updated to reflect the new sites numbers taken from the LAA 2022. The SA results are shown in Tale 11a.

Table 11a: SA of options 4a, 5a and 6.

SA Objective	Option 4a: Urban area only Using sites from LAA 2022 with non- implementatio n discount applied 6787 homes	Option 5a: Urban area and 12 small parcels of G/B Using sites from LAA 2022 with non- implementation discount applied and 12 sites from the Green Belt. 9182 homes	Option 6: Urban area and intensify development around town and village centres and train stations. 9689 homes
1. Homes	--	-	-
2. Health	+	+	+
3. Heritage	?	?	?
4. Accessibility	+	+	++
5. Previously developed land	+	+	++
6. Economic growth	?	?	?
7. Employment	-	-	-
8. Energy Use	-	-	-
9. Natural Resources	-	-	-
10. Climate Change	-	+	-
11. Flooding	-	-	-
12. Water	-	-	-
13. Land	+	-	+
14. Pollution	-	-	-
15. Landscape	++	-	++
16. Biodiversity	+	-	+

3.74 One change to the above is that Option 5a has now scored a negative impact for homes because this option would fall short of the LHN figure by over 500 units. Although a greater mix of housing may still be delivered for this option, the shortfall in meeting the need is significant enough to warrant a negative impact unlike the previous SA which had a shortfall on 19 units for the same option.

3.75 These three options have informed the strategy for the borough's housing and growth policy. Following the recommendations made at the Local Plan Working Group (LPWG) on 13 January 2022, a draft Local Plan, which is based on the intensification of the urban area (Option 4a) has been approved

at Cabinet and Council in March and June 2022. Therefore, the SA report now considers a draft Local Plan based on option 4a, which is a preferred strategy based on the intensification of the urban area.

Other policies with reasonable alternatives explored.

SS1: Responding to the climate change emergency

3.76 Responding to climate change was considered an important issue in all 3 regulation 18 consultations¹³ and many respondents stated that the Local Plan must include policies that ensures new development adapts to climate change.

3.77 Even though the draft Local Plan contains a number of detailed policies on specific climate change matters such as managing flood risk; biodiversity; energy efficiency, renewable and low carbon energy; and air quality, it was considered important to have an overarching strategic policy that sets the main aim and provides the criteria needed to address in developers submission documents. The following sets out the alternatives that have been assessed.

1. To include a policy that sets out how development must respond to climate change with criteria that supports this aim.
2. To include a more stringent policy that requires development to meet a target above that of building control to reduce carbon dioxide emissions including a responsibility for developers to report and monitor the progress for a set period of time.

Table 12: Summary of the SA results of SS1

	1. Homes	2. Health	3. Heritage	4. Transport	5. Previously Developed Land	6. Economic Growth	7. Employment	8. Energy use	9. Natural Resources	10. Climate Change	11. Flooding	12. Water	14. Pollution	16. Biodiversity
1	-	+	+	+	+	+	+	+	+	+	+	+	+	+
2	--	++	++	++	++	++	+	++	++	++	+	++	+	+

3.78 Alternative option 2 scores the best results across all environmental objectives because it includes targets that will ensure adaption schemes are achieved. This will have a significant positive impact on responding to climate change. However, the cost of meeting the targets will impact on the viability of schemes and could result in other policy objectives being

¹³ Strategic Option consultation 2016, Options Consultation 2019 and The Vision consultation 2020.

comprised such as affordable housing and community infrastructure. Therefore, a significant negative is expected for SA objective 1: Homes.

3.79 Alternative option 1 is preferred it will ensure developers provide mitigation and adaption to climate change in their schemes but could be flexible in terms of how this is delivered. Like alternative 2, this will have a negative impact on the amount of homes delivered due to viability, but it does strike the balance between providing affordable homes and responding to the climate change emergency. Appendix 3 provides the full SA for SS1 and explains the findings in more detail.

SS2: Sustainable place-making

3.80 All three regulation 18 consultations received comments relating to local distinctiveness and the protection of character for the borough’s individual settlements. Therefore, it was important to develop a policy that builds on the success of existing communities and places and responds to their individual identities and development needs. As this approach could differ from previous policies on design and character, the following reasonable alternatives were tested:

1. Include a policy that establishes the principles for development in Elmbridge; reflects the vision and principles of the Plan; and sets the context for the detailed policies in the remainder of the Plan.
2. Include a policy that encourages strong local distinctiveness and requires developments to have regard to the local character and context. It would refer to specific density figures like that in the existing Core Strategy.
3. Do not include a policy on place shaping. Have a more flexible approach to the design of the built environment and surrounds. Rely solely on the National Planning Policy Framework and the national design guide.

Table 13: Summary of the SA Results of SS2

	1. Homes	2. Health	3. Heritage	4. Transport	5. PDL	6. Economic Growth	7. Employment	8. Energy use	9. Natural Resources	10. Climate Change	11. Flooding	12. Water	13. Land	14. Pollution
1	+	+	+	+	+	+	+	+	+	+	+	+	+	+
2	-	-	++	0	-	0	0	0	0	0	0	0	+	0
3	0	0	0	+	+	0	0	0	0	0	0	0	0	0

3.81 Alternative 1, the preferred draft policy, will ensure that all planning decisions will have regard to the overall aims of the Plan and contribute to achieving the vision for Elmbridge 2037 as well as creating greater synergy with

national planning policy and the national design guidance. It scored minor positives across all social, economic and environmental SA objectives.

- 3.82 Alternative 2 was rejected as this would be too detailed and would be better suited to the Local Design Code. Prescribed policies on local distinctiveness and densities can also restrict the efficient use of land, which could impact negatively on meeting housing needs.
- 3.83 Alternative 3 was also rejected as this approach would limit the extent to which development takes account of the local context and the vision and principles important to Elmbridge. Appendix 3 provides the full SA for SS2 and explains the findings in more detail.

ENV6: Protecting, enhancing and recovering biodiversity

- 3.84 Respondents from the vision consultation (2020) also felt strongly that the council should be protecting and enhancing biodiversity. The government’s Environment Act promotes biodiversity net gain, where any reduction in biodiversity as a result of development is more than balanced out by improvements to biodiversity elsewhere. The Environment Agency stated that they would support a minimum 20% target (or the standard minimum, whichever is greater) for biodiversity net gain, and the use of Natural England’s Biodiversity Metric 2.0 as a way of measuring and accounting for losses and gains.
- 3.85 The draft policy expects development proposals to lead to a net gain in biodiversity of a minimum of 10% on all sites by means of an approved ecological assessment of existing site features and development impacts. This percentage is required in the Environment Act. The policy states that biodiversity must be provided and maintained.
- 3.86 The alternative looked at providing a higher amount of biodiversity, to respond to the Environment Agency’s consultation feedback.

Table 14: Summary of the SA results for ENV6

	1. Homes	2. Health	6. Economic Growth	7. Employment	8. Energy	10. Climate Change	12. Water	16. Biodiversity
Draft Policy	?	+	0	0	+	+	+	+
Alternative	-	+	-	-	++	++	++	++

- 3.87 Even though the alternative has the most significant positive impacts across four environmental SA objectives, it has minor negative impacts across social and economic SA objectives. The higher percentage of biodiversity net gain may make the development unviable which would impact on the ability to deliver these positive environmental sustainability objectives.

3.88 The preferred draft policy for biodiversity strikes the balance between social, economic and environmental benefits. This appears to be the most reasonable of alternatives and the most sustainable across the duration of the plan. Please see appendix 3 for the detailed SA for policy ENV6.

B3: Evaluating the likely effects of the draft Local Plan.

- 3.89 This step takes in the most significant element of the sustainability appraisal process, of assessing the likely effects of the draft Local Plan. The strategic, detailed and site allocations policies have been assessed against the 16 sustainability objectives, where relevant. The detailed assessments can be found at appendix 3.
- 3.90 For each appraisal, a written commentary has been included to explain and justify the scoring. The original decision aiding questions for each SA objective is included in appendix 3 of the scoping report 2020.
- 3.91 The table below summaries the results of all the strategic and detailed policies only. Grey shaded boxes in the table below means that the policy is not relevant to the SA objective. If the grey shaded box has a question mark, this means that it is unclear whether there is potential for a negative or positive effect on the SA objective.

Table 15: Appraisal results of all plan policies

Plan Policy	1. Homes	2. Health	3. Heritage	4. Accessibility	5. PDL*	6. Economic Growth	7. Employment	8. Energy use	9. Natural Resources	10. Climate Change	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
SS1	0	+	+	+	+	+	+	+	+	+	+	+		+		+
SS2	+	+	+	+	+	+	+	+	+	+	+			+	+	+
SS3	-	+	?	+	+	?	-	-	-	-	-	-	+	-	++	+
CC1	0	+				+		++		++						
CC2		+						+	++	+		+	+			
CC3		+						+	+	++		++				
CC4		+		+		+	+	+		+				+		
CC5		+				0	0			+	+					
ENV1		+	+	+		+		+	+	+	+	+	+	+	++	++
ENV2		+								+	+				++	++
ENV3		+		+		+	+			+	+			?	++	?
ENV4															+	

Plan Policy	1. Homes	2. Health	3. Heritage	4. Accessibility	5. PDL*	6. Economic Growth	7. Employment	8. Energy use	9. Natural Resources	10. Climate Change	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
ENV5																+
ENV6	?	+				0	0	+		+		+				+
ENV7		+							+	+		+	+	+		+
ENV8		+		+				+		+				++		+
ENV9		++	++	+		+									+	
ENV10		+	++			+										
ENV11			++												++	
HOU1	--	0	?	+	+	+	+	-	-	0	0	0	+	-	++	+
HOU2	+	+	?	+	+	+	+	+					+	+	+	+
HOU3	+	+				+	+							+		
HOU4	+	+														
HOU5		++		++						+						+
HOU6	+	+														
HOU7	+	+														
HOU8	+	0														
ECO1		+	?	+	+	+	+									
ECO2	-	+			++	+	+									
ECO3	+	+	?	+	++	+	+	+					+	+	+	
ECO4	0	+	?	+	+	+	+			?		?				
ECO5		+			+	+	+								+	+
INF1	0	+		+							+	+		?		
INF2		++														
INF3		++		++												
INF4	?	++		+												
INF5		+		++		+	+	+		+				+		
INF6		+	+	+		+	+								++	+

*Previously Developed Land

3.92 The table above shows that the draft Local Plan has many positive effects as it balances the need to protect the environment, support development and growth and provides the infrastructure needed to do this. The appraisals have been assessed based on the policy's likely effects against the current situation and therefore positive impacts are expected if improvements will be made rather than protecting what already exists. If that is the case neutral impacts will be expected.

Overview of Strategic Policies

- 3.93 SS1 aims to address the climate emergency by minimising carbon emissions and supporting the transition to a low carbon future. It also aims to deliver improvements to flood risk, air quality, recycling and waste management. Positive results are scored as the policy intervention will improve the existing situation. A neutral impact is expected for providing sufficient housing as cost implications have been considered in the Viability Assessment 2022 and should not impact housing delivery.
- 3.94 SS2 (Sustainable Placemaking) scores positive results across the social, economic and environmental policies as its fundamental aim is to balance economic, social and environmental objectives and reflects the vision and principles of the plan.
- 3.95 SS3 scores one significant and four minor positive impacts for the environmental SA objectives as well as one minor positive for the social and economic SA objectives. This is a result of focussing development in the urban area, which will protect the borough's landscape setting, biodiversity and land quantity.
- 3.96 This is a balance and SS3 does score eight minor negative results and one significant negative for the SA homes objective. Due to the small-scale nature of urban sites in the borough, a mix of housing types is difficult to achieve and competition for housing may impact economic land uses. In terms of the environment, any increase in growth will result in greater use of resources and pollution but the lack of larger sites for development could impact on the borough's ability to provide larger climate change reduction projects and flood alleviation schemes for example.

Overview of Detailed Policies

- 3.97 Positive impacts are expected for all climate change detailed policies across many of the social and environmental SA objectives. There are no negative impacts expected to warrant mitigation however there is a neutral impact expected for the homes objective for the energy policy (CC1) because the viability evidence suggests that residential development can still come forward viably despite additional costs from carbon reduction measures. CC5 also scores some neutral scores for protecting businesses from flood risk in the short term but will have positive impacts in the long term as flood protection is ensured and smaller scale alleviation projects are delivered.
- 3.98 The environmental detailed policies score positive impacts with no negative impacts expected. There is an unknown impact expected on providing enough housing because this depends on the amount of costs required for the protection and enhancement of biodiversity in the individual scheme. There is also a question mark regarding the impact of biodiversity and pollution in the policy on local green spaces (ENV3) which states that limited built development will be allowed where it would support the function of the

local green space. This is because land management and enhancements could result in negative or positive impacts on the biodiversity of a site and potentially cause light and noise pollution, depending on what use is proposed (access paths for example). The level of function has the potential to impact biodiversity and pollution but currently this is unknown.

- 3.99 Much of the housing detailed policies score positive results for SA objective 1 to provide enough housing and SA objective 2 to improve the health and well-being of the population because they aim to deliver homes. However, HOU1 scores a significant negative for homes as it does not meet the housing need in full so will not significantly boost the supply of housing.
- 3.100 The economic detailed policies result in one negative impact for providing enough housing due to the importance of maintaining Strategic Employment Land. However, policy ECO3 does promote the use of housing above shops and services in the borough's town, district and local centres. The other economic policies are positive across health, accessibility, economic growth, employment and the use of previously developed land.
- 3.101 Infrastructure detailed policies are all positive with only one question mark for policy INF4 (Play and informal recreation space) on providing sufficient housing SA Objective 1. This is because it will depend on the scheme and the amount of policy objectives (such as carbon reduction, affordable housing need and community infrastructure) required to ensure its viable delivery. This will depend of the site's individual viability assessment and whether this obligation will impact on housing delivery.

Site allocations

- 3.102 The Sustainability Appraisals for the site allocations employed 12 of the 16 SA objectives. The objectives below have not been included in the site appraisal because they are all considered at strategic plan making level.
- SA Objective 2: To facilitate the improved health and wellbeing of the whole population.
 - SA Objective 8: To reduce greenhouse gas emissions and move to a low carbon economy.
 - SA Objective 9: To use natural resources prudently.
 - SA Objective 10: To adapt to the changing climate.
- 3.103 The detailed information of how the sites have been scored is explained in the Land Availability Assessment 2022.

Sustainability impacts of the Local Plan site allocations

- 3.104 There are 199 urban sites allocated in the draft Local Plan. Individual proformas for each site are available to view in the LAA 2022. The proformas

are not repeated in full in this report but are presented in a summary table at appendix 4 for each settlement.

- 3.105 Minor and some significant positive impacts are expected for housing across all the urban sites. There are four neutral scores where no housing is proposed as the potential use for the site is solely employment.
- 3.106 The heritage SA objective is mainly neutral across the settlements as there would be no impact on archaeological, historic and cultural assets. However, many sites are located close to or contain heritage assets. These score an unknown result as it is difficult to say whether future development will have a positive or negative impact on the asset.
- 3.107 Where public transport, schools, medical centres and green spaces are located over 1.2km from the site, a minor negative impact is expected. This affects 11 sites across the settlements with two significant negative impacts expected in Cobham. All sites in Hersham, Esher and the Dittons have no negative impacts expected for accessibility.
- 3.108 190 urban sites score significant positive results for making the best use of previously developed land. Nine sites score neutral results as they contain a mix of PDL and greenfield.
- 3.109 There are only two negative impacts expected for economic growth due to the sites' distance to employment centres. The employment SA objective does score significant negative impacts for some sites that propose a total loss of employment. This affects sites in nearly every settlement of the borough apart from Molesey.
- 3.110 There is a mix of flooding scores across the sites. Claygate and Hersham are the only settlements that are expected to have no negative impacts on this SA objective. There is only one negative impact expected for water quality in the Dittons, which is due to a water course bordering the site.
- 3.111 All sites are expected to have neutral or major positive impacts for reducing land contamination and safeguarding soil quality and quantity. Significant negative impacts are expected for those sites located in an existing air quality management area and this affects settlements Weybridge, Walton-on-Thames, Molesey, Dittons and Esher.
- 3.112 Most of the urban sites will protect and enhance the landscape character, however there are sites that score a minor negative impact due to their location next to a green space. This affects the biodiversity SA objective where the site neighbours a biodiversity opportunity area for example.

Overall Impacts of the Plan

- 3.113 Taking into account the above scores for the strategic, detailed and site allocations draft policies, table 16 shows the plan's overall impacts on the 16 social, economic and environmental sustainability objectives. It is clear from

the table that an urban only plan has positive impacts for many social, economic and environmental SA objectives.

Table 16: Total Plan impacts

SA Objective	Score	Impacts
1. Homes	--	The draft plan does not meet the housing need in full and will include smaller scale site allocations in the urban area which is likely to impact on the delivery of the mix of housing, particularly affordable housing.
2. Health	+	Many of the draft plan's policies will assist in supporting strong, vibrant, inclusive, safe and healthy communities. They encourage environmental improvements such as the promotion of sustainable travel methods, providing green and blue infrastructure links, play space, protecting and enhancing biodiversity and the borough's heritage assets. All of these will improve the health and well-being of the whole population.
3. Heritage	+	The heritage policies, alongside the urban design policy, will protect and could enhance the borough's historic environment, which is likely to have a positive impact on this SA objective. Even though it is too early for detailed planning submissions for the site allocations, policies ENV9, 10, 11 will ensure the borough's heritage assets and settings are conserved and enhanced.
4. Accessibility	+	The draft plan directs development towards locations that minimise the need to travel and maximises the ability to make trips by sustainable modes of transport including cycling, walking and public transport. Some sites score a negative result due to being located further away from service centres and public transport, but this only affect 13 of the 199 sites. The draft plan aims to optimise development in sustainable locations which will reduce per person car use, reduce congestion and improve accessibility to key services and green infrastructure.
5. Previously Developed Land (PDL)	+	The draft plan focusses new development on PDL located in the urban area for housing and employment sites. It is generally located in sustainable locations close to existing services and facilities which reduces the need to travel. This in turn helps to reduce congestion and improve air quality. This cannot score a significant positive as PDL land is limited and could run out in the long term.
6. Economic Growth	+	Supporting the borough's existing economy is the main aim of the policies on economic growth in the draft plan. A safeguarding approach that maintains and intensifies the existing employment offer in the borough is encouraged. This will allow space and opportunities for existing companies to grow and new ones to start. The policies also encourage flexible and adaptable units that will reflect the needs of the borough's changing office market. The draft plan also supports additional uses in the borough's town, district and local centres to ensure these centres are maintained and enhanced. Positive impacts are expected for 197 allocated sites.

7. Employment	+	The draft plan will make provision for the delivery of a range of business and employment floorspace including modern, flexible and well-connected workspaces to increase employment opportunities for residents. Although it allocates urban sites that would result in a total loss of employment use, the employment policy's aim is to intensify strategic employment sites and better use the existing employment land located in the borough.
8. Energy Use	+/-	Improving the quality of the built environment and energy performance of new and existing buildings is a fundamental aim of the draft plan. However further growth and development will increase greenhouse gas emissions.
9. Natural Resources	+/-	The draft Local Plan encourages the use and supply of sustainable local products and services and policy CC2 aims to minimise waste and promote a circular economy. However, ultimately meeting the housing need within the urban area will increase the production of waste and it will prove a challenge to use natural resources prudently.
10. Climate Change	+/-	The draft plan plays a central role in addressing the climate emergency by reducing carbon dioxide emissions and supporting the transition to a low carbon future. As well as delivering improvements to flood risk, air quality, recycling and waste management, new development will need to positively respond to the climate emergency and deliver a comprehensive and integrated approach to addressing the challenges of climate change.
11. Flooding	+/-	The draft plan has a robust policy to manage flood risk and seeks to minimise vulnerability to flooding. There are urban sites that are located in flood risk 2 and / or have surface water flooding issues to mitigate.
12. Water	+/-	The draft plan includes a strategy that aims to mitigate and adapt to the impacts of climate change by conserving water resources. It intends to help improve biodiversity, use natural resources prudently and minimise pollution all of which will help improve water quality. However, an increase in population from new housing will require a larger water supply.
13. Land	+	The draft plan being urban only will protect good quality soil and prevent soil erosion. Many of the proposed allocated sites have the ability to remediate contaminated land.
14. Pollution	+/-	The draft plan aims to reduce carbon emissions by minimising the need to travel by private motorised vehicles and maximising more sustainable modes of transport. It also states that the council will seek to reduce air pollution. With greater access to electric vehicles, air quality should significantly improve in the medium and long term. There are a number of sites that neighbour an AQMA where mitigation will be required
15. Landscape	++	The draft plan policies seek to ensure that new development is well designed and of a high quality, and that existing character landscapes are protected. All allocated sites will protect the landscape setting of the borough.
16. Biodiversity	+	There is a draft policy to enhance biodiversity and positive impacts are seen across many of the environmental detailed policies. All allocated sites are located in the urban area with no complete greenfield sites being allocated, which will protect existing biodiversity.

Secondary or indirect effects

3.114 These are effects that are not a direct result of the draft Plan but occur away from the original effect as a result of a complex pathway. Key indirect effects of the draft Local Plan include:

- The increase in housing in and neighbouring the borough's town, district and local centres could improve the vitality and viability of these centres and encourage businesses to start up and grow.
- Provision of new dwellings on sites in the urban area only will protect agricultural land, water quality, landscape setting, biodiversity and heritage assets that are located outside the urban area.
- Optimising housing density on sites adjacent to train stations and near existing town, district and village centres would reduce the need to travel and have associated benefits for health and air quality.
- Small scale urban development could result in piecemeal development in the borough and could impact on the delivery of adequate infrastructure and services.
- Affordable housing units might not be delivered on smaller sites in the urban area.

Cumulative effects

3.115 These arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the draft plan have a combined effect. Key cumulative impacts of the plan are:

- Provision of at least 6,785 new dwellings to meet the borough's housing need.
- Safeguarding and intensifying employment land
- Impact on heritage assets from allocated urban sites.
- Air pollution impacts of traffic from new development in addition to the poor air quality already in the air quality management areas, which affects some urban site allocations.
- The increase in population in the borough will affect local services.

Synergistic effects

3.116 These interact to produce a total effect greater than the sum of the individual effects. Synergistic effects often happen as habitats, resources or human communities get close to capacity. Key synergistic impacts of the draft plan are:

- Several site allocations in the borough's local, district and town centres should help to encourage local businesses and community services as a greater amount of people are expected from more housing in the borough's town, district and local centres.
- The key short term, temporary (<5 years) effect of the plan is likely to be the construction of about 452 new homes per year, with higher density development, increased urbanisation and more traffic. The central and northern settlements of the borough will be particularly affected. In the medium (>5 years) and long term (>20 years), the plan is likely to lead to:
 - an increase in urbanisation, particularly in the north of the borough
 - more vibrant town, district and local centres to the north
 - increase in traffic and congestion because of the increased number of people expected over the next 15 years
 - decreased per-person in energy use, but an overall increase in energy use
 - a more planned and cohesive green infrastructure network as all new development is expected to provide this as an integral component.

Permanent effects

3.117 The draft plan is likely to have the following permanent effects,

- Protection of the borough's existing Green Belt boundaries, existing biodiversity opportunity areas and landscape setting.
- Higher density and greater development in the urban area.
- Smaller flatted development schemes being delivered.
- Urban character is likely to change, which could impact on heritage assets located in the borough's town, district and local centres.
- Lack of affordable housing due to reliance on small sites in the urban area.
- Greater green infrastructure provision as this is an integral component of future development schemes.

B4: Considering ways of mitigating adverse impacts and maximising beneficial effects.

- 3.118 As table 15 illustrates, there are a number of SA objectives that have scored either minor or significant negative effects in their appraisals. This section explains how these reported negative effects can be avoided, reduced or offset either by policy requirements or the use of other local plan policies.
- 3.119 A common issue throughout the draft policies, is the cost implication of various policies that require additional obligations in order to mitigate the negative effect. For example, draft policy SS1 ‘Responding to climate change’ requires applicants to address each of these criteria in their submission documents, including how they will minimise carbon emissions, mitigate and adapt to climate change and promote and low carbon energy schemes in their proposals.
- 3.120 The cost of implementing the mitigation could then impact on the ability to provide sufficient housing and so would have a negative effect on SA objective 1 (Housing). The Viability Assessment 2022 considers the obligations required for the draft Local Plan and states that there is broadly scope for residential development to come forward viably, meeting relevant criteria and striking an appropriate balance as required by the NPPF and PPG. This issue is highlighted through the policy appraisals at appendix 3 but is not discussed in the table below as this has been tested and discussed in the Viability Assessment 2022.
- 3.121 The table below sets out the mitigation actions for the strategic and detailed policies.

Table 17: Mitigation for Local Plan Polices.

SA Objective	Draft Policies with negative effects	Mitigation	Policies that will support mitigation
1. Housing	<p>SS1 (Responding to the climate emergency)</p> <p>SS3 (Scale and location of development)</p> <p>HOU1 (Housing Delivery)</p> <p>ECO2</p>	<p>A Climate Change and Renewables SPD will provide guidance to ensure that development responds to the climate emergency.</p> <p>Principle 2 policies- Delivering homes for our residents - all ensure that homes are</p>	<p>SS2 – Sustainable place-making states that the right mix of well-designed and adaptable homes will be assessed.</p> <p>HOU2- Optimisation This draft policy promotes high density housing, mixed se development and efficient use of land to help boost the supply of housing in the urban area.</p> <p>HOU3- Housing Mix</p>

SA Objective	Draft Policies with negative effects	Mitigation	Policies that will support mitigation
	(Strategic Employment Land)	<p>delivered for all.</p> <p>Optimising development and making effective use of land will help provide more homes in the urban area.</p> <p>There is no mitigation for not meeting housing need in full.</p>	<p>This draft policy ensures the right mix of housing is provided.</p> <p>HOU4- Affordable Housing This policy ensures that affordable housing units/financial contributions are provided.</p> <p>ECO3- Supporting our town, district and local centres. Supports housing above retail units in town and village centres.</p>
7. Employment	SS3 (Scale and location of development)	Principle 3 policies- Growing a prosperous economy - support a safeguarding policy approach to maintain and intensify the existing employment offer in the borough.	<p>SS2 – Sustainable place-making states that the council will grow a prosperous economy by providing a varied choice of business accommodation, including start-ups and small and medium enterprises (SMEs).</p> <p>Policies ECO 1, 2,3, 4 and 5 all aim to support the economy and will help mitigate the negative impacts expected from the scale and location of development policy which does not specifically allocate sites for employment use.</p>
8. Energy Use	<p>SS3 (Scale and location of development)</p> <p>HOU1 (Housing Delivery)</p>	<p>A Climate Change and Renewables SPD will help to inform developers on what design techniques they can adopt to maximise energy efficiency and integrate the use of renewable and low carbon energy.</p> <p>For major and minor development, applicants are required to submit</p>	<p>SS1- Responding to the climate emergency states that all new development must maximise energy efficiency and integrate the use of renewable and low carbon energy.</p> <p>CC1 - Energy efficiency, renewable and low carbon energy. This draft policy seeks to ensure that all new development and refurbishment is as sustainable as possible to mitigate the impact of development on the environment.</p>

SA Objective	Draft Policies with negative effects	Mitigation	Policies that will support mitigation
		<p>an Energy Statement</p> <p>Householder applications will be required to submit a Sustainable Design Checklist in line with the requirements set out in the Climate Change and Renewables SPD.</p>	
9. Natural Resources	<p>SS3 (Scale and location of development)</p> <p>HOU 1 (Housing Delivery)</p>	<p>A Climate Change and Renewables SPD will provide more information on promoting a circular economy.</p> <p>All new build development will be expected to minimise embodied carbon in line with best practice targets contained within the latest industry guidance.</p>	<p>SS1- Responding to the climate emergency. This draft policy states that new development must optimise the layout and design of buildings and landscape to reduce energy consumption, minimise waste and increase the re-use and recycling of materials.</p> <p>SS2- Sustainable place-making. All development proposals will be required to make best use of resources.</p> <p>CC2- The main purpose of this draft policy is to reduce the environmental impacts of products and services. It aims to minimise the production of waste, encourage the efficient use of minerals and reduce the use of primary resources.</p>
10. Climate Change	SS3 (Scale and location of development)	<p>A Climate Change and Renewables SPD will help to inform developers on what design techniques they can adopt to ensure that their development responds to the climate emergency.</p> <p>The highest standards of sustainable design</p>	<p>SS1- Responding to the climate emergency includes a section on mitigating and adapting to the impacts of climate change.</p> <p>SS2- Sustainable place-making. All developments must respond positively to the climate change emergency.</p> <p>CC1 - Energy efficiency, renewable and low carbon energy. This draft policy seeks</p>

SA Objective	Draft Policies with negative effects	Mitigation	Policies that will support mitigation
		<p>and construction should be applied to improve the environmental performance of new development.</p> <p>Principle 1 policies- Tackling climate change.</p> <p>Various environmental policies and infrastructure policies will also support climate change such as protecting and enhancing blue and green infrastructure, trees, biodiversity, local green space, flooding and environmental quality</p>	<p>to ensure that all new development and refurbishment is as sustainable as possible to mitigate the impact of development on the environment.</p> <p>CC2- Minimising waste and promoting a circular economy. This supports the principles of a circular economy and promotes a more effective resource use, to ensure that resources are kept in use for as long as possible and to minimise waste.</p> <p>CC3- Sustainable Design Standards. This draft policy ensures the highest level of sustainable design is applied to improve the environmental performance of new development</p> <p>CC4- Sustainable transport. This draft policy will help to ensure less reliance on the motorised vehicle, which will reduce air pollution and carbon emissions.</p>
11. Flooding	SS3 (Scale and location of development)	Existing Flooding SPD	<p>SS1 - Responding to the climate emergency. All new development must minimise vulnerability to flooding.</p> <p>SS2- Sustainable place-making. All development proposals will be required to minimise flooding</p> <p>INF1- Infrastructure delivery Facilitates infrastructure provision (such as flood defences) when needed.</p> <p>CC5- Managing Flood Risk Provides a comprehensive approach to addressing flood risk issues.</p>

SA Objective	Draft Policies with negative effects	Mitigation	Policies that will support mitigation
12. Water	SS3 (Scale and location of development)	A Climate Change and Renewables SPD will provide information and guidance on water efficiency.	<p>SS1 - Responding to the climate emergency - All development must conserve water resources.</p> <p>CC3- Sustainable Design Standards. This draft policy ensures the highest level of sustainable design is applied to improve the environmental performance of new development.</p> <p>ENV7- Environmental Quality Development should improve the environmental quality of any watercourses, groundwater and drinking water supplies, and prevent contaminated run-off.</p> <p>INF1- Infrastructure delivery Supports the delivery of water management and water utilities infrastructure to facilitate development.</p>
14. Pollution	SS3 (Scale and location of development) HOU 1 (Housing Delivery)	A Climate Change and Renewables SPD will provide information and guidance on the reduction of air pollution in new developments.	<p>SS1 - Responding to the climate emergency Development must reduce air pollution.</p> <p>SS2- Sustainable Places-making Creating spaces that are free from excessive air and noise pollution.</p> <p>CC4- Sustainable transport. This draft policy will help to ensure less reliance on the motorised vehicle, which will reduce air pollution.</p> <p>ENV7- Environmental Quality Development should minimise exposure to, and the emission of, pollutants including noise, odour and light.</p> <p>ENV8 – Air quality The design and location of new</p>

SA Objective	Draft Policies with negative effects	Mitigation	Policies that will support mitigation
			development must take account of the need to improve air quality.

Changes to draft policies as a result of the SA process.

- 3.122 The SA for the first five objectives highlighted that the housing objective (now principle 3) was scoring both unknown and negative impacts on many of the environmental SA objectives. Principle 3 ‘Delivering homes’ was revised to include reference to homes being delivered in a ‘highly sustainable way’ and hence has improved its sustainability score.
- 3.123 The SA results from the principles and strategic policies helped to bring about a number of changes to the detailed policies, which makes the plan more sustainable. CC1, CC2, CC3, CC4 and CC5 were created as the climate change strategic policy (SS1) did not clearly link to climate change detailed policies and this could impact the plan’s ability to ensure new development tackles climate change effectively.
- 3.124 Environmental policies and climate change policies were combined and were not clearly defined. New climate change and environmental policies were created to prevent confusion across these key principles. This resulted in the following new policies, CC1 (which was ENV6), CC2: Minimising waste and promoting a circular economy, CC3: Sustainable design standards, ENV2: Landscape, trees and woodlands, ENV9: Urban Design Quality and ENV11: Strategic Views. The housing technical standards policy has also lost its reference to water consumption, but this is now featured in the new climate change policy CC3.
- 3.125 This change also impacted many existing environmental detailed policies which resulted in changes to the SA appraisal results. This is most evident in the Urban Design Quality policy that loses many of its environmental SA objectives results as these go into the climate change detailed policy CC3 but gains minor positive scores for the SA objectives on economic growth and accessibility. The urban design policy will ensure that well-designed places reflect local distinctiveness, promote a strong sense of community and provide a high-quality environment for living and working.

B5: Proposing measures to monitor the significant effects of implementing the Local Plan.

- 3.126 Monitoring the success of policies will help to provide an indication of whether the significant effects predicted as part of the SA are consistent with actual effects, once the plan is being implemented. As such, monitoring will facilitate an assessment as to whether the predictions of the sustainability appraisal were accurate, whether the plan is contributing towards the achievement of the desired sustainability objectives and whether the mitigation measures are performing as well as expected.
- 3.127 This is a valuable process, as it will help in ensuring that any problems arising during implementation of the Local Plan can be identified, and future predictions made more accurately. It will also function as an important feedback mechanism to assess performance, identify unforeseen circumstances and enable adjustments and revisions to be made, if necessary.
- 3.128 National planning policy guidance states that the monitoring result should be reported in the local planning Authority's Monitoring report (AMR). The table below demonstrates which indicators will be used in the AMR to test the significant effects of implementing the plan policies.

Table 18: Indicators to test significant effects of implementing plan policies.

SA Objective	Indicator
1. Housing	<ul style="list-style-type: none"> • Number of affordable homes from new build and acquisitions. • Number of affordable homes completed. • Net additional homes delivered. • Densities of completed housing developments. • Housing completions by type and size (market and affordable) • Tenure mix of affordable housing provided (social rent, affordable rent and shared ownership) • Number of C2 residential developments with planning permission and under construction. • Number of sheltered homes delivered. • Number of Gypsy and Traveller pitches delivered.
2. Health	<ul style="list-style-type: none"> • Health dimension of the index of multiple deprivation.
3. Heritage	<ul style="list-style-type: none"> • Number of listed buildings on the Buildings at Risk Register • Number of buildings on the Heritage at Risk register • Number of agreed prioritised up-to-date Conservation Area Appraisals • Number of planning permissions granted involving significant harm to, or loss of a designated heritage asset
4. Transport	<ul style="list-style-type: none"> • Pollution levels in Air Quality Management Areas (AQMAs)

	<ul style="list-style-type: none"> • Appeals dismissed which are considered to contravene/fail to achieve pollution standards as set out in policy • Number of school travel plans submitted and applications relating to travel plans • Congestion levels (from DfT) • Length of new cycleways implemented • Length of new footways implemented • Number of train stations improved • Number of bus services improved • Projects in the infrastructure schedule delivered
5. PDL	<ul style="list-style-type: none"> • Net housing completions by land type
6. Economic Growth	<ul style="list-style-type: none"> • Total amount of additional employment floor space - by type • Total amount of employment floor space on previously developed land (including Strategic Employment Land) - by type • Amount of vacant floorspace - by type • Total amount of B1 floor space on town, district and local centres • Changes of floor space in town, district and local centres • Proportion of commercial units by class in each centre • Number of planning permissions granted for major development in town centres with only one use.
7. Employment opportunities	<ul style="list-style-type: none"> • Population economically active, including unemployed • Working age people on out of work benefits • Number of jobs
8. Energy	<ul style="list-style-type: none"> • Per capita carbon dioxide emissions (CO2) • Installed capacity of renewable energy generating development, by type.
9. Natural Resources	<ul style="list-style-type: none"> • Percentage of household waste sent for reuse, recycling and composting
10. Climate change	<ul style="list-style-type: none"> • Number of properties in Flood Zone 2 and 3
11. Flood risk	<ul style="list-style-type: none"> • Number of permissions granted contrary to advice received from the Environment Agency.
12. Water	<ul style="list-style-type: none"> • Per capita consumption of water • Percentage rivers in plan area whose biological quality is rated as "good".
13. Land	<ul style="list-style-type: none"> • Amount of contaminated land.
14. Pollution	<ul style="list-style-type: none"> • The volume of pollutants [NOx, CO2] emitted by source • Pollution levels in Air Quality Management Areas (AQMAs)
15. Landscape	<ul style="list-style-type: none"> • Percentage of development built within the urban area • Percentage of development built in the Green Belt.

16. Biodiversity	<ul style="list-style-type: none">• The efficacy of Suitable Accessible Natural Greenspace (SANGs) as set out in the Thames Basin Heaths SPA Delivery Framework• Status of Annex 1 bird species of Thames Basin Heaths SPA• Visitor survey to the Thames Basin Heaths SPA• Number, area and condition of regionally or locally designated wildlife sites• Condition of SSSIs• Condition of SNCIS• Restoration and creation of Priority Habitats
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4. Conclusion and next steps

Conclusion

- 4.1 The Council has conducted the Sustainability Appraisal in line with the SEA Regulations. The appraisal shows that the Regulation 19 Draft Local Plan policies will have a positive effect, to varying degrees, against many of the Sustainability Appraisal objectives. However, there is one significant negative impact expected for meeting the homes SA objective because the draft plan will not meet the housing need or housing mix that is needed.
- 4.2 It does however score positively in terms of protecting the existing landscape, biodiversity and land quality. It also aims to safeguard and intensify existing employment land. Furthermore, the sites allocated for mainly residential development, and 70% of the borough's housing need, are located in the urban area which are all considered sustainable and accessible. The draft Local Plan seeks to balance the social, economic and environmental expected impacts to ensure the vision for the borough can be met.

Next Steps

- 4.3 This SA report is available for comments alongside the draft Local Plan from 17 June 2022. All responses should use the [consultation response form](#).
- 4.4 Following the regulation 19 representations period, the submitted response forms will be considered, and the Local Plan finalised. An updated SA report will be published alongside the emerging Local Plan. The plan will then be submitted to an Independent Examiner who will examine it in an Examination in Public. Any modifications proposed by the Inspector will then be consulted on.
- 4.5 It is anticipated that the Local Plan will be adopted by Elmbridge Borough Council in 2023.

5. Appendices

Appendix 1: Peer review note

Report to Elmbridge Borough Council

**Sustainability appraisal of the draft Local Plan:
Review against legal requirements**

9 January 2022

Levett-Therivel sustainability consultants

Contact: Riki Therivel, tel/fax 01865 243488
riki@levett-therivel.co.uk 28A North Hinksey Lane, Oxford OX2 0LXJ

Levett-Therivel were commissioned to review the sustainability appraisal of the Elmbridge Borough Council draft Local Plan, to determine whether it complies with legal requirements and whether its findings have been fully taken into account in the decision-making process for the Local Plan.

Table 1 shows that the SA documents together – the scoping report 2020, SA report 2019 (options), SA report 2022, and SA non-technical summary – provide the information required under the Environmental Assessment of Plans and Programmes Regulations 2004. It is also clear from these documents that the SA process has informed the plan-making process, particularly in terms of identifying and documenting the impacts of different spatial alternatives and of the plan policies.

Table 1. Legal compliance of sustainability appraisal of the Elmbridge draft Local Plan

SEA requirement	Covered by the SA documents?
1. An outline of the contents and main objectives of the plan or programme, and of	Para. 1.9-1.10 & Table 2 discuss contents. Para. 3.2 shows the plan vision. Para. 3.11 shows the plan 'principles' (objectives)
its relationship with other relevant plans and programmes	Stage A1 and Appendix 1 of scoping report 2020, summarised and updated at para. 2.4-2.8 of the SA report

2. The relevant aspects of the current state of the environment/ sustainability and the likely evolution thereof without implementation of the plan or programme. aspect of the environment	The following refer to the scoping report 2020, particularly Appendix 2, and summarised in the SA report para. 2.9-2.26
(a) biodiversity	Biodiversity, flora and fauna
(b) population	Health and wellbeing
(c) human health	Health and wellbeing
(d) fauna	See biodiversity
(e) flora	See biodiversity
(f) soil	Natural resources
(g) water	Natural resources
(h) air	Air, light and noise quality
(i) climatic factors	Climate change
(j) material assets	Access and equality, Natural resources
(k) cultural heritage	Cultural heritage and the historic environment
(l) landscape	Landscape
likely evolution without plan?	SA report para. 2.9-2.26
3. The environmental/ sustainability characteristics of areas likely to be significantly affected.	Scoping report Stage A3
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Para. 2.14-2.26 of SA report
5. The environmental protection objectives, established at international, Community or Member State level...	Appendix 1 of the scoping report 2020; SA framework at Figure 2 of SA report
6. The likely significant effects on the environment..., on issues such as—	SA framework objective...
(a) biodiversity	16
(b) population	6
(c) human health	2
(d) fauna	16
(e) flora	16
(f) soil	5, 10, 13
(g) water	11, 12
(h) air	14
(i) climatic factors	8, 10
(j) material assets	1, 4, 5, 9
(k) cultural heritage etc	3, 4
(l) landscape	15
	Plan objectives/principles assessed at para. 3.4-3.16

	<p>and Appendix 2.</p> <p>Plan options/alternatives/sites assessed at para. 3.17-3.82, with additional information in the SA scoping report 2016, Alternative Development Options paper 2016, SA report 2019, Land Availability Assessments 2018 and 2021, Green Belt Boundary Review etc.</p> <p>Plan policies assessed at para. 3.83-3.95 and Appendix 3, with additional information in the Land Availability Assessment 2021</p>
<p>These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects</p>	<p>Overall/cumulative impacts of the plan are at para. 3.97-3.106 and 3.108</p> <p>Secondary/indirect impacts of the plan are at para. 3.108</p> <p>Synergistic impacts of the plan are at para. 3.110.</p> <p>Short-term/temporary and long-term impacts of the plan are at para 3.110</p> <p>Permanent impacts of the plan are at para. 3.111</p>
<p>7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>	<p>Table 17 lists plan policies that act as mitigation for the negative impacts of other plan policies. Para. 3.116-3.119 document changes to the plan policies (mitigation measures) made as a result of the SA process.</p>
<p>8. An outline of the reasons for selecting the alternatives dealt with...</p>	<p>Para. 3.17-3.69 provide a detailed explanation of the alternatives considered, and the problems/issues related to each alternative. The SA concludes that Alternative 4A is the preferred alternative.</p>
<p>...and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<p>Para. 1.5-1.8 explain how the assessment was undertaken, including difficulties caused by changing national policy and guidance.</p>
<p>9. A description of the measures envisaged concerning monitoring...</p>	<p>Para. 3.112-3.115 discuss this, and Table 18 provides a list of proposed monitoring indicators.</p>
<p>10. A non-technical summary of the information provided under paragraphs 1 to 9.</p>	<p>A separate report provides a non-technical summary of the information provided in the SA report.</p>

Appendix 2: SA for draft Local Plan principles

Detailed SA for the principles.

Principle 1: Tackling Climate Change

To adapt to, and mitigate, the effects of climate change; to reduce carbon dioxide emissions, minimise energy use; improve air quality and protect and enhance our natural environment.

To improve the borough's resilience to climate change.

SA Objective 1 (housing), SA Objective 4 (accessibility), SA Objective 3 (heritage) and SA Objective 7 (economic growth) have been scoped out because they score neither positively nor negatively for these SA objectives. It is not focused on boosting housing supply, economic growth or enhancing heritage assets. It is focussed on tackling climate change and therefore impacts are expected across the environmental SA objectives.

SA Objective	Score	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	The principle would have a positive impact on people's health as tackling climate change, particularly improving air quality will help create healthier living, work and leisure space. Therefore, the objective would have a minor positive impact on this SA objective
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	Reducing carbon dioxide emissions and minimising energy use will help to move to a low carbon economy and therefore scores a minor positive result for this SA objective.
9. To use natural resources prudently	+	Although this principle does not explicitly mention the use of natural resources, it will contribute to the protection and enhancement of the natural environment and therefore scores a minor positive impact.
10. To adapt to the changing climate.	++	This is the main aim of this principle and has a major positive impact.
11. To reduce flood risk.	+	Although the objective does not include reference to reducing flood risk, it does include adapting and mitigating the effects of climate change, which does result in a minor positive effect.
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	+	This principle will contribute to the protection and enhancement of the natural environment and therefore scores a minor positive impact.

SA Objective	Score	Commentary
13. To reduce land contamination and safeguard soil quality and quantity.	+	This principle will contribute to the protection and enhancement of the natural environment and therefore scores a minor positive impact.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	This principle aims to improve air quality and therefore scores a minor positive impact.
15. To protect and enhance landscape character.	+	This principle will contribute to the protection and enhancement of the natural environment which includes landscape character and therefore scores a minor positive impact.
16. To conserve and enhance biodiversity.	+	Adapting to climate change will help to conserve and enhance biodiversity and therefore scores a major positive result.

Principle 2: Protecting and enhancing the quality of the environment

Promoting cleaner and greener living, in order to conserve and enhance biodiversity, whilst creating a sustainable environment to live, work and spend our leisure time.

Ensuring strong protection of the Green Belt from inappropriate development and protecting and enhancing green and blue spaces to improve biodiversity, connectivity and access.

Preserving and enhancing our recognised heritage assets. Ensuring they continue to be conserved in a manner appropriate to their significance.

SA Objective 1 (housing) has been scoped out because it scores neither positively nor negatively on this SA objective. It is not focused on boosting housing supply. It does not score a negative impact because it promotes cleaner and greener living which will create a sustainable environment and not necessarily prevent housing from being delivered.

SA Objective	Score	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	++	The principle would have a major positive impact on people's health as the promotion of cleaner /greener living will help create healthier living, work and leisure space. Protecting and enhancing green and blue spaces and improving connectivity and access is important for people's physical and mental well-being. Historic places and heritage assets can have a wide range of beneficial impacts on the physical, mental and social wellbeing of individuals and communities. Therefore, the principle would have a minor positive impact on this SA objective
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	++	This principle will conserve and enhance archaeological, historic and cultural assets and their settings.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	++	Improving access and connectivity would reduce the need to travel and encourage more sustainable methods and therefore scores a major positive impact.

SA Objective	Score	Commentary
6. To support economic growth, which is inclusive, innovative and sustainable.	+	The principle states that the promotion of cleaner greener living will promote sustainable places to work and therefore scores a minor positive.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	Although this principle does not explicitly refer to this, promoting greener living would involve moving to a low carbon economy and protecting and enhancing green and blue spaces to improve biodiversity will help to adapt to climate change and in turn reduce greenhouse gases and therefore scores a minor positive result.
9. To use natural resources prudently	+	The prudent use of natural resources will contribute to the promotion of greener and cleaner living and therefore scores a minor positive impact.
10. To adapt to the changing climate.	++	Protecting and enhancing green and blue spaces and promoting cleaner and greener living, to conserve and enhance biodiversity will help to respond and adapt to climate change. It therefore has a major positive impact.
11. To reduce flood risk.	+	Although the principle does not include reference to reducing flood risk, it does include adapting and mitigating the effects of climate change, which does result in a minor positive effect.
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	+	This principle aims to help to improve biodiversity, use natural resources prudently and minimise pollution and hence scores a minor positive impact.
13. To reduce land contamination and safeguard soil quality and quantity.	+	This principle will contribute to the protection and enhancement of the natural environment and therefore scores a minor positive impact.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	This principle will help to protect the natural environment, improve biodiversity and mitigate climate change and therefore scores a minor positive impact.
15. To protect and enhance landscape character.	++	This principle will protect the Green Belt, green and blue spaces. Promoting greener and cleaner living and enhancing biodiversity will help protect and enhance the landscape character. It therefore scores a major positive result.

SA Objective	Score	Commentary
16. To conserve and enhance biodiversity.	++	Promoting cleaner and greener living and adapting to climate change will help to conserve and enhance biodiversity and therefore scores a major positive result.

Principle 3: Delivering homes

Improving housing choice and delivering well-designed high-quality homes that we need in a highly sustainable way.

Creating strong and thriving communities.

SA Objectives 3, 4, 6, 9, 11,12, 13, 14, 15 and 16 were scoped out as they score neither positively or negatively.

SA Objective	Score	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	++	Improving housing choice will allow people to assess homes suitable for their needs and therefore it scores a major positive result.
2. To facilitate the improved health and wellbeing of the whole population.	++	The provision of high quality, sustainable homes will have a major positive impact on people's health and well-being.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	Delivering excellently designed high quality homes in a highly sustainable way, will help to reduce greenhouse gas emissions and therefore scores a minor positive result.
10. To adapt to the changing climate.	+	Delivering excellently designed high quality homes in a highly sustainable way will help to adapt to climate change. It therefore scores a minor positive impact.

Principle 4: Growing a prosperous economy

Providing the environment and opportunities to foster a prosperous economy with modern, flexible and well-connected workspaces where industries and businesses can thrive.

Supporting our town, district and local centres and managing their transition into distinctive places of socialisation, community support, events and culture which are less dependent on a retail offer.

SA Objectives 1, 9, 11,12, 13, 15 and 16 were scoped out as they score neither positively nor negatively.

SA Objective	Score	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	Providing a diverse range of uses in the town and village centres would facilitate the improved health and well-being of the population as people would have greater access to services.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	+	Providing cultural events would help to enhance the borough's cultural and historic assets and thus scores a minor positive impact.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	Providing flexible and accessible workspaces would reduce the need to travel and / or improve accessibility to workspaces. This principle would also help to reduce the need to travel as town and village centre would have a range of different uses that people could access easily. This would have a minor positive impact on the SA objective.
6. To support economic growth which is inclusive, innovative and sustainable.	+	Providing greater uses in the borough's town and village centre would help to support economic growth that is inclusive, innovative and sustainable.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	Reducing the need to travel for a range of venues, events and uses would help to reduce greenhouse gas emissions. It also promotes flexible and well-connected workspaces and therefore scores a minor positive impact.
10. To adapt to the changing climate.	+	Reducing the need to travel for a range of venues, events and uses would help to adapt to the changing climate. It therefore scores a minor positive impact.
14. To ensure air quality continues to improve and noise and light pollution are	+	Providing a range of uses in the town and village centres would reduce commuting and therefore help improve air quality. Noise and light pollution

SA Objective	Score	Commentary
reduced.		could also be taken away from other areas if focussed in the borough's town and village centres. This principle therefore scores a minor positive impact.

Principle 5: Providing infrastructure and connectivity

Reducing reliance on the car, reducing issues of air quality and congestion and supporting modal shift in the way people live and access local services, workspaces and facilities.

Coordinating the delivery of the right infrastructure in the right place and at the right time for the benefit of residents, businesses, visitors and biodiversity and the natural environment.

SA Objectives 3, 9 and 15 were scoped out as they score neither positively or negatively as the principle does not focus on heritage assets, natural resources or landscape character.

SA Objective	Score	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	This principle has a minor positive impact because it aims to provide the infrastructure required to allow growth to happen.
2. To facilitate the improved health and wellbeing of the whole population.	++	This will deliver the right infrastructure in the right place will help communities health and well-being. It will also reduce reliance on the car helping reduce asthma and encourage exercise using sustainable methods of transport. It therefore scores a major positive impact.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	++	Ensuring the delivery of the right infrastructure in the right place and at the right, will help to reduce the need to travel and improve accessibility to services. Reducing reliance on the car, reducing congestion and supporting a model shift in how people access services will have a major positive impact.
6. To support economic growth which is inclusive, innovative and sustainable.	+	Ensuring the delivery of the right infrastructure in the right place at the right time will help economic growth and so scores a minor positive impact.

SA Objective	Score	Commentary
8. To reduce greenhouse gas emissions and move to a low carbon economy.	++	The principle will reduce emissions and therefore scores a minor positive impact.
10.To adapt to the changing climate.	+	This principle stated that the right infrastructure will be provided at the right time to benefit the environment. Reducing congestion and air pollution will have the borough adapt to climate change and hence scores a minor positive impact.
11.To reduce flood risk.	+	This principle stated that the right infrastructure will be provided at the right time to benefit the environment and hence scores a minor positive impact.
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	+	This principle stated that the right infrastructure will be provided at the right time to benefit the environment and hence scores a minor positive impact.
13. To reduce land contamination and safeguard soil quality and quantity.	+	This principle will contribute to the protection and enhancement of the natural environment by reducing reliance on the car and therefore scores a minor positive impact.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	++	This principle will help to reduce air pollution and therefore scores a major positive impact
16. To conserve and enhance biodiversity.	+	The principle states that the right infrastructure will be provided at the right time to benefit biodiversity and the natural environment and hence scores a minor positive impact.

Appendix 3: SA for draft Local Plan policies (Strategic and Detailed)

Sustainability Appraisal of Draft Local Plan Policies

Spatial Strategy Policies

SS1 - Responding to the climate emergency

All development must respond to the climate emergency by:

1. Minimising carbon emissions:

a) Directing development towards locations that minimise the need to travel and maximise the ability to make trips by sustainable modes of transport including cycling, walking and public transport.

b) Delivering an efficient use of land especially on the most accessible sites.

c) Providing more walkable and cyclable neighbourhoods that reduce demand for the use of private vehicles.

d) Optimising the layout and design of buildings and landscape to reduce energy consumption, minimise waste and increase the re-use and recycling of materials.

e) Maximising energy efficiency and integrating the use of renewable and low carbon energy.

f) Avoiding demolition by repurposing existing structures.

g) Promoting the retrofitting of existing buildings, including incorporating measures to reduce energy consumption.

2. Mitigating and adapting to the impacts of climate change:

a) Conserving water resources and minimising vulnerability to flooding.

b) Providing shade and green and blue infrastructure to reduce overheating of urban areas during warmer summers.

c) Increasing the extent, connectivity and diversity of wildlife habitats to enable animals and plants to adjust.

d) Reducing air pollution so as to minimise the potential for higher temperatures to worsen air quality.

3. Promoting renewable and low carbon energy schemes:

a) Identifying and supporting opportunities for the delivery of renewable and low carbon energy schemes.

b) Ensuring the provision of renewable and low carbon energy generation infrastructure is located and designed to minimise potential adverse effects, with particular regard to protecting the natural, historic and built environment.

Reasoning for preferred draft policy (DP)
National policy states that plans should take a proactive approach to mitigating and adapting to climate change. It is also a key priority for the council to tackle climate change and forms a key principle to achieve the vision. The policy will help to provide the link to more detailed climate change detailed policies and a future Climate Change and Renewables SPD.
Alternative Assessed
Alternative 1 (A1): It was considered important to test a policy with explicit targets rather than relying on promotion and encouragement. This could include for example, on-site carbon reductions targets, percentage improvements going further than building regulations and fabric efficiency targets. Additionally, the alternative would aim to ensure developers report and monitor the results of the adaption and mitigation schemes for a set period of time so that there is still responsibility to ensure new development is responding to climate change not just in the short term.
Consultation comments
The need to respond to the climate change agenda and reduce the borough's carbon footprint was a common response from the public and key stakeholders in all 3 regulation 18 consultations. Addressing climate change was repeatedly commented on in statutory representations and at the community workshops during the vision consultation.
Mitigation measures
There are no negative impacts expected to warrant mitigation. Developers will need explain what they will do to respond to the climate emergency in their planning application submissions. The Renewable SPD will also help to inform developers on what design techniques they can adopt to ensure that their development responds to the climate emergency.
Scoped out SA Objectives
Neutral impacts are expected for SA objective 13 (land contamination) and SA objective 15 (landscape character).

SA Objective	DP	A1	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	--	A neutral impact on the provision of housing is expected as the viability assessment 2022 suggests that residential development can come forward viably. Climate change mitigation will not prevent this. The alternative would expect developers to go further than building regulation targets and meet higher targets on energy efficiency and fabric efficiency. This would

SA Objective	DP	A1	Commentary
			have a cost implication which could impact significantly on home building.
2. To facilitate the improved health and wellbeing of the whole population.	+	++	<p>This draft policy will have a positive impact on the health and well-being of the population as its aims to include more sustainable methods of transport such as walking and cycling which will have positive impacts of people's health. Reducing air pollution will also help to reduce respiratory health problems. In the long term, this should get significantly more positive as schemes progress and pollution reduces.</p> <p>Including targets for reducing carbon and monitoring impacts significantly improves the likelihood of delivery and this would have a significant impact on people's health and well-being.</p>
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	+	++	<p>Responding to the climate emergency includes the promotion of retro fitting of existing buildings including the re-use of historic buildings which would reduce energy consumption and resources. The draft policy also states that it will ensure that the provision of renewable and low carbon generation infrastructure is located and designed to minimise potential adverse effects protecting the historic environment. This positive impact is achievable in the short, medium and long term.</p> <p>As the alternative ensures that this is monitored and therefore scores a significant positive. However, viability could affect the success of this option.</p>
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	++	<p>Directing development towards locations that minimise the need to travel and maximise the ability to make trips by sustainable modes of transport including cycling, walking and public transport will minimise carbon emissions. This will improve accessibility to all services and facilities. As a result, the draft policy could achieve significant positive impacts as development schemes are built and sustainable modes of transport are provided for communities in the medium and long term.</p> <p>The use of targets for the alternative policy results in an expected significant positive impact across the duration of the plan.</p>
5. To make the best use of previously developed land and existing buildings.	+	++	<p>The draft policy states that it seeks to deliver an efficient use of land and to promote the retrofitting of existing buildings. This will have a positive impact that can be consistently achieved from the short term until the long-term lifetime of the plan.</p> <p>The alternative would be more explicit in that it would prioritise the re-use and retrofitting of existing building</p>

SA Objective	DP	A1	Commentary
			before considering the design of new buildings, so scores a significant positive.
6. To support economic growth which is inclusive, innovative and sustainable.	+	++	<p>This draft policy encourages innovative technologies and low carbon development schemes. This may result in a more innovative and sustainable local economy. Economic development that harnesses low carbon technology can also attract additional businesses and enterprises to the borough.</p> <p>The alternative includes targets and monitoring of schemes and therefore scores a significant positive result.</p>
7. To provide for employment opportunities to meet the needs of the local economy.	+	+	Identifying and supporting opportunities for the delivery of renewable and low carbon energy schemes may provide new employment opportunities to meet the needs of the local economy. This is similar for both options, although the alternative has a greater chance in delivering the schemes.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	++	Central to this draft policy's aim is to minimise carbon emissions and the draft policy provides seven criteria to do that. This will have positive impacts across the duration of the plan. As the alternative would provide the targets to do so, it scores the significant positive impact.
9. To use natural resources prudently	+	++	<p>This draft policy seeks to optimise the layout and design of buildings and landscape to reduce energy consumption, minimise waste and increase the re-use and recycling of materials. This will have immediate positive impacts that will become significant once implemented and delivered.</p> <p>The alternative expects targets to be met and impacts to be monitored over a set period of time which results in a significant positive impact.</p>
10. To adapt to the changing climate.	+	++	This is the main aim of this strategic policy and should start to see significant positive impacts in the medium to long term for alternative 1. Alternative 2 has significant positive impacts immediately because it guarantees adaption and mitigation at the start of the plan period.
11. To reduce flood risk.	+	+	Both the draft policy and alternative 1 state that new development must conserve water resources and minimise vulnerability to flooding. Developers need to explain how this can be achieved and this could be achievable in the short, medium and long term for both.

SA Objective	DP	A1	Commentary
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	+	++	The draft policy will mitigate and adapt to the impacts of climate change by conserving water resources. It intends to help improve biodiversity, use natural resources prudently and minimise pollution all of which will help improve water quality. This holistic approach does result in a minor positive score for this SA objective. The reason it cannot score a significant positive is due to the fact that growth will require a larger water supply and there is no target for water use included in the policy. Alternative 2 includes greater detail and the minimum water efficiency standard per person and hence has a significant positive impact.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	+	Both aim to reduce carbon emissions by minimising the need to travel by private motorised vehicles and maximising more sustainable modes of transport. They also state that the council will seek to reduce air pollution and so will see minor positive impacts in the short term. As more accessible development schemes are built and with greater access to electric vehicles, air quality should significantly improve in the medium and long term.
16. To conserve and enhance biodiversity.	+	+	Both will increase the extent, connectivity and diversity of wildlife habitats to enable animals and plants to adjust. This will have a positive impact throughout the lifetime of the plan.

Overall conclusion

The draft policy would have positive impacts on all the environmental and economic SA objectives. Central to this aim is to minimise carbon emissions and the policy provides seven criteria to do that. This will have significant positive impacts in the medium- and long-term duration of the plan for a further five environmental SA objectives (transport, natural resources, climate change and air quality/ pollution) and one social SA objective, to facilitate the improved health and well-being of the whole population. There are no significant negative effects that would require the draft policy to be reconsidered.

Alternative 2 scores significant positive impacts across many of the environmental SA objectives, but does score a significant negative impact on SA objective 1: Homes. This is due to the costs of meeting targets and monitoring to ensure climate change adaption and mitigation is delivered.

SS2 - Sustainable place-making

1. The council will apply the presumption in favour of sustainable development, balancing the economic, social and environmental objectives.

2. All development proposals will be assessed taking into account the following criteria:

(a) Protecting and enhancing our natural, historic and built environment by:

i) Responding positively to the climate emergency, by mitigating and adapting and requiring the best use of resources and assets and minimise flood risk.

ii) Conserving and enhancing biodiversity

iii) Enhancing the character and qualities of places and contribute positively to local distinctiveness, identity and history.

iv) Creating attractive, safe and inviting environments and public spaces that encourage healthy lifestyles and that are free from unacceptable air and noise pollution.

v) Protecting the Green Belt as defined on the Policies Map from inappropriate development in accordance with national planning policy and the policies set out in the Plan.

(b) Delivering homes for all by:

i) Delivering the right mix of well-designed and adaptable homes, including affordable and smaller housing to meet local housing needs.

ii) Incorporating a range of amenities and facilities to meet local needs.

(c) Growing a prosperous economy by:

i) Providing a varied choice of business accommodation, including for start-ups and Small and Medium Enterprises (SMEs).

ii) Delivering vibrant and adaptable town, district and local centres to support the evolving needs of residents, businesses and visitors.

(d) Providing infrastructure and connectivity by:

i) Providing integrated and improved access to high quality green and blue infrastructure for the wellbeing of residents and visitors as well as contributing to a variety of important environmental functions and attracting inward investment.

ii) Making it easy and attractive to walk, cycle and use public transport.

iii) Offering excellent connections through sustainable transport links to reduce reliance on private motor vehicles.

iv) Providing excellent integrated digital connectivity.

Reasoning for Preferred draft policy (DP)
This policy will ensure that all planning decisions will have regard to the overall aims of the Plan and contribute to achieving the vision for Elmbridge 2037 as well as creating greater synergy with national planning policy and the national design guidance.
Alternatives Assessed
A1: Include a policy encouraging strong local distinctiveness and require developments to have regard to the local character and context. Consider the relationship between buildings, spaces and landscape as well as detailed design and materials. Refer to specific density figures like that in the existing Core Strategy A2: Do not include a policy on place shaping. Have a more flexible approach to the design of the built environment and surrounds. Rely solely on the NPPF and the national design guide.
Consultation comments
Comments in response to all 3 regulation 18 consultations highlighted the importance of protecting, enhancing and maintaining the borough's attractiveness and distinctive identity. It was mentioned that placemaking should be applied at the planning application stage.
Mitigation measures
There are no negative impacts expected that warrant mitigation. A Local Design Code will assist developers in adopting certain approaches to ensure sustainable place-making is central to their development proposals.
Scoped out SA Objectives
Neutral impacts are expected for SA objective 12 (water) and SA objective 13 (land contamination).

SA Objective	DP	A1	A2	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	-	0	<p>The draft policy would have a positive impact as it states that it will deliver the right mix of well-designed and adaptable homes including affordable and smaller housing to meet local housing needs.</p> <p>Alternative 1 could impact on the provision of housing if the need for retaining character prevents more innovative design solutions that could help provide much needed housing. This may become a significant negative impact as urban land supply gets more limited.</p> <p>Alternative 2 does not include the local authority's vision and objectives and so has no effect on the achievement of this SA objective.</p>

SA Objective	DP	A1	A2	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	-	0	<p>The draft policy balances the need to provide sufficient housing, and a sustainable environment that will help improve people's quality of life. As this is a balance between the built and natural environment this scores a minor positive result across the lifetime of the plan.</p> <p>Alternative 1 could impact negatively on people's health and wellbeing if the focus on character and local distinctiveness prevents the development of well-designed spaces and sufficient housing to meet needs.</p> <p>Although national policy does include support for the creation of well-designed sustainable places, it requires local authorities to create a clear design vision for their area. Therefore, the impacts of alternative 2 are expected to be neutral.</p>
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	+	++	0	<p>The draft policy balances the historic, natural and built environment so has a minor positive impact.</p> <p>Alternative 1 would focus on maintaining the borough's existing character and this would have a significant positive impact on heritage assets and their setting.</p> <p>Alternative 2 does not include the local requirement and therefore has a neutral affect.</p>
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	0	+	<p>The draft policy does include reference to connectivity and reinforces the need to provide integrated and improved access to high quality green and blue infrastructure.</p> <p>Alternative 1 is focused on character of the area and does not include access to all services and facilities.</p> <p>Alternative 2 does include reference to accessibility in place making which would result in minor positive effects.</p>
5. To make the best use of previously developed land and existing buildings.	+	-	+	<p>Alternative 1 may have a minor negative impact due to emphasis on the existing character which tends to be low density. If development continues to be delivered at a lower density, this situation could have significant negative impacts on this SA objective in the long term.</p> <p>The draft policy and alternative 2 try to balance this and hence both score a minor positive result.</p>

SA Objective	DP	A1	A2	Commentary
6. To support economic growth which is inclusive, innovative and sustainable.	+	0	0	<p>The draft policy provides a section on growing a prosperous economy and therefore has a minor positive impact.</p> <p>Alternatives 1 and 2 do not include reference to economic growth and therefore score neutral results.</p>
7. To provide for employment opportunities to meet the needs of the local economy.	+	0	0	<p>The draft policy provides a section on growing a prosperous economy and therefore has a minor positive impact.</p> <p>Alternatives 1 and 2 do not include reference to employment and therefore score neutral results.</p>
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	0	0	<p>The draft policy scores a minor positive effect as the policy is concerned with the protection and enhancement of the local natural, historic and built environment and aims to respond positively to the climate emergency.</p> <p>Alternatives 1 and 2 do not include this specifically and therefore score neutral results.</p>
9. To use natural resources prudently	+	0	0	<p>The draft policy states that it will require the best use of resources and assets and therefore scores a minor positive result throughout the lifetime of the plan.</p> <p>Alternatives 1 and 2 have neutral scores as this SA objective is not explicitly covered in these options.</p>
10. To adapt to the changing climate.	+	0	0	<p>The draft policy includes responding positively to the climate emergency and scores a minor positive result because it also balances providing homes for all, growing a prosperous economy and providing infrastructure and connectivity.</p> <p>Alternatives 1 and 2 score neutral results.</p>
11. To reduce flood risk.	+	0	0	<p>The draft policy includes minimising flood risk and scores a minor positive result.</p> <p>Alternatives 1 and 2 score neutral results.</p>
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	0	0	<p>Alternatives 1 and 2 do not provide the detail to influence the achievement of the SA objective. However, the draft policy does include the creation of places that are free from excessive air pollution and sustainable transport links to reduce reliance on private motor vehicles. This is likely to improve in the long term as technology and sustainable transport methods improve.</p>

SA Objective	DP	A1	A2	Commentary
15. To protect and enhance landscape character.	+	+	0	As alternative 1 is concerned with local distinctiveness and the retention of character, the existing landscape character would be maintained. Therefore, this option scores a minor positive result. The draft policy aims to enhance the character and qualities of places and contribute positively to local distinctiveness, identify and history. Therefore, this policy also would have a minor positive impact on this SA objective. Alternative 2 is not locally specific so scores a neutral result.
16. To conserve and enhance biodiversity.	+	0	0	Both alternatives do not focus of the conservation and enhancement of biodiversity and so has no effect on the SA objective. The draft policy does however balance protecting and enhancing the natural, historic and built environment and so has a minor positive effect on this SA objective.

Overall Conclusion

Alternative 1 was rejected as this would be too detailed and would be better suited to the Local Design Code. Prescribed policies on local distinctiveness and densities can also restrict the efficient use of land. Alternative 2 was rejected as this approach would limit the extent to which development takes account of the local context and the vision and principles important to Elmbridge.

The preferred draft policy will ensure that all planning decisions will have regard to the overall aims of the Plan and contribute to achieving the vision for Elmbridge 2037 as well as creating greater synergy with national planning policy and the national design guidance.

SS3 - Scale and location of good growth

1. The Plan will make provision for the delivery of the following development between 2021 and 2037:

- a) At least 6,785 net additional homes, with at least 30% to be affordable,
- b) Provision for Gypsy, Roma, and Traveller pitches.
- c) Retail, leisure, community and other town and village centre uses to support the evolving needs of residents, workers and visitors.
- d) A range of business and employment floorspace including modern, flexible and well-connected workspaces to increase employment opportunities for residents.
- e) Infrastructure to support housing and other development.

2. A 'brownfield first' approach will be taken, using opportunities to develop previously developed land within the urban area of the borough as they offer the most sustainable locations.

3. Development opportunities will be encouraged within the urban areas which accord with other policies in the Plan and meet the following strategic aims:

- a) Enhancing the vitality and viability of town and district centres.
- b) Repurposing/redevelopment/diversification of specific sites now vacant in employment use.
- c) Repurposing/redevelopment of previously developed sites into mixed uses.
- d) Optimisation of development within the urban area to increase the efficient use of land. All new residential development adjacent to town, district and local centres and train stations, should be predominately one- and two- bedroom homes. An exception will be made for proposals for one for one replacement of an existing home.

4. Development will be delivered across the borough in the following broad locations:

Settlement total	No. of units*	% of
Claygate	320	4.7
Cobham & Oxshott, Stoke D'Abernon and Downside	870	12.8
East & West Molesey	730	10.7
Esher	1215	17.9

Hersham	560	8.3
Long Ditton, Thames Ditton, Hinchley Wood & Weston Green	635	9.3
Walton-on-Thames	1255	18.5
Weybridge	1200	17.7
Total	6785	100

* rounded to the nearest 5. Includes permissions, units under construction, and Land Availability Assessment (LAA)sites. Not including non-implementation discount rates or windfalls

5. The council will support the delivery of development that makes an important contribution to the borough at the following locations and as identified on the Policies Map:

- a) Brooklands College for higher education, further education and vocational training and up/skilling
- b) Lower Green for community regeneration
- c) Whiteley Village for specialist care facilities

6. Comprehensive development that achieves a co-ordinated approach with adjoining sites will be encouraged, especially when it may result in additional benefits such as, for example, improved access arrangements, greater efficient use of land, increased provision of affordable housing, integration of green and blue infrastructure and biodiversity links through the development site.

Reasoning for preferred draft policy
This draft policy provides the opportunity to meet the borough's development needs with an urban only approach.
Alternatives Assessed
<p>The strategic options (2016) and options (2019) regulation 18 consultations considered all reasonable alternatives for the scale and location of development in detail. These are discussed in full in the main SA report. As these are no longer considered reasonable, they are not presented again here.</p> <p>Since then three more options were assessed in 2021 and later updated in 2022 following changes to the LHN and LAA. They include the draft policy detailed above and the following two alternatives:</p> <p>A1 (Option 5a): A draft policy that provides the opportunity to meet the borough's development needs with a brownfield first approach and minor changes to the green belt boundary.</p> <p>A2 (Option 6): A draft policy that seeks to intensify development around town and village centres and train stations.</p>
Relevant Consultation comments
Revising the Green Belt boundary was not supported by the community in all 3 regulation 18 consultations. However, respondents did feel that affordable housing and a mix of housing types were important.
Mitigation measures
<p>Nearly all the environmental SA objectives have negative scores as further development and growth will inevitably impact on the environment. However, there are opportunities to mitigate the effects and provide the balance in terms of responding to the climate change emergency, protecting the natural environment and delivering sustainable place-making. Although the historic environment could also be significantly affected by further development in the urban area, this can be enhanced with good design principles and the Local Design Code will help to achieve this. Currently the score is unknown because the individual site designs are not available at this stage.</p> <p>Where the SA objective scores a significant or minor negative result, a brief account of the mitigation is provided in the commentary where relevant.</p>

SA Objective	DP	A1	A2	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	--	-	-	<p>The draft policy will not significantly boost the supply of housing as it will meet 70% the housing need. Using only sites in the urban area due to the borough's constraints the draft policy will not provide homes that are a suitable size and type to meet identified needs. The lack of larger sites does result in less opportunities to provide affordable homes, smaller family homes, specialist housing, custom builds and Traveller pitches. Therefore, as this policy will not meet housing need or provide the mix required a significant negative impact is expected.</p> <p>Alternative 1 includes Green Belt sites which are larger in size and would allow greater affordable</p>

SA Objective	DP	A1	A2	Commentary
				<p>housing provision, specialist housing, custom build and Traveller pitches which will enable people to live in a home suitable to their needs which they can afford. However, it does not meet the LHN.</p> <p>Alternative 2 would not meet the housing need in full but does intensify land in the urban area. Providing a mix of housing types will be difficult to achieve on such small sites. Therefore, a minor negative impact is expected across the duration of the plan.</p>
2. To facilitate the improved health and wellbeing of the whole population.	+	+	+	<p>The draft policy and both alternatives include the same urban sites, which means all allow access to existing health provisions such as dentists, GPs and health clinics. Being located in the urban area means people can access these more easily and potentially with less reliance on the car. Additionally, all have the same access to urban green spaces and leisure facilities which encourage healthy lifestyles. As all new development proposals must be designed with green and/or blue infrastructure, all options result in greater access to nature which brings health and wellbeing benefits. All score minor positive impacts across the duration of the plan for all.</p> <p>Alternative 1 also focuses development in the urban area with only 12 allocated Green Belt sites closest to existing settlements. It nearly meets the borough's housing needs and allows a mix of types which would improve people's health and well-being. As it does not meet housing needs in full, it scores a minor positive impact.</p>
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	?	?	?	<p>Both the draft policy and the alternatives contain the same sites in the urban area and some of these are located within the historic environment. Future development could have a negative impact but could enhance the historic environment. This would be largely dependent upon the proposed design which is unknown at this stage.</p> <p>Alternative 2 would intensify some of the urban sites in the borough's town and village centres, which are often located in or close to conservation areas and so could have a minor negative impact on the heritage assets but as the design of development is unknown the result is unknown at this stage.</p> <p>Alternative 1 includes 12 Green Belt sites and there are 2 sites that are located within or close to heritage assets. However, the same applies as future development could enhance the historic environment. Therefore, all score unknown results.</p>

SA Objective	DP	A1	A2	Commentary
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	+	++	Focusing development in the urban area will help to reduce the need to travel and will improve accessibility to all services and facilities. Changes to the Green Belt boundary will include extensions to the built-up areas and so this will ensure development is accessible. As a result, it is expected that the draft policy and alternative 1 would have a minor positive impact on this SA objective. Significant positive impacts are expected for alternative 2 as development will be intensified in the most sustainable urban areas, which would reduce occupants need to travel, encourage sustainable transport options and improve accessibility to key services and facilities.
5. To make the best use of previously developed land and existing buildings.	+	+	++	<p>The draft policy is for an urban only approach using opportunities to develop previously developed land and land within the urban area. This scores a minor positive effect across the short and medium duration of the plan. This is likely to change as urban /previously developed land runs out and hence the use of greenfield development in the long term may have minor negative effects on this SA objective for all options.</p> <p>Alternative 1 also scores a minor positive impact in the short term as it prioritises land in the urban area first. It does include 4 Green Belt sites that are 100% greenfield which score significant negative results individually. Therefore, alternative 1 would have a minor negative result in the medium to long term when the Green Belt sites are needed.</p> <p>Alternative 2 ensures that development is making the best use of land as it intensifies the urban area which results in a significant positive impact throughout the duration of the plan.</p>
6. To support economic growth which is inclusive, innovative and sustainable.	?	?	?	<p>The policy states that provision will be made for range of business and employment floorspace including modern, flexible and well-connected workspaces to increase employment opportunities for residents. They will all encourage mixed use development and could indeed facilitate flexible working practices. Therefore, all aim to support economic growth, which is inclusive, innovative and sustainable. However, all three have limited land availability which could impact on deliverability.</p> <p>The allocated urban sites that are featured in the draft policy and alternatives do include extensions to 3 existing employment sites but there are also many sites that represent a partial or full loss to many local business uses such as offices and retail. There is only 1 additional site that is being allocated in Green Belt for an extension to an existing employment use.</p>

SA Objective	DP	A1	A2	Commentary
				<p>Therefore, none of the options are considered to result in significant economic growth in terms of land and premises.</p> <p>Because premises, land, infrastructure and services will be limited for all options, it will be difficult to provide for new and emerging sectors. Additionally, the evidence suggests that there is uncertainty in the market particularly following the pandemic and the continued change in consumers shopping habits etc. Not only this but permitted development rights and changing work patterns are also impacting on the need for employment land use.</p> <p>Alternative 2 is more likely to increase the commuting to employment uses outside the borough as new residents use the train stations to access the economic market in London.</p> <p>It is clear that the draft policy and alternatives would all include a policy statement that supports economic growth which would certainly help windfall developments to be delivered. This would have a positive impact but there is a general lack of certainty in the market and the demand for housing could impact on the deliverability of this aspiration. Therefore, all three score an unknown result.</p>
7. To provide for employment opportunities to meet the needs of the local economy.	-	-	-	<p>Despite the draft policy stating that it would provide a range of business and employment floorspace including modern, flexible and well-connected workspaces to increase employment opportunities for residents, the draft policy and both alternatives do not allocate any new employment land or a range of premises to provide employment opportunities. And therefore, minor negative impacts are expected for the draft policy and alternative 2. They are all limited in their ability to support both local and larger scale businesses due to their urban focus and the limited land available for this type of development. This could also have an impact upon the quality and diversity, as well as the future viability of employment development due to limited scope for relocation or expansion these options would provide. There would also be limited scope for diversification in the countryside due to the urban focus and there would only be a small range of additional premises, land, infrastructure and services developed through these options. Alternative 1 includes only 1 allocated site with some additional employment use but this is not significant in size to encourage diversity and quality of employment.</p>

SA Objective	DP	A1	A2	Commentary
8. To reduce greenhouse gas emissions and move to a low carbon economy.	-	-	-	Further growth and development will increase greenhouse gas emissions and hence the draft policy and alternatives scores minor negative results in the short term. As technologies advance and low carbon solutions start to be devised and implemented this could be reduced and therefore neutral or minor positive results could be achieved in the medium to long term. These could have longer lasting energy efficient benefits and would be part of the mitigation plan to overcome the negative score.
9. To use natural resources prudently	-	-	-	The draft policy could encourage the use and supply of sustainable local products and services for mitigation but ultimately meeting the housing need within the urban area will increase the production of waste and it will prove a challenge to use natural resources prudently. This is the same for the alternatives and therefore they all score minor negative results which are anticipated to continue across the duration of the plan.
10. To adapt to the changing climate.	-	+	-	<p>The draft policy and alternative 2 have minor negative impacts expected as the size of the sites in the urban area means that there is less opportunity to provide schemes to adapt to the changing climate. This is not a significant negative impact because schemes such as green roofs, solar panels and on-site combined heat and power could still be delivered.</p> <p>Alternative 1 scores a minor positive impact because larger sites allow large scale renewable energy schemes which could mitigate potential environmental impacts of growth and adapt to the changing climate.</p>
11. To reduce flood risk.	-	-	-	<p>The draft policy and alternative 2 include many urban sites which are in flood zone 2 or have surface water flooding issues. These would not reduce the risk of flooding or run-off on site and other locations. Mitigation could involve small-scale SuDs such as permeable pavements and green roofs, but this would be subject to viability and space allowances per individual site.</p> <p>As well as the urban sites mentioned above, alternative 1 include 9 sites with a minor negative score as the sites falls within flood zone 2 or have a 1 in 30-year chance of surface water flooding. Additionally, Green Belt sites have a larger amount of land, some of which may currently act as a soak-aways and could affect flood risk and run-off rates on site and elsewhere. However, the larger site size could allow SuDS and other flood alleviation schemes to be incorporated into design which could mean it is better able to resist greater flooding extremes.</p>

SA Objective	DP	A1	A2	Commentary
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	-	-	-	Meeting the projected development needs of the borough would require large amounts of water to be provided, including associated infrastructure. This results in expected minor negative impacts for the draft policy and alternatives. Although evidence in the water cycle study suggest that there would be adequate water supply to cater for the growth, demand for water will still require minimising without affecting viability and increasing energy use. This could become more significant in the long term. Mitigation includes detailed policies such as INF6, HOU5 and ENV6 that state developers should ensure new commercial and housing developments are as water efficient as possible, using retrofitting, the linkage of SuDS to infrastructure are made in new schemes and that where possible discharges of surface water are designed to deliver water quality improvements.
13. To reduce land contamination and safeguard soil quality and quantity.	+	-	+	<p>The draft policy and alternative 2 would have a minor positive impact protecting soil and good quality agricultural land due to the concentration of development within the existing built up area. Due to this concentration it would be most likely to remediate contaminated areas which are more likely to exist on PDL sites and not result in further contamination or soil erosion.</p> <p>Alternative 1 scores a minor negative impact as although sites could be remediated within the urban area and not create new areas of contamination, some good quality soil may be used when developing land not previously developed with the 12 Green Belt sites. Some additional soil erosion may occur when developing these sites and so the alternative results in a minor negative score throughout the duration of the plan.</p>
14. To ensure air quality continues to improve and noise and light pollution are reduced.	-	-	-	The draft policy and alternatives are likely to cause air, noise and light pollution rather than reducing it and score minor negative results. It is difficult to ensure people are not exposed to greater levels of noise, light and air pollution when the increase of people and development will inevitably cause that. Larger development schemes for alternative 1 have scope to create tranquil areas and mitigate some of the negative effects. Air quality maybe reduced if residents, employees and visitors use more sustainable methods of transport and when electric cars become affordable and accessible to all. Therefore, the score could change to a neutral or minor positive in the long term for all alternatives.

SA Objective	DP	A1	A2	Commentary
15. To protect and enhance landscape character.	++	-	++	<p>The draft policy and alternative 2 score significant positive results as development will be focussed in the urban area with densities being optimised. It would protect the landscape character of the area by keeping development within the urban area which would also protect the open countryside and the urban fringe. This option would also protect and enhance existing urban greenspace and strategic views and landmarks.</p> <p>Alternative 1 scores a minor negative impact as it includes greenfield land. 6 of the Green belt sites scores significant or minor negative results from evidence in the landscape assessment which identifies sites of high landscape value. Using a mix of urban and Green Belt land could protect the higher quality urban green spaces but it is considered that there would still be a minor negative impact upon the urban fringe, open countryside and important views and landmarks. Therefore, this option scores a minor negative result.</p>
16. To conserve and enhance biodiversity.	+	-	+	<p>The draft policy and alternative 2 score minor positive results as all development will be built in the urban area on previously developed land. Although this will protect existing habitats and prevent fragmentation, it is unlikely to secure enhancement in biodiversity in all new development. This could, however, be achieved on a smaller scale with green roofs etc.</p> <p>Alternative 1 scores a minor negative result as there is likely to be some disturbance to existing habitats when developing the Green Belt. However, this option does not score a significant negative impact as the option could increase connectivity and create more habitats and secure enhancement in biodiversity in all new development.</p> <p>Both the draft policy and alternatives will protect the borough's designated biodiversity areas as no development will be permitted on the SPA or SSSI</p>

Overall Conclusion

The draft policy's will only meet 70% of the housing need and can only provide these on small sites in the urban area, which is unlikely to provide the mix of housing types required. Significant negative impacts are expected for the homes SA objective. There is no mitigation plan for this as the borough does not have large urban sites available to provide the amount and mix of housing required.

Significant positive results are expected for the landscape SA objective as development will be focused in the urban area which would protect the landscape character of the area. Other minor positive results are also expected for the environmental SA objectives as focusing development in the urban area will safeguard soil quality, protect the landscape character of the borough and conserve biodiversity.

The remaining environmental objectives that have scored minor negative results can be mitigated together with policy SS1 and SS2 to make sure new development schemes incorporate opportunities for the delivery of renewable and low carbon schemes, mitigate and adapt to the impacts of climate change and minimise carbon emissions. These three strategic policies work together and will help to ensure future development and growth is sustainable.

Tackling climate change policies

CC1 - Energy efficiency, renewable and low carbon energy

1. To help tackle climate change, developments will be expected to achieve the highest levels of energy efficiency to mitigate the effects of climate change.
2. Development proposals for new housing will be permitted where, as minimum, carbon dioxide emissions are reduced by the Target Emissions Rate (TER) set out in Building Regulations. This reduction should be achieved through the provision of on-site renewable and low-carbon technologies, or by increasing the energy efficiency of the proposed buildings using a 'Fabric First' approach. Where possible development should seek to exceed the TER.
3. The inclusion of localised decentralised energy sources in developments will be supported and local opportunities to contribute towards decentralised energy supply from renewable and low-carbon technologies will be encouraged.
4. The development of carbon neutral/zero carbon developments will be encouraged and supported where they meet the requirements of other policies in this Plan.
5. The highest standards of energy and water efficiency in existing developments will be supported through retrofitting.

Reasoning for the preferred policy
This draft policy (DP) seeks to ensure that all new development and refurbishment is as sustainable as possible to mitigate the impact of development on the environment.
Alternatives
The alternative to test a policy with explicit targets rather than relying on promotion and encouragement was tested for SS1: Tackling climate change so this has not been repeated for this detailed policy.
Consultation comments
Energy efficiency was discussed by respondents in the vision consultation (2020). Many considered that new builds should be of an elite standard of energy efficiency. This would not only reduce energy consumption but also in doing so would reduce carbon dioxide emissions. The idea of energy efficient transport was the focus of others with suggestions including more efficient bus routes and services and the investment in electric charging points around the borough to encourage the use of electric vehicles.
Mitigation measures
There are no negative impacts expected that would warrant mitigation, Reducing carbon emissions by 20% below the target emissions rate set out in Building regulations, may have cost implications but this has been a building regulation requirement for some time already and so should not affect delivery. Completing an Energy Statement for minor and major applications or sustainability checklist for householder applications will ensure that as far as possible, development proposals will meet standards for micro-generation of renewable energy.
Scoped out SA Objectives.

Neutral impacts are expected for SA objectives 3, 4, 5, 7, 9, 11, 12, 13, 14, 15 and 16.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	The draft policy commentary states the need for an energy statement / sustainability checklist. The Viability Assessment 2022 concludes that climate change mitigation should not affect residential development being viably delivered. Therefore a neutral score is expected.
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy provides the detail for improving the energy efficiency of new and existing building. Reducing carbon emissions will improve people's health and well-being and hence scores a minor positive impact.
6. To support economic growth which is inclusive, innovative and sustainable.	+	The draft policy supports economic growth which is sustainable as it states non-residential development will be permitted where BREEAM 'Excellent' construction is met. Therefore, it scores a minor positive impact across the duration of the plan.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	++	The policy aims to reduce carbon emissions, reduce the need for energy use and facilitate the generation and use of renewable energy. It sets out how this can be achieved and the need for applicants to provide the energy statement or sustainability checklists which will ensure that this happens. It therefore scores a significant positive impact across the plan period.
10. To adapt to the changing climate.	++	Improving the quality of the built environment and energy performance of new and existing buildings is a fundamental to adapting to the changing climate. The draft policy provides greater detail on how this can be achieved through exact standards and hence scores a major positive impact.

Overall conclusion

The draft policy has significant positive effects predicated across the duration of the plan for two environmental SA objectives. It also has some minor positive effects in terms of economic sustainability and the health and well-being of the population. This is due to the policy requiring all developments to achieve the highest standards of sustainable design and confirming how this will be done through an energy statement or sustainable checklist.

CC2 - Minimising waste and promoting a circular economy

1. All development proposals will be required to adopt a circular economy approach to building design and construction to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon.

2. Developments will be expected to:

a) Ensure resource efficiency and reduce embodied carbon emissions by sourcing and prioritising materials that can easily be maintained, repaired and renewed across the development lifetime.

b) Minimise the environmental impact of materials by specifying sustainably sourced, low impact and re-used or recycled materials. This should include identifying opportunities for the retention and reuse of existing materials on site (e.g. re-using demolition material on site). Materials should be locally sourced wherever possible to minimise transport emissions.

c) Be designed for durability and flexibility as well as easy disassembly and reuse to minimise waste during the 'in-use' and 'end of life' phases of the development. Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.

Reasoning for the preferred policy
This draft policy (DP) supports the principles of a circular economy and promotes a more effective resource use, to ensure that resources are kept in use for as long as possible and to minimise waste.
Alternatives
The alternative to test a policy with explicit targets rather than relying on promotion and encouragement was tested for SS1: Tackling climate change so this has not been repeated for this detailed policy.
Consultation comments
Although tackling climate change and reducing carbon emissions do feature in all 3 regulation 18 consultations, there are no specific comments relating to minimising waste and promoting a circular economy.
Mitigation measures
The draft policy has no negative impacts to warrant mitigation.
Scoped out SA Objectives.
Neutral impacts are expected for SA objectives 1, 3, 4, 5, 6, 7, 11, 14, 15 and 16.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	As the draft policy will help to reduce embodied carbon emissions by sourcing and prioritising materials that can easily be maintained, repaired and renewed across the development lifetime, it is likely to have a minor positive impact on the health of the community.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	The draft policy seeks to reduce embodied carbon emissions and transport emissions with locally- sourced materials. This will have a minor positive impact on this SA objective.
9. To use natural resources prudently	++	The main purpose of this draft policy is to reduce the environmental impacts of products and services. It aims to minimise the production of waste, encourage the efficient use of minerals and reduce the use of primary resources. It therefore scores a major positive impact across the duration of the plan.
10. To adapt to the changing climate.	+	Minimising waste and promoting a circular economy is an important part in helping adapt to the changing climate. The draft policy provides detail on how this can be achieved and hence scores a minor positive impact.
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	+	As the draft policy aims to use natural resources prudently and minimize pollution, this will improve the water quality of rivers and ground water. It therefore scores a minor positive impact.
13. To reduce land contamination and safeguard soil quality and quantity.	+	This draft policy will reduce the risk of land contamination and prevent more from occurring and therefore minor positive impacts are expected.

Overall conclusion

The draft policy has significant positive effects predicated across the duration of the plan for SA objective 9- to use natural resources prudently. Minor positive effects are also expected for many of the environmental SA objectives that are concerned with reducing carbon emissions and pollution. The use of a sustainability checklist should help to achieve the principle of a circular economy and ensure the prudent use of resources.

CC3 - Sustainable design standards

1. All developments must achieve high standards of sustainable design and construction from new development, change of use, conversions and refurbishments to ensure that all development makes effective use of resources and materials, minimises water use, and assists in meeting carbon reduction targets.

This will be achieved by:

- a) All development must demonstrate that the use of mains water has been minimised by incorporating measures such as smart metering, water saving and recycling measures, including retrofitting.
- b) All major developments and high-water use developments must include water saving measures such as rainwater harvesting and greywater recycling to reduce mains water consumption.
- c) All residential development must meet a minimum internal water efficiency standard of 110 litres per person per day, as set out in Building Regulations Part G or equivalent.
- d) All residential development of 10 or more dwellings must achieve a Home Quality Mark 4 star as a minimum and aim towards achieving a higher mark where possible, or any equivalent new standard.
- e) Proposals for conversion and changes of use to residential for 10 or more dwellings must meet BREEAM UK Domestic Refurbishment 'Excellent' standard or any equivalent new standard.
- f) All non-residential development must achieve a minimum of BREEAM 'Excellent' UK New Construction standard or equivalent, or any equivalent new standard. This standard should be achieved through the provision of on-site renewable and low-carbon technologies, and/or by increasing the energy efficiency of the proposed buildings.

Reasoning for the preferred policy
This draft policy (DP) will ensure that the highest standards of sustainable design and construction should be applied to improve the environmental performance of new development.
Alternatives
The alternative to test a policy with explicit targets rather than relying on promotion and encouragement was tested for SS1: Tackling climate change so this has not been repeated for this detailed policy.
Consultation comments
All 3 regulation 18 consultations contain comments that state new development must be more sustainable.
Mitigation measures
The draft policy has no negative impacts to warrant mitigation.

Scoped out SA Objectives.

Neutral impacts are expected for SA objectives 1, 3, 4, 5, 6, 7, 11, 13, 14, 15 and 16.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	As the draft policy will help to reduce carbon emissions by the provision of on-site renewables, low carbon technologies and energy efficiency schemes, it is likely to have a minor positive impact on the health of the community.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	The draft policy seeks to ensure sustainable design standards including on-site renewables, low carbon technologies and energy efficiency schemes. This will have a minor positive impact on this SA objective.
9. To use natural resources prudently	+	The draft policy aims to ensure that all development makes effective use of resources and materials and therefore scores a major positive impact across the duration of the plan.
10. To adapt to the changing climate.	++	As this draft policy aims to ensure that all development makes effective use of resources and materials, minimises water use, and assists in meeting local and national carbon reduction targets, it scores a major positive impact on this SA objective.
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	++	The policy contains 3 criteria with clear policy direction that will help minimize water use in all developments. It scores a major positive impact as it requires new development to meet the standards.

Overall conclusion

The draft policy has significant positive effects predicated a SA objective 10- to adapt to the changing climate and SA Objective 12- To improve the water quality of rivers and groundwater and maintain an adequate supply of water. This is due to the policy requiring the highest standards of sustainable design and construction to be applied to improve the environmental performance of new development.

CC4 - Sustainable transport

Improved sustainable transport in the borough will be achieved by:

1. New development must contribute to the delivery of an integrated, accessible and safe sustainable transport network, and maximise the use of sustainable transport modes; including walking, cycling and public transport.

2. Development proposals must take account of the following:

Cycling and Walking

a) Promoting active living environments to include the provision of quality, safe and direct routes for cycling and walking that have priority over other forms of traffic;

b) Improving existing cycle and walking routes to local facilities and public transport nodes;

Public Transport

c) Provide and improve public and community transport services;

Other transport modes

d) Provide opportunities to establish car clubs or other similar schemes; and

e) Provide electric vehicle charging facilities situated in convenient and easy to use locations.

3. New development will be required to provide and contribute towards suitable access, transport infrastructure and services that are necessary to make the development acceptable, including the mitigation of any adverse material impacts.

4. New development that will generate significant amounts of movement, such as educational establishments, large business premises or residential developments of 50 homes or more, will be required to prepare and keep up-to-date an on-site Travel Plan associated with the development which contains measures to reduce car use and promote sustainable transport modes.

5. All development proposals will be required to provide cycle and vehicle parking and associated facilities, including electric vehicle charging points in line with the standards set out in the Parking Supplementary Planning Document (SPD).

6. Car free development will be encouraged in appropriate locations and where supported by evidence demonstrating that proposals would not lead to parking stress.

This draft policy seeks to prioritise active and sustainable travel over private motor vehicles. It encourages the use of more sustainable modes of transport and is expected to have a positive impact on improving the population's health, on pollution and transport.
Alternatives
These were tested at the Strategic Options stage in 2016 (Question 29 - Appendix 5).
Consultation comments
Sustainable transport infrastructure was a key theme in all three regulation 18 consultations. Respondents wanted better public transport provision, better accessibility and more sustainable methods of travel such as cycle paths.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 1, 3, 5, 9, 11, 12, 13, 15 and 16.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy's impacts on health are expected to grow increasingly positive over time with active and sustainable travel encouraged.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	The draft policy with a move towards more sustainable modes of travel is expected to have increasingly positive impacts into the future. This seeks to boost sustainable transport networks, public transport and acquire the necessary funding.
6. To support economic growth which is inclusive, innovative and sustainable.	+	The draft policy encourages improved transport links which could result in positive impacts in the long term.
7. To provide for employment opportunities to meet the needs of the local economy.	+	The draft policy encourages improved transport links which could result in positive impacts in the long term.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	The draft policy encourages electric vehicle charging and cycle parking so will help to reduce emissions. It therefore scores a minor positive impact across the duration of the plan.
10. To adapt to the changing climate.	+	A move away from less sustainable modes of transport and the facilitation of active and sustainable travel is expected to positively impact climate change in the long term for the draft policy.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	The draft policy scores a positive impact as travel moves away from the private vehicle and active and sustainable travel is prioritised. This has significant positive impact in the long term as pollution decreases.

Overall conclusion

The draft policy scores minor positive impacts across social, environmental and economic SA objectives. Some of these scores are time dependent and would score major positive impacts once technology advances and pollution decreases.

CC5 - Managing flood risk

To reduce the overall and local risk of flooding and manage water resources:

1. Development must be located, designed and laid out to ensure that it is safe; the risk from flooding is minimised whilst not increasing the risk of flooding elsewhere; and that residual risks are safely managed. Planning permission therefore will only be granted, or land allocated for development where it can be demonstrated that:

a) Through a sequential test it is located in the lowest appropriate flood risk zone in accordance with national policy and the Elmbridge Strategic Flood Risk Assessment (SFRA);

b) It would not constrain the natural function of the flood plain, either by impeding flood flow or reducing storage capacity; and

c) Where sequential and exception tests have been undertaken, any development that takes place where there is a risk of flooding will need to ensure that flood mitigation measures are integrated into the design to minimise the risk to property and life should flooding occur.

2. Permitted development rights for development which could result in a loss of flood storage capacity or impede flood flow will be removed from new developments in flood zone 3, in order to ensure the risk of flooding is not increased through unregulated development.

3. In the event that development takes place in flood zones 2 or 3, the council will require flood resistance and resilience measures in line with current Environment Agency advice and guidance included within the Elmbridge SFRA and Flood Risk Supplementary Planning Document (SPD).

4. Development proposed must attenuate surface water run-off so that the run-off rate is no greater than the run-off prior to development taking place or, if the site is previously developed, development actively reduces run-off rates and volumes.

5. All new development is required to ensure that sustainable drainage systems are used for the management of surface water.

Reasoning for preferred policy

It is important to have a robust local policy that ensures effective flood risk management through the planning system and steers vulnerable development away from areas affected by flooding. It will set specific requirements to minimise the risk over the lifetime

of the development and to increase resilience to flooding events. This approach would significantly reduce the risk of flooding in the borough.
Alternatives
These were tested at the Strategic Options stage in 2016 (Question 28 - Appendix 5).
Consultation comments
Flooding was a key theme in all three regulation 18 consultations. 86% of respondents from the Strategic Options consultation stated that the Local Plan should include a policy providing detailed advice on what is required to limit cumulative impact on small scale development on flood risk. 42% of respondents in the Options consultation stated that flooding needs to be addressed and building on the Green Belt would increase flooding. The Environment Agency provided a detailed response to the vision consultation.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 1, 3, 4, 5, 8, 9, 12, 13, 14,15 and 16.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy ensures that development addresses flood risks accordingly and contributes to a safe and secure environment. Therefore, this will have a positive impact on the health and well-being of the population.
6. To support economic growth which is inclusive, innovative and sustainable.	0	The draft policy will give some protection against flood risk impacts for businesses and employees which will have a neutral impact in the short and medium term, but minor positive impacts are expected in the long term.
7. To provide for employment opportunities to meet the needs of the local economy.	0	The draft policy will give some protection against flood risk impacts for businesses and employees which will have a neutral impact in the short and medium term but minor positive impacts are expected in the long term.
10. To adapt to the changing climate.	+	The draft policy includes measures to alleviate the effects of flooding in relation to climate change which results in a minor positive impact.
11. To reduce flood risk.	+	The draft policy is considered to be a more comprehensive approach to addressing flood risk issues and therefore scores a minor positive result throughout the duration of the plan.

Overall conclusion

The draft policy contains greater detail in terms of how development can reduce the overall and local risk of flooding. This will result in minor positive impacts in terms of people health and safety, adapting to climate change and reducing flood risk.

Protecting and enhancing the quality of the environment

ENV1 - Green and blue infrastructure

1. The council will protect, maintain and enhance the network of accessible, multifunctional green and blue infrastructure across the borough for the biodiversity, recreational, connectivity, and health and wellbeing value it provides and for the contribution it makes towards combating and mitigating climate change impacts.

2. The council will support proposals which meet the identified needs of local communities or provide new connections between existing green and blue infrastructure assets.

3. Opportunities to provide public access to existing or new green and blue spaces will be supported, where this would not result in an unacceptable impact on biodiversity.

3. Development proposals must be designed with green and/or blue infrastructure as an integral component, whether this be by enhancing existing features or providing new assets. Planning applications will be refused where this is not clearly demonstrated.

4. Existing green and blue infrastructure will be safeguarded from development and protected from harm. Development will not be permitted where it causes harm to existing assets, unless it can be demonstrated that the harm arising from the impact on these assets is clearly outweighed by other factors. This will include considering:

a) Any ecological benefit of the feature;

b) Whether the Green and Blue Infrastructure asset provides essential social, community or recreational use; and

c) The extent to which the asset makes a contribution to the environmental quality and distinctive characteristics of the site and wider area.

In such cases, replacement provision of an equivalent or better quality in a suitable location will be required.

5. Development proposals will be refused unless the council is satisfied that the provision of green and/or blue infrastructure cannot be achieved on the site, it will seek to negotiate suitable alternative provision.

6. Landscaping schemes are expected to provide enhancements to green and/or blue infrastructure and should utilise disease-resistant native and/or climate change-resilient species.

7. The provision of new green and/or blue infrastructure features, or the enhancement of existing features, must include provision for their long-term maintenance.

8. There will be a presumption against granting permission for proposals to develop areas of existing open space, but such applications will be determined in accordance with national planning policy and guidance.

Reasoning for preferred draft policy (DP)
The NPPF stipulates that Local Plans and planning policy should set out a strategic approach for the creation, protection, enhancement and management of networks of biodiversity and Green Infrastructure. The draft policy expects development proposals to be designed with green and blue infrastructure as an integral component whether this be by enhancing existing features or providing new assets.
Alternatives
No alternatives have been suggested.
Consultation comments
In the vision consultation, the public felt that there should be greater emphasis on the protection of wildlife, green spaces and woodland areas. There was also support for a more extensive programme of tree planting. Additionally, the use of the rivers was also featured in feedback from the community workshops.
Mitigation measures
There are no negative impacts expected that would warrant mitigation.
Scoped out SA Objectives
Neutral impacts are expected on SA objective 1 (housing), 5 (previously developed land) and 7 (employment opportunities).

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy pays specific attention to local green and blue infrastructure and is expected to boost health and wellbeing in the long term, as developments are required to contribute to a high-quality green and blue infrastructure network. This is expected to enhance healthy lifestyles.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	+	The draft policy provides the opportunity to enhance heritage assets and their setting through the provision of green and blue infrastructure. Over time this will result in positive impacts.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	Positive impacts are expected for the draft policy throughout the duration of the plan. By requiring provision and improvements to be an integral part of all development, this is expected to encourage active and sustainable travel, thus reducing private vehicle use.
6. To support economic growth which is inclusive, innovative and sustainable.	+	The draft policy may attract economic activity to the local area in the long term as development incorporate blue and green infrastructure.

SA Objective	DP	Commentary
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	The draft policy would see existing green spaces protected or re-provided in exceptional circumstances. Additionally, ensuring the provision of new green and blue infrastructure allows greater carbon reduction, cooler and cleaner air. Therefore, this scores a minor positive throughout the plan.
9. To use natural resources prudently	+	The draft policy scores a minor positive result as it aims to use the natural green and blue infrastructure in the borough to protect and enhance biodiversity, provide recreational accessibility, improve health and contribute to climate change.
10. To adapt to the changing climate.	+	The draft policy is more prescriptive in its requirements for green and blue infrastructure and this is expected to offer opportunities to address climate change. Additional planting of trees can help to reduce carbon dioxide levels in the atmosphere therefore positive impacts are expected.
11. To reduce flood risk.	+	The draft policy pays attention to the local context and is expected to provide the opportunity for enhancements to the green and blue environment which in turn could facilitate a higher quality of natural protection against flood risk.
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	+	Positive impacts are expected on water quality through the enhancement of blue infrastructure.
13. To reduce land contamination and safeguard soil quality and quantity.	+	This draft policy will provide opportunities to enhance land and soil quality through the provision of green infrastructure.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	The draft policy is expected to have positive impacts as the provision of green and blue infrastructure could reduce car use and facilitate active travel. This will have added positive effects on air and noise.
15. To protect and enhance landscape character.	++	The draft policy is considered to offer protection and enhancement opportunities to the local landscape through the provision of green and blue infrastructure. Significant positive impacts are therefore expected.
16. To conserve and enhance biodiversity.	++	The draft policy seeks to deliver high quality green and blue infrastructure and therefore significant positive impacts are expected over time.

Overall conclusion

The draft policy has scored positive impacts across the social, economic and environmental objectives. It is considered that SA objective 2, 13 and 16 will become significant positive in the medium and long term as improvements and enhancement to blue and green infrastructure are delivered in the long term. There are no negative impacts that would warrant mitigation.

ENV2 – Landscape, trees and woodlands

1. Development proposals must protect and enhance valued landscapes through reflecting, conserving or enhancing existing landscapes and integrating the development into its surroundings.
2. Development must not result in the loss of, or damage to, ancient trees, trees, woodlands and hedgerows that make or are capable of making a significant contribution to the character or amenities of an area, unless the benefits would clearly outweigh the loss and replacement planting is provided.
3. Proposals will be expected to provide for the protection of existing trees and their root systems prior to, during and after the construction period.
4. Development should make provision for new streets to be tree lined and new trees, which should be sited so as to avoid any negative impacts on highway safety or disruption to underground utilities.
5. Provision should be made for the successful implementation, maintenance and management of planting schemes.

Reasoning for preferred draft policy
To ensure the borough's trees and hedgerows are protected and maintained.
Alternatives
No alternatives have been suggested.
Consultation comments
The planting of trees was a key theme that emerged throughout each of the regulation 18 consultations and most recently the vision community workshops (2020).
Mitigation measures
There are no negative impacts to mitigate.
Scoped out SA Objectives.
Neutral impacts are expected for SA objectives 1, 3, 4, 5, 6, 7, 8, 9, 12, 13 and 14.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	Protecting the borough's trees and hedgerows has a number of benefits that help to facilitate the improved health and well-being of the community. These include reducing stress, removing pollutants and carbon capture. It is therefore likely to have a minor positive impact on the health of the community.
10. To adapt to the changing climate.	+	As trees can prevent flooding, reduce urban temperatures, reduce pollution and keep soil nutrient-rich this draft policy will help in the aim to adapt to climate change and therefore scores a minor positive impact.
11. To reduce flood risk.	+	Trees can prevent flooding and therefore a minor positive impact is expected.

15. To protect and enhance landscape character.	++	The draft policy seeks to retain trees and hedgerows and therefore significant positive impacts are expected over time.
16. To conserve and enhance biodiversity.	++	The draft policy seeks to retain trees and hedgerows and therefore significant positive impacts are expected.

Overall conclusion

The draft policy has significant positive impacts on protecting and enhancing landscape character and biodiversity. It also scores minor positive impacts for adapting to a changing climate and the health and well-being of the community.

ENV3 - Local Green Spaces

1. Areas designated as Local Green Space on the Policies Map will be protected from development, other than in very special circumstances, where the potential harm to the Local Green Space and the purposes of including land within it is clearly outweighed by other considerations.
2. Limited improvements to access, outdoor recreation and wildlife, or community functions associated with the Local Green Space may be allowed where it would maintain or enhance the characteristics for which the Local Green Space was designated.
3. Proposals to enhance an existing community facility associated with or within the boundary of a Local Green Space will be supported, subject to maintaining or enhancing the characteristics for which the Local Green Space was designated and other relevant planning policies.

Reasoning for preferred draft policy (DP)
This will take account of recent evidence on Local Green Space in the borough and will allow the safeguarding and in some circumstances the enhancement which will support investment in the provision of housing, employment opportunities and investment to the borough.
Alternatives
These were tested at the Strategic Options stage in 2016 (Question 22 - Appendix 5).
Consultation comments
Protecting the borough's local green spaces were key themes that emerged throughout each of the regulation 18 consultations and most recently the vision community workshops (2020).
Mitigation measures
There are no negative impacts to mitigate.
Scoped out SA Objectives.

Neutral impacts are expected for SA objectives 1, 3, 5, 8, 9, 12 and 13.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	In safeguarding existing Local Green Space and potentially enhancing its function, better access, outdoor recreation and community events could all have a positive effect on people's health and wellbeing and therefore minor positive effects are expected across the duration of the plan.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	Enhancing Local Green Spaces could improve access. This would allow people more sustainable methods of transport and hence scores a minor positive impact. This is likely to happen in the medium to long term as schemes begin to be implemented.
6. To support economic growth which is inclusive, innovative and sustainable.	+	The draft policy could attract investment and economic growth in the local area due to the quality of Local Green Space and so is likely to have minor positive impacts in the medium and long term as this space is enhanced.
7. To provide for employment opportunities to meet the needs of the local economy.	+	The draft policy could attract investment and economic growth in the local area due to the quality of Local Green Space. This would in turn provide employment opportunities to meet the needs of the local economy and so scores a minor positive, which is more likely to be seen in the medium and long term as this space is enhanced.
10. To adapt to the changing climate.	+	By safeguarding Local Green Space, the draft policy will help to protect the community from the increased extremes of weather and will play a key role in helping local areas adapt to climate change. Therefore, the draft policy scores a minor positive impact across the duration of the plan.
11. To reduce flood risk.	+	The provision and safeguarding of Local Green Space could lead to more permeable land and positively impact the reduction in flooding.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	?	Enhancements to Local Green Space could encourage more sustainable methods of travel helping to improve air quality. However, the details of accessibility improvements depend of the site and its function which could increase noise pollution; however, this is unknown at this stage.
15. To protect and enhance landscape character.	++	The draft policy takes account of local evidence on Local Green Space and considers enhancements and improvements in the local context. This draft policy is considered to have significant positive impacts on protecting and enhancing the boroughs landscape character.

SA Objective	DP	Commentary
16. To conserve and enhance biodiversity.	?	The impacts the draft policy on biodiversity are uncertain at present as land management and enhancements could result in negative or positive impacts on the biodiversity on site, depending on what use is proposed (access paths for example). The level of function has the potential to impact biodiversity.

Overall conclusion

The draft policy has positive impacts across social, economic and environmental SA objectives. However, SA objective 4, 6 and 7 are likely to see neutral impacts in the short term and positive effects as enhancements are made in the medium to long term.

ENV4 - Development in the Green Belt

1. Land which is designated as Green Belt on the Policies Map will be protected against inappropriate development.
2. Exceptions to inappropriate development in the Green Belt are set out in national planning policy. Where development does not fall within one of these exceptions and is therefore inappropriate, permission will not be granted unless very special circumstances, which clearly outweigh the harm to the Green Belt by reason of inappropriateness and any other harm, are demonstrated.

Reasoning for preferred draft policy
This policy will enable ensure Green Belt land in the borough is protected in line with National policy.
Alternatives
This is discussed in full in the main report section B2.
Consultation comments
The protection of the Green Belt featured strongly in all 3 regulation 18 consultations, with the majority of respondents supporting the protection of the Green Belt.
Mitigation Measures
There are no negative impacts to mitigate.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 1, 2, 3, 4, 5, 6, 7,8, 9, 10, 11, 12,1 3, 14 and 16 as this policy is specific in its purpose to protect against inappropriate development within the designated Green Belt.

SA Objective	DP	Commentary
15. To protect and enhance landscape character.	+	Positive impacts are expected on the protection of the landscape. It seeks to protect the Green Belt from inappropriate development and will therefore have a positive effect on the SA objective.

Overall conclusion

Protecting Green Belt land from inappropriate development will have a positive effect on landscape in the short, medium- and long-term duration of the plan.

ENV5 — Thames Basin Heaths Special Protection Area

1. Development proposals which are likely to have a significant effect on the Thames Basin Heaths Special Protection Area will be subject to an appropriate assessment. Applicants will be expected to submit sufficient information to enable such an assessment to be undertaken.

2. Where a development proposal is subject to appropriate assessment, the Council will only grant planning permission if either:

(a) it is satisfied, having taken into account any relevant mitigation or avoidance measures, that the proposal will not adversely affect the integrity of the Thames Basin Heaths Special Protection Areas; or

(b) if the proposal will adversely affect the integrity of the Thames Basin Heaths Special Protection Area, it is satisfied that there are imperative reasons of overriding public interest in favour of granting permission in accordance with the relevant legal requirements.

3. The following zones of influence will apply.

Zone of Influence	Distance from the SPA
A	From 0m to 400m straight line distance from the SPA
B	From 400m to 5km straight line distance from the SPA
C	From 5km to 7km straight line distance from the SPA

These zones of influence are depicted on the policies map. The distances are measured as the crow flies, from the SPA perimeter to the nearest part of the curtilage of the proposed dwelling.

4. The following principles will be applied when the Council is assessing relevant development proposals within these zones of influence under this policy:

(a) Within Zone A, there will be a presumption against the grant of planning permission for development proposals that will result in a net increase in residential units. That presumption will be rebutted only if it can be demonstrated through a site-specific appropriate assessment that there will be no adverse impact on the integrity of the Thames Basin Heaths Special Protection Area.

(b) Within Zone B, development proposals that will result in a net increase in residential units will be required to deliver suitable mitigation and / or avoidance measures in order to address potential adverse effects arising from increased recreational disturbance. Such mitigation measures will consist of:

(i) the provision, improvement and / or maintenance of Suitable Alternative Natural Greenspace (SANG) (or a suitable financial contribution towards the same) and / or

(ii) suitable financial contributions towards Strategic Access Management Monitoring (SAMM) delivered and secured in accordance with the latest version of the Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy and the updated Development Contributions SPD.

(c) Within Zone C, development proposals that will result in a net increase of fifty or more residential units will be assessed on a case by case basis.

Reasoning for preferred draft policy
There is a legal requirement to ensure no adverse impact on the integrity of the TBHSPA, in Elmbridge's case through the agreed mitigation of the provision of Suitable Accessible Natural Greenspace, and maintenance and funding for Strategic Access Management and Monitoring (SAMM). It is therefore considered that there are no reasonable alternatives.
Alternatives
These were tested at the Strategic Options stage in 2016 (Question 23 - Appendix 5).
Consultation comments
The Strategic Options consultation (2016) included a question that asked whether people agreed with the approach to mitigate the impact of new development on the Thames Basin Heath Habitat. 74% of respondents agreed with the approach to mitigate the impact of development on the Thames Basin Heath continued to provide further comment. Many stressed the importance of the Thames Basin Heath habitat, both locally and nationally. The majority felt strongly that measures should be in place to protect biodiversity and areas of ecological value, specifically within the Thames Basin Heath SPA but also more widely. The approach adopted was felt to be a pragmatic approach.
Mitigation measures
Draft policy ENV5 sets out the council's approach to mitigation over the period of the Plan
Scoped out SA Objectives.
Neutral impacts are expected for all SA objectives apart from SA 16 – Biodiversity.

SA Objective	Draft policy	Commentary
16. To conserve and enhance biodiversity.	+	This draft policy will help to ensure that the TBH SPA is protected and therefore scores a minor positive impact across the duration of the plan.

Overall conclusion

The draft policy scores minor positive impacts in terms of conserving and enhancing biodiversity. This is due to the draft policy protecting the Thames Basin Heath special protection area. There are no negative impacts expected however the policy contains much of the avoidance and mitigation strategies required to make sure that development does not harm the protected species in the TBHSPA throughout the duration of the plan.

ENV6 - Protecting, enhancing and recovering biodiversity

1. The council will work with the Surrey Nature Partnership, statutory and voluntary bodies and specialist advisers to conserve and enhance the borough's biodiversity value, contributing towards a national network of wildlife-rich habitats and wider ecological networks to restore nature.
2. Proposals must ensure the conservation and enhancement of internationally, nationally and locally designated sites will be supported. Proposals with the potential to adversely affect these sites will be refused unless clearly justified, in which case a satisfactory mitigation and management strategy will be required. Proposals affecting Special Protection Areas will be considered under policy ENV5.
3. Development proposals must seek to protect, enhance and conserve wildlife habitats and species by creating new natural areas or restoring and enhancing existing habitats.
4. Development proposals must:
 - a) Lead to a net gain in biodiversity of a minimum of 10% on all sites, unless an exemption applies. The achievement of net gain should be informed by an ecological assessment of the site's existing features and development impacts and demonstrated using a net-gain calculator and biodiversity gain plan;
 - b) Protect, conserve and enhance existing biodiversity features and secure their long-term management and maintenance;
 - c) Demonstrate that the proposals have adopted a strict approach to the mitigation hierarchy (i.e. avoid, mitigate, compensate) and are able to justify all unavoidable impacts on biodiversity.
5. Where it is not possible to retain existing biodiversity features, mitigation measures should be identified and secured on-site. In exceptional circumstances where provision of mitigation measures is not possible on-site, compensatory measures involving biodiversity off-setting will be considered.
6. Where development would result in harm to biodiversity, permission will not be granted unless it has been demonstrated that the need for, and the public benefits arising from, the development clearly outweigh the harm. The need to account for a net gain overall will remain

Reasoning for preferred policy
This draft policy (DP) expects development proposals to lead to a net gain in biodiversity of a minimum of 10% on all sites by means of an approved ecological assessment of existing site features and development impacts.
Alternatives
Alternatives were considered in the Strategic Options stage in 2016 (Question 23 - Appendix 5). However this has evolved with legislative changes to the Environment Act in 2021. It now includes alternative (A1) to provide a policy with a higher amount of

biodiversity above that of national policy to respond to the Environment Agency's consultation feedback.
Consultation comments
Respondents from the vision consultation (2020) felt strongly that the council should be protecting and enhancing biodiversity. Some felt that the council should be seeking net gains. The Environment Agency also stated that they would support a minimum 20% target (or the standard minimum, whichever is greater) for biodiversity net gain and the use of Natural England's Biodiversity Metric 2.0 as a way of measuring and accounting for losses and gains.
Mitigation measures
There are no negative impacts expected for the draft policy that would warrant mitigation.
Scoped out SA Objectives.
Neutral impacts are expected for SA objectives 3, 4, 5, 9, 11, 13, 14 and 15.

SA Objective	DP	A1	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	?	-	It is unclear whether this policy could impact the amount of homes being delivered on site. Although evidence suggests that viability should not impact residential delivery, this does depend on trade-offs of policy objectives and the amount of costs for particular sites. A higher percentage of biodiversity for the alternative may have a minor negative impact on providing housing throughout the duration of the plan due to viability.
2. To facilitate the improved health and wellbeing of the whole population.	+	+	Protecting and enhancing biodiversity has the ability to facilitate improved health and well-being for those people living and working in new development schemes. The alternative could have scored a significant effect, but this has moved to a minor positive to take account of the fact that the viability of new schemes could be affected by the higher percentages of biodiversity needed which could stop development and in turn impact on people's health and well-being.
6. To support economic growth which is inclusive, innovative and sustainable.	0	-	In the short term these are all likely to have a neutral impact on economic growth. As the draft policy could provide a viable biodiversity net gain on site this could support economic growth with its environmental benefits, it scores a minor positive which is likely to occur in the medium and long term. The alternative may impact on the viability of providing the employment land use and hence scores a minor negative impact in the medium and short term.

SA Objective	DP	A1	Commentary
7. To provide for employment opportunities to meet the needs of the local economy.	0	-	In the short term these are all likely to have a neutral impact on economic growth and providing employment opportunities. As the draft policy could provide a viable biodiversity net gain on site this could support economic growth with its environmental benefits, it scores a minor positive in the medium and long term. The alternative may impact on the viability of providing the employment land use and hence scores a minor negative impact in the medium and short term.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	++	Providing biodiversity on sites would help to reduce greenhouse gases and the higher the level of biodiversity the greater the positive impacts as seen in the alternative.
10. To adapt to the changing climate.	+	++	Providing biodiversity on sites would help to adapt to climate change and the higher the level of biodiversity the greater the positive impacts as seen in the alternative.
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	+	++	Providing biodiversity on sites would help to improve the water quality of rivers and groundwater and the higher the level of biodiversity the greater the positive impacts as seen in the alternative.
16. To conserve and enhance biodiversity.	+	++	Both seek to conserve and enhance biodiversity and this scores a significant positive effect for the alternative due to the higher percentages of biodiversity net gains.

Overall conclusion

Even though the alternative has the most significant positive impacts across four environmental SA objectives, it does have the most minor negative impacts across social and economic SA objectives. The higher percentage of biodiversity net gain may make the development unviable which would impact on the ability to deliver these positive environmental sustainability objectives.

The draft policy for biodiversity strikes the balance between social, economic and environmental benefits. This appears to be the most reasonable of alternatives and the most sustainable across the duration of the plan.

ENV7 - Environmental quality

1. Development must minimise exposure to, and the emission of, pollutants including noise, odour, light, contamination and water quality. Proposals must:

- a) Incorporate site zoning of pollution sources and receptors to ensure that existing and future occupiers are not subject to unacceptable level of odour pollution, noise, vibration or light disturbance, both within buildings and externally;
- b) Avoid locating noise-sensitive uses close to existing sources of pollutants, unless the impact can be acceptably mitigated; and
- c) Avoid any other adverse site-specific or environmental impacts on humans or wildlife that arise as a consequence of the development. Where these impacts cannot be avoided, appropriate mitigation will be required.

2. Proposals for external lighting will be permitted provided that there would not be an unacceptable impact on biodiversity (including the achievement of net gain) or to the local amenities of the area. Improvements to existing lighting to reduce its environmental impact or to improve energy efficiency will be supported.

3. The re-use of land suspected to be contaminated will be supported where the land can be made safe for the proposed use. Proposals should:

- a) Investigate the nature of the contamination, taking care to avoid the escape of contaminants which could present an environmental risk;
- b) Make provision for remediation measures; and
- c) Take account of ground conditions and land instability.

4. Proposals should seek to improve the quality of watercourses, groundwater and drinking water supplies, and should ensure that any contaminated run-off is prevented. Development proposals must be designed and/ or located to prevent the input of pollutants into water bodies and groundwater.

5. Schemes where adverse impacts cannot be overcome by mitigation will be refused permission.

Reasoning for preferred draft policy
The draft policy (DP) sets out the detailed policy on environmental protection. It seeks to minimise pollution and ensures that development takes account of its local environment and impacts on or to a range of receptors.
Alternatives
No alternatives have been suggested.
Consultation comments

Respondents from all three regulation 18 consultations and the recent community workshops for the vision consultation (20202) said they wanted to see a reduction in pollution, particularly noise and light pollution.

Mitigation measures

No SA objective has scored a minor negative impact and the council will set planning conditions to reduce local environmental impacts on adjacent land uses to acceptable levels. Schemes where unacceptable impacts cannot be overcome by mitigation will be refused.

Scoped out SA Objectives.

Neutral impacts are expected for SA objectives 1, 3, 4, 5, 6, 7, 8, 11 and 15.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy ensures that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land. This scores a minor positive impact in the short and medium term and significant positive impacts are expected in the long term as pollution reduces.
9. To use natural resources prudently	+	The draft policy aims to mitigate or avoid any other adverse site specific or environmental impact that arises as a consequence of the development and this could include waste production. Therefore, this scores a minor positive impact across the duration of the plan.
10. To adapt to the changing climate.	+	The draft policy is more specific about the receptors and what actions are needed to mitigate pollution which will help the borough adapt to climate change. It is expected to see more significant impacts in the long term.
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	+	The draft policy specifically states that development should improve the environmental quality of any watercourse, groundwater and drinking supplies and prevent contaminated run off.
13. To reduce land contamination and safeguard soil quality and quantity.	+	The draft policy states that development should address land contamination by promoting appropriate re-use of sites and requiring the delivery of remediation.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	Minor positive impacts are expected across the duration of the plan. These cannot be major positive results as development will always include some noise and light pollution.
16. To conserve and enhance biodiversity.	+	Reducing light and noise pollution will help to conserve natural habitats and biodiversity and therefore minor positive impacts are expected.

Overall conclusion

The draft policy provides a specific local context and greater detail in terms of what development should do and therefore is expected to have positive impacts in social and environmental SA objectives. As schemes become delivered, it is likely that this will result in significant positive impacts for SA 2 and SA 12 in the long term.

ENV8 - Air quality

1. The design and location of new development must take account of the need to improve air quality in accordance with the borough's latest Air Quality Action Plan, local Air Quality Strategies and Local Transport Plans, as well as national air quality policy and guidance.
2. Development in areas of existing poor air quality, or proposals that might lead to a deterioration in air quality or to an exceedance of the national air quality objectives, either by itself, or in combination with other development, will require the submission of an Air Quality Assessment to be carried out in accordance with industry best practice. This should address:
 - a) The cumulative effect of further emissions;
 - b) The proposed measures of mitigation, using good design, technical solutions and offsetting measures that prevent the deterioration of air quality and ensure that National Air Quality Objectives are not exceeded; and
 - c) The identification of measures to secure the safety and satisfactory quality of life for the future occupiers. Development must not result in an increased exposure to poor air quality, including odour, fumes and dust, particularly where developments might be occupied or used by vulnerable people.
3. All development proposals should promote a shift to the use of sustainable low emission transport modes, to minimise the impact of vehicle emissions on air quality. In doing so, they should provide on-site infrastructure to support these types of transport, including vehicle charging points and adequate cycle storage in accordance with the requirements set out in the update to the Parking Supplementary Planning Document (SPD).

Reasoning for the preferred policy
This sets out the requirements for development proposals to consider air quality, and to ensure any potential negative impacts upon air quality are mitigated.
Alternatives
No alternatives have been suggested.
Consultation comments
Respondents from all three regulation 18 consultations state that improving air quality is a key issue for the borough and feel more needs to be done to reduce congestion. Surrey County Council state in the options consultation that they want to see the impact of development proposals on air quality quantified. Highways England also state that the location of development impacts on the strategic road network and increased traffic levels contributing to poor air quality. They stress for appropriate monitoring and attention to air quality in the future.
Mitigation measures
There are no negative impacts expected from this policy. Implementation of improving air quality needs to be linked to other policies on active travel, design, sustainability and climate change. This will ensure that air quality does improve in the borough.

Scoped out SA Objectives.

Neutral impacts are expected for SA objectives 1, 3, 5, 6, 7, 9, 11, 12, 13 and 15.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy will have minor positive impacts in the short term, but as low emission transport becomes available and more sustainable transport schemes begin to be implemented, major positive impacts would be expected in the long term. This is because cleaner air will help people's respiratory health and incorporating more sustainable methods of transport such as cycling and walking which will help to improve people's physical and mental health.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	The draft policy specially states that major development should promote a shift to use low emission transport. It also states that the location of development must take account of the need to improve air quality, which could include being located close to public transport and in walking and cycling distance to key local services. As schemes become delivered, this could result in significant positive impacts.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	The draft policy aims to reduce emissions so minor positive impacts are expected across the duration of the plan.
10. To adapt to the changing climate.	+	Minor positive impacts are expected in the short term, but as low emission transport becomes available and schemes begin to be implemented with more sustainable methods of transport, this could result in significant positives. This will help the borough adapt to the changing climate.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	++	The draft policy provides greater detail on what measures new development must take to improve air quality and explains the new development must not increase exposure to poor air quality. Therefore, this scores a significant positive across the duration of the plan.
16. To conserve and enhance biodiversity.	+	Minor positive impacts on the conservation and enhancement of biodiversity is expected across the duration of the plan.

Overall conclusion

The draft policy results in significant positive impacts in the long term to take account of new technologies for low emission transport and sustainable methods of transport being available and delivered. Major significant effects are expected for people's health, reducing the need to travel, adapting to climate change and improving air quality in the long term. Having a specific local policy on air quality allows greater direction and clarity of what development proposals should do to address the cumulative effects of further emissions and hence is considered the more sustainable.

ENV9 – Urban design quality

1. All new buildings and places are required to be of a high quality, beautiful and sustainable, and respond positively and enhances the local context to create a visually attractive, distinctive environment that will endure over its lifetime.

2. Development should be consistent with the design principles set out in the National Design Guide and National Model Design Code, on which the forthcoming Elmbridge Design Code will be based. Development that is not well designed will be refused where it fails to reflect government guidance on design and local design policies and the code.

2. The council will pursue a co-ordinated, comprehensive approach to improving the borough's existing public realm. Development will need to demonstrate how it will contribute positively to the public realm and natural environment including the provision of trees in new streets and open spaces.

4. Development must:

a) Encourage and enable sustainable and healthy lifestyles by incorporating public realm, including streets and open spaces, which facilitate the use of active modes of travel such as walking and cycling;

b) Promote community cohesion and wellbeing by creating sustainable spaces and environments that are safe, inclusive and accessible, provide for multi-generational needs and are well-managed and maintained; and

c) Preserve and enhance Elmbridge's special qualities and distinctive character, townscape and landscape and create a strong sense of place by applying the design principles set out in the forthcoming Elmbridge Design Code and the Conservation Area Character Appraisals and Management Plans.

4. Within the allocated sites identified by policies in this Plan, development should take into account the character of the area, and may include innovative designs provided that it is of excellent design quality, raising the standard of design, is visually attractive, promotes high levels of sustainability, and would integrate sensitively into the locality.

5. In assessing the design quality of proposals, particular attention will be paid to the following:

a) Layout (or masterplan);

b) Scale of buildings;

c) Built form and massing;

d) Building height;

- e) Character and appearance
- f) Public realm and amenity spaces;
- g) Landscaping including hard and soft landscaping features
- h) Materials
- l) Detailing;
- i) Accessibility, connectivity and permeability; and
- k) Security and crime prevention measures.

6. All development proposals will be assessed against the further guidance set out in the forthcoming Elmbridge Design Code that will reflect local aspirations.

7. Public and private accessible amenity space must be distinct, safe, inclusive, secure and provide opportunities for social interaction and recreation that contributes to the health and wellbeing of communities. Natural surveillance should be provided for public amenity spaces where practical should to enhance security.

8. Development proposals must include a soft and hard landscaping scheme which effectively integrates the built form into its surroundings and contributes towards the aims of Policies ENV1, ENV2 and ENV6.

9. Development must demonstrate that it is fully adaptable and resilient to the impacts of a changing climate, including overheating, flooding, water shortages/drought and subsidence, and must not exacerbate the impacts of climate change elsewhere.

10. To protect the amenities of existing residents and future occupiers, development proposals must be designed to prevent:

- a) Overlooking, resulting in a loss of privacy;
- b) Lack of outlook or sense of enclosure;
- c) Loss of daylight and sunlight, or overshadowing; and
- d) Disturbance arising from traffic movements.

Reasoning for preferred draft policy (DP)
This policy requires developers and applicants to take a sensitive approach to the architectural design of new buildings, extensions and modifications to existing buildings, as well as landscape proposals. This will ensure all new development will be of a high quality.
Alternatives

Alternatives were explored at the Strategic Options 2016 stage (Question 26 and 27). These have been further developed and addressed in strategic policy SS2.
Consultation comments
The issue of design featured in all 3 regulation 18 consultations. The main comment was that the character of the local area must be respected and retained. There were also many comments that design should be of a high quality, innovative and sustainable. Respondents also suggested the use of design committees, design panels, master plans and design codes.
Mitigation measures
There are no negative impacts to mitigate.
Scoped out SA Objectives.
Neutral impacts are expected for SA objectives 1, 5, 6, 7, 8, 9, 10,11, 12, 13, 14 and 16.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	++	Ensuring a high architectural and urban design quality will impact of people's quality of life. Inclusive design and natural surveillance will help reduce crime. Additionally, well designed public and private space will contribute to the health and wellbeing of communities. As the draft policy explicitly states that it will promote community togetherness and well-being by creating sustainable spaces and environments that are well-managed and maintained, accessible, inclusive and multi-generational, it scores a major positive.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	++	The draft policy states that it will preserve and where possible enhance the borough's distinctive character, townscape and landscape by utilizing the Local Design Code and the Conservation Area Character appraisals. It therefore scores a major positive impact throughout the duration of the plan.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	The draft policy encourages sustainable and healthy lifestyles by incorporating public realm which facilitates the use of active modes of travel.
6. To support economic growth which is inclusive, innovative and sustainable.	+	The draft policy could attract investment and economic growth in the local area due to the quality of urban area and sustainable spaces and environments that are well-managed and maintained, accessible and inclusive. This is likely to have minor positive impacts in the medium and long term as this space is enhanced.
15. To protect and enhance landscape character.	+	Minor positive impacts are expected as the draft policy includes a criterion that states development proposals should include a landscaping scheme which effectively integrates the built form into its surroundings and contributes towards the aims of Policies ENV1, ENV2 and ENV6.

Overall conclusion

The draft policy scores major positive results for the health and well-being of the population

and the heritage SA objective because it promotes well-designed places that reflect local distinctiveness, promote a strong sense of community and provide a high-quality environment for living and working. This is likely to have additional benefits for economic growth, accessibility and landscape character.

ENV10 - Heritage assets

1. The council will give great weight to the conservation of designated heritage assets, assets at risk and non-designated heritage assets and will pursue suitable opportunities for the conservation and enjoyment of the historic environment, recognising its role and contribution in achieving sustainable development.
2. Development proposals should be designed to sustain and, where possible, enhance the significance of these assets and their settings. They should do this by describing the significance of the affected heritage assets and explaining how the proposal has been formed to take this into account. Any negative impact on the significance of a designated heritage asset (whether arising through harm or total loss) must have a clear and convincing justification. The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and national planning policy and guidance.
3. Opportunities to remove buildings or structures which detract from the significance of a heritage asset will be supported.
4. Proposals which would result in the partial or total demolition of buildings or structures within a conservation area will be permitted only where the proposed development would contribute positively to the character and appearance of the conservation area, taking into account any harm which would arise from the loss. In such cases, the proposals for the re-development of the site should be appropriately detailed and shown to be viable.
5. Development proposals should take into account the potential for heritage assets of archaeological importance being present on the site. A desk-based assessment, at a minimum, will be required for sites which are located within Areas of High Archaeological Potential, and for any site outside of these which is greater in area than 0.4ha.

Reasoning for preferred draft policy

Heritage assets are irreplaceable resources and National policy identifies protecting and enhancing the natural, built and historic environment as a key role for the planning system in achieving sustainable development.

The following policy aims to ensure that applicants understand that new development needs to respond to local character and history and integrate into the natural, built and historic environment.

Alternatives

These were tested at the Strategic Options stage in 2016 (Question 24 - Appendix 5).

Consultation comments

The strategic options consultation asked the question: "Do you agree that our strategic and pro-active approach to supporting our heritage assets is appropriate". 76% of respondents agreed and reiterated the importance of the Borough's heritage assets and the need to protect, preserve and enhance them for current and future generations to enjoy.

Mitigation measures

There are no negative impacts to mitigate.
Scoped out SA Objectives.
Neutral impacts are expected for SA objectives 1, 4, 5, 7-16.

	SA Objective	DP	Commentary
2.	To facilitate the improved health and wellbeing of the whole population.	+	In pursuing opportunities for the conservation and enjoyment of the historic environment, the draft policy will have a positive impact on the health and well-being of the whole population.
3.	To conserve and enhance, archaeological, historic and cultural assets and their settings.	++	The draft policy states that heritage assets will be protected and where development proposals affect heritage assets they should be designed to preserve, conserve and enhance the significance of these assets and their settings. It therefore results in a major positive score.
6.	To support economic growth, which is inclusive, innovative and sustainable.	+	A good quality historic environment is attractive to many companies seeking to establish or project their 'brand' or image and their location close to heritage assets helps to support attraction and retention of staff. The draft policy will ensure the protection of the historic environment and therefore a positive impact is expected.

Overall conclusion

Even though the policy will play an important role in terms of achieving sustainable development, no environmental SA objectives have been scored as this policy does not specifically relate to flooding, climate change, land quality or biodiversity for example. It does though have a positive impact on the conservation and enhancement of archaeological, historic and cultural assets and their settings, will support economic growth and will also impact positively on people's health and well-being.

ENV11 – Strategic views

1. Development within Strategic Views will be permitted provided that it has been well-designed to take account of the setting, character and amenity value of the view. Proposals must not obscure or adversely affect these views.
2. Proposals to create new views, or reinstate obscured views, will be supported.

Reasoning for preferred draft policy
To protect existing strategic views as well as supporting new views or reinstating views is important for enhancing and protecting the borough's landscape setting.
Alternatives
No alternatives have been suggested.
Consultation comments
There were no comments received regarding strategic views however many respondents discussed the importance of the borough's landscape in all three regulation 18 consultations.
Mitigation measures
There are no negative impacts to mitigate.
Scoped out SA Objectives.
Neutral impacts are expected for SA objectives 1, 2, 4, 5, 6, 7, 8, 9,10,11,12,13,14,16.

	SA Objective	DP	Commentary
3.	To conserve and enhance, archaeological, historic and cultural assets and their settings.	++	Both strategic views have a historical landmark within the view and therefore the draft policy will enhance and conserve their special interest. It therefore results in a major positive score.
15.	To protect and enhance landscape character.	++	This draft policy aims to protect and enhance a strategic view which have landscape character and therefore a major positive impact is expected for this SA objective.

Overall conclusion

The draft policy ensures that development proposals do not obscure or adversely affect the borough's existing strategic views. It therefore results in a major positive score for SA objective 3 and objective 15.

Delivering homes

HOU1 - Housing delivery

Opportunities for housing growth in Elmbridge will be optimised to deliver a minimum of 452 homes per annum over the plan period.

To achieve this the council will:

1. Adopt a requirement in line with the Elmbridge Housing Trajectory.
2. Deliver a minimum of 30% affordable homes across the plan period.
3. Deliver homes through site allocations as detailed in Chapter 9 and as shown on the Policies Map.
4. Maximise opportunities to increase the supply of additional homes on unallocated suitable and available land.
5. Ensure the efficient use of land by requiring all new residential and mixed-use development to demonstrate that it represents the optimal use of land and density, positively responding to the location and the appearance of the surrounding area. This may include the sub-division and/or redevelopment of large single homes into apartments or redevelopment of those sites to form smaller homes. The council will support infill* housing developments that engage innovative approaches and are compliant with other relevant policies of this Plan.
6. Ensure that new homes are well designed, address different housing needs and provide a variety of housing choices, taking account of the requirements of other policies in this Plan.
7. Work with partners to support the regeneration and renewal of communities and their wider areas.
8. Resisting any developments that involve a net loss of housing, unless it can be demonstrated that the benefits of the development outweigh the harm.

*inclusive of development proposals involving the complete or partial redevelopment of backland and/or residential garden land..

Reasoning for preferred draft policy
This draft policy seeks to achieve an overall housing target which is in line with the Elmbridge Housing Trajectory.
Alternatives
This is discussed in full in the main report section B2.
Consultation comments

Respondents for all three regulation 18 consultations were predominately against meeting the housing need figure from the Government's standard method as many felt the environmental constraints and particularly the Green Belt would be negatively affected by meeting the Government's housing need figure.

Mitigation measures

The draft policy will require mitigation for many of the SA objectives. Development and growth will have negative impacts, some cumulative, across the duration of the plan. These can be mitigated, and this policy will need to work in conjunction with policy SS1, as well as the climate change and environmental policies, to ensure that low carbon technologies and sustainable design helps to reduce the negative impacts that housing delivery could have on the community and environment. There is no mitigation available for not providing sufficient homes as the urban area contain small sites. This cannot be overcome or avoided.

Scoped out SA Objectives

No SA objectives have been scoped out despite four SA objectives scoring neutral results. This is because some explanation is required as these all have potential positives and potential negatives that outweigh each other and so result in a neutral score.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	--	Significant negative impacts are expected because the draft policy will not meet housing need or provide the housing required to enable people to live in a home suitable to their needs and which they can afford. Urban land supply is also likely to become scarcer in the long term. There is no mitigation.
2. To facilitate the improved health and wellbeing of the whole population.	0	The draft policy will not improve the health of the community as it will not improve access to health provisions- these will stay the same. It is not focused on encouraging healthy lifestyles and existing and new residents will have the same access to urban green space as they did previously. Focusing housing delivery in the urban area will though help people to access key services and may help with social inclusion. However, on balance there is no obvious positive or negative impact expected from this draft policy.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	?	There could be opportunities to enhance existing heritage assets through development in the urban area, but this may also alter the setting of some assets in the borough's town and village centres. It is unknown whether new housing development will enhance the borough's heritage assets.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	The draft policy scores a minor positive impact as focussing housing development in the urban area will reduce the need to travel especially by private motorised vehicles. The draft policy on housing provision would allow accessibility to existing services and facilities in the urban area. However, it does not score a significant impact as more development could result in additional congestion.

SA Objective	DP	Commentary
5. To make the best use of previously developed land and existing buildings.	+	The draft policy includes the delivery of housing on previously developed land within the urban area only and hence scores a minor positive impact throughout the duration of the plan. It cannot score a significant positive impact as urban land availability will reduce in the long term.
6. To support economic growth which is inclusive, innovative and sustainable.	+	Even though this policy is intended for housing delivery and does not specially reference economic growth, providing housing in the urban area will help to support the local economy. It will enable key workers to live in the borough and access local work more sustainably. It will contribute to the borough's labour supply, with positive impacts expected.
7. To provide for employment opportunities to meet the needs of the local economy.	+	Providing housing in the borough's urban area will help to support the local economy. It will enable key workers to live in the borough and access local work more sustainably. It will contribute to the borough's labour supply with positive impacts expected.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	-	The draft policy aims to maximise the delivery of housing and any growth will result in higher carbon emissions however with new technologies and the implementation of policy SS1, there should be improvements to this and hence the future impact could be positive.
9. To use natural resources prudently	-	The draft policy could encourage the use and supply of local products and services which may reduce the environmental impact of them. However, household waste will inevitably increase as more housing is delivered. For that reason, the draft policy will have a negative impact across the duration of the plan. The climate change policy CC2 may help mitigate this.
10. To adapt to the changing climate.	0	Although the draft policy will result in population growth which can increase the impacts of climate change, it can also provide the provision of adequate climate change resilient infrastructure to help protect and future proof housing within the area. Working together with SS1 and the climate change policies, it is likely that this policy will have a neutral short-term impact as schemes are being submitted and positive medium- and long-term impacts as schemes are delivered.
11. To reduce flood risk.	0	The draft policy will not reduce flood risk. It does not explicitly mention flood risk but some of the allocated urban sites are in flood zone 2 and have surface water flood issues. Flood resilience measures and the use of the Flooding SPD would help provide mitigation. The policy itself does not present any negative or positive impacts.

SA Objective	DP	Commentary
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	0	The draft policy cannot improve the water quality of rivers and groundwater and maintain an adequate supply of water as more housing will result in increases to water use. The Water Cycle Study 2019 states that this can be minimised and development can work towards becoming water neutral, but this will take time. Therefore, the policy scores a neutral impact to account for the balance between demand and the ability to become water neutral with various water reduction schemes incorporated into the development. Policy HOU5 will help achieve this.
13. To reduce land contamination and safeguard soil quality and quantity.	+	The draft policy prioritises brownfield land and utilises less land overall. The focus on the urban area and unconstrained land is likely to result in some remediation which would result in a positive impact.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	-	Even though the environment policy ENV8 aims to reduce air, noise and light pollution, maximising the delivery of housing is likely to have negative impacts on this SA objective. This could change to positive impacts in the long terms as electric cars and sustainable transport become affordable and accessible, however additional housing in the urban area is likely to increase noise and light pollution.
15. To protect and enhance landscape character.	++	As housing will be delivered in the urban area, the landscape character of the borough will be protected. A significant positive impact is expected across the duration of the plan.
16. To conserve and enhance biodiversity.	+	As the planned housing development will be focussed in the urban area there is less risk of the development causing loss of biodiversity and hence no negative impacts are expected. It does not score a significant positive result as there may be less opportunities to create more habitats and net gains.

Overall conclusion

Although the policy itself is about housing delivery and not location of development, we know that housing will be delivered in the urban area and therefore major and minor positive impacts are witnessed for land contamination, landscape character and biodiversity. It has also scored positive results across many other environmental and the economic SA objectives.

It will be important that this policy is used in conjunction with strategic policy SS1, and detailed climate change policies CC1, 2 and 3 and HOU5 and key environment policies as much of these policies provides the mitigation for the increase in growth and potential negative impacts.

HOU2 - Optimisation of sites

1. Development must make efficient use of land and optimise sites within the urban area of the borough.

2. Sites within or on the edge of* town, district and local centres and sites adjacent to train stations will deliver additional homes by:

a) Provision of higher density housing such as flats and terraced homes rather than semi-detached and detached homes;

b) Infill and backland developments to the rear of existing frontage property(ies);

c) Promoting mixed use development and increased building heights; and

d) Seeking comprehensive development that leads to more efficient and effective site layouts.

* edge of centre as defined by national policy.

3. Within town, district and local centres as defined on the Policies Map and near train stations (as identified in 2 above), development shall be predominantly one- and two- bedroom homes.

Reasoning for preferred draft policy
This draft policy aims to increase the efficient use of land within the urban area and provides details of where optimisation will be expected.
Alternatives
This preferred policy aims to make efficient use of land and optimise sites within the urban area which is originally option 4 and then option 4a as discussed in section B2 alongside the alternatives. In the Strategic Options 2016, question 11 (appendix 5) included options on densities.
Consultation comments
A key issue in the strategic options consultation and options consultation, many respondents supported higher densities in the urban area in order to safeguard the Green Belt. However, there were equal concerns regarding the impact of more infill development at higher densities on the character of existing urban areas.
Mitigation measures
There are no negative impacts expected to warrant mitigation.
Scoped out SA Objectives
SA objectives 9, 10, 11 and 12 have been scoped as the optimisation policy contributes neither positively nor negatively towards these SA objectives.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	The draft policy aims to provide higher density housing such as flats and terrace homes rather than semi-detached and detached homes which will help those in need of this type of housing.
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy could positively impact health and wellbeing as housing supply would be increased particularly near town, district and local centres and key transport links. This would allow people to access retail, health services and community uses more sustainably.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	?	Many of the borough's town, district and local centres are close to heritage assets. Increasing densities may have a negative impact on conservation areas or listed buildings. However, there could be opportunities to enhance existing heritage assets through redevelopment. As the design schemes are not available, the impact is currently unknown.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	Increasing the efficient use of land and optimising sites adjacent to train stations and within more sustainable locations will reduce the need to travel and encourage more sustainable transport methods. This will also increase accessibility to key local services and facilities for future residents.
5. To make the best use of previously developed land and existing buildings.	+	The draft policy aims to increase the efficient use of land within the urban area, infilling and back land development, which makes the best use of previously developed land and hence scores a minor positive impact throughout the duration of the plan. It cannot score a significant positive and urban land is limited in supply.
6. To support economic growth which is inclusive, innovative and sustainable.	+	Optimising housing sites particularly in the borough's town, district and local centres will help to support the local economy. It will enable key workers to live in the borough and access local work more sustainably. It will contribute to the borough's labour supply, with positive impacts expected.
7. To provide for employment opportunities to meet the needs of the local economy.	+	The draft policy is expected to increase housing in the borough's town, district and local centres as well as close to key transport links allowing people to access local work and commute outside the borough more sustainably.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	Increasing the efficient use of land close to key transport links and in town, district and local centres will encourage local people to travel more sustainably for work and local services. This will reduce emissions and have a positive impact on the SA objective.

SA Objective	DP	Commentary
13. To reduce land contamination and safeguard soil quality and quantity.	+	Increasing the efficient use of land within the urban area of the borough and the optimisation of sites, will help to protect good quality soil, prevent soil erosion and minimise the loss of good quality agricultural land.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	Increasing the efficient use of land close to key transport links and in town, district and local centres will encourage local people to travel more sustainably for work and local services. This will help to reduce air pollution. This is likely to have a positive impact on this SA objective.
15. To protect and enhance landscape character.	+	By increasing housing density in the borough's town, district and local centres, the borough landscape character areas will be protected. This results in a minor positive result for this SA objective.
16. To conserve and enhance biodiversity.	+	Increasing the efficient use of land close to key transport links and in town, district and local centres will protect the borough's biodiversity.

Overall conclusion

This draft policy results in many positive scores across the social, economic and environmental SA objectives. This is likely to be a short-term effect as urban sites become more limited.

HOU3 - Housing mix

The delivery of the right homes to address local housing need will be achieved by:

1. All housing development has to take into account and reflect local housing needs in terms of the tenure, size and type of dwellings, as set out in the most recent assessment of local housing need.
2. Emphasis in residential development proposals is placed on the provision of one-, two- and three- bedroom homes suitable for occupation by, for example, newly forming households, young couples, expanding families and older people looking to move to a smaller property.
3. Where the internal layout of a one-, two- or three- bedroom home appears designed to circumvent Policy HOU3 by facilitating subsequent subdivision of large rooms, planning permission may be refused on the grounds that the proposal would be contrary to Policy HOU3.
4. Proposals for alternative forms of housing (e.g. purpose-built housing of multiple occupation (HMOs), live work units or other less conventional housing types), will be considered on their merits, taking into account evidence of how they would help to meet local housing needs and how they would be managed to safeguard the character and amenities of the area in accordance with other Plan policies.
5. Where housing appears to be designed to circumvent policy HOU4 and the provision of affordable housing, planning permission may be refused

Reasoning for preferred draft policy
This preferred draft policy is supportive of the objectives for health and wellbeing and housing. It will ensure that what is delivered closely matches the evidence of need and will provide for mixed inclusive communities.
Alternatives
These were tested at the Strategic Options stage in 2016 (Question 9 and 10 - Appendix 5).
Consultation comments
Many respondents from all 3 regulation 18 consultation commented that the borough had too many 4- bedroom homes and that smaller housing for key workers and the elderly would be beneficial.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
SA objectives 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15 and 16 have been scoped as the housing mix policy contributes neither positively nor negatively towards these SA objectives.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	The draft policy is expected to provide a balanced mix of homes. This would be supported by evidence to ensure that needs are sufficiently met.
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy could positively impact health and wellbeing as housing needs would be sufficiently met. This option seeks to provide dwellings that are adaptable to changing life circumstances therefore population health could be positively impacted.
6. To support economic growth which is inclusive, innovative and sustainable.	+	The draft policy would allow a mix of housing to be provided which would meet the needs of the population. This would allow workers from a range of different sectors and therefore support inclusive economic growth.
7. To provide for employment opportunities to meet the needs of the local economy.	+	The draft policy would allow a mix of housing to be provided which would meet the needs of the population. This would allow key workers to live in the borough and access local job opportunities.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	Providing a mix of homes would encourage people from different work sectors to live in the borough which would prevent longer commutes and associated air pollution from car use. This is likely to have a positive impact on this SA objective.

Overall conclusion

As seen in past years, allowing the market to decide on the type of housing needed does result in expensive 4-bedroom homes and highly paid professionals to dominate the market hence this policy will allow for the right mix of housing to be delivered. Existing policy has already set this in place and so the positive impacts will be seen throughout the duration of the plan.

HOU4 - Affordable housing

1. The council will require proposals to provide affordable homes on all residential developments comprising self-contained units, including but not limited to where housing for older people, age-restricted market housing, retirement living/sheltered housing or extra care is provided, as follows:

a) On brownfield sites of 10 or more new units, on-site provision of 30% affordable housing of the gross number of dwellings;

b) On greenfield sites of 10 or more new units, on-site provision of 40% affordable housing of the gross number of dwellings; and

c) On sites of 9 or less units, a financial contribution equivalent to the provision of 20% affordable housing of the gross number of dwellings.

2. The provision of affordable housing will be required on-site. Only in exceptional circumstances, and subject to applicants providing a full justification for example, where it would secure better outcomes in meeting the borough's affordable housing needs, will an alternative to on-site provision be considered.

3. Affordable housing provision will be expected to incorporate a mix of dwelling types, sizes and tenure, and should reflect the type of housing required in the most up-to-date evidence of housing need for the borough, having regard to the form and type of development appropriate for the site. 25% of all affordable housing will be First Homes. The rest (75%) of the affordable housing will provide affordable housing in line with the identified need in the council's latest housing need assessment. All affordable housing should be genuinely affordable, with the cost substantially lower than 30% below local market prices and rents.

4. Judgements about the level, tenure and mix of affordable housing will have regard to:

a) The identified need in the council's latest housing need assessment and the council's Housing Strategy; and

b) The overall viability of the scheme and any site-specific abnormal costs.

5. Where a site has been sub-divided or is not being developed to its full potential, so as to circumvent the affordable housing threshold for on-site provision, the council will seek a level of affordable housing provision that would have been achieved on the site as a whole had it come forward as a single scheme.

6. The affordable homes should be designed to be fully integrated into the open market housing on a tenure blind basis and comply with other policies in the Plan.

7. Self and custom build residential developments are subject to the policy requirements of HOU4 in relation to affordable housing contributions. However, on schemes relating to 1 net gain, a self-build exemption can be applied for.

8. Where the council agrees a lower affordable housing provision, it reserves the right through a legal agreement to require a review mechanism to reassess the viability of a site at different stages of the development.

9. Affordable housing is not required where a residential scheme relates wholly to Gypsy, Roma, Traveller or Travelling Showpeople accommodation, mobile home sites, ancillary accommodation used incidentally to a main dwelling, staff accommodation used ancillary to the main use of the premises, river boat moorings or student accommodation.

Reasoning for Preferred draft policy
This draft policy sets the threshold for schemes of 10 or more units according to viability evidence to ensure that all development can realistically provide an appropriate level of affordable housing.
Alternatives
These were tested at the Strategic Options stage in 2016 (Question 13 - Appendix 5).
Consultation comments
A substantial number of respondents in each of the three regulation 18 consultations comment on the lack of affordable housing within the borough and the need to address this to meet the needs of younger and older people.
Mitigation measures
There are no negative impacts to mitigate for this policy.
Scoped out SA Objectives
SA objectives 3 to 16 have been scoped out as it is considered that the affordable housing policy contributes neither positively nor negatively towards these SA objectives.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	The draft policy will ensure affordable housing is provided.
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy is expected to have a positive impact on reducing social exclusion by seeking to integrate affordable housing throughout development sites.

Overall conclusion

The preferred draft policy would have a positive impact on both housing provision and the health and well-being of the population as it aims to provide affordable housing on larger sites where viability will not be affected.

HOU5 - Housing technical standards

Liveable, functional, adaptable and accessible new homes, including those resulting from changes of use and conversions, will be delivered by meeting the following requirements:

1. All new homes must provide sufficient internal space and ceiling heights to cater for future occupants. The gross internal floor area for each new home should meet or exceed the Nationally Described Space Standard, or any subsequent equivalent standard.
2. All new homes must have rooms, layouts and storage areas which are functional and fit for their purpose, meeting the changing needs of occupiers over their lifetimes and supporting more sustainable lifestyles including homeworking.
3. Proposals will demonstrate how all habitable rooms are provided with an adequate level of visual and acoustic privacy in relation to neighbouring properties and uses, the street and other public spaces.
4. All new homes should be dual aspect, unless there are exceptional circumstances that justify the inclusion of any single-aspect homes. Single aspect homes that are north facing or are exposed to noise levels that would lead to significant adverse impact on health and quality of life will not be permitted.
5. New homes should achieve a minimum average daylight factor (ADF) target of 1 per cent for a bedroom and 1.5 per cent for a living room.
6. All new homes, including flatted developments, should have access to an element of private outdoor amenity space of quality, proportionate to the size of home and which maximises the availability of sunlight and natural light. Balconies will count towards private amenity space.
7. A minimum of 10% of new homes will be required to meet Building Regulations standard M4 (2) 'accessible and adaptable dwellings' on sites of 10 or more new homes. Additionally, a minimum of 5% of new homes will be required to meet Building Regulations standard M4 (3) 'wheelchair user dwellings' to help meet the specific needs of older people and those with mobility, accessibility and support needs on sites of 20 or more new homes. The number of homes provided to meet the specified standards should be rounded up to the nearest whole home.

Reasoning for preferred draft policy
This policy sets out the technical requirements needed to ensure quality homes and living environments in the borough. National planning policy states that local policies relating to the sustainability of buildings should reflect the optional technical requirements set out by the Government and this policy does that.
Alternatives
No alternatives have been suggested.
Consultation comments
Many respondents comment that sustainable quality homes should be built in the borough.

Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
SA objectives 1, 3, 5, 6, 7, 8, 9, 11, 12, 13, 14, and 15 have been scoped as the technical standards policy contributes neither positively nor negatively towards these SA objectives.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	++	Ensuring developments are livable, functional, adaptable and accessible will help to improve people's health and well-being. This will result in a significant positive impact for the preferred draft policy as this encourages exceeding national policy and building regulations.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	++	Providing a sufficient level of internal space can help facilitate home working and minimise the need to travel. Significant positive impacts are expected due to the draft policy exceeding standards.
10. To adapt to the changing climate.	+	Encouraging outdoor amenity space such as gardens and green roofs can help to adapt to climate change.
16. To conserve and enhance biodiversity.	+	Outdoor spaces and green roofs have biodiversity benefits so both score positive impacts across the duration of the plan.

Overall conclusion

The draft policy sets out very clearly how new development needs to consider several areas from space standards, layouts, visual and acoustic privacy, daylight, orientation, private space, accessibility and adaptability. This results in significantly positive effects across both social and environmental objectives.

Developments which consider matters of inclusive design, accessibility and technical requirements at an early stage of and throughout the development process are the most successful at achieving quality homes and living environments.

HOU6 - Specialist accommodation

To deliver housing choice in the borough and specialist forms of accommodation that meet local needs:

1. Development for specialist accommodation, including older person's housing, will only be permitted where there is clear and robust evidence that demonstrates a local need for the new accommodation, the type and level of care it offers, and does not result in an over provision of that particular type of accommodation and care within the borough.
2. Developments providing older persons' accommodation shall deliver the level of affordable housing required by Policy HOU4.
3. All new developments shall achieve the standards of accessibility set out on Policy HOU5 as a minimum.
4. The council will support the long-term ambition to expand the almshouses and care provision in Whiteley Village. A long-term development aspiration shall be delivered via a masterplan through working in partnership with the Trust..

Reasoning for preferred draft policy
A policy that aims to deliver housing choice in the borough and specialist forms of accommodation that meet local needs should be effective and respond to needs in a timely manner as it would be based on available evidence. It also provides certainty as to the provision of accommodation.
Alternatives
These were tested at the Strategic Options stage in 2016 (Question 15 - Appendix 5).
Consultation comments
The strategic options regulation 18 consultation includes a specific question on specialist housing. Respondents stated the need to address the requirements of the elderly, particularly ensuring the provision of affordable residential care. Almost all respondents stressed that residential care for the elderly must be affordable and not built to luxury standards.
Mitigation measures
There are no negative impacts to mitigate for the draft policy.
Scoped out SA Objectives
SA objectives 3 to 16 have been scoped out as it is considered that the policy contributes neither positively nor negatively towards these SA objectives.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	The draft policy will ensure that local need is met and will not result in an over provision which could impact on housing supply and affordable housing. This will have a positive impact on the SA objective.
2. To facilitate the improved health and wellbeing of the whole population.	+	Making sure specialist housing does meet the required need and the correct level of care is supplied will have a positive impact of people's health and well-being.

Overall conclusion

The draft policy is intended to make sure that the borough does not over-supply specialist housing. Past delivery and the pipeline of current permissions and development under construction indicates a likely over provision of some types of specialist accommodation and hence this policy aims to make sure that specialist forms of accommodation meet local needs. Therefore, the draft policy scores positive impacts on the supply of housing generally and the health and wellbeing of people which is expected throughout the duration of the plan.

HOU7 - Gypsy, Roma, Traveller and Travelling Showpeople accommodation

1. Proposals for the delivery of Gypsy, Roma and Traveller pitches and Travelling Showpeople's plots will be required to meet the following criteria:

- a) The location of the site provides a safe living environment free from the risk of flooding and risks to health through contamination, noise, vibration, odour and pollution;
- b) The site is in a sustainable location with access to local services and facilitates such as shops, public transport, and schools;
- c) There is easy and safe access to the strategic road network and safe and convenient vehicle and pedestrian access to the site and, should not lead to an adverse impact on the road network or endanger highway safety;
- d) The site is capable of being provided with on-site services such as water supply, sewage disposal and power supply;
- e) The layout of the site provides an acceptable living environment for occupants, including sufficient space to meet fire safety standards as well as allowing for parking and vehicle maneuvering on-site and the provision of private and communal amenity space; and
- f) The site is laid out and landscaped in a manner which is compatible with the visual character of the area and amenities of neighboring uses.

2. Existing authorised sites will be safeguarded unless no longer required to meet identified needs.

Reasoning for preferred draft policy (DP)
Having a criteria-based policy that ensures new sites are located in sustainable locations and that meet various criteria such as health and safety, will allow Gypsy, Roma and Traveller pitches to be provided in the right place with the correct provisions.
Alternatives
These were tested at the Strategic Options stage in 2016 (Question 14 - Appendix 5).
Consultation comments
The strategic options consultation did include a question about meeting the accommodation needs of non- travelling Travellers, however respondents struggled to answer the question due to its technical nature. Overall, respondents stated that the council should not provide any more accommodation for Travellers in the Borough whether they travel or not.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
SA objectives 3 to 16 have been scoped out as it is considered that the policy contributes neither positively nor negatively towards these SA objectives.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	The draft policy's aim is to ensure new pitches are provided in sustainable locations with access to local services and facilities. Making sure new pitches are delivered in safe and accessible locations would help meet this SA objective to enable people to live in a home suitable for their needs. It therefore scores a minor positive impact throughout the duration of the plan.
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy will improve access to health provision and help to overcome social exclusion by ensuring new Traveller sites/pitches are located in safe and sustainable locations. It also includes policy on increased security of pitches and plots, acceptable living environments, amenity spaces and key infrastructure provision which in turn will facilitate improved health and well-being of this population.

Overall conclusion

The draft policy scores minor positive impacts as the criteria helps to ensure the location of new pitches are accessible and safe and existing pitches are safeguarded unless no longer required to meet need. This will have a positive impact on the health and well-being on this population.

HOU8 - Self and custom build housing

1. The council will support proposals for self and custom build housing on residential development sites in locations where there is a demonstrable demand for plots and other relevant planning policies are satisfied.
2. Proposals shall deliver the level of affordable housing required by Policy HOU4.
3. All self and custom build housing developments shall achieve the technical standards as set out in Policy HOU5 as a minimum..

Reasoning for preferred draft policy (DP).
This draft policy supports proposals for self and custom build housing on residential development sites in locations where there is a demonstrable demand for plots and other relevant planning policies are satisfied.
Alternatives
No alternatives have been suggested.
Consultation comments
Respondents to the strategic options regulation 18 consultations state that there is a need for more self-build and custom-build plots.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
SA objectives 3 to 16 have been scoped out as it is considered that the self and custom build housing policy contributes neither positively nor negatively towards these SA objectives.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	The draft policy supports proposals for self and custom build housing on residential development sites in locations where there is a demonstrable demand for plots and other relevant planning policies are satisfied. Therefore, a minor positive impact on the homes SA objective is expected.
2. To facilitate the improved health and wellbeing of the whole population.	0	Provision of self and custom build housing is expected to have neutral impacts in the short and medium term, however adverse impacts may increase for the wider population in the long term, as land take for this use may reduce the supply to meet the needs of other groups in the community.

Overall conclusion

Self and custom build housing is considered to be a 'desirable' form of housing provision rather than a 'need'. As such, the results are limited in terms of meeting the Sustainability Appraisal objectives. The draft policy could result in minor negative impacts in the long term as custom housing could prevent other forms of housing to be built which could impact on the health and well-being of the population. The policy would require monitoring to make

sure that this not become the case.

Growing a prosperous economy

ECO1 - Supporting the economy

1. Opportunities for economic growth in Elmbridge will be taken by maintaining and optimising the use of the borough's employment floorspace offer. This will be done by protecting employment land and encouraging its innovative re-use in ways that better meet the needs of the market.
2. Development proposals for the provision of smaller and incubator office space, flexible workspaces for co-working, and Small and Medium Enterprises (SMEs) will be supported in the most sustainable locations, in particular in town, district and local centres. Development proposals will be permitted where they:
 - a) Deliver high quality, well-designed flexible and adaptable spaces of different unit sizes and; types for a range of uses and occupants as part of mixed-use development; and
 - b) speculative developments for which there is no identified end user will be expected to be supported by a marketing strategy for the use and occupation of the employment spaces to be delivered.
3. Outside of Strategic Employment Land (SEL) (as defined on the Policies Map) the loss of floorspace occupied by employment-generating uses will only be permitted where it is demonstrated that:
 - a) There is no reasonable prospect of the site being retained in employment use;
 - b) The site is no longer suitable for its existing use or other employment uses;
 - c) The existing use creates (or any other employment use would create) significant amenity issues for neighbouring occupiers, best remedied by encouraging a replacement with a non-employment use; and
 - d) The development provides opportunities for sustainable co-location with other non-employment uses.
4. Proposals on sites which provide mixed-use opportunities will be expected to optimise the use of the land to meet the needs of the economy, to support job creation and business growth, and to meet other development needs which support the community.
5. Ensuring that the development of up to date vocational training facilities is encouraged to enable local people to train to obtain the skills necessary to support employers with premises within the borough.

Reasoning for preferred draft policy (DP)
This policy will ensure employment land is protected so that the local economy can be inclusive, innovative and sustainable.
Alternatives
There are no reasonable alternatives as this preferred policy meets the objective of the plan.
Consultation comments
The strategic options regulation 18 consultation contained a number of specific questions about the local economy. The main response was that of flexibility and mixed-use developments that could adapt to changing needs and be more sustainable in the long term.
Mitigation measures
There are no significant negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
Neutral impacts are expected on SA objective 1, 8, 9, 10, 11, 12, 13, 14, 15 and 16.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy encourages mixed use development and flexible workspaces. This could have a positive impact on people health and well-being as they access work with shorter and more sustainable daily commutes.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	?	There is potential to impact on the setting of heritage assets, particularly in the borough's town and village locations, however this is largely dependent upon how employment and mixed-use schemes are implemented. Currently, the likely effects are unknown.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	The draft policy seeks to direct office space, SMEs and flexible workspaces to town and village centre locations, which could facilitate and encourage a shift to more sustainable modes of travel and also reduce the need to travel. It therefore scores a minor positive impact.
5. To make the best use of previously developed land and existing buildings.	+	The draft policy encourages opportunities to re-use, repurpose land and optimise mixed use developments to meet needs of the economy. This will have a positive impact on making the best use of PDL.
6. To support economic growth which is inclusive, innovative and sustainable.	+	The draft policy supports the economy and provides the information needed to make sure employment floorspace is maintained and intensified. Therefore, this draft policy scores a minor positive result.

SA Objective	DP	Commentary
7. To provide for employment opportunities to meet the needs of the local economy.	+	The draft policy supports job creation and therefore helps to meet the needs of the local economy and so scores a minor positive impact.

Overall conclusion

The draft policy scores positive impacts across social, economic and environmental SA objectives as it seeks to maintain and intensify the borough's employment floorspace. It does not have any negative impacts as the policy includes using mixed use development so that residential and employment can work together. This has benefits in terms of sustainable methods of transport, health and well-being and the use of previously developed land.

ECO2 - Strategic Employment Land

1. Strategic Employment Land (SEL - as indicated on the Policies Map) will be safeguarded for employment uses to support and retain employment opportunities in locations attractive to businesses. Development in SEL will be supported if it would be occupied by the following uses:

- a) Office and work space
- b) Light industry
- c) General industry
- d) Storage and distribution

Ancillary uses to the above, hybrid and flexible uses that lever in investment and improvements to the SEL will be supported, provided they reinforce and supplement the function, role and operations of employment uses.

2. Development in SEL will be supported where:

- a) There would be no net loss in employment floorspace capacity;
- b) It is of high-quality design, modern, fit for purpose and results in improvements to the quality of buildings and infrastructure;
- c) There would be efficient use of space, through innovative design which allows for flexible floorspace for different types of uses to meet future needs; and
- d) It does not lead to an unacceptable impact on the surrounding highway network or local amenity.

3. Increases in employment floorspace capacity will be supported where they are achieved through the supply of new multi-storey units, the sub-division of larger units and new smaller units.

4. Residential accommodation in SELs will only be acceptable if it forms part of a larger redevelopment proposal and:

- a) It would bring investment to floorspace which has been demonstrated to be redundant for employment uses; and
- b) The proposal would comprise a mix of flexible uses.

Reasoning for preferred draft policy (DP)
This policy safeguards strategic employment land and sets out clearly the development and uses that will be supported. The Council's evidence demonstrates that there is a need for specific employment uses and providing this will allow for sustainable economic growth in suitable locations.
Alternatives
An alternative to not protect SEL and let the market decide the uses is not considered reasonable as it would not achieve the principle for growing a prosperous economy. These were tested at the Strategic Options stage in 2016 (Question 16 and 17 - Appendix 5).
Consultation comments
The Strategic Options regulation 18 consultation asked whether people agreed that the council should seek to protect the most important and strategic employment areas from redevelopment to uses other than offices, warehousing and factories. 68% said no. Respondents felt that mixed uses were better than employment only sites.
Mitigation measures
There are no significant negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 3, 4, 8, 9, 10, 11, 12, 13, 14, 15 and 16.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	-	The draft policy is designed to protect and safeguard this land for economic use only and hence it will not provide housing and therefore scores a minor negative result.
2. To facilitate the improved health and wellbeing of the whole population.	+	Minor positive impacts are expected as the draft policy is trying to protect this land so that key employment uses are safeguarded. This provides local labour and being employed lifts people's well-being. It also keeps light industrial uses away from residential areas which also has health benefits.
5. To make the best use of previously developed land and existing buildings.	+	The draft policy supports the sub-division of larger units and new multi- storey units on existing sites and therefore this policy does make the best use of PDL and scores a minor positive impact.
6. To support economic growth which is inclusive, innovative and sustainable.	+	Safeguarding SEL for particular employment uses will support economic growth, which is inclusive, innovative and sustainable. This scores a minor positive impact.
7. To provide for employment opportunities to meet the needs of the local economy.	+	Safeguarding SEL will provide employment opportunities to meet the needs of the local economy and hence scores a minor positive impact.

Overall conclusion

Although the draft policy scores a negative result for providing sufficient housing, it does score four minor positive impacts for health, using previously developed land and

encouraging economic growth and employment opportunities. The draft policy is considered sustainable as it is safeguarding land that is more appropriate for employment uses. If this land is not protected other land uses could result in no more employment development which would negatively impact on local job opportunities, create more outward commuting for work and effect economic growth in the borough.

ECO3 - Supporting our town, district and local centres

1. A range of retail, office, residential, community, cultural and leisure uses in the borough's town, district and local centres (as identified on the Policies Map) will be supported.
2. The core activity areas within the town centres, as defined on the Policies Map, will comprise retail, office, community, cultural and leisure uses that maintain an active frontage and enhance the resilience and attraction of the centre.
3. The loss of retail, office, leisure and community uses at ground floor level to residential in the core activity area will be resisted.
4. Positive consideration will be given to temporary, flexible meantime and pop-up uses within vacant units which can attract footfall to the centre.
5. Mixed-use developments which contribute to increasing footfall and vibrancy, and proposals to bring under-used upper floors into more effective use will be supported, subject to their compliance with the requirements of Policies HOU2 (where residential use is proposed) and ECO1.
7. New uses that contribute to the vitality of the evening economy will be supported, unless they result in a harmful impact on residential amenity or on the health of our communities.

Reasoning for preferred policy
This policy will take account of the local context and will support the vitality and viability of the borough's town, district and local centres.
Alternatives
These were tested at the Strategic Options stage in 2016 (Question 21 - Appendix 5).
Consultation comments
The Strategic Option regulation 18 consultation asked whether the policy on focusing new retail development to town, district and local centres should be maintained. 84% said yes. However, respondents felt that the council should not continue to protect primary shopping areas from other uses as set out in the current Core Strategy. They believed that the High Street should contain a mix of uses including retail, housing and small businesses.
Mitigation measures

There are no negative impacts to mitigate for the preferred draft policy.

Scoped out SA Objectives

Neutral impacts are expected on SA objectives 9, 10, 11, and 16.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	The draft policy supports appropriately designed and located proposals for residential development on upper floors therefore some positive impacts are expected.
2. To facilitate the improved health and wellbeing of the whole population.	+	As the draft policy support a wide range of uses includes community facilities, leisure and health services, this could improve the quality of life of those residents living in and close by to these centres. Therefore, this policy scores a positive impact.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	?	The draft policy has the potential to impact the townscape and setting of heritage assets however this is largely dependent upon how schemes are implemented.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	The draft policy seeks to boost the vitality of the town centre which could increase travel into it, however increased local services within the town centres may facilitate and encourage a shift to more sustainable modes of travel and reduce the need to travel.
5. To make the best use of previously developed land and existing buildings.	++	Major positive impacts are expected as existing uses are converted and first floors changed to include residential.
6. To support economic growth which is inclusive, innovative and sustainable.	+	The draft policy seeks to boost the vitality of the town and village centres which is expected to increase economic growth in Elmbridge.
7. To provide for employment opportunities to meet the needs of the local economy.	+	The draft policy seeks to boost the vitality of the borough's town, district and local centres which is expected to provide for employment opportunities to meet the needs of the local economy.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	Promoting a range of different uses in the borough's town, district and local centres could help create more sustainable transport methods and so could reduce greenhouse gases from privately motorised vehicles.

SA Objective	DP	Commentary
13. To reduce land contamination and safeguard soil quality and quantity.	+	As the policy is concerned with making better use of the existing retail centres, this should reduce land contamination and safeguard social quality and quantity.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	The draft policy could result in better air quality as people access shops and services without having to drive to larger shopping centres.
15. To protect and enhance landscape character.	+	Focusing development in the boroughs town, district and local centres would protect the landscape character. This would have positive impacts for the draft policy and alternative.

Overall conclusion

The draft policy scores minor positive impacts across the social, economic and many of the environmental policies. This is because this policy aims to make the borough's town, district and local centres more attractive and distinctive. In doing so, this will help residents access key community, health and leisure uses as well as retail uses locally which prevents reliance on the private car and longer journeys. This will improve people quality of life and protect the environment and hence is considered the most sustainable.

ECO4 - Promoting visitor attractions and arts and cultural venues

1. The loss of visitor attractions or arts and cultural venues will be resisted unless it is demonstrated that the facility is no longer needed for its existing purpose. In such cases, first consideration should be given to whether the attraction or venue could be used for a leisure, social or community purpose.
2. Support will be given to proposals that demonstrate that the attraction or venue can be re-provided in a facility of better quality on the same site, or in an alternative location that is equally accessible to the community it serves.
3. New attractions and venues will be supported within the borough in the following ways:
 - a) New arts, cultural, entertainment and visitor facilities will be directed to town, district and local centre locations and areas accessible by public transport or safe active travel routes;
 - b) The use of outdoor space and the public realm for art, culture, sports and entertainment will be encouraged and supported in accessible areas and town, district and local centres; and
 - c) Where appropriate, social and community facilities will be encouraged to use the space for arts and cultural events.
4. Development proposals for visitor accommodation should be located in sustainable locations and be accessible by public transport.

Reasoning for preferred draft policy (DP)
This draft policy is considered to have a positive impact on the population's health and encourages enjoyment of cultural venues and events.
Alternatives
No alternatives have been suggested.
Consultation comments
The strategic options consultation touched on visitor attractions and included reference to Sandown racecourse. Comments were limited but in general people felt that there is no reason for increasing accommodation to support visitor attractions.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 8, 9, 11, 13, 14, 15 and 16.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	The draft policy aims to protect the loss of existing visitor attractions and support new facilities where appropriate. This could compete for land in terms of housing, but it is unlikely to dominate the market and could be part of mixed-use development with residential alongside therefore neutral impacts are expected on providing sufficient housing.
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy seeks to improve arts, culture, entertainment and visitor facilities in town centres, which will allow a large population of people to access these which will have a positive impact on people's health and well-being as they can enjoy leisure pursuits in their free time. This results in a minor positive impact throughout the duration of the plan.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	?	There is potential to impact on the setting of heritage assets, particularly with the draft policy's focus on the borough's town and village locations, however this is largely dependent upon how schemes are designed.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	The draft policy seeks to direct new arts, culture and entertainment facilities to town and village centre locations, which could facilitate and encourage a shift to more sustainable modes of travel and reduce the need to travel. It therefore scores a minor positive impact.
5. To make the best use of previously developed land and existing buildings.	+	The draft policy states that that new and existing social and community infrastructure will be encouraged to use the space for arts and cultural events in line with the principles of co-location to ensure efficient use of land. Therefore, the draft policy scores a minor positive impact.
6. To support economic growth which is inclusive, innovative and sustainable.	+	The draft policy supports new attractions and venues which will help to support the local economy. Directing these to town, district and local centres will also support sustainable economic growth. This draft policy scores a minor positive result.
7. To provide for employment opportunities to meet the needs of the local economy.	+	Employment opportunities will be created by supporting new arts and cultural venues. This will help meet the needs of the local economy and so scores a minor positive impact.
10. To adapt to the changing climate.	?	The impacts on adapting to climate change are as this is largely dependent on how development is delivered.

SA Objective	DP	Commentary
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	?	The impacts on water are as this is largely dependent on how development is delivered.

Overall conclusion

The draft policy scores positive impacts across social, environmental and economic SA objectives. Promoting visitor attractions and cultural venues especially in town and village locations enables more sustainable methods of transport and helps people access these facilities. This will help with the population's health and wellbeing as well as support the local economy. There are no negative impacts reported as its unlikely that arts and cultural venues would compete with housing and its more likely that these will form mixed use developments to help the diversity and sustainability of the borough's town, district and local centres.

ECO5 – Equestrian-related development

1. Equestrian-related development will be permitted providing:

- a) It is of a scale and intensity compatible with the location and satisfactorily relates to existing vehicular and field accesses, tracks and bridleways;
- b) The proposal includes the re-use of existing building(s) wherever practicable and viable;
- c) The design responds to local identity and distinctiveness, including location and siting, any subdivision of field(s) and earthworks; and
- d) The location of new buildings, stables, yard areas and associated facilities respect the amenities of surrounding occupiers.

2. Where a site is located in the Green Belt, the proposal will be expected to accord with Policy ENV4.

Reasoning for preferred draft policy
This draft policy will provide the detail required to assess proposed equestrian related development.
Alternatives
No alternatives have been suggested.
Consultation comments
None of the previous regulation 18 consultations contained options on equestrian related development.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 1, 3, 4, 8, 9, 10, 11, 12 13 and 14.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy provides the detail for proposed equestrian related development. Although horse riding is expensive and therefore not available to every Elmbridge resident it is a popular sport within the borough and other areas of Surrey. This may encourage people to access the countryside and participate in outdoor activities and so has a minor positive impact on health and well-being.
5. To make the best use of previously developed land and existing buildings.	+	The draft policy states that development will be permitted if it includes the re-use of existing buildings wherever practicable and viable. Therefore, this scores a minor positive impact.

SA Objective	DP	Commentary
6. To support economic growth which is inclusive, innovative and sustainable.	+	The policy provides the detail required for developing liveries, stables and facilities for the public to use. Supporting these local businesses, the policy would have a minor positive on economic growth.
7. To provide for employment opportunities to meet the needs of the local economy.	+	The draft policy allows for the development of liveries, stables and facilities which would provide local employment opportunities. Therefore, the draft policy scores a minor positive impact.
15. To protect and enhance landscape character.	+	The draft policy ensures that any new sites or developments associated with existing uses are of an appropriate scale do not have a detrimental impact on the landscape. Therefore, it scores a minor positive impact.
16. To conserve and enhance biodiversity.	+	The draft policy also protects biodiversity and provides an opportunity to develop the existing green infrastructure network and so scores a minor positive impact.

Overall conclusion

The draft policy helps to maintain public access to a range of recreation and leisure activities and takes account of the popularity of equestrian activity. This policy will help to increase the number of equine facilities and therefore improve health and wellbeing for those taking part in such activities, as well as helping to give more of the community an opportunity to access the countryside. Equine related business can also provide job opportunities for some parts of the community.

INF1 - Infrastructure delivery

1. The council will work in partnership with providers of infrastructure and services to facilitate the timely provision of infrastructure necessary to support sustainable development in the borough, and in addressing pressures from cross boundary development.
2. The council will engage proactively with partners and relevant authorities to support strategic infrastructure projects to deliver benefits to the borough's environment, residents and businesses and which assist to achieve the principles of the Plan.
3. The council will maintain an up to date Infrastructure Delivery Plan (IDP) and will support infrastructure development proposals identified in the IDP where they comply with other policies in the Plan.
4. The council will use the Local Plan, IDP and the Strategic Priority Programme to bid for funding necessary to support development, working in partnership with Surrey County Council, the Local Economic Partnership (LEP), the Local Nature Partnership (LNP), and other bodies as appropriate.
5. All new developments must contribute towards the provision of infrastructure and services. The infrastructure necessary to support new development should either be provided on-site, integral to the development, or be secured off-site through other mechanisms. In the case of major development, phased delivery may be required, and later phases may be dependent on the infrastructure provision being in place.
6. New development will be expected to demonstrate capacity in existing infrastructure where no improvements are proposed as part of the development, either on-site or through a financial mechanism.

Reasoning for preferred draft policy (DP)
Including a policy on infrastructure provision will ensure infrastructure will be delivered when it is needed and that in some instances will be provided during or before development to take account of a gradual increase in population or where early mitigation is required. This also recognises that the council will need to work with a range of infrastructure providers to ensure the timely delivery of facilities/ services. This approach ensures development contributes to infrastructure provision.
Alternatives
No alternatives have been suggested.
Consultation comments
Infrastructure was a key issue raised at all three regulation 18 consultations. Respondents stated that new development will impact on existing infrastructure provision, developers should contribute to infrastructure provision and that the council should work closely with infrastructure partners to deliver improvements.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 3, 5, 6, 7, 8, 9, 10, 13, 15 and 16.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	The draft policy would not boost the supply of housing.
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy will have a positive impact on local service provision such as health care and schools as it will facilitate infrastructure provision when and where needed.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	Minor positive impacts are expected as new transport infrastructure will be provided to support development.
11. To reduce flood risk.	+	The draft policy will have positive impacts on flood defences because it facilitates infrastructure provision when needed.
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	+	The draft policy would provide water management and water utilities infrastructure to facilitate development. It scores a minor positive impact due to the thresholds for delivery.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	?	It is unknown whether the draft policy could support active travel.

Overall conclusion

The draft policy scores positive results in health and well-being, transport, flood risk and water. By ensuring that infrastructure is delivered in partnership with the providers and relevant authorities, the council will be able to support and make sure that it is delivered in a timely manner. There are of course some unknown impacts as it is difficult to predict how schemes will be delivered at this stage, but this policy has the greater chance in delivering this rather than relying on national guidance.

INF2 - Social and community infrastructure

1. The council will support the provision of new social and community infrastructure particularly where they make an efficient use of land and promote the dual use and/or co-location of facilities.
2. New social and community infrastructure must be of a high quality and inclusive design providing access for all, and where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.
3. Development proposals that would result in the unnecessary loss of community facilities will not be permitted unless it can be demonstrated that:
 - a) that there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or
 - b) they will be replaced by alternative and well-located facilities that will continue to serve the similar needs of the neighbourhood and wider community; and
 - c) the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed.

Reasoning for preferred draft policy (DP)
A policy that resists the loss or change of use of existing social and community services will ensure that important social and community uses are retained and protected for key services.
Alternatives
No alternatives have been suggested.
Consultation comments
Respondents in the Strategic Options Regulation 18 consultation were concerned about a loss of community facilities and stated that this was a key challenge for Elmbridge. There were also comments that there should be more investment in community facilities.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 and 16.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	++	Making sure the borough's existing social and community infrastructure is maintained will help to facilitate the improved health and well-being of the population and so scores a significant positive result.

Overall conclusion

This draft policy will make sure that the borough's existing social and community services are retained and protected. This will continue to have major positive impacts throughout the lifetime of the plan.

INF3 – Health and wellbeing of communities

1. Developments must contribute to healthy and active lifestyles through the provision of:

a) Active design principles which support wellbeing and greater physical movement, and an inclusive development layout and public realm that considers the needs of all, including the older population and people with disabilities;

b) Access to sustainable modes of travel, including safe, well-designed, and attractive cycling and walking routes and easy access to public transport to reduce car dependency;

c) Access to safe and accessible green infrastructure, including to blue corridors, open spaces and leisure, recreation and play facilities to encourage physical activity; and

d) Access to local community facilities, services and shops, which encourage opportunities for social interaction and active living.

2. The council will require a Health Impact Assessment (HIA) setting out the expected effects on health, wellbeing and safety, from all major development.

3. All development subject to HIA (in 2 above) must demonstrate how the positive health impacts it can deliver are maximised, and reduce and/or mitigate negative health impacts, with a particular regard to removing health inequalities. Where unavoidable negative impacts on health, wellbeing and safety are identified, mitigation measures must be incorporated into the proposal.

Reasoning for preferred draft policy
A policy that aims to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles is crucial to improving the health and well-being of residents in the borough.
Alternatives
No alternatives have been suggested.
Consultation comments
Respondents in the Strategic Options Regulation 18 consultation stated that access to green spaces was important to peoples' health and well-being.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 1, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 and 16.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	++	The draft policy expects development proposals to contribute to healthy and active lifestyles through the provision of active design principles, access to sustainable modes of travel, access to green infrastructure and a requirement for HIA on large developments would result in a significant positive impact on this SA objective

SA Objective	DP	Commentary
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	++	The draft policy seeks to ensure that development proposal contribute to ensuring access to sustainable modes of travel, including safe cycling routes, attractive walking route and easy access to public transport to reduce car dependency. As well as access to green infrastructure, including blue corridors it also promotes open spaces, leisure, recreation and play facilities to encourage physical activity; and access to local community facilities, services and shops, which encourage opportunities for social interaction and active living.

Overall conclusion

This draft policy will make sure that future development contributes to healthy and active lifestyles through a range of provisions. This will have major positive impacts throughout the lifetime of the plan

INF4 - Play and informal recreation space

1. New residential development that is likely to be used by children and young people must take account of the need to provide space and/or access to suitable play and informal recreation space. The council will seek additional or enhanced play facilities or space by:

- a) Promoting opportunities for informal play within open spaces where it is not possible to secure formal play areas.
- b) Requiring external play space and facilities on site as part of new residential developments which include 50 or more family units (those with 2 or more bedrooms); and
- c) Protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
- d) Where the creation of new play facilities is not feasible, requiring developers to work with the council to deliver enhanced provision nearby.

2. Play and informal recreation space designed in new residential developments should incorporate good-quality, accessible play provision for all ages and physical abilities, that:

- a) Provides a stimulating environment;
- b) Can be accessed safely from the street by children and young people independently;
- c) Forms an integral part of the development and surrounding area;
- d) Is overlooked to enable passive surveillance; and
- e) Is not segregated by tenure.

3. Where access to existing space is proposed, new development schemes should incorporate accessible routes for children and young people, that enable them to play and move around safely and independently.

4. Major housing developments of over 50 units are expected to make appropriate provision of play space. In determining the amount of play space required the council will consider the type of development, amount, quality, and use of existing accessible provision of play space, as well as the anticipated child yield of the development.

Reasoning for preferred draft policy
To include a policy on the provision of high quality, inclusive and accessible play space as well as additional or enhanced play facilities/ space will ensure that new residential development provide accessible and inclusive play space either on site or nearby.
Alternatives
No alternatives have been suggested.
Consultation comments
Respondents to the Strategic Options and Options regulation 18 consultations stated that playing fields should be improved and play space protected.

Respondents to the Vision regulation 18 consultation talked about the importance to providing outdoor space for children to play in new residential development. Respondents commented that this was crucial to children's health and well-being.
Mitigation measures
There are no negative impacts expected to warrant mitigation.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 and 16.

SA Objective	DP	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	?	The draft policy ensures that new play space is provided for new residential development over a particular size, which is likely to have cost implications to build and maintain. An individual viability assessment would be required to apply sensitivity testing to a range of costs and therefore the objective scores an unknown at this stage.
2. To facilitate the improved health and wellbeing of the whole population.	++	Increased physical activity contributes to healthy growth and development in children and young people, as well as improved psychological wellbeing and social interaction. The draft policy therefore scores a significant positive impact throughout the duration of the plan.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	The draft policy states that play space must be accessible. Providing play provision on site reduces the need to travel and so this policy scores a minor positive result.

Overall conclusion

Overall, the policy is positive as it will ensure play space is protected, enhanced and created where necessary. This will help facilitate the improved health and wellbeing of the population and increase accessibility to important facilities for young people.

INF5 - Communications

1. All new build residential and commercial developments must include full fibre broad band connections to each property.
2. The council will support the roll out of the 5G network across the borough and the enhancement of existing connectivity infrastructure.
3. Telecommunications proposals will be supported where they are accompanied by evidence that there are no alternative suitable infrastructure sites that can be shared or replaced, and the visual and amenity impact is minimised by the considered siting and design of the development.

Reasoning for preferred draft policy
To include a policy that ensures all new build residential and commercial development must have full fibre broad band connection to each property is vital to the delivery of sustainable development.
Alternatives
No alternatives have been suggested.
Consultation comments
Respondents to the Strategic Options regulation 18 consultation talked about the need to plan high speed broadband. The Vision consultation included questions on growing a prosperous economy and respondents stated that improved broadband networking and faster broadband would ensure greater opportunities to work from home.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 1, 3, 5, 9, 10, 11, 12, 13, 15 and 16.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy will ensure that all new build residential and commercial development have full fibre broad band to each property allowing greater opportunities for home working. This will impact positively on the environment as there will be less motorised vehicles on the road. Improving air quality will improve the whole populations health and well-being.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	++	As the draft policy will allow more people to work from home, this will have significant positive effects on reducing the need to travel.

SA Objective	DP	Commentary
6. To support economic growth which is inclusive, innovative and sustainable.	+	The draft policy states that all new build residential and commercial developments must include full fibre broad band connections to each property. This will enable local businesses to have the best technological advances and ensure opportunities for work from home are available. This will support sustainable economic growth and therefore has a minor positive impact throughout the duration of the plan.
7. To provide for employment opportunities to meet the needs of the local economy.	+	As the draft policy provides the technological infrastructure in new commercial properties as well as existing networks, this policy will have a positive impact on employment opportunities to meet the needs of the local economy.
8. To reduce greenhouse gas emissions and move to a low carbon economy.	+	Providing the opportunity to work from home, the draft policy will have a positive impact on this SA objective as traffic is reduced and gas emissions decrease.
10. To adapt to the changing climate.	+	The draft policy will help to adapt to climate change as more people work from home and less pollutants enter the atmosphere. This will have a positive impact on the SA objective.
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	The draft policy will allow greater numbers of people to work from home which will help to reduce air quality. Therefore, this scores a minor positive result.

Overall conclusion

The draft policy set out how high-quality digital infrastructure is expected to be delivered and upgraded over time and prioritises full fibre connections to existing and new developments. It therefore scores minor positive across many of the social, economic and environmental SA objectives. In particular, it scores a major positive impact in term of reducing the need to travel as greater opportunities for working from home is delivered.

INF6 - Rivers

1. The special character and setting of the River Thames will be conserved and enhanced, and appropriate development proposals associated with river related activities and employment will be supported, provided they accord with other policies in this Plan.
2. The council will support and promote new links across the river which support active and sustainable travel and leisure uses of the river.
3. The council supports proposals for the wider River Thames Scheme and will work proactively with partners to deliver improvements. Land at Desborough Island will be safeguarded for the creation of new habitat.
4. Opportunities to increase the use of the river for tourism and improving river-based and riverside recreation and leisure activities will be supported where appropriate and they meet other policies in the Plan.
5. Proposals for riverside development and improved facilities will need to demonstrate that there will be no unacceptable impact upon navigation, biodiversity, flood risk and the riverbank and landscape setting.
6. Development proposals on the riverside must preserve or enhance the waterside character, heritage value and setting, and provide physical and visual links with the surrounding areas (including views along the river).
7. Development proposals that are contain or are adjacent to watercourses should consider the impact that development can have on them and provide a buffer from the river bank.
8. New moorings or other floating structures will be supported if it complies with the following criteria:
 - a) It does not harm the character, openness and views of the river, by virtue of its design and height;
 - b) The visitor mooring allows use for a period of less than 24 hours;
 - c) There is no interference with the recreational use of the river, riverside and navigation; and
 - d) The proposal is of wider benefit to the community.

Reasoning for preferred draft policy
A policy on the River Thames covering mooring, navigation, character, recreation and design factors will enable the council to consider impacts on the wider River Thames when making decisions and recognise the positive impacts it has on the environment, economic opportunities it presents and social benefits.
Alternatives

No alternatives have been suggested.
Consultation comments
The borough's rivers featured in all three regulation 18 consultations responses. Residents value highly the riverside for its character, environmental benefits and recreation use. Respondents were keen that rivers are protected, flooding is prevented and that the rivers ecosystems can thrive. The Environment Agency provided detailed comments on river use.
Mitigation measures
There are no negative impacts to mitigate for the preferred draft policy.
Scoped out SA Objectives
Neutral impacts are expected on SA objectives 1, 5, 8, 9, 10, 11, 12, 13 and 14.

SA Objective	DP	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	+	The draft policy supports river related activities, river recreation and leisure activities. All of which will help to facilitate improved health and well-being of the population and hence scores a minor positive impact.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	+	The draft policy specifically states that development proposals should preserve or enhance the waterside character, heritage value and setting. It therefore scores a minor positive impact.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	The draft policy states that the council will support and promote new links across the river which support active and sustainable travel and leisure uses of the river. This will have a minor positive impact on the SA objective.
6. To support economic growth which is inclusive, innovative and sustainable.	+	The draft policy states that development proposals associated with river related activities and employment will be supported. A minor positive score is given as it will support economic growth.
7. To provide for employment opportunities to meet the needs of the local economy.	+	As the draft policy will support riverside employment uses, this will provide local employment opportunities and therefore has a minor positive score.
15. To protect and enhance landscape character.	++	The draft policy is clear that the special character and setting on the River Thames will be conserved and enhanced and that development proposal will not negatively impact on landscape setting. It therefore scores a significant positive impact on this SA objective.
16. To conserve and enhance biodiversity.	+	The draft policy states that proposals for riverside development will need to demonstrate that there will be no unacceptable impact on biodiversity and therefore scores a minor positive result.

Overall conclusion

The draft policy provide greater detail on the protection and promotion of riverside uses and

therefore scores a minor positive result across social, economic and environmental SA objectives. A significant positive impact is expected on landscape character as the policy states that landscape character of the riverside will be conserved and enhanced. This policy provides specific detail to help guide development.

Appendix 4: SA summary for site allocation policies

Claygate

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
US3	Torrington Lodge Car Park, Hare Lane	+	0	++	++	+	0	0	+	0	+	+	+
US156	Garages to the rear of Foxwarren, Claygate	+	0	-	++	+	0	0	+	0	0	+	+
US155	Garages to the rear of Holroyd Road	+	0	-	++	+	0	0	+	0	+	+	+
US2	Hare Lane Car Park, Hare Lane	+	?	++	++	+	0	0	+	0	0	+	+
US175	Claygate Centre, Elm Road	+	0	+	++	+	0	0	+	0	0	+	+
US6	Crown House, Church Road	+	?	+	++	+	--	0	+	0	0	+	+
US169	Claygate Station Car Park, The Parade	+	0	++	++	+	0	0	+	++	-	+	+

Cobham

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
US492	Cedar House, Mill Road	+	?	+	++	+	-	-	+	0	0	+	+
US497	Cedar Road Car Park, Cedar Road	+	0	+	++	+	0	0	+	0	0	+	+
US162	Site B Garages at Wyndham Avenue	+	0	+	++	+	0	0	+	0	+	+	+
US159	Garages to the rear of 16-24 Lockhart Road	+	0	+	++	+	0	0	+	0	+	+	+
US165	Garages at Waverley Road	+	0	0	++	0	0	-	+	0	0	?	0
US472	40 Fairmile Lane	+	0	--	++	-	0	0	+	0	0	0	+
US521	4 Fernhill	+	0	0	++	++	0	0	+	0	0	0	+
US522	52 Fairmile Lane	+	0	--	++	-	0	0	+	0	0	0	+
US523	Pineview, Fairmile Lane	+	0	-	0	+	0	0	+	0	+	+	-
US530	Garage block, Middleton Road	+	0	0	++	+	0	0	+	0	+	0	+
US160	Garages at Bennett Close	+	0	+	++	+	0	0	+	++	+	+	+
US193	Glenelm and 160 Anyard Roads	+	0	++	++	+	-	-	+	0	0	+	+
US460	1, 3 and 5 Goldrings Road, Oxshott	+	0	+	++	+	0	0	+	0	0	+	0
US195	Cobham Village Hall and Centre for the Community,	+	0	++	++	++	0	0	+	0	0	0	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	Lushington Drive												
US187	87 Portsmouth Road	+	0	+	++	+	--	0	+	0	0	+	+
US164	Cobham Health Centre and Garages off Tartar Road	+	0	+	++	+	+	0	+	++	+	+	+
US493	Selden Cottage and Ronmar, Leatherhead Road	+	0	-	++	+	0	0	+	0	0	0	0
US191	73 Between Streets	+	?	0	++	+	-	0	+	0	0	0	+
US124	St Andrew's Church, Oakshade Road, Oxshott	+	?	+	++	0	0	-	+	0	0	0	+
US467	Ambleside, 3 The Spinney, Queens Drive, Oxshott	+	0	-	++	+	0	0	+	0	0	+	0
US218	Coveham House, Downside Bridge Road and The Royal British Legion, Hollyhedge Road	+	0	+	++	++	-	0	+	++	0	+	+
US190	Shell Fairmile, 270 Portsmouth Road	+	0	+	++	+	--	0	+	0	0	+	+
US217	68 Between Streets and 7-11 White Lion Gate	+	0	+	++	+	-	0	+	++	0	+	+
US214	Above Waitrose, 16-	+	0	+	++	++	0	0	+	++	0	0	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	18 Between Streets												
US221	Garages and parking to the rear of Cobham Gate	+	0	+	++	++	0	0	+	0	0	+	+
US201	Tiltwood Care Home, Hogshill Lane, Cobham	+	0	+	++	++	+	0	+	0	0	0	+
US188	Ford Garage, 97 Portsmouth Road	+	?	+	++	+	--	0	+	0	0	?	+
US189	Premier Service Station, 101 Portsmouth Road	+	0	++	++	+	--	0	+	0	0	?	+
US194	Protech House, Copse Road	+	0	+	++	+	--	0	+	++	0	+	+
US215	38 Copse Road	+	0	+	++	+	--	0	+	0	0	+	+
US7	20 Stoke Road, Cobham	+	0	0	++	+	0	0	+	0	0	0	+
US178	Sainsbury's car park, Bridge Way	+	0	+	++	+	0	0	+	++	0	0	0
US183	BMW Cobham, 18-22 Portsmouth Road	+	?	+	++	+	--	0	+	0	0	0	+
US121	Oxshott Medical Practice and Village Centre Hall, Holtwood Road	+	?	+	++	0	0	-	+	0	0	0	+
US186	78 Portsmouth	+	0	+	++	+	--	0	+	++	0	?	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	Road, Cobham												

Dittons

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
US245	Brook House, Portsmouth Road, Thames Ditton	+	0	+	++	++	-	0	+	++	0	+	+
US230	Car Park south of Southbank, Thorkhill Road, Thames Ditton	+	0	+	++	++	0	0	+	0	0	+	+
US254	4-6 Manor Road South and 4 Greenways, Hinchley Wood	+	0	++	++	+	0	0	+	0	--	+	+
US506	Land to the rear of 5 Hinchley Way, Esher	+	0	+	0	+	0	-	+	0	0	0	-
US503	89-90 Woodfield Road, Thames Ditton	+	0	+	++	+	0	-	+	++	0	+	+
US462	Sundial House, The	+	0	+	0	+	0	-	-	++	0	0	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	Molesey Venture, Orchard Lane, East Molesey												
US443	47 Portsmouth Road, Thames Ditton	+	?	+	++	+	-	-	+	0	0	+	+
US443	Torrington, 18-20 St Mary's Road, Long Ditton	+	0	+	++	+	0	0	+	0	+	+	+
US495	Corner Cottage, Portsmouth Road	+	0	++	++	+	0	-	+	0	0	+	+
US516	Bransby Lodge, St Leonard's Road, Thames Ditton	+	0	++	++	+	0	0	+	0	0	+	+
US159	Garages to the rear of Blair Avenue, Weston Green	+	0	0	++	+	0	-	+	++	0	0	0
US226	Sandpiper, Newlands Avenue, Thames Ditton	+	0	+	0	+	0	0	+	0	0	+	+
US518	Thames Ditton Centre for the Community, Mercer Close, Thames Ditton	+	0	++	++	+	0	0	+	0	0	+	+
US18	British Legion, Betts Way, Long Ditton	+	0	+	++	+	0	0	+	0	0	0	0
US24	Flats 9-41 and Garages on Longmead Road, Thames Ditton	+	0	+	++	+	0	0	+	++	0	0	+
US237	Ashley Road Car Park,	+	?	+	++	+	0	-	+	0	0	0	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	Thames Ditton												
US232	Nuffield Health Club, Simpson Way, Long Ditton	+	?	+	++	++	0	0	+	++	0	+	+
US271	118-120 Bridge Road East Molesey	+	?	+	++	+	-	0	+	++	0	+	+
US272	Industrial units at 67 Summer Road East Molesey	+	0	+	++	+	-	-	+	++	0	+	+
US248	School Bungalow, Mercer Close, Thames Ditton	+	0	++	0	+	0	0	+	0	0	+	-
US233	Nuffield Health car park, Simpson Way, Long Ditton	+	?	+	++	++	0	0	+	++	0	+	+
US260	46 St Marys Road, Long Ditton	+	0	+	++	+	0	0	+	0	0	+	+
US251	Old Pauline Sports Ground Car Park	+	?	+	++	+	0	0	+	0	0	0	+
US250	Community centres at the junction of Mercer Close and Watts Road, Thames Ditton	+	?	++	++	+	-	0	+	0	0	+	+
US265	5A-6A Station Road, Esher	+	0	0	++	+	--	-	+	++	-	+	+

Esher

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
US279	Esher Place, 30 Esher Place Avenue	+	?	+	++	+	0	0	+	0	0	0	0
US127	30 Copsem Lane, Esher	+	0	0	++	+	0	0	+	0	0	?	0
US283	1-5 Millbourne Lane, Esher	+	0	+	++	+	0	0	+	0	0	+	+
US134	Hanover Cottage 6 Claremont Lane, Esher	+	0	+	++	+	0	0	+	0	0	+	+
US146	35 New Road, Esher	+	0	+	++	+	0	0	+	0	0	+	+
US481	6 Bracondale and 43 Claremont Lane	+	0	+	++	+	0	-	+	0	0	+	+
US475	Willow House, Mayfair House and Amberhurst, Claremont Lane, Esher	+	0	+	++	+	0	0	+	0	0	+	+
US286	Highwaymans Cottage Car Park,	+	?	+	++	+	0	0	+	0	0	+	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	Portsmouth Road, Esher												
US276	Cafe Rouge, Portsmouth Road, Esher,	+	?	+	++	+	0	-	+	0	0	0	+
US526	40 New Road	+	0	+	++	+	0	-	+	0	0	+	+
US278	45 More Lane, Esher	+	0	+	++	+	0	0	+	0	0	0	+
US157	101-153 Farm Road, Esher	+	0	0	0	+	0	-	+	++	0	0	-
US282	42 New Road Esher	+	0	+	++	+	0	0	+	0	0	+	+
US274	Two Furlongs and Wren House, Portsmouth Road, Esher	+	?	+	++	+	--	0	+	0	0	0	0
US39	Unit A & B Sandown Industrial Park, Esher	+	0	+	++	+	--	0	+	++	0	+	+
US33	River Mole Business Park, Mill Road, Esher	++	0	+	++	+	--	0	+	++	0	-	+
US38	Units C and D, Sandown Industrial Park, Mill Road	+	0	+	++	+	--	0	+	++	0	+	+
US32	Windsor House 34-40 High Street	+	?	+	++	+	-	0	+	++	--	+	+
US288	Hawkshill Place Portsmouth Road, Esher	+	?	0	++	+	0	0	+	0	0	0	+
US27	81 High Street, Esher	+	?	+	++	+	0	0	+	0	--	+	+
US519	Esher Library and land adjoining, Church Street, Esher	+	?	+	++	+	0	0	+	0	-	+	+
US287	15 Clare Hill Esher	+	0	0	++	+	0	0	+	0	0	0	+
US280	St Andrews	+	0	+	++	+	-	0	+	0	0	+	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	and Hillbrow House, Portsmouth Road, Esher												
US531	Civic Centre, High Street, Esher	++	?	+	++	+	-	0	+	+	-	+	+

Hersham

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
US441	63 Queens Road	+	0	+	++	++	-	0	+	0	0	+	+
US489	19 Old Esher Road	+	0	++	++	++	0	0	+	0	0	+	+
US379	Hersham Shopping Centre, Molesey Road	++	?	+	++	++	+	0	+	0	0	0	+
US517	Park House, Pratts Lane	+	?	+	++	++	0	0	+	++	0	-	+
US45	Car park to the south of Mayfield Road	+	0	+	++	+	0	0	+	0	-	0	+
US40	Hersham Day Centre and Village Hall, Queens Road	+	?	+	++	++	0	0	+	0	0	0	+
US389	Hersham sports and social club 128 Hersham Road	+	?	+	++	++	+	0	+	++	0	+	+
US380	New Berry Lane car park	+	?	+	++	++	0	0	+	0	0	0	+
US375	Volkswagen Ltd Esher Road	+	?	+	++	++	--	0	+	++	0	-	+
US390	The Royal George 130-132 Hersham Road	+	?	+	++	++	+	0	+	0	0	+	+
US376	Trinity Hall and 63-67 Molesey Road	+	?	++	0	++	0	0	+	++	0	-	-
US435	Car Park next to Waterloo	+	0	+	++	+	0	0	+	++	0	0	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	Court												
US378	All Saints Catholic Church hall Queens Road	+	?	+	++	++	0	0	+	0	0	0	+
US43	Hersham Technology Park (Air Products)	0	0	++	++	++	++	0	+	++	0	-	+
US374	Hersham Library, Molesey Road	+	?	+	0	++	0	0	+	0	0	0	+

Molesey

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
US509	2 Beauchamp Road, East Molesey	+	0	+	++	+	0	0	+	0	0	+	+
US507	133-135 Walton Road, East Molesey	+	?	+	++	+	0	-	+	0	--	+	+
US529	Garage block west of 14 and north of 15 Brende Gardens, West Molesey	+	0	0	++	+	0	0	+	0	0	+	+
US299	East Molesey Car Park, Walton Road, East Molesey	+	?	+	++	+	0	-	+	0	--	+	+
US151	Garages to the rear of Belvedere Gardens, West Molesey	+	0	0	++	++	0	0	+	0	0	+	+
US152	Garages to the rear of Island Farm Road, West Molesey	+	0	0	++	++	0	0	+	++	0	0	?
US498	7 Seymour Close and Land to rear of 103-113 Seymour Close, East Molesey	+	?	+	0	++	0	0	+	0	0	+	+
US153	11-27 Down Street, West Molesey	+	0	0	++	++	0	0	+	0	0	+	+
US318	Vine Medical Centre 69	+	?	+	++	+	0	-	+	0	0	+	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	Pemberton Road East Molesey												
US456	Molesey Hospital, High Street	+	0	0	++	++	0	0	+	++	0	+	+
US312	Henrietta Parker Centre, Ray Road, West Molesey	+	0	0	++	++	0	-	+	++	0	+	+
US315	Parking /garages at Grove Court Walton Road East Molesey	+	?	+	++	+	0	0	+	0	--	+	+
US302	43 Palace Road East Molesey	+	?	+	++	+	0	-	+	0	0	+	+
US319	Pavilion Sports Club car park Hurst Lane East Molesey	+	0	+	++	+	0	-	+	0	0	+	+
US317	Tesco Metro car park, Walton Road, East Molesey	+	?	+	++	+	0	-	+	0	--	+	+
US309	Water Works south of Hurst Road, West Molesey	+	0	-	++	+	0	0	+	0	0	+	+
US306	Molesey Clinic and library, Walton Road, West Molesey	+	0	+	++	+	0	0	+	0	--	-	+
US296	5 Matham Road East Molesey	+	?	+	++	+	0	-	+	0	-	+	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
US56	Joseph Palmer Centre, 319a Walton Road	+	-	0	++	+	+	0	+	0	+	-	+

Walton-on-Thames

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
US135	12-16a High Street	+	0	+	++	+	0	0	+	0	+	+	+
US350	Leylands House, Molesey Road	+	0	0	++	+	-	-	+	++	0	+	0
US528	Garages to the rear of 84-92 and 94-96 Rodney Road	+	0	+	++	+	0	0	+	0	0	+	+
US326	9-21a High Street	+	0	+	++	+	0	0	+	0	+	+	+
US464	63-69 High Street	+	0	+	++	+	0	0	+	0	+	+	+
US166	Garages to the rear of 17-27 Field Common Lane	+	0	0	++	+	0	0	+	0	0	0	0
US339	Walton Park Car Park	+	0	+	++	++	0	0	+	0	0	+	+
US487	16-18 Sandy Lane	+	0	+	++	+	0	0	+	++	0	+	+
US361	Garages adjacent to 1 Tumbling Bay	+	0	0	++	+	0	0	+	++	0	+	+
US168	Garages at Sunnyside	+	0	-	++	0	0	0	+	++	0	+	+
US532	The Playhouse,	+	0	++	++	+	0	0	+	++	+	+	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	Hurst Grove												
US471	147 Sidney Road	+	0	+	++	+	0	0	+	0	0	+	+
US59	Halfway Car Park, Hershams Road	+	0	+	++	+	0	0	+	0	0	0	+
US112	20 Sandy Lane	+	0	+	++	+	0	-/0	+	++	0	+	+
US323	Bradshaw House Bishops Hill and Walton Centre for the Community, Manor Road	+	0	+	++	++	0	0	+	++	0	+	+
US84	Elm Grove, 1 Hershams Road	+	?	++	++	+	0	-	+	0	-	0	+
US357	Rylton House, Hershams Road	+	?	++	++	+	0	0	+	0	-	+	+
US348	Cornerstone Church, 38 Station Avenue	+	0	+	++	++	0	0	+	++	-	0	+
US360	Walton Comrades Club 7 Franklyn Road	+	0	0	++	+	0	0	+	0	0	+	+
US354	P G S Court, Halfway Green	+	0	+	++	+	0	0	+	++	0	0	+
US352	Fire/Ambulance station Hershams Road	+	0	+	++	+	0	0	+	0	0	+	+
US331	Land to the rear of 60-70 Sandy Lane	+	0	+	++	+	0	0	+	0	0	+	+
US363	Unit Rear of and 12-14 Sandy Lane	+	0	+	++	+	-	0	+	++	0	+	+
US366	Garages off Copenhagen Way	+	0	+	++	++	0	0	+	0	0	0	+
US79	Regnolruf Court, Church Street	+	?	+	++	++	0	0	+	++	-	0	+
US353	Fernleigh Day Centre Fernleigh Close	+	0	+	++	+	0	0	+	0	0	+	+
US325	Garages to the rear of 8 Sidney	+	0	+	++	+	0	0	+	0	0	+	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	Road												
US346	Garages at Collingwood Place	+	0	+	++	++	0	0	+	0	0	0	+
US335	Garages at Home Farm Gardens	+	0	+	++	+	0	0	+	0	0	+	+
US321	Case House 85-89 High Street	+	?	++	++	+	0	0	+	0	--	+	+
US356	Station Avenue Car Park, Station Avenue	+	0	+	++	++	0	0	+	0	-	+	+
US372	1 Cleveland Close	+	0	+	++	+	-	0	+	0	0	+	+
US324	Manor Road Car Park, Manor Road	+	?	+	++	++	0	0	+	0	0	0	+
US72	Courtlands & 1-5 Terrace Road	+	0	+	++	++	0	0	+	0	0	0	+
US370	The Heath Centre, Rodney Road	+	0	+	++	+	0	0	+	++	0	+	+
US327	Bridge Motor Works New Zealand Avenue	+	0	++	++	+	--	0	+	++	+	+	+
US351	35 to 38 and land north of Mellor Close	+	0	-	++	+	0	-	+	++	0	?	?

Weybridge

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
US505	75 Oatlands Drive	+	0	0	++	+	0	-	+	0	0	+	+
US117	9 and rear of 11 and 13 Hall Place Drive	+	0	0	++	+	0	0	+	0	0	+	+
US482	Land to the rear of 24-26 Church Street	+	?	+	++	++	0	0	+	0	-	+	+
US496	Quadrant Courtyard	+	?	+	++	++	--	0	+	++	0	+	+
US395	Weybridge Hospital and car park, 22 Church Street	+	?	++	++	++	0	0	+	++	-	+	+
US520	Weybridge Centre for the Community, Churchfield Place	+	?	++	++	++	0	0	+	0	0	0	+
US470	Oak House, 19 Queens Road	+	0	+	++	++	-	0	+	0	0	+	+
US416	Garages to the west of 17 Grenside Road	+	0	+	++	+	0	0	+	0	0	0	+
US469	Heath Lodge, St George's Avenue	+	0	+	++	++	0	0	+	0	0	?	+
US525	8 Sopwith Drive, Brooklands	0	?	0	++	++	+	--	+	++	0	+	+
US527	9 Cricket Way, Weybridge	+	0	0	++	+	0	0	+	0	0	0	+
US94	Locke King House, 2 Balfour Road	+	-	++	++	++	-	0	+	++	--	+	+
US411	York Road Car Park	+	0	+	++	+	0	0	+	0	0	+	+
US403	HFMC House, New Road and 51 Prince's Road	+	0	+	++	+	--	0	+	+	0	+	+
US397	Floors above Waitrose, 62 High Street	+	+	+	++	+	-	0	+	0	--	+	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
US108	Weybridge Library, Church Street	+	?	++	++	++	0	0	+	0	-	+	+
US417	Garages to the rear of Broadwater House Greside Road	+	0	+	++	+	0	-	+	0	0	+	+
US420	59-65 Baker St	+	?	+	++	+	-	0	+	++	0	+	+
US431	Shell Petrol Filling Station 95 Brooklands Road	+	?	-	++	++	-	-	+	++	0	0	+
US429	Garages at Brockley Combe	+	0	0	++	+	0	-	+	0	0	+	+
US419	35-47 Monument Hill	+	0	+	++	+	0	0	+	++	--	+	+
US404	2-8 Princes Road	+	0	+	++	+	-	0	+	+	+	+	+
US424	Weybridge Bowling Club 19 Springfield Lane	+	0	+	++	+	0	0	+	0	0	+	+
US421	181 Oatlands Drive	+	0	+	++	++	-	0	+	++	0	+	+
US393	The Old Warehouse, 37A Church Street	+	?	++	++	++	-	0	+	0	0	+	+
US110	The Heights	0	?	-	++	++	+	--	+	++	0	?	+
US410	Oatlands car park, Oatlands Drive	+	0	0	++	+	0	0	+	0	0	+	+
US406	179 Queens Road	+	0	0	++	+	0	0	+	0	0	+	+
US402	1 Princes Road	+	0	+	++	+	-	0	+	++	0	+	+
US394	NHS North West, 58 Church Street	+	?	++	++	++	-	0	+	++	--	+	+
US107	Weybridge Delivery Office, Elmgrove Road	+	0	+	++	+	-	0	+	0	--	+	+
US125	Baker Street car park	+	0	+	++	+	0	0	+	++	0	+	+
US92	GlaxoSmithKline, St. Georges Avenue	+	0	+	++	++	--	0	+	++	0	?	+
US391	Woodlawn,	+	0	+	++	++	0	0	+	0	0	+	+

Ref	Site name	1. Homes	3. Heritage	4. Accessibility	5. PDL	6. Economic Growth	7. Employment	11. Flooding	12. Water	13. Land	14. Pollution	15. Landscape	16. Biodiversity
	Hanger Hill and 2 Churchfields Avenue												
US93	Horizon Business Village, Brooklands Road	0	?	-	++	++	+	--	+	++	0	?	+
US398	1-8 Dovecote Close	+	?	+	++	+	0	0	+	0	0	+	+
US407	Foxholes	+	0	0	++	+	0	0	+	++	0	+	+

Appendix 5: Scoring system for sites

SA Objectives	++	+	0	-	--
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	Deliverable (1-5 Years) or Strategic Site (100+ units).	Contributing to meeting the housing requirement.	No housing is being proposed.	More than 1 dwelling is being lost by the proposed development.	More than 50 dwellings would be lost by the development proposal.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings.	N/A	Development likely to have a positive impact on historic character.	No impact on archaeological, historic and cultural assets.	Impact on setting of archaeological, historic and cultural assets / partial loss of assets.	Complete loss of archaeological, historic and cultural assets.
4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities. Criteria taken from accessibility standards in the Green Belt Boundary Review –	Excellent 0 - 400m distance to bus stop with good / very good / excellent service; railway station; major service and employment centre or locally significant employment area; primary school; secondary school; health centre / GP; dentist; nearest retail centre; local	Good 400m to 800m distance to bus stop with good / very good / excellent service; railway station; major service and employment centre or locally significant employment area; primary school; secondary school; health centre / GP; dentist; nearest retail	Fair 800 - 1.2km distance to bus stop with good / very good / excellent service; railway station; major service and employment centre or locally significant employment area; primary school; secondary school; health centre / GP; dentist; nearest retail centre; local	Moderate 1.2 - 1.6km distance to bus stop with good / very good / excellent service; railway station; major service and employment centre or locally significant employment area; primary school; secondary school; health centre / GP; dentist; nearest retail	Limited Over 1.6km distance to bus stop with good / very good / excellent service; railway station; major service and employment centre or locally significant employment area; primary school; secondary school; health centre / GP; dentist; nearest retail centre; local services; and publicly accessible green spaces.

Accessibility Assessment June 2019	services; and publicly accessible green spaces.	centre; local services; and publicly accessible green spaces.	services; and publicly accessible green spaces.	centre; local services; and publicly accessible green spaces.	
5. To make the best use of previously developed land and existing buildings	PDL on the site will be used.	N/A	Mix use of PDL and greenfield.	N/A	Greenfield.
6. To support economic growth which is inclusive, innovative and sustainable. Criteria taken from accessibility standards in the Green Belt Boundary Review – Accessibility Assessment June 2019	Excellent 0-5km distance to major service centre / employment location or 0-2.5km distance to significant employment site.	Good 5.1-10km distance to major service centre / employment location or 2.6-5km distance to significant employment site. The site is of a scale (over 0.25ha) to enable the development of new employment units as part of the development.	Fair 10.1-15km distance to major service centre / employment location or 5.1-7.5km distance to significant employment site.	Moderate 15.1-20km distance to major service centre / employment location or 7.6-10km distance to significant employment site. The site is not of a scale (under 0.25ha) to enable the development of a new neighbourhood which would improve access to and provision of additional services and facilities as well as employment opportunities.	Limited 20+km distance to major service centre / employment location or 10+km distance to significant employment site.

7. To provide for employment opportunities to meet the needs of the local economy.	Creates a large new workforce / Strategic Sites (100+ jobs).	Creates new workforce in a single employment or retail use or business / midrange sites.	Only creates temporary construction jobs (not a new workforce) / smaller sites and modest additions.	Partial loss of jobs (existing employment use).	Loss of all jobs / partial loss of jobs in a strategic employment area.
11. To reduce flood risk			Flood Zone 1 Low surface water flooding issues (1 in 1000 yr) on site and / or any risk affecting access. Medium surface water flooding issues (1 in 100 yr).	Mostly or all Flood Zone 2 / Flood Zone 3a and / or risk of 1 in 30-year surface water flooding on less than 20% site area.	In functional flood plain (FZ3b) or risk of 1 in 30-year surface water flood risk on more than 20% site area.

<p>12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.</p>	<p>N/A</p>	<p>Site does not lie within a Groundwater Protection Zone. No waterbody on site. Existing infrastructure serves site and surrounding area.</p>	<p>N/A</p>	<p>Site lies in Groundwater Protection Zone. Water courses dissect site or water body on site. Water utility infrastructure not easily assessable.</p>	<p>N/A</p>
<p>13. To reduce land contamination and safeguard soil quality and quantity</p>	<p>Potentially contaminated land on site. Site contains non-agricultural & urban quality soils.</p>	<p>The site contains Grade 4 quality soil.</p>	<p>No potentially contaminated land on site.</p>	<p>Loss of Grade 3 quality soil.</p>	<p>Loss of Grades 1 & 2 quality soils.</p>

<p>14. To ensure air quality continues to improve and noise and light pollution are reduced.</p>	<p>N/A</p>	<p>Site location does not fall within a proposed or existing Air Quality Management Area or is not in proximity of a major highway network (M25 / A3).</p> <p>The site is in or adjacent to the built-up urban area - unlikely to be a noticeable intrusion from light or noise pollution.</p>	<p>The site is PDL or adjacent to the built-up urban land.</p>	<p>Site location is not within but adjoins a proposed or existing Air Quality Management Area or is in proximity of a major highway network (M25 / A3).</p> <p>The site is not located in or adjacent to the built-up urban area and therefore will increase perception of noise, light and air pollution.</p>	<p>Site location falls within a proposed or existing Air Quality Management Area and would require mitigation through design to resist existing pollution threats.</p>
<p>15. To protect and enhance landscape character. Assessment refers to the Elmbridge Borough Landscape Sensitivity Study 2019</p>	<p>N/A</p>	<p>Site located in the urban built-up area with no local green space designation nearby.</p>	<p>Assessment shows low or moderate-low landscape character impact.</p> <p>Site is not covered or near a landmark or strategic view or local green space.</p>	<p>Assessment shows moderate landscape character impact.</p> <p>Site will impact on landmark, strategic view or local green space designation.</p>	<p>Assessment shows high or moderate-high landscape character impact.</p>
<p>16. To conserve and enhance biodiversity.</p>	<p>N/A</p>	<p>Site is in the built-up urban area or on PDL and not covered by any biodiversity designation.</p>	<p>N/A</p>	<p>Site is a partially greenfield land or partially covered by a biodiversity designation.</p>	<p>Site is in its entirety a greenfield or covered by a biodiversity designation.</p>

