



Sustainability Appraisal Addendum of Proposed Main Modifications



Elmbridge Local Plan



August 2023



Elmbridge

Borough Council

... bridging the communities ...

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1. Background and Purpose

- 1.1 The Elmburgh Local Plan sets out how the communities and places of Elmburgh will develop over the next 15 years. It includes policies and site allocations to guide the development and use of land, as well as defining those areas that will be protected and enhanced for heritage or nature conservation purposes. It will form the basis on which planning applications in the borough will be determined.
- 1.2 The council issued its Regulation 19 version of the Local Plan for representations on 17 June until 29 July 2022. Following receipt and consideration of the representations received, the council has identified a number of proposed changes to be included as part of the submission version of the draft Local Plan.
- 1.3 Most of the changes to the draft Local Plan are minor as they either make corrections to text or add clarity to the supporting commentary. These minor modifications do not require screening. Any changes made to the policies that seek to address issues of soundness raised in the representations, are considered main modifications, and require screening.
- 1.4 A Sustainability Appraisal (SA) appraises the environmental, social, economic performance of the draft Local Plan and any reasonable alternatives. The [SA Scoping Report](#), SA reports for each of the Regulation 18 stages¹ and the [Regulation 19 stage](#) were completed and published for consultation concurrent with each stage of the draft Local Plan. Appendix 3 provides the SA objectives that have been used throughout the process.
- 1.5 This document is an addendum to the 2022 SA report which was completed for the Regulation 19 Local Plan. It has been prepared to update the appraisal where necessary, taking into account the proposed Main Modifications. This ensures that all the likely significant effects of the Main Modifications of the Local Plan have been identified, described, and evaluated.
- 1.6 This addendum to the 2022 SA report:
- screens proposed changes to the draft Local Plan and confirms whether they are significant for the SA,
 - updates the SA as necessary, including any amendments to specific policy appraisals to reflect the consultation response, and
 - sets out the next steps for the Local Plan and SA.

¹ Please see the [consultations webpage](#) for all previous regulation 18 consultations.

2. Screening proposed changes

- 2.1 This section sets out the approach to determining the significance of the proposed changes (Main Modifications and Minor Modifications) to the Local Plan. National Planning Practice Guidance (PPG) (Strategic Environmental Assessment and Sustainability Appraisal, Paragraph: 021 Reference ID: 11-021-20140306, Revision date: 06 03 2014) states that:

“The sustainability appraisal report will not necessarily have to be amended if the plan is modified following responses to consultations. Modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/ or is likely to give rise to significant effects.

Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects. A further round of consultation on the sustainability appraisal may also be required in such circumstances but this should only be undertaken where necessary. Changes to the plan that are not significant will not require further sustainability appraisal work”.

- 2.2 In terms of the minor modifications, these include typos and grammatical corrections, as well as additions to the supporting text clarifying how policies will be implemented. These are not considered significant in terms of the conclusions of the SA and are not included in the screening exercise.
- 2.3 The proposed main modifications to the Local Plan were reviewed to determine whether they are significant and whether there was a need for any consequential changes to the previous sustainable appraisal work. This work is presented in the screening exercise table in Appendix 1. The final column of the table indicates, for each main modification, whether it was considered significant for the purposes of the SA and why.
- 2.4 Many of the amendments highlighted in Appendix 1 are those that make the wording and/or intent of policies clearer. Such changes are reviewed to confirm whether they affect the 2022 SA results. This is the most common of change identified in the review. There are also several changes that are made to ensure consistency with the National Planning Policy Framework and PPG.
- 2.5 Where changes involve the deletion of text from a policy in the Main Modifications, the impact of this deletion or revised wording is considered to see if it has any implications for the SA in terms of conclusions for the SA or the commentary accompanying relevant parts of the appraisal.

- 2.6 Where a change to a policy introduces an additional criterion, a judgement is made as to whether the change would affect the previous appraisal and/ or should be acknowledged in the appraisal. In such instances, significance is determined on a case-by- case basis and a comment made in the table in Appendix 1 on whether the previous appraisal has been amended and which SA objectives (at appendix 3) are affected.

Results of the Screening Exercise

- 2.7 The full results of the screening exercise are set out in the table in Appendix 1. None of the changes highlighted are considered to change the direction or strategy of the plan and therefore are not considered significant enough to amend the 2022 SA report.
- 2.8 From the main modifications identified and after the screening exercise, 8 policies require SA assessments. These policies are:
- CC2- Minimising waste and promoting a circular economy
 - CC3- Sustainable design standards
 - CC5- Managing flood risk
 - ENV2- Landscape, trees and woodlands
 - ENV5- Thames Basin Heaths Special Protection Area
 - ENV6- Protecting, enhancing and recovering biodiversity
 - ENV7- Environment Quality
 - INF6- Rivers
- 2.9 The full policy changes, reasoning table and SA are included in Appendix 2 with changes in red and deletions in strikethrough for clarity.

3. Appraisal Results

- 3.1 This section sets out the findings of the assessments for the 8 proposed main modifications policy changes. The policies have been assessed against the 16 sustainability objectives (at Appendix 3) where relevant,
- 3.2 As a reminder, table 1 presents 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 rationale for the score.

Table 1: SA Scoring System

	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	?

Table 2: Appraisal results of main modifications

	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
CC2		+						+	++	+		+	+			
CC3		+						+	+	++		++				
CC5		+				0	0		+	+	+			+	+	+
ENV2		+	+							+	+				++	++
ENV5																++
ENV6	0	++				0	0	++		++		++				++
ENV7		+							+	+		++	+	+		+
INF6	+	+	+	+		+	+			+	+				++	++

*Previously Developed Land

- 3.3 Table 2 summarises the results of assessments for the proposed main modifications. Grey shaded boxes in the table means that the policy is not relevant to the SA objective. The appraisals are 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.
- 3.4 Many of the SA objectives now have a minor positive instead of a neutral score and some have changed to a major positive due to additional requirements which strengthen the policy. This is an improvement on the previous minor positives and confirms that these do not impact on the direction of the Local Plan for submission.
- 3.5 The proposed main modifications for CC2 and CC3 result in a reduction from a major positive to a minor positive for two SA objectives. This concerns SA objective 9 (Natural resources) for CC2 and 10 (Climate change) for CC3 that states it was a major in the text but had originally scored a minor on the table.
- 3.6 Most apparent from the SA results of proposed main modifications are the major positive scores for biodiversity. Taking into account the previous 2 major scores, this results in 5 major scores across the SA objectives and Local Plan policies.

- 3.7 In terms of overall impacts of the plan, (Table 16- 2022 [SA report](#)), the main modifications do not change the total impacts for SA objective 1 to 15. These conclusions are still the same as the 2022 SA report. However, the main modifications have resulted in more major positives for biodiversity for policies ENV5, ENV6 and INF6. This results in a major positive for biodiversity for the whole plan.

Table 3: Total Plan impacts

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. Main modifications to ENV5, ENV6 and INF6 have resulted in previous minor positives becoming major, which then changes the total plan impact to a major positive for biodiversity taking into account these changes and previous major positive scores.
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Secondary or indirect, Cumulative, Synergistic and permanent effects

- 3.8 Ensuring greater biodiversity net gain on site, providing SANG to protect the Thames Basin Heath Special Protection Area and encouraging opportunities to create and/or enhance water dependent habitats to improve rivers all will have cumulative effects across the duration of the plan. The greater biodiversity provided will allow green and blue infrastructure networks to increase which has several environmental and health benefits.
- 3.9 The indirect effects of the provision of dwellings in the urban area with greater biodiversity net gain will protect agricultural land, water quality, landscape setting, biodiversity and heritage assets that are located outside the urban area.
- 3.10 Synergistic effects are expected in the long term as a more planned and cohesive green and blue infrastructure networks will be provided as development increases. This could also result in a permanent effect as greater green and blue infrastructure provision is an integral component of future development schemes.

4. Conclusions and next steps

- 4.1 This SA Addendum has considered proposed changes to the Local Plan following the Regulation 19 representation period.
- 4.2 The proposed changes will be submitted alongside the submission version Local Plan to the Planning Inspectorate who will appoint a Planning Inspector to carry out an Examination in Public (EiP) to assess whether the Local Plan has been prepared in accordance with legal and procedural requirements, and whether it is sound. The 2022 SA Report and this Addendum will also be submitted as part of the evidence base for the Local Plan.
- 4.3 As part of the examination the Inspector(s) may identify additional main modifications that they consider necessary to make the plan sound. These will be screened as part of the SA process and the SA updated as appropriate. If necessary, the main modifications and a revised SA will be consulted on.

Appendix 1: Screening of proposed main modifications

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
M1.1	Vision	13	Add additional bullet under para. 2.1: <ul style="list-style-type: none"> Supporting our local businesses, enterprise and promoting business adaption. 	To improve clarity and accuracy and ensure soundness and compliance with the NPPF section 6.	None- this is additional text that strengthens the vision regarding growing a prosperous economy.
M2.1	SS2	22	Addition to criterion 2(a)(ii) of Policy SS2: ii) conserving and enhancing biodiversity, including through biodiversity net gain and creation of high-quality terrestrial and water dependent habitats.	To improve clarity of policy intent.	None- this is additional text that adds greater detail to the sub section ii) of the policy. This does not affect SA of the policy.
M2.2	SS2	23	Add additional criterion to Policy SS2 (2)(d): 2(d)(v) Providing access to wide ranging opportunities for sport and physical activity to support the health and well-being of communities.	To ensure soundness and compliance with NPPF para. 93 and 98.	None- this is additional text that adds a new criterion to the policy. This contributes to the minor positives already scored for the health and well-being and accessibility SA objective.
M2.3	SS3	28	Amendment to existing criterion 1(a) of Policy SS3: (a) At least 6,680 6,785 net additional homes, with at least 30% to be affordable.	To reflect removal of three sites from the site allocations as per M6.1 below.	None- although the removal of 3 sites (104 units) does change the policy text, this reduction in housing units does not impact the SA results for example, the Housing objective already scores a major negative. The reduction in units does not impact the other economic or environmental SA objectives.
M3.1	CC1	32	Amendment to criterion 1 of Policy CC1: 1. To help tackle mitigate the effects of climate change, developments will be expected to optimise building design and achieve the	To improve clarity and accuracy.	None- this amendment does not affect the SA of the policy.

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
			highest possible levels of energy efficiency, taking a 'fabric first approach' to mitigate the effect of climate change.		
M3.2	CC1	32	Amendment to criterion 2 of Policy CC1: 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. As a minimum development must reduce carbon dioxide emissions by the TER set out in Building Regulations. This reduction should be achieved through energy efficiency measures taking a fabric first approach and the provision of on-site renewables and low-carbon technologies, following the principles of the energy hierarchy. Development that seeks to significantly improve upon the TER will be supported where they meet the requirements of other policies in this Plan.	To improve clarity and accuracy and ensure policy reflects latest position with regards to Building Regulations Target Emissions Rate.	None- this amendment does not affect the SA of the policy.
M3.3	CC1	32	Amendment to criterion 4 of Policy CC1: 4. The development of C carbon neutral/zero carbon developments will be strongly encouraged and supported where they meet the requirements of other policies in this Plan.	To improve clarity.	None- this amendment does not affect the SA of the policy.
M3.4	CC2	34	Amendment to criterion 1 of Policy CC2: 1. All major 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.	To improve clarity with regards to how the Council will implement the policy.	This amendment could result in a change to the SA as this reduces all development to only major development.
M3.5	CC2	34	Add additional criterion to Policy CC2(2): 2. Developments will be expected to:	To improve clarity and accuracy.	None- this additional criterion does not affect the SA of the policy as the

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
			a) Seek to limit demolition and prioritise retention and refurbishment of existing buildings as far as reasonably practicable.		natural resources SA objective scores a major positive.
M3.6	CC2	34	Add additional criterion Policy CC2: 3. Applications for major development should include a statement, such as a sustainability statement or equivalent, setting out how the matters in this policy have been addressed. Smaller developments are encouraged to include information proportionate to the size of the development in the planning application.	To improve clarity with regards to how the Council will implement the policy.	Although this change provides greater detail in terms of the requirements for a sustainability statement for both major and smaller developments, this does not push any of the previous minor positives to major positives. The use of natural resources SA objective already scores a major positive and therefore this additional criterion does not affect the SA of the policy.
M3.7	CC3	36	Amendment to criterion 1(d) of Policy CC3: d) All residential development of 10 or more dwellings should must achieve a Home Quality Mark 4 star as a minimum and aim towards achieving a higher mark where possible, or any equivalent new or equivalent standard.	To improve clarity with regards to how the Council will implement the policy.	The change of word from 'must' to 'should' could impact on the SA of the policy.
M3.8	CC3	36	Amendment to criterion 1(f) of Policy CC3: f) All major 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.	To improve clarity with regards to how the Council will implement the policy.	The change from 'all development' to 'all major development' could impact on the SA of the policy.
M3.9	CC3	36	Add additional criterion to Policy CC3: 2. Applications for major development should include a statement, such as a sustainability statement or equivalent, setting out how the matters in this policy have been addressed.	To improve clarity with regards to how the Council will implement the policy.	Alongside M3.7 and 8 this could affect the SA of the policy.

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
			<p>Smaller developments are encouraged include information proportionate to the size of the development in the planning application.</p>		
M3.10	CC5	39 - 41	<p>Amendments and additions to Policy CC5:</p> <p>To reduce the overall and local risk of all forms of flooding and manage water resources:</p> <p>1. Development must be located, designed and laid out to ensure that it is safe; the risk from flooding from all sources 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:</p> <p>a) Through a sequential test it is located in the lowest area of flood risk from all sources appropriate flood risk zone in accordance with national policy and the Elmbridge Strategic Flood Risk Assessment (SFRA);</p> <p>b) It would not constrain the natural function of the flood plain or surface water flow route, either by impeding flood flow or reducing storage capacity; and</p> <p>c) Where sequential and exception tests have been undertaken, any development that takes place where there is a risk of flooding from all sources will need to ensure that flood</p>	<p>To improve accuracy and ensure policy is effective and ensure soundness and compliance with NPPF para. 159 – 169.</p>	<p>The change could have an impact on the SA, and will be reassessed to test the implications due to the additional requirements which may have an impact on the previous neutral scores.</p>

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
			<p>mitigation measures are integrated into the design to minimise the risk to property and life should flooding occur.</p> <p>Add additional criterion between existing criterion 3 and 4:</p> <p>4. Development proposals in the 'developed' Flood Zone 3b – Functional Floodplain will only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) and there will be no increase in development vulnerability or intensification in use.</p> <p>Replace existing criterion 4 and 5:</p> <p>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.</p> <p>5. All new development is required to ensure that sustainable drainage systems are used for the management of surface water.</p> <p>5. All development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off. Sustainable drainage systems are required on all developments, unless proved to be not reasonably practicable, and should:</p>		

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
			<p>a) Ensure surface run-off is managed as close to the source as possible and does not increase flood risk elsewhere;</p> <p>b) Be in accordance with the rainwater disposal hierarchy of Buildings Regs Part H3 (3);</p> <p>c) In circumstances where it has been proved that infiltration is impractical, discharge of surface water to watercourse/sewer shall not exceed the following peak rates:</p> <ul style="list-style-type: none"> • at pre-development greenfield runoff rates on all new development; • as close as reasonably practicable to greenfield run off rates from all other brownfield sites. <p>d) Be designed to be multi-functional and incorporate sustainable drainage into landscaping and public realm, including maximising opportunities to establish surface water ponding areas, urban watercourse buffer areas and multi-use flood storage areas in locations of high surface water flood risk and critical drainage areas to improve flood resilience, amenity and biodiversity.</p> <p>e) Achieve improvements in water quality through a sustainable drainage system management train;</p>		

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
			<p>f) Be designed with consideration of future maintenance and climate change; and</p> <p>g) Make improvements in accordance with the Council's most up to date Infrastructure Delivery Plan.</p> <p>Additional criterion added after existing criterion 5: 6. Any basement development connected to the sewerage network shall be fitted with a positive pumped device to protect the basement from sewer flooding.</p>		
M4.1	ENV2	45	<p>Amendment and addition to Policy ENV2: 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.</p> <p>3. Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland, ancient or veteran trees) will be refused, unless there are wholly exceptional reasons.</p>	To improve accuracy and ensure soundness and compliance with NPPF para. 180.	The change could have an impact on the SA, and will be reassessed to test the implications on the landscape, biodiversity and heritage SA objectives.
M4.2	ENV3	46	<p>Additional Local Green Spaces to be designated: Stoke D'Abernon Memorial Park Walton Lane Open Space Kingston Grammar School Playing Fields/ Ditton Field, Thames Ditton</p>	To improve accuracy and ensure soundness and compliance with NPPF para. 101 and 102.	No- these additional sites do not affect the SA of the policy.

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
			<i>These additional Local Green Spaces will also be added Appendix 4 and the map at figure 8.</i>		
M4.3	ENV4	48	Amendment to criterion 1 of Policy ENV4: 1. Land which is designated as Green Belt on the Policies Map will be protected against inappropriate development in accordance with national policy.	To improve accuracy and ensure soundness and compliance with NPPF para. Section 13.	No- this amendment does not affect the SA of the policy.
M4.4	ENV5	50	Additional criteria added after existing criterion 4 of ENV5: 5. The following principles apply to the provision of SANG: a) A minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants. b) Developments must fall within the catchment of the SANG that provides avoidance, except developments of fewer than 10 net new residential units. c) The Council will collect developer contributions towards avoidance and mitigation measures, including SANG (unless bespoke SANG is provided) and SAMM. d) Developments may secure or provide bespoke SANG. Proposals for new SANGs are unlikely to be acceptable unless agreed by	To ensure soundness and compliance with para. 181 of the NPPF and the Council's legal obligation to protect the Thames Basin Heath Special Protection Area.	The change could have an impact on the SA, and will be reassessed to test the implications on the biodiversity SA objectives.

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
			<p>Natural England. Large developments may be required to provide bespoke SANG.</p> <p>e) The Council will cooperate with Natural England and other landowners and stakeholders in monitoring the effectiveness of avoidance and mitigation measures and monitoring visitor pressure on the SPA and review/ amend the approach set out in this policy as necessary.</p> <p>6. The Council will work with Natural England and landowners to bring forward adequate SANG capacity, and where necessary will consider using all options available.</p> <p>7. Where further evidence demonstrates that the integrity of the SPA can be protected using different distance thresholds or with alternative measures (including standards of SANG provision different to those set out in this policy), the Council will agree these in consultation with Natural England.</p>		
M4.4	ENV6	52	<p>Amendments to Policy ENV6:</p> <p>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, including through local nature recovery networks, to contribute towards a national network of wildlife-rich habitats and wider ecological networks to restore nature.</p>	<p>To improve clarity and accuracy, ensure soundness and compliance with NPPF para. 179 – 182 and ensure compliance with the provisions of the Environment Act, 2021.</p>	<p>The change could have an impact on the SA, and will be reassessed to test the implications on the biodiversity SA objectives.</p>

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
			<p>3. Development proposals must seek to protect, enhance and conserve wildlife habitats and species, including Habitats of Principal Importance and Species of Principal Importance, by creating new natural areas or restoring and enhancing existing habitats.</p> <p>4. Development proposals must:</p> <p>a) Lead to a net gain in biodiversity of a minimum of 2010% (or the latest standard in national guidance, whichever is greater) on all sites, unless an exemption applies, in accordance with the provisions of the Environment Act. 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;</p> <p>b) Protect, conserve and enhance existing biodiversity features, including Habitats of Principal Importance, and secure their long-term management and maintenance.</p> <p>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.</p>		

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
M4.5	ENV6	53	Amendment to table at page 53 below para. 5.24: <i>Field Common/Hersham Pits SNCI to be removed from table as a locally important site.</i>	The site is no longer a designated SNCI.	No implications are associated with this amendment to the table.
M4.6	ENV7	55	Amendments to Policy ENV7: Amendment to criterion 1: a) Incorporate site zoning of pollution sources and receptors, or to ensure that existing and future occupiers are not subject to unacceptable levels of odour pollution, noise, vibration or light disturbance, both within buildings and externally, unless the impact can be acceptably mitigated. (b) Avoid locating noise sensitive uses close to existing sources of pollutants unless the impact can be acceptably mitigated; and	To improve clarity and accuracy and ensure policy is sound and effective.	None- these amendments do not affect the SA of the policy.
M4.7	ENV7	56	Add two additional criteria between existing criterion 4 and 5: 5. The WFD status of all waterbodies in the Borough will be protected. Development that impacts the WFD status of the Borough's waterbodies will be required to undertake a WFD assessment. 6. Source Protection Zones (SPZs) should be taken into account when considering the environmental impact of a development and development proposed in Source Protection Zone 1 (SPZ1) must connect to a mains sewer.	To improve accuracy and ensure the policy is sound and effective.	The change could have an impact on the SA, and will be reassessed to test the implications on the biodiversity, flood risk and water quality SA objectives.

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
M4.8	ENV10	61	<p>Amendments to Policy ENV10:</p> <p>2. Development proposals should be designed to sustain and, where possible, enhance the significance of these assets, their curtilage 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.</p> <p>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 affecting the area or setting of Scheduled Monuments and County Sites of Archaeological Importance, or which are located within Areas of High Archaeological Potential, and for any site outside of these which is greater in area than 0.4ha.</p>	To improve accuracy and ensure soundness and compliance with NPPF section 16, as well as legal compliance with regards to the approach to archaeological sites.	None- these amendments do not affect the SA of the policy.

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
M5.1	HOU2	67	Remove criterion 1 of Policy HOU2: 1. Development must make efficient use of land and optimise sites within the urban area of the borough.	To improve clarity and accuracy.	None- this deletion of text does not affect the SA of this policy
M5.2	HOU4	71	Amendments to Policy HOU4: Amendment to existing criterion 4 (b): b) The overall viability of the scheme and based on any site-specific abnormal costs. Amendment to existing criterion 8: 8. In exceptional circumstances, w h ere the council agrees a lower reduced affordable housing provision, following a viability review at the application stage. It reserves the right through a legal agreement to require a review mechanism(s) to reassess the viability of a site at different later stages of the development.	To improve clarity and accuracy and ensure compliance with PPG on viability para. 9.	None- these amendments do not affect the SA of the policy

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
M6.1	ECO1	79	<p>Amendments to existing criterion Policy ECO1:</p> <p>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:</p> <p>a) D 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</p> <p>3. b S 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.</p> <p>4. 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:</p> <p>a) The site is vacant and tThere is no reasonable prospect of itthe site being retained in employment use; or</p>	To improve clarity and accuracy.	None- these amendments do not affect the SA of the policy

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
			<p>b) The site is no longer suitable for its existing use or other employment uses;</p> <p>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</p> <p>d) The development provides opportunities for sustainable co-location with other non-employment uses.</p>		
M6.2	ECO2	81	<p>Amendment to existing criterion 4 of Policy ECO2:</p> <p>4. Residential accommodation development in SELs will only be acceptable supported if it forms part of a larger redevelopment proposal and it would:</p> <p>a) It would Bring investment to floorspace which has been demonstrated to be redundant for employment uses; and</p> <p>b) The proposal would e Comprise a mix of flexible uses;</p> <p>c) Comply with the Agent of Change Principle; and</p> <p>d) Meet the requirements of the other policies in the Plan.</p>	To improve clarity and accuracy.	None- these amendments do not affect the SA of the policy

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
M7.1	INF2	88	<p>Add additional criterion 4 to Policy INF2: 4. Existing sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <p>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</p> <p>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</p> <p>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</p>	To ensure soundness and compliance with NPPF para. 99.	None- this additional criterion does not affect the SA of this policy.
M7.2	INF6	94 - 95	<p>Amendments to Policy INF6:</p> <p>Additional criterion between existing criterion 3 and 4: 4. Opportunities to create and/or enhance water dependent habitats to improve rivers and the movement of terrestrial and aquatic species between habitats will be supported where they meet the requirements of other policies in this Plan.</p> <p>Amendment and addition to existing criterion 7: 7. Development proposals that contain or are adjacent to watercourses should consider the impact that development can have on them</p>	To improve clarity and accuracy as well as ensure the policy is sound and effective.	The change could have an impact on the SA, and will be reassessed to test the implications on the SA objectives.

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
			<p>and provide a minimum of a 10 metre undeveloped buffer from the river bank, measured from the top of the bank. Buffer zones must be free from built development including lighting, domestic gardens and formal landscaping.</p> <p>Additional two criterion added between existing criterion 7 and 8:</p> <p>9. Opportunities for de-culverting of watercourses should be actively pursued. Planning permission will only be granted for proposals which do not involve the culverting of watercourses, and which do not prejudice future opportunities for de-culverting.</p> <p>10. Proposals for hard engineering approaches to riverbank protection, such as sheet piling, will be discouraged. Soft engineering approaches should be used wherever possible.</p>		
M8.1	Site Allocations	102 & 106	<p><i>Remove Site ESH15 (US39) Unit A & B Sandown Industrial Park, Esher, KT10 8BL</i></p> <p><i>Remove Site WOT2 (US350) Leylands House, Molesey Road, Walton-on-Thames</i></p> <p><i>Remove Site H8 (US389) Hersham Sports and Social Club, 128 Hersham Road, Hersham, KT12 5QL</i></p>	Landowners have advised that the sites are no longer available.	None- these site allocations and SA reports will be deleted. The reduction in housing numbers are discussed in M2.3.

Mod. Ref.	Policy Ref.	Page no.	Proposed Modification	Reason	Are there implications for the SA arising from the proposed change?
M8.2	Site Allocations	104	<p>Amendment to allocation at US374 Hersham Library, Molesey Road, Hersham, KT12 4RF:</p> <p>Allocated for 13 residential units and re-provision of community use library</p>	<p>To improve accuracy as Surrey County Council, who own the library, have said in their representations that the Borough's libraries will be retained.</p>	<p>None- this does not affect the SA of this site allocation.</p>

Appendix 2: Updated SA for main modifications

Updated SA for CC2 – Minimising waste and promoting a circular economy

Policy CC2 below includes the proposed Main Modifications. Additional text is shown in red and deleted text is in ~~black strikethrough~~.

CC2 - Minimising waste and promoting a circular economy

1. All **major** 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) Seek to limit demolition and prioritise retention and refurbishment of existing buildings as far as reasonably practicable.**
 - ~~a~~b) 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~~c) 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~~d) 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.
3. **Applications for major development should include a statement, such as a sustainability statement or equivalent, setting out how the matters in this policy have been addressed. Smaller developments are encouraged to include information proportionate to the size of the development in the planning application.**

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. The regulation 19 representations resulted in a change to policy.
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	Draft Policy	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. The policy has been changed from all developments to major developments which results in a minor positive impact. It will still aim to minimise the production of waste, encourage the efficient use of minerals and reduce the use of primary resources. It therefore scores a major minor 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.

SA Objective	Draft Policy	Commentary
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~~ **minor** 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

Updated SA for CC3 – Sustainable design standards

Policy CC3 below includes the proposed Main Modifications. Additional text is shown in red and deleted text is in ~~black strikethrough~~.

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~~ **should** achieve a Home Quality Mark 4 star as a minimum and aim towards achieving a higher mark where possible, or ~~any equivalent~~ new **or equivalent** 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 **major** 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.~~

2. Applications for major development should include a statement, such as a sustainability statement or equivalent, setting out how the matters in this policy have been addressed. Smaller developments are encouraged include information proportionate to the size of the development in the planning application.

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. The regulation 19 representations including Thames Water Utilities, The Environment Agency and planning consultants, resulted in a change to policy.
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	Draft Policy	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 minor 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.

Updated SA for CC5 – Managing Flood Risk

Policy CC5 below includes the proposed Main Modifications. Additional text is shown in red and deleted text is in ~~black strikethrough~~.

CC5 - Managing flood risk

To reduce the overall and local risk of **all forms 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 **from all sources** 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~~ **area of flood risk from all sources** 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 **or surface water route**, 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.~~

4. Development proposals in the 'developed' Flood Zone 3b – Functional Floodplain will only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) and there will be no increase in development vulnerability or intensification in use.

5. All development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off. Sustainable drainage systems are required on all developments, unless proved to be not reasonably practicable, and should:

- a) Ensure surface run-off is managed as close to the source as possible and does not increase flood risk elsewhere;
- b) Be in accordance with the rainwater disposal hierarchy of Buildings Regs Part H3 (3);
- c) In circumstances where it has been proved that infiltration is impractical, discharge of surface water to watercourse/sewer shall not exceed the following peak rates:
 - at pre-development greenfield runoff rates on all new development;
 - as close as reasonably practicable to greenfield run off rates from all other brownfield sites.
- d) Be designed to be multi-functional and incorporate sustainable drainage into landscaping and public realm, including maximising opportunities to establish surface water ponding areas, urban watercourse buffer areas and multi-use flood storage areas in locations of high surface water flood risk and critical drainage areas to improve flood resilience, amenity and biodiversity.
- e) Achieve improvements in water quality through a sustainable drainage system management train;
- f) Be designed with consideration of future maintenance and climate change; and
- g) Make improvements in accordance with the Council's most up to date Infrastructure Delivery Plan.

6. Any basement development connected to the sewerage network shall be fitted with a positive pumped device to protect the basement from sewer flooding.

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 **and representations for the regulation 19 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	Draft Policy	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.
9. To use natural resources prudently	+	The draft policy includes the criterion that all development proposals are required to maximise opportunities to establish surface water ponding areas, urban watercourse buffer areas and multi-use flood storage areas in locations of high surface water flood risk and critical drainage areas to improve flood resilience, amenity and biodiversity. This will also reduce the need for the resource use and hence scores a minor positive.
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.
12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.	+	The draft policy includes requirements that all new development must achieve improvements in water quality through sustainable drainage system management and therefore scores a minor positive result.

SA Objective	Draft Policy	Commentary
14. To ensure air quality continues to improve and noise and light pollution are reduced.	+	The draft policy includes consideration of future maintenance and climate change which will protect the natural environment, improve biodiversity and mitigate climate change, which could result in improved air quality and reduced light and noise pollution and therefore scores a minor positive result.
16. To conserve and enhance biodiversity.	+	The policy includes the requirement that developments are designed to be multifunctional and incorporate sustainable drainage into the landscape and public realm. This will help to improve flood resilience, amenity and biodiversity and therefore scores a minor positive.

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, **pollution, natural resources, biodiversity** and reducing flood risk.

Updated SA for ENV2– Landscape, trees and woodlands

Policy ENV2 below includes the proposed Main Modifications. Additional text is shown in red and deleted text is in ~~black strikethrough~~.

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. Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland, ~~ancient or veteran trees~~) will be refused, unless there are wholly exceptional reasons.
- ~~4~~4. Proposals will be expected to provide for the protection of existing trees and their root systems prior to, during and after the construction period.
45. 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~~6. 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). For the regulation 19 consultation, the Woodland Trust suggested amended wording to match requirement of the NPPF.
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	Draft Policy	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.
3. To conserve and enhance, archaeological, historic and cultural assets and their settings	+	Providing a criterion on ancient woodlands, ancient and veteran trees will ensure the protection of the borough's historic trees, which has a minor positive impact on the conservation of the historic environment.
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, **heritage** and the health and well-being of the community.

Updated SA for ENV5 – Thames Basin Heaths Special Protection Area

Policy ENV5 below includes the proposed Main Modifications. Additional text is shown in red and deleted text is in ~~black strikethrough~~.

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.

5. The following principles apply to the provision of SANG:

a) A minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants.

b) Developments must fall within the catchment of the SANG that provides avoidance, except developments of fewer than 10 net new residential units.

c) The Council will collect developer contributions towards avoidance and mitigation measures, including SANG (unless bespoke SANG is provided) and SAMM.

d) Developments may secure or provide bespoke SANG. Proposals for new SANGs are unlikely to be acceptable unless agreed by Natural England. Large developments may be required to provide bespoke SANG.

e) The Council will cooperate with Natural England and other landowners and stakeholders in monitoring the effectiveness of avoidance and mitigation measures and monitoring visitor pressure on the SPA and review/ amend the approach set out in this policy as necessary.

6. The Council will work with Natural England and landowners to bring forward adequate SANG capacity, and where necessary will consider using all options available.

7. Where further evidence demonstrates that the integrity of the SPA can be protected using different distance thresholds or with alternative measures (including standards of SANG provision different to those set out in this policy), the Council will agree these in consultation with Natural England.

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. The modified policy provides the principles that apply to the provision of SANG.
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. At regulation 19, Natural England commented that the draft Local Plan is unsound as the mitigation is not in place for the protection of the Thames Basin Heath Special Protection Area, however they do appreciate that work is progressing on identifying a site and this could be in place at submission.
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 major positive impact across the duration of the plan.

Overall conclusion

The draft policy scores ~~a major~~ 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~~ as 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.

Updated SA for ENV6 – Protecting, enhancing and recovering biodiversity

Policy ENV6 below includes the proposed Main Modifications. Additional text is shown in red and deleted text is in ~~black strikethrough~~.

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, **including through local nature recovery networks, to contribute**~~ing~~ 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, **including Habitats of Principal Importance and Species of Principal Importance**, 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 **20**~~40~~% **(or the latest standard in national guidance, whichever is greater)** on all sites, unless an exemption applies, **in accordance with the provisions of the Environment Act**. 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, **including Habitats of Principal Importance**, 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 40% 20% 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 The regulation 19 version of the draft Local Plan includesd 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. Initial work has indicated that securing 20% biodiversity net gain on brownfield sites is viable and therefore the previous alternative is now the preferred policy for the submission Local Plan.
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. This was reiterated in the regulation 19 consultation held in 2022.
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	Draft Policy	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	0	Securing 20% BNG on brownfield sites will not negatively impact on viability and therefore the modified policy has a neutral score rather than the previous negative score. The previous regulation 19 policy which was originally an unknown score would score a neutral result too as securing 10% BNG would not impact positively or negatively on this objective.

SA Objective	Draft Policy	Commentary
2. To facilitate the improved health and wellbeing of the whole population.	++	Protecting and enhancing biodiversity can facilitate improved health and well-being for those people living and working in new development schemes. 20% BNG would have a more positive impact than 10% and therefore scores a significant positive effect.
6. To support economic growth which is inclusive, innovative and sustainable.	0	In the short term these are both likely to have a neutral impact on economic growth and could provide a viable biodiversity net gain on site which could support economic growth with its environmental benefits. Therefore, both could score minor positives in the medium and long term.
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 both policies could provide a viable biodiversity net gain on site this could support economic growth with its environmental benefits, they could both score minor positives in the medium and long 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.
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.
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.
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.~~

The modified policy has the most significant positive impacts across four environmental SA objectives and one social SA objective. Evidence has confirmed that viability will not be impacted by the 20% minimum requirement for BNG on brownfield sites and therefore the previous unknown for housing has changed to a neutral score.

Updated SA for ENV7– Environment quality

Policy ENV7 below includes the proposed Main Modifications. Additional text is shown in red and deleted text is in ~~black strikethrough~~.

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~~, or to ensure that existing and future occupiers are not subject to unacceptable levels of odour pollution, noise, vibration or light disturbance, both within buildings and externally, **unless the impact can be acceptably mitigated.**

~~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. The Water Framework Directive (WFD) status of all waterbodies in the Borough will be protected. Development that impacts the WFD status of the Borough's waterbodies will be required to undertake a WFD assessment.

6. Source Protection Zones (SPZs) should be taken into account when considering the environmental impact of a development and development proposed in Source Protection Zone 1 (SPZ1) must connect to a mains sewer.

5.7. 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. At Regulation 19, the Environment Agency stated that the policy should seek to protect and enhance the Water Framework Directive. Thames Water Utilities also requested changes to the policy to ensure the plan is effective and sound.
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	Draft Policy	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.

SA Objective	Draft Policy	Commentary
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. It will positively impact the WFD status of a waterway as it specifically states that WFD status will be protected and a WFD assessment will be required for those developments that impact it. There are also additional requirements for development proposed in source protection zones. The increased policy requirements result in a major positive impact for this SA objective.
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. **SA objective 12 scores a major positive due to the additional requirements to improve water quality.**

Updated SA for INF6– Rivers

Policy INF6 below includes the proposed Main Modifications. Additional text is shown in red and deleted text is in ~~black strikethrough~~.

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 create and/or enhance water dependent habitats to improve rivers and the movement of terrestrial and aquatic species between habitats will be supported where they meet the requirements of other policies in this Plan.
45. 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.
56. 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.
67. 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).
78. Development proposals that contain or are adjacent to watercourses should consider the impact that development can have on them and provide a minimum of a 10 meter undeveloped buffer from the river bank, measured from the top of the bank. Buffer zones must be free from built development including lighting, domestic gardens and formal landscaping.
9. Opportunities for de-culverting of watercourses should be actively pursued. Planning permission will only be granted for proposals which do not involve the culverting of watercourses and which do not prejudice future opportunities for de-culverting.

10. Proposals for hard engineering approaches to riverbank protection, such as sheet piling, will be discouraged. Soft engineering approaches should be used wherever possible.

§11. 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. Both the Environment Agency and Surrey County Council (River Thames Scheme) provided representations to the Regulation 19 consultations. Their comments have helped to make the policy stronger.
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 4, 5, 8, 9, 10, 11 , 12, 13 and 14.

SA Objective	Draft Policy	Commentary
1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	+	The policy states that new moorings will be supported if it complies with criteria set out in the policy. This approach will help to ensure those in need for licensed permanent moorings in the borough is met.

SA Objective	Draft Policy	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.
10. To adapt to the changing climate.	+	The policy's support of the River Thames Scheme and the creation and enhancement of water dependent habitats will help protect communities from the increased extremes of weather will help to adapt to climate change in the future.
11. To reduce flood risk.	+	The policy states that it supports proposals for the wider River Thames Scheme and will work proactively with partners to deliver improvements. Supporting the reduction in flood risk along the River Thames scores a minor positive result.
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. The additional criterion for opportunities to create and/or enhance water dependent habitats to improve rivers and the movement of terrestrial and aquatic species

SA Objective	Draft Policy	Commentary
		between habitats result in this SA objective scores a major 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 and biodiversity as the policy states that landscape character and biodiversity of the riverside will be conserved and enhanced. This policy provides specific detail to help guide development.

Appendix 3: 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.