



Local Plan Update

Sustainability Appraisal incorporating Strategic Environmental Assessment (November 2018)

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Non-Technical Summary

- 1.1 This document is a Sustainability Appraisal of the options set out in the Local Plan Update consultation (November 2018). It takes each question and in turn considers how they perform against a range of environmental, social and economic objectives, which have been defined in the Council's Sustainability Appraisal Scoping Report.
- 1.2 The objective of the Sustainability Appraisal is to highlight what the likely effects of each question will be. This allows questions to be compared to each other, and, where they are proposed to be taken forward into policy, identifies mitigation measures that need to be taken to make sure that adverse effects are lessened or eliminated.
- 1.3 At this stage of the Local Plan Update process, there is a range of very different options for spatial policies. As a result, it is not possible to generalise what the likely implications will be. As the Local Plan Update is progressed through the different stages, i.e. once draft policies are in place, it will be possible to better identify what the overall effects of the plan as a whole are.
- 1.4 As the draft Local Plan is progressed, it will be accompanied by the next stage of the Sustainability Appraisal, which will again be subject to consultation.
- 1.5 We have appraised the options for Questions 1, 6, 9 and 10 in this document and a summary of the likely effects (both positive and negative) are shown in Table 1.

Table 1 - Summary of likely effects for LPU consultation questions 1, 6, 9 and 10

QUESTION 1: Do you agree that the new housing we need should be built in new communities, which would be built with their own schools, roads, community and sports facilities and other associated infrastructure?			
Questions 1:	Approach 1 - Agree – Deliver the majority of development in a small number of large developments that provide for their own infrastructure needs	Approach 2 Neutral – A combination of large and small sties	Approach 3 Disagree – A large number of smaller developments around the Borough
Commentary including positive and negative effects	This approach involves providing development on larger sites that can provide the much-needed infrastructure to deliver sustainable communities that can be incorporated into the developments more readily. This approach would see a reduction in greenfield land and impact negatively upon objectives 10 and 11.	Combining all or some of the options could negatively impact the boroughs characteristic due to this sporadic approach. Existing infrastructure may not be able to cope with the new developments and planning for sustainable developments would be difficult as this is an ad-hoc approach.	This approach would result in a large number of small developments around the Borough that would place an extra strain on the infrastructure that is already in place. This option would have similar negative effects to option 1.
6. Do you agree with being more flexible with building heights, parking standards and development densities, where a range of shops of other services are within walking distance, such as towns and district centres			
Summary of likely effects for Questions 6 – Densities	Approach 1 Agree – Deliver higher densities of housing in town/district centres	Approach 2 Neutral – Deliver a combination of different densities in town/district centres	Approach 3 Disagree – Deliver a lower density of housing in town/district centres

Commentary including positive and negative effects	Higher density development in existing town and district centres, provides opportunities to deliver more sustainable communities through the reuse of brownfield land and access to transport hubs. This may make the most efficient use of brownfield land and support objective 10. This approach may reduce the need for greenfield land, and impact negatively upon objective 3.	Mixed densities in town and district centres could see their character negatively impacted due to loss of greenfield land in these urban areas. However, it does create the opportunity to provide improved the health and well-being in these areas as the population would be within close proximity to key facilities	Low densities in town and district centres would result in extra strain on the infrastructure that is already in place and would not create sustainable communities. This option would impact negatively on objectives 10 and 12
6. Do you agree with being more flexible with building heights, parking standards and development densities, where a range of shops of other services are within walking distance, such as towns and district centres?			
Summary of likely effects for Questions 6 – Building Heights residential	Approach 1 Agree – High flexibility with building heights in the town/district centres	Approach 2 Neutral – Some flexibility in building heights in town/district centres	Approach 3 Disagree – No flexibility in building heights in town/district centres
Commentary including positive and negative effects	Allowing more flexibility in building heights in existing town and district centres, provides opportunities to deliver more sustainable communities through the reuse of brownfield land and access to transport hubs. This approach potentially may see the reduction in greenfield land negatively impacting upon objectives 3 and 11.	Allowing for some flexibility in building heights in the town and district centres creates the opportunity to provide improved the health and well-being in these areas as the population would be in close proximity to all key facilities.	Allowing for no flexibility in building heights in the town district centres would result in a bigger strain on resources and has the potential to impact on the character of the borough. This would increase the likelihood of negative impacts on objectives 10 and 12.
10. Do you agree with being more flexible with building heights on existing employment estates to create more useable space without needing to increase the amount of land?			

Summary of likely effects for Questions 10 – Building Heights Employment	Approach 1 Agree – High flexibility with building heights in the town/district centres	Approach 2 Neutral – Some flexibility in building heights in town/district centres	Approach 3 Disagree – No flexibility in building heights in town/district centres
Commentary including positive and negative effects	Allowing more flexibility in building heights in existing town and district centres, provides opportunities to deliver more sustainable communities through the reuse of brownfield land and access to transport hubs. It also creates the opportunity to provide improved health and well-being in these areas as the population would be within close proximity to all key facilities, and has positive impacts on objectives 8, 10, 20, 21 and 22. This approach also has potentially unknown effects especially against objectives 3 and 11.	Allowing for some flexibility in building heights in the town and district centres creates the opportunity to provide improved health and well-being in these areas as the population would be within close proximity to all key facilities. This would impact positively on objectives 8 and 10 in particular.	Allowing for no flexibility in building heights in town and district centres would result in a bigger strain on resources and has the potential to impact on the character of the borough. It performs negatively against a number of objectives, specifically 20, 21 and 22, which are all economically driven objectives.
Question 9i - Do you agree with meeting employment needs in Town and District Centres?			
Summary of likely effects for Questions 9i	Approach 1 Agree – All employment need should be met in Town and District Centres	Approach 2 Neutral – Some of the employment need should be met in the Town and District Centres	Approach 3 Disagree – None of the employment need should be met in the Town and District Centres

Commentary including positive and negative effects	Focusing all the employment need in existing town and district centres, provides opportunities to deliver more sustainable communities through the reuse of brownfield land and access to transport hubs, thereby supporting objective 11. This would support Objective 22. It also creates the opportunity to provide improved health and well-being in these areas as the population would be in close proximity to all key facilities. This approach has potentially unknown effect especially against objectives 3 and 11.	Focusing some of the employment need in existing town and district centres creates the opportunity to provide improved health and well-being in these areas as the population would be within close proximity to all key facilities, thereby supporting objective 11. Even though it does not perform as well against the objectives as option 1, providing some of the need elsewhere would allow for a more buoyant and competitive economy as different types of employment will be provided.	Focusing none of the employment need in existing town and district centres would result in a bigger strain on resources and has the potential to impact on the character of the borough. It performs negatively against a number of objectives, specifically 20, 21 and 22, which are all economically driven objectives.
Question 9ii : Do you agree with meeting employment needs at existing employment estates and locations?			
Summary of likely effects for Questions 9ii	Approach 1 Agree – All employment need should be met in Existing employment estates and locations	Approach 2 Neutral – Some of the employment need should be met in Existing employment estates and locations	Approach 3 Disagree – None of the employment need should be met in the Existing employment estates and locations

Commentary including positive and negative effects	Focusing all the employment need in existing employment estates and locations, provides opportunities to deliver higher levels of employment as well as a sustainable communities through the reuse of brownfield land and access to transport hubs, thereby supporting objective 10. It also ensures all three of the employment objectives are positively met.	Focusing some of the employment need on existing employment estates and locations provides the opportunity to provide improved health and wellbeing in these areas, as the population would be within close proximity to all key facilities. Even though it does not perform as well against the objectives as option 1, providing some of the need elsewhere would allow for a more buoyant and competitive economy and the opportunity to improve infrastructure elsewhere.	Focusing none of the employment need on existing employment estates and locations would result in a bigger strain on resources and has the potential to impact on the character of the borough. It performs negatively against a number of objectives, specifically 20, 21 and 22, which are all economically driven objectives.
Question 9iii: Do you agree with meeting employment needs on land adjacent to existing employment estates and locations?			
Summary of likely effects for Questions 9iii	Approach 1 Agree – All employment need should be met on Land adjacent to existing employment estates and locations	Approach 2 Neutral – Some of the employment need should be met on Land adjacent to existing employment estates and locations	Approach 3 – Disagree None of the employment need should be met on Land adjacent to existing employment estates and locations
Commentary including positive and negative effects	Focusing all the employment need on land adjacent to existing employment estates and locations provides opportunities to deliver higher levels of employment and a more diverse range of jobs. However, in the short to medium term it is only going to have minor positive effects.	Focusing some of the employment need on Land adjacent to existing employment estates and locations provides the opportunity to expand existing employment locations, it performs positively against objectives 20, 21, 22.	Focusing none of the employment need on land adjacent to existing employment estates and locations creates a lot of uncertainty against all the objectives with the impact being largely unknown.
Question 9iv: Do you agree with meeting employment needs in new Locations?			

Summary of likely effects for Questions 9iv	Approach 1 Agree - All employment need should be met at new locations	Approach 2 Neutral - Some of the employment need should be met at new locations	Approach 3 Disagree - None of the employment need should be met at new locations
Commentary including positive and negative effects	Focusing all the employment need in new locations, provides opportunities to deliver higher quality employment and a more diverse range of jobs. However, in the short to medium term it is only going to have minor positive effects.	Focusing some of the employment need in met at new locations performs similarly to option 1 however not to the same extent	Focusing none of the employment need in new locations creates uncertainty against all the objectives with the impact being largely unknown. It performs negatively against objectives 6 and 7.

1 Introduction

Introduction

- 1.6 This Sustainability Appraisal incorporating Strategic Environmental Assessment (SA incorporating SEA) is the third formal consultation stage about seeking views on sustainability issues.
- 1.7 The first formal consultation stage sought views on a Sustainability Appraisal Scoping Report. The second sought views on the SA incorporating SEA of the Local Plan Issues and Options in 2016

What is this current consultation about?

- 1.8 This consultation is about seeking people's views on producing a Sustainability Appraisal incorporating Strategic Environmental Assessment, which informs and appraises the Local Plan Update (LPU) for Wokingham Borough.
- 1.9 Sustainability Appraisal incorporating Strategic Environmental Assessment (SA incorporating SEA) is the third formal consultation stage about seeking views on sustainability issues.

What is a Sustainability Appraisal / Strategic Environmental Assessment?

- 1.10 The SA / SEA provides an opportunity to consider ways in which the plan can contribute to improvements in economic, social and environmental conditions and the opportunity to mitigate against any adverse effects the Plan might have. It is a systematic process that is carried out during the preparation of a Local Plan.
- 1.11 The Planning Practice Guidance sets out the role of the SEA/SA, and their different purposes, when highlighting that strategic environmental assessment considers only the environmental effects of a plan, whereas sustainability appraisal considers the plan's wider economic and social effects, alongside its potential environmental impacts.¹
- 1.12 At a broad level, the purpose of planning is to help achieve sustainable development. At a very high level sustainable development means "*meeting the needs of the present without compromising the ability of future generations to meet their own needs*"²
- 1.13 The NPPF, in defining sustainable development, is based around three overarching objectives (see Figure 1) or roles of planning as set out in paragraph 8. These are:
 - **an economic objective** – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - **A social objective** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect*

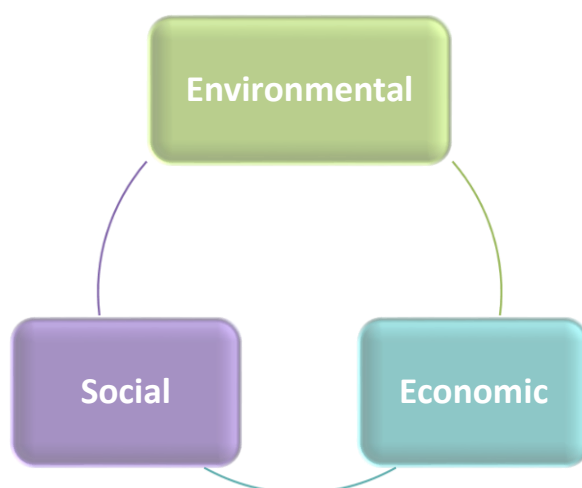
¹ Planning Practice Guidance Paragraph 007. Reference 11-007-20140306

² NPPF (2018) (Paragraph 7), and Resolution 42/187 of the United Nations General Assembly.

current and future needs and support communities' health, social and cultural well-being; and

- **An environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Figure 1 - The three overarching objectives of the NPPF

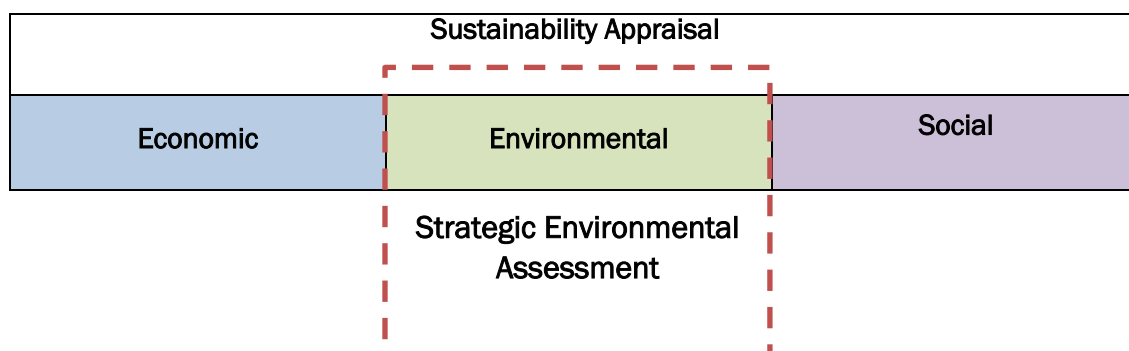


1.14 The SA / SEA will take account of the three objectives in order to ensure that sustainable development is achieved through the Local Plan Update process.

Why is the SEA incorporated into the SA?

1.15 The most sensitive objective is the environmental pillar. The SEA takes account of very significant environmental effects that could result if the Plan is or is not implemented. For example, air pollution does not respect administrative boundaries of local authorities. Figure 2 shows the relationship between the SA, SEA and the three objectives.

Figure 2 - SA/SEA incorporation



How do I get involved?

- 1.16 Consultation on the SA/SEA document runs from 12 November to 4pm on 15 February 2019 **alongside** the Local Plan Update Consultation document.
- 1.17 The statutory SEA Consultation Bodies with environmental responsibilities that are specifically consulted on the SA / SEA are;
- Historic England
 - Environment Agency
 - Natural England
- 1.18 However, other people can respond to the SA / SEA consultation and a list of questions can be found in Appendix 2.
- You can find all of the documents on the Council's website at <http://www.wokingham.gov.uk/local-plan-update/>
- 1.19 Paper copies are also available at the Council's offices at Shute End.
- 1.20 Please send us your comments by email or by post. If you only wish to address certain parts of the consultation, please feel free to respond to only some of the questions.
- Online at: <http://www.wokingham.gov.uk/local-plan-update/>
 - By email to: LPU@wokingham.gov.uk
 - By post to: Growth and Delivery Team, Wokingham Borough Council, Civic Offices, Shute End, Wokingham, RG40 1WR
- 1.21 If you have any questions regarding the consultation, please contact the Growth & Delivery Team by emailing LPU@wokingham.gov.uk.
- 1.22 The following questions may help to inform your response to this consultation on the SA/SEA

Table 2 – Question to Assist Consultation Response

Number	Question
Q1	Do you support the overall approach taken to the appraisal of the questions?
Q2	Have we correctly identified the main significant effects and potential mitigation measures?
Q3	Do you wish to make a comment on the scores given to any specific option(s) for the spatial strategy?
Q4	Does this SA/SEA report of the Consultation document, together with the document, provide sufficient information at this stage to ensure that an appropriate SA can be carried out of the Local Plan?
Q5	Do you have any other comments you wish to make regarding the SA/SEA?

What happens next?

- 1.23 Your comments will be published as part of the Local Plan Update process.³ These comments, along with the comments received in response to the current LPU consultation, the Issues and Options consultation, and further technical studies, will help us to develop the Local Plan Update 'Draft Plan', which is the next stage of the plan-making process. The Draft Plan stage, will set out a proposed strategy for development with proposed allocations and draft policies to manage development in the borough. Views will also be sought on a refined SA / SEA that will accompany the Draft Plan.

Local Plan Update Consultation – 'Homes for the Future'

- 1.24 This is the second public consultation on the plan so far. It is a discussion document to help us move towards strategy options for development. The consultation asks where development should go, whether there are locations suitable that may be suitable for higher densities and taller buildings, alongside views on new employment centres. All land put forward for development can be viewed, and comments are invited on their suitability for future development. .
- 1.25 The LPU consultation, which is running alongside this SA/SEA consultation, is seeking involvement from people in the huge challenge of providing the homes, infrastructure, jobs and other uses we need for the future, in the right way.
- 1.26 You can find all of the documents for the consultation, as well as how to comment on the document, on the Council's website at <http://www.wokingham.gov.uk/local-plan-update/>

Summary and Next stage of the Planning Process

- 1.27 The SA process has helped to inform the preparation of the Local Plan Update, with recommendations put forward through the appraisal process incorporated into the LPU. The SA has identified a number of recommendations and mitigation measures for the spatial strategy options to help mitigate potentially adverse effects and maximise positive effects. Ultimately, success of the policies will depend on their implementation.

Implementation and Monitoring Proposals

- 1.28 To ensure the Local Plan Update is successful in the long term, it is important that the LPU is implemented properly.
- 1.29 The policies that will ultimately be contained within the final (adopted) Local Plan Update will be capable of being monitored.

³ Personal information such as signatures will be redacted and will not be made public.

2 Background and Methodology

Requirement for the Sustainability Appraisal (SA)

- 2.1 The requirement for SEA comes from European legislation (a Directive) and we have to consider. As well as the requirements of the SEA Directive, the [National Planning Policy Framework \(NPPF\)](#) sets out ‘tests of soundness’. Paragraph 35 of the NPPF states that when a local planning authority submit a plan for examination (by a Planning Inspector), they should “*have been prepared in accordance with legal and procedural requirements, and whether they are sound.*” One of the tests of soundness is that the plan is “*Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence*”.⁴
- 2.2 The following legislation is applicable to this Sustainability Appraisal
- [The Planning and Compulsory Purchase Act \(2004\) as amended](#)
 - [The European Directive 2001/EC, known as the Strategic Environmental Assessment \(SEA\) Directive](#); and
 - [The Environmental Assessment of Plans and Programmes Regulations 2004 \(the SEA Regulations\)](#).

Stages of a Sustainability Appraisal

- 2.3 Sustainability Appraisal is a multi-stage process. [The National Guidance on sustainability appraisal](#) provides clarity on the need for sustainability appraisal and strategic environmental assessment in relation to plan development. The guidance sets out the process in a number of stages, as set out in table 3.

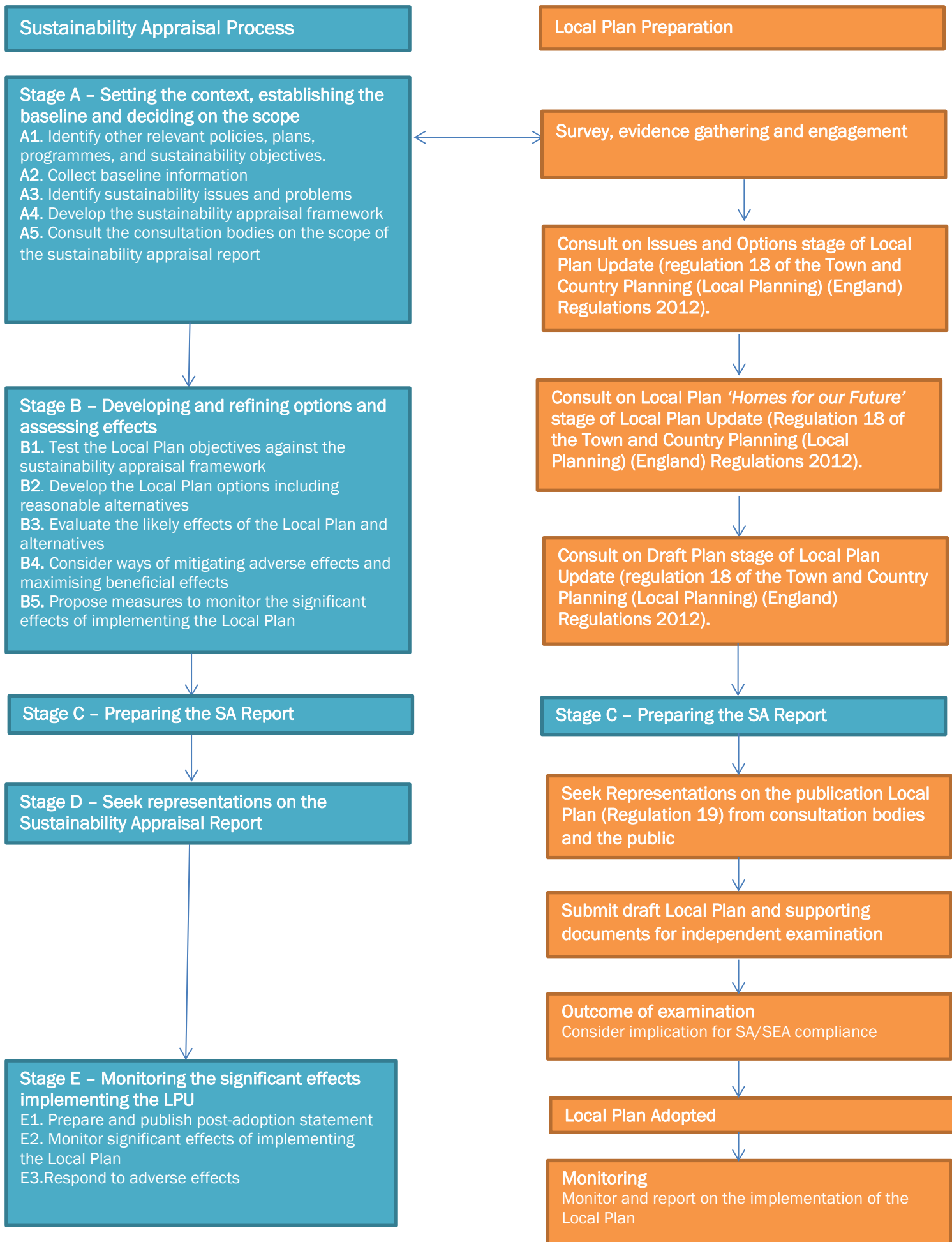
⁴ NPPF (2018), paragraph 35

Table 3 - Stages of the Sustainability Appraisal

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
A1 - Identify other relevant policies, plans, programmes, and sustainability objectives.
A2 – Collect baseline information
A3 - Identify sustainability issues and problems
A4 – Develop the sustainability appraisal framework
A5 – Consult the consultation bodies on the scope of the sustainability appraisal report
Stage B: Developing and refining alternatives and assessing effects
B1 – Test the Local Plan objectives against the sustainability appraisal framework
B2 – Develop the Local Plan options including reasonable alternatives
B3 – Evaluate the likely effects of the Local Plan and alternatives
B4 – Consider ways of mitigating adverse effects and maximising beneficial effects
B5 - Propose measures to monitor the significant effects of implementing the Local Plan
Stage C: Prepare the Sustainability Appraisal Report
Stage D: Seek representations on the Sustainability Appraisal Report
Stage E: Post adoption reporting and monitoring
E1 – Prepare and publish post-adoption statement
E2 – Monitor significant effects of implementing the Local Plan
E3 – Respond to adverse effects

2.4 Figure 3 shows the LPU process alongside the SA process.

Figure 3 - The Local Plan Update process in relation to the SA Process



- 2.5 Tasks A1 to A5 were carried out in 2015/16 in developing the Sustainability Appraisal Scoping Report. They do not therefore need to be repeated in this report, although in carrying out the assessments in Stage B we will need to consider whether there is more up-to-date information on plans or programmes, baseline data or sustainability issues that need to be taken into account for specific assessments. These will be highlighted within the assessments where they are relevant.

What does this report contain?

- 2.6 This Sustainability Appraisal assesses the questions posed in the Local Plan Update consultation November 2018 to February 2019. These questions consider where development should go - concentrated in new communities or spread throughout the borough - whether there are locations suitable for higher densities and taller buildings and our approach to employment centres.
- 2.7 This report covers stage B of the list shown in **Error! Reference source not found.** (excluding B1, as this cannot be completed at this early stage of the LPU process). Stage A is dealt with in the Sustainability Appraisal Scoping Report. Stages C and D relate to the full Sustainability Appraisal Report of the publication (also known as Proposed Submission) plan, which comes at a later stage, whilst Stage E cannot be undertaken before the Local Plan is adopted. It does not represent the final version of those stages, which will be undertaken when a full draft plan is produced, but is an initial undertaking of those stages for the options set out.
- 2.8 The SA promotes sustainable development by identifying the likely sustainability effects of the proposed objectives and broad policy options for the Local Plan Update, together with making recommendations for reducing, mitigating or compensating any significant adverse effects and maximising positive effects.
- 2.9 The Appraisal generally consists of assessing the questions within the consultation document against the 22 sustainability objectives that are set out in the Sustainability Appraisal Scoping Report (July 2016). This assessment involves considering what effect the plan, policy or option will have on that objective, in the short, medium or long term, and in conjunction with other plans and policies.
- 2.10 The Appraisal then moves onto assessing each of the options for consultation set out in the Issues and Options document against the 22 sustainability objectives, in order of how they appear in the document (stages B3 and B4 of the sustainability appraisal process). This is undertaken in appendix 1.

Limitations of Sustainability Appraisal

- 2.11 A Sustainability Appraisal is an extremely valuable exercise in terms of balancing various effects against each other, and continues to be of great use in drawing up plans and policies. However, it does not represent the whole of the analysis needed. Even where one option scores most positively in terms of sustainability, it may not be appropriate for other reasons that are not highlighted here.
- 2.12 One particular factor which an SA can overlook is the likelihood of implementation. Some of these options may have much less certainty of delivery than others, and this needs to be taken into account in drawing up a plan which is supposed to be realistic and achievable. These considerations will be presented as part of the background evidence for the Proposed Submission Local Plan Update.

- 2.13 Care also needs to be taken not to treat the SA as a quantitative exercise. It is not simply a matter of how many ticks are in the appraisal. On some sites, one positive effect may outweigh several negative effects, and vice versa. Again, the background evidence to support the Proposed Submission Local Plan Update will explain why such decisions have been made.
- 2.14 The LPU consultation document includes a number of questions that will help to inform future plan making. Due to the early current stage of plan making, a number of these questions are high level and seek response around broad topic areas. As a result it is not possible to practically assess all of the questions posed in the consultation document. Appendix 1 provides further detail on how questions have been assessed.

Who carried out the Sustainability Appraisal?

- 2.15 The production of the SA is the responsibility of the local planning authority. There is no requirement that the report be prepared by an independent body to that responsible for the plan itself, which is the subject of the appraisal. Indeed, the core philosophy behind the system of sustainability appraisal is that the process informs the production of the plan, and therefore, too great an independence is not desirable.
- 2.16 This Sustainability Appraisal was drafted by officers responsible for the production of the Local Plan Update. This is appropriate at this stage, as the consideration of environmental, social and economic outcomes is the central element to deciding on the policy approach and the suitability of each site. As a result, the Sustainability Appraisal will significantly influence the content of the Local Plan Update.

Requirements of the SEA Directive

- 2.17 Table 3 sets out the requirements of the SEA Directive and signposts relevant Sections of the SA Report where these requirements are fulfilled.
- 2.18 The majority of the SEA requirements set out below were met in the SA Scoping Report which was consulted on in November 2015. A copy of the document can be found on the Council's website at <http://www.wokingham.gov.uk/local-plan-update/>

Table 4 - SEA Requirements and where these are addressed in this report

Requirement	Section of this Report
a) An outline of the contents, main objectives of the plan or programme, and relationships with other relevant plans and programmes.	1
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	3, SA Scoping Report
c) The environmental characteristics of areas likely to be significantly affected.	3, SA Scoping Report
d) Any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	SA Scoping Report
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	SA Scoping Report
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative	SA Scoping Report
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Appendix 1, SA Scoping Report
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	SA Scoping Report
i) A description of measures envisaged concerning monitoring in accordance with Article 10. Section 9	5
j) A non-technical summary of the information provided under the above headings	Non-Technical Summary

Sustainability Objectives, baseline description and context

2.19 The Council undertook a review of key planning policy and baseline information for the Borough as part of an initial 'Scoping Process'. The results of this exercise were documented in the Scoping Report which was issued for consultation in November 2015. The consultation comments were carefully considered and reviewed before a final Scoping Report was published.

3 Sustainability Objectives, Baseline Description and Context

3.1 The objectives used to appraise the Local Plan Update are set out below in Figure 4. These objectives are included in the SA Scoping Report.

Figure 4 - Wokingham Borough Sustainability Objectives

Wokingham Borough Sustainability Objectives	
SOCIAL	1. To make provision for local housing needs by ensuring that everyone has the opportunity to live in a decent sustainably constructed and affordable home
	2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment by ensuring no inappropriate development in any areas at risk of flooding and use sustainable drainage solutions and other solutions in line with advice from the Environment Agency where necessary.
	3. Safe and secure environment
	4. To improve the health and well-being of the population.
	5. To create and sustain vibrant and locally distinctive communities
	6. To reduce poverty and social exclusion
	7. To raise educational attainment, skills and training opportunities
	8. To improve accessibility to services, amenities and facilities in particular by safe walking and cycling routes
	9. To reduce road congestion and pollution levels on the local and strategic road network (SRN) by improving travel facilities and choices including safe walking and cycling routes and public transport
ENVIRONMENTAL	10. To improve efficiency in land use through the re-use of previously developed land, existing buildings, including the re-use of resources and remediation of previously developed land
	11. To minimise impacts arising from pollution and improve and prevent where possible
	12. To conserve and enhance biodiversity, including wildlife and river corridors and networks and to maximise opportunities for building in beneficial features for biodiversity including limiting the impact of climate change.
	13. To protect and enhance the countryside and historic environment
	14. To sustainably use resources (including renewable and non-renewable resources)
	15. To address waste by: reducing and minimising waste as a priority, re-use then recycle, compost or energy recovery
	16. To maintain, and, where appropriate improve water quality (including groundwater and surface water) and to achieve sustainable water resource management of both surface and groundwater flows.
	17. To maintain and where appropriate improve soil quality, and to ensure land affected by contamination is remediated to a condition suitable for use
	18. To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough

	19. Appropriate new development makes a positive contribution or makes no material harm to the character, environment, landscape and heritage within and around the Borough
ECONOMIC	20. To ensure high and stable levels of employment
	21. To encourage 'smart' economic growth
	22. Maintaining a buoyant and competitive economy with a range of jobs without adversely affecting the quality of life

- 3.2 This information was originally published in the SA scoping report and has been replicated here.
- 3.3 Figure 5 shows how the objectives were tested against one another for internal compatibility. This exercise highlights that there may be the potential for internal conflicts with what they aim to achieve.
- 3.4 The objectives have not been prioritised at this stage, but this may be necessary later in the appraisal process in the case of conflicts. When prioritising objectives it is important to recognise that the environmental requirements of the SEA must be fully met and not diluted by the prioritising of environmental objectives lower than social and economic.

Figure 5 - SA/SEA Objectives Internal Compatibility Assessment

1																						
2	✓																					
3	✓	✓																				
4	✓	✓	✓																			
5	✓			✓																		
6	✓		✓	✓																		
7				✓		✓																
8			✓	✓	✓	✓	✓															
9			✓	✓	✓	✓	✓	✓														
10	✗	✗																				
11	✓	✓	✓	✓	✓				✓	✗												
12	✗	✓		✓	✓			✓														
13	✗	✓		✓	✓			✓		✓	✓	✓	✓									
14	✓			✓	✓				✓	✓		✓	✓									
15										✓	✓			✓								
16	✓	✓	✓	✓	✓					✓	✓	✓	✓	✓	✓	✓						
17				✓						✓	✓	✓	✓	✓	✓	✓		✓				
18	✓				✓				✓	✓	✓		✓	✓	✓	✓	✓					
19	✓	✓	✓		✓	✓		✓	✓	✗	✓	✓	✓	✓	✓	✓	✓		✓			
20	✓		✓	✓	✓	✓	✓					✓	✓				✓					
21							✓		✓		✓							✓		✓		
22		✓	✓	✓		✓		✓				✓	✓	✓	✓					✓	✓	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22

KEY:

- ✓ - COMPATIBLE
- ✗ - INCOMPATIBLE
- NO RELATIONSHIP

3.5 Figure 6 represents any objectives that may be incompatible with other objectives. These objectives should still be used in the SA/SEA objectives regardless of potential conflict. As they have been highlighted at an early stage, the framework will be able to take these into consideration when appraising the Local Plan Update.

Figure 6 - Incompatible Objectives

Objective	Incompatible Objective	Incompatible Objective
10 – Improve efficiency of land through the re-use of previously developed land	1 – Local housing provision	2 – Reducing the risk of flooding
12 – Conserve and enhance biodiversity		
13 – Protect and enhance the Borough’s countryside and environment		
11 – Minimise impacts arising from pollution		
19 – New development makes a positive contribution to the character, environment, landscape and heritage within and around the Borough	10 – Improve efficiency of land through the re-use of previously developed land	

- 3.6 The objectives associated with making provision for local housing provision (objective 1) and those which aim to improve efficiency of land through the re-use of previously developed land (objective 10), to conserve and enhance the Borough’s biodiversity (objective 12) and to protect and enhance the Borough’s countryside and environment (objective 13) may be incompatible. Development can lead to environmental issues and these will be carefully managed throughout the plan. For example, development may have an effect on local biodiversity (both within and around the borough) due to increased transport and visitors. These sites will need to be carefully managed through methods such as buffer zones. In many circumstances, these issues can be satisfactorily managed through careful consideration within the plan making process.
- 3.7 There is also potential conflict between reducing the risk of flooding (objective 2) and those which aim to improve efficiency of land through the re-use of previously developed land (objective 10) and to conserve and enhance the Borough’s biodiversity (objective 12). In order to reduce the risk of flooding on previously developed land, only appropriate and sustainable development within flood zones 2, 3a and 3b will be approved. The plan

will also take into account advice from the Environment Agency regarding development in the floodplain in order to ensure no inappropriate development occurs and the wildlife and biodiversity in these areas are protected.

- 3.8 The objectives associated with improving the efficiency of land through the re-use of previously developed land (objective 10) and those which aim to minimise impacts arising from pollution (objective 11) and appropriate new development makes a positive contribution to the character, environment, landscape and heritage within the Borough (objective 19) may be incompatible. Development on previously developed land will need to be carefully considered in order to not have a detrimental effect on the character, environment, landscape and heritage within the borough. Careful planning and collaborative work with developers, such as pre application discussions, will allow the plan to satisfactorily manage the impact of such developments.

4 Appraisal of the Options

Stage B: Developing and refining alternatives and assessing effects	
B1	– Test the Local Plan objectives against the sustainability appraisal framework
B2	– Develop the Local Plan options including reasonable alternatives
B3	– Evaluate the likely effects of the Local Plan and alternatives
B4	– Consider ways of mitigating adverse effects and maximising beneficial effects
B5	– Propose measures to monitor the significant effects of implementing the Local Plan

- 4.1 B1 – The Local Plan Update is currently at the scoping stage in order to gather views on a shared vision for the Borough and a set of meaningful objectives for achieving this vision. Therefore, we will appraise the objectives at the next stage of the Local Plan Update.
- 4.2 B2 – The direction for the Local Plan Update are set out in the Consultation document itself, which provides commentary on how the options have been created.
- 4.3 B3 – This step takes in the most significant element of the SA process by assessing the likely effects of the options that have been identified for the Local Plan Update. Questions 1, 6, 9 and 10 posed in the consultation document are assessed against each of the 22 sustainability objectives and an evaluation of each option can be found in appendix 1. Due to the scope of the consultation, it is not possible to realistically assess some of the questions. At the Draft Plan stage a series of alternative growth options and scenarios will be assessed alongside the preferred approach.
- 4.4 B4 – The assessment should consider whether there are measures that can be taken to mitigate adverse effects or to emphasise the positive effects. At this stage of the plan, the commentary surrounding possible measures will be in general terms. However, at a later stage when the draft plan is being appraised, the references can be more specific and relate to possible changes to policies elsewhere in the document, or other specific measures that can be taken.
- 4.5 B5 – The proposed measures to monitor any significant effects of implementing the Local Plan can be found in chapter 5 of the SA/SEA document.

5 Implementation and Monitoring Proposals

- 5.1 The SEA Directive (European Directive 2001/42/EC “The assessment of the effects of certain plans and programmes on the Environment”) requires that the significant environmental effects of implementing a plan or programme should be monitored in order to identify at an early stage any unforeseen adverse effects, and to be able to undertake appropriate remedial action. SA monitoring will cover the significant sustainability effects as well as the environmental effects.
- 5.2 The suggested monitoring system includes (sourced from the European Commission, 2003):
- Determination of the scope of monitoring
 - Identification of the necessary information
 - Identification of existing sources of information
 - Data at project level
 - General environmental monitoring and
 - Other data
 - Filling the gaps
 - Procedural integration of monitoring into the planning system
 - Taking remedial action
- 5.3 In particular and in line with the guidance, monitoring will be focused on significant environmental effects, such as those;
- Which indicate a likely breach of international, national and local legislation, recognised guidelines or standards
 - That may give rise to irreversible damage with a view to identifying trends before such damage occurs
 - Where there was uncertainty over possible adverse effects, and where monitoring would enable mitigation measures to be taken.
- 5.4 Monitoring should involve measuring indicators which enable a causal link to be established between the Local Plan Update and the likely significant effects being monitored. Potential indicators have been proposed in the Scoping Report (appendix 2) for each objective, drawing from existing sources to ensure the recording of data for the indicator is established (at local, sub regional / regional and national level). The effectiveness of policies will look to be assessed against measurable targets.

Appendix 1 - Local Plan Update Consultation Appraisal

Commentary on the Assessment where compatibility is unclear

At this early stage of producing the Local Plan Update, questions were developed to understand the issues relating to the borough. One question in the Local Plan Update asked where the best opportunities are to establish new communities. This option has therefore been appraised alongside a number of others to evaluate its likely effects, and inform future plan making.

As outlined earlier in the report, the high-level nature of the questions means it is not practical to assess each individually. Where practical questions have been assessed against the Objectives as detailed in the below table.

As part of a proportionate approach to this assessment, consultation questions that ask whether the respondent agrees with a statement, have been assessed using three responses rather than the five posed in the questions. This is because limited differences between some consultation responses are difficult to assess through this process as there is often limited quantifiable difference at this early stage. As a result, the responses of 'agree' 'neutral' and 'disagree' have been assessed. To create a more balanced assessment, for the purposes of this document, 'neutral' means a combination of the approaches suggested.

Each option was assessed individually with regards to impact and time.

Key

✓ ✓	Option has a major positive impact on the SA Objective
✓	Option has a minor positive impact on the SA Objective
-	Option has a neutral impact on the SA Objective
x	Option has a minor negative impact on the SA Objective
xx	Option has a major negative impact on the SA Objective
?	Impact is uncertain
ST	Short Term (during the construction of new development)
MT	Medium Term (5 to 10 years post completion of new development)
LT	Long Term (Over 10 years post completion of new development)

QUESTION 1: Do you agree that the new housing we need should be built in new communities, which would be built with their own schools, roads, community and sports facilities and other associated infrastructure?									
SA Objective	Approach 1 - Agree – Deliver the majority of development in a small number of large developments that provide for their own infrastructure needs			Approach 2 Neutral – A combination of large and small sties			Approach 3 Disagree – A large number of smaller developments around the Borough		
	ST	MT	LT	ST	MT	LT	ST	MT	LT
1. To make provision for local housing needs by ensuring that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓ ✓	✓ ✓	✓	✓	✓	✓	✓	✓
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment by ensuring no inappropriate development in any areas at risk of flooding and use sustainable drainage solutions and other solutions in line with advice from the Environment Agency where necessary.	✓	✓	✓	?	?	?	?	?	?
3. Safe and secure environment	✓	✓ ✓	✓ ✓	✓	✓	✓	✓	✓	✓
4. To improve the health and well-being of the population.	✓	✓ ✓	✓ ✓	-	-	-	x	x	x
5. To create and sustain vibrant and locally distinctive communities	✓	✓ ✓	✓ ✓	✓	✓	✓	?	?	?
6. To reduce poverty and social exclusion	?	?	?	?	?	?	?	?	?
7. To raise educational attainment, skills and training opportunities	✓	✓	✓	-	-	-	-	-	-

QUESTION 1: Do you agree that the new housing we need should be built in new communities, which would be built with their own schools, roads, community and sports facilities and other associated infrastructure?									
SA Objective	Approach 1 - Agree -			Approach 2 Neutral -			Approach 3 Disagree		
8. To improve accessibility to services, amenities and facilities in particular by safe walking and cycling routes	-	✓ ✓	✓ ✓	✓	✓	✓	-	-	-
9. To reduce road congestion and pollution levels on the local and strategic road network (SRN) by improving travel facilities and choices including safe walking and cycling routes and public transport	x	✓	✓	x	-	-	-	-	-
10. To improve efficiency in land use through the re-use of previously developed land, existing buildings, including the re-use of resources and remediation of previously developed land	xx	xx	xx	?	?	?	?	?	?
11. To minimise impacts arising from pollution and improve and prevent where possible	xx	-	-	xx	x	x	xx	x	x
12. To conserve and enhance biodiversity, including wildlife and river corridors and networks and to maximise opportunities for building in beneficial features for biodiversity including limiting the impact of climate change.	-	✓	✓	-	✓	✓	-	-	-
13. To protect and enhance the countryside and historic environment	-	-	-	-	-	-	?	?	?
14. To sustainably use resources (including renewable and non-renewable resources)	-	-	-	-	-	-	-	-	-
15. To address waste by: reducing and minimising waste as a priority, re-use then recycle, compost or energy recovery	✓	✓ ✓	✓ ✓	-	-	-	-	-	-

QUESTION 1: Do you agree that the new housing we need should be built in new communities, which would be built with their own schools, roads, community and sports facilities and other associated infrastructure?									
SA Objective	Approach 1 - Agree –			Approach 2 Neutral –			Approach 3 Disagree		
16. To maintain, and, where appropriate improve water quality (including groundwater and surface water) and to achieve sustainable water resource management of both surface and groundwater flows.	✓	✓	✓	✓	✓	✓	✓	✓	✓
17. To maintain and where appropriate improve soil quality, and to ensure land affected by contamination is remediated to a condition suitable for use	?	?	?	?	?	?	?	?	?
18. To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough	✓	✓	✓	✓	✓	✓	✓	✓	✓
19. Appropriate new development makes a positive contribution or makes no material harm to the character, environment, landscape and heritage within and around the Borough	✓	✓	✓	-	-	-	-	-	-
20. To ensure high and stable levels of employment	✓	✓ ✓	✓ ✓	✓	✓	✓	✓	✓	✓
21. To encourage 'smart' economic growth	✓	✓ ✓	✓ ✓	✓	✓ ✓	✓ ✓	✓	✓	✓
22. Maintaining a buoyant and competitive economy with a range of jobs without adversely affecting the quality of life	✓	✓ ✓	✓ ✓	✓	✓ ✓	✓ ✓	✓	✓	✓

Conclusions from the appraisal of the questions

An important element of predicting and evaluating the impacts of policies within the Local Plan Update is to consider the likelihood of a range of effects relating to the nature of, scale and time when implementing new policies. Examples of cumulative, secondary and synergistic effects include loss of tranquillity, changes in the landscape, economic decline and climate change.

The policies within the Local Plan Update are assessed for their individual impacts, but there may be collective effects which occur as a result of the policies being implemented in combination. These impacts may be greater than the sum of implementing individual policies. Good practice suggests that cumulative impact assessment should be conducted throughout and as an integrated component of the SA process.

Area	Approach 1	Approach 2	Approach 3
Likelihood - High, Medium or Low	Medium	High	Low
Scale - Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global
Permanence - Temporary or Permanent	Permanent	Permanent	Permanent
Effect - Secondary, Cumulative or Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects
Commentary including positive and negative effects	This approach involves providing development on larger sites that can provide the much-needed infrastructure to deliver sustainable communities that can be incorporated into the developments more readily. This approach would see a reduction in greenfield land and impact negatively upon objectives 10 and 11.	Combining all or some of the options could negatively impact the boroughs characteristic due to this sporadic approach. Existing infrastructure may not be able to cope with the new developments and planning for sustainable developments would be difficult as this is an ad-hoc approach.	This approach would result in a large number of small developments around the Borough that would place an extra strain on the infrastructure that is already in place. This option would have similar negative effects to option 1.

Mitigation	<p>A large number of the effects identified above are negative, but many of these can be mitigated through the right combination of policies in the plan. The environmental performance of houses can be mitigated through sustainable design measures, although the Council's ability to apply these has been reduced by the removal of the Code for Sustainable Homes. Effects on flood risk and biodiversity may be capable of mitigation on site, although further site specific work would be needed. Effects on townscape and the historic environment can be addressed by design measures, but the ability to address the issue reduces as the proposed level of housing increases. Provision of new infrastructure, e.g. education and healthcare, can mitigate negative impacts.</p>
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6. Do you agree with being more flexible with building heights, parking standards and development densities, where a range of shops of other services are within walking distance, such as towns and district centres									
SA Objective	Approach 1 Agree – Deliver a higher densities of housing in town/district centres			Approach 2 Neutral – deliver a combination of different densities in town/district centres			Approach 3 Disagree – Deliver a lower density of housing in town/district centres		
	ST	MT	LT	ST	MT	LT	ST	MT	LT
1. To make provision for local housing needs by ensuring that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓ ✓	✓ ✓	✓	✓	✓	?	?	?
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment by ensuring no inappropriate development in any areas at risk of flooding and use sustainable drainage solutions and other solutions in line with advice from the Environment Agency where necessary.	✓	✓	✓	✓	✓	✓	✓	✓	✓

6. Do you agree with being more flexible with building heights, parking standards and development densities, where a range of shops of other services are within walking distance, such as towns and district centres									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 Disagree –		
3. Safe and secure environment	?	?	?	?	?	?	?	?	?
4. To improve the health and well-being of the population.	✓	✓ ✓	✓ ✓	✓	✓ ✓	✓ ✓	x	x	x
5. To create and sustain vibrant and locally distinctive communities	✓	✓ ✓	✓ ✓	✓	✓	✓	-	-	-
6. To reduce poverty and social exclusion	✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
7. To raise educational attainment, skills and training opportunities	✓	✓	✓	✓	✓	✓	?	?	?
8. To improve accessibility to services, amenities and facilities in particular by safe walking and cycling routes	✓	✓ ✓	✓ ✓	✓	✓ ✓	✓ ✓	x	x	x
9. To reduce road congestion and pollution levels on the local and strategic road network (SRN) by improving travel facilities and choices including safe walking and cycling routes and public transport	✓	✓ ✓	✓ ✓	✓	✓ ✓	✓ ✓	x	x	x
10. To improve efficiency in land use through the re-use of previously developed land, existing buildings, including the re-use of resources and remediation of previously developed land	✓	✓	✓	✓	✓	✓	xx	xx	xx
11. To minimise impacts arising from pollution and improve and prevent where possible	?	?	?	?	?	?	?	?	?
12. To conserve and enhance biodiversity, including wildlife and river corridors and networks and to maximise opportunities for building in beneficial features for biodiversity including limiting the impact of climate change.	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x

6. Do you agree with being more flexible with building heights, parking standards and development densities, where a range of shops of other services are within walking distance, such as towns and district centres									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 Disagree –		
13. To protect and enhance the countryside and historic environment	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
14. To sustainably use resources (including renewable and non-renewable resources)	?	?	?	?	?	?	?	?	?
15. To address waste by: reducing and minimising waste as a priority, re-use then recycle, compost or energy recovery	?	?	?	?	?	?	?	?	?
16. To maintain, and, where appropriate improve water quality (including groundwater and surface water) and to achieve sustainable water resource management of both surface and groundwater flows.	?	?	?	?	?	?	?	?	?
17. To maintain and where appropriate improve soil quality, and to ensure land affected by contamination is remediated to a condition suitable for use	✓	✓	✓	✓	✓	✓	?	?	?
18. To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough	-	-	-	-	-	-	-	-	-
19. Appropriate new development makes a positive contribution or makes no material harm to the character, environment, landscape and heritage within and around the Borough	✓	✓	✓	✓	✓	✓	?	?	?
20. To ensure high and stable levels of employment	✓	✓	✓	✓	✓	✓	?	?	?
21. To encourage 'smart' economic growth	✓	✓	✓	✓	✓	✓	-	-	-
22. Maintaining a buoyant and competitive economy with a range of jobs without adversely affecting the quality of life	✓	✓	✓	✓	✓	✓	-	-	-

Conclusions from the appraisal of the questions

Area	Approach 1	Approach 2	Approach 3
Likelihood - High, Medium or Low	High	Medium	Low
Scale - Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global
Permanence - Temporary or Permanent	Permanent	Permanent	Permanent
Effect - Secondary, Cumulative or Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects
Commentary including positive and negative effects	Higher density development in existing town and district centres, provides opportunities to deliver more sustainable communities through the reuse of brownfield land and access to transport hubs. This may make the most efficient use of brownfield land and support objective 10. This approach may reduce the need for greenfield land, and impact negatively upon objective 3.	Mixed densities in town and district centres could see their character negatively impacted due to loss of greenfield land in these urban areas. However, it does create the opportunity to provide improved the health and well-being in these areas as the population would be within close proximity to key facilities	Low densities in town and district centres would result in extra strain on the infrastructure that is already in place and would not create sustainable communities. This option would impact negatively on objectives 10 and 12
Mitigation	A large number of the effects identified above are negative, but many of these can be mitigated through the right combination of policies in the plan.. Effects on flood risk and biodiversity may be capable of mitigation on site, although further site specific work would be needed. Effects on townscape and the historic environment can be addressed by design measures, but the ability to address the issue reduces as the proposed level of housing increases. Provision of new infrastructure, e.g. education and healthcare, can mitigate negative impacts.		

6. Do you agree with being more flexible with building heights, parking standards and development densities, where a range of shops of other services are within walking distance, such as towns and district centres									
SA Objective	Approach 1 Agree – High flexibility with building heights in the town/district centres			Approach 2 Neutral – some flexibility in building heights in town/district centres			Approach 3 Disagree – No flexibility in building heights in town/district centres		
	ST	MT	LT	ST	MT	LT	ST	MT	LT
1. To make provision for local housing needs by ensuring that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓ ✓	✓ ✓	✓	✓	✓	?	?	?
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment by ensuring no inappropriate development in any areas at risk of flooding and use sustainable drainage solutions and other solutions in line with advice from the Environment Agency where necessary.	✓	✓	✓	✓	✓	✓	✓	✓	✓
3. Safe and secure environment	?	?	?	?	?	?	?	?	?
4. To improve the health and well-being of the population.	✓	✓ ✓	✓ ✓	✓	✓ ✓	✓ ✓	x	x	x
5. To create and sustain vibrant and locally distinctive communities	✓	✓ ✓	✓ ✓	✓	✓	✓	-	-	-
6. To reduce poverty and social exclusion	✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
7. To raise educational attainment, skills and training opportunities	✓	✓	✓	✓	✓	✓	?	?	?
8. To improve accessibility to services, amenities and facilities in particular by safe walking and cycling routes	✓	✓ ✓	✓ ✓	✓	✓ ✓	✓ ✓	x	x	x

6. Do you agree with being more flexible with building heights, parking standards and development densities, where a range of shops of other services are within walking distance, such as towns and district centres									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 Disagree –		
9. To reduce road congestion and pollution levels on the local and strategic road network (SRN) by improving travel facilities and choices including safe walking and cycling routes and public transport	✓	✓ ✓	✓ ✓	✓	✓ ✓	✓ ✓	x	x	x
10. To improve efficiency in land use through the re-use of previously developed land, existing buildings, including the re-use of resources and remediation of previously developed land	✓	✓ ✓	✓ ✓	✓	✓	✓	xx	xx	xx
11. To minimise impacts arising from pollution and improve and prevent where possible	?	?	?	?	?	?	?	?	?
12. To conserve and enhance biodiversity, including wildlife and river corridors and networks and to maximise opportunities for building in beneficial features for biodiversity including limiting the impact of climate change.	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
13. To protect and enhance the countryside and historic environment	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
14. To sustainably use resources (including renewable and non-renewable resources)	?	?	?	?	?	?	?	?	?
15. To address waste by: reducing and minimising waste as a priority, re-use then recycle, compost or energy recovery	?	?	?	?	?	?	?	?	?
16. To maintain, and, where appropriate improve water quality (including groundwater and surface water) and to achieve sustainable water resource management of both surface and groundwater flows.	?	?	?	?	?	?	?	?	?

6. Do you agree with being more flexible with building heights, parking standards and development densities, where a range of shops of other services are within walking distance, such as towns and district centres									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 Disagree –		
17. To maintain and where appropriate improve soil quality, and to ensure land affected by contamination is remediated to a condition suitable for use	✓	✓	✓	✓	✓	✓	?	?	?
18. To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough	-	-	-	-	-	-	-	-	-
19. Appropriate new development makes a positive contribution or makes no material harm to the character, environment, landscape and heritage within and around the Borough	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	?	?	?
20. To ensure high and stable levels of employment	✓	✓	✓	✓	✓	✓	?	?	?
21. To encourage 'smart' economic growth	✓	✓	✓	✓	✓	✓	-	-	-
22. Maintaining a buoyant and competitive economy with a range of jobs without adversely affecting the quality of life	✓	✓	✓	✓	✓	✓	-	-	-

Conclusions from the appraisal of the questions

Area	Approach 1	Approach 2	Approach 3
Likelihood - High, Medium or Low	High	Medium	Low
Scale - Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global
Permanence - Temporary or Permanent	Permanent	Permanent	Permanent
Effect - Secondary, Cumulative or Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects

<p>Commentary including positive and negative effects</p>	<p>Allowing more flexibility in building heights in existing town and district centres, provides opportunities to deliver more sustainable communities through the reuse of brownfield land and access to transport hubs. This approach potentially may see the reduction in greenfield land negatively impacting upon objectives 3 and 11.</p>	<p>Allowing for some flexibility in building heights in the town and district centres creates the opportunity to provide improved the health and well-being in these areas as the population would be in close proximity to all key facilities.</p>	<p>Allowing for no flexibility in building heights in the town district centres would result in a bigger strain on resources and has the potential to impact on the character of the borough. This would increase the likelihood of negative impacts on objectives 10 and 12.</p>
<p>Mitigation</p>	<p>A large number of the effects identified above are negative, but many of these can be mitigated through the right combination of policies in the plan. Effects on flood risk and biodiversity may be capable of mitigation on site, although further site specific work would be needed. Effects on townscape and the historic environment can be addressed by design measures, but the ability to address the issue reduces as the proposed level of housing increases. Provision of new infrastructure, e.g. education and healthcare, can mitigate negative impacts.</p>		

QUESTION 10: Do you agree with being more flexible with building heights on existing employment estates to create more useable space without needing to increase the amount of land?									
SA Objective	Approach 1 Agree – High flexibility with building heights in the town/district centres			Approach 2 Neutral – some flexibility with building heights in town/district centres			Approach 3 Disagree – No flexibility in building heights in town/district centres		
	ST	MT	LT	ST	MT	LT	ST	MT	LT
1. To make provision for local housing needs by ensuring that everyone has the opportunity to live in a decent sustainably constructed and affordable home	-	-	-	-	-	-	-	-	-
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment by ensuring no inappropriate development in any areas at risk of flooding and use sustainable drainage solutions and other solutions in line with advice from the Environment Agency where necessary.	✓	✓	✓	✓	✓	✓	✓	✓	✓
3. Safe and secure environment	?	?	?	?	?	?	?	?	?
4. To improve the health and well-being of the population.	?	?	?	?	?	?	?	?	?
5. To create and sustain vibrant and locally distinctive communities	?	?	?	?	?	?	?	?	?
6. To reduce poverty and social exclusion	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓
7. To raise educational attainment, skills and training opportunities	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓
8. To improve accessibility to services, amenities and facilities in particular by safe walking and cycling routes	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x

QUESTION 10: Do you agree with being more flexible with building heights on existing employment estates to create more useable space without needing to increase the amount of land?									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 Disagree		
9. To reduce road congestion and pollution levels on the local and strategic road network (SRN) by improving travel facilities and choices including safe walking and cycling routes and public transport	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
10. To improve efficiency in land use through the re-use of previously developed land, existing buildings, including the re-use of resources and remediation of previously developed land	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
11. To minimise impacts arising from pollution and improve and prevent where possible	?	?	?	?	?	?	?	?	?
12. To conserve and enhance biodiversity, including wildlife and river corridors and networks and to maximise opportunities for building in beneficial features for biodiversity including limiting the impact of climate change.	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
13. To protect and enhance the countryside and historic environment	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
14. To sustainably use resources (including renewable and non-renewable resources)	?	?	?	?	?	?	?	?	?
15. To address waste by: reducing and minimising waste as a priority, re-use then recycle, compost or energy recovery	?	?	?	?	?	?	?	?	?
16. To maintain, and, where appropriate improve water quality (including groundwater and surface water) and to achieve sustainable water resource management of both surface and groundwater flows.	?	?	?	?	?	?	?	?	?

QUESTION 10: Do you agree with being more flexible with building heights on existing employment estates to create more useable space without needing to increase the amount of land?									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 Disagree		
17. To maintain and where appropriate improve soil quality, and to ensure land affected by contamination is remediated to a condition suitable for use	✓	✓	✓	✓	✓	✓	?	?	?
18. To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough	-	-	-	-	-	-	-	-	-
19. Appropriate new development makes a positive contribution or makes no material harm to the character, environment, landscape and heritage within and around the Borough	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
20. To ensure high and stable levels of employment	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
21. To encourage 'smart' economic growth	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	-
22. Maintaining a buoyant and competitive economy with a range of jobs without adversely affecting the quality of life	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x

Conclusions from the appraisal of the questions

Area	Approach 1	Approach 2	Approach 3
Likelihood - High, Medium or Low	High	Medium	Low
Scale - Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global
Permanence - Temporary or Permanent	Permanent	Permanent	Permanent
Effect - Secondary, Cumulative or Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects
Commentary including positive and negative effects	Allowing more flexibility in building heights in existing town and district centres, provides	Allowing for some flexibility in building heights in the town and district centres	Allowing for no flexibility in building heights in town and district centres would result in

	<p>opportunities to deliver more sustainable communities through the reuse of brownfield land and access to transport hubs. It also creates the opportunity to provide improved health and well-being in these areas as the population would be within close proximity to all key facilities, and has positive impacts on objectives 8, 10, 20, 21 and 22. This approach also has potentially unknown effects especially against objectives 3 and 11.</p>	<p>creates the opportunity to provide improved health and well-being in these areas as the population would be within close proximity to all key facilities. This would impact positively on objectives 8 and 10 in particular.</p>	<p>a bigger strain on resources and has the potential to impact on the character of the borough. It performs negatively against a number of objectives, specifically 20, 21 and 22, which are all economically driven objectives.</p>
Mitigation	<p>Some of the effects identified above are negative, but many of these can be mitigated through the right combination of policies in the plan. Effects on flood risk and biodiversity may be capable of mitigation on site, although further site specific work would be needed. Effects on townscape and the historic environment can be addressed by design measures, but the ability to address the issue reduces as the proposed level of employment land increases. Provision of new infrastructure, in particular the highways network, can mitigate negative impacts though how such proposals interact with other uses such as housing will be important.</p>		

Question 9i - Do you agree with meeting employment needs in Town and District Centres?									
SA Objective	Approach 1 Agree – All employment need should be met in Town and District Centres			Approach 2 Neutral – Some of the employment need should be met in the Town and District Centres			Approach 3 Disagree – None of the employment need should be met in the Town and District Centres		
	ST	MT	LT	ST	MT	LT	ST	MT	LT
1. To make provision for local housing needs by ensuring that everyone has the opportunity to live in a decent sustainably constructed and affordable home	-	-	-	-	-	-	-	-	-
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment by ensuring no inappropriate development in any areas at risk of flooding and use sustainable drainage solutions and other solutions in line with advice from the Environment Agency where necessary.	✓	✓	✓	✓	✓	✓	✓	✓	✓
3. Safe and secure environment	?	?	?	?	?	?	?	?	?
4. To improve the health and well-being of the population.	?	?	?	?	?	?	?	?	?
5. To create and sustain vibrant and locally distinctive communities	?	?	?	?	?	?	?	?	?
6. To reduce poverty and social exclusion	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓
7. To raise educational attainment, skills and training opportunities	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓

Question 9i - Do you agree with meeting employment needs in Town and District Centres?									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 Disagree –		
8. To improve accessibility to services, amenities and facilities in particular by safe walking and cycling routes	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
9. To reduce road congestion and pollution levels on the local and strategic road network (SRN) by improving travel facilities and choices including safe walking and cycling routes and public transport	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
10. To improve efficiency in land use through the re-use of previously developed land, existing buildings, including the re-use of resources and remediation of previously developed land	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
11. To minimise impacts arising from pollution and improve and prevent where possible	?	?	?	?	?	?	?	?	?
12. To conserve and enhance biodiversity, including wildlife and river corridors and networks and to maximise opportunities for building in beneficial features for biodiversity including limiting the impact of climate change.	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
13. To protect and enhance the countryside and historic environment	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
14. To sustainably use resources (including renewable and non-renewable resources)	?	?	?	?	?	?	?	?	?
15. To address waste by: reducing and minimising waste as a priority, re-use then recycle, compost or energy recovery	?	?	?	?	?	?	?	?	?

Question 9i - Do you agree with meeting employment needs in Town and District Centres?									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 Disagree –		
16. To maintain, and, where appropriate improve water quality (including groundwater and surface water) and to achieve sustainable water resource management of both surface and groundwater flows.	?	?	?	?	?	?	?	?	?
17. To maintain and where appropriate improve soil quality, and to ensure land affected by contamination is remediated to a condition suitable for use	✓	✓	✓	✓	✓	✓	?	?	?
18. To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough	-	-	-	-	-	-	-	-	-
19. Appropriate new development makes a positive contribution or makes no material harm to the character, environment, landscape and heritage within and around the Borough	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	?	?	?
20. To ensure high and stable levels of employment	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
21. To encourage 'smart' economic growth	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	-
22. Maintaining a buoyant and competitive economy with a range of jobs without adversely affecting the quality of life	✓	✓	✓	✓	✓	✓	x	x	x

Conclusions from the appraisal of the questions

Area	Approach 1	Approach 2	Approach 3
Likelihood - High, Medium or Low	Medium	High	Low
Scale - Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global
Permanence - Temporary or Permanent	Permanent	Permanent	Permanent

Effect - Secondary, Cumulative or Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects
Commentary including positive and negative effects	<p>Focusing all the employment need in existing town and district centres, provides opportunities to deliver more sustainable communities through the reuse of brownfield land and access to transport hubs, thereby supporting objective 11. This would support Objective 22. It also creates the opportunity to provide improved health and well-being in these areas as the population would be in close proximity to all key facilities. This approach has potentially unknown effect especially against objectives 3 and 11.</p>	<p>Focusing some of the employment need in existing town and district centres creates the opportunity to provide improved health and well-being in these areas as the population would be within close proximity to all key facilities, thereby supporting objective 11. Even though it does not perform as well against the objectives as option 1, providing some of the need elsewhere would allow for a more buoyant and competitive economy as different types of employment will be provided.</p>	<p>Focusing none of the employment need in existing town and district centres would result in a bigger strain on resources and has the potential to impact on the character of the borough. It performs negatively against a number of objectives, specifically 20, 21 and 22, which are all economically driven objectives.</p>
Mitigation	<p>Some of the effects identified above are negative, but many of these can be mitigated through the right combination of policies in the plan. Effects on flood risk and biodiversity may be capable of mitigation on site, although further site-specific work would be needed. Effects on townscape and the historic environment can be addressed by design measures, but the ability to address the issue reduces as the proposed level of employment land increases. Provision of new infrastructure, in particular the highways network, can mitigate negative impacts though how such proposals interact with other uses such as housing will be important.</p>		

Question 9ii : Do you agree with meeting employment needs at existing employment estates and locations									
SA Objective	Approach 1 Agree – All employment need should be met in existing employment estates and locations			Approach 2 Neutral – Some of the employment need should be met in existing employment estates and locations			Approach 3 Disagree – None of the employment need should be met in the existing employment estates and locations		
	ST	MT	LT	ST	MT	LT	ST	MT	LT
1. To make provision for local housing needs by ensuring that everyone has the opportunity to live in a decent sustainably constructed and affordable home	-	-	-	-	-	-	-	-	-
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment by ensuring no inappropriate development in any areas at risk of flooding and use sustainable drainage solutions and other solutions in line with advice from the Environment Agency where necessary.	✓	✓	✓	✓	✓	✓	✓	✓	✓
3. Safe and secure environment	?	?	?	?	?	?	?	?	?
4. To improve the health and well-being of the population.	?	?	?	?	?	?	?	?	?
5. To create and sustain vibrant and locally distinctive communities	?	?	?	?	?	?	?	?	?

Question 9ii : Do you agree with meeting employment needs at existing employment estates and locations									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 Disagree –		
6. To reduce poverty and social exclusion	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓
7. To raise educational attainment, skills and training opportunities	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓
8. To improve accessibility to services, amenities and facilities in particular by safe walking and cycling routes	✓	✓	✓	✓	✓	✓	x	x	x
9. To reduce road congestion and pollution levels on the local and strategic road network (SRN) by improving travel facilities and choices including safe walking and cycling routes and public transport	✓	✓	✓	✓	✓	✓	x	x	x
10. To improve efficiency in land use through the re-use of previously developed land, existing buildings, including the re-use of resources and remediation of previously developed land	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
11. To minimise impacts arising from pollution and improve and prevent where possible	?	?	?	?	?	?	?	?	?
12. To conserve and enhance biodiversity, including wildlife and river corridors and networks and to maximise opportunities for building in beneficial	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x

Question 9ii : Do you agree with meeting employment needs at existing employment estates and locations									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 Disagree –		
features for biodiversity including limiting the impact of climate change.									
13. To protect and enhance the countryside and historic environment	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
14. To sustainably use resources (including renewable and non-renewable resources)	?	?	?	?	?	?	?	?	?
15. To address waste by: reducing and minimising waste as a priority, re-use then recycle, compost or energy recovery	?	?	?	?	?	?	?	?	?
16. To maintain, and, where appropriate improve water quality (including groundwater and surface water) and to achieve sustainable water resource management of both surface and groundwater flows.	?	?	?	?	?	?	?	?	?
17. To maintain and where appropriate improve soil quality, and to ensure land affected by contamination is remediated to a condition suitable for use	✓	✓	✓	✓	✓	✓	?	?	?
18. To increase energy efficiency and the proportion of energy generated from renewable sources in the	-	-	-	-	-	-	-	-	-

Question 9ii : Do you agree with meeting employment needs at existing employment estates and locations									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 Disagree –		
Borough									
19. Appropriate new development makes a positive contribution or makes no material harm to the character, environment, landscape and heritage within and around the Borough	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
20. To ensure high and stable levels of employment	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x
21. To encourage ‘smart’ economic growth	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	-
22. Maintaining a buoyant and competitive economy with a range of jobs without adversely affecting the quality of life	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	x	x	x

Conclusions from the appraisal of the questions

Area	Approach 1	Approach 2	Approach 3
Likelihood - High, Medium or Low	Medium	High	low
Scale - Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global
Permanence - Temporary or Permanent	Permanent	Permanent	Permanent
Effect - Secondary, Cumulative or Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects

Commentary including positive and negative effects	Focusing all the employment need in existing employment estates and locations, provides opportunities to deliver higher levels of employment as well as a sustainable communities through the reuse of brownfield land and access to transport hubs, thereby supporting objective 10. It also ensures all three of the employment objectives are positively met.	Focusing some of the employment need on existing employment estates and locations provides the opportunity to provide improved health and wellbeing in these areas, as the population would be within close proximity to all key facilities. Even though it does not perform as well against the objectives as option 1, providing some of the need elsewhere would allow for a more buoyant and competitive economy and the opportunity to improve infrastructure elsewhere.	Focusing none of the employment need on existing employment estates and locations would result in a bigger strain on resources and has the potential to impact on the character of the borough. It performs negatively against a number of objectives, specifically 20, 21 and 22, which are all economically driven objectives.
Mitigation	Some of the effects identified above are negative, but many of these can be mitigated through the right combination of policies in the plan. Effects on flood risk and biodiversity may be capable of mitigation on site, although further site specific work would be needed. Effects on townscape and the historic environment can be addressed by design measures, but the ability to address the issue reduces as the proposed level of housing increases. Provision of new infrastructure, in particular the highways network, can mitigate negative impacts though how such proposals interact with other uses such as housing will be important.		

Conclusions from the appraisal of the questions

Question 9iii: Do you agree with meeting employment needs on land adjacent to existing employment estates and locations									
SA Objective	Approach 1 Agree – All employment need should be met on Land adjacent to existing employment estates and locations			Approach 2 Neutral – Some of the employment need should be met on Land adjacent to existing employment estates and locations			Approach 3 - Disagree None of the employment need should be met on Land adjacent to existing employment estates and locations		
	ST	MT	LT	ST	MT	LT	ST	MT	LT

Question 9iii: Do you agree with meeting employment needs on land adjacent to existing employment estates and locations									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 - Disagree		
1. To make provision for local housing needs by ensuring that everyone has the opportunity to live in a decent sustainably constructed and affordable home	-	-	-	-	-	-	-	-	-
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment by ensuring no inappropriate development in any areas at risk of flooding and use sustainable drainage solutions and other solutions in line with advice from the Environment Agency where necessary.	✓	✓	✓	✓	✓	✓	✓	✓	✓
3. Safe and secure environment	?	?	?	?	?	?	?	?	?
4. To improve the health and well-being of the population.	?	?	?	?	?	?	?	?	?
5. To create and sustain vibrant and locally distinctive communities	?	?	?	?	?	?	?	?	?
6. To reduce poverty and social exclusion	✓	✓	✓	✓	✓	✓	✓	✓	✓
7. To raise educational attainment, skills and training opportunities	✓	✓	✓	✓	✓	✓	✓	✓	✓
8. To improve accessibility to services, amenities and facilities in particular by safe walking and cycling routes	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	?	?	?

Question 9iii: Do you agree with meeting employment needs on land adjacent to existing employment estates and locations									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 - Disagree		
9. To reduce road congestion and pollution levels on the local and strategic road network (SRN) by improving travel facilities and choices including safe walking and cycling routes and public transport	✓ ✓	✓ ✓	✓ ✓	✓	✓	✓	?	?	?
10. To improve efficiency in land use through the re-use of previously developed land, existing buildings, including the re-use of resources and remediation of previously developed land	✓	✓	✓	✓	✓	✓	?	?	?
11. To minimise impacts arising from pollution and improve and prevent where possible	?	?	?	?	?	?	?	?	?
12. To conserve and enhance biodiversity, including wildlife and river corridors and networks and to maximise opportunities for building in beneficial features for biodiversity including limiting the impact of climate change.	x	x	x	✓	✓	✓	✓	✓	✓
13. To protect and enhance the countryside and historic environment	?	?	?	✓	✓	✓	?	?	?
14. To sustainably use resources (including renewable and non-renewable resources)	?	?	?	?	?	?	?	?	?
15. To address waste by: reducing and minimising waste as a priority, re-use then recycle, compost or energy recovery	?	?	?	?	?	?	?	?	?

Question 9iii: Do you agree with meeting employment needs on land adjacent to existing employment estates and locations									
SA Objective	Approach 1 Agree –			Approach 2 Neutral –			Approach 3 - Disagree		
16. To maintain, and, where appropriate improve water quality (including groundwater and surface water) and to achieve sustainable water resource management of both surface and groundwater flows.	?	?	?	?	?	?	?	?	?
17. To maintain and where appropriate improve soil quality, and to ensure land affected by contamination is remediated to a condition suitable for use	✓	✓	✓	✓	✓	✓	?	?	?
18. To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough	-	-	-	-	-	-	-	-	-
19. Appropriate new development makes a positive contribution or makes no material harm to the character, environment, landscape and heritage within and around the Borough	✓	✓	✓	✓	✓	✓	✓	✓	✓
20. To ensure high and stable levels of employment	✓	✓	✓ ✓	✓	✓	✓	x	x	x
21. To encourage 'smart' economic growth	✓	✓	✓ ✓	✓	✓	✓	x	x	-
22. Maintaining a buoyant and competitive economy with a range of jobs without adversely affecting the quality of life	✓	✓	✓ ✓	✓	✓	✓	x	x	x

Conclusions from the appraisal of the questions

Area	Approach 1	Approach 2	Approach 3
Likelihood - High, Medium or Low	Medium	High	Low
Scale - Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National,

			Global
Permanence - Temporary or Permanent	Permanent	Permanent	Permanent
Effect - Secondary, Cumulative or Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects
Commentary including positive and negative effects	Focusing all the employment need on land adjacent to existing employment estates and locations provides opportunities to deliver higher levels of employment and a more diverse range of jobs. However, in the short to medium term it is only going to have minor positive effects.	Focusing some of the employment need on Land adjacent to existing employment estates and locations provides the opportunity to expand existing employment locations. This approach performs positively against objectives 20, 21, 22.	Focusing none of the employment need on land adjacent to existing employment estates and locations creates a lot of uncertainty against all the objectives with the impact being largely unknown.
Mitigation	Some of the effects identified above are negative, but many of these can be mitigated through the right combination of policies in the plan. Effects on flood risk and biodiversity may be capable of mitigation on site, although further site specific work would be needed. Effects on townscape and the historic environment can be addressed by design measures, but the ability to address the issue reduces as the proposed level of housing increases. Provision of new infrastructure, in particular the highways network, can mitigate negative impacts though how such proposals interact with other uses such as housing will be important.		

Question 9iv: Do you agree with meeting employment needs in new Locations									
SA Objective	Approach 1 Agree – All employment need should be met at new locations			Approach 2 Neutral - Some of the employment need should be met at new locations			Approach 3 Disagree - None of the employment need should be met at new locations		
	ST	MT	LT	ST	MT	LT	ST	MT	LT
1. To make provision for local housing needs by ensuring that everyone has the opportunity to live in a decent sustainably constructed and affordable home	-	-	-	-	-	-	-	-	-
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment by ensuring no inappropriate development in any areas at risk of flooding and use sustainable drainage solutions and other solutions in line with advice from the Environment Agency where necessary.	?	?	?	?	?	?	?	?	?
3. Safe and secure environment	?	?	?	?	?	?	?	?	?
4. To improve the health and well-being of the population.	?	?	?	?	?	?	?	?	?
5. To create and sustain vibrant and locally distinctive communities	?	?	?	?	?	?	?	?	?
6. To reduce poverty and social exclusion	✓	✓	✓ ✓	✓	✓	✓ ✓	x	x	x
7. To raise educational attainment, skills and training opportunities	✓	✓	✓ ✓	✓	✓	✓ ✓	x	x	x
8. To improve accessibility to services, amenities and facilities in particular by safe walking and cycling routes	?	?	?	?	?	?	?	?	?

Question 9iv: Do you agree with meeting employment needs in new Locations									
SA Objective	Approach 1 Agree –			Approach 2 Neutral -			Approach 3 Disagree -		
9. To reduce road congestion and pollution levels on the local and strategic road network (SRN) by improving travel facilities and choices including safe walking and cycling routes and public transport	x	x	x	x	x	x	x	x	x
10. To improve efficiency in land use through the re-use of previously developed land, existing buildings, including the re-use of resources and remediation of previously developed land	?	?	?	?	?	?	?	?	?
11. To minimise impacts arising from pollution and improve and prevent where possible	-	-	-	-	-	-	-	-	-
12. To conserve and enhance biodiversity, including wildlife and river corridors and networks and to maximise opportunities for building in beneficial features for biodiversity including limiting the impact of climate change.	?	?	?	?	?	?	?	?	?
13. To protect and enhance the countryside and historic environment	x	x	x	x	x	x	✓	✓	✓
14. To sustainably use resources (including renewable and non-renewable resources)	?	?	?	?	?	?	?	?	?
15. To address waste by: reducing and minimising waste as a priority, re-use then recycle, compost or energy recovery	?	?	?	?	?	?	?	?	?

Question 9iv: Do you agree with meeting employment needs in new Locations									
SA Objective	Approach 1 Agree –			Approach 2 Neutral -			Approach 3 Disagree -		
16. To maintain, and, where appropriate improve water quality (including groundwater and surface water) and to achieve sustainable water resource management of both surface and groundwater flows.	?	?	?	?	?	?	?	?	?
17. To maintain and where appropriate improve soil quality, and to ensure land affected by contamination is remediated to a condition suitable for use	x	x	x	x	x	x	-	-	-
18. To increase energy efficiency and the proportion of energy generated from renewable sources in the Borough	-	-	-	-	-	-	-	-	-
19. Appropriate new development makes a positive contribution or makes no material harm to the character, environment, landscape and heritage within and around the Borough	✓	✓	✓	✓	✓	✓	✓	✓	✓
20. To ensure high and stable levels of employment	✓	✓	✓ ✓	✓	✓	✓	?	?	?
21. To encourage 'smart' economic growth	✓	✓	✓ ✓	✓	✓	✓	?	?	?
22. Maintaining a buoyant and competitive economy with a range of jobs without adversely affecting the quality of life	✓	✓	✓ ✓	✓	✓	✓	?	?	?

Area	Approach 1	Approach 2	Approach 3
Likelihood - High, Medium or Low	Medium	High	Low
Scale - Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global	Local, Sub-Regional, Regional, National, Global
Permanence - Temporary or Permanent	Permanent	Permanent	Permanent

Effect - Secondary, Cumulative or Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects	Secondary, Cumulative and Synergistic effects
Commentary including positive and negative effects	Focusing all the employment need at met at new locations, provides opportunities to deliver higher quality employment and a more diverse range of jobs. However, in the short to medium term it is only going to have minor positive effects.	Focusing some of the employment need at met at new locations performs similarly to option 1 however not as positively.	Focusing none of the employment need at met at new locations creates a lot of uncertainty against all the objectives with the impact being largely unknown. It performs negatively against objectives 6 and 7.
Mitigation	Some of the effects identified above are negative, but many of these can be mitigated through the right combination of policies in the plan. Effects on flood risk and biodiversity may be capable of mitigation on site, although further site specific work would be needed. Effects on townscape and the historic environment can be addressed by design measures, but the ability to address the issue reduces as the proposed level of housing increases. Provision of new infrastructure, in particular the highways network, can mitigate negative impacts though how such proposals interact with other uses such as housing will be important.		

Next steps

Stage B (excluding B1) has been completed as part of this SA/SEA. Stage B1 of the process will be completed once the Council has undertaken this consultation on the LPU and has created a range of objectives for the Local Plan Update. The SA/SEA for the Draft Plan stage of the LPU process will enable the Council to undertake the B1 stage of the SA/SEA process and develop the reasonable alternatives considered as part of stage B2.

Table 3 shows the stages that have been undertaken for the LPU consultation and the stages that will be completed for the Draft Plan report.

Table 5 - Stage B of the SA/SEA process

Stage B: Developing and refining alternatives and assessing effects	LPU consultation <i>homes for our future</i> SA/SEA	Draft Plan SA/SEA
B1 – Test the Local Plan objectives against the sustainability appraisal framework	x	✓
B2 – Develop the Local Plan options including reasonable alternatives	✓	✓
B3 – Evaluate the likely effects of the Local Plan and alternatives	✓	✓
B4 – Consider ways of mitigating adverse effects and maximising beneficial effects	✓	✓
B5 - Propose measures to monitor the significant effects of implementing the Local Plan	✓	✓

Appendix 2

The questions set out in Table 5 below show the type of response requested

Table 6 - Consultation Questions

Number	Question
Q1	Do you support the overall approach taken to the appraisal of the questions?
Q2	Have we correctly identified the main significant effects and potential mitigation measures?
Q3	Do you wish to make a comment on the scores given to any specific option(s) for the spatial strategy?
Q4	Does this SA/SEA report of the Consultation document, together with the document, provide sufficient information at this stage to ensure that an appropriate SA can be carried out of the Local Plan?
Q5	Do you have any other comments you wish to make regarding the SA/SEA?