

# Sustainability Appraisal (SA) of the Guildford Local Plan Part 2: Development Management Policies

Interim SA Report  
Non-technical Summary

April 2020

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# Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Guildford Borough Local Plan: Development Management (DM) Policies, henceforth 'LPDMP'.

Once in place, LPDMP will supplement the recently adopted Local Plan: Strategy and Sites (2019), which deals with strategy and allocates sites for development. Specifically, LPDMP will provide further and more detailed planning policies for Guildford Borough Council ('the Council') use when making development management decisions, i.e. when determining planning applications.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Local Plans must be subject to SA.

Central to the SA process is preparation of an SA Report for publication alongside the Draft Plan. At the current time, an early draft version of the plan is published for consultation, with an 'Interim' SA Report published alongside. This report is the Non-technical Summary (NTS) of the Interim SA Report.

## Structure of the Interim SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point**?

- including in relation to 'reasonable alternatives'.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What's the scope of the SA ?*

## What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list indicates parameters appraisal and provides an appraisal 'framework'.

The SA framework is presented within the table below. Further information on the SA Scope is available within the Scoping Report (2019).

*The SA framework*

| Topic                       | Objective  |
|-----------------------------|--|
| Air quality                 | Reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure  |
| Biodiversity                | Conserve and enhance biodiversity, geodiversity and the natural environment  |
| Climate change adaptation   | Build resilience and adapt to the impacts of climate change and extreme weather events such as flood, drought and heat risks particularly on groups more vulnerable to the effects of climate change |
| Climate change mitigation   | Mitigate the causes of climate change through reducing emissions of greenhouse gases and efficient use of natural resources  |
| Digital infrastructure      | Ensure that the digital infrastructure available meets the needs of current and future generations   |
| Economy                     | Maintain Guildford borough and Guildford town's competitive economic role  |
| Education                   | Improve levels of education and skills in the population overall   |
| Employment land             | Facilitate appropriate development opportunities to meet the changing needs of the economy   |
| Flood risk                  | Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment  |
| Health                      | Facilitate improved health and well-being of the population, enabling people to stay independent and reducing inequalities in health   |
| Historic environment        | Protect, enhance, and where appropriate make accessible, the archaeological land, historic environments and cultural assets of Guildford, for the benefit of residents and visitors                  |
| Housing                     | Meet housing requirements of the whole community and provide housing of a suitable mix and type  |
| Land                        | Minimise the use of best and most versatile agricultural land and encourage the remediation of contaminated land   |
| Landscape and townscape     | Conserve and enhance the quality and local distinctiveness of landscapes and townscapes  |
| Poverty                     | Reduce poverty and social exclusion for all sectors of the community   |
| Previously developed land   | Make the best use of previously developed land (PDL) and existing buildings  |
| Rural economy               | Enhance the borough's rural economy  |
| Safe and secure communities | Create and maintain safer and more secure communities and improve the quality of where people live and work  |
| Vibrant communities         | Create and sustain vibrant communities   |
| Waste                       | Reduce waste generation and achieve the sustainable management of waste and materials  |
| Transport                   | Encourage the use of sustainable forms of transport (walking, cycling, bus, rail)  |
| Water quality               | Maintain and improve the water quality of the borough's rivers and groundwater   |
| Water resources             | Achieve sustainable water resources management and water conservation  |

# Plan-making / SA up to this point

## Overview

An important element of the required SA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the main report explains work undertaken to develop and appraise a 'reasonable' alternative policy approaches in respect of three key policy areas:

- Density -
  - Option 1 – a flexible criteria-based policy
  - Option 2 – a more prescriptive policy with minimum densities for specific areas (see Figure 5.1)
- Biodiversity net gain -
  - Option 1 – 10% mandatory biodiversity net gain
  - Option 2 – 20% mandatory biodiversity net gain
- Parking standards (residential) -
  - Option 1 – *a single minimum* standard outside of the town centre
  - Option 2 – *tapered maximum* standards outside of the town centre

## Alternatives appraisal findings

Appraisal findings in respect of these three sets of alternatives are presented across the three tables below. With regards to appraisal methodology:

Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects', using **red** (significant negative effect), **amber** (moderate or uncertain negative effect), **and green** (significant positive effect) and also rank the alternatives in order of performance, where one (also highlighted by a gold star) is best performing. Also, ' = ' is used to denote where it not possible to differentiate the alternatives with any confidence, and ' ? ' where there is too much uncertainty to reach a conclusion.

*Housing density – alternatives appraisal*

| Topic                     | Option 1 | Option 2 | Discussion   |
|---------------------------|----------|----------|--|
| Air quality               | 2        | ★1       | <p>There are a range of considerations that can assist in establishing appropriate densities for a site or a particular area, such as accessibility, character, environmental and infrastructure constraints and site viability. It follows that a flexible approach (Option 1) can potentially lead to negative impacts being avoided and opportunities realised in respect of wide ranging sustainability objectives. However, this assumes effective decision-making at the development management / planning application level, guided by clear guiding criteria. In this respect, the Strategic Development Framework Supplementary Planning Document (SPD, 2020) generates confidence given its focus on Borough-wide design principles (Part 2 of the SPD) and its presentation of detailed 'development frameworks' for each of the five strategic locations for growth within the Borough. Amongst other things, the SPD explains that: <i>"The starting point for every strategic development proposal must be a detailed observation of the strategic site and its physical context. [Such a] study will be expected to be thorough and detailed given the nature and complexities of each site. This is of key importance in gaining an understanding of place and to ensure locally distinctive and responsive designs."</i> The SPD generates confidence that decisions on density will be made taking into account: landscape context, including <i>"wider historical, social, cultural and physical"</i> dimensions; transport connectivity (<i>"Traffic levels in Guildford have an impact on the quality of everyday life for all residents and the development proposals for the strategic locations should lead the way in establishing a new benchmark for sustainable travel..."</i>); and the need to respond to biodiversity / green infrastructure constraints and opportunities (<i>"The adjacent land uses of a site must be clearly identified and accounted for... This will include.. ensuring that development positively addresses edges that comprise an area of open space, waterbody, or riverside, notably the River Wey..."</i>). The SPD also explains the important role of the Design and Access Statement (DAS) submitted as part of planning applications, which must demonstrate how design and layout has responded to existing land uses, setting and landscape context and the socio-economic context.</p> <p>A more prescriptive approach (Option 2) could lead to negative impacts in the Guildford town centre, given variations in topography and historic character, as highlighted in the recently adopted the Guildford Town Centre Views SPD, which identifies 15 important view cones. Alternatively, the localised constraints that exist within the town centre might lead to a "lowest common denominator" minimum density being set, which would run counter to the objective of maximising densities in-line with transport accessibility. Outside of the town centre, the reality is that most growth over the plan period in proximity to a transport hub (see Figure 5.1) is either already committed or a strategic allocation for which guidance on density already exists. There will be additional windfall growth in proximity to transport, but such sites are less suited to a prescriptive approach to density.</p> <p>In conclusion, it is difficult to argue against allowing for flexibility in respect of setting densities, although it is considered appropriate to flag a risk in respect of <b>air quality</b> and <b>climate change mitigation</b> as these are factors that might be taken into account more fully as part of a strategic exercise to set minimum development densities.</p> <p>With regards to effect significance, neither of the alternatives are predicted to result in significant effects in respect of any SA topic.</p> |
| Biodiversity              | ★1       | 2        |  |
| Climate change adaptation | ★1       | 2        |  |
| Climate change mitigation | 2        | ★1       |  |
| Digital infrastructure    | ★1       | 2        |  |
| Economy                   | ★1       | 2        |  |
| Education                 | ★1       | 2        |  |
| Employment land           | ★1       | 2        |  |
| Flood risk                | ★1       | 2        |  |
| Health                    | ★1       | 2        |  |
| Historic environment      | ★1       | 2        |  |
| Housing                   | ★1       | 2        |  |
| Land                      | ★1       | 2        |  |
| Landscape and townscape   | ★1       | 2        |  |
| Poverty                   | ★1       | 2        |  |
| Previously developed land | ★1       | 2        |  |
| Rural economy             | ★1       | 2        |  |
| Safe / secure communities | ★1       | 2        |  |
| Vibrant communities       | ★1       | 2        |  |
| Waste                     | ★1       | 2        |  |
| Transport                 | ★1       | 2        |  |
| Water quality             | ★1       | 2        |  |
| Water resources           | ★1       | 2        |  |

*Biodiversity net gain – alternatives appraisal*

| Topic                     | Option 1 | Option 2 | Discussion   |
|---------------------------|----------|----------|--|
| Air quality               | 2        | 1        | <p>With respect to <b>biodiversity</b>, there is a clear argument to suggest that Option 2 (20%) is preferable given rates of biodiversity loss in Surrey relative to the rest of England (largely due to high development pressure given proximity to Greater London). A requirement for 10% net gain would lead to greater uncertainty over whether BNG would, in practice, be achieved overall (at functional landscape scales). At the national scale, CIEEM argue that 10% may be within the margin of error for the valuation of habitats, and it may be too low to deliver real benefits. CIEEM has stated that they would like to see a minimum 20% net gain <i>“accompanied by clear requirements to account for the sources and likely accuracy of the data, for example distinguishing between field survey data and estimating area from online maps.”</i><sup>1</sup></p> <p>With regards to <b>wider environmental and community objectives</b>, as a first point it is important to note that the Environment Bill sets out an intention to <i>“introduce a mandatory requirement for biodiversity net gain in the planning system, to ensure that new developments enhance biodiversity and create new green spaces for local <b>communities</b> to enjoy”</i> [emphasis added]. More specifically, it is well established that mandatory biodiversity net gain, at a landscape scale delivered in the context of a LNRS, presents an opportunity to deliver wider environmental net gain(s) (ENG). The concept of ENG was introduced in the 25 Year Environment Plan (2018), which stated that the Government wants to <i>“establish strategic, flexible and locally tailored approaches that recognise the relationship between the quality of the environment and development. That will enable us to achieve measurable improvements for the environment – ‘environmental net gains’ – while ensuring economic growth and reducing costs, complexity and delays for developers.”</i> The 25 YEP did not define ENG, but the Government’s response to the consultation on mandatory BNG defined it as <i>“improving all aspects of environmental quality through a scheme or project. Achieving environmental net gain means achieving biodiversity net gain first and going further to achieve net increase in the capacity of affected natural capital to deliver ecosystem services”</i>.<sup>2</sup> In practice, it is understood that the Defra Biodiversity Metric 2.0 will be complemented by analysis using the ‘Eco-Metric’. This tool (developed by Natural England and the University of Oxford) will be used to <i>“measure the net changes in natural capital and the ecosystem services it provides as a result of land-use change or development”</i>.<sup>3</sup> It is, however, worth noting that there may not be a gain in all ecosystem services, and there may be trade-offs between services (e.g. a potential gain in pollination services at expense of food production in the case of creating wildflower grassland on agricultural land).</p> <p>In conclusion, an ambitious approach to BNG is supported in respect of the majority of objectives, although there is perhaps a degree of risk in respect of <b>housing</b> and <b>employment land</b> objectives. Risks are uncertain as current understanding is that a 20% requirement would not lead to an unacceptable financial burden on the developer. Further evidence is required to understand the scale of the risk involved.</p> <p>With regards to effect significance, it is possible to predict likely significant positive effects under Option 2 in respect of biodiversity, with other effects much more uncertain and likely to be of lower significance.</p> |
| Biodiversity              | 2        | ★1       |  |
| Climate change adaptation | 2        | ★1       |  |
| Climate change mitigation | 2        | ★1       |  |
| Digital infrastructure    | =        | =        |  |
| Economy                   | 2        | ★1       |  |
| Education                 | 2        | ★1       |  |
| Employment land           | ★1       | 2        |  |
| Flood risk                | 2        | ★1       |  |
| Health                    | 2        | ★1       |  |
| Historic environment      | 2        | ★1       |  |
| Housing                   | ★1       | 2        |  |
| Land                      | 2        | ★1       |  |
| Landscape and townscape   | 2        | ★1       |  |
| Poverty                   | 2        | ★1       |  |
| Previously developed land | =        | =        |  |
| Rural economy             | 2        | ★1       |  |
| Safe / secure communities | 2        | ★1       |  |
| Vibrant communities       | 2        | ★1       |  |
| Waste                     | =        | =        |  |
| Transport                 | 2        | ★1       |  |
| Water quality             | 2        | ★1       |  |
| Water resources           | 2        | ★1       |  |

<sup>1</sup> <https://cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf>

<sup>2</sup> <https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements>

<sup>3</sup> <https://ecosystemsknowledge.net/ecometric>

*Parking standards – alternatives appraisal*

| Topic                     | Option 1 | Option 2 | Discussion  |
|---------------------------|----------|----------|---|
| Air quality               | ★1       | 2        | <p>There are arguments for restricting car parking from a climate change mitigation perspective, and also potentially from a health perspective, which might potentially be achieved through the definition of maximum parking standards (Option 2). Specifically, restriction of parking spaces can stimulate modal shift away from use of the private car towards use of active (walking, cycling) and public (buses, trains) modes of transport. There are also arguments to suggest restricted parking can lead to more land being made available for other uses, which could lead to benefits in respect of other sustainability objectives.</p> <p>However, it is a challenge to conclude benefits with any confidence. This is because residents might respond to a restricted number of parking spaces by parking on-roads, which can also cause problems in respect of localised traffic congestion and impacts to the urban realm. Whilst it is recognised that design and enforcement (such as yellow lines) can provide mitigation, residual impacts can include:</p> <ul style="list-style-type: none"> <li>• <b>Air quality</b> – increased stop start leads to increased air pollution.</li> <li>• <b>Climate change mitigation</b> – on-road parking can pose problems for bus movements and also dissuade cyclists.</li> <li>• <b>Safe/secure communities</b> – on-road parking can be an impediment to both safe cycling and safe walking including for those with mobility challenges, e.g. wheelchair and mobility scooter users.</li> <li>• <b>Historic environment</b> – on-road parking can impact on the urban realm, potentially with implications for the setting of historic assets.</li> </ul> <p>There is also a need to consider the risk of insufficient parking serving to restrict the shift towards electric vehicles, as such vehicles require designated parking spaces with access to a charging point. This could lead to negative implications in respect of climate change mitigation and air quality, but also in terms of the economy, recognising that electric vehicle production is a potential major economic growth area.</p> <p>There is also a need to consider the risk of insufficient parking in more rural areas leading to a situation whereby residents struggle to access services and facilities and employment. Under Option 2 maximum standards would be tapered, but there might nonetheless be a risk that maximum standards prove overly restrictive in some instances, e.g. if the accessibility of a location reduces over time, perhaps because of the loss of a bus service or a local school or GP surgery closing. However, effects are mostly uncertain and likely to be relatively marginal.</p> <p>This discussion has so far served to highlight quite wide-ranging benefits associated with supporting <i>minimum</i> parking standards; however, it will be important to ensure that such standards are not set too high such that opportunities for low-car development outside of the town centre are unduly restricted. For example (and notably), it will be important not to restrict the potential to bring forward low-car developments within those parts of the Weyside Urban Village, Blackwell Farm and Gosden Hill Farm strategic allocations that are served by the Sustainable Movement Corridor (e.g. the two “high density hubs” at Gosden Hill Farm identified by the Draft SDF SPD).</p> <p>In conclusion, Option 1 is supported in respect of <b>a number of objectives</b>, including ‘transport’ on balance. However, Option 1 leads to tensions in terms of <b>land</b> and <b>flood risk</b> (due to impermeable hard-standing leading to increased surface water runoff), and there are question marks in respect of <b>climate change mitigation</b> and <b>health</b>. Significant effects are not predicted.</p> |
| Biodiversity              | =        | =        |   |
| Climate change adaptation | =        | =        |   |
| Climate change mitigation | ?        | ?        |   |
| Digital infrastructure    | =        | =        |   |
| Economy                   | =        | =        |   |
| Education                 | =        | =        |   |
| Employment land           | =        | =        |   |
| Flood risk                | 2        | ★1       |   |
| Health                    | ?        | ?        |   |
| Historic environment      | ★1       | 2        |   |
| Housing                   | =        | =        |   |
| Land                      | 2        | ★1       |   |
| Landscape and townscape   | ★1       | 2        |   |
| Poverty                   | =        | =        |   |
| Previously developed land | =        | =        |   |
| Rural economy             | ★1       | 2        |   |
| Safe / secure communities | ★1       | 2        |   |
| Vibrant communities       | =        | =        |   |
| Waste                     | =        | =        |   |
| Transport                 | ★1       | 2        |   |
| Water quality             | =        | =        |   |
| Water resources           | =        | =        |   |



## Reasons for selecting the preferred option

Section 7 of the main report presents the Council's response to the three alternatives appraisal tables and, in turn, presents the Council's reasons ('justification') for selecting a preferred option in each case.

### Housing density

The preferred option is Option 1 for the following reasons (text provided by the Council):

"The NPPF and PPG set out a range of considerations and tools that can assist in establishing appropriate densities on a site or in a particular area, such as accessibility, characterisation and design studies, environmental and infrastructure assessments and site viability. This is considered preferable to setting minimum density ranges for specific locations (the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges). To set out minimum density ranges is considered to be restrictive and complicated to ascertain and will limit the flexibility that is often needed when determining a planning application.

The Council's preferred option requires the optimal use of land by building homes at the most appropriate density. It is considered the most appropriate approach for Guildford. To apply prescriptive density ranges would restrict the flexibility to take all the site constraints and considerations into account. Sites within Guildford can often have their own challenges, such as the topography of the site, being partially within the flood plain or the impact on views which are crucial to the character and setting of the town centre. Flexibility is needed to ensure the right development can take place. Whilst seeking the optimum use of the land there also needs to be flexibility to ensure that a well-balanced range of housing can come forward to meet Guildford's housing needs.

When considering the relevant issues and options for housing density in Guildford, the Council's preferred approach is to enable well-designed housing at an appropriate density. There will be a presumption for higher density development in the Town Centre. In the Town Centre there are more limited opportunities for development, yet it is a sustainable location so housing density needs to be optimised. There will also be a presumption for higher density development on strategic sites and within 500 metres of existing or planned transport interchanges. This is because the size of strategic sites will enable thoughtfully designed higher densities, and being in close proximity to transport interchanges enables opportunities to optimise densities on sustainable sites.

The results of the assessment suggest that the preferred option provides a greater amount of guidance and flexibility specific to Guildford borough to help meet the relevant Local Plan objectives."

### Biodiversity net gain

The preferred option is Option 2 for the following reasons (text provided by the Council):

"Adopting a BNG of 20 per cent is considered more reasonable than 10 per cent given rates of biodiversity loss in Surrey. At 10 per cent there is greater uncertainty over whether BNG will be achieved overall, and the cost of increasing the BNG level from 10 to 20 per cent does not appear to be prohibitive. Adoption of the standard is subject to full plan viability testing."

### Parking standards

The preferred option is Option 1 for the following reasons (text provided by the Council):

"The preferred option takes a spatially-differentiated approach to the provision of vehicle parking for new residential developments, with the focus of restraint on Guildford town centre. In areas of the borough outside Guildford town centre, the preferred option seeks to manage and avoid potential problems of congested on-street parking in new development and overspill parking on adjacent local streets. Standards for both the minimum provision of cycle parking and electric vehicle charging facilities are the same for both options considered."

# Appraisal of the Draft Plan

Part 2 of the Interim SA Report presents an appraisal of the Draft Plan. The appraisal is presented as a series of narratives under the 'SA framework' topic headings, with each narrative leading to an overall conclusion. The overall conclusions are presented below.

## Air quality

Draft LPDMP supports the provisions of LPSS with supplementary and more detailed guidance in relation to managing air quality impacts with the aim of both avoiding and mitigating potential negative effects, particularly those arising as a result of the growth strategy proposed through LPSS. A potential tension is highlighted in respect of the proposed flexible criteria-based approach to development density, although this is highly uncertain. Overall **minor positive effects** are anticipated.

## Biodiversity

Draft LPDMP provides additional protections for biodiversity and seeks to take a proactive approach, which should support key sites and ecological connectivity and combat acute biodiversity losses across Surrey. Of particular note is the ambitious approach proposed in respect of required biodiversity net gain. Overall **significant positive effects** are anticipated.

## Climate change adaptation

The draft Plan seek to minimise the effects of overheating and increase resilience to the impacts of a changing climate, particularly for vulnerable groups. The drafted policy provisions are considered likely to lead to **minor positive effects**.

## Climate change mitigation

The additional policy provisions of LPDMP are supportive of energy efficiency and also of note are policy criteria for identifying suitable locations for medium to large-scale renewable energy development. However, there is considerable uncertainty at the current time following the recent Government consultation on options in respect of requiring that all new development meets a Future Homes Standard. There is also some uncertainty at the current time regarding the merits of the proposed approach to housing density (i.e. a flexible criteria-based approach) and residential parking standards (i.e. minimum standards outside of the town centre). As such, it is appropriate to conclude **uncertain effects** at the current stage.

## Digital infrastructure

The provisions of LPSS largely support positive effects in relation to digital infrastructure and no further direct effects are identified through LPDMP, which does not provide any further thematic policy in this respect. As a result overall **neutral effects** are anticipated.

## Economy

The additional rural development policies proposed in LPDMP support a range of appropriate land uses and types of rural business activity to maintain economic vitality in these areas. Additional policy provisions relating to design should also support town centre regeneration aims. Overall **minor positive effects** are anticipated.

## Education

The additional policy provisions of Policy ID8 seek to protect existing educational facilities and support their appropriate replacement or expansion. The policy also ensures that new educational facilities will be located to maximise accessibility. Overall **minor long-term positive effects** are anticipated.

## Employment land

Whilst the proposed policies of LPDMP do not directly allocate land for new employment development, the additional provisions of Policies E10 and E11 should help to ensure that targeted new employment land comes forward in the rural area to meet specific needs. Overall **minor positive effects** are anticipated.

## Flood risk

The additional policy provisions relating to the management of surface water should contribute to minimising flood risk, particularly in extreme weather events. A tension is highlighted in respect of the proposal to support minimum parking standards, but flood risk impacts are likely to be marginal. Overall **minor positive effects** are anticipated.

## Health

The draft Plan is recognised for a number of positive impacts in relation to health. Additional policy protections are afforded to key facilities that are conducive to health and wellbeing, including open space, and community, health and sports facilities. Further policy provisions also seek to enhance active travel networks and reduce the impacts of poor air quality on health. This is considered alongside the general approach of embedding health as a key consideration across the policy framework and broad range of policy themes. The proposed policy approach to residential parking standards (minimum standards outside of the town centre) potentially leads to a degree of tension, but this is highly uncertain. Overall **significant positive effects** are anticipated.

## Historic environment

LPDMP builds on the thematic policy of LPSS to provide greater policy protections for designated and non-designated assets, and their settings, as well as archaeological remains. The policy provisions further seek to identify opportunities to deliver positive enhancements. Overall **minor positive effects** are anticipated.

## Housing

The two additional policies proposed in relation to housing are considered should support high-quality development, and maximise the delivery of housing in the most accessible locations of the Borough. Overall **minor positive effects** are anticipated.

## Land

Given that no further growth is proposed or further policy directly relating to agricultural land, neutral effects are anticipated in relation to agricultural land resources; and proposed policy provisions support the remediation of contaminated land. A tension is highlighted in respect of the proposal to support minimum parking standards, but effects in respect of 'land' objectives are likely to be marginal. Overall **minor positive effects** are anticipated.

## Landscape and townscape

Whilst LPDMP does not propose any further policy provisions in relation to designated landscapes, it does seek to provide further detail and clarity in relation to: development density; high-quality design including in village and town centres; the public realm; the riverside; and development in key historic townscape areas; and protection of open spaces. Overall **significant positive effects** are anticipated.

## Poverty

Whilst the provisions of LPSS predominantly affect this SA objective, the proposed additional measures under Policy D12 for increased energy efficiency and a 'fabric-first' approach should support efforts to reduce levels of fuel poverty. Overall **minor positive effects** are anticipated.

## Previously developed land

It is considered overall that this SA objective is predominantly affected by the provisions and allocations of LPSS. No direct effects in relation to PDL can be concluded in implementation of LPDMP, although the policy requirements for contaminated land are noted. **Neutral effects** are predicted overall.

## Rural economy

The additional policy provisions seek to clarify the types of new buildings or changes of use of buildings and land in rural areas, which the Council would consider acceptable in principle. A range of uses are identified which provide support for the rural economy and economic vitality in these areas. Overall **minor positive effects** are anticipated.

## Safe and secure communities

Proposed policy provisions are supportive of improving the quality of local environments and hence should indirectly lead to benefits in respect of in maintaining safer and more secure communities. Overall **minor positive effects** are anticipated.

## Transport

The proposed LPDMP policy provisions are likely to deliver additional benefits in relation to transport. This includes the identification and promotion of a comprehensive and connected cycle network for the Borough and policy measures which seek both directly and indirectly to maximise densities in the most accessible location of the Borough (the town centre). The measures seek to support the use of sustainable modes of transport and as a result **minor positive effects** are anticipated overall.

## Vibrant communities

LPDMP views open space and community facilities as integral to promoting healthy, inclusive and safe communities and the support for the retention of viable community facilities, including pubs, provided through the proposed infrastructure delivery policies will be beneficial in this respect. This is considered alongside measures to improve accessibility and deliver high-quality design supportive of community vitality. As a result, **minor positive effects** are anticipated overall.

## Waste

The SA objective will be largely influenced by the directions of the Surrey Waste Plan, and LPDMP supports the objectives of the Surrey Waste Plan through the provisions of Policy D12 ensuring that major development fully considers its impact in relation to waste generation and waste management. As a result, **minor positive effects** are anticipated overall.

## Water quality

LPDMP proposes additional policy protections directly relating to maintaining and improving water quality. The additional policy provisions for suitable management of surface water are also considered for minor indirect positive effects, particularly in extreme weather events and flash flooding. As a result, **minor positive effects** are anticipated overall.

## Water resources

The policy provisions of LPDMP enhance the provisions of LPSS by providing further protection for groundwater resources and supporting enhanced water resource infrastructure provisions. On this basis, **minor positive effects** are anticipated overall in relation to water resources.

## Overall conclusions on the Draft LPDMP

LPDMP is an extension to LPSS in that it seeks to deliver a supporting policy framework for the provisions and allocations established in LPSS. LPDMP does not propose any additional growth or site allocations which significantly reduces the potential for negative effects.

Overall the LPDMP is predicted to result in wide-ranging positive effects, although these are predicted to be 'minor' other than in respect of biodiversity (given the proposed approach in respect of biodiversity net gain requirements) and health (numerous proposed policies will act cumulatively in support of good health).

The appraisal does not predict negative effects in respect of any sustainability objective; however, uncertain effects are concluded in respect of climate change mitigation objectives. There is inherent uncertainty given the Government's recent consultation on setting new national sustainable design and construction standards, and the appraisal also highlights a degree of tension resulting from the LPDMP proposed approach to housing density (flexible criteria-based) and support for minimum parking standards outside of the town centre.

Moving forward, the Council should take account of the appraisal findings presented within this section alongside responses received as part of the current consultation, when preparing the final draft 'proposed submission' version of the LPDMP. Specifically, the Council should seek to address the uncertainties highlighted in respect of climate change mitigation (also other minor 'tensions' discussed within the appraisal text) and seek to ensure that the predicted positive effects are further enhanced.

# Next Steps

## Preparation of the Proposed Submission Plan

Subsequent to consultation on the Draft Plan it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, responses to the current consultation and further appraisal work.

The SA Report will be published alongside the Proposed Submission Plan, as required by legislation. It will provide all of the information required by the SEA Regulations 2004.

## Submission and examination

Once the period for representations on the Proposed Submission Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in-light of representations received the plan can still be deemed 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.

At Examination the Inspector will consider representations before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications these will be prepared (potentially alongside SA) and then subjected to consultation (potentially with an SA Report Addendum published alongside).

Once found sound the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must published setting out, amongst other things, 'measures decided concerning monitoring'.

# Monitoring

At the current time, in-light of the assessment findings presented above in respect of the Draft Local plan, it is suggested that monitoring might focus on:

- Air quality;
- Biodiversity net gain;
- Housing densities;
- Residential parking.