

Watford Borough Council

Part 2 Local Plan-

Development Management Policies Options

Proposed 1st Consultation Version

Sustainability Appraisal Report

November 2013

Halcrow Group Limited, a CH2MHill Company,

in association with

Centre for Sustainability at TRL Limited

This page is intentionally blank

Watford Borough Council

Part 2 Local Plan-

Development Management Policies Options

Proposed 1st Consultation Version

Sustainability Appraisal Report

November 2013

Halcrow Group Limited, a CH2MHill Company,

in association with

Centre for Sustainability at TRL Limited

Halcrow Group Limited, a CH2MHill Company

Elms House 43 Brook Green London W6 7EF

Tel +44 (0)20 3479 8000

www.halcrow.com

Halcrow Group Limited has prepared this report in accordance with the instructions of their client, Three Rivers District Council, for their sole and specific use. Any other persons who use any information contained herein do so at their own risk.

© **Halcrow Group Limited 2013**

Watford Borough Council

Part 2 Local Plan-

Development Management Policies Options

Proposed 1st Consultation Version Sustainability

Appraisal Report

November 2013

Contents Amendment Record

This report has been issued and amended as follows:

Issue	Revision	Description	Date	Signed	Verified
01	00	First draft of DM options appraisal	Oct 2013	KD	RG

Contents

0	Introduction	3
0.1	<i>Background to Strategic Environmental Assessment/ Sustainability Appraisal</i>	3
0.2	<i>Part 2 Local Plan- Development Management Policies</i>	4
0.3	<i>SEA/SA Methodology</i>	6
0.4	<i>Report structure</i>	8
0.5	<i>Consultation</i>	8
0.6	<i>How the SA influenced the Development Management Policies</i>	9
0.7	<i>Geographic and Temporal Scope</i>	10
0.8	<i>Habitat Regulations Assessment</i>	10
1	Environmental & Sustainability Planning Context	12
1.1	<i>Introduction</i>	12
1.2	<i>Relationship of the Development Management Policies with other Plans and Programmes</i>	12
1.3	<i>Summary of Review of other Plans and Programmes</i>	13
1.4	<i>Current and Future Baseline Review</i>	16
2	Environmental and Sustainability Issues, Opportunities and Priorities	17
2.1	<i>Issues and Opportunities</i>	17
2.2	<i>Key Sustainability Issues</i>	17
3	SEA/SA Objectives and Framework	20
3.1	<i>Introduction</i>	20
3.2	<i>Watford Borough Council Development Management Policies SEA/SA Framework</i>	20
4	Development Management Policies Initial consultation (November-December 2013)	26
4.1	<i>Introduction</i>	26
4.2	<i>Assessment methodology</i>	26
4.3	<i>Initial Issues and Options Assessment Results</i>	27
4.4	<i>Next Stages</i>	48

Appendices

Appendix 1	Review of other policies, plans and programmes
Appendix 2	Baseline Review
Appendix 3	Detailed Assessment Matrix of 1 st Round Options
Appendix 4	Internal SA comments to first draft DM Options

Abbreviations

AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BVPI	Best Value Performance Indicator
CO	Carbon monoxide
CO ₂	Carbon dioxide
DEFRA	Department for the Environment, Food and Rural Affairs
EC	European Commission
EU	European Union
GIS	Geographical Information System
GHG	Greenhouse gas
LA	Local Authority
LDD	Local Development Document
LDF	Local Development Framework
LNR	Local Nature Reserve
LTP	Local Transport Plan
MPG	Minerals Planning Guidance
NNR	National Nature Reserve
NO _x	Nitrogen oxide
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PDL	Previously Developed Land
PM ₁₀	Particulate matter at less than 10 microns diameter
PSA	Public Service Agreement
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SO ₂	Sulphur dioxide
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest

0 Introduction

0.1 *Background to Strategic Environmental Assessment/ Sustainability Appraisal*

The new planning framework requires Local Authorities to prepare Local Plans that comprise of strategic plans, development management policies and site allocations- all of which will form material consideration to future planning applications in the Borough. Part 1 of Watford's Local Plan – the Core Strategy was adopted on 30th January 2013. The Core Strategy sets out the vision, objectives and spatial strategy for Watford borough to 2031 and forms the strategic planning context.

The Core Strategy and the remaining policies of the Watford District Plan (WDP) 2000 currently make up the development plan for Watford (along with the Hertfordshire County Council Minerals and Waste Local Plans).

Part 2 of the Local Plan will replace and update the remaining Watford District Plan 2000 policies, to support the delivery of the Core Strategy vision and objectives. Part 2 will include:

- Site allocations – to identify sites for specific types of development
- Development management policies – to guide the determination of planning applications
- Area specific policies for the town centre – to provide more detail about development appropriate for this central area

The Local Plan must be subject to both Sustainability Appraisal and Strategic Environmental Assessment under the Planning and Compulsory Purchase Act (2004) and The Environmental Assessment of Plans and Programmes Regulations (2004) which implement European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive.

Both the SA and the SEA processes help planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans through a structured assessment of the objectives and Development Management Policies against key sustainability issues.

Although the requirement to carry out both an SA and SEA is mandatory, it is possible to satisfy the requirements of both pieces of legislation through a single

appraisal process. Government guidance for undertaking SEA¹ and for SA of Development Plan Documents² in particular details how the SA and SEA should be integrated into one process. The final output of the process is a combined Sustainability Appraisal/Environmental Report which will be published alongside the plan. This report will be referred to as the SA/Environmental Report.

This report should be read alongside the Development Management Policies section of Part 2 of the Local Plan, issued to support the 1st round of consultation in November 2013.

0.1.1

Purpose of this Sustainability Report

The SEA regulations require that the sustainability appraisal results of the Draft policies shall be consulted with statutory bodies and with members of the public to obtain their views prior to adoption of the Development Management Policies. This report also appraises the realistic alternative proposals considered during the policy development stage. Further stage SA will include further appraisal of the finalised policies, such as cumulative, synergistic and secondary impacts, and a monitoring framework for all significant sustainability issues identified during the assessment.

In order to limit duplication, the Scoping stage Report of the Core Strategy SA, which contained the SA/SEA Framework has been adopted to assess the Development management policies, with further refinement to suit the policy level. New sections, not contained in the Core Strategy, but which form part of the development management policies, are being analysed through a Policies, Plans and Programme Review and baseline studies. This information, along with extracts of relevant baseline and PPP review from the Core Strategy is produced in Appendix 1 (PPP Review) and Appendix 2 (Baseline). Any updates to the baseline further to those reported at the Adoption of the Core Strategy are captured in Appendix 2.

This report will accompany the 1st consultation stage Part 2 Local Plan Report in November 2013, and will be updated in the subsequent stages up to the Adoption of the Local Plan.

0.1.2

Background to the Project

This SEA/SA is being carried out by Watford Borough Council. The Centre for Sustainability (C4S) at TRL Ltd and their project partners Halcrow Group Ltd, a CH2MHill Company, have been appointed to undertake this project.

0.2

Part 2 Local Plan- Development Management Policies

Under the New National Planning Policy Framework (2012), the Local Plans are the key to delivering sustainable development that reflects the vision and

¹ "A Practical Guide to the Strategy Environmental Assessment Directive" (ODPM, 2005)

² Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005)

aspirations of the local communities. The Local Plans comprise of Local Development Documents and planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise.

Part 1 of the Local Plan i.e., the Core Strategy sets out the overall vision for future development in the District and is the basis for subsequent Local Plans, including the Development Management Policies and Site Allocations- jointly called Part 2 Local Plan.

The Development Management Policies, which forms part of Part 2 of the Local Plan sets out the criteria against which all planning applications within the District will be considered. The Council considers that these policies will enable the delivery of the objectives and long term vision for Watford Borough Council set out in the Core Strategy which was adopted by the Council in January 2013.

Some policies under the development management policies are policies that were included in the Watford District Plan 2000, which supplement the Core Strategy. These policies have now been refined and some new policy topics have been introduced to strengthen the Council's position in supporting the Core Strategy objectives. . The following list provides details of policies that have been substantially rewritten from the Watford District Plan 2000 and includes new policy topics introduced:

- SD5 Sustainable Design (substantially rewritten)
- SD7 Renewable Energy (substantially rewritten)
- SD8 Decentralised Energy (New)
- SD9 Flood Risk (substantially rewritten)
- SD10 Drainage (New as a separate policy)
- SD11 Water Consumption (New)
- TLC3 Primary Frontages (changes to extent and restrictions on change of use)
- TLC4 Intu Shopping Centre (changes to extent and restrictions)
- TLC5 Secondary Frontage (changes to extent and restrictions)
- TLC6 A3 Hubs (New)
- TLC8 Character Areas (New)
- TLC 9 Public Realm (New)
- TLC10 Restriction of non A1 uses (relates to neighbourhood centres – options to change restrictions)
- HS5 Conversion of HMOs to Flats (new as a separate policy)
- HS10 Garden Land (stronger wording and additional reference to granny annexes)

- EMP3 Clarendon Road and Bridle Path Office Area (New)
- T6 Car Parking Standards (revised standards and zones)
- T7 Low Emission Vehicles (New – electric charging points)
- UD4 Built Heritage Conservation (additional section on Archaeology)
- GI6 Sports Hubs (New)

As much of the Core Strategy SA Scoping Report information (updated at Submission Stage in 2012) will apply to Part 2 Sustainability Appraisal process, no separate Scoping Report has been prepared; instead the Sustainability Framework has been adopted from the Core Strategy to suit the lower level Development Management Policies appraisal. The framework is presented in Table 3.1.

This SA Report has been prepared to present findings of the Draft version the Development Management Policies which includes assessment of the options/ alternatives considered during the policy development stage. This report only relates to the Development Management Policies section of Part 2 Local Plan. Reference must be made to the Site Allocations SA issued alongside in this consultation to gather findings about the Site Allocations section of Part 2 Local Plan.

Further stages will include detailed appraisal of the Development Management Policies that will be taken forward to the 2nd Stage consultation and to the Submission Stage. Future stage SA will also include monitoring framework, and discussions on cumulative, synergistic and secondary impacts of the policies on the sustainability objectives.

0.3

SEA/SA Methodology

The key stages of the SA/SEA process are broadly presented in Table 0.1.

**Table 0.1 Stages in the SA/SEA and Watford Local Plan Preparation
(Development Management Policies)**

Watford Local Plan	SA/SEA Stages	Dates
<p>1. Notify relevant bodies of the documents we intend to prepare and the subject matter (and objectives), and seek comment on what should be included (i.e. what are the main issues and options). (Reg 18)</p> <p>2. Look at evidence already gathered to address any omissions</p>	<p>Stage A: Setting the context, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> • A1: identify other relevant policies, plans and document programmes and sustainability objectives. • A2: collecting baseline information. • A3: Identifying sustainability issues and problems. • A4: Developing the SA framework. • A5: Consulting on the scope of the SA <p>(Scoping Report).</p>	<p>As the Core Strategy SA Scoping Report (February 2006, updated in June 2012) contents are wholly applicable to the DMP LDD SA, this report has been adopted for the Part 2 Local Plan process. Consultation on Local Plan Part 1 (Core Strategy) Scoping Report conducted February 2006</p>
<p>3. Taking account of 1 and 2 begin to prepare a plan, and consider whether there are any reasonable alternatives to be assessed [some relevant options already presented and assessed at CS Issues and options].</p> <p>4. Consult on draft plan</p>	<p>Stage B: Developing and refining options and assessing of effects</p> <ul style="list-style-type: none"> • B1: Testing the Local Plan objectives against the SA framework. • B2: Developing the Local Plan options. • B3: Predicting the effects of the Local Plan. • B4: Evaluating the effects of the Local Plan. • B5: Considering ways of mitigating adverse effects preferred and maximising beneficial effects. <p>B6: Proposing measures to monitor the significant effects of implementing the Local Plan.</p> <p>Stage C: Preparing the Sustainability Appraisal Report.</p> <ul style="list-style-type: none"> • C1 Preparing the SA Report. 	<p>Internal consultations, including sustainability appraisal of initial ideas of Part 2 Local Plan Development Management Policies.</p> <p>Presentation of the Initial Draft Policies for the 1st Round of Consultation (this report).</p> <p>First full Draft Policies for 2nd Round of Consultation.</p>
<p>5. Take account of above to prepare submission plan (and explain how). Formally consult (Reg 19) and then submit (Reg 22)</p>	<p>Stage D: Consulting on the plan options and SA Report.</p> <ul style="list-style-type: none"> • D1: Public participation on the submission plan and the SA Report. • D2 (i) Appraising significant changes. • D2 (ii) Appraising significant changes resulting from representations. • D3: Making decisions and providing Information. 	<p>Submission Version with the Submission Local Plan, and details.</p>
<p>6. Submission of Local Plan to Secretary of State</p>	<p>Stage E: Monitoring the significant effects of implementing the Local Plan</p> <ul style="list-style-type: none"> • E1: Finalising aims and methods for monitoring. • E2: Responding to adverse effects. 	<p>Submission of Part 2 Local Plan to the Secretary of State. Examination and Final adoption of the Development Management Policies.</p>
<p>7. Adoption – publish plan, adoption statement and SA Report.</p>	<p>Preparing the SEA Statement.² Publish SA Adoption Statement</p>	

¹This output is not required by the SEA Regulations but was produced to assist in selecting the preferred options.

²The SEA Statement is required by the SEA Regulations.

0.4

Report structure

The SEA Regulations require the Sustainability Report to clearly document findings of all stages of the SEA/SA process. The Report should show that the SEA Directive has been complied with and all components that meet these requirements should be easily identifiable. The reporting requirements and corresponding chapters contained in this report are shown below:

Chapter / Section	SEA Directive Requirement (abridged)
Chapter 2 Appendix 1	Outline of contents, main objectives of the plan, and relationship with other relevant plans and programmes
Chapters 2 & 3 Appendix 2	Environment, social and economic baseline and likely evolution of the current state without implementation of the plan/ programme; any existing environmental, social and economic problems which are relevant to the plan or programme Documenting environmental characteristics of areas likely to be significantly affected
Chapter 4 Appendix 1	Environmental protection objectives set out in national and regional policies, its relevance to the plan/ programme and the way these objectives are considered in the SA process
Chapter 5	The likely significant effects of the proposed options on the environment, including on issues such as biodiversity, water, soil, population, human health, material assets, cultural heritage, landscape and the inter-relationship between the above.
Chapter 6	Outline of reasons for selecting alternatives and documentation of difficulties encountered in the assessment
Chapter 0	Non-technical summary of information under all the above headings
Appendix 1	Plans, Policies and Programmes Review (PPP Review)
Appendix 2	Detailed baseline (reiterated from the Core Strategy, along with new topics)
Appendix 3	Detailed assessment matrix of the development management policy options
Appendix 4	Exchange of interaction between the Plan production and SA teams

Further stage chapters will include discussion on the significant effects of the proposed plan options, including synergistic, cumulative and secondary impacts; mitigation measures to offset any identified significant effect; reasons for selecting alternatives and description of monitoring arrangements proposed.

0.5

Consultation

The SEA Regulations require consultation at various stages of the SA process, as indicated in Table 0.1. The Local Plan Part 1 Core Strategy consultation was held at the end of the SA Scoping stage in 2006 (and subsequently updated prior to Adoption in January 2013). The Sustainability Framework from the Core Strategy Scoping Report has been adopted to assess Part 2 Local Plan Development Management Policies.

This Part 2 Local Plan 1st Consultation SA Report, along with the Local Plan containing Development Management Policies is now presented for consultation between November 4th 2013 and December 16th 2013 to receive responses and comments.

How the SA influenced the Development Management Policies

The advantage of running the SA process in parallel with the plan making process is that it ensures sustainability and environmental considerations are incorporated in the plan. Both the SA team and the planning team have been working in iterative fashion since development of the options. The SA team provided internal feedback on high level issues of the first draft of the Development management policy topics (June 2013), presented in Appendix 4 and further provided a round of detailed appraisal of all the options proposed (August 2013). The planning team responded to SA comments and made slight revision to some policies, which was again appraised by the SA team and results presented in this report (October 2013).

At each stage of planning, the sustainability appraisal team made recommendations regarding measures to include in the plan, such as suggestions to mitigate any negative effects predicted, or to revise policies, options or objectives of the plan to improve its sustainability quotient. Table 0.2 indicates how the SA process influenced the Core Strategy development in relation to the Development Control policies that were originally included in the Core Strategy – and which now for part of the Development Management Policies Local Development Document.

Table 0.2: SA influence in the Local Plan Part 2 (Development Management policies)

Stage	Recommendations	Changes to Policies
1) First consultation of Draft Development Management Policies (part of Part 2 Local Plan)	<ul style="list-style-type: none"> Consider including policy for electric vehicle charging point 	<ul style="list-style-type: none"> Included new policy T7
	<ul style="list-style-type: none"> Consider making specific comments on advertisements/signs within conservation areas and town centres in UD3 Built Heritage policy UD4- 	<ul style="list-style-type: none"> Included reference to conservation area plans in the planning application criteria list Alternative wording proposed re demolition of listed buildings.
	<ul style="list-style-type: none"> Consider allowing public access to enjoy the improved watercourses under SD12 Restoration of River Corridors 	<ul style="list-style-type: none"> Included text ‘wherever possible, public access to the watercourses should be provided’
	<ul style="list-style-type: none"> Guidance on the level of planting required in new projects and SPAs may be added 	<ul style="list-style-type: none"> Included text to encourage new planting and requirement to prove compliance
	<ul style="list-style-type: none"> GI5 Policy should be more explicit re protection of tree within conservation areas as well as TPO trees. 	<ul style="list-style-type: none"> Additional words added to reflect recommendation
	<ul style="list-style-type: none"> SD5 on BREEAM and CfSH Options- The more ambitious option may provide a significant challenge to developers, a combination of requirements may be considered. 	<ul style="list-style-type: none"> Consultation question added to reflect suggestion to combine requirements between the options presented. Renewable energy policy included as recommended

Stage	Recommendations	Changes to Policies
	<ul style="list-style-type: none"> SD7- consider including Renewable Energy option as a standalone policy 	
	<ul style="list-style-type: none"> EMP3- extend policy applicability to Bridle Path area Extend CHP requirement criteria to all employment areas, in addition to Clarendon Road 	<ul style="list-style-type: none"> Policy was extended to include Bridle Path and a question was added to ask about extending the approach to other employment areas. Consultation includes question about this suggested extension
	<ul style="list-style-type: none"> SD17-Air quality- strengthen policy word to secure improvements to air quality, in addition to maintaining it 	<ul style="list-style-type: none"> Policy word amended to reflect recommendation

0.7

Geographic and Temporal Scope

The spatial scope for the assessment is largely local (Watford Borough Council); however the assessment also takes into account potential regional impacts (such as Three Rivers, Hertsmere and St Albans) and national impacts, wherever appropriate.

The SA/SEA examines plans across three temporal scales (but not explicitly distinguished at this stage and will be at the Submission stage):

- Short term effects: effects expected in the next 1-10 years;
- Medium term effects: effects expected in the next 10-20 years; and
- Long term effects: effects expected in the next 20+ years (after the life of the plan)

0.8

Habitat Regulations Assessment³

A Habitat Regulations Assessment of the Core Strategy was conducted as an independent study alongside the SA/SEA, sharing information with the SA/SEA where applicable. In November 2007, a Habitat Regulations Assessment (HRA) Screening Report was prepared to comply with the UK's Habitats Regulations. Further HRA screening was undertaken as the Core Strategy was further developed.

Screening is required where a plan, alone or 'in combination' with other plans, could affect Natura 2000 Sites (Special Protection Areas for birds – SPAs, Special Areas of Conservation for habitats - SACs) following Article 6(3) of the European Habitats Directive.

The screening concluded that there will be no adverse effect on the integrity of international sites from the implementation of Watford Borough Council's Core

³ Reproduced from the Core Strategy SA Report

Strategy subject to the adoption of the avoidance and reduction measures, as outlined in the HRA and SA reports. Natural England concurred with this conclusion.

The Development Management Policies Local Plan does not introduce any policies that would affect the findings of the HRA of the Core Strategy and its conclusions therefore remain unchanged.

1 Environmental & Sustainability Planning Context

1.1 *Introduction*

According to the new National Planning Policy Framework, and the Planning and Compulsory Purchase Act (2004), a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

The Development Management Policies of Part 2 Local Plan sets out the criteria against which all planning applications within the Borough will be evaluated. Watford Borough Council considers that these policies will help achieve the objectives and long term vision set out within the Watford Adopted Core Strategy (January 2013). The policies set out the approach required to be taken whilst producing a planning application submission for future developments. The topics deal with the physical location, characteristics of the development, their contribution to achieving energy efficiency and resource protection, as well to specific topics such as parking and town and local centres development.

The Council will use the policies outlined in these documents to provide a consistent approach to the assessment of planning applications within the Borough, although each application will be assessed on their own merit and its overall contribution to a sustainable development.

This Sustainability Report covers appraisal of the Development Management Policy options.

1.2 *Relationship of the Development Management Policies with other Plans and Programmes*

The SEA Regulations state that an Environmental Report should outline:

- Relationship of the Local Development Plan (Development Management Policy) with other relevant plans and programmes; and
- The environmental protection objectives- established at international, community or Member State level- relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

To fulfil this requirement, a review of the relevant plans, policies and programmes (henceforth referred as PPP review) has been carried out to identify

environmental objectives which may provide constraints or synergies with the plan being formulated. The PPP review has covered international conventions and EU policies through to local plans and strategies. A detailed PPP review was presented in the Scoping Report and was updated at the Submission stage of the Core Strategy. In addition to adopting this review to inform the Part 2 Local Plan SA, Appendix 1 presents updated PPP review with additional policies relevant to the DM topics. Appendix 2 reiterates relevant baseline information from the Core Strategy SA, and also contains new sections to reflect topic coverage of the DM policies. A summary of the PPP review is presented in this chapter. This chapter also discusses the current state of the environment within Watford.

1.3

Summary of Review of other Plans and Programmes

Together, plans can be constraints (i.e. set formal limitations, policy contexts, requirements) or can be sources of useful background information as part of evidence gathering. These act together in a hierarchy where a sequence of precedence is established in a nesting, or tiering of plans. A review of other relevant policy documents is required to establish environmental objectives that they contain, and it allows opportunities and synergies to be identified, as well as potential conflicts between aims, objectives or detailed policies. This review also highlighted sustainability drivers relevant to the Local Plan.

At an international level various environmental policies such as Kyoto Protocol, EU Policies on greenhouse gas emissions, EU Second Climate Change Programme are to be considered. Other supra-national conventions such as Ramsar Convention and the Habitats Directive should be considered in the Local Plan in relation to protection and enhancement of biodiversity. The Water Framework Directive is a major European policy that requires its Member states to achieve ‘good ecological status’ of all natural inland water bodies and protection/ enhancements to ground waters. As a result all Member states are required to prepare River Basin Management Plans.

National planning policy has recently been condensed from a number of planning policy statements and guidance into one single National Planning Policy Framework (NPPF).

Policies in this document have relation to number of regional and local plans and policies such as the Hertfordshire Biodiversity Action Plan, Hertfordshire Local Transport Plan 3, Four Councils Level 1 Strategic Flood Risk Assessment, and various plans and strategies developed by Watford Borough Council.

Table 2.1: List of reviewed relevant policies, plans and programmes⁴

Reviewed other relevant policies, plans and programmes
International
Ramsar Convention on Wetlands of International Importance Especially as Waterfowl Habitat (1971) Bonn Convention on the Conservation of Migratory Species of Wild Animals (1979) Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979) The Convention on Biological Diversity, Rio de Janeiro (1992) Kyoto Protocol on Climate Change (1997) The UN Millennium Declaration and Millennium Development Goals (2002) World Summit on Sustainable Development - Earth Summit (2002)
European
EU Directive on the Conservation of Wild Birds (79/409/EEC) EU Waste Framework Directive (91/156/EEC) EU Nitrates Directive (91/676/EEC) EU Habitats Directive (92/43/EEC) EU Directive on Ambient Air Quality and Management (1996/62/EC) European Spatial Development Perspective (1999) EU Waste to Landfill Directive (99/31/EC) EU Directive Establishing a Framework for the Community Action in the Field of Water Policy (2000/60/EC) – The Water Framework Directive European Commission White Paper on the European Transport Policy (EC, 2001) EU Sustainable Development Strategy (2001) Åarhus Convention (2001) EU Directive to promote Electricity from Renewable Energy (2001/77/EC) Environment 2010: Our Future, Our Choice - EU Sixth Environment Action Programme (2002) EU Directive for the Promotion of Bio-fuels for Transport (2003/30/EC)
National
<i>National Planning Policy Framework (2012)</i> <i>Localism Act (2011)</i> <i>The Town and Country Planning (Local Planning) (England) Regulations 2012</i> Development and Flood Risk Practice Guide (2009) Flood and Water Management Act, 2010 (amended 2011) Wildlife and Countryside Act 1981 (as amended) UK Biodiversity Action Plan - UK BAP (1994) England Forestry Strategy (1999) UK Air Quality Strategy (2007) Countryside and Rights of Way Act – CRoW (2000) Government Urban White Paper: Our Towns, Our Cities, the Future. Delivering an urban renaissance (2000) UK Waste Strategy (2007) Government Rural White Paper: Our Countryside, the Future – A Deal for Rural England (2000) Climate Change: The UK Programme (2001) The Historic Environment: A Force for Our Future (2001) UK Fuel Poverty Strategy (2001) 'Working with the Grain of Nature': A Biodiversity Strategy for England (2002) Our Energy Future - Creating a Low Carbon Economy' - UK white paper on energy (2003) The Future of Transport – UK white paper on transport (2004) UK Climate Change Programme Review: Consultation (2004) England Rural Strategy (2004) Choosing Health: Making Healthier Choices Easier - Health White Paper (2004) Securing the Future – UK Government Sustainable Development Strategy (2005) Sustainable Communities: Building for the Future - Communities Plan (2003)

⁴ New Policies reviewed since the Core Strategy adoption are shown in bold italics

<p>Habitat Regulations Assessment (HRA) Communities and Local Government: 'Lighting in the Countryside: Towards Good Practice (1997) The Institution of Lighting Engineers: Guidance Notes for the Reduction of Obtrusive Light (2005)</p>
<p>Regional – East of England</p>
<p>The London Plan (2004) Towns and Cities – Strategy and Action Plan: Urban Renaissance in the East of England Chilterns AONB Management Strategy: The Framework for Action 2002-2007 A Housing Strategy for the London Commuter Belt Sub-Region 2005-2008</p>
<p>County - Hertfordshire</p>
<p>A 50 Year Vision for the Wildlife and Natural Habitats of Hertfordshire (1998) Hertfordshire Waste Local Plan 1995-2005 (1999) The Hertfordshire Environmental Strategy (2001) Hertfordshire Minerals Local Plan Review (2001) Rural Hertfordshire – an agenda for action (2001) Enjoy! A Cultural Strategy for Hertfordshire (2002) Hertfordshire Town Renaissance Campaign Hertfordshire Waste Strategy 2002-2024 Hertfordshire Sustainability Guide (2003) Building Futures: A Hertfordshire Guide to Promoting Sustainability in Development The Hertfordshire Minerals and Waste Development Framework and Scheme (2005) Hertfordshire Local Transport Plan 2011-2031 Draft Hertfordshire Infrastructure Investment Strategy Study, 2008 Four Councils Strategic Flood Risk Assessment, Dacorum, St. Albans, Three Rivers and Watford, 2007, updated in 2012 Strategic Housing Market Assessment (2010) London Arc Employment Land Study, 2009 Building Futures: A Hertfordshire guide to promoting sustainability in development' Climate Change Strategic Framework for Hertfordshire Colne Catchment Abstraction Management Strategy (CAMS) (2007) Thames River Basin Management Plan (2009)</p>
<p>Local Authority – Watford Borough Council</p>
<p>Watford District Plan 2000 (adopted 2003) Watford Cultural Strategy (2005) Watford Homelessness Strategy (2003, updated 2004) Watford BC Housing Strategy 2004 – 2007 Watford BC Anti Social Behaviour Policy (Dec 2004) Watford BC Consultation Strategy (November 2004) Watford's Sustainable Community Strategy 2006-26 Watford Community Safety Strategy 2005/08 Watford Strategic Housing Land Availability Assessment, 2008 updated in 2010 Watford Character of Areas Study (2011) Water Cycle Strategy (2010) Employment Market Assessment (2010) Town Centre Retail Provision- Evidence Base Technical Paper (2011) Watford Retail Study Supplementary Report (2011) Equalities and Diversity Policy Watford BC Corporate Equality Plan (April 2005) An Energy Strategy for Watford Carbon Management Strategy (draft) Greenspaces Strategy (2006), Open Spaces Study (2010), WBC Sports Facility Study (2012), Watford Borough Green Infrastructure Plan (2011) Annual Monitoring Report (2012) Infrastructure Delivery Plan (2010)</p>

Current and Future Baseline Review

A key step in the SA process is establishing current state of the environment and its likely evolution in the future without implementation of any plan.

The Core Strategy SA Baseline first issued in February 2006, and updated in 2012, reported baseline information under environmental, social and economic themes. The data was organised under the following headings – Air Quality, Biodiversity, Climatic Factors, Cultural Heritage, Landscape, Material Assets, Waste, Land use, Soil, Water, Flood risk, Social factor, Noise, Population, Housing, Crime, Accessibility, Social deprivation, Recreation, Sports and Leisure, Health, Education, Economic activity, Employment, Economic footprint, Enterprise and Innovation- most of which are directly applicable to informing the DM Sustainability Appraisal.

The baseline data provides an evidence base for identifying sustainability issues in Watford, as well as a mechanism for identifying alternative ways of dealing with them. The SEA/SA Framework was developed in the Core Strategy SA process which also provided a basis for predicting and monitoring the effects of the Core Strategy Policies. Following internal consultations, this framework is considered suitable to be adopted to predict the effects of the proposed Development Management Policies.

In order to assess how the DM Policies will contribute to sustainable development, it is essential to understand the present economic, environmental and social baseline of the Borough, and to predict how they may progress without implementation of the Plan. Prediction of future trends can be highly uncertain but key trends identified from the available baseline data, and therefore potential sustainability issues are identified and discussed in Appendix 2 (which includes iteration of Baseline information from the Core Strategy SA). Key issues and opportunities identified as part of the baseline analysis are discussed in Chapter 2.

This version of the SA reiterates the most recently updated baseline contained in the Core Strategy, but it will be updated throughout the SA production process.

2

Environmental and Sustainability Issues, Opportunities and Priorities⁵

2.1

Issues and Opportunities

The review of plans and programmes affecting the Borough, and the collation of the environmental baseline data informed the identification of a series of sustainability problems or issues that could be addressed by, or affect the strategies and measures developed in the Local Plan. Such issues, problems and opportunities have been identified through:

- Discussions with Watford Borough Council officers;
- Review of the baseline data, especially where targets are not on track to be met or trends are negative;
- Tensions/inconsistencies with other plans, programmes and sustainability objectives; and
- Consultation on the Scoping Report and scoping consultation.

2.2

Key Sustainability Issues

The sustainability issues were identified at the scoping stage, and have since been revised in light of updated baseline data. Whilst a detailed note of the issues and opportunities can be found in the Core Strategy Scoping Report, Table 2.1 presents a summary of key sustainability issues and inter-relationships between the issues, for example, between biodiversity (environment) and health (social) are discussed to provide an integrated understanding of the sustainability issues.

⁵ This chapter is reiterated from the Core Strategy SA Report, with few amendments

Table 2.1: Sustainability Issues and Opportunities at Watford

SEA Regulation Topic	Potential sustainability effects	Issues for the plan and the SA
Air Quality	<ul style="list-style-type: none"> • Congestion in the town centre is leading to poor air quality in some parts of the town (6 AQMAs had been declared in 2006 and are currently under review) • Over 80% travel into town by car • Public transport is considered as not sufficient for some areas, although Watford has the best public transport provision in the whole region (train and bus networks) • More development could lead to more traffic and worse parking conditions 	<ul style="list-style-type: none"> • Provide more sustainable modes of travel to encourage modal shift • Consider the use of park and ride. • Improve cycle and pedestrian facilities. • Aim to meet more needs locally and thereby reducing the need to travel. • Promote low emission vehicles (e.g. hybrids, LPG, CNG).
Biodiversity	<ul style="list-style-type: none"> • Being a borough, extended areas of high biodiversity are limited in Watford. 	<ul style="list-style-type: none"> • Existing designated areas and open spaces should be maintained and enhanced. • Green belt land should be protected from development pressures. • The use of previously developed land with low biodiversity value should be encouraged. • Opportunities for extending wildlife corridors should be explored.
Climatic Factors	<ul style="list-style-type: none"> • Domestic CO₂ emissions per capita are below the regional average. • However, greenhouse emissions in the UK are increasing. 	<ul style="list-style-type: none"> • Promote the use and generation of renewable energy (e.g. for new developments). • Promote higher energy efficiency. • Reduce the need to travel through integrated land use planning.
Cultural Heritage	<ul style="list-style-type: none"> • Concern that residential areas are damaged by poorly designed development. • New development could lead to erosion of the character of residential neighbourhoods. 	<ul style="list-style-type: none"> • To preserve the character of the town measures such as declaring conservation areas or issues design guides should be considered. • Create neighbourhoods with local identities.
Human Health	<ul style="list-style-type: none"> • 93.16% of Watford's population state to be in good or fairly good health. • Nevertheless, a higher than average number of working days is lost to sickness. 	<ul style="list-style-type: none"> • Promote healthier lifestyles by providing more cycle and pedestrian facilities.
Landscape/Townscape	<ul style="list-style-type: none"> • Watford is a small borough which is constrained by the surrounding Green Belt areas • The small area available is subject to many competing demands. 	<ul style="list-style-type: none"> • Maximise the use of previously developed land with low biodiversity value. • Ensure developments are in keeping with local character • River restoration could contribute to improvements of the surrounding landscape
Material Assets	<ul style="list-style-type: none"> • The percentage of household waste recycled is below the county average. • Concerns about over development. 	<ul style="list-style-type: none"> • Promote the reduction, reuse and recycling of waste. • Good design guidelines aiming to design out crime and provide a high quality built environment. • Declaration of green and home zones. • Require/promote the use of locally sourced, secondary and recycled materials. • Require promote sustainable construction methods.
Population	<ul style="list-style-type: none"> • Watford's population has been growing constantly in the past, the number of Watford's households is still increasing also as a result of smaller household sizes 	<ul style="list-style-type: none"> • This puts further pressure on housing demand and transport infrastructure. • Anticipated population and housing growth should be achieved in a sustainable manner
Soil	<ul style="list-style-type: none"> • No Watford specific data on soil is available. 	<ul style="list-style-type: none"> • Soil contamination/loss due to new developments should be avoided/minimised.

SEA Regulation Topic	Potential sustainability effects	Issues for the plan and the SA
Water	<ul style="list-style-type: none"> • Biological river quality declined between 2000 and 2006, but chemical river quality improved. • High nitrate and phosphate levels. 	<ul style="list-style-type: none"> • Improve river quality by e.g. using sustainable drainage schemes. • Reduce contaminated run off into water courses. • Restrict unsustainable water abstraction.
Housing	<ul style="list-style-type: none"> • House prices are high. • Lack of affordable housing. • 631 affordable homes per year would be needed to meet local needs. • Proposed housing growth would require significant transport and other investment. 	<ul style="list-style-type: none"> • Promote higher housing densities without compromising design or quality of life.
Crime	<ul style="list-style-type: none"> • Crime rates for violent crime have been increasing. • Drinking and clubbing culture makes many feel unsafe in the town centre at night. 	<ul style="list-style-type: none"> • In conjunction with the local constabulary encourage increased policing at night. • Encourage developments that design out crime.
Accessibility	<ul style="list-style-type: none"> • Public transport is considered as not sufficient for some areas, although Watford has the best public transport provision in the whole region (train and bus networks) 	<ul style="list-style-type: none"> • Make it possible for people and promote living without a private car. • Make sure new developments are well served by public transport. • Integrate land use and transport planning.
Social Deprivation and Disadvantaged Groups	<ul style="list-style-type: none"> • Watford is less deprived than the majority of England's lower layer super output areas, however, it is more deprived than its neighbouring authorities. 	<ul style="list-style-type: none"> • Social deprivation should be reduced by regenerating deprived areas and improving amenities
Recreation, Sport and Leisure	<ul style="list-style-type: none"> • Shortage of attractions and leisure opportunities for families. • A considerable part of Watford lacks access to public open space. 	<ul style="list-style-type: none"> • General improvements to the environment in the town centre are needed • Additional open space could be provided through the use of planning obligations to secure open space as part of larger schemes.
Health Care and Education	<ul style="list-style-type: none"> • Education, health and other facilities are not equally accessible by different modes of travel. 	<ul style="list-style-type: none"> • Ensure health and education facilities are accessible by a variety of sustainable modes of travel.
Economy and Employment	<ul style="list-style-type: none"> • Healthy employment base. 	<ul style="list-style-type: none"> • The employment base should be sustained and enhanced to meet more employment need locally.

3

SEA/SA Objectives and Framework⁶

3.1

Introduction

Current guidance on SA/SEA of development documents advocates the use of objectives in the appraisal process. This section provides an outline of the objectives, criteria and indicators, organised under a SA Framework that was used to appraise the Core Strategy Policies. This Framework has been used to appraise the Development Management Policy options. This framework includes broad sustainability objectives, criteria explaining the broader objective in a more localised manner and indicators.

In order to facilitate legibility and ease of understanding and use, the sustainability objectives, criteria and indicators have been set out in the form of an Appraisal Framework, outlined in Table 3.1. This approach is recommended in Government good practice on carrying out environmental and sustainability appraisals⁷. An explanation of the methodology for formulating the Appraisal Framework is presented below.

3.2

Watford Borough Council Development Management Policies SEA/SA Framework

The sustainability objectives outlined in the Appraisal Framework have been arranged under SEA/SA topics. The topics that have been selected relate to the same topics listed in: Annex I of Directive 2001/42/EC of the European Parliament on ‘the assessment of the effects of certain plans and programmes’ (the SEA Directive); and Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005.

The topics used are set out in the first column (Biodiversity, Water, Soil, Climatic Factors, Air, Material Assets, Cultural Heritage, Landscape, Population & Human Health, Social Factors and Economic Factors).

3.2.1

Sustainability Objectives (Column 1)

Objectives have focussed on those issues, which are directly relevant to Watford Borough Council and the scope of the Local Plan.

3.2.2

Criteria (Column 2)

Following on from the identification of objectives, a range of associated criteria and indicators were identified to provide further clarity in respect of future development directions as well as to assist in the appraisal process. They focus specifically on the items which are of direct relevance to the Local Plan.

⁶ Reiterated from the Core Strategy SA Report, with amendments

⁷ The Strategic Environmental Assessment Directive: Guidance for Planning Authorities. ODPM, October 2003

Table 3.1 SEA/SA Framework

Objective	Criteria
Biodiversity	
1. To protect, maintain and enhance biodiversity and geo-diversity at all levels, including the maintenance and enhancement of Biodiversity Action Plan habitats and species in line with local targets	To protect, maintain and enhance designated wildlife and geological sites (international, national and local) and protected species to achieve favourable condition
	To restore characteristic habitats and species, to achieve BAP targets
	To manage woodlands and other habitats of value for biodiversity in a sustainable manner and protect them against conversion to other uses
	To recognise the social/environmental value and increase access to woodlands, wildlife & geological sites and green spaces particularly near/in urban areas
	To encourage people to come into contact with, understand, and enjoy nature
Water	
2. To protect, maintain and enhance water resources (including water quality and quantity) while taking into account the impacts of climate change	To raise awareness and encourage higher water efficiency and conservation by for instance promoting water reuse in new and existing developments; promoting local water recycling initiatives and rain water harvesting structures
	To ensure water consumption does not exceed levels which can be supported by natural processes and storage systems
	To reduce the number and severity of pollution incidents
	To maintain or restore the integrity of water dependent wildlife sites in the area
3. Ensure that new developments avoid areas which are at risk from flooding and natural flood storage areas	To avoid developments in areas being at risk from fluvial, sewer or storm surges while taking into account the impacts of climate change
	To ensure that developments, which are at risk from flooding or are likely to be at risk in future due to climate change, are sufficiently adapted
	To promote properly maintained sustainable urban drainage systems to reduce flood risk and surface water run off
Soil	
4. Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments	To limit contamination/degradation/loss of soils due to development
Climatic factors	
5. Reduce the impacts of climate change, with a particular focus	To minimise greenhouse gas emissions (particularly CO ₂) for instance through more energy efficient design and reducing the need to travel

Objective	Criteria
on reducing the consumption of fossil fuels and levels of CO ₂	<p>To promote increased carbon sequestration e.g. through increases in woodland cover</p> <p>To encourage technological development to provide clean and efficient use of resources</p> <p>To adopt lifestyle changes which help to mitigate and adapt to climate change, such as promoting water and energy efficiency (through for instance higher levels of home insulation)</p> <p>To encourage positive attitudes towards renewable energy schemes (e.g., biomass and wind energy)</p>
6. Ensure that developments are capable of withstanding the effects of climate change (adaptation to climate change)	<p>To promote design measures which enable developments to withstand and accommodate the likely impacts and results of climate change (for instance through robust and weather resistant building structures)</p> <p>To develop, adopt and ensure the effective use of built development design guides tackling energy use, to provide homes and businesses with self-sufficient energy</p>
Air Quality	
7. Achieve good air quality, especially in urban areas	<p>To reduce the need to travel by car through a combination of high quality transport alternatives, particularly public transport, walking and cycling networks, but also light rail, taxi, and water</p> <p>To integrate land use and transport planning by for instance:</p> <ul style="list-style-type: none"> ▪ Promoting Green Transport Plans, including car pools, car sharing and, choice of non-fossil fuel powered vehicles, as part of new developments ▪ Ensuring services and facilities are accessible by sustainable modes of transport <p>To ensure that development proposals do not make existing air quality problems worse and where possible improve the quality</p> <p>To address existing or potential air quality problems</p>
Material Assets	
8. Maximise the use of previously developed land and buildings, and the efficient use of land	<p>To concentrate new developments on previously developed land (PDL)</p> <p>To avoid use of Greenfield sites for development</p> <p>To maximise the efficient use of land and existing buildings by measures such as higher densities and mixed use developments</p> <p>To encourage the remediation of contaminated and derelict land and buildings</p>
9. To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	<p>To encourage maximum efficiency and appropriate use of materials, particularly from local and regional sources</p> <p>To require new developments to incorporate renewable, secondary, or sustainably sourced local materials in buildings and infrastructure</p> <p>To promote renewable energy sources as part of new or refurbished developments (linked to Climatic Factors SA Objective)</p> <p>To increase recycling and composting rates and encourage easily accessible recycling systems as part of new developments</p> <p>To encourage new developments to incorporate renewable and</p>

Objective	Criteria
	recycled materials in buildings and infrastructure, or materials of lower environmental impact or locally sourced materials where possible.
	To promote awareness regarding waste/recycling and renewable energy issues through education programmes in schools and the community
Cultural Heritage	
10. To identify, maintain and enhance the historic environment and cultural assets	To safeguard and enhance the historic environment and restore historic character where appropriate, based on sound historical evidence
	To promote local distinctiveness by maintaining and restoring historic buildings and areas, encouraging the re-use of valued buildings and thoughtful high quality design in housing and mixed use developments – to a density which respects the local context and townscape character, and includes enhancement of the public realm
	To promote public education, enjoyment and access of the built heritage and archaeology
Landscape and Townscape	
11. To conserve and enhance landscape and townscape character and encourage local distinctiveness	To protect and enhance landscape and townscape character
	To evaluate the sensitivity of the landscape to new/inappropriate developments and avoid inappropriate developments in these areas
	To protect ‘dark skies’ from light pollution, and promote low energy and less invasive lighting sources while considering the balance between safety and environmental impacts
	To minimise the visual impact of new developments
Population and Human Health	
12. To encourage healthier lifestyles and reduce adverse health impacts of new developments	To promote the health advantages of walking and cycling and community based activities
	To identify, protect and enhance open spaces, such as rivers and canals, parks and gardens, allotments and playing fields, and the links between them, for the benefit of people and wildlife
	To include specific design and amenity policies to minimise noise and odour pollution, particularly in residential areas
	To narrow the income gap between the poorest and wealthiest parts of the area and to reduce health differential To improve the quality and quantity of publicly accessible open space. To include specific design measures to minimise noise and odour pollution, particularly in residences
13. To deliver more sustainable patterns of location of development	To reduce the need to travel through closer integration of housing, jobs and services
	To promote better and more sustainable access to health facilities
Social Factors	
14. Promote equity & address social exclusion by closing the gap between the poorest	To include measures which will improve everyone’s access to high quality health, education, recreation, community facilities and public transport

Objective	Criteria
communities and the rest	To ensure facilities and services are accessible by people with disabilities and minority groups
	To encourage people to access the learning and skills they need for high quality of life
	To ensure that the LDD does not discriminate on the basis of disability, ethnic minority, or gender.
	To encourage development of sporting and leisure opportunities
	To encourage businesses to access learning and skills for prosperity To give greater focus to learning and skills in regeneration areas
15. Ensure that everyone has access to good quality housing that meets their needs	Promote a range housing types and tenure, including high quality affordable and key worker housing To improve the provision and condition of affordable housing.
16. Enhance community identity and participation	To recognise the value of the multi-cultural/faith diversity of the peoples in the region
	To improve the quality of life in urban areas by making them more attractive places in which to live and work, and to visit
	To encourage high quality design in new developments, including mixed uses, to create local identity and encourage a sense of community pride
17. Reduce both crime and fear of crime	To reduce all levels of crime with particular focus on violent, drug related, environmental and racially motivated crime
	To plan new developments to help reducing crime and fear of crime through thoughtful design of the physical environment, and by promoting well-used streets and public spaces
	To support government-sponsored crime/safety initiatives, maximising the use of all tools available to police, local authorities and other agencies to tackle anti-social behaviour
	To encourage design that will prevent environmental crime
Economic Factors	
18. Achieve sustainable levels of prosperity and economic growth	To support an economy in the Authority which draws on the knowledge base, creativity and enterprise of its people.
	To promote and support economic diversity, small and medium sized enterprises and community-based enterprises
	To support the economy with high quality infrastructure and a high quality environment
	To support the development of micro-businesses, community economic development and local investment
19. Achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region	To encourage local provision of and access to jobs and services
	To complete the telecom links where there are network gaps
20. Revitalise town centres to	To promote the role of local centres as centres for sustainable

Objective	Criteria
promote a return to sustainable urban living	development providing services, housing and employment, drawing on the principles of urban renaissance
	To encourage well-designed mixed-use developments in the heart of urban areas, create viable and attractive town centres that have vitality and life, and discourage out-of-town developments
	To encourage complementary hierarchy of retail centres and to promote cohesive economic development

4 Development Management Policies Initial consultation (November-December 2013)

4.1

Introduction

Following adoption of the Core Strategy in January 2013, Watford Borough Council are progressing Part 2 of the Local Plan which contains policies that will direct development in the Borough, as well as identify and allocate sites to deliver the housing, employment, retail and social amenity aspirations documented in the Core Strategy. The Development Management Policies section of the Local Plan are at the initial stage i.e., identifying policy approaches and alternatives for consultation and sustainability appraisal. In accordance with Regs 18, Watford Borough Council requested stakeholders, including members of the public to identify topics and issues that must be addressed through development management policies, in November 2012. Further to this initial consultation, a series of policy chapters, identifying both the proposed policy and alternative options have now been put forward for consultation. In order to make an informed decision about choosing the right option and to comply with the SEA and SA Requirements, the options and their alternatives are being appraised using the SEA/SA Framework (Table 3.1). The appraisal methodology is similar to that for the Core Strategy Issues and Options Appraisal and is at a level sufficient to provide a comparative analysis between the options. A commentary along with the assessment results is provided in Appendix 3. This section discusses key results of the Options appraisal.

4.2

Assessment methodology

Assessment of the Development Management Policies Options- a key task of this stage of the SA, involves prediction of the effects of each DM policy option against each of the sustainability objectives to provide a comparative picture of the options in terms of their sustainability performance. The assessment is expressed using the significance criteria outlined below.

Figure 4.1 Assessment significance criteria

Symbol	Description
✓✓	Very sustainable - Option is likely to contribute significantly to the SA/SEA objective
✓	Sustainable - Option is likely to contribute in some way to the SA/SEA objective
-	Neutral – Option is unlikely to impact on the SA/SEA objective
?	Uncertain – It is uncertain how or if the Option impacts on the SA/SEA objective
x	Unsustainable – Option is likely to have minor adverse impacts on the SA/SEA objective
xx	Very unsustainable – Option is likely to have significant adverse impacts on the SA/SEA objective

The effects are assessed in terms of geographic and temporal scale, permanence of effect and likelihood of occurrence.

Geographic scale relates to predicting effects that will have an effect at a national, regional or local level.

Temporal scale relates to effects that are likely to be in the short term (0-10 years); medium term (10 -20 years) and long term (over 20 years).

Permanence criteria - Temporary or Permanent

Likelihood of occurrence – high, medium or low.

While the above principles have been taken into consideration within the appraisal, at the alternatives options appraisal stage a detailed account of the geographic and temporal significance has not been provided. Similarly, while the significance of the effect, and to an extent the cumulative effect of the policy options have been considered at this stage, a detailed note on the cumulative, synergistic and secondary effects will be written for the preferred option that will be taken forward in the subsequent stages.

4.3

Initial Issues and Options Assessment Results

This section briefly discusses the appraisal results of the proposed policies, along with performance of alternatives considered. Table 4.2 provides a summary of the assessment results. Reference must be made to Appendix 3 for a commentary on reasoning behind rating allocation, and on recommendations for policy improvements, if applicable.

Table 4.2 Part 2 Local Plan- Development Management Policy Options Sustainability Appraisal Summary Matrix.

SEA/SA Topic	1. Biodiversity	2. Water resources	3. Flood risk	4. Soil	5. Climate change impact reduction	6. Adaptation to climate change	7. Air quality	8. Maximise use of PDL	9. Resources (and material) efficiency	10. Historic environment and cultural assets	11. Landscape and townscape character	12. Population and human health	13. Sustainable patterns of development	14. Equity & Social inclusion	15. Access to good quality housing	16. Community identity and participation	17. Reduce crime (actual and perceived)	18. Prosperity and economic growth	19. Equity and accessibility to services	20. Revitalise town centres
Sustainable Design SD5																				
Option 1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	-	-	✓	✓	-	✓	-
Option 2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	-	-	✓	✓	✓	✓	-
Option 3	-	-	-	-	✓	✓	✓	-	✓	-	-	-	-	-	-	-	-	-	-	-
Option 4	✓	✓	✓	✓	✓	✓	-	✓	✓	-	-	✓	-	-	-	-	-	-	-	-
Sustainability Statement SD6																				
Option 1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Renewable Energy SD 7																				

SEA/SA Topic	1. Biodiversity	2. Water resources	3. Flood risk	4. Soil	5. Climate change impact reduction	6. Adaptation to climate change	7. Air quality	8. Maximise use of PDL	9. Resources (and material) efficiency	10. Historic environment and cultural assets	11. Landscape and townscape character	12. Population and human health	13. Sustainable patterns of development	14. Equity & Social inclusion	15. Access to good quality housing	16. Community identity and participation	17. Reduce crime (actual and perceived)	18. Prosperity and economic growth	19. Equity and accessibility to services	20. Revitalise town centres
Option 1 (SD7)	-	-	-	-	✓	✓	✓	-	✓	-	-	-	-	-	-	-	-	-	-	-
Option 2	-	-	-	-	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Decentralised energy SD8																				
Option 1 (SD8)	-	-	-	-	✓	✓	✓	-	✓	-	-	-	-	-	-	-	-	✓	-	-
Flood Risk SD9																				
Option 1: No policy	x	x	x	-	-	-	-	-	-	-	-	x	-	-	-	-	-	-	-	-
Option 2- No development on FZ3	✓	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Option 3- Policy SD9	✓	✓	✓	-	-	-	-	-	?	?	✓	-	-	-	-	-	-	✓	-	✓
SD10 Drainage																				
Option 1- Do-nothing	-	?	-	-	-	-	-	-	-	-	-	x	-	-	-	-	-	-	-	-
Option 2- Policy SD10	✓	✓	✓	✓	✓	-	-	-	-	-	-	✓	-	-	-	-	-	✓	-	✓
SD11 Water Consumption																				
Option 1- Do-nothing	-	x	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Option 2-BREEAM & CFSH	?	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Option 3- Core Strategy SD2	?	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Option 4- Policy SD11	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SD12 Protection and Restoration of River Corridors, Canals and Watercourses																				
Option 1- Do-nothing	x	x	x	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Option 2- Policy SD12	✓	✓	✓	-	-	-	-	-	-	-	✓	✓	-	-	-	-	-	-	-	-
SD13 Groundwater Protection																				
Option 1: Policy SD13	✓	✓	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-
Option 2: No policy	-	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SD14 Waste Management																				
Option 1- Draft Policy 1 (SD14)	-	?	-	-	✓	-	-	-	✓	-	-	-	-	-	-	-	-	-	-	-
SD15 Unstable, Contaminated and Potentially Contaminated Land																				
Option 1: Draft policy SD15	✓	?	-	✓	-	-	-	✓	-	-	-	✓	-	-	-	-	-	-	✓	-
Option 2 – No Policy	-	?	-	✓	-	-	-	✓	-	-	-	✓	-	-	-	-	-	-	✓	-
SD16 Potentially Hazardous or Polluting Development																				
Option 1– No Policy	x	x	-	x	-	-	-	-	-	-	-	x	-	-	-	-	-	-	-	-
Option 2 Draft policy SD16	?	?	-	✓	-	-	-	-	-	-	-	?	-	-	-	-	-	-	-	-
SD17 Air Quality																				
Option 1- Draft Policy SD17	✓	-	-	-	✓	-	✓	-	-	✓	-	✓	-	-	-	-	-	-	-	✓
Option 2-No policy	x	-	-	-	x	-	x	-	x	-	x	-	-	-	-	-	-	-	-	x

SEA/SA Topic	1. Biodiversity	2. Water resources	3. Flood risk	4. Soil	5. Climate change impact reduction	6. Adaptation to climate change	7. Air quality	8. Maximise use of PDL	9. Resources (and material) efficiency	10. Historic environment and cultural assets	11. Landscape and townscape character	12. Population and human health	13. Sustainable patterns of development	14. Equity & Social inclusion	15. Access to good quality housing	16. Community identity and participation	17. Reduce crime (actual and perceived)	18. Prosperity and economic growth	19. Equity and accessibility to services	20. Revitalise town centres
SD18 Noise Protection																				
Option 1: Draft Policy SD18	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-
Option 2 – Former PPS24	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-
SD19 External Lighting																				
Option 1: Draft Policy SD19	✓	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	✓	-	-	-
Option 2 – no policy	✓	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	-	-	-	-
TLC 3 Primary Frontage																				
Option 1:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
Option 2 (TLC 3):	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
TLC4 Intu Shopping Centres																				
Option 1:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
Option 2:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
TLC5 Secondary Frontage																				
Option 1:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓	✓
Option 2:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓	?
TLC6 A3 Hubs																				
Option 1:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	✓
Option 2:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TLC 7 Control of Nuisance																				
Option 1 (TLC7):	-	-	-	-	-	-	?	-	-	-	-	✓	-	-	-	-	✓	-	-	-
Option 2:	-	-	-	-	-	-	✓	-	-	-	-	✓	-	-	-	-	✓	-	-	-
TLC 8 Character Areas																				
ii) Cultural Area: - The Parade and Colosseum/Palace Theatre																				
Option 1:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	✓
Option 2:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	✓
Option 3:	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	?	-	-	-	-	✓
iii) Commercial Area																				
Option 1:	-	-	-	-	-	-	-	-	-	-	x	-	-	-	-	-	-	-	-	-
Option 2:	-	-	-	-	-	-	-	-	-	-	?	-	-	-	?	-	✓	-	-	✓
Option 3:	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	✓	-	-	✓
iv) Queens Road and Market Street Specialist/Local Shopping Areas																				
Option 1:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓
Option 2:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	-	✓
Option 3:	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	✓	-	✓	-	-	✓
v) Lower High Street King Street to Ring Road																				
Option 1:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓

SEA/SA Topic	1. Biodiversity	2. Water resources	3. Flood risk	4. Soil	5. Climate change impact reduction	6. Adaptation to climate change	7. Air quality	8. Maximise use of PDL	9. Resources (and material) efficiency	10. Historic environment and cultural assets	11. Landscape and townscape character	12. Population and human health	13. Sustainable patterns of development	14. Equity & Social inclusion	15. Access to good quality housing	16. Community identity and participation	17. Reduce crime (actual and perceived)	18. Prosperity and economic growth	19. Equity and accessibility to services	20. Revitalise town centres
Option 2:	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	✓	-	✓	✓
Option 3:	-	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	-	-	-	-	✓
TLC9 Public Realm																				
Option 1 (TLC9)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	✓
TLC10 Restriction of Non A1 Uses																				
District Centre																				
Option 1:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
Option 2:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
Option 3:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
Neighbourhood Centres																				
Option 1:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
Option 2:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
Option 3:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
Local Shops																				
Option 1:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-
Option 2:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-
Option 3:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-
TLC11 Community Facilities																				
Option 1:	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	✓	-	-	-	-	-
Option 2:	-	-	-	-	-	-	-	-	-	-	-	-	-	-	x	-	-	-	-	-
HS5 Conversion of HMOs to Flats																				
Option 1- Draft Policy HS5	-	?	-	-	-	-	?	✓	-	-	✓	-	-	✓	-	-	-	-	-	-
HS 6 Conversion to HMOs																				
Option 1- Draft Policy HS6	?	x	-	-	-	-	-	✓	-	✓	-	-	✓	-	✓	-	-	-	?	-
Option 2-Article 4	?	x	-	-	-	-	x	✓	-	-	-	-	✓	-	✓	-	-	-	?	-
HS7 Conversions and Extensions																				
Option 1- Draft Policy HS7	-	-	-	-	-	-	x	✓	-	?	?	✓	✓	-	✓	-	-	-	✓	-
Option 2-Area restriction for Conversion	-	-	-	-	-	-	x	✓	-	?	?	✓	✓	-	✓	-	-	-	-	-

SEA/SA Topic	1. Biodiversity	2. Water resources	3. Flood risk	4. Soil	5. Climate change impact reduction	6. Adaptation to climate change	7. Air quality	8. Maximise use of PDL	9. Resources (and material) efficiency	10. Historic environment and cultural assets	11. Landscape and townscape character	12. Population and human health	13. Sustainable patterns of development	14. Equity & Social inclusion	15. Access to good quality housing	16. Community identity and participation	17. Reduce crime (actual and perceived)	18. Prosperity and economic growth	19. Equity and accessibility to services	20. Revitalise town centres
Option 3-Min. floor space defined	-	-	-	-	-	x	✓	-	?	-	-	-	✓	-	✓	-	-	-	-	-
HS8 Non-residential proposals in residential areas																				
Option 1- Policy HS8	-	-	-	-	-	✓	✓	-	✓	✓	-	✓	-	-	-	-	✓	-	-	-
Policy HS9 Retention of Affordable Housing Provision																				
Option 1- Policy HS9	-	-	-	-	-	-	-	-	-	-	-	-	✓	?	-	-	✓	-	-	-
HS10 Garden Development																				
Option 1	x	✓	✓	x	-	x	-	-	✓	✓	-	-	-	-	?	-	-	-	-	-
Option 2	✓	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Option 3 (HS10)	✓	✓	✓	x	-	x	-	-	✓	✓	-	-	-	-	?	-	-	-	-	-
EMP3 Clarendon Road and Bridle Path Office Area																				
Option 2: Core Strategy Policies only	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-	-	✓	✓	-	-
Option 6: Employment Policy 2 (EMP3)	-	-	-	-	✓	-	✓	-	-	-	-	✓	-	-	-	-	✓	✓	✓	✓
T6 Car Parking Standards																				
Option 1: WDP 2000 standards	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-
Option 2: More restrictive standards	-	-	-	-	✓	-	✓	-	-	-	-	?	-	?	-	-	x	?	?	-
Option 3: Less restrictive standards	-	-	x	-	x	-	x	-	-	-	?	x	-	x	-	-	?	-	-	-
Option 4: No parking standards	-	-	x	-	x	-	x	-	-	-	-	x	-	x	-	-	?	-	-	-
Option 5: New DM policies (T6)	-	-	-	-	?	-	?	-	-	-	-	✓	-	✓	-	-	✓	-	-	-
T7 Electric Charging Points/ Low Emission Vehicles																				
Option 1: Do-nothing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Option 5: New DM policy (T7)	-	-	-	-	?	-	✓	-	-	-	-	-	-	-	-	-	✓	-	-	-
T8 Cycle Parking Provision																				
Option 1: New policy (T8)	-	-	-	-	✓	-	✓	-	-	-	-	✓	-	-	-	-	-	-	-	-
Option 2: Increased cycle parking standards	-	-	-	-	✓	-	✓	-	-	-	-	✓	-	-	-	-	-	-	-	?
Option 3: Decreased cycle parking standards	-	-	-	-	x	-	x	-	-	-	-	x	-	-	-	-	-	-	-	-
Option 4: No cycle parking standards	-	-	-	-	x	-	x	-	-	-	-	x	-	-	-	-	-	-	-	-
T9 Access and Servicing Option 1	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-
UD3 Shop fronts and Advertisement signs																				
Option 1- Draft Policy UD3	-	-	-	-	-	-	-	-	✓	✓	-	-	-	-	-	-	-	-	-	✓

SEA/SA Topic	1. Biodiversity	2. Water resources	3. Flood risk	4. Soil	5. Climate change impact reduction	6. Adaptation to climate change	7. Air quality	8. Maximise use of PDL	9. Resources (and material) efficiency	10. Historic environment and cultural assets	11. Landscape and townscape character	12. Population and human health	13. Sustainable patterns of development	14. Equity & Social inclusion	15. Access to good quality housing	16. Community identity and participation	17. Reduce crime (actual and perceived)	18. Prosperity and economic growth	19. Equity and accessibility to services	20. Revitalise town centres
Option 2- No policy	-	-	-	-	-	-	-	-	-	X	X	-	-	-	-	-	-	-	-	X
UD 4 Built Heritage																				
Option 1- Draft Policy UD4	✓	-	-	-	-	-	-	-	-	✓	✓	✓	-	-	-	-	-	-	-	✓
Option 2- No policy	-	-	-	-	-	-	-	-	-	✓	-	✓	-	-	-	-	-	-	-	-
GI5 Trees, woodlands and hedgerows																				
Option 1- Draft Policy 1	✓	-	✓	✓	✓	-	✓	-	-	-	✓	✓	-	-	-	-	-	-	-	-
GI6 Sports Hubs																				
Option 1- Sports hub	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	-	-	-	-	-
GI7- Open Space and Play Area																				
Option 1- Open space	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	-	-	-	-	-	-

4.3.1 SD 5 Sustainable Design

Of the four options the first two relate to setting the Code for Sustainable Homes and BREEAM rating standards for residential and non-residential buildings, both within and outside the Special Policy Area. The assessment finds that both options perform well against most environmental and social objectives. Option 2, that sets highest standards, is likely to generate a significant positive effect against environmental and social factors, but considering current practice and typical reaction from the developers that the stringent standards will add to the cost, there are some doubts about the level of interest developers will have on investing in the area if this option is taken forward.

Option 3 (renewable energy generation) scores well against environmental objectives such as climate change impact reduction, air quality and resource efficiency. It is to note that subsequent to the first round of internal SA, where it was recommended to bring the option as a policy rather than one of four options, a separate renewables policy SD 7 has been developed.

Option 4 reiterates Core Strategy sustainable development policy - while this option will, at a high level, support social, environmental and economic factors relating to a development, by comparison to other options it lacks details relating to individual developments and thus may miss out on fully supporting cultural heritage, townscape and air quality objectives.

In general the assessment concludes that the policy options still do not address issues relating to embodied carbon (construction materials).

4.3.2

SD6 Sustainability Statement

The policy option covers a procedural requirement, for which the actions would generate from implementation of SD5 and other development management policies. Although supportive of driving developers to provide evidence on incorporating some sustainability features in the project from a SA perspective no significant effect is predicted against the SA objectives.

4.3.3

SD7 Renewable energy generation

Option 1, which is also the preferred option, is the same as Option 3 under SD5. As indicated above it will support the climate change, material efficiency and air quality objectives. In a do-nothing scenario (Option 2), except the uncertain effect predicted under the climate change impact reduction, the option is unlikely to contribute to achieving any sustainability objective. Dependent on the take up at a national level on nuclear energy, and/ or individual property owner opting to buy renewable energy the contribution towards reducing the impact of climate change will vary- positive or negative. For this reason, the contribution of a do-nothing option on this objective is unknown.

4.3.4

SD8 Decentralised energy

One option is considered for this section, and the proposed policy option is forward thinking, both in terms of reducing the impact of climate change by implementing it through major developments, as well as encouraging smaller developments to make allowance for plugging into the networks when the system becomes widely available. Thus it supports flexibility and adaptation to climate change effects. Other benefits include air quality and material efficiency improvement. In terms of economic benefit, by requiring developments to think about district networks, there is a potential for the Borough to harness skills in this sector and train local workforce in this emerging area and create job opportunities.

4.3.5

SD9 Flood Risk

Of the three options, the proposed approach under Option 3 i.e., strict control over development on a flood plain or within a flood zone is found to be supportive of economic and social objectives, by helping provision of space to meet the housing and commercial demand. As for Option 3, Option 2, which precludes development within a flood zone, is equally supportive of biodiversity, water resource and flood risk objectives.

There is uncertainty over how Option 3 will support townscape character and cultural heritage assets (setting more than the asset themselves) because it is not clear how the physical features of the new developments that are required to provide resilience and resistance to flooding incorporate design features that will

complement the local setting. The assessment recommends that the proposed approach in Option 3 should place emphasis on the creative use of landscape and design as an integral part of flood risk management.

Option 1, which a do-nothing option will have negative impact on the flood risk and climate change related objectives. It will also add to the stress of the local population (by not acting to mitigate the risk from new build)- thus affecting the health objective.

4.3.6

SD10 Drainage

Option 1, which is a do-nothing option will not limit occurrence of localised flooding from increased surface water run-off – thus affecting health of local residents. In the absence of a structured draining process, surface run-off may collect pollutants on its way to the nearest water body- potentially affecting quality of water. However this effect will not be uniform across the Borough and will be location specific.

Option 2, which is the preferred option, requires the incorporation of SUDS and biodiversity enhancements- thus is supportive of biodiversity objective, and of water resources (through limiting pollution from surface water run-off and potentially protecting ground water vulnerable sites). The option may help reduce erosion of top soil and will indeed support flood risk objectives. Reducing run-off (attenuation) will indirectly reduce occurrence of localised flash flooding thus relieving stress of local residents, therefore supporting the health objective.

Option 2 may help reduce disruption to retail and commercial services and access to these services by reducing the risk of pluvial flooding, thus supporting the economic growth objective.

4.3.7

SD11 Water Consumption

Four options are proposed under this topic, Option 1 (do-nothing), Option 2 (adopt Core Strategy SD2), Option 3 (BREEAM and CfSH standards) and Option 4, proposed approach (to promote water efficiency, water resources protection and biodiversity enhancements).

Option 4 clearly supports water efficiency (during consumption) and water resources protection, therefore predicted to bring significant positive effect against the water objective. In addition, this option explicitly requires future developments to look into an integrated solution to both enhance biodiversity and help enhance water efficiency, therefore supporting the biodiversity objective.

Options 2 and 3, will require developers incorporate water efficiency measures within their development, thus supporting the SA objective. Dependent on which BREEAM/CfSH credits to focus, developers may or may not incorporate habitat enhancements linked to water resources therefore the effect under the biodiversity objective is uncertain.

Under Option 1, in a do-nothing scenario, without any appropriate measure to control water consumption and on ground water abstraction, the water objective cannot be achieved.

4.3.8

SD12 Protection and Restoration of River Corridors, Canals and Watercourses

A do-nothing option (Option 1) may have a negative effect on the water bodies (by not preventing pollution), and therefore on aquatic habitats (biodiversity) and on flood risk (without any buffer requirement for new developments).

The proposed policy (Option 2) is predicted to support environmental objectives relating to water and flood risk. As the option places emphasis on habitat creation, enhancement and protection, it is regarded to significantly contribute to achieving the biodiversity objective. Over time, with more developments along the water courses contributing to habitat creation, a blue corridor may be created in the medium to the long term bringing significant positive effect on biodiversity features. With the increased and cumulative contributions from new developments to the creation of habitats and improvements along the water courses, it is likely that the local distinctiveness and landscape character of developments along the water courses be improved in the medium to the long term. Residents who will have access to these corridors may benefit from the visual amenity, as well as use to conduct physical exercise (supporting the health objective).

4.3.9

SD13 Groundwater Protection

The proposed policy option (Option 1) will help protect ground water sources from pollution and will help maintain local water resource. In addition, indirect benefits to water dependent species and habitats (from ground water protection) is likely- supporting the biodiversity objective. In general reduced pollution could improve quality of surface water bodies (secondary effect), therefore bring health benefits (visual amenity and recreation benefits).

In a do-nothing scenario, national guidance will apply, particularly at contaminated sites where construction practice should comply with the Environment Agency requirement of conducting risk assessments to ground water; therefore at contaminated sites, the option could support the water objective.

4.3.10

SD14 Waste Management

As the Watford District Plan 2000 already includes a Waste policy, and national guidance on waste management in large projects exist, a do-nothing scenario cannot be assigned. One option (preferred approach) has been presented. The option will support the resource efficiency objective. Site Waste Management Plans, may include options to reduce carbon emissions, through material re-use

and better material transport (reduced vehicle emissions)- thus support the climate change reduction objective.

The assessment recommended consideration to providing specific guidance on handling waste in small scale projects (which will be missed out by the SWMP requirement) that may involve biodiversity such as protected species (during excavation) or management of invasive species at the site. .

The assessment also notes that the policy is focused on waste collection, but the assessment recommends that waste minimisation a topic should be considered either as part of this policy chapter, or within the sustainable development policy set.

4.3.11 *SD15 Unstable, Contaminated and Potentially Contaminated Land*

The preferred option (Option 1) is a refined version of the already existing Watford District Plan 2000 policy. In a no policy scenario (Option 2), the national policies will apply and a do-nothing scenario cannot be assigned.

Both options will result in remediating contaminated land, thus limiting risk to potential human receptors (health objective), maximising the use of previously developed land (PDL) and in reducing environmental injustice (equity objective) for residents who will occupy these sites.

Option 1 is further found to support the biodiversity objective and significantly contributing to achieving the soil objective as it will help to both contain transfer of contamination as well as remediate soil, whereas Option 2 will have a minor positive impact for helping remediate soil.

Performance of both options in its contribution to the water objective cannot be determined as both options will apply to sites with a history of contamination. Whereas there may be site with no contamination history but with weak geology and within a ground water protection zone (SPZ). At these sites, without

For developments on sites with contamination history, both options will apply, but at sites that are not contaminated but within a SPZ the water quality the policy may not apply. This implies the ground water source may not be protected- therefore uncertain effect on water objective.

4.3.12 *SD 16 Potentially Hazardous or Polluting Development*

Option 2 (preferred approach) requires potentially polluting development to demonstrate consideration and mitigation of all risk to both environmental and human receptors. This implies potential positive effect on biodiversity, water, soil and human health objectives. It is assumed that the risk assessment the Council will seek will include both direct risks to human and biodiversity receptors in the

catchment area and indirect wider consequences such as potential impact on property, livelihoods and amenities.

Although the Council may have emergency preparedness plan in place, the assessment considers that there may be risks unknown at the point in time of application, therefore an individual emergency preparedness plan, which aligns with the Council's plan should be sought at the time of making a planning application to help prepare for any environmental or human risks.

4.3.13 *SD17 Air quality*

Option 1 (preferred approach) requires developments to both maintain and improve air quality,- which is fully aligned with the SA Air quality objective and will help reduce CO₂ emissions (supporting climate change impact reduction). Improved conditions may help enhance biodiversity, preserve heritage settings and maintain health (local residents). Cumulatively this may help improve the area profile which may be beneficial in a town centre or local centre setting to support town centre revitalisation SA objective.

In a no policy scenario the NPPF will apply which requires developments to mitigate worsening of air quality. This could imply a minor negative effect on local air quality, but cumulative effect from many developments within a local area will have overall negative effect on biodiversity, human health, cultural heritage and town centre/local centre's vitality.

4.3.14 *SD18 Noise Protection*

Both the preferred option (which provides noise sensitive development location guidance and noise exposure level guidance) and Option 2 (former PPS24 Noise exposure levels guidance) will have positive effect on the human health SA objective and will have neutral effect on other SA objectives.

4.3.15 *SD19 External Lighting*

Option 1 (preferred option) includes requirements to limit spillage on ecological and human receptors and on road users/ water ways users and to avoid glare and spillage. Option 2 is a no policy scenario where the NPPF policy applies which requires protection to biodiversity features, safeguarding open spaces and provides specific guidance on materials including townscape features protection. Option 1 and option 2 therefore are found to be supportive of the biodiversity, landscape character and human health objectives. Option 1, in addition to the above, recognises the need to incorporate external lighting features sufficient for security purposes- which will help support the reducing crime SA objective.

4.3.16

TLC3 Primary Frontage

Option 1 (retention of current Watford Development Plan 2000 Policy S5 which imposes % restriction by linear frontage) and option 2 (proposed approach) that adopts Policy S5, but removes the linear frontage restriction and will not allow use classes other than A1, A2 or A3 in the ground floor.

By retaining A1, A2 or A3 use at the ground floor level, the assessment predicts that both options will help maintain active frontages and thus create a sense of vibrancy in the town centre. However due to the imposed restriction in terms of % linear frontage, Option 1 may be limited in embracing opportunities to reduce vacancy rates in the town centre. For this reason a split assessment of both uncertain and minor positive is assigned to Option 1, whereas Option 2 will take a flexible approach to help reduce vacancy rates, and equally restrict use class within the town centre.

4.3.17

TLC 4 INTU Shopping Centres

Option 2 (retain current Watford Plan 2000 policy S6) and Option 1 (preferred approach, to include Charter Place to S6)

Both options support A1 type use and to an extent (10%) that of A2 and A3 use. Both options combined with TLC 3 and TLC5 are likely to help maintain a balance of A1, A2 and A3 uses- thus will create attractive and active frontage from the High Street side of the Harlequin and Charter Place and support the town centre revitalisation SA objective. Assessment predicts neutral effect across other objectives.

4.3.18

TLC5 Secondary Frontage

Option 2 (retain current Watford Plan 2000 Policy S7) and Option 1 (preferred approach to amend S7 so that A2 and A3 are allowed but A4 and A5 restricted).

Both options will help maintain non-retail sector economy and related jobs. Option 1, by restricting A4 and A5 use is most likely to limit creation of plain and uninteresting frontages. On the contrary, A2 and A3 use may help animate the shopping area thus add to the vibrancy of the town centre.

4.3.19

TLC6 A3 Hubs

Option 1 (allows A3 use within the Hubs without any % restriction and not to allow additional A4 and A5 use) and Option 2 (do-nothing).

By creating A3 hubs at each end of the high street which will generate sense of busy and animated spaces, Option 1 may help attract retail users into the town centre- thus help revitalise the town centre. The policy strongly resists inclusion of

dull unanimated spaces by not allowing A4 and A5 use and clearly supports vibrancy in the area. Option 2 will continue business as-usual with potential increase in vacancy rates, or may reflect any improvement in the wider economy.

4.3.20

TLC7 Control of Nuisance

Option 2 (retain Watford Plan 2000 policies S11 and S12) and Option 1 (amalgamate S11 and S12 policies, with some amendment).

Both options will contribute to limiting nuisance to A3-A5 use neighbours, therefore help limit stress and to lead a healthy lifestyle. Both options explicitly address community safety and security aspects, and include measures that will prevent environmental crime- thus supporting reduction of crime (perceived and actual).

Option 2, which includes traffic generation criterion in determining applications for the A3-A5 use buildings will most likely limit air quality deterioration (from vehicle emissions), whereas the proposed option 1 does not explicitly add this criterion; for this reason the assessment has assigned an uncertain rating against the Air quality objective.

4.3.21

TLC8 Character Areas

- (i) Commercial area- Clarendon Road: Option 1(Core Strategy policies SS1 and EMP1) and option 2 (retention of commercial floor space in the commercial area around Clarendon Road- same as EMP3 of the Development Management policies).

As the options are the same in EMP3, refer to Section 4.3.31 for the assessment result discussion.

- (ii) Cultural Area: The Parade and Colosseum/Palace Theatre: Option 1 (Core Strategy Policy TLC1), Option 2 (to continue with the role of the area, and resist change from this use but support residential development) and Option 3 (retain current convenience store, but allow addition of A Use class and residential units on the first floor). Options 2 and 3 are likely to support provision of housing, and potentially allocate affordable units, thus support this SA objective.

Options 1 and 2 are likely to continue their support in the provision of space to create a sense of place and community. It is unclear whether bringing other A type use and residential units into the area will add to or deteriorate the cultural quality of the area. In general, all options will support the creation of vibrant spaces, therefore support town centre revitalisation.

- (iii) Civic area: Option 1 (do-nothing), Option 2 (to support development of the underused part of the area) and Option 3 (levy S106/ developer contribution on redevelopment proposals in the area towards public realm works).

Option 3 is supportive of maintaining or restoring the townscape character of the area, therefore may create a sense of place and pride within the community; whereas under Option 1, there may be deterioration of townscape character in the absence of public realm improvements. Under Option 2, dependent on interaction of the development management policies relating to built heritage, and the design of proposed developments, there may or may not be a support to the townscape character SA objective or to help create sense of place for the community.

Whilst a neutral effect is predicted for option 1 under all other SA objectives, Options 2 and 3 are likely to support economic growth, but the effect of Option 3 on town centre revitalisation is split between significant positive and uncertain effect. Significant positive as improvements to the area is likely to generate interest in the area therefore potentially increase inward investment, but this will occur only if developers come forward to redevelop in the area where S106 payments are required (therefore also the uncertain effect).

- (iv) Queens Road and Market Street Specialist/Local Shopping Areas: Option 1 (continue with Core Strategy policy TCP3), Option 2 (encourage local independent stores, but limit demolition unless replaced with buildings that meet needs of local stores) and Option 3 (develop policy with local store owners and encourage de-cluttering of the public realm). All options will support local economic growth and revitalisation of town centre/local centre objectives.

Option 3 is supportive of the townscape character SA objective, by aiming to de-clutter the public realm and potentially improving character of the area. As this process will include consultation with local independent stores and local people the option also scores well under the social inclusion objective.

Both Options 2 and 3 are supportive of local independent stores most likely from within the community, thus a minor positive effect on the community identity and participation objective.

- (v) Lower High Street King Street to Ring Road - south– Shopping and Restaurant Area: Option 1 (Core Strategy Policies TCP 3 and 4), Option 2 (encourage local independent shops and restrict demolition), and Option 3 (modernise Council owned property (with tenants) along the Key route between High Street station and the shopping malls).

All three options will help maintain interest in the local centre, and therefore linked to town centre enhancement. Options 1 and 2 will support local independent shops- supporting local economic growth. Option 2 will help maintain the conservation area character, therefore supporting the townscape character objective and by supporting local independent stores it will most likely help create a sense of community.

- (vi) Heritage Area St Mary's and High Street/King Street conservation areas:
Option 1 (no new policy as conservation area management plan will suffice),
Option 2 (safeguard the green space near the Church Road car park to connect to green link and improve the area). It is unclear whether the options are pitched against each other, however each of the option will be beneficial to maintain the conservation area character, therefore the townscape features of the area. Under Option 2, by maintaining the green link the area may provide space for the local community for exercise and in general contribute to well-being.

4.3.22

TLC 9 Public Realm

Option 1 is to collect S106 contribution towards public realm improvements in the town centre. This proposal will help create attractive places to live and increase local identity and will help improve inward investment into the area (revitalising the town centre). The policy option is likely to create attractive places to live and create local identity therefore support the community identity objective. The improvements may generate interest in the area therefore potentially increase inward investment, but this will occur only if developers come forward to redevelop in the area where S106 payments are required. Therefore a split assessment of significant positive and uncertain rating is allocated to the town centre revitalisation objective.

4.3.23

TLC 10 Restriction of Non A1 Uses

District centre: All options proposed will support the provision of space for services and jobs in the services sector, therefore support SA18 (economic growth).

Neighbourhood centres: By retaining a percentage of retail related use, all options will help create a sense of activity and buzz around the neighbourhood centre, which in turn will help improve vitality of the neighbourhood centre (supporting SA 20-revitalising town centre) as well as promote economic growth.

Local centres: All proposed options will ensure local communities have access to retail services, including convenience retail, thus supporting SA 19 (access to services).

4.3.24

TLC 11 Community Facilities

Option 1 (preferred approach) will help development of new community facilities and equally look to safeguard existing facilities from future development. Option 2 is a do-nothing scenario. Option 1 will help maintain access to local community facilities that are likely to create a sense of belonging to the area (community identity objective), and is likely to encourage interaction that may contribute to the health and well-being of the residents. On the other hand, in the absence of safeguards for existing facilities or potential to support new facilities, Option 2 will have a minor negative effect on the community identity objective.

4.3.25

HS5 Conversion of HMOs to flats

Option 1 (preferred approach)- a combination of Core Strategy Policy H4 and vacancy evidence of the premises will be required for a conversion application. A do-nothing option does not apply to this topic as current national policy on conversion of HMOs exists and the proposal gives further guidance on the Council's approach while assessing applications.

The option will promote mix of housing tenure, supporting housing SA objective and will use PDL. Policy H4 (which will be referred to under HS5) will help to protect existing health services and will ensure appropriate provision for new dwellers- supporting the health objective.

Development under the policy may increase or reduce per capita water consumption and car related traffic (therefore impact cannot be predicted at this stage for the water and air quality objectives).

4.3.26

HS6 Applications for new HMOs or hostels

Two options are proposed- option 1 (preferred approach) incorporating criteria for consideration of new HMOs conversions and option 2 (do-nothing where Article 4 Direction will apply).

Under both option scenarios, the effect on water resources is found to be negative as the revision to housing use from commercial (unless restaurants) use will increase per capita water consumption. With no explicit guidance on how biodiversity features, if any at the existing site is to be addressed, conversion under both options may not help achieve the biodiversity objective.

Both options, however are rated to have minor positive effect on the housing objective and will help maximise use of PDL. If the HMOs are to be used by students or workforce that study or work in the Borough or just outside the Borough, both options will support the sustainable development patterns objective. Equally where this is not the case, neither of the options will have an effect on the SA objective.

Option 1 places emphasis on the design to respect the character of the local area, supporting the cultural heritage objective.

4.3.27

HS7 Conversions and Extensions

Option 1 (preferred approach)- set criteria to assess applications, Option 2 (identify areas where conversion will be restricted) and Option 3 (provide minimum internal space restrictions).

All options will support achieving the good quality housing objective as they offer mix of tenure and type of accommodation. The options will maximise use of PDL.

and if the future residents live or work in the area (purpose for conversion), all options will support sustainable patterns of development SA objective.

All options have the potential to increase car numbers on the road, therefore emissions and deteriorate air quality. Although under Option 1, pressure on existing car parking will be qualification criterion, if there is space to accommodate new cars the conversion can be permitted.

Position of the options on supporting the cultural heritage and townscape character objectives cannot be determined at this stage and will be determined on a case by case basis. However position of Option 1 relating to access to health services and open spaces/green spaces and protecting existing provision is clear-supporting the health objective.

4.3.28 *HS8 Non-residential Proposals in residential areas*

Proposed option is a policy that is being brought forward from the Watford Plan 2000. The option sets criteria for applications on non-residential use in a residential area. As the current policy is in practice a no policy option has not been considered.

HS8 is supportive of many sustainability objectives (minor positive) as the policy includes strict criteria to protect local character, open space features as well as air quality. The policy will also consider live-work units, which will support the sustainable patterns of development objective and in-turn may help contribute to local economic growth.

4.3.29 *HS9 Retention of Affordable Housing*

Policy option is being brought forward from the Watford Plan 2000 and a no policy scenario has therefore not been considered.

The proposed option will help secure affordable accommodation for families that cannot compete in the market- thus help achieve equity and social inclusion. It will also help maintain a mix of housing provision therefore allowing range of workforce to stay in the Borough and support prosperity of the area.

Although the policy will help maintain existing affordable housing provision, the policy does not fulfil assessment criteria under the good quality housing provision objective, such as promoting more affordable housing or improving existing provision. For this reason neutral effect is predicted against the good quality housing objective.

4.3.30 *HS10 Garden development*

Option 1 (do nothing), Option 2 (do not allow back garden development) and proposed approach Option 3 (allow back garden development, subject to adherence to the set criteria).

Options 2 and 3 are protective about the biodiversity features within a back garden, whereas in the absence of a policy developments may affect these features, especially where small habitats may have been already created.

The flood risk and pollution development management policies will apply to Options 1 and 3, thus they support respective SA objectives. On the same token, as both options will result in progressing development in gardens (loss of top soil) they will have minor negative effect on soil SA objective. Where the site is close to a congestion hotspot or area known for poor air quality, conversion of back garden (potentially by cutting trees) will reduce the air purification function in the area. For this reason development under options 1 and 3 will have a minor negative impact on air quality.

While landscape character and historic features around a site may be protected under both Options 1 and 3 by the built heritage development management policies, Option 3 includes specific strict criteria to enhance the cultural heritage and landscape/ townscape character of an area- thus having a significant positive effect against these SA objectives.

4.3.31

EMP3 Clarendon Road and Bridle Path Office Area

The following options were put forward under this topic, however for assessment purposes only Option 2 and Option 6 were considered realistic to be taken forward for the SA.

Option 1: Without the plan. Not reasonable, therefore not assessed.

Option 2: Relying on the employment policies set out in the adopted Core Strategy only.

Option 3: Introducing separate criteria for consideration of employment generating and non-employment generating uses within employment areas. Option considered unnecessary given criteria in EMP2 - therefore not assessed.

Option 4: Bringing forward of Watford District Plan 2000 policies relating to existing and proposed employment uses outside of allocated employment areas. Option considered unnecessary given that sufficient employment space has been identified in the Core Strategy - therefore not assessed.

Option 5: Including a policy on live/work units – this was considered unnecessary as the previous District Plan policy on live/work units was never used and therefore was not saved in 2007. This option has therefore not been assessed.

Option 6: Specific policy to protect Clarendon Road as a primary office location and encourage improvements to the quality and supply of office accommodation in that location. The Preferred Option.

Option 7: WBC also considered whether specific policies were needed in respect of Watford Business Park or other employment areas. This is a procedural issue that is difficult to appraise using the standard assessment matrix format.

The assessment concluded that both options will generate positive effects towards achieving the economic growth and access to services objectives, but Option 2 will not provide the same level of protection for the Clarendon Road area and Bridle Path area, nor the drive towards improving the quality of the office provision in this part of the Borough so that high quality office occupiers are attracted to the Borough. For this reason Option 6 is found to have significant positive effects on the economic growth and access to services objectives.

Due to the proximity of the site to town centre, guidance on the scale of non-B class use which will not undermine the role of the town centre, under Option 6 will support achieving the town centre revitalisation objective.

4.3.32

T6 Car Parking Standards

Five options have been considered- Option 1 (continue with Watford Development Plan 2000 standards), Option 2 (more restrictive maximum parking standards than WDP), Option 3 (less restrictive than WDP2000), Option 4 (leave to developers) and Option 5 (residential and non-residential parking standards-preferred approach).

Options 3 and 4 will result in increased car park space, most likely impermeable surfaces which will increase the flood risk and due to increased space more cars will be on the road (increased vehicle emissions therefore decreased air quality). These in turn will affect health of road users and discourage people from adopting healthier lifestyle (such as cycling or walking). Allowing higher levels of parking could make it more difficult for non-car users to access services, affecting achievement of the equity and social inclusion SA objective.

Option 1 allows adequate parking spaces for business uses, thus supporting economic growth.

Imposing more restrictive car parking standards (Option 2) is likely to reduce car usage for shorter trips, therefore limiting transport emissions, including GHG and improving air quality. This may have a positive impact on the health of road users, but will benefit residents only if they choose alternate methods such as walking or cycling. Restrictive parking under this option could lead to businesses being discouraged from moving to Watford, thereby affecting the economic growth objective.

Option 5 provides a balance between meeting the demand for parking, whilst aiming to not encourage excessive car use. This will help support this objective by facilitating access to services for all members of society- supporting equity and social inclusion. The option allows appropriate provision for businesses,

supporting local economic growth objective. Taking a balanced approach may encourage residents to opt for healthier modes of transport such as walking or cycling (for shorter trips), and therefore supporting the health objective. Although positive under many objectives, it is uncertain as to how the option will contribute to achieving overall air quality and carbon emissions reduction objectives, because the car parking provision for residential development in the Controlled Parking Zone is slightly higher in the new DM policy than in WDP 2000. However, outside the CPZ the provision is slightly lower than the WDP 2000.

4.3.33

T7 Electric Charging Points/ Low Emission Vehicles

Option 2 (electric vehicle charging points will be encouraged at commercial premises) and Option 1 (do nothing).

Option 2 will help improve air quality (assuming the electric vehicles are locally owned or locally run). Such a provision may project an image of the Borough adopting to emerging technology, which may indirectly contribute to prosperity. In terms of reducing climate change emissions local vehicle emissions may be reduced, but the wider debate may suggest that fossil fuels are burnt to generate electricity- negating the local positive effect the option may generate under the climate change impact reduction objective. Unless the source of electricity is renewable impact against this objective cannot be stated with certainty.

4.3.34

T8 Cycle Parking Standards

Option 1 (preferred option promotes cycling, but on a pre-condition that securing cycle storage at origin or destination will be a requirement), Option 2: Increased cycle parking standards; Option 3: Decreased cycle parking standards and Option 4: No cycle parking standards

Under Option 1, the levels of cycling parking provision encourage a certain level of day to day cycling in the Borough which will help to reduce GHG emissions. Implying maintaining air quality, and potentially contribute to the health and well-being of the residents and road users.

Under Option 2 increased cycle parking standards may result in greater positive effects in the long-term by making cycling a more feasible mode of transport and reducing GHG emissions from vehicles. This implies improved air quality (significant impact) and potentially having a significant impact on the health and well-being of the road users and residents. Increased cycle parking standards could lead to an improved environment in the town centre, but only if it helps to reduce the volume of cars. For this reason the effect of Option 2 under the town centre objective is uncertain.

Both Option 3 and 4 will have minor negative impact on the climate change, air quality and health objectives as they do not attempt to support reduction of transport emissions.

4.3.35

T9 Access and Servicing

Option 1 (proposed approach) requires all proposals, including redevelopment or alterations to give sufficient consideration to vehicle access and egress from a safety perspective. This consideration will have a direct effect on increasing safety for the building occupants (by ensuring access for emergency services) thus supporting well-being of the occupants. Indirect benefit also includes potential reduction in short term congestion owing to egress delays (negligible support to air quality objectives).

4.3.36

UD3 Shop fronts and Advertisements

Option 1 (proposed approach) sets guidelines for signage to protect and maintain the design character of an area, including within a heritage conservation area- thus supporting cultural heritage objective. The option aims at creating a unified pattern in terms of design thus adding to the visual amenity and character of the local settings- supporting the townscape character objective. The enhanced visual amenity may contribute to the attractiveness of the town centre (supporting revitalisation of the town centre).

In a do-nothing scenario (Option 2), in the absence of any guidance and control on the appearance and signage, new developments may produce designs that are not suitable to the settings and could lead to erosion of the area's local character (including that of a historic setting) and may spoil the townscape character.

4.3.37

UD4 Built Heritage

Option 1 (preferred approach) takes a holistic approach to conservation of the built heritage by including landscape and trees that will form part of these areas. By preserving the trees and landscape there is a potential to maintain species and habitats in an area.

Option 2 is a do-nothing scenario, where national policies will apply. These policies place a statutory duty on the Council to preserve historic assets.

It is likely that both options would have contributed to maintaining or protecting the historic setting or cultural assets in an area. As option 1 adds to the protection and enhancement of the cultural assets and to the local character of an area it is considered to support the townscape character and cultural heritage objectives in a significant way. This approach may add value in the context of a town centre location (such as Charter Place), therefore option 1 is likely to contribute to town centre revitalisation.

4.3.38

GI5 Trees, Woodlands and Hedgerows

Option 1 (proposed approach) has been assessed in this report. No alternatives were considered for this policy topic.

By supporting protection of trees and woodlands the option will help maintain various environmental functions of trees, such as flood storage (where applicable), purifying air, carbon sequestration (climate change reduction) and preserving habitats and biodiversity. These functions may have a positive impact on human health and well-being of the residents (if not at a Borough level, at a localised scale).

At the first internal assessment stage, the SA made recommendation to strengthen policy wording to encourage new planting within new developments, both within and outside the SPAs. The recommendation has been incorporated in this consultation version.

4.3.39

GI6 Sports Hubs

Option 1(proposed approach) provides guidance on how applications for sports hubs development will be considered. No alternative option has been proposed.

The proposed option is supportive of provision of space for recreation across the Borough, which is well distributed (including deprived wards- see Site Allocations Document for location)- therefore supports both the health objective and equity and social inclusion objective.

4.3.40

GI7 Open Space and Children/Young Person's Play Space in Residential Development

Option 1(proposed approach) provides guidance on space provision for open space and play space in new developments. No alternative option has been proposed.

The proposed option is supportive of both safeguarding existing provision and creation of new open spaces and play spaces as part of new developments therefore supports both the health objective and equity and social inclusion objective.

4.4

Next Stages

Further to this consultation, responses specific to the Sustainability Appraisal Report contents, or to the Local Plan options will be assessed and addressed at the subsequent Submission version stage. At that stage, when the policy options and the policy wordings are finalised, the SA Report will be updated to reflect amendments to the assessment should any significant change be proposed to the policy options. This future stage SA will also contain detailed information on the cumulative, synergistic and secondary effects of the development management policies and include a monitoring framework that will suggest mitigation and measurements for predicted significant effects.