



Elmbridge

Borough Council

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Elmbridge Local Plan

Proposed Submission Development Management Plan – Draft
Sustainability Appraisal Report

February 2014

Viewing and Commenting on the Document

This report forms part of the publication stage Development Management Plan document on which the Council is inviting comments.

The consultation period runs from 3 February 2014 to 17 March 2014.

The publication version Development Management Plan document and all of the supporting documentation can be viewed on the Council's website www.elmbridge.gov.uk/planning
Hard copies are also available to view at Elmbridge Civic Centre Planning Reception and libraries throughout the Borough.

If you have any comments to make on this Sustainability Appraisal or would like further information about the consultation or any other aspect of the Local Plan process, please contact the Council using either of the following methods:

Telephone: 01372 474787

Email: consultation@elmbridge.gov.uk

Or alternatively, write to us at: **Planning Policy Team, Elmbridge Borough Council, Civic Centre, High Street, Esher, Surrey, KT10 9SD.**

Responses can also be submitted through the Council's consultation portal, which is accessible via the Council website www.elmbridge.gov.uk/planning



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1. Background and Methodology

The Development Management Plan

1.1. The Development Management Plan sets out detailed, criteria based planning policies which will be used to assess planning applications. The policies focus on positive outcomes rather than negatively worded policies with strict criteria that attempt to 'control' development. If found sound and adopted by the Council it will form part of the Council's Local Plan alongside its Core Strategy which was adopted in July 2011. The Council are also preparing Settlement Investment and Development Plans which will allocate sites for development and designate those areas where uses will be restricted such as open space and strategic employment land.

1.2. The SA of the Development Management Plan has been completed in the context of the Core Strategy which sets out the vision, spatial strategy and strategic policies (such as housing targets) for the Borough. Since the more detailed policies in the Development Management Plan must be in conformity with, and support the implementation of, the Core Strategy many of the key sustainability issues regarding development in the Borough have already been assessed and appropriate mitigation put in place as part of that Plan. The SA of the Core Strategy can be found on the Council's website at www.elmbridge.gov.uk/planning/policy.

Purpose of the Sustainability Appraisal and Report

1.3. A Sustainability Appraisal (SA) of new, or revised, Local Plans is required by Section 19 of the Planning and Compulsory Purchase Act 2004. Section 39 of the same Act requires that the authority preparing a Local Plan must do so 'with the objective of contributing to the achievement of sustainable development'. The SA process therefore provides an opportunity to consider options in which the plan can contribute to improvements in social, economic and environmental conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. The SA process is governed by a range of European and national legislation and supported by Government policy, including:

- The requirements of European Directive 2001/42/EC (often known as the Strategic Environmental Assessment, or SEA, Directive) which requires the preparation of an environmental report that considers the significant environmental effects of a plan or programme. The SEA directive is transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004: Statutory Instrument 2004 No. 1633 (SEA Regulations);
- The 2004 Planning and Compulsory Purchase Act, which requires SA of all emerging Development Plan Documents and Supplementary Planning Documents;
- The Town and Country Planning (Local Planning) (England) Regulations 2012 which highlights the Sustainability Appraisal as one of the submission documents for local plans; and

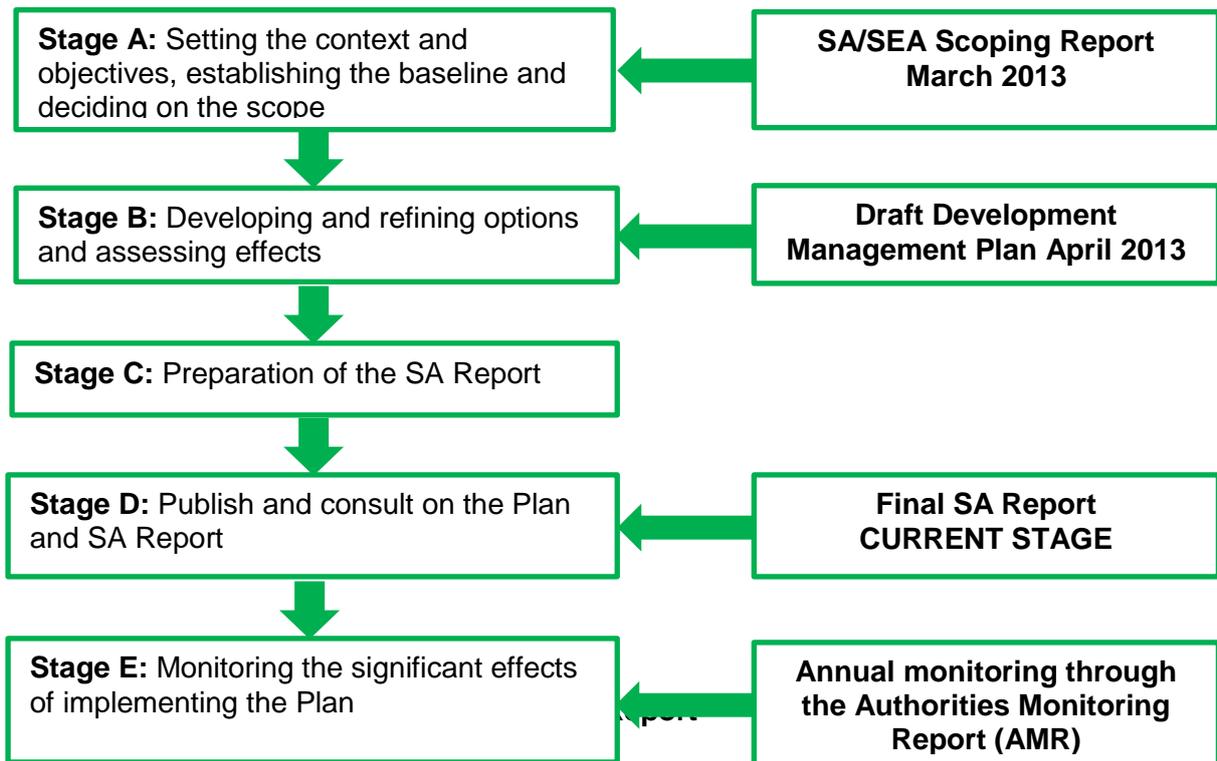
- The National Planning Policy Framework (NPPF), which states that planning policies should be based on up-to-date information about the natural environment and other characteristics of the area including a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment which 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.

1.4. SA is also subjected to the same level of public consultation and scrutiny as the main Development Management Plan itself. Chapter 2 of this report outlines the approach to SA in more detail.

When and who carried out the SA

1.5. The SA preparation process commenced back in 2005 when Surrey County Council and the East Surrey Local Plan Working Group progressed much of the initial scoping work along with appropriate statutory consultees. This established a shared methodology across the five constituent Authorities of Elmbridge, Runnymede, Spelthorne, Woking and Mole Valley Borough Councils, and has supports a shared approach which allows authorities consider sustainability issues across boundaries and where necessary identify those issues that may require further co-operation.

1.6. The approach taken by the Council to SA for the Development Management Plan follows the five stage process, outlined below.



1.7. The SA process was carried out by officers of the Council and this report is part of the penultimate stage of preparation, which requires the Council to consult on both the Plan itself and the SA, prior to the formal submission to the Secretary of State.

1.8. A Scoping Report was published in 2005 to form part of the evidence base supporting the development of the Core Strategy. As part of the preparation of the Development Management Plan and Settlement Investment and Development Plans, the evidence within the 2010 Scoping Report was updated to take account of changes in data, plans and policy since the initial publication date. A revised Scoping Report was consulted on during the summer of 2012 and published in March 2013 and is available on the Council's website www.elmridge.gov.uk/planning.

Stage B: Developing and refining options and assessing effects

1.9. As part of the preparation of the preferred approach set out in the draft Development Management Plan each of the options was appraised. This appraisal was then included as part of the justification within the draft Plan. Consultation on the draft Development Management Plan was undertaken during April and May 2013. Any comments on the sustainability appraisals were considered and taken into account during the preparation of the Development Management Plan to be submitted for examination. In addition the likely impacts of any significant changes to the preferred policies in the Development Management Plan were considered in refining each policy.

Stage C: Preparing the SA Report

1.10. This report sets out and considers the significant effects of the policy options and any changes to preferred policies during the preparation of the Development Management Plan. To avoid duplication between reports this SA will not repeat baseline information already gathered in the Scoping Report. Instead this document summarises and cross references this report where appropriate.

Stage D: Consulting on the SA Report

1.11. This will take place alongside the consultation on the proposed submission Development Management Plan in January 2014 for a six week period. Following this consultation the Plan will be submitted for examination by May 2014.

Stage E: Monitoring the significant effects of implementing the Plan

1.12. Any predicted significant effects will be monitored after implementation of the Plan and reported annually through the Council's Authorities Monitoring Report which can be found on the Council's website.

2. Integration with other Assessments

Habitats Regulation Assessment

2.1. The European Directive (92/43/EEC) on the conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive) protects habitats and species of European nature conservation importance. The Habitats Directive established a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites and comprise of Special Areas of Conservation (SAC) and Special Protection Areas (SPA).

2.2. Article 6 of the Habitats Directive and Regulation 48 of the Habitats Regulations 2010 states the need to determine if an Appropriate Assessment (AA) is required for proposed plans or projects which are not necessary for the management of the site but which are likely to have a significant effect on one or more Natura 2000 sites.

2.3. A full screening assessment was undertaken as part of the preparation of the Development Management Plan and was consulted on during early 2013 as part of the consultation on the Draft Plan. This screening assessment is available on line at www.elmbridge.gov.uk/planning/policy.

2.4. The Development Management Plan does not seek to deliver development in a different manner, either in extent or location, to that set out in the Core Strategy. The policies contained in the document are therefore in conformity with the Core Strategy and subject to the mitigation required within that Strategy to minimise the impact of development on European sites - in particular policy CS13 in the Core Strategy, which sets out the Council's approach to addressing the impact on the Thames Basin Heaths SPA. Therefore, it is not expected that the Development Management Plan will have any significant impacts, alone or in combination with other plans, on the integrity of the Natura 2000 sites to that identified in the HRA for the Core Strategy.

Equalities Impact Assessment (EqIA)

2.5. The Equality Act 2010 places a duty on public bodies to have due regard to reduce the inequalities of outcome which result from socio-economic disadvantage. The Act sets out the different ways in which it is unlawful to treat someone, such as direct and indirect discrimination, harassment or failing to adapt premises for use by those with disabilities. Everybody has one or more of the protected characteristics, so the Act gives everyone greater protection from unfair treatment. The Act also introduced the term "protected characteristics" to refer to groups that are protected under its contents. The nine 'protected characteristics' are listed below:

- **Age:** The Act protects employees of all ages but remains the only protected characteristic that allows employers to justify direct discrimination, i.e. if an employer can demonstrate that to apply different treatment because of someone's age constitutes a proportionate means of meeting a legitimate aim, then no discrimination will have taken place.
- **Disability:** Under the Act, a person has a disability if they have a physical or mental impairment and the impairment has a substantial and long-term adverse effect on

their ability to perform normal day-to-day activities. It is also unlawful, with limited exceptions, for employers to ask job applicants questions about disability or health before making a job offer

- **Gender Reassignment:** Under the Act, it is discriminatory to treat people who propose to start to, or have completed a process to change their gender less favorably. A transsexual person has the protected characteristic of gender reassignment.
- **Marriage and Civil Partnership:** This refers to people who have the common characteristic of being married or of being civil partners. A heterosexual man and a heterosexual woman who are married to each other, or a man and another man who are civil partners and woman and another woman who are civil partners all share the protected characteristic of marriage and civil partnership. This only applies at work or if someone is being trained for work. Single people are not protected by the legislation, neither are those who are engaged to be married, or those who are divorcees or who have had their civil partnership dissolved.
- **Race:** The Act continues to protect people against discrimination on the grounds of their nationality, colour, or ethnic or racial origin.
- **Sex:** The Act continues to protect both males and females from discrimination on the grounds of their sex.
- **Sexual orientation:** The Act continues to protect heterosexual, bisexual, and lesbian and gay people from discrimination on the grounds of their orientation. People sharing a sexual orientation mean that they are of the same sexual orientation and therefore share the characteristic of sexual orientation
- **Religion or Belief:** The Act continues to protect people against discrimination on the grounds of their religion or belief. To be considered a belief for the purposes of the Act it must be genuinely held; be a belief and not an opinion or viewpoint; be a belief as to a weighty and substantial aspect of human life and behaviour; attain a certain level of cogency, seriousness, cohesion and importance; and be worthy of respect in a democratic society, compatible with human dignity and not conflict with the fundamental rights of others. In this respect the Act only refers to philosophical beliefs such as Humanism and Atheism, or to religions e.g. Christianity. It excludes, for example, those who 'believe' they should follow a particular football team.
- **Pregnancy and Maternity:** The Act will continue to protect women from discrimination as a result of being pregnant or having given birth.

2.6. The Development Management Plan was subjected to the same EqIA process as the Core Strategy. The additional EqIA provides further evidence of the Council's commitment to promoting equalities and seeks to ensure that the Development Management policies will not have any undue impacts on particular community groups within the Borough.

2.7. As the policies are not offering a specific service or function for exclusive use by members of any of the individual protected characteristics, the assessment process

concluded that the overall impact was neutral in terms of direct benefits for any of the protected characteristics.

2.8. However, irrespective of the protected characteristics, it is likely there would be indirect benefits at an individual level arising from the implementation of the policies. For example, those who are unemployed or have a low income could find their prospects are boosted by the policies to protect employment land and promote job creation in the Borough. Creating jobs can also potentially help in reducing crime and the fear of crime. This would apply irrespective of race, age, sex or other factors, and would also boost community cohesion. In the same way, the provision of additional housing can help to improve community cohesion, bringing further benefits to human health and well-being.

2.9. However, not all of the issues raised by the Equality Act are within the control of the planning system. Although planning policy can provide the land and facilities for employment uses to take place, market forces will still, to an extent, determine the types of company which take occupancy of the premises.

3. Baseline, Context and Sustainability Objectives

3.1. The Sustainability Appraisal framework against which policies are assessed consists of a series of objectives. These objectives provide a way in which the effects of the Local Plan on sustainability issues can be described, analysed and compared. As outlined earlier the objectives were developed at the scoping stage, and form the basis of the assessment.

3.2. In setting these objectives the scoping stage should identify the relevant policies, plans and programmes and collect the necessary baseline information in order to identify key sustainability issues and establish the sustainability objectives. It should be noted that these SA objectives are different in concept and purpose from the fundamental objectives of the Plan, though there is a degree of overlap in terms of key themes. The SA objectives address the full cross-section of sustainability issues, including social, economic and environmental factors laid down by the law or policy. A list of the SA objectives is defined later in this next chapter.

This section meets the SEAs Directive requiring:

An environmental report to include.... “an outline of the plan’s relationship with other relevant plans and programmes...” and “...the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives...”

“The relevant aspect of the current state of the environment and the likely evolution thereof without implementation of the plan, or programme”

“The environmental characteristics of those areas likely to be significantly affected”

“Any existing problems which are relevant to the plan or programme including, in particular those relating to any areas or a particular environmental importance such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and Habitats Directive”

“The environmental protection objectives, established as international, Community or Member State level, which are relevant to the Plan or Programme and the way those objectives and any environmental considerations have been taken into account during its preparation”.

An environmental report to include.... “An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken, including any difficulties....encountered in compiling the required information”

“The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme”.

Baseline and context

3.3. The full SA and SEA Scoping Report 2013 forms part of the environmental report required by the SEA directive. A thorough review was undertaken of other relevant plans, policies and programmes and this was presented in the updated Scoping Report. The purpose of this was to meet the requirement of the SEA Directive to take account of

environmental protection objectives and to gather other information that would influence options to be considered in plan preparation.

3.4. The review of plans, policies and programmes and baseline research enabled the identification of key sustainability issues in the Borough (including environmental problems as required by the SEA Directive). On the basis of the issues identified, a list of sustainability appraisal objectives was defined. These are used to test how likely the proposals in the Local Plan and alternative options are to lead to more sustainable outcomes. Details of relevant Plans, policies, and programmes, baseline evidence and sustainability issues can be found in the Scoping Report.

Sustainability Objectives

3.5. During the time which elapsed between the production of the 2005 SA report and its 2013 update, many alterations were made to the national planning system following the change in Government. The NPPF itself was one of these; and replaced the series of planning policy guidance notes, planning policy statements and various Government circulars. However, although the national policy position must be taken into account in delivering sustainable development, there is no guidance available to show exactly how the NPPF should influence the selection of Sustainability Appraisal objectives.

3.6. Table 1 cross-references the SA objectives against the relevant topic within the SEA directive and NPPF paragraphs, and is included to show how the NPPF influenced the updated Scoping Report. The objectives were used to appraise the policies at both draft consultation stage in April/May 2013 (Regulation 18) and publication stage (Regulation 19).

Table 1: SA Objectives

Theme	Sustainability Appraisal Objective	SEA Directive Topic	Relevant NPPF Paragraph
Social Progress that meets the needs of everyone	1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford	Population, material assets	17, 47-52, 54, 55
	2. To facilitate the improved health and well-being of the whole population	Human Health, population	17, 69, 70, 73-78
	3. To reduce poverty, crime and social exclusion	Population	17, 28, 69, 70
	4. To minimise the harm from flooding	Human Health, Water, Landscape	17, 94, 99-104
	5. To improve accessibility to all services and facilities	Population	17, 28-30, 37, 38, 69, 70
Effective Protection of	6. To make the best use of previously developed land and existing buildings	Landscape, Climatic Factors	17, 89, 111

Theme	Sustainability Appraisal Objective	SEA Directive Topic	Relevant NPPF Paragraph
	7. To reduce land contamination and safeguard soil quality and quantity	Air, water , soil	17, 109, 110, 112, 120-125
	8. To ensure air quality continues to improve	Air, water , soil	17, 109, 110, 112, 120-125
	9. To reduce noise pollution	Air, water , soil	17, 109, 110, 112, 120-125
	10. To reduce light pollution	Air, water , soil	17, 109, 110, 112, 120-125
	11. To improve the water quality of rivers and groundwater, and maintain an adequate supply of water	Air, water , soil	17, 109, 110, 112, 120-125
	12. To conserve and enhance biodiversity within the plan area	Biodiversity, flora, fauna	17, 109, 110, 113, 114, 117-119
	13. To protect and enhance the natural, archaeological, historic environments and cultural assets	Cultural Heritage	17, 126-141
	14. To reduce the need to travel, encourage sustainable transport options and make the best use of existing transport infrastructure	Human health, air, climatic factors	17, 29-38, 93, 95
	15. To ensure that the District adapts to the impacts of the changing climate	Climatic factors	17, 30, 34, 93-99, 156
Maintenance of high and stable levels of growth	16. Provide for employment opportunities to meet the needs of the local economy	Population	17-28
	17. Support economic growth which is inclusive, innovative and sustainable	Population	17-28
Prudent use of natural resources	18. To achieve sustainable production and use of resources	Climatic factors	17, 30, 34, 93-99

Theme	Sustainability Appraisal Objective	SEA Directive Topic	Relevant NPPF Paragraph
	19. To increase energy efficiency and the production of energy from low carbon technologies, renewable sources and decentralised generation systems.	Climatic factors	17, 30, 34, 91, 93-99

4. Plan Issues and Options

4.1 A summary of the results of the appraisal of the preferred options and rejected alternative approaches for the draft appears over the following pages, together with an evaluation and explanation of why the possible alternative approaches were rejected. These were summarized within the draft Development Management Plan which went out to consultation during April and May 2013.

4.2 The matrix introduces the policy title, lists all options which were considered as a Development Management Policy approach, assesses each possible option against the list of objectives which appear in Table 1 to arrive at a score. Underneath the policy option box is a synopsis of what the policy should achieve, the Council's preferred option is then outlined together with a comment on the SA scoring, and reasons for rejection of alternative options. This approach is followed for each of the 22 draft Policies. Please note that the options relate to the initial direction considered for each policy with the preferred option set out in the Draft Development Management Plan being developed from that initial option.

4.3 Table 2 below provides a key as to how each predicted effect was evaluated against the SA objectives.

Table 2: Sustainability Appraisal Effects

Type of Effect	
++	Likely to have significant positive effects
+	Likely to have positive effects
0	Neutral
-	Likely to have negative effects
--	Likely to have significant negative effects

DM1: Presumption in favour of sustainable development

Option 1 Include a policy that sets out a presumption in favour of sustainable development and how it will be applied when considering proposals in the borough.																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+

What the preferred option must do

The Local Plan policy position must follow the stance of the National Planning Policy Framework. Policies within the Local Plan should combine to deliver a positive approach in favour of sustainable development. Policy DM1 sets out this clear presumption and how it will be applied when considering development proposals against other Development Management policies on specific issues and those in the Local Plan as a whole. It emphasises the importance of working with applicants to find solutions in order to deliver high quality, sustainable development in Elmbridge. It will secure development that improves the economy and environmental conditions in the area, as well as the sustainability of communities. The policy is compatible with all of the SA Objectives as sustainable development principles will seek to mitigate negative impacts through the sequential approach to the location of new development, and mitigation measures where development is required to take place.

Preferred Option

The preferred option is Option 1, for the reasons set out above.

SA Comment

This policy follows the national position and will ensure sustainable development, in conjunction with other policies in the Council's Local Plan which will be applicable upon receipt of a planning application.

Why were the other(s) rejected?

No alternative options were considered for this policy.

DM2 Green Belt (development of new buildings)

Option 1 Include a policy that provides further detail and clarifies national policy.																			Option 2 Rely on the NPPF for managing proposals in the Green Belt, rather than a Development Management policy																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
-	0	0	0	+	+	+	0	0	0	0	+	+	+	0	-	-	0	0	-	0	0	0	+	+	+	0	0	0	0	+	0	+	0	-	-	0	0

What the preferred option must do

The policy must take a detailed local approach to managing development in the Green Belt. For example, some development is not 'inappropriate', and is either limited to ensure that land is kept open or a use that is consistent with the purposes of Green Belt. Examples of such developments will include limited development to support agricultural uses, forestry or outdoor recreation. The Council therefore considers that a Development Management policy must be able to offer more detail, clarity and respond to local context rather than solely rely on the default national policy position.

Preferred Option

The Council's preferred option is Option 1. This policy direction will provide the greater detail to enable full assessment of local circumstances and situations which may permit limited development within the Green Belt in some circumstances - but simultaneously will enable wholly inappropriate applications to be rejected.

SA Comments

Three negative outcomes were recorded under assessment. However, the provision of housing will not be hindered by the Council's preferred option (Objective 1), and policy continues to protect the Green Belt from inappropriate development. While the policy protects the openness of the Green Belt, there could be some scope to convert existing redundant buildings to developments. This will be limited by the policy. This limitation is due to minimal scope for the expansion of such properties in the future as prospective businesses grow. However, protecting the Green Belt and focussing development on the main settlements means that development becomes more accessible by a greater range of transport modes, and could potentially ease car use. It also makes good use of previously developed land in the Borough, ensures that contaminated land will be remediated, and maintains public access to a wide range of existing leisure and recreation activities in the

countryside. Protecting Green Belt will also protect biodiversity and wildlife habitat, as well as protect listed buildings and conservation areas within or adjacent to the Green Belt.

Why were the other option(s) rejected?

Option 2 was rejected as a local Development Management policy is required in the Plan to offer the detail which will be necessary to maintain the openness of the Green Belt. Option 2 also did not score as highly as for Objective 13 'To protect, enhance, the natural archaeological historic and cultural assets' as there was greater potential for inappropriate development unless additional clarity was provided. Further clarity would allow the Council to ensure that local circumstances are taken into account and that the Development Management Plan enables decision makers to better ensure Green Belt in Elmbridge continues to serve the purpose outlined in the NPPF.

Furthermore, Core Strategy policies CS1 and CS14 outlines the role of the Green Belt as a multi-functional resource, state the Council's intentions to protect the Green Belt, resist inappropriate development, and improve opportunities for formal and informal outdoor recreation. Detailed criteria will therefore be needed to set out the Council's approach to deliver the above.

DM3: Green Belt (development of existing buildings)

<p>Option 1 Include a policy that sets out a maximum quantum of development to represent a 'disproportionate addition' (30%) and 'materially larger' (10%) and further clarity on other types of development for the purposes of applying national policy</p>																			<p>Option 2 Include a policy, but without specifying a maximum quantum of development to represent a 'disproportionate addition' or 'materially larger'</p>																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
-	0	0	0	+	+	+	0	0	0	0	+	+	+	0	-	-	0	0	-	0	0	0	+	+	+	0	0	0	0	+	0	+	0	-	-	0	0
<p>Option 3 Include a policy but using a different quantum to represent a 'disproportionate addition' or 'materially larger'</p>																			<p>Option 4 Include a short policy without significant detail and rely on national policy</p>																		



1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
-	0	0	0	+	+	+	0	0	0	0	+	0	+	0	-	-	0	0	-	0	0	0	+	+	+	0	0	0	0	+	0	+	0	-	-	0	0

What the preferred option must do

The preferred option must take a local approach to managing development in the Green Belt. This is considered to offer more detail, clarity and will be more responsive to the local context than reliance on the NPPF. This will also allow for greater certainty and clarity for applicants. The Green Belt is a key determinant of settlement and development patterns in Elmbridge, which will continue into the future. Core Strategy policies CS1 and CS14 already outline the Council’s intentions to protect the Green Belt and resist inappropriate developments.

Preferred Option

The Council’s preferred policy option is Option 1. This option builds on the national position by setting criteria that are detailed enough to provide clarity on local issues. It clearly specifies a footprint and volume limit for extensions to existing property as a percentage set against the floorspace of the original building(s), beyond which will be considered unacceptable. The NPPF sets out that that extensions cannot be ‘disproportionate’ and enlargements cannot be ‘materially larger’ than the original building. The policy simply quantifies what these terms mean by setting a figure to aid decision-making.

SA Comment

Three negative outcomes were recorded under assessment. However, the provision of housing will not be hindered by the Council’s preferred option, whilst ensuring that the purposes of the Green Belt as set out in the NPPF are maintained. While the policy protects the openness of the Green Belt, the scope to extend existing properties in the Green Belt will be limited by the policy to prevent inappropriate development.

As is the case with the preferred policy approach for DM2, protecting the Green Belt and focussing development on the main settlements means that development can become more accessible by a greater range of transport modes, and could potentially ease car use. The preferred option also makes good use of previously developed land in the borough, ensures that contaminated land will be remediated, and maintains public access to a wide range of existing leisure and recreation activities in the countryside. Protecting Green Belt will also protect biodiversity and wildlife habitat, as well as listed buildings and conservation areas which are within or adjacent to the Green Belt.



Why were the other option(s) rejected?

Option 2 was rejected as the Council has not historically specified an amount of development which may be acceptable. However, the lack of a maximum quantum figure has led to much frustration and time wasted on assessing what actually constitutes an ‘appropriate’ figure rather than concentrating on other issues such as design. Option 2 did not score as favourably as Option 1.

Option 3 was rejected as in practice it could risk higher volumes of land being lost to extensions. Option 3 scored very similarly to Option 2, in that the use of a different quantum to represent ‘materially larger’ or a ‘disproportionate addition’ would not offer as much protection as the Council’s preferred option.

Option 4 was rejected as relying on the national position means it is unable to acknowledge local matters where these have relevance to policy. Although the Council’s strategic Green Belt policy position is already established through policies CS1 and CS14 of the Core Strategy reliance on the NPPF could not provide the further clarity and detail required to ‘drill down’ from strategic policies and set the additional criteria which will be required to assess and determine the suitability of planning applications at a local level. For this reason, Option 4 scored lower than Option 1.

DM4 Horse-related uses and development

Option 1 Include a policy to manage this specific type of development to provide greater detail than national policy																			Option 2 Rely on national policy and other local policy and guidance to manage this type of development																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	+	0	0	+	0	0	0	0	0	0	+	+	0	0	+	+	0	0	0	0	0	0	+	0	0	0	0	0	0	+	+	0	0	+	+	0	0

What the preferred option must do

It is considered that a local development management policy is necessary given the popularity of equestrian activity in the borough, in order to provide detail for assessing applications. This will ensure that this type of development is in the most appropriate location, including in relation to highway safety. The NPPF only references outdoor recreation and National Trails - including horse riding - rather than considering equestrian uses specifically.



Preferred option

The Council's preferred option is Option 1. This enables the creation of a detailed, criteria-based policy to help manage such forms of development.

SA Comment

The preferred option helps to maintain public access to a range of recreation and leisure activities, and takes account of the popularity of equestrian activity. Although horse riding is expensive and therefore not available to every Elmbridge resident it is a popular sport within the Borough and other areas of Surrey. This policy will help to increase the number of equine facilities and therefore improve health and wellbeing for those taking part in such activities, as well as helping to give more of the community an opportunity to access the countryside. Equine related business can also provide job opportunities for some parts of the community. The preferred option also protects biodiversity, and provides an opportunity to develop the existing green infrastructure network. It can also ensure that any new sites or developments associated with existing uses are of an appropriate scale, and do not have a detrimental impact on the landscape.

Why were the other option(s) rejected?

Option 2 was rejected as it is considered that the popularity of equestrian activities within the Borough would not be given adequate reflection by relying on national policy. Subsequently when Option 2 was assessed against Objective and 5 it scores lower than the preferred option.

When designing a scheme, an applicant must demonstrate that the scale of development, quality of design, landscaping and materials will enhance the visual amenity of the area. There are other factors which will influence the location of buildings within a given site, such as the need for natural surveillance e.g. the overlooking of such as car parking spaces and general security issues. Reliance on national policy would not be able to provide the detailed local criteria to assess the suitability, or otherwise, of planning applications. Furthermore, the Council's Environmental Health and Licensing department is the body responsible for issuing licenses to riding centres, so with a local planning Development Management policy in place, the Council will also be able to offer a collaborative approach to ensuring the aims of the policy are achieved. This will also improve the 'quality' of equestrian sites, in line with the Core Strategy.

DM5: Open Space and Views

Option 1 Include a policy that supports the protection of open spaces and to build on the national policy provisions for managing Local Green Space																			Option 2 Rely on the NPPF for managing proposals that affect open space																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
-	+	0	+	+	+	0	0	0	0	0	+	+	0	0	-	-	0	0	-	+	0	+	+	+	0	0	0	0	0	+	0	0	0	-	-	0	0

What the preferred option must do

There is a need for a Development Management policy to support the identification of open spaces, which will be included on the Policies Map. Open spaces within Elmbridge are essential to the character of the area. They contribute to the high landscape quality and the network of green infrastructure. The policy must also resist development on open space unless it leads to a qualitative improvement to the open spaces.

Preferred Option

The Council's preferred option is Option 1. The NPPF requires that policies on Local Green Space are consistent with Green Belt policy, which, in turn, implies that more detail will be needed at a local level to manage development affected by this designation.

SA Comment

Although assessment of the preferred option showed negative findings against three objectives, the provision of housing will not be hindered by the Council's preferred option, and any decisions about development within the Green Belt or on open space would need to be fully justified. The policy direction seeks to protect open space from inappropriate development which has a positive effect on a number of objectives, in particular promoting a healthy lifestyle and helping to minimise flood risk. Protecting open space from inappropriate development will also help to make good use of previously developed land and existing buildings by encouraging their re-use.

Why were the other option(s) rejected?

Option 2 was rejected as it would not allow for satisfactory management of local open spaces. The Borough's open spaces are very important to local people, who enjoy the visual benefits, wildlife habitats and the recreation function provided and they must be suitably managed. The

lack of protection is reflected in a lower score than was achieved by the Council’s preferred option against Objective 13. Planning policies are required to be based on ‘robust and up-to-date assessments of the need for new open space, sport and recreation facilities’ (NPPF para 73). The reference to Local Green Space policy in Paras 76-78 of the NPPF requires that a local policy must be consistent with policy for Green Belts. Para 81 of the NPPF sets out Green Belt policy and when taken together, the NPPF paragraphs imply that more localised detail will be required for satisfactory management of the Borough’s open spaces which will not be provided by the approach of Option 2.

DM6: Nature Conservation and Biodiversity

Option 1 Include a policy that responds to issues with specific relevance to the Borough and provides additional detail to support the Core Strategy Policy																			Option 2 Rely on the NPPF for managing proposals that affect biodiversity and nature conservation rather than a Development Management policy																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	+	0	+	0	+	0	0	0	0	0	+	+	0	0	0	0	0	0	0	+	0	0	0	+	0	0	0	0	0	0	+	0	0	0	0	0	0

What the preferred option must do

The preferred option must safeguard recognised areas of importance for nature conservation, building upon Core Strategy policy CS15 which states that a Development Management policy will be produced against which proposals will be judged for any development affecting regional or local sites of biodiversity significance. A local approach is considered to respond to issues with specific relevance to Elmbridge and deal more effectively with areas of concern identified in the Scoping Report.

Preferred Option

The Council’s preferred option is Option 1. Elmbridge contains a rich network of green infrastructure that supports biodiversity, and this policy provides detailed criteria to apply to nationally and locally designated sites. Under this approach, biodiversity and green infrastructure will remain protected but a framework is also in place.

SA Comment



The preferred option will help to protect wildlife habitat and woodlands, which can also bring benefits for the health and well-being of the population. When there is a significantly adverse impact as a result of development works, the policy seeks mitigation measures to compensate for the negative impacts. Directing the bulk of development to the urban settlements can help to conserve existing wildlife habitats and protect the wider landscape. Protecting wildlife habitat can also, in turn, help to conserve and enhance the borough's landscape. Additionally, maintaining the openness and undeveloped nature of the countryside could also help in mitigating flood risk.

Why were the other option(s) rejected?

Although Option 2 was rejected, it would still meet the policy objective of responding to borough needs and supporting the Core Strategy to some extent. However, it was considered that the inclusion of a Development Management policy provides the opportunity to address any local biodiversity issues (as identified by the Sustainability Appraisal Scoping Report) in greater detail than relying on the NPPF. The importance of the natural environment in Elmbridge is reflected in the importance of the Green Infrastructure network set out in policy CS14 of the Core Strategy. Option 2 also scored less favourably against Objective 12 than the preferred option.

DM7: Recreational Uses of Waterways

Option 1 Have no Development Management policy on recreational uses of waterways and rely on Core Strategy CS12 - The River Thames Corridor and its tributaries.																			Option 2 Include a detailed criteria-based policy which deals with this specific type of development proposal																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0	0	+	0	+	+	+	+	+	0	0	0	0

What the preferred option must do

The preferred policy approach will support the positive use of the water as a recreational asset, which helps maintain the health and wellbeing of the Borough's communities. This policy approach should have a positive effect on many of the SA objectives by encouraging people to walk, linking communities with the environment and generally through encouragement of healthier lifestyles.

Preferred option

The Council's preferred option is Option 2. The preferred option will help improve accessibility to the waterways, encourage more sustainable methods of transport, and protect the natural environment. It scores positively against the other environmental objectives as it seeks to mitigate the pollution that can occur from some recreational pursuits. The Council aims to encourage appropriate active and passive recreational uses while minimizing conflicts between users, protecting the natural environment and retaining public access to the riverside.

SA Comment

The preferred option promotes opportunities to use the Borough's waterways. The allied towpaths can also help to promote accessibility to travel around the borough by cycling and walking encouraging healthier lifestyles. This can also bring benefits for biodiversity and general landscape protection. It also makes good use of land by resisting the loss of existing facilities and encouraging new development which can contribute to recreational use of the rivers, and through the encouragement of further permanent residential moorings and houseboats, which can, for some lifestyles, provide an alternative and relatively affordable form of housing.

Why were the other option(s) rejected?

Option 1 was rejected as the NPPF does not contain specific policies on recreational uses of the waterways, and as it is a nationally applicable framework it is not able to provide sufficiently detailed local guidance for Elmbridge. Although Core Strategy policy CS12 deals with the strategic role of the Borough's rivers and tributaries, as a strategic policy direction it does not and cannot provide the detail required for the determination of planning applications.

Additionally, as these environments and pursuits are of local importance, it was considered important to have a Development Management policy allowing access to the waterways, yet protecting their natural environments. The alternative option resulted in less positive scoring, as the Core Strategy policy is less detailed.

DM8: Social and Community Facilities

Option 1 Include a policy that provides further detail for managing development to build on the Core Strategy policy	Option 2 Rely on the Framework and other policies on design and amenity etc for managing proposals for social and community facilities rather than a specific Development Management policy
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1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
0	+	+	0	+	+	0	0	0	0	0	0	++	+	0	+	+	0	0	0	+	+	0	+	0	0	0	0	0	0	0	0	+	+	0	+	+	0	0

What the preferred option must do

The Council recognises the important role that social and community infrastructure has in supporting the needs of people who live or work in the Borough and the additional pressure as the population grows and development takes place. The strategic approach to social and community infrastructure, including its loss, is set out in Policy CS16 of the Core Strategy. A cohesive and local approach to the policy is considered to emphasise the importance Elmbridge places on these facilities and sets out our aims for collaboration between service providers. Detailed criteria must be set, using CS16 as a starting point.

Preferred option

The Council's preferred option is Option 1. This will ensure that new facilities are sustainably located, and will make good use of previously developed sites by enabling the redevelopment of redundant facilities where it is appropriate.

SA Comment

The preferred option acknowledges the importance of protecting the existing facilities and providing new facilities to help improve residents' quality of life. The policy helps retain community, social and educational facilities, building on Core Strategy policy CS16 and will therefore contribute to social cohesion and improved education. Community facilities can help to reduce social exclusion so their potential loss would have a detrimental effect. It also ensures that new facilities will be accessible, of high quality design and will not have detrimental effects on traffic flows.

Why were the other option(s) rejected?

Option 2 was rejected as a Development Management policy must go further than the NPPF in promoting mixed-use, shared, flexible and adaptable buildings and spaces that meet the needs of the community and encouraging collaboration between service providers, the community and key partners. The Core Strategy sets out a policy approach to ensure financial contributions from new development for new facilities, and the establishment of infrastructure and service programmes. Furthermore it seeks to locate new facilities close to where the need arises. However, more localised detail is required to set out formal criteria by which the suitability or otherwise of development proposals can be assessed against.



Although both options scored well, Option 2 scores less favourably against Objective 6 due to the reliance on the NPPF, whose policy content is applicable across the whole of England and as such cannot provide the required local context.

DM 9 Housing

Option 1 Do not allow any additional housing development on existing gardens																			Option 2 Use an alternative measure or method for setting a threshold of applicability for housing type and mix																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
-	0	0	0	+	+	0	0	0	0	0	0	0	+	0	+	+	0	0	+	+	0	0	+	0	0	0	0	0	0	0	0	+	0	+	+	0	0

Option 3 Do not apply minimum internal space standards for housing development																			Option 4 Include a policy that sets out a threshold for the applicability of requiring a housing type and mix, loss of housing, minimum internal space standards, the Council's approach to development of garden land and ancillary accommodation																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	-	0	0	+	+	0	0	0	0	0	0	0	+	0	+	+	0	0	+	+	0	0	+	+	0	0	0	0	0	0	+	+	0	+	+	0	0

What the preferred option must do

The detailed DM policy must set criteria to give greater certainty relating to the types of housing being brought forward and other issues, such as the Council's approach to the development of garden land. The Core Strategy aims to promote housing schemes in the urban area in the most sustainable locations. This means making efficient use of land, increasing densities where local character allows and maximising opportunities in town centres. Without careful planning, this can have the result of reducing the quality of accommodation in designing viable, high density schemes. Residential schemes that do not achieve acceptable living standards are often symptomatic of overdevelopment and poor design, an inappropriate location for housing or a combination of these.

In considering proposals for new development, the Council proposed applying minimum internal space standards. Particularly when the housing market is buoyant, the Borough can experience pressure on even the smallest of sites for residential units, such as the conversion of storerooms behind or above retail premises or the subdivision of larger units to form smaller flats or bedsits. Although the creation of smaller units is often welcomed, there is also a responsibility to ensure that such housing is not excessively small to result in a poor standard of living for its occupants.

In Elmbridge, 'backland' development has made a meaningful contribution to the supply of housing as an efficient use of land, particularly large and underused gardens, and in some locations has become established as characteristic of the area. As such, the Council is not seeking to resist all development of residential gardens, however, housing development of this type needs very careful consideration.

Preferred Option

The Council's preferred option is Option 4. This provides the most comprehensive method of addressing the key concerns relating to housing delivery in the borough. Elmbridge has the highest average house values by Local Authority in the UK excluding London, so the preferred option will also ensure that inroads are made in respect of addressing housing need. The preferred option will also ensure that previously-developed land is reused in an efficient and effective way.

SA Comment

The demand for reasonably priced housing is high. However, the provision of housing and affordable housing will help to reduce housing needs in the borough. It is considered that the preferred option will also help to improve health and well-being by enabling more people to live in good quality homes, as well as aiding the re-use of previously developed land. This will ensure that development will be closer to existing transport infrastructure. It will also ensure that permission can be refused for poor quality proposals which have a detrimental effect on the character of an area. As any increase in the number of homes can result in increases to traffic, air and light pollution it is also recommended that new housing developments should be assessed against other key sustainability principles as to ensure that negative impacts can be mitigated accordingly, including requiring high quality design and energy standards from new housing.

Why were the other options rejected?

Option 1 was rejected as applying a blanket restriction on all residential development on garden land would affect the number of potential housing sites and would prevent the Council making an individual assessment of the merits of each proposal. Early engagement with the

community on this issue has suggested the local people are not necessarily resistant to 'backland' development provided that it is well-designed and respects the character of the area.

Option 2 was rejected as, if a number of units were to be specified instead, it was considered that this could have the result of reducing the net increase of housing proposed on a site if applicants seek to avoid the policy requirements – potentially further delivering larger homes which may result in exacerbating local housing needs. A figure of 0.3 hectares (Ha) was proposed in the draft policy (following the parameters of option 1), because 0.3Ha equates to sites that will be expected to accommodate more than 10 units (i.e. 'major' housing developments) based on a minimum density of 30 dwellings per hectare.

Option 3 was rejected because in the past the Council has found it difficult to resist the creation of excessively small flats and bedsits without a policy specifying a minimum space standard. The preferred option offers the opportunity to address this issue.

DM10 Employment

Option 1 Include a policy that reinforces the Core Strategy policy and includes detail on types of development such as live-work units and working from a dwelling																			Option 2 Rely on the NPPF and the Core Strategy employment policy rather than a specific Development Management policy																			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
0	0	0	0	+	+	0	+	+	0	0	0	0	+	0	+	+	0	0	0	0	0	0	+	+	0	+	0	0	0	0	0	0	+	0	+	+	0	0

What the preferred option must do

The Development Management policy must provide additional detail and criteria for managing and assessing development proposals in order to facilitate sustainable economic growth over and above the level of detail in the Core Strategy, and to reinforce the national policy objectives in the NPPF. A key element of this policy is to provide and support flexibility for employment uses and between these uses and others, in order to respond to changes in the market.

The Council is committed to delivering growth in the Borough and the Local Plan is a key tool that plans positively to accommodate employment growth, promote efficient use of land in the urban area and support vibrant town and village centres, whilst taking account of their respective roles. While the Council acknowledges that the current state of the economy has placed pressure on existing vacant employment land, it is important that any losses are resisted for the long term benefit of the economy, unless the change of use can be justified and clearly shown to be surplus to requirements through marketing evidence.

The overall aim of the policy is to promote economic growth within the plan area, which has the potential to increase vehicle movements and associated negative environmental impacts, such as traffic congestion. However, some built-in mitigation is provided within other policies by requirements directing retail, leisure, and other main town centre uses to the defined settlements.

Preferred Option

The Council's preferred option is Option 1. It is considered that this approach will provide the criteria necessary for determination of applications.

SA Comment

The preferred option will enable reuse of previously-developed sites and buildings, providing more local employment opportunities thus potentially enabling people to live closer to their workplace and reducing the need to travel, support economic growth and accessibility to goods and services.

Why were the other option(s) rejected?

Option 2 was rejected as the NPPF and the Core Strategy do not contain detailed policies on the issues covered in the preferred option, specifically on live-work units and working from a dwelling. A Development Management policy taking account of localised issues can support the strategic aims and provide more detail for the day-to-day assessment of proposals, helping to prevent unnecessary loss of sites. Encouraging mixed-use developments would help to benefit the local economy. Promoting mixed use developments on employment land was considered to be one of the most sustainable approaches for employment land and surplus employment land. This could bring some environmental and social benefits, for example enabling the provision of housing on the upper floors of mixed use development with B-class employment uses on the ground floor. Such an approach can increase scheme viability, ultimately attracting further investment to the borough and creating local job opportunities. Relying on national policy alone may see good quality employment sites lost to other uses.

DM11 Heritage

Option 1																			Option 2																			
Include a detailed policy that covers the range of heritage assets in the Borough and how proposals affecting them will be managed																			Rely on the Core Strategy and national policy																			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
0	0	0	0	0	+	0	+	+	0	0	0	++	0	+	0	0	+	0	0	0	0	0	0	0	+	0	0	0	0	0	0	+	0	+	0	0	+	0

What the preferred option must do

This policy aims to ensure that applicants understand that new development needs to respond to local character and history and integrate into the natural, built and historic environment. It encourages high quality development that reflects the identity of local surroundings and materials, while not preventing appropriate innovation. Environmental improvements and adaptation to climate change should be encouraged, but sensitive design and siting is required to prevent any undue harm to the historic asset. Some change of use and conversion applications can bring a heritage asset back to life and enhance its vitality, appearance and setting.

Preferred option

The Council's preferred option is Option 1. It is considered that the proposed policy approach will have a positive effect on local heritage and the Borough, as long as use of the policy does not unnecessarily stop development from proceeding. A policy approach that aims to restore and re-use all buildings (not just listed) rather than proposing complete site redevelopment will offer the most sustainable approach to ensure the protection, conservation and enhancement of the borough's heritage assets.

SA Comment

Adapting to the impacts of climate change may lead to new flood defences, rainwater disposal systems and alterations in agricultural and forestry practices that may lead to changes that could pose a threat to buried archaeological sites, and traditional and historic landscapes. The

preferred option will ensure that new development is sympathetic in nature and performs well against the relevant sustainability objectives especially relating to the visual character, appearance of historic and cultural assets and their settings.

Why were the other option(s) rejected?

Option 2 was rejected as the NPPF does not contain the sufficient detail required to determine applications on a day-to-day basis. Whilst the importance and the continued protection of the historic environment is an integral part of the Core Strategy, again there is no specific heritage policy that sets out a strategy or policy for the conservation and enjoyment of the Borough’s historic environment. This means that there would be a potential policy gap if Option 2 had been favoured. As such, Option 2 cannot take local matters into account so scored less favourably.

DM12 Riverside development and uses

Option 1 Rely on Core Strategy Policy CS12 - The River Thames Corridor and its tributaries, design guidance in the Design and Character SPD and future Green Infrastructure Strategy																			Option 2 Include a detailed policy for managing this type of development to support the Core Strategy policy																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	0	0	+	+	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	+	0	+	+	0	0	0	0	0	+	+	+	+	+	0	0	0	0

What the preferred option must do

Policy CS12 of the Core Strategy sets out the strategic policy on the River Thames Corridor and its tributaries. It states that detailed planning guidance will be included in the Development Management and Site Allocations documents. This policy must therefore set detailed criteria, building upon CS12. Many of the reservoirs and waterways in Elmbridge are of national and international biodiversity significance with SSSI, Ramsar and SPA designations. The Design and Character SPD provides guidance for the design of new riverside development and this policy will also provide the link between the strategic policy and the guidance featured in the Design and Character SPD relating to riverside development.

Preferred option

The Council's preferred option is Option 2, which scored highest under SA assessment. The Council considers that a co-ordinated policy framework should be adopted towards the planning of all rivers and waterways in order to maximise the benefits for local people and to enhance nature conservation interests. Option 2 allows for more detailed policy criteria to be set, and takes full account of the local environment.

SA Comment

Enabling some riverside development may see improvements to riverside towpaths, which can promote walking and cycling bringing health and well-being benefits. Sequential and/or exception tests will need to be applied where necessary to ensure that any development is suitable when considered against the level of flood risk present. Some flood alleviation measures may include the use of green spaces, bringing potential benefits to biodiversity and wildlife.

Why were the other option(s) rejected?

Option 2 was rejected as the SPD does not include cross cutting issues such as the retention of uses, biodiversity, public access and climate change. The Council's Green Infrastructure Strategy will cover blue infrastructure but would not be able to include the policy required for making decisions on day-to-day planning applications.

DM13 Evening Economy

Option 1																			Option 2																		
Include a policy that supports the growth of the evening economy whilst ensuring adequate protections are in place for residential amenity and highway safety																			Rely on the NPPF and other policies on amenity and access etc for managing proposals for uses associated with the evening economy rather than a specific Development Management policy.																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	0	+	0	+	+	0	0	+	0	0	0	0	+	0	+	+	0	0	0	0	+	0	+	+	0	0	0	0	0	0	0	+	0	+	+	0	0



What the preferred option must do

Elmbridge has a thriving evening economy due to the extensive variety of restaurants, bars, pubs and takeaways, all of which are underpinned by numerous taxi companies. Some areas of the borough have a higher concentration of evening economy uses due to adjacent venues which attract people into the town centres, for example the well-known Sandown Park racecourse in Esher. Therefore evening economy activities have an important role in maintaining growth within the town centres and as part of mixed-use development schemes, although it is noted that some activities may be 'unneighbourly' in residential areas, resulting in noise, disturbance and odour. The policy should set detailed criteria which will enable managed growth in the evening economy sector, acknowledging both the positive aspects (e.g. in terms of entry-level job creation) and the negative if not managed correctly (e.g. increased noise, odour, litter, risk of crime and the fear of crime), especially when restaurants and bars are close to residential areas).

Preferred option

The Council's preferred option is Option 1. A local development management policy will enable the Council to carefully consider such applications and to work with local businesses to assess whether any potential harmful effects of development could be mitigated through factors such as design solutions for extraction systems, orientation of new buildings, conditions on opening times or controls on outdoor seating. A local Development Management policy also has the scope to ensure that any proposals which do not incorporate mitigation measures against the negative effects of development on local residents, character of the area or highway safety, can be refused.

SA Comment

Enabling the expansion of this sector can help to ensure that buildings are reused; potentially meaning that residents do not have to travel as frequently for leisure needs. The sector can also be a key creator of entry-level jobs, providing employment both within the Borough and across neighbouring areas. There are potential negative impacts arising from the sector, such as litter, noise, disturbance and an increase in crime or anti-social behaviour, however the preferred policy option would be able to ensure these are mitigated against by the use of conditions which would be set out in the policy.

Why were the other option(s) rejected?

Option 2 was rejected as the NPPF does not provide specific policy against which to assess proposals on a day-to-day basis. Option 2 scored less favourably against the objective to reduce noise pollution. The evening economy is key to sustaining the vitality and viability of town and village centres and it is considered that Option 1 allows local concerns to be addressed whilst maintain support for the evening economy. Therefore Option is considered to be better placed to enable that to happen.

DM14 Advertisements, Shopfronts and Signage

Option 1 Include a detailed policy on the design of advertisements and shopfronts to take account of local character																			Option 2 Rely on national policy and other local guidance documents.																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	0	0	0	+	0	0	0	0	+	0	+	+	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

What the preferred option must do

The Development Management policy would set criteria outlining the locations where advertisements and other types of signage may be acceptable. Elmbridge has a number of attractive town and village centres as well as local parades of shops. The environmental quality of these shopping areas is of fundamental importance to their economic health and viability. It is important that the Borough’s town and village centres attract visitors and shoppers. Maintaining a high quality environment will encourage footfall and custom, ensuring local economic growth.

Well-designed advertising displays, signage and shopfronts add to the vitality of the town and village centre and provide important information for the shopper or visitor. It is important that the Council supports the economic development of these centres and one way of doing this is through the provision of high quality advertisements, shopfronts and signage in suitable locations.

Preferred option

The Council’s preferred option is Option 1, which performed significantly better than the alternative option. A local detailed policy will enable greater control over issues such as light pollution, and conservation of local heritage assets. Minimising light pollution also will ensure that disturbance to wildlife is lessened.



SA Comment

The preferred option could potentially have a negative effect on the character of the Borough without proper design measures in place; however a criteria-based Development Management policy is able to ensure that unnecessary light pollution can be averted and that advertisements do not unnecessarily detract from the historic environment or disturb wildlife. The preferred option scores more highly for the reason that it can include criteria on design and location of advertisements and other signage.

Why were the other option(s) rejected?

Option 2 was rejected as national policy does not provide any detailed policy on the design of advertisements and shopfronts, only general advice on their location. The NPPF highlights the effect that poorly placed advertisements may have on the built and natural environment, which in turn has a negative effect on the character of Elmbridge. Although local guidance exists regarding shopfronts in conservation areas, this is not available for other areas of the Borough. This would not provide sufficient detail to reach a satisfactory decision at local level taking into account local character issues.

DM15 Telecommunications

Option 1 Include a policy that is locally specific to the Borough and highlights sensitive locations where development should be avoided																			Option 2 Rely on national policy																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	0	0	0	+	0	0	0	0	0	0	0	+	+	0	+	+	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	+	0	+	+	0	0

What the preferred option must do

As there is a demand and need for high quality communications infrastructure in the Borough to support the local economy it is considered that a criteria-based Development Management policy is necessary to provide the borough’s large self-employed workforce with the technology that they require to operate within the borough. The policy strengthens the Council’s policy approach by providing more detailed criteria to assess applications.



As such, DM15 provides further certainty to developers helping to ensure that public and business demand for communication infrastructure will be met. The policy ensures that such development is normally accommodated on shared sites, and will only occur elsewhere where sharing would have unacceptable visual impacts. It also affords protection to key heritage locations such as conservation areas and listed buildings, or the Green Belt, sites of Nature Conservation Importance and local designations.

Preferred option

The Council's preferred option is Option 1. This will enable the Council's policy approach to be strengthened by providing more detailed criteria to assess applications. The NPPF requires local plans to support the expansion of electronic communications networks including telecommunication and high speed broadband, to keep the number of telecoms masts to a minimum, and where appropriate to require that new masts are sympathetically designed. This suggests that local criteria-based policies need to be in place to set out locations where masts may be suitable, and places where installations may have a detrimental impact on amenity.

SA Comment

The preferred option will outline the local criteria to be met for the installation of telecommunications equipment. Enabling the provision of telecommunications equipment can help in reducing the need to travel to a fixed workplace by enabling people to work from home more often, with the benefits this can have on reducing pressure on transport infrastructure. This can also make it easier for people to search for work, and indirectly create jobs through the installation of further equipment by telecommunications and other media companies.

Why were the other option(s) rejected?

Option 2 was rejected as the NPPF cannot highlight the number of sensitive local areas where development should be avoided. The Council receives high level of representations from the community when applications are submitted, which demonstrates strong local opinion on this type of development. The NPPF requires local plans to support the expansion of electronic communications networks including telecommunication and high speed broadband and to keep the number of telecoms masts to a minimum, it does not say how this should be achieved, which invariably necessitates a further local policy. It is considered that reliance on national policy only could provide outline guidance on telecommunications development, but would inevitably result in some negative impacts on landscape and townscape. As a result, Option 2 also scored less favourably against Objective 13.

DM16 Design and Amenity

Option 1 Include a policy that provides the link between the overarching design policy in the Core Strategy and the detailed guidance in the Design & Character SPD																			Option 2 Rely on national policy, the Core Strategy and the Design and Character SPD																			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	
0	+	+	+	+	+	0	+	+	+	+	+	++	+	+	0	0	+	+	0	+	+	+	+	+	0	+	+	+	+	+	+	+	+	+	0	0	+	+

What the preferred option must do

It is considered essential to have a locally specific policy on design and amenity. Most development proposals which will be submitted to the Council will have to take account of this policy. As design and character is such an important factor when considering development in Elmbridge it is critical that the Plan includes a detailed policy allowing officers to make recommendations on a daily basis. The preferred option will also provide a link to the guidance featured in the Design and Character SPD and reference should be made to consult the SPD within the policy.

Preferred option

The Council's preferred option is Option 1. This will enable creation of a detailed, criteria-based policy to take account of the issues raised above. Although both options scored positively against all but four objectives, the preferred option scored higher when assessed against SA objective 13 'To conserve and enhance the natural and historic environments and cultural assets'.

SA Comment

One of the key objectives of the Core Strategy is to protect the unique character of the Borough. The preferred approach must ensure that new development integrates well with the existing built environment, in terms of height and appearance, and is accessible by a range of transport modes. It will protect wildlife habitats, prevent unnecessary light and noise pollution, make good use of previously developed sites and help to contribute to issues facing the borough such as the uncertain impacts of a changing climate. Local detail is necessary.

Why were the other option(s) rejected?

Option 2 was rejected as national policy and the Core Strategy do not go into detail especially with regard to amenity issues on a site-specific basis. Understanding character is crucial to the success of a development and a reliance on national policy alone will be unable to do this. The policy requires that applicants take account of the character assessment companion guide (part of the Design and Character SPD) as this will ensure the development is in keeping with, and will enhance the unique character of the Borough. This provides the applicant with the knowledge of the local characteristics featured in every sub area across the 8 urban settlements of Elmbridge.

DM17 Mixed Uses

Option 1 Include a policy that provides the link between the overarching design policy in the Core Strategy and the detailed guidance in the Design & Character SPD																			Option 2 Rely on national policy, the Core Strategy and the Design and Character SPD																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
+	+	+	0	+	+	0	+	+	0	0	0	0	+	0	+	+	0	0	+	+	+	0	+	+	0	+	0	0	0	0	0	+	0	+	+	0	0

What the preferred option must do

The policy must provide additional detail to support Core Strategy policy CS18 - Town Centre Uses, which includes the promotion of higher density mixed use schemes in town and district centres. It is acknowledged that some uses within the same site or building may be less compatible than others, therefore careful consideration needs to be given to the design, location and access arrangements of mixed use developments so that any negative effects, particularly on future residents, can be avoided. The policy should also recognise that mixed use development is commonplace in town and district centres and that the diversity of uses and the character and vitality of the area can be eroded by large, single use buildings.

Preferred option

The Council's preferred option is Option 1. This will provide the detailed criteria-based policy which will be required to link together different aspects of the Local Plan, together with an understanding of local issues.

SA Comment

Encouraging mixed use developments can help to reduce the need to travel, via enabling greater access to goods and services locally. This results in positive scoring against a number of objectives. They could also support economic growth via enabling the provision of new employment floorspace, and, subsequently, create further job opportunities.

Why were the other option(s) rejected?

Option 2 was rejected as the NPPF and the Core Strategy do not contain detailed policies on the issues arising in the preferred option, specifically on how mixed use development should be designed and located. Neither would the fallback position of relying on the NPPF and the Core Strategy offer any detailed policy or criteria for assessing the compatibility of uses within a development. A Development Management policy can support the strategic aims of encouraging mixed uses whilst providing more detail for the day-to-day assessment of proposals. Option 2 also scored less favourably than the preferred option when assessed against SA objective 13.

DM18 Comprehensive development

Option 1 Include a policy to help facilitate a strategic approach to managing comprehensive development in the Borough																			Option 2 Consider each application on its own individual merits without reference to other sites adjacent to or affected by the proposal.																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
+	+	+	0	+	+	0	0	0	0	0	0	0	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

What the preferred option must do

Piecemeal development can be hard to plan for, in terms of infrastructure provision. The preferred option must therefore set out a detailed criteria-based approach for managing large-scale development in the borough. If sites come forward in a co-ordinated manner it can be possible to deliver larger proposals, a better mix of housing or tenures and additional funding through initiatives such as the Community Infrastructure Levy to invest in infrastructure provision, or mitigating the effects of development elsewhere in the Borough than would have occurred otherwise due to the size of the development proposal.



Preferred Option

The Council's preferred option is Option 1. A co-ordinated, comprehensive approach to managing development in the preferred option scores higher against sustainability objectives than the alternative option, which is to consider individual sites in isolation. Option 1 scores higher as a result of the additional benefits to the community that taking a strategic approach can bring in terms of infrastructure, mix of housing, access arrangements, and the efficient use of land.

SA comment

The preferred option could bring benefits in terms of providing a greater level of housing, while there are well-documented links between personal health and well-being and housing conditions. The preferred option will also help to improve accessibility to services while also seeking to make good use of previously developed sites. Housing could also enable a greater number of people to live closer to their work, reducing in-commuting to the Borough. The preferred approach can also contribute to better decision-making to ensure that development sites will offer a greater range of floorspace and uses, and score more highly against a wider number of SA objectives. This could also help to boost economic growth.

Why were the other option(s) rejected?

Option 2 was rejected as the preferred option scored higher against SA methodology. Despite the fact that Option 2 would not have a negative impact on sustainability objectives, and that development would still come forward, thus delivering against other key planning objectives such as infrastructure contributions and affordable housing, it was considered that Option 2 would miss the opportunity to gain advantages offered by multiple sites being considered in a co-ordinated manner. Therefore the impact on sustainability Objectives is merely neutral.

DM19 Pollution

Option 1 Include a policy that responds to pollution issues of specific relevance to Elmbridge																			Option 2 Rely on the NPPF for managing proposals affected by, or that may cause pollution rather than a Development Management policy.																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	+	0	0	0	0	+	+	+	+	+	0	0	0	+	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0

What the preferred option must do

Inclusion of a Development Management policy on pollution will help to improve the sustainability of development in the Borough. In order to be sustainable, all developments (including new buildings, demolition of existing buildings, conversions and changes of use) must show that there is no undue detriment to the general amenities enjoyed by existing surrounding occupiers, particularly where commercial and service activities are close to residential properties, and takes full account of all sources of pollution that affect the local environment. The preferred option must also seek necessary improvements, such as the remediation of contaminated land, and make provision for mitigation measures where necessary. It is also crucial that the planning and pollution control regimes complement each other.

One of the Council's key planning objectives is to focus development in the most sustainable locations, which involves using land efficiently and protecting the Green Belt. However, development in urban locations may have an impact upon, or be affected by existing sources of pollution, such as noise, odour, contaminated land and poor air quality. Development can also risk contributing new sources of pollution and other disturbance during both construction and operation.

Preferred option

The Council's preferred option is Option 1. This provides the local detail which will be necessary, and will crucially ensure the remediation of land where it is necessary.

SA Comment

The preferred option will bring more potential development sites into use by ensuring the remediation of contaminated land. The avoidance of contaminated land or the use of remediated land for new development will, in turn avoid any significant harm to human health, and enable previously developed land to be brought back into use. This can help reduce poverty and social exclusion by virtue of offering more people a chance to live in a good quality home, and, in conjunction with policies directing the bulk of development to urban settlements, will ensure that development can be accessed by a range of transport modes, potentially improving accessibility to jobs and services.

Why were the other option(s) rejected?

Option 2 was rejected because it is considered that taking a local policy approach will respond more effectively to areas of concern identified by the Scoping Report which have specific relevance to Elmbridge. The NPPF cannot take the more locally-specific approach which will be required by a Development Management policy and did not perform as well under detailed assessment.

DM20 Landscape and trees

Option 1 Include a policy that provides detail for managing proposals that affect trees and landscape																			Option 2 Rely on national policy and local guidance such as the Design and Character SPD and A Guide to Incorporating Trees in Proposals for Developing Land.																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	+	0	+	0	0	0	+	0	0	0	+	++	0	+	0	0	0	0	0	+	0	+	0	0	0	+	0	0	0	+	0	0	0	0	0	0	

What the preferred option must do

The preferred option seeks to ensure that developers consider the local landscape at the outset of the development design process and ensure this is reflected in their landscape proposals. Depending on the scale, nature and location of the development a thorough survey, appraisal and analysis of the site and its surroundings will usually be essential.

Preferred option

The Council’s preferred option is Option 1. This will ensure the detail is provided, which also takes full account of information on trees.

SA Comment

Both options scored positively under this assessment and will help the district to adapt to the impact of a changing climate, will protect the landscape and wildlife habitat, while green spaces can be useful for flood storage. However the preferred option performed more effectively against Objective 13, which is pivotal when devising a policy with the aim of conserving and enhancing the natural landscape in Elmbridge.

Why were the other option(s) rejected?



Option 2 was rejected as national policy provides the overarching strategy for landscape and the natural environment, but when applicants submit development proposals to the Council it will not provide the detailed locally specific criteria required to ensure a positive impact on the local landscape.

Although 'the Guide to Incorporating Trees on Development Sites' provides important detail regarding a specific topic, it is considered that a Development Management policy would provide the weight needed to make decisions on applications that include a wide range of landscape issues on a day-to-day basis. Although both options scored similarly, the preferred option focuses on local character, design and amenity and hence has a greater positive impact against Objective 13.

DM21 Access and Parking

Option 1 Include a detailed policy and use Surrey County Council Vehicular and Cycle Guidance instead of local parking standards.																			Option 2 Rely on national policy																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	+	0	+	0	0	+	+	0	0	0	0	+	+	0	0	0	0

Option 3 Include a detailed policy that covers issues relevant to the Borough, together with local parking standards based on maximums																			Option 4 Include a detailed policy and apply minimum/demand parking standards to all new development proposals																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	0	+	0	+	0	0	0	+	+	0	+	+	+	0	0	0	0	0	-	-	0	0	+	-	0	-	-	0	0	+	+	-	-	0	0	0	0

What the preferred option must do

One of the objectives of the Core Strategy is to reduce people's reliance on driving, by directing new development to sustainable locations, promoting attractive and convenient alternatives and in doing so reducing congestion and pollution caused by traffic. The Council's Preferred Option must support the aims of the Core Strategy by providing detailed parking standards that are also based on maximums and ensuring that proposals affecting public car parks are carefully considered in terms of the wider impact on the Borough. Accessibility is an important factor to a development proposal and the policy must ensure that various environmental and highway safety issues have been addressed.

Preferred option

The Council's preferred option is Option 3. It is considered that this will enable the necessary detailed criteria to be provided to address access and parking issues associated with the control of new development.

SA Comment

Option 3 delivers the greatest benefits. It will enable access to services and facilities within the main centres and takes account of Elmbridge's circumstances as a borough with high car ownership, in part due to the settlement patterns of this area.

Why were the other option(s) rejected?

Option 1 was rejected as although high levels of car ownership are common throughout Surrey, Elmbridge has particular local circumstances that require local solutions. One key problem is that in many of the main settlements, the train stations are located away from the town and village centres which often results in people needing to use the car to access these important public transport modes. Although higher than the Surrey Guidance, these local parking standards better reflect the parking need for residential units across the Borough.

Option 2 was rejected as Elmbridge has specific local transport issues including high car ownership and so requires a specific policy relating to the local context and relevant to the issue of access and parking. The NPPF only contains the strategic policy relating to the promotion of sustainable transport and does not include the detail with regard to access and parking provisions on individual planning proposals.

Option 4 was rejected as the option is not consistent with the Core Strategy, which applies maximum parking standards to all uses, or the Framework, both of which aim to reduce greenhouse gas emissions and congestion by reducing reliance on the private car and promoting sustainable transport modes. There would also be the consequence that requiring greater levels of parking provision would impact on the amount of available land for housing and other uses in a Borough where the supply of land is already limited and may, therefore, result in pressure to develop the Green Belt.

DM22 Refuse, Recycling and External plant

Option 1 Include a policy with detail on this specific type of development																			Option 2 Rely on national policy and other local policy and guidance.																		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

What the preferred option must do

To encourage recycling and reduce waste as set out by the Core Strategy, it is important that new development incorporates adequate waste facilities and storage points, recognising that the users of any new development will produce waste. The policy seeks to ensure bin storage and plant is sited and designed carefully in order to prevent any negative effects on amenity and the street scene. It is also vital that refuse and recycling facilities are easily accessible for regular users and collection vehicles. The policy approach must also promote general sustainability of waste management, in line with the national approach for waste and recycling.

Preferred Option

The Council's preferred option is Option 1. Although there is additional local guidance available on bin storage (Design and Character SPD and Environmental Care guidance) a Development Management policy would deal with the wider issues of siting, location and design, filling the gap between general design policy and specific guidance.

SA Comment

The preferred option scores highly on health and well-being and in helping the district adapt to climate change. The reuse of goods helps to save the emissions of CO2 and other pollutants emitted during production and manufacturing processes. Making sure that development incorporates suitable facilities for recycling is therefore important.

Why were the other option(s) rejected?

Option 2 was rejected as national policy (in the guise of the NPPF, Planning Policy Statement 10 and the consultation Draft National Waste Management Plan, July 2013) does not contain any specific policy or guidance on bin storage and waste facilities. Local people have stated in

past consultations that the location of bins was problematic and had a negative impact on the street scene and character of the area. This is a localised issue, and national guidance does not contain sufficient detail to address the matter.

Flooding

The Council's Core Strategy contains policy CS26 on Flooding. This policy is a detailed policy which included the need for sequential and exception tests (where these are relevant), set out the Council's approach to requirement of Sustainable Urban Drainage Systems, flooding and permitted development rights. The Council's policy approach to the issue of flooding was as follows:

Option 1 Introduce a development management policy on flooding, setting criteria to strengthen the strategic approach of CS26	Option 2 Rely on CS26, national policy and other guidance
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After studying these possible approaches in detail, it was considered that policy CS26 will ensure that any new development would not have an unacceptable impact on flood risk within the District, and that there was no further localised information which could be added to strengthen the approach set out by the Core Strategy.

Therefore the preferred policy option is set out under Option 2, which does not necessitate the creation of an additional local policy for the Development Management Policy document. Furthermore, the 2010 Flood and Water Management Act places a duty on the Council to take a lead role in managing local flood risk. The Council will continue to work in partnership with the Environment Agency, landowners, developers and other stakeholders to comply with the Act.

Table 3: SA of Preferred Policy Options taken forward for Regulation 18 stage

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
DM1	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
DM2	-	0	0	0	+	+	+	0	0	0	0	+	+	+	0	-	-	0	0
DM3	-	0	0	0	+	+	+	0	0	0	0	+	+	+	0	-	-	0	0
DM4	0	+	0	0	+	0	0	0	0	0	0	+	+	0	0	+	+	0	0
DM5	-	+	0	+	+	+	0	0	0	0	0	+	+	0	0	-	-	0	0
DM6	0	+	0	+	0	+	0	0	0	0	0	+	+	0	0	0	0	0	0
DM7	0	+	0	0	+	0	0	0	+	0	+	+	+	+	+	0	0	0	0
DM8	0	+	+	0	+	+	0	0	0	0	0	0	++	+	0	+	+	0	0
DM9	+	+	0	0	+	+	0	0	0	0	0	0	+	+	0	+	+	0	0
DM10	0	0	0	0	+	+	0	+	+	0	0	0	0	+	0	+	+	0	0
DM11	0	0	0	0	0	+	0	+	+	0	0	0	++	0	+	0	0	+	0
DM12	0	+	0	+	+	0	0	0	0	0	+	+	+	+	+	0	0	0	0
DM13	0	0	+	0	+	+	0	0	+	0	0	0	0	+	0	+	+	0	0
DM14	0	0	0	0	+	0	0	0	0	+	0	+	+	0	0	0	+	0	0
DM15	0	0	0	0	+	0	0	0	0	0	0	0	+	+	0	+	+	0	0
DM16	0	+	+	+	+	+	0	+	+	+	+	+	++	+	+	0	0	+	+
DM17	+	+	+	0	+	+	0	+	+	0	0	0	0	+	0	+	+	0	0
DM18	+	+	+	0	+	+	0	0	0	0	0	0	0	+	0	+	+	0	0
DM19	0	+	0	0	0	0	+	+	+	+	+	0	0	0	+	0	0	0	0
DM20	0	+	0	+	0	0	0	+	0	0	0	+	++	0	+	0	0	0	0
DM21	0	0	+	0	+	0	0	0	+	+	0	+	+	+	0	0	0	0	0
DM22	0	+	0	0	0	0	0	0	0	0	0	0	++	0	+	0	0	0	0

5. Plan Policies

5.1 After public consultation on the draft Development Management Plan ended the responses received were assessed and the policies amended where appropriate. A final draft of the Development Management Plan was then prepared for submission.

5.2 This final draft did not contain any new policies and the layout of the Plan was relatively unchanged. As at the earlier stage, the 22 policies were split into four sections, namely “Overarching approach”; “Universal Policies”; “Making Places”; and “Open Spaces”. However, whereas the Universal Policies was previously the final section of the draft document it was brought forward to form the second section in the proposed submission document. This necessitated renumbering of most of the policies.

5.3 Whilst no new policies were included, or any deleted, a number of policies were amended following the consultation. Some of these were minor amendments of a factual nature or typographical errors and as such would not warrant further appraisal against the sustainability objectives. However, some were more significant and required further appraisal. The table below outlines the significant changes made to the Plan and the results of the appraisal.

Preferred Approach Policy No.	Proposed Submission Policy No.	Changes	Impact on SA
DM2 Green Belt (Development of new buildings)	DM17	In criterion c “... through the rationalisation of existing buildings into a smaller envelope of development within the site.” was removed to provide more flexibility in decision making.	The amendment to the policy does not reduce the Council’s ability to ensure development does not impact negatively on the Green Belt. However, the change does enable the Council to ensure it can make the most effective use of previously developed sites in the Green Belt. The change does not affect the SA scoring for this policy.
DM3 Green belt (Development of existing Buildings)	DM18	In criterion a) ii), the threshold of 30% was lowered to 25%	While the policy protects the openness of the Green Belt, the scope to extend existing properties in the Green Belt will be limited by the policy to prevent inappropriate development. Protecting green belt will also protect biodiversity and wildlife habitats, as well as listed buildings and conservation areas which are within or adjacent to the

			Green Belt. It also recognises that there are circumstances that existing development in the Green Belt has the potential to expand without impacting on the openness of the Green belt. The change does not affect the SA scoring for this policy.
DM4 Horse related development	DM19	There was a minor wording change to paragraph e) to add reference to 'facilities for walkers on existing footpaths or other paths currently only used by walkers'.	The changes in wording ensures that all users of paths in the Borough's open spaces are taken into account. This change does not affect the SA scoring.
DM6 Nature conservation and bio-diversity	DM21	There was a change to Paragraph d) which requires sufficient mitigation and compensation where any possible development with adverse effects may be approved.	When significantly adverse impacts occur as a result of development works, the policy seeks mitigation measures to compensate for the negative impacts. Directing the bulk of development to the urban settlements can help to conserve existing wildlife habitats and protect the wider landscape. Protecting wildlife habit can also, in turn, help to conserve and enhance the borough's landscape. Additionally, maintaining the openness and undeveloped nature of the countryside could also help in mitigating flood risk in Elmbridge. This policy would be applied on a site-specific basis, and so it is not considered that the amendment affects the SA scoring.
DM7 Recreational use of waterways	DM22	There was a minor wording change to paragraph d) which allowed new bases to be constructed as well as extensions to existing facilities, as long as there is not	The change encourages new development which can contribute to recreational use of the rivers. Whilst this could impact on other uses the policy maintains the requirement that such new uses must not impact

		conflict with other users, local amenities or wildlife in general.	negatively on existing uses and local amenity. This change does not affect the SA scoring.
DM8 Social and community facilities	DM9	Policy will apply to further education facilities.	The policy continues to acknowledge the importance of protecting the existing facilities and providing new facilities to help improve residents' quality of life. The policy helps retain community, social and educational facilities, building on Core Strategy policy CS16 and will therefore contribute to social cohesion and improved education. The SA score is unchanged.
DM12 Riverside development and uses	DM13	<p>Minor wording changes in parts a) and c) of the policy.</p> <p>In part a) 'in some locations, it may be appropriate.....' is replaced with 'In all riverside locations, it will be appropriate for a strip of land to be retained free of development to maintain the open character of the riverside as well as providing important maintenance space and public access and in the interests of biodiversity and alleviating flood risk'</p> <p>In part c) the words 'where appropriate, enhance...' are replaced with 'actively enhance biodiversity features...'</p>	These changes ensure riverside locations are managed appropriately and remain accessible with space for habitats and flooding. Therefore it is considered that these changes will not impact on the SA scoring for this policy.
DM13 Evening Economy	DM14	Minor text amendment in criterion a) from 'taking into account the impact' to 'unless	This is a minor change and therefore will not impact on SA scoring for this policy.

		they result in a harmful impact'	
DM14 Advertisements, Shopfronts and Signage	DM15	There was a minor wording change to the policy which saw paragraph c) refer to 'large illuminated fasciae will be resisted outside town and district centres 'or other appropriate locations'.	This wording change improves the policy's performance against Objectives 10 and Objective.
DM16 Design and Amenity	DM2	A minor change to the drafting appeared under criterion b), where the policy required regard to be had to the appearance, scale, mass, height, levels and topography, prevailing pattern of built development, separation distances to plot boundaries, and character of the host building in the case of extensions.	The changes provide clarity and should enable improved decision making with regard to ensuring development reflects local character. As such these changes did not affect the scoring for this policy.
DM18 Comprehensive Development	DM4	There was a minor wording change made to paragraph a) of the policy to require additional benefits to the Borough such as, for example, improved access arrangements, or "a wider mix of housing, integration of key external natural and biodiversity links through the development site or provision of on-site playspace".	The addition of a reference to biodiversity now brings a positive score against Objective 12. The policy can also contribute to better decision-making to ensure that development sites will offer a greater range of floorspace and uses, and score more highly against a wider number of Objectives. This could also help to boost economic growth.
DM20 Landscape and Trees	DM6	There is a minor wording change to criteria d), which adds 'unless in exceptional circumstances the benefits will outweigh the loss'.	This change is not considered significant enough to affect the scoring against Objectives 12 or 15, although dependent on the development proposal it could result in greater

			mitigation being proposed as a result of development. Overall it is not considered to affect the scoring for this policy.
DM21 Access and Parking	DM7	There was change made in paragraph b) of the policy to set a minimum provision of one parking space per residential unit. This is to take account of a wide range of local circumstances, including poor public transport accessibility in the Borough.	Car use is already high in the district. The policy itself will enable better access to services and facilities within the main centres and takes account of Elmbridge's circumstances as a borough with high car ownership, in part due to the settlement patterns of this area. Setting a formal threshold is therefore not likely to impact upon the SA scoring.

Table 4: Revised Sustainability Appraisal Matrix following changes made to preferred approach policies

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
DM1	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
DM2	0	+	+	+	+	+	0	+	+	+	+	+	++	+	+	0	0	+	+
DM3	+	+	+	0	+	+	0	+	+	0	0	0	0	+	0	+	+	0	0
DM4	+	+	+	0	+	+	0	0	0	0	0	+	0	+	0	+	+	0	0
DM5	0	+	0	0	0	0	+	+	+	+	+	0	0	0	+	0	0	0	0
DM6	0	+	0	+	0	0	0	+	0	0	0	+	++	0	+	0	0	0	0
DM7	0	0	+	0	+	0	0	0	+	+	0	+	+	+	0	0	0	0	0
DM8	0	+	0	0	0	0	0	0	0	0	0	0	++	0	+	0	0	0	0
DM9	0	+	+	0	+	+	0	0	0	0	0	0	++	+	0	+	+	0	0
DM10	+	+	0	0	+	+	0	0	0	0	0	0	+	+	0	+	+	0	0
DM11	0	0	0	0	0	+	0	+	+	0	0	0	++	0	+	0	0	+	0
DM12	0	0	0	0	0	+	0	+	+	0	0	0	++	0	+	0	0	+	0
DM13	0	+	0	+	+	0	0	0	0	0	+	+	+	+	+	0	0	0	0
DM14	0	0	+	0	+	+	0	0	+	0	0	0	0	+	0	+	+	0	0
DM15	0	0	0	0	+	0	0	0	0	++	0	+	++	0	0	0	+	0	0
DM16	0	0	0	0	+	0	0	0	0	0	0	0	+	+	0	+	+	0	0
DM17	-	0	0	0	+	+	+	0	0	0	0	+	+	+	0	-	-	0	0
DM18	-	0	0	0	+	+	+	0	0	0	0	+	+	+	0	-	-	0	0
DM19	0	+	0	0	+	0	0	0	0	0	0	+	+	0	0	+	+	0	0
DM20	-	+	0	+	+	+	0	0	0	0	0	+	+	0	0	-	-	0	0
DM21	0	+	0	+	0	+	0	0	0	0	0	+	+	0	0	0	0	0	0
DM22	0	+	0	0	+	0	0	0	+	0	+	+	+	+	+	0	0	0	0

Other effects of the DM Plan

5.4 As outlined in the SA report for the Core Strategy the principal cumulative, synergistic and secondary effects from the overarching spatial approach will come from the increase in housing and the proposed location of housing. As the DM Plan seeks to support the Core Strategy the policies it contains will not have any additional impact. Potentially policies in the DM Plan will ensure that when development comes forward it is more sustainable and further mitigates the cumulative, synergistic and secondary effects from increasing development in the Borough.

6. Conclusions

6.1 The outcome of this sustainability appraisal is that no wholly unsustainable policies have been put forward in the submission Development Management Plan. This was expected given that Elmbridge Borough Council's Core Strategy, which sets the spatial strategy for the Borough and to which the Development Management Plan must conform, was appraised and found to be generally sustainable. In addition, using the Sustainability Appraisal throughout what has been an iterative process of developing the policies in the Plan has enabled these to take account of key sustainability objectives.

Mitigating Adverse Effects of Local Plan Policy and Maximising Beneficial Effects

6.2 Sustainability Appraisal guidance requires measures to prevent, reduce or offset significant adverse effects of implementing the Local Plan. This SA report identifies the likely negative and positive impacts each policy has on achieving sustainability objectives based on the framework set out. It demonstrates that the proposed submission version of the plan will contribute significantly towards delivering the social, economic and environmental objectives set out in the SA framework. Where any potential negative effects were identified, it was concluded that the draft policies in the Development Management Plan or Core Strategy adequately alleviated or mitigated the impacts.

Monitoring

6.3 Monitoring is a key element of the planning system and a requirement under Section 35 of the Planning and Compulsory Purchase Act 2004. Section 113 of the Localism Act 2011 requires that local planning authorities produce an Authority Monitoring Report (AMR). The purpose of the AMR is to provide information on the social, environmental and economic effects of planning policy documents help determine the extent to which objectives, targets and programmes are being met and monitor the extent to which the timetable set out in the Local Development Scheme is being met.

6.4 As part of its objective led performance framework, the AMR will continue to monitor those indicators outlined in the Core Strategy and other documents in the Local Plan. The indicators have been examined alongside agreed objectives in order to assess their effectiveness regarding whether the policies set out are achieving the agreed objectives. Monitoring will also allow the Council to know if it is necessary to trigger contingency plans outlined in the Core Strategy should performance fall below expectations.

6.5 The indicator list will also be reviewed regularly so that it is kept up-to-date in the context of changes to the national policy position.