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Royal Borough  
Of Windsor &  
Maidenhead

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Sustainability Appraisal of the  
Planning Obligations &  
Developer Contributions  
Supplementary Planning Document

## **Draft Final Sustainability Report**

**June 2005**  
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**Royal Borough of Windsor & Maidenhead**

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## **1 SUMMARY & OUTCOMES**

### **1.1 Non-technical summary**

This report documents the results of the Sustainability Appraisal (SA) of the Borough's proposed Supplementary Planning Document (SPD) on Planning Obligations and Developer Contributions. The SPD is based extensively on an earlier Supplementary Planning Guidance (SPG) document, and it is part of the Borough's Local Development Framework (LDF), which also includes the Core Strategy DPD.

SA of the principal spatial plans produced by Local Planning Authorities is a requirement of the 2004 Planning and Compulsory Purchase Act, and is necessary as the earlier SPG did not undergo this process. Such plans are also required to undergo Strategic Environmental Assessment (SEA). However the Council considers that the SPD will not have significant environmental impacts and that SEA is not necessary. Opinions sought from the statutory environmental consultation bodies in England have confirmed this is acceptable.

The initial phase of gathering evidence was undertaken by the Council when preparing its Scoping Report. It identifies the requirements of regional and national legislation, and a moderate number of sustainability trends and problems in the Borough which are largely but not exclusively social. The Scoping Report also defines a set of 23 aspirational objectives which the DPD and SPD should aim to deliver. These objectives comprise the SA Framework used to assess the sustainability of the proposed policies in the DPD. However the broad and generic nature of the SPD policies mean that the SA Framework can also be used for this assessment.

This SA is restricted to the assessment of policy / plan impacts corresponding to Stage C of guidance issued in September 2004. As the SPD is intended to expand an overarching policy on obligations and contributions in the Core Strategy, it is considered unnecessary to assess different options (Stage B of the assessment process) as it is assumed these are being considered in preparing the Core Strategy. This approach has been approved by the Government Office for the South East of England (GO-SE), and it could be argued that the policies in the SPD provide a range of options for the type of contribution that the Council might seek.

The SA was undertaken by Scott Wilson in June 2005 and covers the 14 planning policy areas where contributions are proposed. The SPD includes details of more than 400 individual schemes which might be wholly or partly funded from obligations and contributions, ranging from a new footbridge over the Thames to improvements to street furniture in the centre of Maidenhead. Decisions on which schemes will be taken forward will be made by Council Members in due course. The individual schemes have not been subject to SA (again this has been approved by GO-SE), but they have been used to assess the possible impacts of most policies. Separately, the Council has produced a draft Developers' Guide which provides more detail on its approach, the supporting planning legislation, and its method of calculating some contributions. This Guide also informed the assessment.

SA requires consideration of a "business as usual" scenario, which normally represents what would happen if the plan, in the case the SPD, was not

implemented. In order to provide this comparison the assessment also reviewed policy IMP1 from the adopted Borough Plan (overarching policy on obligations and contributions), and an SPG published in 1999 (defines policy approach on affordable housing which has not been superseded at this time).

The assessment concluded that the very general nature of IMP1 meant that the SPD provided a more transparent policy which gives developers a clearer indication of the contributions which the Council may seek to negotiate. However it is essential that a corresponding policy replacing IMP1 is incorporated into the Core Strategy to signal the Council's intention to seek contributions in the areas listed in the SPD.

The assessment concluded there was little difference between the earlier SPG (based on Borough Plan policy H3) and the current policy on affordable housing, which remains a priority issue for the Borough. However the proposed SPD indicates a specific minimum level of provision which would apply, and this provides a clearer statement of intent than the earlier SPG.

Otherwise the assessment of the SPD was strongly positive, and this result is to be expected from a document designed to secure funding for infrastructure and community projects. Most of the objectives in the SA Framework are addressed directly by at least one of the SPD policies, and many policies have secondary beneficial effects.

It was not possible to identify any clearly significant impacts of the SPD as the policies have no spatial expression. The accompanying lists of schemes that they might fund indicate the nature of improvements but the severity (or more likely the benefit) of the impacts cannot be judged without knowing where and what type of development will occur; what type of contribution(s) the Council intends to seek, and how willing the developer will be to meet these terms.

The assessment identifies a number of potentially significant impacts which, in all cases, reflect the support given by a policy to a particular SA objective – in other words, the assessments are all positive.

This situation has implications for future monitoring of the SPD once it is accepted. A few of the schemes listed in it are large enough that they will (or may) have to undergo Environmental Impact Assessment (EIA) to ensure any adverse impacts are mitigated. However the majority of the listed schemes are very localised. While this means impacts are also likely to be localised it does not obviate the need for mitigation if it is necessary. The assessment therefore recommends that the SPD should make clear that generic development control policies (eg. those protecting conservation areas and key biodiversity assets such as the Thames Valley Lowland Heaths, as well as protecting air quality, etc.) should apply to projects funded this way.

The assessment also recommends that monitoring of the effects of the SPD will be largely performed by monitoring of the Core Strategy since the two are closely linked. However it will be advisable for the Council to monitor the volume and spread of contributions received to ensure there is a balanced distribution across economic, environmental and social improvements which reflects the local problems identified in the Scoping Report. Moreover, since contributions are linked to development, which will occur primarily in the built up areas, it will be important to ensure that an adequate share of improvements are delivered in rural areas of the Borough.



## **1.2 What difference has the process made?**

The SA provides the Council with an independent assessment of the likely sustainability impacts of the SPD, insofar as it is possible to determine these from the very general nature of the stated policies.

We understand the Council intends to publish a Developers' Guide in parallel with the SPD, which will amplify aspects of seeking and calculating contributions, and which will justify its approach based on local conditions and its status as a local planning authority. The assessment has identified a number of instances where some of the detail in the Guide might be transposed to the SPD in order to clarify specific issues. The broad, general nature of the policies, and their potential positive impact in securing infrastructure and other community improvements mean that the scope to identify and reduce environmental impacts are limited at this time.

## **1.3 How to comment on the report**

This report will be presented for consultation in support of the SPD which it assesses, and the Council will advise consultees separately on the process and timetable for submitting responses.



## 2 BACKGROUND / CONTEXT

### 2.1 Purpose of the SA and the SA Report

Sustainability Appraisal is a requirement under Regulation 19(5) of the *Planning and Compulsory Purchase Act (2004)* for the documents that comprise a Local Development Framework (LDF). The Regulation requires local authorities to “(a) carry out an appraisal of the sustainability of the proposals in each document [in the LDF]; [and] (b) prepare a report of the findings of the appraisal” (Section 18(5)), this process being referred to as a Sustainability Appraisal (SA).

The purpose of SA is “to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plan. ... [It is] an iterative process that identifies and reports on the likely significant effects of the plan and the extent to which the implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.” (ODPM, 2004)<sup>1</sup>

The SA Report is a key output of the process and should reflect and support the draft plan on which formal public consultation is to be carried out. It has been prepared in support of the Planning Obligations and Developer Contributions Supplementary Planning Document (SPD) for this purpose, to demonstrate that sustainability considerations have been incorporated into the document, and to provide a formal statement and audit trail of the assessment.

### 2.2 The Plan, its objectives and outline of contents

The initial Local Development Framework for the Borough comprises the Core Strategy DPD (which will undergo a separate assessment), and the Developer Contributions SPD, which is the subject of this assessment.

In 2003 the Council prepared Supplementary Planning Guidance on developer contributions, which expanded on Implementation policy IMP1 in the adopted Borough Plan, defining:

- the circumstances where funding would be sought
- the nature of contributions both in general (infrastructure, financial, etc.) and as a list of specific projects for which funding might be sought
- criteria defining which developments might be subject to contributions.

The SPG was prepared so that it was compliant with planning policy and guidance in PPG12 but did not undergo Sustainability Appraisal at that time. The current SPD modifies the SPG to reflect changes in policy and in Borough planning priorities in the intervening period. It supersedes policy IMP1, although policy on Affordable Housing is derived in part (though not strictly saved) from an SPG issued in March 1999.

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<sup>1</sup> Office of the Deputy Prime Minister, Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, September 2004.

The SPD has been prepared in parallel with the Council's Core Strategy Development Plan Document (DPD), for which a set of 17 spatial objectives have been defined, which are listed below in Table 1. As it supports the broad spatial objectives of the DPD it is assumed that these objectives apply to the SPD also, objective 17 being directly relevant to its purpose.

**Table 1: Core Strategy (LDF) spatial objectives**

|    |   |
|----|---|
| 1  | To locate development in existing settlements maximising the use of previously developed land and prevent the loss of the Green Belt, countryside and most versatile agricultural land.   |
| 2  | To locate housing primarily in settlements outside of the Green Belt at a scale relating to the accessibility to jobs, shops and services by modes other than the car and relative to the capacity of existing infrastructure including public transport.           |
| 3  | To reduce the need to travel by ensuring new development takes place in locations with good accessibility to local services by walking, cycling and public transport, and ensuring that adequate provision is made for all types of travel modes.                   |
| 4  | To meet the housing needs of the Borough as identified within the Regional Spatial Strategy, ensuring that the provision of housing types, sizes and tenures, including affordable housing and housing for the elderly, meet the identified needs of the community. |
| 5  | To maintain a buoyant and broad-based economy whilst carefully controlling the growth in employment generating development in order to reduce pressures in land, housing, labour market and the environment.  |
| 6  | Maintaining the purpose and extent of the Green Belt, protecting it from inappropriate forms of development.  |
| 7  | To promote town centres of Maidenhead and Windsor as the principal locations for retail and leisure development, while protecting and promoting village and local centres which are consistent with their scale and function.                                       |
| 8  | To minimise development which would put people or property at risk from flooding.   |
| 9  | To minimise development which would put people and property at risk from pollution and nuisance.  |
| 10 | To promote energy conservation including the appropriate use of renewable energy.   |
| 11 | To protect and enhance the natural environment, promoting biodiversity and protecting sites of conservation importance.   |
| 12 | To ensure new development is of high quality that protects and enhances the character of the Borough and local distinctiveness.   |
| 13 | To protect and enhance the historic environment and heritage of the Borough, ensuring the integrity of buildings and place is respected.  |
| 14 | To provide the best educational opportunities for all individuals and to develop their aptitudes and abilities.   |
| 15 | To meet the recreation and community needs of the Borough including the informal enjoyment of the countryside.  |
| 16 | To minimise development which would put people or property at risk and encourage forms of development which would enhance community safety.   |
| 17 | To ensure the provision of appropriate infrastructure and amenities to meet the needs of new development, including the dual use of facilities.   |

Policy IMP1 provides a general, overarching statement of intention to seek contributions for infrastructure improvements that are necessitated by growth in people, jobs, recreational activities, traffic, etc. as a result of new development. In contrast, the SPD provides more specific statements of policy reflecting the scope of the three bullet points above. Policy on contributions is stipulated for:

- affordable housing
- transport infrastructure
- educational facilities
- community facilities
- library services
- recreation and leisure
- town management / improvement
- economic development
- landscaping and biodiversity
- air quality
- waste disposal
- archaeology
- flood risk management / drainage
- parish improvement projects

In addition the SPD contains more than 400 examples of specific projects where the Council is seeking contributions in the areas listed above. The Council has consulted the Government Office for the Southeast of England (GO-SE) on the scale of SA needed of this SPD, and it has been confirmed that the appraisal can be confined to the 13 areas of policy listed above. Decisions on which infrastructure projects will benefit from contributions will be determined by the Council at a later date.

### 2.3 Relationship to other documents

The Council has prepared a Scoping Report<sup>2</sup>, as defined by current ODPM guidance, which contains:

- a review of the principal legislation at international, national, regional, county and local level which may affect the wider LDF in terms of objectives, policy, targets, etc.
- a 'baseline' defining the economic, social and environmental conditions in the Borough at present, or in the recent past, and with other data showing time trends or the comparative regional or national situation, which provides an indication of potential sustainability issues
- a set of sustainability issues for the Borough identified from the first two activities, and informed by officers' local knowledge
- a Sustainability Appraisal Framework (SA Framework) which comprises a set of 23 overarching, aspirational objectives which the broader LDF seeks to achieve through its component plans and the policies they contain.

The Scoping Report is a core component of the SA of all parts of the LDF, which also currently includes the Core Strategy DPD. It will be updated in due course as new information comes to light and to reflect changing policies and targets.

<sup>2</sup> Royal Borough of Windsor & Maidenhead, Core Strategy & Policies DPD Sustainability Appraisal Scoping Report, April 2005.

The Core Strategy and the SPD contain generic policy and the Council considers that the Scoping Report which has been prepared for the SA of the DPD is also suitable for appraisal of the SPD. This position is consistent with recently issued interim guidance on the SA / SEA process<sup>3</sup>, and this has been confirmed by GO-SE.

Therefore this document should be read in conjunction with the Scoping Report, particularly in terms of the sustainability issues and SA Framework which it defines.

## 2.4 Compliance with the SEA Directive & Regulations

In summer 2001, the European Union legislated for Strategic Environmental Assessment with the adoption of Directive 2001/42/EC on the *Assessment of the Effects of Certain Plans and Programmes on the Environment* (the 'SEA Directive'). Article 13 of the Directive states that SEA must be undertaken for a range of UK plans and programmes whose preparation began after 21<sup>st</sup> July 2004, or whose formal adoption is not complete by 21<sup>st</sup> July 2006. The Directive was transposed into UK law on 20<sup>th</sup> July 2004 in the UK SEA Regulations<sup>4</sup>. Regulations 5 and 6 of these Regulations define the range of plans to which SEA may apply, which include the principal spatial plans prepared by Local Planning Authorities.

The Council considers that the content of the SPD – a set of overarching principles for seeking developer contributions – would have no significant environmental impacts other than those that would be normally expect to be mitigated by planning obligations and / or Environmental Impact Assessment. In April 2005, it approached the four nominated statutory consultees in England<sup>5</sup> seeking a 'screening opinion' under Regulation 9(2) of the Regulations that SEA of the SPD would not be necessary.

At the time of preparation of this draft report the period for consultees to respond had expired, and the Council had received two responses confirming that SEA would not be necessary, provided that the environmental protection provisions of the Directive and Regulations would be enforced through other LDF policies as necessary.

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<sup>3</sup> Office of the Deputy Prime Minister, Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Interim advice note on frequently asked questions, April 2005, specifically FAQ3.

<sup>4</sup> HM Government, The Environmental Assessment of Plans and Programmes Regulations 2004, Statutory Instrument 1633, July 2004.

<sup>5</sup> The Countryside Agency, the Environment Agency, English Heritage and English Nature.

### 3 APPRAISAL METHODOLOGY

#### 3.1 Introduction

The SA process comprises a two-stage appraisal. First, the options are assessed to help the Council in determining the appropriate approach to be adopted in each area of policy. Once the preferred approach in each area has been defined the likely impact of the policies is assessed.

Current SA guidance does not require the Council to undertake the first stage assessment of options “*if the local authority has undertaken work at sufficient detail during the SA of the DPD*”<sup>6</sup>. Moreover guidance also proposes that policy options should only be proposed where they are appropriate.

The Council considers that assessment of its Core Strategy will provide adequate detail of each area of policy. Being broad and overarching statements, policies in the SPD can be implemented so that they support the Core Strategy objectives.

Policy on planning obligations offers few reasonable options that can be considered. These include persisting with the existing policy (ie. the ‘do nothing’ scenario), extending the range of situations in which contributions will be sought, and adjusting the type or value of contribution.

The SPD as a whole presents a set of options insofar as the Council will have the discretion to adjust the level and type of contributions sought for different types of development. However this suggests a potentially large range of options which it is impractical to evaluate individually. In practice the Council will determine which contributions may be sought from a development on a case-by-case basis.

#### 3.2 Approach adopted to the SA

The assessments of options and plan impacts were based on a common approach that assessed the potential impact or contribution of each policy or option to achieving the 23 objectives in the SA Framework (see section 4.5).

##### 3.2.1 Reference material

Assessment is based on the Third Edition of the draft SPD, which was published in February 2005. It has been supported by unpublished material documenting changes to the 2003 SPG which are reflected in this latest draft of the SPD, and by an initial draft of the Developers’ guide which provides background on the planning policy context and the Council’s approach.

Assessment focuses on the text of the 13 policy areas in the SPD, which are laid out as a table defining the types of development where contributions may be sought, the criteria or conditions when they may be sought, and the nature of the contribution. Some policies are supported by extensive lists of the infrastructure and other projects which might be funded by future contributions. In some cases this detail has been used to assess the likely impact of the policy.

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<sup>6</sup> Reference as for footnote 1, para. 2.3.24.

Recently issued interim guidance makes it clear that SA should be undertaken for policies in adopted plans on which the SPD may be based<sup>7</sup>, where those plans have not previously undergone SA. In this case the assessment has also been applied to:

- Policy IMP1 in the adopted Borough Plan, which is the preceding policy on developer contributions
- The 1999 SPG on Affordable Housing (itself reflecting policy H3 in the Borough Plan) from which policy 1 in the SPD is partially derived.

SA / SEA guidance refers to the need to evaluate the ‘business as usual’ scenario which indicates how sustainability conditions in the Borough would evolve without the SPD. In this case Policy IMP1, as an adopted policy, provides this scenario.

It is not clear from current guidance whether assessment of the 1999 SPG is strictly necessary, however it has been undertaken in order to provide the Council with a more robust assessment which provides a comparison with existing policy on affordable housing.

### 3.2.2 Initial assessment of plan impacts

The nature, impact and potential significance of the impacts were assessed using a standard scoping approach, which is summarised in Table 2. Table 3 provides an example of the template used for this work. The assessment of the SPD also includes comments against those objectives where the policy is considered to have an impact.

**Table 2: Assessment scoring approach**

| Symbol | Likely effect against the SA Objective   |
|--------|--|
| √√√    | Strong and significant beneficial impact   |
| √√     | Potentially significant beneficial impact  |
| √      | Policy supports this objective although it may have only a minor beneficial impact   |
| ~      | 1. Policy has no impact<br>2. Effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant (this is indicated in comments) |
| ?      | Uncertain or insufficient information on which to determine base the assessment at this stage  |
| X      | Policy appears to conflict with the objective and may result in adverse impacts  |
| XX     | Potentially significant adverse impact   |
| XXX    | Strong and significant adverse impact  |

<sup>7</sup> Reference as for footnote 2, specifically FAQ8.



**Table 3: Assessment scoring example**

| Sustainability Appraisal Objectives<br>[abridged in some cases]                                     | Assessment period |      |      |
|---|-------------------|------|------|
|   | Short             | Med. | Long |
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~                 | ~    | ~    |
| 2 Reduce the risk of flooding and its consequences  | ~                 | ~    | ~    |
| 3 Improve health and well-being, and reduce health inequalities                                     | √√                | √√   | √√   |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | (√)               | (√)  | (√)  |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | √                 | √    | √    |
| 6 Reduce crime and the fear of it   | √                 | √    | √    |
| 7 Create and sustain vibrant, distinctive communities   | √√                | √√   | √√   |
| 8 Provide accessible essential services and facilities  | √√                | √√   | √√   |
| 9 Provide accessible culture and recreation facilities  | √√                | √√   | √√   |
| 10 Improve efficient land use, design, layout and reduce contamination                              | ~                 | ~    | ~    |
| 11 Reduce air pollution and improve air quality where possible                                      | ~                 | ~    | ~    |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change          | ~                 | ~    | ~    |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                   | ~                 | ~    | ~    |
| 14 Protect and enhance the Borough's heritage and archaeological assets                             | ~                 | ~    | ~    |
| 15 Improve travel choice, reducing car usage, traffic and congestion                                | ~                 | ~    | ~    |
| 16 Promote sustainable use of resources   | ~                 | ~    | ~    |
| 17 Maintain and improve recycling and other waste minimisation measures                             | ~                 | ~    | ~    |
| 18 Maintain and improve the quality of water resources  | ~                 | ~    | ~    |
| 19 Conserve and improve soil resources  | ~                 | ~    | ~    |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources  | ~                 | ~    | ~    |
| 21 Ensure high and stable employment levels, and sustain competitiveness                            | ~                 | ~    | ~    |
| 22 Encourage smart economic growth  | ~                 | ~    | ~    |
| 23 Develop and maintain a skilled workforce   | ~                 | ~    | ~    |

|    |                            |     |                            |     |                          |
|----|----------------------------|-----|----------------------------|-----|--------------------------|
| √√ | Strong beneficial impact   | (√) | Possible beneficial impact | X   | Moderate negative impact |
| √  | Moderate beneficial impact | ~   | No (or neutral) impact     | X X | Strong negative impact   |

For each policy:

- The nature, duration and relative significance of impact on each SA objective was assessed using the system shown above, with commentary on every impact or area of uncertainty.
- A summary of the assessment, together with mitigation proposals (usually a proposed change to policy text).
- Observations on likely secondary, cumulative or synergistic impacts of the policy.

### 3.2.3 *Assessing the significance of plan impacts*

The assessment framework summarised above provides an initial, qualitative assessment of the relative duration and significance of policy impacts. However it was not possible to push this assessment further to quantify levels of significance in comparison to established models or examples.

Most of the SPD policies cannot be assessed in terms of their spatial impact at present. Some, such as policy 7 on town centre improvements, identify the area where infrastructure and other improvements would be located. However the actual impact of this investment will depend entirely on which projects are taken forward, and when. Moreover the rate at which contributions are generated depends on the rate of new planning applications, the nature, size and location of which cannot be estimated at present.

This situation prevents us from providing impact assessments of the nature envisaged by the guidance (which applies across all plan types including those which have site-specific allocations, where impact assessment may be possible). Instead we have inferred that the initial qualitative assessment of plan impacts – in terms of their effect on the SA objectives – has been taken as a proxy for their likely impact in the Borough.

This solution is some way from the nature of assessment envisaged by the guidance, but it is consistent with the approach adopted for the SA / SEA of other authorities' plans. It is unavoidable for spatial planning documents in which the policies have no spatial expression. Moreover the recently issued interim guidance acknowledges that "*significance has to be determined individually in each case*", that "*the effort expended to assess significance should be proportionate to the expected severity of the effect*", and that "an attempt at quantifying qualitative and semi-quantitative impacts will not lead to an increase in objectivity"<sup>8</sup>.

In these circumstances it may be appropriate to interpret the effect of these policies as "important" rather than "significant" as this implies a level of quantified assessment more typical of that undertaken in Environmental Impact Assessment (EIA).

### 3.2.4 *Assessing cumulative and other impacts*

Equally, policies that have no spatial context cannot have a genuine cumulative impact. Nevertheless overarching policies have a repetitive impact as more and more planning proposals generate more and more contributions. In the broadest sense the effects of some policies will be complementary. For example, those improving cultural facilities, provision of library services, etc. will contribute to the objective of "*making opportunities for culture, leisure and recreation readily accessible*" (SA objective 9).

Whether this constitutes a cumulative (positive) impact as envisaged by the guidance, and whether this definition is consistent with that used in EIA remains open to question. However the assessment approach adopted here documents any such impacts – whether cumulative, or perhaps 'collective' – and indeed many policies appear to offer secondary benefits on a range of objectives.

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<sup>8</sup> Reference as for footnote 2, specifically FAW5 (all quotations).

### **3.2 Who carried out the SA, and when**

The Council completed its Scoping Report for the LDF in April 2005, completing consultation and amendment of the report at the end of this period.

Scott Wilson undertook the assessment of the SPD in June 2005, the results of which were reviewed initially by officers in the Council's Planning Department prior to this Report being presented for consultation.

### **3.3 Who was consulted about the SA**

The SA Framework used in the assessment is taken from the Council's Scoping Report, which has been subject to a consultation process involving the statutory environmental consultees, other principal bodies with landowning or management responsibilities in the Borough (eg. National Trust, Crown Estates), neighbouring local authorities, and a range of local stakeholders including social services, welfare, housing and other representative bodies<sup>9</sup>.

This Report has been prepared in advance of consultation on the SPD, and will be presented in support of the draft document. It is understood that this second consultation will involve a comparable range of stakeholders.

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<sup>9</sup> Royal Borough of Windsor & Maidenhead, Core Strategy & Policies DPD Sustainability Appraisal Scoping Report, April 2005, pp. 25-26.

## **4 SUSTAINABILITY OBJECTIVES, BASELINE & CONTENT**

Full details of the evidence gathered by the Council on the legislative background and current environmental, economic and social conditions in the Borough are documented in its Scoping Report, the content of which and its relation to the SPD has been discussed in section 2.3. For convenience and completeness, this section briefly summarises the main points from the document.

### **4.1 Links to other plans, programmes & strategies**

The review of legislation and other programmes relevant to the Core Strategy DPD and the initial LDF (which includes the SPD) identified a range of key requirements. The full details are provided in the Scoping Report. Most of the requirements will be implemented through Core Strategy policies therefore it is not considered necessary to detail them here as well.

### **4.2 Overview of baseline conditions in the District**

The Borough sustainability baseline dataset is detailed in full in the Scoping Report and the main issues identified in it are listed below.

- Affordable housing completions have declined since the late 1990s
- The number of households on the Housing Register is increasing, reflecting a recent trend which is being worsened by the widening gap between incomes and house prices
- House prices have been rising lower than national levels in recent years but remain very high in absolute terms
- Apparent increase in crime rates (though there are concerns about the accuracy and/or objectivity of the data)
- Moderately high levels of fear of crime are being maintained (although this has not been corroborated with a Borough survey)
- Slight increase in car commuting
- Waste recovery and composting rates are below national target levels (and these will get more stringent in the second half of the decade)
- Waste collection rate (ie. waste generated perm household) is above the national average
- Unusually high number of people claiming unemployment benefit in some form (attributed to the relatively high number of early retirees in the Borough)
- Labour productivity is declining compared to similar regions elsewhere in Europe (this is a regional issue and not specific to the Borough)
- The local economy has grown at twice the national rate over the last 15 years, implying problems coordinating employment and housing as well as increased pressure on infrastructure and public services.

### **4.3 The SA Framework**

The assessment uses the SA Framework developed for the appraisal of the Council's Core Strategy. Current guidance permits local authorities to use a common Scoping Report in the assessment of all documents in the initial LDF.

The SPD contains policies which are complementary and supportive to those in the Core Strategy, and it is an instrument for implementing the policies it contains. It is therefore appropriate to use the Core Strategy SA Framework to assess the policies in the SPD. GO-SE has confirmed this approach is compliant with current guidance.

The Framework is presented in Annex A of this report and contains 23 objectives, most of which concern the environmental and social issues in the Borough. The high recent level of growth noted in the summary of baseline conditions (see 4.2 above) suggests it is reasonable that economic objectives should have a lower priority.

## 5 PLAN ISSUES & OPTIONS

### 5.1 Introduction

SPDs typically contain policies which amplify or define more precisely the way policies in the Core Strategy will be implemented. Current guidance states that it is unnecessary for the SA of the SPD to re-assess the policies which it helps to implement, but that it is necessary to evaluate a “do nothing” policy which assesses the likely impact if the SPD is not implemented<sup>10</sup>.

As discussed in section 3.2.1, the assessment has been expanded to include two existing policies which provide the “do nothing” comparison for the SPD.

The assessment of these policies uses the approach summarised in section 3.2, and the detailed scoring and comments are attached in Annex B.

### 5.2 Comparison of the effects of the options

#### 5.2.1 Assessment of policy IMP1

IMP1 provides only a general statement of:

- The Council’s intention to seek contributions
- Contributions would cover infrastructure, services, facilities and amenities
- In some circumstance the Council may seek financial contributions instead.

In contrast the draft SPD provides a more comprehensive statement of the nature of contributions that would be sought, the levels the Council would seek and, in the accompanying Developers’ Guide, a justification for the contribution based on current planning policy.

The principal changes implemented through the draft SPD will be:

- Greater transparency in the contributions that will be sought and the rationale for seeking them.
- Strengthening of the Council’s powers to seek **affordable housing**; a clearer specification of the threshold above which it would be sought; and the level of provision required (the existing affordable housing SPG does not specify the latter).
- Adjustment of the calculation method for **transport and highways** contributions that improve transparency and which are consistent with policy of other local authorities.
- Clarification of the method for calculating contributions for **open space and recreation** facilities.
- Adjustment of the rate for calculating **education** contributions which reduces the rate for smaller properties, reflecting the reduced number of children likely to be resident.
- Adjustment of education contributions to reflect the latest costs issued by DES

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<sup>10</sup> Reference as for footnote 2, FAQ7.

- Adjustment of education contributions so that different levels are sought which reflect the amount of spare capacity (or lack of it) in local schools.
- Extension of the distance between the development site and **community facilities** potentially increasing the number of applications where contributions might be sought.
- Amendment of the scope to seek contributions to **library services**, recognising that the Council is obliged to provide this facility even for those not resident in the Borough, and recognising that new employment sites could contribute to demand for these services.
- Slight adjustment of the method of calculating **town management** contributions.
- A new contribution towards **economic development** initiatives which will assist in improving skills in the Borough's workforce.
- Introduction of a sliding scale for contributions to **public art** replacing case-by-case negotiation.
- Incorporation of funding for **parish projects** to provide a new source of finance.
- A new contribution towards **waste management** projects which reflects the need for action to meet recycling and waste minimisation targets.

The assessment has not had access to information about the volume and type of contributions which the Council has secured in the recent past under the terms of policy IMP1. Nevertheless the draft SPD offers several improvements in terms of:

- Greater transparency of the contributions, reason and method of calculation, some of which has been motivated by appeals against those levied under the preceding system;
- Updating of the calculation approach where recent data suggests this is warranted;
- Adding new contributions to extend the situations where it is legitimate and appropriate to seek funding.

The first of these points is the most important insofar as it indicates the Council has adjusted the contributions system to deal with recent problems, adopting a more open approach for many areas, but continuing to negotiate on a case-by-case basis in some situations.

The second point is largely procedural and ensures that the revised approach reflects current conditions or recent data. It ensures the Council levies an appropriate contribution based on the most recent data available, and this helps to ensure that developers are treated fairly irrespective of the type of contribution being sought.

The principal issue raised in the assessment is that the SPD makes clear the extent contributions that the Council might seek from a developer. The volume and type sought will continue to be negotiated on a case-by-case basis, using the material in the SPD as a starting point and to ensure a consistent approach is adopted for different developments.

Nevertheless there is a concern that transparency shows the potential range and number of contributions that could be sought, and that this might act as a disincentive to developers, particularly affecting housing. For education, transport, community facilities and library services alone these sums can exceed £2700 per dwelling.

Notwithstanding the lack of information about recent contributions, it has been assumed that the SPD will make modest adjustments to the existing policy approach. Nevertheless the greater transparency it offers does not compromise the Council's opportunity to seek appropriate contributions and provides developers with a clearer indication of the likely funding implications. It must be concluded that the SPD improves the approach to this area of policy and that it is superior to the 'Do Nothing' approach of persisting with policy IMP1.

### 5.2.2 *Assessment of affordable housing policy (policy H3)*

The "do nothing" comparison for affordable housing policy is the existing SPG on this area, which was published in 1999, and which is based on what became policy H3 in the adopted Borough Plan

Compared to IMP1 this area of policy is more fully defined, with the SPG presenting the case for seeking affordable housing contributions (primarily as housing stock, but possibly as a financial contribution) on developments below the size threshold proposed in national planning policy.

The principal difference between the SPD and its predecessor is that the current document makes clear the proportion of affordable housing (30%) that would be sought for each development where the contribution applies.

SPG Policy 1 takes forward this approach with no substantial modification. This approach is justified by the continuing problems of a lack of affordable housing in the Borough, and by further widening of the gap between house prices and incomes in the period since the SPG was published.

This raises the issue of whether the Council might consider lowering the threshold for contributions further. However in the light of the range of other funding being sought, and the concerns expressed in the preceding section, it may be inadvisable to do this.

Therefore the SPD improves the transparency of this policy, making developers aware of the likely contribution earlier in the planning process. However the policy currently applies to developments of >0.5ha. or of 15 or more dwellings. It is essential that continued use of this size threshold does not lead to a 'salami-slicing' approach whereby developable sites are brought forward in separate phases, each one being smaller than the threshold.



## **6 PLAN POLICIES**

### **6.1 Assessing the policies**

The policies in the SPD, and existing policies IMP1 and H3 were assessed using the SA Framework and based on the approach outlined in section 3.2. The full assessments, containing scoring and comments about the performance of each policy against the 23 objectives in the SA Framework, are provided in Annex B.

The impact of the SPD is clearly positive, although this is to be expected of policies that seek improvements to infrastructure, community services and amenities as well as natural assets. In most cases the policy clearly addresses and supports a single objective in the SA Framework, but it has potential secondary benefits on a number of others that will vary with the type of infrastructure project that it supports.

Assessment identified a single negative 'impact' in policy IMP1, which does not provide clear scope for contributions that would result in habitat and biodiversity improvements. This is not strictly an impact, more an opportunity not taken; and it will be rectified by policy 8 in the draft SPD.

Otherwise most of the policies support at least one of the SA objectives strongly. However the lack of spatial extent of the policies (ie. we do not know which of the nominated schemes would be implemented as a result of Section 46 agreements or planning obligations) has made it difficult to assess the level of significance of its impact, and this point is discussed more below.

One possible issue concerns the balance between the economic, social and environmental objectives of the SA Framework and the wider LDF. The 14 policy areas listed in section 2 shows a clear focus on social (ie. community) and some forms of environmental requirements. Developer contributions are generated from housing and employment sites and are therefore a consequence of economic growth. Consequently the lack of policies with an economic focus is consistent with the nature and purpose of the SPD.

### **6.2 Significant effects of the policies**

The discussion in section 3.2.3 identifies the problems of assessing the significance of the impacts of the SPD policies as they have no spatial extent until they are applied in response to a development proposal.

Table 4 summarises the results of the detailed assessments as an attempt to illustrate the potential importance (if not significance) of the policies. In most cases the assessment identified a possible impact but these may often be secondary effects and cannot be considered significant (or important) without more detail of how the policy would be applied. Nevertheless, the pattern of impacts is very predictable and unsurprising given the nature of the policies.

Table 4 therefore only shows those impacts where it is reasonable to assume the policy will have a potentially significant effect. This is the case with IMP1, which is expressed in such broad terms that it is difficult to determine what impact it might have. Table 4 shows that the SPD improves the transparency of this area of policy in terms of where contributions might be sought and the impact this might have.

**Table 4: Significant / important impact assessment matrix**

| Policy area              | KEY: |   |   | Likely positive significant impact |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   |                 | Possible positive significant impact |                  |                      |          | Likely negative significant impact |                   |                      |                      |                    |                      |
|--------------------------|------|---|---|------------------------------------|--------------|-----------------------|-----------------------|----------------------|-------------------------|-----------------------|-----------------------|------------------------|----------------------|------------------|-------------------|-----------------|--------------------------------------|------------------|----------------------|----------|------------------------------------|-------------------|----------------------|----------------------|--------------------|----------------------|
|                          | ✓    | ✓ | ✓ | 1 Housing                          | 2 Flood risk | 3 Health & well-being | 4 Poverty & exclusion | 5 Education & skills | 6 Crime & fear of crime | 7 Vibrant communities | 8 Accessible services | 9 Culture & recreation | 10 Land use & design | 11 Air pollution | 12 Climate change | 13 Biodiversity | 14 Heritage assets                   | 15 Travel choice | 16 Natural resources | 17 Waste | 18 Water resources                 | 19 Soil resources | 20 Energy efficiency | 21 Employment levels | 22 Economic growth | 23 Skilled workforce |
| IMP1 [adopted]           |      |   |   | ✓                                  |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| H3 [adopted]             |      |   |   | ✓                                  |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 1 Affordable housing     |      |   |   | ✓                                  |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 2(i) Travel plans        |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 2(ii) Highways           |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 3 Education              |      |   |   |                                    |              |                       |                       | ✓                    |                         |                       |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    | ✓                    |
| 4 Community facilities   |      |   |   |                                    |              |                       |                       |                      |                         | ✓                     |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 5 Library services       |      |   |   |                                    |              |                       |                       |                      |                         |                       | ✓                     |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 6(i) Indoor sports       |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       | ✓                      |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 6(ii) Public art         |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       |                        | ✓                    |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 6(iii) Open space        |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       |                        |                      | ✓                |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 7 Town management        |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       |                        |                      |                  | ✓                 |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 8 Biodiversity           |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   | ✓               |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 9 Air quality            |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 10 Waste disposal        |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 11 Archaeology           |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 12 Flood risk & drainage |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |
| 13 Parish projects       |      |   |   |                                    |              |                       |                       |                      |                         |                       |                       |                        |                      |                  |                   |                 |                                      |                  |                      |          |                                    |                   |                      |                      |                    |                      |

Table 4 shows that some objectives are not addressed by the SPD, but this is to be expected. The objectives in the SA Framework are an evaluation structure for the LDF as a whole, whereas obligations and contributions can only be sought to address certain areas of policy. In particular it is difficult to identify ways in which this planning instrument can be used to influence economic growth directly.

### 6.3 Proposed mitigation measures

With little detail about the likely timing and location of the effects of the policies, the appropriate mitigation proposals are restricted to recommended changes to the text of the SPD or to the companion Developers' Guide. These are listed in Table 5.

**Table 5: Mitigation measures and proposed changes**

| Objective             | Proposed measure(s)  |
|-----------------------|--|
| 1 Housing             | Consider transferring statements from the Developers' Guide to the policy clarifying the use of a case-by-case assessment, and priority attached to on-site provision.   |
| 2(i) Travel plans     | Incorporate mention of transport assessment; include a size-based criterion so costs do not apply to small commercial development; and include possible contribution of public transport serving the site.   |
| 3 Education           | Possibly indicate whether special circumstances apply to ethnic minority schooling (this would adjust the Developers' Guide rather than the policy text).  |
| 4 Communal facilities | Again, possibly clarify in the Developers' Guide how the Council will maintain and modify the list of schemes especially as they would apply to more deprived areas of the Borough.  |
| 5 Library services    | Ensure policy text makes clear the Council's intention to seek contributions from commercial development, not just housing.  |
| 6(i) Indoor sports    | Consider extending scope of policy to include some A-class land uses which would also generate substantial new employment.   |
| 6(ii) Public art      | Consider whether the distance limit is appropriate since public art benefits all the community not just those closest to town centres.   |
| 7 Town management     | Possibly use this policy to fund waste collection facilities in town centres. Also the policy applies to commercial development only so the policy reference to a contribution per dwelling is erroneous.  |
| 10 Waste disposal     | Adjust the policy so it applies to smaller commercial developments which are less likely to use private sector waste disposal. For larger developments the Council could also seek to link contribution to the production of a waste management/reduction plan by the developer or occupier. |

## 6.4 Secondary impacts

Most of the projects and schemes (apart from some of those in the highways policy) are small. Some are bound to have localised impacts which may go undetected if the scheme is so small that it does not require Environmental Impact Assessment.

Clearly the effects of these schemes is overwhelmingly positive, but there may be cases where implementing a project may have a localised adverse impact. For example, expansion of recreational open space (whether funded by a developer contribution or some other source) should be allowed to have an adverse impact on nature conservation designations, notably the important Thames Basin Heath Special Area of Conservation

Therefore the SPD has a very substantial number of potential secondary impacts which result not from the plan itself, but as a result of the funds it generates and how these are used. It is therefore essential that the Council implements an appropriate 'safety net' to ensure potentially important local adverse impacts are avoided. This issue is discussed further in section 7.1.

## 6.4 Uncertainties & risks

The principal uncertainty is the inability to predict the likely consequences of these policies, once they are translated into real infrastructure or financial contributions. This uncertainty has three components:

- *Spatial*. As noted in section 3.3, the lack of spatial expression means that the physical and visual impacts in particular cannot be determined in the manner that would be provided by an EIA.
- *Sustainable Balance*. As noted in section 6.1, the SPD policies focus on social and environmental improvements, with slightly greater emphasis on the former. At this time the assessment cannot determine whether the contributions generated by it will have the same balance. Planning obligations and Section 46 agreements provide a valuable means of securing funding for environmental improvements, particularly for habitat and biodiversity schemes, though it would be easy to overlook these needs in the light of the Borough's problems with affordable housing supply in particular. It will be the Council's responsibility to ensure that the range of contributions sought is balanced across the various policy areas.
- *Sustainable Distribution*. Equally the Council will need to ensure the benefits of this policy are spread proportionally across the District. Section 46 contributions are subject to several tests of applicability, in that they must be reasonable in scale, appropriate in type and in location. They will be sought for development that is primarily in urban areas, and this means that much of the resulting benefit will accrue to Maidenhead, Windsor, and other larger settlements. This may mean that rural areas of the Borough where there is little development will create few opportunities to generate contributions that can be invested in local improvements. Therefore the Council will need to ensure that Section 46 contributions or other funding is available for such projects so that the needs of the rural part of the Borough are catered to.

The lack of spatial extent of the policies, and inability to determine their likely impact 'on the ground' means that appropriate measures must be put in place to ensure that unforeseen effects do not occur. This issue is discussed further in the final section.

## 7 IMPLEMENTATION

### 7.1 Links to other tiers of plans & programmes

The relationship between the SPD and preceding policies, the LDF and Core Strategy DPD, and other preparatory documents (specifically the Scoping Report) has been identified in sections 2.3 and 3.2. These documents only inform the content of the SPD and the approach to the assessment; but they do not determine how the plan itself is implemented.

#### *Links to the LDF*

ODPM guidance on the preparation of the Local Development Framework make clear that the purpose of an SPD is “*expand policy or provide further detail to policies in a development plan document*”.<sup>11</sup> This SPD is being prepared in parallel with the Borough’s Core Strategy DPD and at present we do not have details of the policies it will contain. In order that there is a compliant link between the SPD and the DPD it is essential that the latter includes an overarching policy on planning obligations and developer contributions, which:

- Supersedes policy IMP1 in the adopted Borough Plan;
- Indicates the type of development where contributions will be sought (in practice, all types), and the nature of what will be sought (ie. the 14 areas listed in section 2.2).

#### *Links to planning applications and assessing the impact of development*

The draft SPD contains more than 400 examples of projects which may be funded from contributions in due course. The decision on which ones will be taken forward has not been made, and the SPD does not indicate priorities. As noted previously, this situation means that this assessment cannot determine the likely impacts of the policies on the ground; it can only surmise their likely effect in general terms. However this does not obviate the need for controls to ensure that unwanted impacts are avoided once a scheme is progressed.

A few schemes in the SPD will add moderate-sized new infrastructure, and these projects may fall within the scope of EIA as defined by current guidance<sup>12</sup>. This should ensure that adverse impacts are minimised. The remainder are minor schemes and their impact will be localised but some form of control will still be necessary. For example, schemes which introduce outdoor leisure facilities or increase traffic in the proximity of the Thames Lowland Heath Special Area of Conservation will need to be subject to scrutiny to ensure they do not lead to an excessive increase in visitor levels or traffic which could be detrimental to the site.

It is therefore essential there are procedures or other instruments in place to ensure potential impacts are identified and mitigated once the location and nature of a project is determined. Where EIA does not provide this function we would expect policies in the Council’s Core Strategy and Development Control Policies DPD will provide such controls. These would address issues

<sup>11</sup> ODPM, Local Development Frameworks, PPS12, 2004, para. 2.43.

<sup>12</sup> DETR, Environmental Impact Assessment: a guide to procedures, November 2000, Annex II.

such as design principles, impact on conservation areas, impact on habitats and biodiversity assets, etc.

Therefore it is essential that the SPD makes clear that development made possible from contributions and obligations would be subject to these controls.

## **7.2 Monitoring proposals**

As noted previously, the SPD is being developed in parallel with the Core Strategy DPD, for which the Council will prepare a monitoring programme which provides for regular collection and review of indicator data to assess how well the plan is performing. As the generic policy areas and scope of the SPD is consistent with the DPD, it would be expected to benefit from the same monitoring programme, and there appears little justification for a separate approach.

However it will be necessary to undertake further monitoring of this policy in several ways:

- To monitor the volume and source of contributions, and the extent to which it contributes to the projects and funding needs listed in the SPD;
- To monitor the spatial location of how contributions are realised and / or invested, to ensure the distribution is as equitable as possible (ie. that rural communities are not denied funding because there is no development nearby);
- To monitor the proportion of contributions generated by the different policies to ensure that there is an appropriate balance between funding for social / community schemes and those which either improve the environment or which prevent adverse impacts.





## **ANNEX A: THE SUSTAINABILITY APPRAISAL FRAMEWORK**



### Sustainability Objectives

|                                  |           |  |
|----------------------------------|-----------|--|
| <b>Social Objectives:</b>        | <b>1</b>  | Meet local housing needs by ensuring that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.     |
|                                  | <b>2</b>  | Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.                               |
|                                  | <b>3</b>  | Improve the health and well-being of the population and reduce inequalities in health.   |
|                                  | <b>4</b>  | Reduce poverty and social exclusion and close the gap between the most deprived areas and the rest.  |
|                                  | <b>5</b>  | Raise educational achievement levels and develop the opportunities for everyone to acquire new skills.                                       |
|                                  | <b>6</b>  | Reduce and prevent crime and the fear of crime.  |
|                                  | <b>7</b>  | Create and sustain vibrant and distinctive communities.  |
|                                  | <b>8</b>  | Provide accessible essential services and facilities.  |
|                                  | <b>9</b>  | Make opportunities for culture, leisure and recreation readily accessible.   |
| <b>Environmental Objectives:</b> | <b>10</b> | Encourage urban renaissance by improving efficiency in land use, design, layout and reducing contamination.                                  |
|                                  | <b>11</b> | Reduce air pollution and improve it where possible.  |
|                                  | <b>12</b> | Address the causes of climate change through reducing emissions of greenhouse gases and ensure the borough is prepared for its impacts.      |
|                                  | <b>13</b> | Conserve and enhance the borough's biodiversity and to ensure protection of designated habitats and species.                                 |
|                                  | <b>14</b> | Protect and enhance the borough's buildings, sites and features of archaeological, historical or architectural interest and their settings.  |
|                                  | <b>15</b> | Reduce the need to travel by car, improve travel choice, reduce levels of road traffic and congestion.                                       |
|                                  | <b>16</b> | Sustainable use of resources.  |
|                                  | <b>17</b> | Maintaining and improving opportunities for reducing waste transferred to landfill through recycling and other wastes minimisation measures. |
|                                  | <b>18</b> | Maintain and improve the quality of all water resources.   |
|                                  | <b>19</b> | Conservation and improve soil resources and quality.   |
|                                  | <b>20</b> | Increase energy efficiency and the proportion of energy generated from renewable sources in the borough.                                     |
| <b>Economic Objectives</b>       | <b>21</b> | Ensure high and stable levels of employment and sustain the economic growth and competitiveness of the borough.                              |
|                                  | <b>22</b> | Encourage smart economic growth.   |
|                                  | <b>23</b> | Develop and maintain a skilled workforce.  |



## **ANNEX B: POLICY ASSESSMENT SUMMARIES**



## INTRODUCTION

This Annex details the result of the evaluation of the principal policies comprising the Developer Contributions Supplementary Planning Document (SPD) which has been prepared by the Royal Borough of Windsor & Maidenhead. The assessment has been expanded to include two further policies: one from the adopted Local Plan; the other from an existing Supplementary Planning Guidance document which was published in 2003. The reason for including these documents is explained in the main report.

Each policy is assessed in terms of the nature of its impact (this can be: positive / negative / neutral / cannot be determined without further data); its relative magnitude (ie. significance); and its duration. The symbols used in the assessments are explained below.

| Symbol | Likely effect against the SA Objective   |
|--------|--|
| √√√    | Strong and significant beneficial impact   |
| √√     | Potentially significant beneficial impact  |
| √      | Policy supports this objective although it may have only a minor beneficial impact   |
| ~      | Policy has no impact or effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant |
| ?      | Uncertain or insufficient information on which to determine base the assessment at this stage                                      |
| ~X     | Policy appears to conflict with the objective and may result in adverse impacts  |
| ~XX    | Potentially significant adverse impact   |
| XXX    | Strong and significant adverse impact  |

Brackets are used primarily to show slow change in the impact – eg. in the sequence: + / +(+) / ++. However in a small number of cases they are used as follows (+++) to indicate a likely impact which must be qualified because of lack of information at present.

Each policy is assessed against the 23 objectives in the Council's SA Framework. Each table is followed by a summary of the principal issues identified in the assessments, and a summary outlining proposed mitigation measures and likely cumulative (and other) impacts. When reviewing this document we recommend you begin with these summaries and consult the detailed markings to obtain more information on comments or issues which may be of specific interest.

**ADOPTED LOCAL PLAN – DEVELOPER CONTRIBUTIONS POLICY****Local Plan Policy IMP1 – Developer Contributions**

**States the Council's intention to seek contributions for all additional infrastructure made necessary by a development, where this is directly related to the new land use. The policy provides scope for provision of infrastructure or for the Council to seek financial contributions instead.**

**Sustainability Appraisal Objectives****Comments / Proposed Mitigation**

| [abridged in some cases]  | Assessment |      |     | Long |
|---|------------|------|-----|------|
|   | Short      | Med. | ?   |      |
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ?          | ?    | ?   | ?    |
| 2 Reduce the risk of flooding and its consequences  | ~          | ~    | ~   | ~    |
| 3 Improve health and well-being, and reduce health inequalities                                     | (√)        | (√)  | (√) | (√)  |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ?          | ?    | ?   | ?    |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | (√)        | (√)  | (√) | (√)  |
| 6 Reduce crime and the fear of it   | ~          | ~    | ~   | ~    |
| 7 Create and sustain vibrant, distinctive communities   | ~          | ~    | ~   | ~    |
| 8 Provide accessible essential services and facilities  | (√)        | (√)  | (√) | (√)  |

Although the Council relies on developer contributions to deliver affordable housing, the adopted policy focuses on infrastructure, although para. 8.5.1 indicates the intention to seek agreements with developers to meet housing needs.

Not addressed, but infrastructure requirements would be mandated by PPG25.

Provision of community facilities assumed to be included.

Aim of policy is to prevent imbalances because infrastructure supply does not grow at same pace as demand. Shortages could be more keenly felt by the Borough's more disadvantaged residents, though this is difficult to substantiate given the very broad nature of the policy.

Provision of educational infrastructure assumed to be included.

Reduce crime and the fear of it

Not evident the policy aims for this as its primary aim is to prevent the overloading or lack of capacity in infrastructure.



|  |     |     |     |     |   |
|--|-----|-----|-----|-----|---|
| 9 Provide accessible culture and recreation facilities   | (√) | (√) | (√) | (√) | It is not clear whether these would be priorities of this policy, although it could include open space for leisure or improvement of existing recreational infrastructure.  |
| 10 Improve efficient land use, design, layout and reduce contamination                             | ~   | ~   | ~   | ~   |   |
| 11 Reduce air pollution and improve air quality where possible                                     | ~   | ~   | ~   | ~   |   |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change         | ?   | ?   | ?   | ?   | See objective 15.   |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                  | (X) | (X) | (X) | (X) | Not clear that habitat improvement schemes could be funded by this mechanism, where this is relevant to the development.  |
| 14 Protect and enhance the Borough's heritage and archaeological assets                            | ~   | ~   | ~   | ~   | Improvements most likely to affect cultural heritage components – see objective 9.  |
| 15 Improve travel choice, reducing car usage, traffic and congestion                               | (√) | (√) | (√) | (√) | Could be positive if contributions are sought – for example – to establish and initially subsidise new public transport schemes linking developments to service centres, and which improve access for other residents along the route.  |
| 16 Promote sustainable use of resources  | ~   | ~   | ~   | ~   |   |
| 17 Maintain and improve recycling and other waste minimisation measures                            | ?   | ?   | ?   | ?   | Not clear whether these facilities would be delivered through this mechanism.   |
| 18 Maintain and improve the quality of water resources   | ~   | ~   | ~   | ~   |   |
| 19 Conserve and improve soil resources   | ~   | ~   | ~   | ~   |   |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources | ~   | ~   | ~   | ~   | (Assessment assumes this objective would be addressed through design codes as part of Development Control policy.)  |
| 21 Ensure high and stable employment levels, and sustain competitiveness                           | ~   | ~   | ~   | ~   | See below.  |
| 22 Encourage smart economic growth   | (√) | (√) | (√) | (√) | There is a link between using contributions to secure affordable housing and the opportunity to retain and attract a range of semi-skilled, skilled, key and intermediate workers without whom it will be difficult to maintain an appropriate balance between growth in the local economy and its supporting infrastructure. |
| 23 Develop and maintain a skilled workforce  | (√) | (√) | (√) | (√) | As above.   |

**Summary of assessment:** It is not possible to judge whether this policy is more or less sustainable than the SPD which supersedes it. However it is much less detailed or prescriptive and therefore provides a less transparent statement of the Council's intentions. This issue is not addressed specifically by any of the SA objectives but is not consistent with the requirements of the new planning regime which encourages more openness in the planning and decision-making process. Moreover its very general nature makes it difficult to assess the extent to which it meets the specific objectives of the SA Framework.

**Summary of mitigation proposals:** [Irrelevant as it will be superseded by the SPD].

**Secondary, cumulative or synergistic effects:** [Irrelevant as it will be superseded by the SPD].

**ADOPTED LOCAL PLAN – AFFORDABLE HOUSING POLICY****Local Plan Policy H3 – Affordable Housing**

The core policy text states the Council's intention to seek contributions to affordable housing provision within urban areas and defines the thresholds above which this will apply. The assessment is based on the Supplementary Planning Guidance (SPG) document which expands and justifies the background to the Council's approach. Although the SPG was published in March 1999 this policy has not been superseded by policies in the Borough Plan and it informs policy area 1 of the Developer Contributions SPD.

**Sustainability Appraisal Objectives  
[abridged in some cases]**

**Comments / Proposed Mitigation**

**Assessment**

**Short Med. Long**

|   |     |     |     |   |
|---|-----|-----|-----|---|
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | √√√ | √√√ | √√√ | The joint primary aim of the policy. The SPG make clear that the Borough was given dispensation by the government to set a lower threshold for provision in order that the identified severe shortage of this type of housing would be addressed. |
| 2 Reduce the risk of flooding and its consequences  | ~   | ~   | ~   | Potential benefits where affordable housing replaces poor quality housing which may indirectly contribute to health problems.   |
| 3 Improve health and well-being, and reduce health inequalities                                     | √   | √   | √   | The other primary aim of the policy, in the light of the level of under provision identified in the original Housing Needs Survey.  |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | √√√ | √√√ | √√√ | Not addressed specifically but in principle the policy addresses a problem which can adversely affect the community.  |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | ~   | ~   | ~   | (Policy does not specify design issues, size mix, etc.).  |
| 6 Reduce crime and the fear of it   | ~   | ~   | ~   |   |
| 7 Create and sustain vibrant, distinctive communities   | ~   | ~   | ~   |   |
| 8 Provide accessible essential services and facilities  | ~   | ~   | ~   |   |
| 9 Provide accessible culture and recreation facilities  | ~   | ~   | ~   |   |
| 10 Improve efficient land use, design, layout and reduce contamination                              | ~   | ~   | ~   |   |
| 11 Reduce air pollution and improve air quality where possible                                      | ~   | ~   | ~   |   |

|   |   |   |   |
|---|---|---|---|
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change  | ~ | ~ | ~ |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species   | ~ | ~ | ~ |
| 14 Protect and enhance the Borough's heritage and archaeological assets   | ~ | ~ | ~ |
| 15 Improve travel choice, reducing car usage, traffic and congestion  | ~ | ~ | ~ |
| 16 Promote sustainable use of resources   | ~ | ~ | ~ |
| 17 Maintain and improve recycling and other waste minimisation measures   | ~ | ~ | ~ |
| 18 Maintain and improve the quality of water resources  | ~ | ~ | ~ |
| 19 Conserve and improve soil resources  | ~ | ~ | ~ |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources  | ~ | ~ | ~ |
| 21 Ensure high and stable employment levels, and sustain competitiveness  | ~ | ~ | ~ |
| 22 Encourage smart economic growth  | ~ | ~ | ~ |
| 23 Develop and maintain a skilled workforce   | ~ | ~ | ~ |
| <b>Summary of assessment: A straightforward policy defining the requirement for affordable housing provision on a greater scale (as a result of a lower threshold at which it would apply) than that required by planning policy.</b> |   |   |   |
| <b>Summary of mitigation proposals: None identified.</b>  |   |   |   |
| <b>Secondary, cumulative or synergistic effects: None identified.</b>   |   |   |   |

**DRAFT SPD – PROPOSED POLICIES****1 Affordable Housing**

**Proposes to seek affordable housing provision of at least 30% of newly completed dwellings on developments of 0.5ha. or more (typically 15 or more dwellings) in urban areas.**

**Sustainability Appraisal Objectives  
[abridged in some cases]**

**Comments / Proposed Mitigation**

**Assessment**

**Short Med. Long**

1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home

√√

√√(√)

√√√

Clearly the principal objective of this policy. Marking illustrates the cumulative impact over time given the shortages noted in the Scoping Report. The thresholds would apply the contribution to relatively small sites, but without detail of recent housing project it is not possible to assess whether it is necessary to apply the policy to windfall sites. Based on other plans, the target level of 30% (minimum) appears realistic, aiming to balance the need to increase stock without setting the provision at a level that could penalise developers and provide a disincentive to bringing forward some schemes.

2 Reduce the risk of flooding and its consequences

~

~

~

3 Improve health and well-being, and reduce health inequalities

(√)

√

√(√)

Scoping Report notes there is evidence of poorer health linked to sub-standard accommodation, fuel poverty, lack of central heating, etc., which would be addressed by increasing the newly built affordable housing stock (provided the case-by-case assessment of needs prioritises the needs of those in the worst homes currently).

4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough

√

√

√

This is clearly beneficial, assuming the poorest homes are in the most deprived areas, though other policies would be needed to tackle poverty and exclusion directly.

5 Improve educational achievement and develop opportunities to acquire new skills

~

~

~

6 Reduce crime and the fear of it

?

?

?

Not evident what relationship exists between deprivation and crime levels within the Borough, and the extent to which these could be reduced by providing better housing for this group.

|  |   |   |   |   |
|--|---|---|---|---|
| 7 Create and sustain vibrant, distinctive communities  | ? | ? | ? | Might be argued that improving accommodation addresses an issue of the vibrancy of the community.   |
| 8 Provide accessible essential services and facilities   | ~ | ~ | ~ |   |
| 9 Provide accessible culture and recreation facilities   | ~ | ~ | ~ |   |
| 10 Improve efficient land use, design, layout and reduce contamination                             | ~ | ~ | ~ | (Supporting guide states that this would be addressed on a case-by-case basis, and presumably also subject to Core Strategy policy on sustainable design and construction.) |
| 11 Reduce air pollution and improve air quality where possible                                     | ~ | ~ | ~ |   |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change         | ~ | ~ | ~ |   |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                  | ~ | ~ | ~ |   |
| 14 Protect and enhance the Borough's heritage and archaeological assets                            | ~ | ~ | ~ |   |
| 15 Improve travel choice, reducing car usage, traffic and congestion                               | ? | ? | ? | Not evident there is an impact as this issue is addressed mainly by policy on housing density rather than tenure.   |
| 16 Promote sustainable use of resources  | ~ | ~ | ~ |   |
| 17 Maintain and improve recycling and other waste minimisation measures                            | ~ | ~ | ~ |   |
| 18 Maintain and improve the quality of water resources   | ~ | ~ | ~ |   |
| 19 Conserve and improve soil resources   | ~ | ~ | ~ |   |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources | ~ | ~ | ~ |   |
| 21 Ensure high and stable employment levels, and sustain competitiveness                           | ~ | ~ | ~ |   |
| 22 Encourage smart economic growth   | ~ | ~ | ~ |   |
| 23 Develop and maintain a skilled workforce  | ~ | ~ | ~ |   |

**Summary of assessment:** Clearly a crucial and sustainable policy given the recognised shortages of affordable housing, recent growth in the gap between house prices and incomes, and the need to attract a range of skilled workers – including those in the ‘key’ category – to address current shortfalls. The criteria that define when contributions will be considered appear consistent with levels being set by other Councils, taking account of the need to secure further housing without setting levels so high that they become a disincentive to developers.

The policy is similar to the earlier SPG reviewed on the preceding pages, the most significant change being that it specifies a threshold level of provision (30%) that will be sought from all development. Whereas the SPG in particular justifies the change in the size threshold for seeking provision, this policy does not identify how the figure of 30% has been derived, although we note this appears to be consistent with the levels being sought by other councils with potentially severe shortages of this type of housing.

It is essential to recognise that the policy seeks decent affordable homes and that the right mix of housing (ie. in terms of bedroom size) is delivered to meet recognised needs. However the assessment assumes this is delivered by other LDF policies.

**Summary of mitigation proposals:** The Council could consider transferring key statements from the supporting Developers’ Guide into the text accompanying the policy. Key points are: [a] the intention to review type, tenure, design, etc., on a case by case basis; and [b] the priority attached to on-site provision (with contributions to off-site provision as a last resort). We understand the latter issue reflects a change in approach to that in the adopted Developer Contributions SPG, which results from the abolition of the Social Housing Grant. As such it is not reflected in adopted policy and could therefore be more explicit in the revised policy.

**Secondary, cumulative or synergistic effects:** The principal secondary and cumulative impacts are the effects of failing to address shortages in affordable housing. The number of deprived households would not necessarily increase but these residents’ needs would be met. Equally the Scoping Report acknowledges the existing shortage of homes for lower-paid skilled workers who are a vital part of the infrastructure supporting the local economy and community, and failing to provide homes for them would have a clear long-term detrimental effect, especially if there is further growth in homes and jobs in the Borough.

## 2(i) Transport – Workplace travel plans

Defines a range of criteria for new developments which define when the Council will require the developer and occupier to prepare, implement and monitor a travel plan designed to limit the transport-related impacts of the development and to increase the proportion of trips to/from the site by non-car modes.

### Sustainability Appraisal Objectives

[abridged in some cases]

- | Sustainability Appraisal Objectives   | Assessment |      |      | Comments / Proposed Mitigation |
|---|------------|------|------|--------------------------------|
|   | Short      | Med. | Long |                                |
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~          | ~    | ~    |                                |
| 2 Reduce the risk of flooding and its consequences  | ~          | ~    | ~    |                                |

|    |   |   |     |   |  |
|----|---|---|-----|---|--|
| 3  | Improve health and well-being, and reduce health inequalities                                     | ~ | (√) | √ | Potential outcome is more people walking or cycling to work – ie. healthier and sustainable transport. However the targets for car-use reduction (see Developers' Guide) suggest this may take time to materialise. The initial commuting level stated in the Guide assumes 70% will commute by car, though this is higher than current rates stated in the Scoping Report baseline. |
| 4  | Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ~ | ~   | ~ |  |
| 5  | Improve educational achievement and develop opportunities to acquire new skills                   | ~ | ~   | ~ |  |
| 6  | Reduce crime and the fear of it   | ~ | ~   | ~ |  |
| 7  | Create and sustain vibrant, distinctive communities   | ? | ?   | ? | Some potential benefit from reducing congestion, though the policy applies principally to new development only.  |
| 8  | Provide accessible essential services and facilities  | √ | √   | √ | Effect must be positive if the policy supports modal choice and applies to A-class and other developments, not just to B-class.  |
| 9  | Provide accessible culture and recreation facilities  | √ | √   | √ | As above.  |
| 10 | Improve efficient land use, design, layout and reduce contamination                               | ~ | ~   | ~ |  |
| 11 | Reduce air pollution and improve air quality where possible                                       | √ | √   | √ | Clear benefit as it seeks to reduce car usage, trip numbers and length. Benefit would be more positive and cumulative if the policy applies generally rather than to new development only (though this is addressed by policy 2(ii).   |
| 12 | Reduce emissions of greenhouse gases and vulnerability to the effects of climate change           | ~ | ~   | ~ | (Air quality implications as for objective 11).  |
| 13 | Conserve and enhance biodiversity, and protect designated habitats and species                    | ~ | ~   | ~ |  |



|   |   |   |   |
|---|---|---|---|
| 14 Protect and enhance the Borough's heritage and archaeological assets   | ~ | ~ | ~ |
| 15 Improve travel choice, reducing car usage, traffic and congestion  | √ | √ | √ |
| 16 Promote sustainable use of resources   | √ | √ | √ |
| 17 Maintain and improve recycling and other waste minimisation measures   | ~ | ~ | ~ |
| 18 Maintain and improve the quality of water resources  | ~ | ~ | ~ |
| 19 Conserve and improve soil resources  | ~ | ~ | ~ |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources  | ~ | ~ | ~ |
| 21 Ensure high and stable employment levels, and sustain competitiveness  | ~ | ~ | ~ |
| 22 Encourage smart economic growth  | √ | √ | √ |
| 23 Develop and maintain a skilled workforce   | ~ | ~ | ~ |
| <p><b>Summary of assessment: Clearly sustainable and consistent with national guidance in PPG13 in that it seeks to contain the transport impacts of new development. However the policy is focused on producing a Travel Plan and appears to exclude the possibility of seeking contributions – for example, for new public transport links to the site – which would help to contain traffic growth, and which would support several of the SA objectives.</b></p> <p><b>Summary of mitigation proposals: As above. There is a slight concern about the first item in the 'Proposal' section which implies a Plan is required for all new commercial buildings regardless of size and the outcome of any transport assessment which may have been undertaken. While we acknowledge that Travel Plans are a key component of delivering sustainable transport policy we suggest the should be a size-based criterion, recognising the financial costs (of preparing a Plan) implicit in the policy. Finally, policy 2(ii) makes more explicit the link to Transport Assessments and we propose this should be included in this policy too.</b></p> |   |   |   |

A clear objective of the policy, however it places the onus on the developer and occupier, and benefits will only materialise with coordinated improvements in public transport. The policy does not currently appear to address the possibility of seeking support - for example for new bus services - as a financial contribution.

Supportive in terms of its impact on fuel use.

(Energy/fuel issues as for objective 16.)

The basic approach is consistent with that adopted by other authorities seeking to control the impacts of new development. There is a slight concern about the wording of the "proposal" section of the policy insofar as the first bullet point implies a Plan will be required for all new buildings (see mitigation proposals below for expansion of this point).

**Secondary, cumulative or synergistic effects:** Depends on the number of schemes to which this policy applies, but there is a prospect of long-term traffic reduction though this is more likely to be delivered by policy 2(ii).

## 2(ii) Transport – Highways and public transport

Establishes the Council's intention to seek contributions to a variety of transport infrastructure improvements, which would be proportional to the increase in size of the development or to the projected increase in traffic. The policy is flexible insofar as it enables the Council to seek improvements in pedestrian and cycling infrastructure, not just road improvements.

### Sustainability Appraisal Objectives [abridged in some cases]

### Comments / Proposed Mitigation

### Assessment

Short Med. Long

|   |   |   |   |
|---|---|---|---|
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~ | ~ | ~ |
| 2 Reduce the risk of flooding and its consequences  | ~ | ~ | ~ |
| 3 Improve health and well-being, and reduce health inequalities                                     | ✓ | ✓ | ✓ |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ~ | ~ | ~ |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | ~ | ~ | ~ |
| 6 Reduce crime and the fear of it   | ~ | ~ | ~ |
| 7 Create and sustain vibrant, distinctive communities   | ~ | ~ | ~ |
| 8 Provide accessible essential services and facilities  | ✓ | ✓ | ✓ |
| 9 Provide accessible culture and recreation facilities  | ✓ | ✓ | ✓ |

Supportive in that it can provide infrastructure to encourage more walking and cycling. Growth over time depends on the likely number of expansion schemes and therefore its impact may be incremental. Contributions sought also support the objective as they may include better road signs and other safety improvements that support this objective.

Proposals could include expansion of retailing and other functions and therefore ensure road capacity of availability of other means of access (specifically public transport) is maintained and/or improved.

As above.

|  |     |     |     |  |
|--|-----|-----|-----|--|
| 10 Improve efficient land use, design, layout and reduce contamination   | ~   | ~   | ~   | ~  |
| 11 Reduce air pollution and improve air quality where possible   | √   | √   | √   | Supportive insofar as it may contribute to reduced car usage, particularly where the Council seeks contributions to improved public transport links. |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change   | ~   | ~   | ~   |  |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species  | ~   | ~   | ~   |  |
| 14 Protect and enhance the Borough's heritage and archaeological assets  | ~   | ~   | ~   |  |
| 15 Improve travel choice, reducing car usage, traffic and congestion   | √   | √   | √   | As for objective 15. Impact depends on each scheme and the nature of the contributions that are sought.  |
| 16 Promote sustainable use of resources  | ~   | ~   | ~   |  |
| 17 Maintain and improve recycling and other waste minimisation measures  | ~   | ~   | ~   |  |
| 18 Maintain and improve the quality of water resources   | ~   | ~   | ~   |  |
| 19 Conserve and improve soil resources   | ~   | ~   | ~   |  |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources   | (√) | (√) | (√) | As for objectives 11 and 15.   |
| 21 Ensure high and stable employment levels, and sustain competitiveness   | ~   | ~   | ~   |  |
| 22 Encourage smart economic growth   | ~   | ~   | ~   |  |
| 23 Develop and maintain a skilled workforce  | ~   | ~   | ~   |  |
| <b>Summary of assessment: Little to comment on as the policy maintains the established approach to seeking contributions for expansion of existing land uses. The accompanying Developers' Guide indicates that the Council has a methodology which will calibrate the impact of each development and the corresponding contribution objectively and consistently.</b> |     |     |     |  |
| <b>Summary of mitigation proposals: None identified.</b>   |     |     |     |  |
| <b>Secondary, cumulative or synergistic effects: None identified.</b>  |     |     |     |  |

### 3 Education

**Establishes the Council's intention to seek contributions towards expanded educational needs for all new development. The type of contribution is linked to size, and will be primarily financial for small development (such as infill housing) but could require the developer to provide land or new schools for major housing projects.**

#### Sustainability Appraisal Objectives [abridged in some cases]

|   | Assessment |      |      | Comments / Proposed Mitigation   |
|---|------------|------|------|--|
|   | Short      | Med. | Long |  |
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~          | ~    | ~    |  |
| 2 Reduce the risk of flooding and its consequences  | ~          | ~    | ~    |  |
| 3 Improve health and well-being, and reduce health inequalities                                     | ~          | ~    | ~    |  |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ~          | ~    | ~    | Not evident that this policy would have an impact on this objective.   |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | (√√)       | (√√) | (√√) | Does not specifically support this objective as the main aim is to ensure school capacity keeps pace with housing growth. The mark reflects the indirect long-term effect of failing to provide enough educational capacity. |
| 6 Reduce crime and the fear of it   | ~          | ~    | ~    |  |
| 7 Create and sustain vibrant, distinctive communities   | ~          | ~    | ~    |  |
| 8 Provide accessible essential services and facilities  | ~          | ~    | ~    |  |
| 9 Provide accessible culture and recreation facilities  | ~          | ~    | ~    |  |
| 10 Improve efficient land use, design, layout and reduce contamination                              | ~          | ~    | ~    |  |
| 11 Reduce air pollution and improve air quality where possible                                      | ~          | ~    | ~    |  |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change          | ?          | ?    | ?    | Detail in the Developers' Guide suggests that in most instances the additional pupils would go to schools near to new homes, though other policies (notably 2(i)) would address this issue.                                  |

|  |      |      |   |
|--|------|------|---|
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                  | ~    | ~    | ~   |
| 14 Protect and enhance the Borough's heritage and archaeological assets                            | ~    | ~    | ~   |
| 15 Improve travel choice, reducing car usage, traffic and congestion                               | ~    | ~    | ~   |
| 16 Promote sustainable use of resources  | ~    | ~    | ~   |
| 17 Maintain and improve recycling and other waste minimisation measures                            | ~    | ~    | ~   |
| 18 Maintain and improve the quality of water resources   | ~    | ~    | ~   |
| 19 Conserve and improve soil resources   | ~    | ~    | ~   |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources | ~    | ~    | ~   |
| 21 Ensure high and stable employment levels, and sustain competitiveness                           | ~    | ~    | ~   |
| 22 Encourage smart economic growth   | ~    | ~    | ~   |
| 23 Develop and maintain a skilled workforce  | √(√) | √(√) | √(√) Potential contribution in the longer term if it helps to improve educational achievement levels. |

**Summary of assessment: A further sustainable policy that is consistent with existing approaches, and which is based on a transparent system of determining the appropriate level of contribution using a national approved calculation method.**

**Summary of mitigation proposals: The Developers' Guide refers to the different catchment structure of Roman Catholic schools. As the Scoping Report comments that there is a 5% ethnic minority in the Borough, perhaps the policy might make it clear whether their needs are subsumed in the main structure, or also addressed differently.**

**Secondary, cumulative or synergistic effects: None identified, however see comments in this section for the assessment below.**

| <b>4 Community and youth facilities</b> |   | <b>Proposes a contribution of £400 per dwelling towards new facilities or the improvement of existing facilities for all new housing development irrespective of size, where it lies within 1.5kms of a nominated project.</b> |      |      | <b>Sustainability Appraisal Objectives [abridged in some cases]</b> |  |  | <b>Assessment</b> |  |  | <b>Comments / Proposed Mitigation</b> |
|---|---|--|------|------|---|--|--|-------------------|--|--|---------------------------------------|
|   |   | Short  | Med. | Long |   |  |  |                   |  |  |                                       |
| 1                                       | Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~  | ~    | ~    |   |  |  |                   |  |  |                                       |
| 2                                       | Reduce the risk of flooding and its consequences  | ~  | ~    | ~    |   |  |  |                   |  |  |                                       |
| 3                                       | Improve health and well-being, and reduce health inequalities                                     | √√   | √√   | √√   |   |  |  |                   |  | Depends on nature of contribution, but the Developers' Guide makes clear it includes provision of leisure, recreational (and presumably) sports facilities, as well as community health and social services infrastructure.  |                                       |
| 4                                       | Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | (√)  | (√)  | (√)  |   |  |  |                   |  | Although funded (perhaps partly) by new development, facilities will be available for use by everyone. However the most deprived areas of the Borough will only benefit if they lie 'within range' of one of the nominated projects. The Developers' Guide does not make clear the mechanism for defining this list and updating it. |                                       |
| 5                                       | Improve educational achievement and develop opportunities to acquire new skills                   | √  | √    | √    |   |  |  |                   |  | Potential benefit from informal educational/vocational activity in these facilities.   |                                       |
| 6                                       | Reduce crime and the fear of it   | √  | √    | √    |   |  |  |                   |  | It is generally accepted that lack of youth facilities has a direct link to actual and perceived crime levels and therefore this policy is supportive.   |                                       |
| 7                                       | Create and sustain vibrant, distinctive communities   | √√   | √√   | √√   |   |  |  |                   |  | Role in creating vibrant communities is moot, but the policy will help to maintain the stock (and supply) of these facilities, and in some cases to pay for their upkeep.  |                                       |
| 8                                       | Provide accessible essential services and facilities  | √√   | √√   | √√   |   |  |  |                   |  | As for objective 7. Many of the facilities which might be provided under this policy are essential to inclusive community life.  |                                       |
| 9                                       | Provide accessible culture and recreation facilities  | √√   | √√   | √√   |   |  |  |                   |  | As above.  |                                       |

|  |   |   |   |   |
|--|---|---|---|---|
| 10 Improve efficient land use, design, layout and reduce contamination                             | ~ | ~ | ~ | ~   |
| 11 Reduce air pollution and improve air quality where possible                                     | ~ | ~ | ~ | (Marked as neutral but implicitly supportive since the criteria link development and community facility by distance, implying access by non-car modes.) |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change         | ~ | ~ | ~ |   |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                  | ~ | ~ | ~ |   |
| 14 Protect and enhance the Borough's heritage and archaeological assets                            | ~ | ~ | ~ |   |
| 15 Improve travel choice, reducing car usage, traffic and congestion                               | ~ | ~ | ~ | As for objective 11.  |
| 16 Promote sustainable use of resources  | ~ | ~ | ~ |   |
| 17 Maintain and improve recycling and other waste minimisation measures                            | ~ | ~ | ~ |   |
| 18 Maintain and improve the quality of water resources   | ~ | ~ | ~ |   |
| 19 Conserve and improve soil resources   | ~ | ~ | ~ |   |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources | ~ | ~ | ~ |   |
| 21 Ensure high and stable employment levels, and sustain competitiveness                           | ~ | ~ | ~ |   |
| 22 Encourage smart economic growth   | ~ | ~ | ~ |   |
| 23 Develop and maintain a skilled workforce  | ~ | ~ | ~ |   |

**Summary of assessment:** Parallels policy 3 in seeking to fund necessary growth in social infrastructure which arises from housing growth. It has not been possible to validate the Council's chosen level of contribution. However there is a concern that the policy links the Council's right to seek contributions to proximity of the development to one of the nominated schemes. It is not clear how the Council identifies such schemes, how frequently it updates this list, and how the process might be utilised to provide improved facilities especially in the more deprived areas of the Borough. (However we recognise that this detail may be more appropriate to the Developers' Guide than the policy itself).

**Summary of mitigation proposals:** See above.

**Secondary, cumulative or synergistic effects:** There is a concern about the secondary impact of this obligation on the funding of affordable homes when it is taken together with policies 3 and 5. Although we would expect affordable development to provide more 1 and 2-bed homes, some properties would lie outside the exclusion criteria cited in para. 3.3.1 of the Developer's Guide, and this would require an additional contribution of around £2750 for each new dwelling. Contributions are justified to meet the cost of new infrastructure arising from development, however we must raise this as an issue for consideration as the additional cost might affect developers' incentives, and in the light of the Council's reliance on these contributions policies to meet its affordable housing targets. Also, the proximity criterion used for policies 4 and 5 suggest that provision will be focused on the larger settlements and this may affect provisioning of facilities in rural areas in the long term. This is much less of an issue for policy 5 since it takes account of mobile library services which automatically extend the 'proximity' zone, but we suggest it would be necessary for the Council to monitor the rate of rural housing provision which escapes policy 4 due to its distance from nominated projects to ensure that these areas do not fall have lower levels of improvements from this source than the urban areas of the Borough.

## 5 Library services

**Proposes a contribution of £900 towards expanded and/or improved library facilities which would apply to all new dwellings.**

### Sustainability Appraisal Objectives [abridged in some cases]

|   | Assessment |      |      | Comments / Proposed Mitigation   |
|---|------------|------|------|--|
|   | Short      | Med. | Long |  |
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~          | ~    | ~    |  |
| 2 Reduce the risk of flooding and its consequences  | ~          | ~    | ~    |  |
| 3 Improve health and well-being, and reduce health inequalities                                     | ~          | ~    | ~    |  |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ✓          | ✓    | ✓    | Supportive if it maintains the supply and quality of a core community facility.  |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | ✓          | ✓    | ✓    | Clear potential benefit, though impact on objective ultimately depends on library usage rates.   |
| 6 Reduce crime and the fear of it   | ~          | ~    | ~    |  |
| 7 Create and sustain vibrant, distinctive communities   | ~          | ~    | ~    |  |
| 8 Provide accessible essential services and facilities  | ✓          | ✓    | ✓    | The Scoping Report does not define the essential services, but even if libraries as excluded from this objective the same benefit accrues under objective 9. |
| 9 Provide accessible culture and recreation facilities  | ✓          | ✓    | ✓    | See above.   |



|  |     |     |   |
|--|-----|-----|---|
| 10 Improve efficient land use, design, layout and reduce contamination   | ~   | ~   | ~   |
| 11 Reduce air pollution and improve air quality where possible   | (√) | (√) | Supportive in principle especially if it helps to maintain rural mobile library services which may obviate the need for some trips. |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change   | ~   | ~   | ~   |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species  | ~   | ~   | ~   |
| 14 Protect and enhance the Borough's heritage and archaeological assets  | ~   | ~   | ~   |
| 15 Improve travel choice, reducing car usage, traffic and congestion   | ~   | ~   | (Relevant comment under objective 11.)  |
| 16 Promote sustainable use of resources  | ~   | ~   | ~   |
| 17 Maintain and improve recycling and other waste minimisation measures  | ~   | ~   | ~   |
| 18 Maintain and improve the quality of water resources   | ~   | ~   | ~   |
| 19 Conserve and improve soil resources   | ~   | ~   | ~   |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources   | ~   | ~   | ~   |
| 21 Ensure high and stable employment levels, and sustain competitiveness   | ~   | ~   | ~   |
| 22 Encourage smart economic growth   | ~   | ~   | ~   |
| 23 Develop and maintain a skilled workforce  | (√) | (√) | Depends on facilities provided and maintained, but can make an incremental contribution.  |
| <b>Summary of assessment: Parallels policies 3 and 4 in seeking to recover infrastructure costs proportionate to new development. Little else to comment on.</b>   |     |     |   |
| <b>Summary of mitigation proposals: The Developers' Guide notes the Council's intention to seek contributions from commercial developments which may result in more workers who live outside the Borough wanting to use library facilities within it. We must rely on the Council's advice that this is a particular issue for the Borough, however the current policy text mentions only contributions from new housing and makes no reference to commercial sources.</b> |     |     |   |
| <b>Secondary, cumulative or synergistic effects: See comments in this section for policy 4.</b>  |     |     |   |

| <b>6(i) Recreation &amp; Leisure – Indoor sports and public open space provision</b>   |   | <b>Assessment</b> |             |             | <b>Comments / Proposed Mitigation</b> |  |
|--|---|-------------------|-------------|-------------|---------------------------------------|--|
| <b>Seeks tiered contributions from new commercial development towards both forms of recreational facility depending on the type of land use.</b> |   | <b>Short</b>      | <b>Med.</b> | <b>Long</b> |                                       |  |
| <b>Sustainability Appraisal Objectives</b>   |   |                   |             |             |                                       |  |
| <b>[abridged in some cases]</b>  |   |                   |             |             |                                       |  |
| 1  | Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~                 | ~           | ~           |                                       |  |
| 2  | Reduce the risk of flooding and its consequences  | ~                 | ~           | ~           |                                       |  |
| 3  | Improve health and well-being, and reduce health inequalities                                     | √√                | √√          | √√          |                                       | Nature of improvements listed suggests lifestyle improvements from recreational facilities.  |
| 4  | Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ~                 | ~           | ~           |                                       |  |
| 5  | Improve educational achievement and develop opportunities to acquire new skills                   | ~                 | ~           | ~           |                                       |  |
| 6  | Reduce crime and the fear of it   | ~                 | ~           | ~           |                                       |  |
| 7  | Create and sustain vibrant, distinctive communities   | ?                 | ?           | ?           |                                       | Might be argued this follows from the improvements proposed.   |
| 8  | Provide accessible essential services and facilities  | ~                 | ~           | ~           |                                       |  |
| 9  | Provide accessible culture and recreation facilities  | √√                | √√          | √√          |                                       | Clearly the key objective of the policy, along with ensuring that local recreational 'capacity' keeps pace with growth in local population which is likely to result from new jobs (clearly this assumes most of the new workers live in the Borough). However it is not clear why development in categories A1 and A2 in particular have been excluded since a major retail site or new office for a financial services provider would be exempt according to the current conditions of the policy. |
| 10   | Improve efficient land use, design, layout and reduce contamination                               | ~                 | ~           | ~           |                                       |  |
| 11   | Reduce air pollution and improve air quality where possible                                       | ?                 | ?           | ?           |                                       | As the policy provides funding for public open space the marking might be positive for the reason given in policy assessment 6(iii). However the current list of projects is focused exclusively on leisure / sports facilities.   |

|  |     |     |     |  |
|--|-----|-----|-----|--|
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change         | ~   | ~   | ~   | ~  |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                  | ?   | ?   | ?   | As for objective 11.   |
| 14 Protect and enhance the Borough's heritage and archaeological assets                            | ~   | ~   | ~   | ~  |
| 15 Improve travel choice, reducing car usage, traffic and congestion                               | ~   | ~   | ~   | ~  |
| 16 Promote sustainable use of resources  | ~   | ~   | ~   | ~  |
| 17 Maintain and improve recycling and other waste minimisation measures                            | ~   | ~   | ~   | ~  |
| 18 Maintain and improve the quality of water resources   | ~   | ~   | ~   | ~  |
| 19 Conserve and improve soil resources   | ~   | ~   | ~   | ~  |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources | ~   | ~   | ~   | ~  |
| 21 Ensure high and stable employment levels, and sustain competitiveness                           | (√) | (√) | (√) | All but one of the costliest projects listed will add leisure facilities, creating new employment in small increments. |
| 22 Encourage smart economic growth   | ~   | ~   | ~   | ~  |
| 23 Develop and maintain a skilled workforce  | ~   | ~   | ~   | ~  |

**Summary of assessment:** Policy seeks funding from business development only and therefore implicitly assumes that most of the growth in jobs will be met from the locally resident workforce. There are obvious health and recreational benefits, with lesser and more indirect impacts from increased leisure sector employment. We note that at present the facilities sought are entirely for indoor leisure and there is no evidence of need for open space, even though the Scoping Report and Developers' Guide acknowledge there are shortages in some communities. It is not clear, but assumed, that the Council will attempt to address these shortfalls through policy 6(iii) which does not apply to business development.

**Summary of mitigation proposals:** The policy makes clear that tiered payments are derived from an adopted SPG and reflect the variation in employment density, and therefore the number of jobs, that would be expected from new development. However a major retail development, or new office for a financial services company both appear to be exempt from the current policy, which only applies to B-class land use. It is not evident why these classes are excluded as both could result in substantial employment growth (eg. it could be assumed employment densities for A2 and B1 are similar).

**Secondary, cumulative or synergistic effects:** Main impacts are secondary benefits from improved provision of recreational facilities for the broader community.

**6(ii) Recreation & Leisure – Public art**

**States intention to seek contributions from housing and commercial development to fund public art (or infrastructure for it) and other cultural and recreational facilities.**

**Sustainability Appraisal Objectives  
[abridged in some cases]**

**Comments / Proposed Mitigation**

**Assessment**

**Short Med. Long**

|   |     |     |     |     |   |
|---|-----|-----|-----|-----|---|
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ?   | ?   | ?   | ?   | The policy text appears to restrict contributions to centrally located housing – ie. within 500m of the town centre. Combined with other (potential) contributions, this could raise the cost of housing provision in central site where current planning policy is encouraging such development if suitable land is available. |
| 2 Reduce the risk of flooding and its consequences  | ~   | ~   | ~   | ~   |   |
| 3 Improve health and well-being, and reduce health inequalities                                     | ~   | ~   | ~   | ~   |   |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ?   | ?   | ?   | ?   | Does not address this objective directly. However the facilities funded this way benefit the whole community but would only be raised from central sites, and this suggests an inequality in the way this policy could be applied which appears difficult to justify.   |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | ~   | ~   | ~   | ~   |   |
| 6 Reduce crime and the fear of it   | ~   | ~   | ~   | ~   |   |
| 7 Create and sustain vibrant, distinctive communities   | √√  | √√  | √√  | √√  | Clearly benefits from the range of project that could be funded from this source.   |
| 8 Provide accessible essential services and facilities  | ~   | ~   | ~   | ~   |   |
| 9 Provide accessible culture and recreation facilities  | √√√ | √√√ | √√√ | √√√ | The primary objective of the policy. We note that the current list of projects makes relatively little reference to public art other than funding for exhibition facilities.  |
| 10 Improve efficient land use, design, layout and reduce contamination                              | ~   | ~   | ~   | ~   |   |
| 11 Reduce air pollution and improve air quality where possible                                      | ~   | ~   | ~   | ~   |   |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change          | ~   | ~   | ~   | ~   |   |

|  |   |   |   |   |
|--|---|---|---|---|
| 13 Conserve and enhance biodiversity, and protect designated habitats and species  | ~ | ~ | ~ |   |
| 14 Protect and enhance the Borough's heritage and archaeological assets  | √ | √ | √ | Current project list includes refurbishment of specific cultural heritage facilities.   |
| 15 Improve travel choice, reducing car usage, traffic and congestion   | ~ | ~ | ~ |   |
| 16 Promote sustainable use of resources  | ~ | ~ | ~ |   |
| 17 Maintain and improve recycling and other waste minimisation measures  | ~ | ~ | ~ |   |
| 18 Maintain and improve the quality of water resources   | ~ | ~ | ~ |   |
| 19 Conserve and improve soil resources   | ~ | ~ | ~ |   |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources   | ~ | ~ | ~ |   |
| 21 Ensure high and stable employment levels, and sustain competitiveness   | ? | ? | ? | Depends on nature of improvements, but there may be scope for small growth in employment if some of the projects are large enough (and also temporarily from, for example, refurbishment projects). |
| 22 Encourage smart economic growth   | ~ | ~ | ~ |   |
| 23 Develop and maintain a skilled workforce  | ~ | ~ | ~ |   |
| <b>Summary of assessment: Little to comment on as this policy also seeks contributions to facilities which benefit the broader community and which is consistent with PPG6. The only issue the assessment raises is the limited zone within which contributions will be sought. Facilities funded by it will benefit the whole community, but new development more than 500m from the town centre will be exempt. This appears to penalise central developments.</b> |   |   |   |   |
| <b>Summary of mitigation proposals: See above.</b>   |   |   |   |   |
| <b>Secondary, cumulative or synergistic effects: None identified.</b>  |   |   |   |   |

### 6(iii) Recreation & Leisure – Open space provision and residential development

Seeks provision of or contribution to public open space from all housing development.

Sustainability Appraisal Objectives

[abridged in some cases]

Assessment

Short

Med.

Long

Comments / Proposed Mitigation

|   |     |     |     |   |
|---|-----|-----|-----|---|
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~   | ~   | ~   | It is not evident that open space provision would affect housing provision since the policy reflects the Local Plan which in turn is consistent with PPG17.   |
| 2 Reduce the risk of flooding and its consequences  | ~   | ~   | ~   | A clear direct relationship (the mark might be understated).  |
| 3 Improve health and well-being, and reduce health inequalities                                     | ✓   | ✓   | ✓   | Nature of the policy suggests it is applied to all development and could therefore benefit those living in poorer quality homes in more deprived areas if they are relocated to new affordable homes in locations where open space is 'designed into' the area. Equally, although it is not evident from the policy text or the Developers' Guide, some contributions might address shortfalls in current provision, which might benefit more deprived areas. |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | (✓) | (✓) | (✓) |   |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | ~   | ~   | ~   |   |
| 6 Reduce crime and the fear of it   | ~   | ~   | ~   |   |
| 7 Create and sustain vibrant, distinctive communities   | ✓   | ✓   | ✓   | Supportive in principle. See also below.  |
| 8 Provide accessible essential services and facilities  | ~   | ~   | ~   |   |
| 9 Provide accessible culture and recreation facilities  | ✓   | ✓   | ✓   | The primary objective of this policy. The marking is qualified because the Developers' Guide acknowledges shortages of recreational space in some communities and it is not clear to what extent the policy can address this issue, or whether it will primarily ensure current standards are met for new housing.  |
| 10 Improve efficient land use, design, layout and reduce contamination                              | ?   | ?   | ?   | Layout improvement if open space breaks up the built environment attractively.  |
| 11 Reduce air pollution and improve air quality where possible                                      | (✓) | (✓) | (✓) | Open space provision provides for air circulation and therefore contributes to the objective indirectly.  |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change          | ~   | ~   | ~   |   |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                   | ✓   | ✓   | ✓   | Policy does not dictate the nature of the space provided but there are clear biodiversity benefits in attracting wildlife into suburban areas.  |
| 14 Protect and enhance the Borough's heritage and archaeological assets                             | ~   | ~   | ~   |   |

|  |   |   |   |   |  |
|--|---|---|---|---|--|
| 15   | Improve travel choice, reducing car usage, traffic and congestion                               | ? | ? | ? | Depends on location and current recreational activity, but ensuring facilities are located close to housing should encourage use and access on foot/cycle. |
| 16   | Promote sustainable use of resources  | ~ | ~ | ~ |  |
| 17   | Maintain and improve recycling and other waste minimisation measures                            | ~ | ~ | ~ |  |
| 18   | Maintain and improve the quality of water resources   | ? | ? | ? | As for objective 10, though in this case the space contributes to the absorption of rainwater.   |
| 19   | Conserve and improve soil resources   | ~ | ~ | ~ |  |
| 20   | Increase energy efficiency and the proportion of the energy needs supplied by renewable sources | ~ | ~ | ~ |  |
| 21   | Ensure high and stable employment levels, and sustain competitiveness                           | ~ | ~ | ~ |  |
| 22   | Encourage smart economic growth   | ~ | ~ | ~ |  |
| 23   | Develop and maintain a skilled workforce  | ~ | ~ | ~ |  |
| <b>Summary of assessment:</b> Policy has several direct and indirect benefits and is clearly a reflection of adopted Local policy and current planning policy (PPG17). The level of contribution is proportional to the size of the development, and the fragmented nature of contributions from small scale development is handled by seeking funding for off-site development within the vicinity. It is assumed that for smaller developments contributions will be financial rather than land. The indirect benefits are more numerous, including improvement of the public realm, biodiversity improvements, and even allowing space for rainwater to recharge the water table. |   |   |   |   |  |
| <b>Summary of mitigation proposals:</b> None identified.   |   |   |   |   |  |
| <b>Secondary, cumulative or synergistic effects:</b> The indirect effects mentioned above may be considered secondary (positive) benefits of the policy.   |   |   |   |   |  |

## 7 Town Management & Improvement

States the Council's intention to seek contributions towards the cost of town centre enhancements and infrastructure projects from development within the same town and within 500m of its defined central area. The policy also provides for additional contributions from developments outside this zone in exceptional cases.

Sustainability Appraisal Objectives  
[abridged in some cases]

Comments / Proposed Mitigation

|            |      |
|------------|------|
| Assessment |      |
| Short      | Long |
| Med.       |      |

|   |    |    |    |    |  |
|---|----|----|----|----|--|
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~  | ~  | ~  | ~  | Policy text appears to exclude contribution from housing.  |
| 2 Reduce the risk of flooding and its consequences  | ~  | ~  | ~  | ~  | (Although the current list of projects include a small number related to safety in town centres).  |
| 3 Improve health and well-being, and reduce health inequalities                                     | ~  | ~  | ~  | ~  |  |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ~  | ~  | ~  | ~  |  |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | ~  | ~  | ~  | ~  |  |
| 6 Reduce crime and the fear of it   | ?  | ?  | ?  | ?  | (List of projects includes a camera and is assumed to be indicative of the type of facilities that could be funded.)   |
| 7 Create and sustain vibrant, distinctive communities   | √√ | √√ | √√ | √√ | The policy text only suggests that this is one of the primary objectives of the policy, but this is more evident from the list of projects which include a substantial programme for improving the public realm. |
| 8 Provide accessible essential services and facilities  | ~  | ~  | ~  | ~  |  |
| 9 Provide accessible culture and recreation facilities  | √  | √  | √  | √  | Several leisure improvements included in project list.   |
| 10 Improve efficient land use, design, layout and reduce contamination                              | √  | √  | √  | √  |  |
| 11 Reduce air pollution and improve air quality where possible                                      | ~  | ~  | ~  | ~  | (Addressed through other policy.)  |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change          | ~  | ~  | ~  | ~  |  |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                   | ?  | ?  | ?  | ?  | Not strictly addressed. Small-scale improvements are included in the project list, but this objective is assumed to require more substantial improvements than those currently listed.                           |
| 14 Protect and enhance the Borough's heritage and archaeological assets                             | √  | √  | √  | √  | As with objective 7, the policy intention is not evident in the text but the list of projects illustrates examples (such as conservation area improvements) which suggests the objective would be supported.     |
| 15 Improve travel choice, reducing car usage, traffic and congestion                                | ?  | ?  | ?  | ?  | Not addressed directly, but several projects appear to contribute to a better quality and safer pedestrian environment, which may support this objective indirectly.   |



|  |   |   |   |  |
|--|---|---|---|--|
| 16 Promote sustainable use of resources  | ~ | ~ | ~ | ~  |
| 17 Maintain and improve recycling and other waste minimisation measures                            | ? | ? | ? | Not mentioned, even in the list of projects. Are there small-scale improvements that could be delivered by this route?   |
| 18 Maintain and improve the quality of water resources   | ~ | ~ | ~ | ~  |
| 19 Conserve and improve soil resources   | ~ | ~ | ~ | ~  |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources | ~ | ~ | ~ | ~  |
| 21 Ensure high and stable employment levels, and sustain competitiveness                           | ~ | ~ | ~ | ~  |
| 22 Encourage smart economic growth   | ? | ? | ? | The objective is not directly tackled by this policy, nevertheless maintaining and improving town centres contributes to their vitality and attraction, sustaining the retail sector in particular, and many of the listed projects appear to have this purpose. |
| 23 Develop and maintain a skilled workforce  | ~ | ~ | ~ | ~  |

**Summary of assessment: A broadly sustainable policy which seeks funding for mainly small-scale environmental improvements to maintain the quality of the Borough's two main retail centres. The policy potentially supports a broad range of the objectives although this is only evident from scrutinising the list of current projects, and by making the assumption this is representative of how the policy would be used. Note that the current policy text does not detail how the level of contribution would be calculated.**

**Summary of mitigation proposals: Could the Borough's waste reduction strategy be supported from this source – for example more or improved waste bins, or a contribution to waste awareness campaigns, especially given the level of municipal wastes that are generated in town centres. (Note also that the text defining the contribution sought links it to 'additional dwellings' although the list of developments excludes housing and therefore a reference to floorspace only is appropriate.)**

**Secondary, cumulative or synergistic effects: Incremental long-term improvement in the public realm which will benefit the broader community while also indirectly helping to maintain the attractiveness of Maidenhead and Windsor as retail and service centres (with other knock-on benefits to jobs, cultural activities, tourism, etc.).**

## 8 Landscaping & Biodiversity

**Defines the intention to seek contributions to biodiversity improvements (assumed to include habitat improvement or creation) and landscaping measures where these cannot be secured through planning conditions.**

| Sustainability Appraisal Objectives<br>[abridged in some cases]                                     | Assessment |      |      | Comments / Proposed Mitigation   |
|---|------------|------|------|--|
|   | Short      | Med. | Long |  |
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~          | ~    | ~    |  |
| 2 Reduce the risk of flooding and its consequences  | ~          | ~    | ~    |  |
| 3 Improve health and well-being, and reduce health inequalities                                     | ~          | ~    | ~    |  |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ~          | ~    | ~    |  |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | ~          | ~    | ~    |  |
| 6 Reduce crime and the fear of it   | ~          | ~    | ~    |  |
| 7 Create and sustain vibrant, distinctive communities   | (√)        | (√)  | (√)  | Potential benefit of good landscaping and rural environment.   |
| 8 Provide accessible essential services and facilities  | ~          | ~    | ~    |  |
| 9 Provide accessible culture and recreation facilities  | ~          | ~    | ~    | (As biodiversity and recreation are not always good neighbours the assessment is assumed to be neutral.) |
| 10 Improve efficient land use, design, layout and reduce contamination                              | √          | √    | √    | Contributes to good urban (and rural?) design.   |
| 11 Reduce air pollution and improve air quality where possible                                      | ~          | ~    | ~    |  |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change          | ~          | ~    | ~    |  |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                   | √√√        | √√√  | √√√  | The primary objective of the policy.   |
| 14 Protect and enhance the Borough's heritage and archaeological assets                             | ~          | ~    | ~    |  |

|   |   |   |   |  |
|---|---|---|---|--|
| 15  | Improve travel choice, reducing car usage, traffic and congestion                               | ~ | ~ | ~  |
| 16  | Promote sustainable use of resources  | ~ | ~ | ~  |
| 17  | Maintain and improve recycling and other waste minimisation measures                            | ~ | ~ | ~  |
| 18  | Maintain and improve the quality of water resources   | ~ | ~ | ~  |
| 19  | Conserve and improve soil resources   | ? | ? | ?<br>Depends on specific circumstances but could be supportive indirectly. |
| 20  | Increase energy efficiency and the proportion of the energy needs supplied by renewable sources | ~ | ~ | ~  |
| 21  | Ensure high and stable employment levels, and sustain competitiveness                           | ~ | ~ | ~  |
| 22  | Encourage smart economic growth   | ~ | ~ | ~  |
| 23  | Develop and maintain a skilled workforce  | ~ | ~ | ~  |
| <b>Summary of assessment: One of many policies in the SPD which addresses areas where contributions / obligations are sought in mitigation of development impacts. As with several of the policies that follow, it mainly acts as a safety net in case funding or physical measures cannot be secured through planning obligations. It is not clear in what circumstances this would occur, though this does not detract from the sustainability of the policy.</b> |   |   |   |  |
| <b>Summary of mitigation proposals: None identified.</b>  |   |   |   |  |
| <b>Secondary, cumulative or synergistic effects: None assumed as the policy would be applied on a case-by-case basis and is therefore assumed to make small-scale, incremental improvements.</b>  |   |   |   |  |

## 9 Air Quality

Defines the Council's intention to seek additional contributions to fund air quality improvement measures, including funding the costs of monitoring programmes, from housing and other forms of commercial development.

### Sustainability Appraisal Objectives [abridged in some cases]

### Comments / Proposed Mitigation

### Assessment

Short Med. Long

|   |   |   |   |   |
|---|---|---|---|---|
| 1 | Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~ | ~ | ~   |
| 2 | Reduce the risk of flooding and its consequences  | ~ | ~ | ~   |
| 3 | Improve health and well-being, and reduce health inequalities                                     | √ | √ | √<br>Clear link between air quality and aspects of public health. |

|   |     |     |     |     |   |
|---|-----|-----|-----|-----|---|
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ~   | ~   | ~   | ~   | The Scoping Report does not indicate that areas of deprivation and poorer equality are co-located so there is assumed to be no impact.  |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | ~   | ~   | ~   | ~   |   |
| 6 Reduce crime and the fear of it   | ~   | ~   | ~   | ~   |   |
| 7 Create and sustain vibrant, distinctive communities   | ~   | ~   | ~   | ~   |   |
| 8 Provide accessible essential services and facilities  | ~   | ~   | ~   | ~   |   |
| 9 Provide accessible culture and recreation facilities  | ~   | ~   | ~   | ~   |   |
| 10 Improve efficient land use, design, layout and reduce contamination                              | √   | √   | √   | √   | Supportive, although strictly this is more relevant to objective 11.  |
| 11 Reduce air pollution and improve air quality where possible                                      | √√√ | √√√ | √√√ | √√√ | Clearly the principal impact of the policy, although it is difficult to identify what the sums raised by the policy could be used for to meet this objective other than to establish a monitoring facility. This raises the issue of whether the Council's right to seek contributions needs to be linked to the type of development and the likelihood it would generate or add to air quality problems. It raises a further issue of whether the Council has a right to ask for contributions to measures which would address air quality problems that arise from other sources.<br>Subsumed by comments for objective 11. |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change          | √√  | √√  | √√  | √√  |   |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                   | ?   | ?   | ?   | ?   | Potential indirect benefit?   |
| 14 Protect and enhance the Borough's heritage and archaeological assets                             | ~   | ~   | ~   | ~   |   |
| 15 Improve travel choice, reducing car usage, traffic and congestion                                | ?   | ?   | ?   | ?   | Depends on whether the contributions would be used to fund or promote sustainable transport schemes which could reduce traffic, and this raises the same issues identified for objective 11.  |
| 16 Promote sustainable use of resources   | ~   | ~   | ~   | ~   |   |
| 17 Maintain and improve recycling and other waste minimisation measures                             | ~   | ~   | ~   | ~   |   |
| 18 Maintain and improve the quality of water resources  | ~   | ~   | ~   | ~   |   |

|  |   |   |   |
|--|---|---|---|
| 19 Conserve and improve soil resources   | ~ | ~ | ~ |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources | ~ | ~ | ~ |
| 21 Ensure high and stable employment levels, and sustain competitiveness                           | ~ | ~ | ~ |
| 22 Encourage smart economic growth   | ~ | ~ | ~ |
| 23 Develop and maintain a skilled workforce  | ~ | ~ | ~ |

**Summary of assessment:** Clearly sustainable in principle, however it is difficult to judge how the policy might be used. We would expect the EIA process to ensure there is appropriate monitoring and mitigation of air quality problems arising from a development. Apart from funding the ongoing monitoring of its impact (which could be enforced by the EIA / planning obligation process) it is difficult to see how this policy would be applied in practical terms. The policy itself raises an issue about the Council's right to seek contributions when the development itself is the source of the problem. The Developers' Guide makes clearer the underlying motive, namely the need to achieve the objectives of the AQMA within the Borough, and makes clearer the possible justification for seeking these additional contributions.

**Summary of mitigation proposals:** None identified, though see above.

**Secondary, cumulative or synergistic effects:** Not clear what potential exists for longer term cumulative benefit exists, as we would expect this to derive from controls imposed through the EIA and planning obligation process, or through sustainable transport policy.

## 10 Waste Disposal

Establishes the intention to seek contributions towards the costs of waste collection and treatment arising from new development. Incremental contributions would be sought for limited amounts of new housing, whereas the Council may seek contributions in the form of finance, land and/or recycling facilities for larger housing developments and medium/ large commercial developments.

### Sustainability Appraisal Objectives [abridged in some cases]

#### Comments / Proposed Mitigation

#### Assessment

#### Short Med. Long

|   |     |     |     |   |
|---|-----|-----|-----|---|
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | (√) | (√) | (√) | Supportive insofar as it promotes provision of convenient, local facilities for waste collection. |
| 2 Reduce the risk of flooding and its consequences  | ~   | ~   | ~   |   |
| 3 Improve health and well-being, and reduce health inequalities                                     | ~   | ~   | ~   | Tenuous link between waste collection and health?   |

|   |     |      |     |  |
|---|-----|------|-----|--|
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ~   | ~    | ~   | ~  |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | ~   | ~    | ~   | ~  |
| 6 Reduce crime and the fear of it   | ~   | ~    | ~   | ~  |
| 7 Create and sustain vibrant, distinctive communities   | ~   | ~    | ~   | ~  |
| 8 Provide accessible essential services and facilities  | √   | √    | √   | Supportive – more so for large developments where the nature of contributions sought suggests facilities would be provide within or adjacent to new development, and this is likely to improve their accessibility (and their use, ideally). |
| 9 Provide accessible culture and recreation facilities  | ~   | ~    | ~   | ~  |
| 10 Improve efficient land use, design, layout and reduce contamination                              | ~   | ~    | ~   | (Assessment assumes contamination issues are addressed by other objective below.)  |
| 11 Reduce air pollution and improve air quality where possible                                      | ~   | ?    | (√) | Very indirect benefit from reduced landfill in the long term?  |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change          | ~   | ~    | ~   | ~  |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                   | ~   | ?    | (√) | As for objective 11.   |
| 14 Protect and enhance the Borough's heritage and archaeological assets                             | ~   | ~    | ~   | ~  |
| 15 Improve travel choice, reducing car usage, traffic and congestion                                | ~   | ~    | ~   | Assessment marked as neutral but has potential to deliver limited benefit if it makes collection of wastes more efficient, reducing waste contractors' vehicle movements.  |
| 16 Promote sustainable use of resources   | √   | √(√) | √√  | Supportive in principle if it increases recycling (re-use is better).  |
| 17 Maintain and improve recycling and other waste minimisation measures                             | √√√ | √√√  | √√√ | The principal objective of this policy.  |
| 18 Maintain and improve the quality of water resources  | ~   | ~    | ~   | ~  |
| 19 Conserve and improve soil resources  | ~   | ?    | (√) | As for objective 11.   |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources  | ~   | ~    | ~   | ~  |

|  |     |     |     |  |
|--|-----|-----|-----|--|
| 21 Ensure high and stable employment levels, and sustain competitiveness | ~   | ~   | ~   | ~  |
| 22 Encourage smart economic growth                                       | (√) | (√) | (√) | Ensures implications of growth for waste are not overlooked. |
| 23 Develop and maintain a skilled workforce                              | ~   | ~   | ~   |  |

**Summary of assessment:** Clearly a sustainable policy that is consistent with the current Waste Strategy (2000) and the proposals in PPS10. However the table of proposed contributions raises one point which is discussed below.

**Summary of mitigation proposals:** It is not clear why the policy sets a size threshold for commercial developments, but seeks a contribution from all levels of housing development. Major commercial development obviously provides a potential site for new waste handling facilities and clearly this cannot be overlooked. However the Council has no overarching obligation to collect commercial wastes. We would expect larger companies (possibly those who would occupy medium and large sites specified in the policy) would have centrally-negotiated waste management contracts and it appears difficult to justify seeking an additional financial contribution in these cases. In contrast we would expect smaller companies – ie. those falling below the threshold in the policy – to be those who are more likely to make use of WCA-operated collection facilities and therefore it appears more appropriate to seek contributions from these companies. For larger commercial developments, the Council might instead seek contributions where the developer or occupier has not produced a waste management strategy, since this would encourage greater use of these plans and would maintain the onus on businesses to manage the sustainable disposal of their wastes.

**Secondary, cumulative or synergistic effects:** Ideally the policy will contribute to meeting the costs that will be incurred in expanding the District (and county) waste treatment infrastructure, which will be necessary to meet recycling and value recovery targets.

## 11 Archaeology

Establishes the intention to seek proportionate contributions for archaeological assessments, surveys, recording and/or monitoring necessitated by new development.

### Sustainability Appraisal Objectives [abridged in some cases]

#### Comments / Proposed Mitigation

#### Assessment

#### Short Med. Long

- |   |   |   |   |
|---|---|---|---|
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~ | ~ | ~ |
| 2 Reduce the risk of flooding and its consequences  | ~ | ~ | ~ |
| 3 Improve health and well-being, and reduce health inequalities                                     | ~ | ~ | ~ |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ~ | ~ | ~ |

|    |   |     |     |     |                                       |
|----|---|-----|-----|-----|---------------------------------------|
| 5  | Improve educational achievement and develop opportunities to acquire new skills                 | ~   | ~   | ~   | ~                                     |
| 6  | Reduce crime and the fear of it   | ~   | ~   | ~   | ~                                     |
| 7  | Create and sustain vibrant, distinctive communities   | ~   | ~   | ~   | ~                                     |
| 8  | Provide accessible essential services and facilities  | ~   | ~   | ~   | ~                                     |
| 9  | Provide accessible culture and recreation facilities  | ~   | ~   | ~   | ~                                     |
| 10 | Improve efficient land use, design, layout and reduce contamination                             | ~   | ~   | ~   | ~                                     |
| 11 | Reduce air pollution and improve air quality where possible                                     | ~   | ~   | ~   | ~                                     |
| 12 | Reduce emissions of greenhouse gases and vulnerability to the effects of climate change         | ~   | ~   | ~   | ~                                     |
| 13 | Conserve and enhance biodiversity, and protect designated habitats and species                  | ~   | ~   | ~   | ~                                     |
| 14 | Protect and enhance the Borough's heritage and archaeological assets                            | √√√ | √√√ | √√√ | The primary objective of this policy. |
| 15 | Improve travel choice, reducing car usage, traffic and congestion                               | ~   | ~   | ~   | ~                                     |
| 16 | Promote sustainable use of resources  | ~   | ~   | ~   | ~                                     |
| 17 | Maintain and improve recycling and other waste minimisation measures                            | ~   | ~   | ~   | ~                                     |
| 18 | Maintain and improve the quality of water resources   | ~   | ~   | ~   | ~                                     |
| 19 | Conserve and improve soil resources   | ~   | ~   | ~   | ~                                     |
| 20 | Increase energy efficiency and the proportion of the energy needs supplied by renewable sources | ~   | ~   | ~   | ~                                     |
| 21 | Ensure high and stable employment levels, and sustain competitiveness                           | ~   | ~   | ~   | ~                                     |
| 22 | Encourage smart economic growth   | ~   | ~   | ~   | ~                                     |
| 23 | Develop and maintain a skilled workforce  | ~   | ~   | ~   | ~                                     |



**Summary of assessment:** There is very little to assess as the policy deals with a specific requirement. The main issue is whether the policy is necessary. We would expect the need for archaeological assessment to be defined during the scoping stage of the EIA of a new development, and this would place the burden to undertake the task and bear the costs on the developer. In the circumstances it is not clear under what conditions this policy would be used.

**Summary of mitigation proposals:** None identified.

**Secondary, cumulative or synergistic effects:** None identified.

## 12 Flood Risk Management & Drainage

Provides a 'safety net' enabling the Council to seek contributions to flood defence and drainage projects where these cannot be secured through planning conditions.

Sustainability Appraisal Objectives  
[abridged in some cases]

Comments / Proposed Mitigation

Assessment  
Short Med. Long

|   |     |     |     |
|---|-----|-----|-----|
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ~   | ~   | ~   |
| 2 Reduce the risk of flooding and its consequences  | √√√ | √√√ | √√√ |
| 3 Improve health and well-being, and reduce health inequalities                                     | ~   | ~   | ~   |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | ~   | ~   | ~   |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | ~   | ~   | ~   |
| 6 Reduce crime and the fear of it   | ~   | ~   | ~   |
| 7 Create and sustain vibrant, distinctive communities   | ~   | ~   | ~   |
| 8 Provide accessible essential services and facilities  | ~   | ~   | ~   |
| 9 Provide accessible culture and recreation facilities  | ~   | ~   | ~   |

Clearly the primary objective of the policy, although we would expect the Council to planning conditions based on provisions of PPG25 to require developers to fund flood protection and other measures necessitated by individual developments.

|  |     |     |     |  |
|--|-----|-----|-----|--|
| 10 Improve efficient land use, design, layout and reduce contamination                             | ~   | ~   | ~   | ~  |
| 11 Reduce air pollution and improve air quality where possible                                     | ~   | ~   | ~   | ~  |
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change         | ~   | ~   | ~   | ~  |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species                  | ~   | ~   | ~   | ~  |
| 14 Protect and enhance the Borough's heritage and archaeological assets                            | (√) | (√) | (√) | Potentially beneficial within the floodplain (eg. riverside Eton and Windsor). |
| 15 Improve travel choice, reducing car usage, traffic and congestion                               | ~   | ~   | ~   | ~  |
| 16 Promote sustainable use of resources  | ~   | ~   | ~   | ~  |
| 17 Maintain and improve recycling and other waste minimisation measures                            | ~   | ~   | ~   | ~  |
| 18 Maintain and improve the quality of water resources   | √   | √   | √   | Assumed to be delivered through drainage improvements.                         |
| 19 Conserve and improve soil resources   | ~   | ~   | ~   | ~  |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources | ~   | ~   | ~   | ~  |
| 21 Ensure high and stable employment levels, and sustain competitiveness                           | ~   | ~   | ~   | ~  |
| 22 Encourage smart economic growth   | ~   | ~   | ~   | ~  |
| 23 Develop and maintain a skilled workforce  | ~   | ~   | ~   | ~  |

**Summary of assessment:** A policy with focused but important implications for certain objectives. We would expect the principal costs of flood and drainage works to be recovered through planning obligations, based on the provisions of PPG25 which prevents new development in the floodplain without adequate protective measures. In some circumstances other developments may be necessary to afford broader protection to the community and which cannot be funded from private development, and we assume this policy is designed to seek contributions in these situations. The issue it raises is one of proximity. We assume flood risk is mainly though not exclusively along the Thames and tributaries, and it is not clear whether the Council could seek contributions from developments some distance from the river (eg. in the south-west corner of the borough). This issue is raised to prompt comment but it may not be necessary to address it in the SPD.

**Summary of mitigation proposals:** None identified.

**Secondary, cumulative or synergistic effects:** None identified.

### 13 Parish Projects

**Establishes the Council's intention to seek contributions from all forms of development as a supplementary source of funding for a range of improvements in individual parishes. These range from footpath resurfacing to construction of a new footbridge over the Thames at Cookham.**

#### Sustainability Appraisal Objectives

#### Comments / Proposed Mitigation

| [abridged in some cases]  | Assessment |      |     | Long |
|---|------------|------|-----|------|
|   | Short      | Med. | ?   |      |
| 1 Ensure everyone has the opportunity to live in a decent, sustainably constructed, affordable home | ?          | ?    | ?   | ?    |
| 2 Reduce the risk of flooding and its consequences  | ~          | ~    | ~   | ~    |
| 3 Improve health and well-being, and reduce health inequalities                                     | √          | √    | √   | √    |
| 4 Reduce poverty, exclusion and the gap between the most deprived areas and the rest of the Borough | (√)        | (√)  | (√) | (√)  |
| 5 Improve educational achievement and develop opportunities to acquire new skills                   | ~          | ~    | ~   | ~    |
| 6 Reduce crime and the fear of it   | √          | √    | √   | √    |
| 7 Create and sustain vibrant, distinctive communities   | √          | √    | √   | √    |
| 8 Provide accessible essential services and facilities  | ?          | ?    | ?   | ?    |
| 9 Provide accessible culture and recreation facilities  | √          | √    | √   | √    |
| 10 Improve efficient land use, design, layout, d reduce contamination                               | ~          | ~    | ~   | ~    |
| 11 Reduce air pollution and improve air quality where possible                                      | ~          | ~    | ~   | ~    |

Main concern is the impact of seeking further contributions on the economics of new housing development, and the effect this has on the viability of new affordable housing. A large proportion the listed projects offer community, social, recreational and other improvements. Since contributions must be sought that are appropriate to the source development these projects would be more likely to be funded by housing.

Depends on nature of improvements although several parishes have recreational projects.

The objective appears focused on reducing deprivation. It does contribute to reducing disparities in infrastructure availability between different parts of the Borough although the nature of the projects listed suggests it does not address key deprivation issues (some of which would be addressed by other contribution policies, notably 1, 3 and 4).

Several projects are for CCTV facilities suggesting the policy can support this objective.

Some projects more supportive than others but generally positive.

Objective is more concerned with transport and accessibility, although projects include localised traffic improvements.

Several facilities included in project list.

|  |     |     |     |
|--|-----|-----|-----|
| 12 Reduce emissions of greenhouse gases and vulnerability to the effects of climate change   | ~   | ~   | ~   |
| 13 Conserve and enhance biodiversity, and protect designated habitats and species  | (√) | (√) | (√) |
| 14 Protect and enhance the Borough's heritage and archaeological assets  | ?   | ?   | ?   |
| 15 Improve travel choice, reducing car usage, traffic and congestion   | (√) | (√) | (√) |
| 16 Promote sustainable use of resources  | ~   | ~   | ~   |
| 17 Maintain and improve recycling and other waste minimisation measures  | ?   | ?   | ?   |
| 18 Maintain and improve the quality of water resources   | ~   | ~   | ~   |
| 19 Conserve and improve soil resources   | ~   | ~   | ~   |
| 20 Increase energy efficiency and the proportion of the energy needs supplied by renewable sources   | ~   | ~   | ~   |
| 21 Ensure high and stable employment levels, and sustain competitiveness   | ~   | ~   | ~   |
| 22 Encourage smart economic growth   | ~   | ~   | ~   |
| 23 Develop and maintain a skilled workforce  | ~   | ~   | ~   |
| <b>Summary of assessment: A straightforward policy which seeks infrastructure improvements ranging in size from small maintenance work to new structures. The policy appears to provide a mechanism for funding projects which cannot be funded from other sources. In this respect it is not clear why it includes a substantial number of traffic improvement projects which are not specified in the project lists accompanying Policy 2 (although these projects are derived from requirements identified in the LTP, Cycle Strategy, etc.).</b> |     |     |     |
| <b>Summary of mitigation proposals: None identified.</b>   |     |     |     |
| <b>Secondary, cumulative or synergistic effects: As with other policies, the main concern is the cumulative impact of requiring further monies from developers. Contributions must be appropriate in type and scale to the development. As many of the projects listed for this type of contribution are for community and recreational facilities, it appears more likely these are appropriate to contributions from housing development.</b>  |     |     |     |