

# Sustainability Appraisal of the Borough Local Plan 2013 - 2033

## Non-technical Summary

Royal Borough of Windsor and Maidenhead

## Regulation 19 Report

May 2017



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# Non-technical Summary

## What is Sustainability Appraisal?

Lepus Consulting is conducting an appraisal process for the Royal Borough of Windsor and Maidenhead (RBWM) to help them write their Local Plan. The process is known as sustainability appraisal (SA). The appraisal includes the requirement to prepare an environmental assessment as part of the Strategic Environmental Assessment (SEA) Directive. The current version of the Local Plan is called the '**Borough Local Plan 2013 - 2033; Submission Version 2017**'. .

SA is the process of informing and influencing the preparation of the Local Plan to optimise the sustainability performance of the plan.

This document is a non technical summary of the full SA report. It includes the requirements of an environmental report in accordance with the SEA Directive.

## Purpose and content of the Sustainability Appraisal report

The purpose of this SA Report is to:

- Identify, describe and evaluate the likely significant effects of the Local Plan and its reasonable alternatives;
- Inform the development of the Borough Local Plan; and
- Provide an opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SA process which has been carried out to date.

The SA Report contains:

- An outline of the contents and main objectives of the Local Plan and its relationship with other relevant plans, programmes and strategies;
- Relevant aspects of the current state of the environment and key sustainability issues for the borough;
- The SA Framework of objectives and indicators against which the Local Plan has been assessed;
- The appraisal of reasonable alternatives identified during the plan making process to date, including an explanation about how they were identified, and either rejected and selected;
- The likely significant effects of the Local Plan in terms of sustainability;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects which may arise as a result of the Local Plan; and
- A description of the measures envisaged concerning monitoring.

## The scoping stage

The first phase of preparation for the SA was the scoping stage. Scoping is the process of deciding the scope and level of detail of an SA process, including the environmental effects and alternatives to be considered, the assessment methods to be used, and the structure and contents of the SA Report.

The purpose of the Scoping Report is to set the criteria for assessment (including the SA Objectives) and establish the baseline data and other information, including a review of relevant policies, programmes and plans. The Scoping Report that accompanies this SA report was prepared and consulted upon by Lepus Consulting in 2016<sup>1</sup>.

## Reasonable alternatives: Preferred Options Assessment (2014)

Between Friday 10 January and Friday 21 March 2014 RBWM undertook a consultation on the 'Borough Local Plan Preferred Options Consultation document.

This was accompanied by a Sustainability Appraisal and a Habitat Regulations Assessment Screening Report. The scope of assessment included three strategic development options as well as various reasonable alternatives which included policies and sites. The three strategic options were as follows:

- Option 1: To restrict building to the capacity of existing built up areas, avoiding building in the Green Belt.
- Option 2: To permit sufficient building to meet the projected population growth and economic needs, recognising that this would require some building in the Green Belt.
- Option 3: To permit building to a level that strikes a balance between meeting the projected population growth and economic need and the environmental impacts, including allowing some building in the Green Belt.

The assessment findings concluded that Strategic Option 3 should be taken forward as the plan's chosen strategic development policy direction. Potential Green Belt sites were therefore identified in the Edge of Settlement Analysis (2014) and assessed by the SA process.

Assessment during the Preferred Options stage (2014) helped inform the Local Plan's development in 2016, during which reasonable alternatives were again assessed, in light of the Plan's expanded requirement for new homes.

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<sup>1</sup> Lepus Consulting (2016) Strategic Environmental Assessment of the RBWM Local Plan: Scoping Report

## Reasonable alternatives: Draft Borough Local Plan (2016)

After 2014, Option 3 (as presented in the 2014 SA Report) was further refined to ensure the borough will meet 100% of its OAN. The November 2016 Regulation 18 SA Report, includes an assessment of four strategic options:

- . • Option 1: Urban Sites;
- . • Option 2: Brownfield Sites;
- . • Option 3: Green Belt (lower); and
- . • Option 4: Green Belt (moderate).

Total OAN	Option 1: Urban Sites	Option 2: Brownfield Sites	Option 3: Green Belt (lower)	Option 4: Green Belt (moderate)
Urban Sites	✓	✓	✓	✓
Maidenhead Town Centre	✓	✓	✓	✓
Ascot Regeneration	✓	✓	✓	✓
Adjacent to excluded settlements		✓	✓	✓
Outside excluded settlements		✓	✓	✓
Green Belt (Lower)			✓	✓
Green Belt (Moderate)				✓
Number of Units	2,687	3,462	5,999	8,399
Completions, commitments, small sites/windfalls	5,612	5,612	5,612	5,612
Sites identified in the HELAA	287	287	287	287
Total Number of Units (Including Completions, commitments, small sites/windfalls)	8,586	9,361	11,898	14,298
% of OAN	60.29	65.74	83.55	100.41

Full details of the options are presented above and have been reproduced from the Regulation 18 SA Report, where full details of the assessment findings are presented. The fourth option was identified as performing more favourably in more sustainability objectives than the other options; all options were associated with negative effects on some sustainability objectives. Option 4 now underpins the spatial strategy in the Borough Local Plan, as the preferred approach because of the balance it provides between supporting the required housing and employment growth whilst protecting the Green Belt and the environment.

A consultation on the draft Borough Local Plan was undertaken from Friday 2 December 2016 until Friday 13 January 2017. In 2016 RBWM undertook a Housing and Employment Land Availability Assessment that identified those housing and employment sites within the borough that are considered to be deliverable, developable or potentially developable. A cluster analysis was undertaken of these sites on a settlement-by-settlement basis in the SA Report; in addition 57 policies were also assessed.

Findings from this round of assessment were used to inform the preparation of the current version of the Local Plan, the Submission version.

## Summary assessment findings in the Submission Version of the Local Plan (2017)

The Submission version of the local plan assessed by this SA includes an assessment of 46 policies and over 100 sites. The assessment findings for each site have been presented individually rather than in clusters as was the approach presented in the Regulation 18 SA Report. The SA also reassesses the plan policies, which have been altered to reflect the findings of the Regulation 18 consultation.

The assessment of the Local Plan, including reasonable alternatives, was undertaken using a combination of empirical evidence, and to a lesser extent, professional judgement. The findings are presented in matrix format and are accompanied by a commentary on identified effects. The matrix is not a conclusive tool. Its main function is to show visually whether or not the Borough Local Plan proposals are likely to bring positive, adverse or uncertain effects in relation to the SA Objectives. The assessment commentary is used to interpret the matrix findings.

The overall findings of the 2017 Regulation 19 SA Report have been summarised in **Tables N1 and N2 below**. In the case of any potential negative effects, recommendations are made in terms of mitigation and monitoring, where possible. In-combination effects are discussed in **Chapter 19**.

**Table N1:** Potential positive effects of the BLP

### Potential positive environmental effects of the Borough Local Plan (BLP)

#### Climate change

Good access to railway stations and bus stops for residents, as well as convenient access for pedestrians and cyclists to most sites, will likely increase the use of sustainable transport methods.

Policies in the BLP are anticipated to support the development of renewable energy technologies.

#### Water and flooding

All sites within high flood risk zones will have to undergo appropriate flood risk

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sequential and exception tests before development may proceed.

#### Air and noise pollution

Policies in the BLP are anticipated to support the development of renewable energy technologies.

#### Biodiversity and geodiversity

Policies in the BLP are anticipated to help protect areas important to local, national and international bio and geodiversity.

The borough has an opportunity to use the BLP to enhance areas important to biodiversity and result in a net gain.

#### Landscape quality

A large number of sites are in urban areas and thereby avoid adverse impacts on natural landscapes.

Policies in the BLP are anticipated to help ensure that development located in sensitive landscapes, which have a lower capacity for change, will be of the appropriate quality in design so as to minimise discordance with the landscape setting.

#### Cultural heritage

Policies are in the BLP that are anticipated to help protect the settings and features of listed buildings and scheduled monuments.

Some sites and proposed development are anticipated to improve the setting and or the accessibility of some listed buildings.

#### Use of resources

A large number of sites allocated for development are on brownfield and previously developed land, which is considered to be an efficient use of the borough's resources.

#### Housing

The BLP proposes the construction of at least 14,240 residential units by 2033 to meet the borough's objectively assessed housing need.

#### Health

The BLP is considered to locate new residents within the target distance of hospitals, GP surgeries and green recreational spaces.

#### Community

Most sites are considered to be within a convenient walking distance of community facilities, amenities and wide ranging services, such as those found on high streets.

#### Transport

Most sites in the BLP are considered to be within the target and/or optimal distance of sustainable transport links like bus stops and railway stations, whilst also having convenient access for pedestrians and cyclists.

#### Education

A number of policies are anticipated to improve the education prospects of residents of the borough.

#### Economy

The BLP plans to provide at least 11,200 new jobs by 2033 and allocates employment land and seeks to renew, improve and regenerate existing employment areas.. This is anticipated to benefit the local economy significantly.

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**Table N2:** Potential adverse effects of the BLP

### Potential adverse effects of the Borough Local Plan (BLP)

#### Climate change

The construction of at least 14,240 residential homes will use a significant quantity of materials that are considered to have a large carbon footprint, such as cement, concrete and steel.

An increase in residents and workers in the borough is anticipated to lead to an increase in consumption and energy demands of the borough. With most energy anticipated to be non-renewably sourced, it is considered likely that greenhouse gas emissions in the borough will subsequently rise.

#### Water and flooding

A number of sites are located in or contain areas which are in Flood Zones 3a and 3b, where the risk of fluvial flooding is considered to be high. Sites in Flood Zone 3b are anticipated to have a 1:20 (or 5%) chance of fluvial flooding every year (in accordance with Environment Agency flood risk zones).

#### Air and noise pollution

A number of sites are located in Air Quality Management Areas where air quality is known to be a serious issue for local human and environmental health.

A large number of sites are located in heavily urban areas and/or adjacent to large and busy roads, where air and noise pollution is considered to be significant.

#### Biodiversity and geodiversity

The additional residents could potentially increase recreational pressures, such as by walking their dogs, on important wildlife sites.

Some sites are located on land that is considered to have some of the borough's most rich and stable soil that is most capable of supporting high yields of a range of agricultural crops.

#### Landscape quality

A number of sites are located in the Green Belt and in landscapes of the borough that are considered to have a low capacity for change. This could potentially result in the distinctiveness of some landscapes being detracted from.

#### Cultural heritage

There are a large number of listed buildings of designated and non designated heritage assets in the borough; in some instances allocated sites are adjoining listed buildings.

#### Use of resources

Some sites are located on land with an Agricultural Land Classification of Grade 1, 2 or 3. This is the borough's most rich and versatile land that is capable of producing high yields of agricultural crops.

#### Health

Residents may suffer the adverse consequences of poor air quality, particularly residents of sites located in Air Quality Management Areas and adjacent to major roads such as the M4.

#### Transport

Some sites are considered to have inconvenient access for pedestrians and cyclists.

## Mitigation

In cases where potentially adverse effects have been identified, including through through uncertainty, mitigation suggestions have been cited. Mitigation should be considered as part of a sequential hierarchy to deal with adverse effects: avoid, reduce, and then mitigate. Mitigation prescriptions might include changes to policy wording, advocating design guides, offsetting biodiversity effects or provision of new supporting green infrastructure. In the case of this SA Report, mitigation has been supplied to help address potential negative effects associated with classifications of uncertainty in the assessment process so that, if possible, no residual affects remain.

## Recommendations

Whilst the Local Plan brings a range of positive sustainability effects, a number of recommendations have been proposed to help further improve its sustainability performance when implemented.

## Monitoring

The SA Report explains why there should be a monitoring programme for measuring the BLP's implementation in relation to the areas where the SA has identified significant effects, and where opportunities for an improvement in sustainability performance may arise. Monitoring for the SA could be carried out in conjunction with other monitoring processes.

## Conclusions

Having appraised the Submission version of the BLP in full, the process has identified several positive and a smaller number of negative effects. Whilst mitigation has been proposed for some effects, where this is not possible or likely to mitigate the nature of effect such that it is nullified, the following residual significant adverse effects remain and are drawn to the attention of the plan makers. These include negative effects associated with flood risk, air quality and loss of soil resource.



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