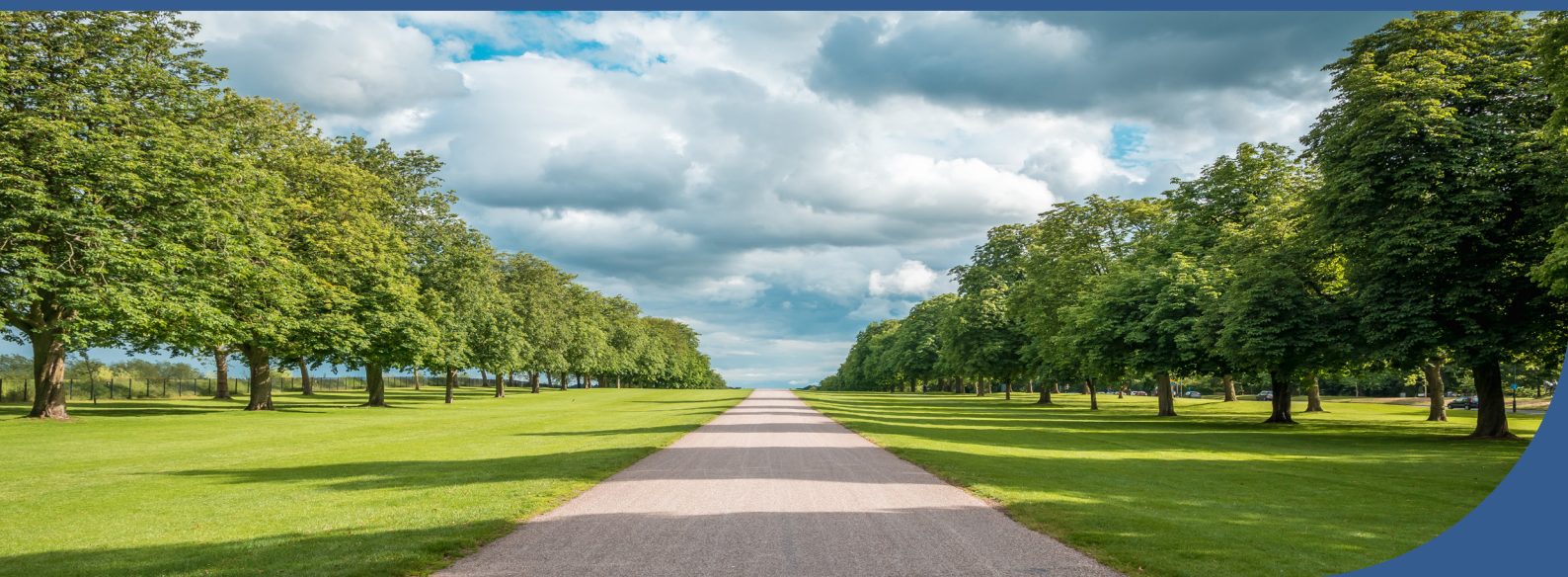


Sustainability Appraisal of the Royal Borough of Windsor and Maidenhead Local Plan 2013-2033

Post-Adoption Statement

February 2022



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



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1 Bath Street,

Cheltenham

Gloucestershire

GL50 1YE

Telephone: 01242 525222

E-mail: enquiries@lepusconsulting.com

www.lepusconsulting.com

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Acronyms and Abbreviations

AADT	Annual Average Daily Traffic
BLP	RBWM Borough Local Plan
BLPSV-PC	RBWM Borough Local Plan Submission Version – Proposed Changes Version
DBEIS	Department for Business, Energy & Industrial Strategy
DfT	Department for Transport
HELAA	Housing and Economical Land Availability Assessment
HRA	Habitats Regulations Assessment
LSE	Likely Significant Effect
MHCLG	Ministry for Housing, Communities & Local Government
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
RA	Reasonable Alternative
RBWM	Royal Borough of Windsor and Maidenhead
RTPI	Royal Town Planning Institute
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area

1 Introduction

1.1 Context and purpose of this report

1.1.1 This report comprises the Sustainability Appraisal Post-Adoption Statement for the Royal Borough of Windsor and Maidenhead (RBWM) Borough Local Plan 2013-2033. It has been prepared under Regulation 16 of the Strategic Environmental Assessment Regulations (SI 1633) 2004¹.

1.1.2 The RBWM Borough Local Plan (BLP) has been prepared by RBWM Council with the aim of positively planning for growth and development within the borough. The BLP is a development strategy covering 20 years for homes, jobs, leisure, transport and infrastructure, plus local parks and open spaces.

1.1.3 During the preparation of the BLP, the Council was required to carry out a Sustainability Appraisal (SA) of the Local Plan. SA is a statutory process incorporating the requirements of the Strategic Environmental Assessment (SEA) Directive².

1.1.4 The purpose of this Post-Adoption Statement is to outline how the SEA process has informed and influenced the Local Plan development process, and to demonstrate how consultation on the SEA has been taken into account.

1.2 The Royal Borough of Windsor and Maidenhead

1.2.1 As a place the Royal Borough is defined by its varied mix of towns and villages set in an attractive rural landscape of pasture, forests, royal parkland and water bodies. The unique and long association with the Crown has left the borough with many exceptional buildings and places and a rich portfolio of heritage assets, whilst the River Thames and the large number of trees and open spaces create a green character to the borough as a whole. Together these features create a unique identity for the borough based on its royal connections, heritage legacy and attractive, high quality and green places.

1.2.2 Figure 1.1 shows the location of the main towns in the Royal Borough.

1 The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date Accessed: 02/12/21]

2 SEA Directive. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Date Accessed: 02/12/21]

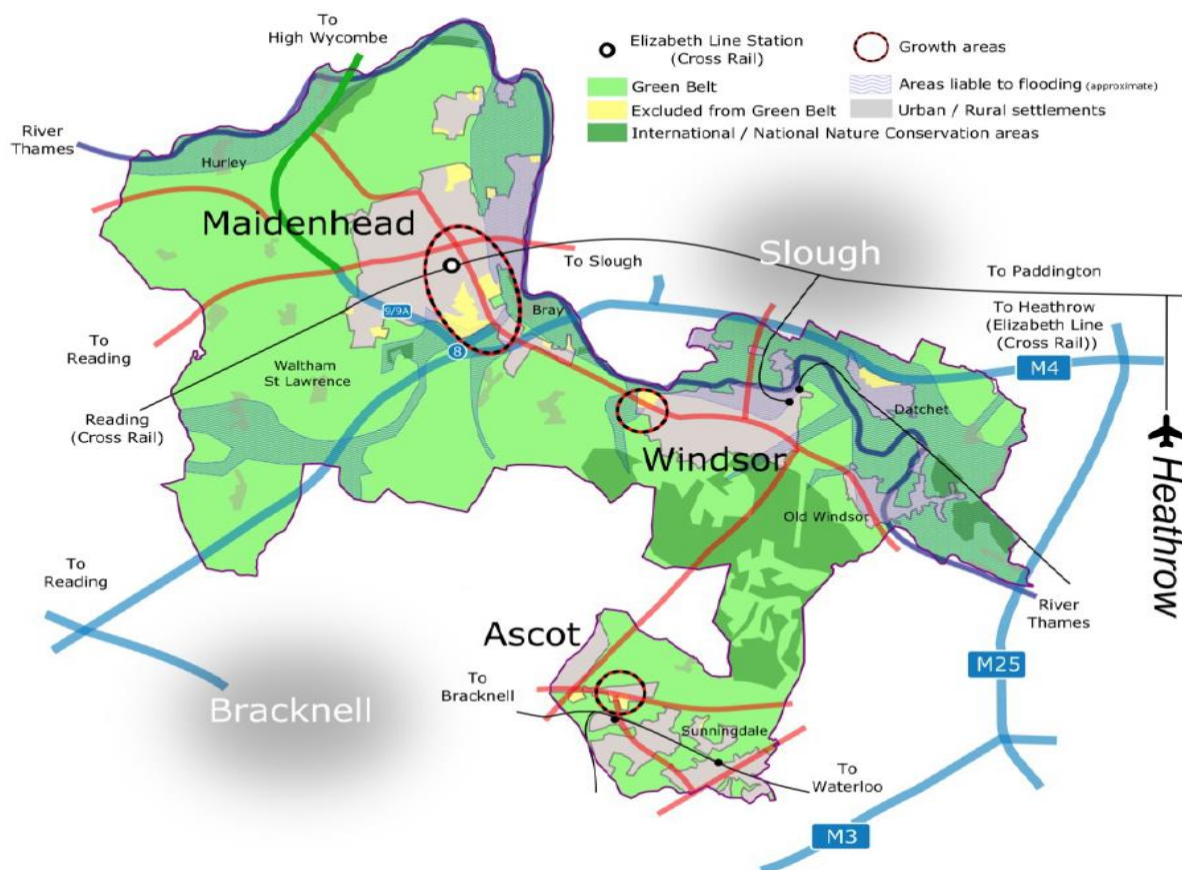


Figure 1.1: Key Diagram for the Royal Borough (Borough Local Plan Submission Version, 2017)

1.3 Requirement for the SEA Post-Adoption Statement

- 1.3.1 In order to meet the legislative requirements of the European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes (2004), a Post-Adoption Statement is required to be published “as soon as reasonably possible after the Plan has been adopted”³.
- 1.3.2 SEA Regulation 16⁴ sets out the post-adoption procedures, including the requirement to produce a statement containing a number of particulars (Regulation 16 Paragraph 4). Box 1.1 presents the requirements of this SEA Post-Adoption Statement.
- 1.3.3 Following best practice guidance, RBWM incorporated the SEA into the SA of the BLP. This Post-Adoption Statement provides sustainability information beyond the strict environmental parameters outlined in Box 1.1, to reflect the broader sustainability appraisal process.

3 RTPI (2018) RTPI Practical Advice: Strategic Environmental Assessment – Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sappracticeadvicefull2018c.pdf> [Date Accessed: 02/12/21]

4 The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/part/4/made> [Date Accessed: 02/12/21]

Box 1.1: SEA Regulation 16 Post-Adoption Procedures⁵

Information as to adoption of plan or programme

16.—

- 1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall—
 - a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and
 - b) take such steps as it considers appropriate to bring to the attention of the public—
 - i) the title of the plan or programme;
 - ii) the date on which it was adopted;
 - iii) the address (which may include a website) at which a copy of it and of its accompanying environmental report, and of a statement containing the particulars specified in paragraph (4), may be viewed or from which a copy may be obtained;
 - iv) the times at which inspection may be made; and
 - v) that inspection may be made free of charge.
- 2) As soon as reasonably practicable after the adoption of a plan or programme—
 - a) the responsible authority shall inform—
 - i) the consultation bodies;
 - ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and
 - iii) where the responsible authority is not the Secretary of State, the Secretary of State; and
 - b) the Secretary of State shall inform the Member State with which consultations in relation to the plan or programme have taken place under regulation 14(4), of the matters referred to in paragraph (3).
- 3) The matters are—
 - a) that the plan or programme has been adopted;
 - b) the date on which it was adopted; and
 - c) the address (which may include a website) at which a copy of—
 - i) the plan or programme, as adopted,
 - ii) its accompanying environmental report, and
 - iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained.
- 4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are —
 - a) how environmental considerations have been integrated into the plan or programme;
 - b) how the environmental report has been taken into account;
 - c) how opinions expressed in response to—
 - i. the invitation referred to in regulation 13(2)(d);
 - ii. action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
 - d) how the results of any consultations entered into under regulation 14(4) have been taken into account;
 - e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
 - f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

⁵ The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/part/4/made> [Date Accessed: 06/12/21]

1.4 About the Borough Local Plan

1.4.1 The BLP is the key document that provides the framework to guide the future development of RBWM. It sets out a spatial strategy and policies for managing development and infrastructure to meet the environmental, social and economic opportunities and challenges facing the area up to 2033. The Plan not only looks at the scale and distribution of development, but also explains how the Council and its partners will deliver it in a sustainable manner that maintains and enhances the quality of the places that make up the Royal Borough.

1.5 Using this document

1.5.1 This Post-Adoption Statement should be read alongside the BLP 2013 - 2033 and associated SA documents, which are summarised in Chapter 2 and can be found on the RBWM website.

1.5.2 This report has been prepared in order to meet the requirements of the SEA Regulations (see Box 1). The chapters are structured as per the criteria presented in the Regulations (see Table 1.1).

Table 1.1: Guide to the requirements of the SEA Regulations for this post adoption statement

Requirements of regulation 16 (4)	Location in this report
a) how environmental considerations have been integrated into the plan or programme;	Chapter 2 (SA Framework)
b) how the environmental report has been taken into account;	Chapter 4
c) how opinions expressed in response to— i) the invitation referred to in regulation 13(2)(d); ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;	n/a
d) how the results of any consultations entered into under regulation 14(4) have been taken into account;	Chapter 5
e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;	Chapter 3
f) The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	Chapter 6

2 Overview of the assessment process

2.1 Integrated approach to SA and SEA

2.1.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.

2.1.2 The SEA Directive applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *"the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development"*.

2.1.3 The SEA Directive has been transposed into English law by the SEA Regulations. Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the BLP to be subject to SEA throughout its preparation.

2.1.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004⁶ and should include an appraisal of the economic, social and environmental sustainability of development plans. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

2.2 Best Practice Guidance

2.2.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Directive. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance including the following:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment⁷.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive⁸.

⁶ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 06/12/21]

⁷ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date Accessed: 06/12/21]

⁸ Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date Accessed: 06/12/21]

- Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (NPPF)⁹.
- Department for Levelling Up, Housing & Communities and MHCLG (2021) Planning Practice Guidance (PPG)¹⁰.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans¹¹.

2.3 SA and the sequential plan making process

2.3.1 The SA (incorporating SEA) process has accompanied the plan making process and has informed the different stages of plan making on an iterative basis. The key stages and outputs are as follows

- SA Scoping Report (2016);
- SA of the Draft Local Plan (Regulation 18; November 2016);
- SA of the Submission Version of the Local Plan (Regulation 19; June 2017);
- SA Addendum to the Regulation 19 SA Report (January 2018);
- SA of the BLP Submission Version Proposed Changes (October 2019); and
- SA of the Proposed Main Modifications (July 2021).

2.3.2 All SA reports are available on the RBWM Council website¹².

2.3.3 Figure 2.1 sets out the stages of preparation of the RBWM Local Plan and the accompanying stage of SA where relevant.

⁹ MHCLG (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 06/12/21]

¹⁰ Department for Levelling Up, Housing & Communities and MHCLG (2021) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 06/12/21]

¹¹ RTPI (2018) RTPI Practical Advice: Strategic Environmental Assessment – Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date Accessed: 25/09/21]

¹² Borough Local Plan submission documents. Available at: <https://www.rbwm.gov.uk/home/planning-and-building-control/planning-policy/emerging-plans-and-policies/draft-borough-local-plan>

[Date Accessed: 20/02/22]

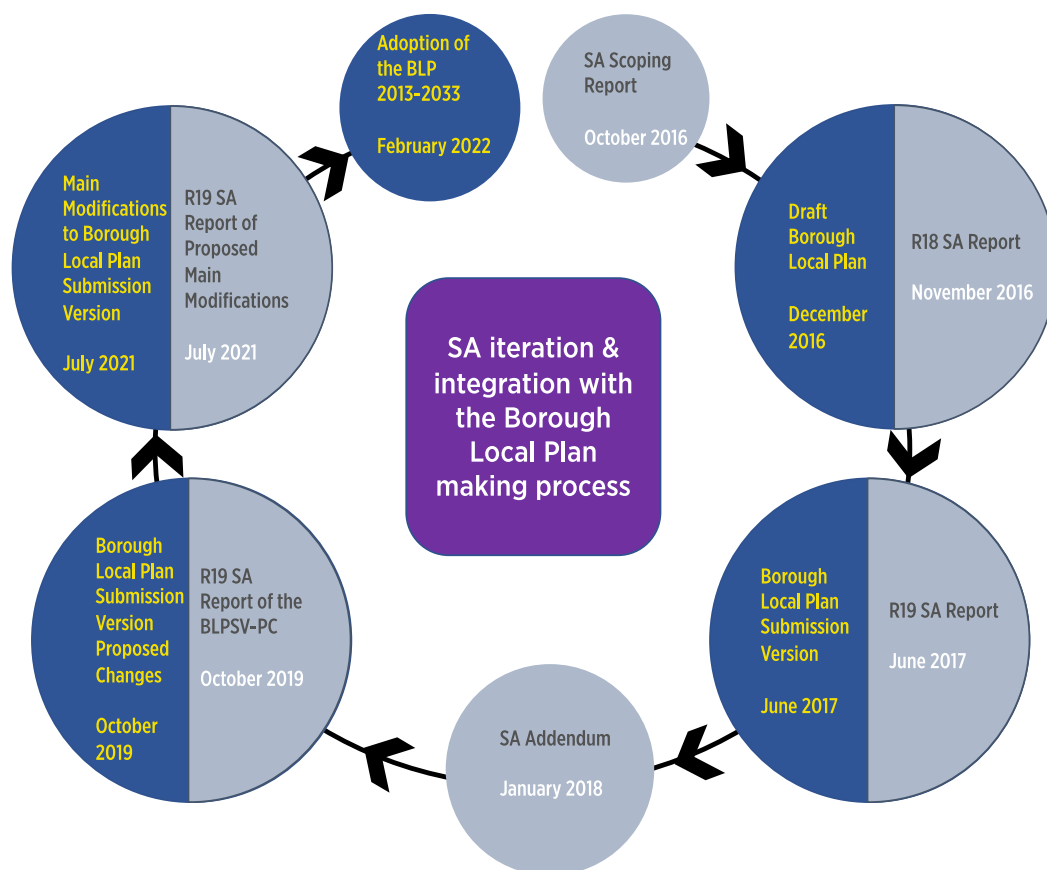


Figure 2.1: SA iteration and integration with the Borough Local Plan making process

Table 2.1: Timeline of sustainability appraisal reports in conjunction with RBWM Local Plan preparation

Date	Borough Local Plan consultation stages	SA Process
2016	N/A	SA Scoping Report
2016	Draft Local Plan	R18 SA Report: SA of the Draft Local Plan
2017	Submission Version	SA of the Submission Local Plan
2018	N/A	SA Addendum to the 2017 SA Report
2019	Borough Local Plan Submission Version – Proposed Changes	SA Addendum to the Regulation 19 SA Report
2021	Proposed Main Modifications to the Submission Version of the BLP	SA of the Proposed Main Modifications

2.4 SA Framework

2.4.1 The SA process used an SA Framework to appraise the plan as it evolved. The purpose of the SA Framework is to provide a way of ensuring that the Local Plan preparation process considers the environmental, social and economic impacts of the proposed site allocations and policies on the various environmental, social and economic receptors located in and around the borough. The Framework offers a consistent and robust means of description, analysis and comparison for these impacts.

2.4.2 The SA Framework consists of 14 sustainability objectives. The extent to which these objectives will be achieved can, in most cases, be measured using a range of indicators. The SA Objectives were largely informed by topics of Annex I (f) of the SEA directive¹³, taking into account other relevant national, regional and local plans and programmes and local key issues. By taking into account each of these influences, the SA Framework allows for a robust, thorough and meaningful Sustainability Appraisal.

2.4.3 The SA Objectives included within the SA Framework are set out in Table 2.2.

Table 2.2: SA Framework objectives

SA Objectives		Relevance to SEA Directive - Annex 1(f)
1	Climate change: Minimise the borough's contribution to climate change and plan for the anticipated levels of climate change.	Climate change.
2	Water and flooding: Protect, enhance and manage RBWM's waterways and to sustainably manage water resources.	Water
3	Air and noise pollution: Manage and reduce the risk of pollution, including air and noise pollution.	Air and noise.
4	Biodiversity and geodiversity: Protect, enhance and manage the natural heritage of the borough.	Biodiversity and geodiversity.
5	Landscape quality: Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening its distinctiveness.	Landscape, historic environment.
6	Cultural heritage: Conserve, enhance and manage sites, features and areas of historic and cultural importance.	Cultural heritage
7	Use of resources: Ensure protection, conservation and efficient use of natural and man-made resources in the borough.	Climate change and soil.
8	Housing: Provide a range of housing to meet the needs of the community.	Housing, population and quality of life.
9	Health: Safeguard and improve physical and mental health of residents.	Population, quality of life and human health.
10	Community safety and wellbeing: Reduce poverty and social deprivation and increase community safety.	Population, quality of life and human health.
11	Transport and accessibility: Improve choice and efficiency of sustainable transport in the borough and reduce the need to travel.	Accessibility, climate change and material assets.

¹³ Biodiversity flora and fauna; Population; Human health; Soil; Water; Air; Climatic factors; Material assets; Cultural heritage (including architectural and archaeological heritage); and Landscape.

SA Objectives		Relevance to SEA Directive - Annex 1(f)
12	Education: Improve education, skills and qualifications in the borough.	Population and economic factors.
13	Waste: Ensure the sustainable management of waste.	Material assets, air, soil, water.
14	Economy and employment: To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	Economic factors.

2.4.4 The likely adverse and positive sustainability effects of the BLP as identified in the various SA reports are presented in Chapter 3.

2.4.5 Assumptions for each of the SA Objectives were developed and supported by the SA methodology which is presented in the R19 SA Report (Submission Version, 2017).

2.5 Habitats Regulations Assessment

2.5.1 The BLP was subject to a Habitats Regulations Assessment (HRA) in accordance with the Conservation of Habitats and Species Regulations 2017 as amended¹⁴ (the Habitats Regulations).

2.5.2 Following a screening exercise (Stage 1 of the HRA process) an Appropriate Assessment¹⁵ (Stage 2 of the HRA process) was undertaken to assess Likely Significant Effects (LSEs) in more detail. LSEs associated with recreation could not objectively be ruled out at the following European Sites:

- Chilterns Beechwoods SAC
- Thames Basin Heaths SPA
- Thursley, Ash and Pirbright & Chobham SAC
- Windsor Forest and Great Park SAC
- Burnham Beeches SAC

2.5.3 The HRA concluded that, based on the Council's continued adoption and progress of the relevant monitoring and mitigation strategies, all potential LSEs on European sites caused by the BLP alone or in-combination could be objectively ruled out.

2.5.4 In 2021, the Main Modifications were assessed in the HRA process¹⁶. This assessment concluded that there would be no adverse impact on the site integrity of any European site as a result of the Main Modifications.

¹⁴ The Conservation of Habitats and Species Regulations (2017) SI No. 2017/1012, TSO (The Stationery Office), London.

¹⁵ Lepus Consulting (2020) Habitats Regulations Assessment of the RBWM Local Plan (March, 2020)

¹⁶ Lepus Consulting (2021) HRA of the RBWM Borough Local Plan (2013 - 2033) Submission Version - Main Modifications (July, 2021)

3 Why the adopted Local Plan was chosen, in light of reasonable alternatives

3.1 Reasonable alternatives

3.1.1 At each stage of the plan making process, different reasonable alternatives were identified, described and evaluated through the SA process.

3.1.2 The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. Reasonable alternatives (RAs) are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

3.1.3 The following types of RA were assessed in the SA process for the BLP:

- Housing number and distributional options called 'Strategic Scenarios' (R18 SA Report, 2016 and SA Addendum, 2018);
- Strategic Locations (R18 SA Report, 2016); and
- Development allocations (various SA reports: R18, R19, SA Addendum, and R19 BLPSV-PC – see Figure 2.1 for reference).

3.1.4 RAs were identified by RBWM using a range of evidence and variables such as the Housing and Economic Land Availability Assessment (HELAA) and Green Belt information. The RAs have been evaluated throughout the plan making process.

3.2 SA of the Housing Number

3.2.1 Housing number options were tested in 2016. Table 3.1 has been reproduced from the 2016 SA report.

Table 3.1: Spatial Options and Quanta reasonable alternatives assessed during 2016

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

3.2.2 The SA findings concluded that the options performed differently according to the SA objective being assessed. It was possible to identify best performing options according to SA objective however a clear singular best performing option did not emerge.

3.2.3 Subsequently, the Council revisited the SA of spatial options in 2018 through the SA Addendum. In 2018, and in response to a revised Objectively Assessed Need (OAN) number, the Council undertook a much-expanded process that explored a total of three further main options and various sub-options all of which included a housing number above the highest number that was tested in 2016 (14,298 units). The options have been reproduced from the 2018 SA report in Table 3.2.

Table 3.2: Spatial Options and Quanta reasonable alternatives assessed during 2017

Housing number options			
	Option 5: Revised OAN. 15,560 homes	Option 6: Original OAN + Slough unmet need c. 20,000 homes	Option 7: Original OAN + Slough and C&SB unmet need c. 25,000 homes
Spatial distribution options			
	↓	↓	↓
A	Strong intensification of urban areas of Maidenhead, Windsor and Ascot	New garden village/ settlement of around 6,000 units	New garden village/ settlement of around 11,000 units
B	New garden village/ settlement of around 1,320 units	Intensification across all sites + New garden village/ settlement of 1,500-2,000 units	Intensification across all sites + Release of additional Green Belt sites on edge of existing excluded settlements. + New garden village/settlement of 2,000-4,000 units
C	Intensification of sites proposed for release from Green Belt on the edge of existing excluded settlements	Intensification across all sites, including around railway stations + New garden village/settlement of 4,000-5,000 units	Intensification across all sites + New garden village/settlement of around 8,000 units
D	Release of additional Green Belt sites on edge of existing excluded settlements, predominantly around Maidenhead	Release of a larger number of employment sites + New garden village/ settlement of 4,000-5,000 units	-
E	-	Intensification across all sites + Release of additional Green Belt sites on edge of existing excluded settlements.	-

3.2.4 All options for the quanta and distribution of development were anticipated to have a variety of positive and adverse impacts. Where greater quantities of development were proposed, more adverse impacts were generally anticipated. Intensification of development can help avoid adverse impacts on sensitive receptors in some locations, but make avoiding them in other locations more difficult. Allowing for the constraints of assessment and level of detail presented in the options, the results indicated that Housing Option 4 was the best performing housing option when compared to the others, and spatial distribution 4 was the best performing spatial option.

3.3 SA of Strategic Locations

3.3.1 The R18 Report (2016) included an appraisal of five strategic locations that were considered for growth:

- Ascot Town Centre;
- Maidenhead Golf Course and associated sites;
- Maidenhead Town Centre;

- Land South of the A308(M), west of Ascot Road and North of the M4 (known as the Triangle Site); and
- Land West of Windsor.

3.3.2 All locations performed generally well in several respects, with the Triangle Site performing with negative effects for flood risk, air pollution, landscape quality and transportation.

3.4 SA of the Development Sites

3.4.1 The R18 SA Report (2016) assessed some 119 RA sites from which an initial 48 were shortlisted for allocation as housing sites and 19 for employment use. Generally, SA objectives for socio-economic factors performed well whilst environmental SA objectives performed on a mixed basis of positive and negative effects.

3.4.2 The R19 Submission SA report included assessment of some 78 sites to be proposed as allocations. A range of different effects were recorded from the appraisal. All sites were evaluated pre- and post-mitigation by applying the mitigating effects of proposed local plan policies, in order to identify residual effects. The outcome of this process is discussed further in Chapter 4.

3.4.3 Following an early hearing stage in August 2018, and a subsequent call for sites, the Council was directed by the Inspector to consider revising aspects of the Submission Version of the Local Plan. The Council consequently prepared a suite of Proposed Changes. All proposals were assessed in an SA Report and were published for consultation in October 2019. This new SA report included more RAs as well as preferred options, all of which were evaluated in the SA process.

3.5 Selection and rejection of reasonable alternatives

3.5.1 Table 5.1 of the Proposed Changes SA Report (2019) presents the reasons for selection and rejection of the preferred 40 allocated sites in the BLP. The SA findings have been utilised alongside other evidence streams to justify selection or rejection. All site proposals were subsequently examined through the examination process.

3.6 SA of Main Modifications (July 2021)

3.6.1 Following the Local Plan hearing sessions, the Inspector identified a number of Main Modifications to rectify issues of legal compliance and/or soundness with the Local Plan. Of the changes, the following policies were considered to warrant further assessment through the SA process: Policies SP2, QP3a, HO1, HO2, HO3, ED4 and NR4. A number of proformas for site allocations were also revisited by the SA process. These included AL26A, AL32A and AL40A all of which were reintroduced to the Plan by the Inspector. Boundary changes at site allocations AL20 and AL26 also warranted additional appraisal

3.6.2 Overall, the Main Modifications of the BLP would be expected to improve the sustainability performance of the Local Plan. The new and amended policies assessed within the SA of Main Modifications report would be likely to result in positive impacts, or no significant change, with regard to sustainability. The modifications would not be expected to alter the residual effects identified in the Regulation 19 SA report and associated proposed changes.

4 How the Environmental Report has been taken into account

4.1 SA Recommendations

4.1.1 The SA of the BLP, in particular the R19 Submission SA Report and proposed changes, identified residual positive and negative effects associated with several SEA topics. This chapter discusses the significance of the residual effects and reviews the extent to which the BLP has responded to the findings, if at all.

4.1.2 Table 4.1 documents all adverse residual effects and discusses the policy response to each effect. There is not always a policy response.

4.1.3 Table 4.2 documents all positive residual effects.

Table 4.1: Adverse effects of the Local Plan recorded in the 2019 BLPSV-PC SA report

SEA Topic	Residual impacts	Short, medium or long term, temporary or permanent?	Changes through Main Modifications
Air pollution	<ul style="list-style-type: none"> Reduction in air quality with implications for human health and/or ecosystems. Increased pollutant emissions, including greenhouse gases Reduction in local air quality with implication for human health. 	A reduction in air quality and increased pollutant emissions in the borough would be expected to be a long-term but reversible impact.	MM41 recognises that it will be important to ensure that new development is carefully phased so that it does not delay compliance with air quality standards in zones which are currently out of compliance, or cause non-compliance to occur during the period leading up to 2033.
Biodiversity, flora and fauna	<ul style="list-style-type: none"> Threats or pressures to internationally/ European/ nationally and locally designated biodiversity sites. 	Threats and pressures on designated biodiversity sites could potentially be a long-term but reversible impact.	MM37 clarifies and strengthens wording around the protection of European sites.
Climate and water	<ul style="list-style-type: none"> Increased greenhouse gas and carbon emissions. 	An increase in greenhouse gas emissions in RBWM would be likely to be a long-term but potentially reversible impact.	MM6: The Strategic Priorities for the Plan include reducing the impact of and adapting to climate change, including suitable flood prevention measures, including the promotion and protection of Green Infrastructure, green energy projects, and encouraging travel by modes other than the car. Policy SP2 has been expanded to help address the Climate Change emergency.

SEA Topic	Residual impacts	Short, medium or long term, temporary or permanent?	Changes through Main Modifications
Landscape	<ul style="list-style-type: none"> Alteration of the landscape character. Loss of tranquillity. 	Permanent adverse effects.	
Soil	<ul style="list-style-type: none"> Loss of soil resources, including BMV land. Ecosystem services. 	<p>The loss of 176.5ha of soil, including BMV land, would be expected to be a permanent and irreversible impact.</p> <p>The loss of ecosystem services would be likely to be a long-term but reversible impact.</p>	MM15 strengthens the policy on BMV land stating that 'Within rural areas, proposals should not result in the irreversible loss of best and most versatile agricultural land (grades 1, 2 and 3a)'.
Water	<ul style="list-style-type: none"> Increased water demand 	Increased pressures on water sources would be likely to be long-term and potentially irreversible.	MM51 strengthens the submission policy wording as follows: 'Development proposals must demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off site to serve the development and that the development would not lead to problems for existing users'.
Waste	<ul style="list-style-type: none"> Increased household waste generation. 	Permanent adverse effects.	There is no specific policy response to this issue.

Table 4.2: Likely positive sustainability effects of the BLP (reproduced from Table 17.3, 2019 BLPSV-PC SA Report)

Residual positive effects	
1	<p>Housing provision</p> <p>The proposed development of 14,240 dwellings across the Plan area would be expected to make a significant and positive contribution towards meeting the identified local housing need. Policies within the BLPSV-PC would be expected to ensure that residential developments meet the needs of the local community, including affordable housing and gypsy and traveller accommodation.</p>
2	<p>Employment opportunities</p> <p>The proposed development of 11,200 new employment opportunities through development allocations within the BLPSV-PC, would be expected to make a significant and positive contribution to the employment needs of residents and to the local economy. Policies within the BLPSV-PC help to ensure that a range of types and sizes of employment land are available.</p>
3	<p>Green Network</p> <p>The BLPSV-PC aims to ensure that development proposals incorporate green and blue infrastructure where possible. Although the proposed development would be expected to result in the loss of greenfield land and associated biodiversity to some extent, policies and site proforma information help to ensure that green and blue infrastructure provisions are retained and enhanced across the Plan area.</p>
4	<p>Transport and Accessibility</p> <p>Policies and site proforma information within the BLPSV-PC would be anticipated to improve residents' access to sustainable transport options, including frequent bus services and improved pedestrian and cycle networks. This would be likely to help improve access to local services and facilities and help reduce personal reliance on car use.</p>
5	<p>Physical and Mental Health</p> <p>Although some new residents within the borough could potentially be located outside a sustainable distance to healthcare facilities, policies within the BLPSV-PC would be likely to help improve access to these services via sustainable transport routes. In addition, the increased provision of open space and green infrastructure within the borough would be expected to help facilitate healthy and active lifestyles, increasing access to space for physical exercise as well as areas with mental wellbeing benefits.</p>
6	<p>Community Cohesion</p> <p>The site allocations and policies within the BLPSV-PC would be likely to increase the provision of community facilities within the Plan area. This would be expected to help facilitate vibrant and interactive communities, and lead to a greater sense of place within settlements.</p>

5 How opinions of consultation bodies and the public have been taken into account

5.1 Consultation responses

5.1.1 At each stage of the preparation of the BLP, an SA Report was published for consultation both with the public and statutory bodies (Natural England, Historic England and the Environment Agency). The consultation stages relating to the SA documents as well as the consultation responses received from statutory bodies relating to the SA are summarised in Table 5.1.

5.1.2 All consultation responses to the Local Plan and the accompanying evidence base, including comments from the statutory consultees on the Local Plan itself, can be found on the RBWM website.

Table 5.1: SA stages and their relating consultation responses from statutory consultees

Response from	Published SA/SEA Report	Summary of Consultation Responses	Incorporation into the SA
Scoping Report (October 2016)			
Natural England	SA Scoping Report (March 2012)	No specific comments were received from Natural England, the Environment Agency or Historic England in relation to the SA during the Scoping Report Consultation.	N/A
Historic England			
Environment Agency			
Regulation 18 (December 2016 – January 2017)			
Natural England	SA of the Borough Local Plan (2013-2032) Regulation 18 Report (November 2016)	No specific comments were received from Natural England, the Environment Agency or Historic England in relation to the SA during the Regulation 18 Consultation.	N/A
Historic England			
Environment Agency			
Regulation 19 (June – September 2017)			
Natural England	SA of the Borough Local Plan (2013-2033) Regulation 19 Report (June 2017)	No specific comments were received from Natural England, the Environment Agency or Historic England in relation to the SA during the Regulation 19 Consultation.	N/A
Historic England			
Environment Agency			
SA Addendum (January 2018)			
Natural England	SA of the Borough Local Plan (2013 –	Section 10 of the Sustainability Appraisal covering Datchet, doesn't mention the	The SA incorporated the comment into the next phase where the SPA is noted,

Response from	Published SA/SEA Report	Summary of Consultation Responses	Incorporation into the SA
	2033) Addendum (January 2018)	close proximity of the conurbation to the South West London Waterbodies (SPA). This is not consistent with how the other Natura 2000 sites are treated within other sections of the Sustainability Appraisal.	amongst others in and around the borough, as being vulnerable to development related threats and pressures. It was recommended that an Appropriate Assessment, along with hydrology and recreation studies, explore this matter and make mitigation recommendations.
Historic England		No specific comments were received from Historic England in relation to the SA.	N/A
Environment Agency		No specific comments were received from the Environment Agency in relation to the SA.	N/A
Regulation 19 Submission Version – Proposed Changes (August – October 2019)			
Natural England	SA of the RBWM Borough Local Plan Submission Version – Proposed Changes (October 2019)	No specific comments were received from Natural England, the Environment Agency or Historic England in relation to the SA during the Regulation 19 Submission Version Consultation.	N/A
Historic England			
Environment Agency			
Main Modifications (July – September 2021)			
Natural England	RBWM Borough Local Plan (2013 – 2033) Submission Version Proposed Main Modifications SA Addendum (July 2021)	No specific comments were received from Natural England, the Environment Agency or Historic England in relation to the SA during the Main Modifications Consultation.	N/A
Historic England			
Environment Agency			

6 How the environmental and sustainability effects of the Local Plan will be monitored

6.1 Monitoring

6.1.1 The SEA Regulations require that significant effects resulting from the implementation of the plan should be monitored. SEA Regulation 17 states that:

6.1.2 *"The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action".*

6.1.3 The monitoring requirements typically associated with the SA process are recognised as placing heavy demands on authorities with SA responsibilities. For this reason, the proposed monitoring framework focuses on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.

6.1.4 Monitoring the impacts of the Local Plan should seek to answer:

- Was the likelihood of sustainability impacts identified in the SA process accurate?
- Is the Local Plan successful in achieving its desired sustainability objectives?
- Are mitigation measures performing as expected?
- Are there any unforeseen adverse impacts of the Local Plan, and are these within acceptable limits or is remedial action required?

6.1.5 Monitoring proposals for the BLP, as presented in the Regulation 2019 BLPSV-PC SA Report, are set out in Table 6.1.

Table 6.1: Monitoring proposals for the BLP as presented in the 2019 BLPSV-PC SA Report

Residual adverse effects	Receptor	Scale and frequency	Indicator
Reduction in air quality	Traffic flows on A roads and motorways	Annually, along key routes	Traffic flow increases annually e.g. DfT AADT counts
	Rates of public transport uptake	Annually, Plan area wide	Rates of uptake declining or showing no signs of improvement
Increased emissions of greenhouse gases	Proportion of energy from renewable sources and carbon footprint of the borough	Annually, Plan area wide	Annual increases in the use of coal and oil sourced energy e.g. DBEIS statistics on local authority energy consumption
Alter the local landscape character	Loss of key landscape features due to development	Annually, Plan area wide	Annual increases in quantity of development approved in sensitive LCAs
Loss of tranquillity	Change to the "quality of calm"	Annually, within the designated landscapes	Annually, there is increased disturbance resulting in a loss to tranquil areas
Increased household waste generation	Proportion of household waste recycled	Annually, Plan area wide	Recycling rates in the borough increasing annually.
Loss of best and most versatile land	Use of BMV land for alternative use, such as developments	Annually, Plan area wide	Annual increases of development on BMV land
Loss of soil resource	Increased development on previously undeveloped land	Annually, Plan area wide	Quantity of soil lost to development increases annually
Increased stress of water resources	Increased demand on the water resource	Annually, Plan area wide	Increased use of a scarce water resource can lead to an inability to meet demand locally
Increased pressure on ecosystem services	Quality and quantity of habitats and environment resources	Annually, particularly within important biodiversity sites	Annually there is an increased demand for ecosystem services as population growth results in a growing need for housing, food and energy.

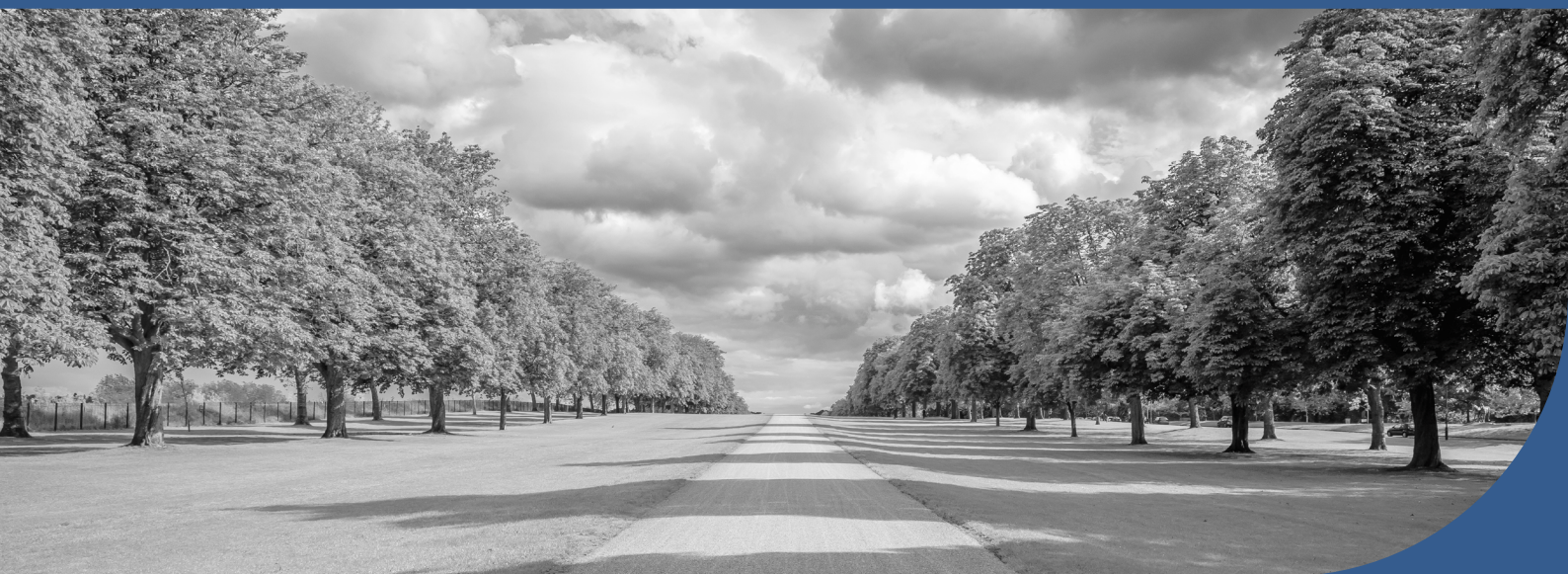
6.1.6 As part of the Main Modifications process the Council has provided a monitoring framework which includes some of the topics in the above proposals as well as other matters relevant to the BLP.

Habitat Regulations Assessments
Sustainability Appraisals
Strategic Environmental Assessments
Landscape Character Assessments
Landscape and Visual Impact Assessments
Green Belt Reviews
Expert Witness
Ecological Impact Assessments
Habitat and Ecology Surveys



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

© Lepus Consulting Ltd
1 Bath Street Cheltenham GL50 1YE
T: 01242 525222
E: enquiries@lepusconsulting.com
www.lepusconsulting.com
CHELTENHAM



Lepus Consulting
1 Bath Street
Cheltenham
Gloucestershire GL50 1YE

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com